



LEXINGTON HOUSING AUTHORITY

MOVING TO WORK

FY2021 Annual Plan

Submitted December 28, 2020



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I. Introduction

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

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

Overview of Short-Term and Long-Term Objectives

Addressing COVID-19 (Coronavirus)

LHA's short-term goals focus largely on developing solutions that address continuing operations as well as implementing safe practices to keep our clients and employees safe through the Covid-19 pandemic. In the wake of the pandemic, the LHA is making every effort to continue to administer programs and offer services to clients in alternative ways that continue to evolve day by day. Like the rest of the world, our operation was disrupted in mid-March of 2020 due to closures because of the coronavirus. As a result of state and federal shutdown orders the Housing Authority closed its offices on March 24, 2020.

During the shutdown, LHA's maintenance employees only responded to emergency calls, prioritizing those emergency requests left with an answering service. Maintenance staff continued to service two senior high-rise apartment buildings to disinfect and sanitize daily. Certifications, interims and requests for moves/transfers and all other business was suspended and communication with clients was conducted through phone calls, emails and U.S. mail. The Housing Authority's senior management team continued to meet regularly via electronic video conferencing, conference calls and emails to make decisions regarding procedures.

On May 4, 2020 LHA employees returned to their offices with offices closed with no face-to-face meetings and business conducted remotely (phone, email, video conferencing and mail). LHA made the decision to suspend hiring, travel and meetings/gatherings of more than ten (10) where acceptable social distancing cannot be practiced as a precaution to the coronavirus. As of the date of this writing, LHA offices remain closed to the public but operations continue in a limited capacity. The LHA has developed a catastrophic emergency plan that will be in place for future events.

Operations Continue With Social Distancing

LHA employees and clients are practicing and learning a 'new normal' in our operations that encourages social distancing and deliberate hygiene practices. Administrative staff are conducting interviews for new admissions, certifications and interims via phone and video conferencing. Email, U.S. mail, social media and our website are used in place of face-to-face contact to notify clients of important information. Move-ins and inspections are conducted with social distancing at the forefront. Electronic signatures are utilized when needed for necessary documents. The regular monthly meeting of the LHA Board of Commissioners has been held via video conferencing since May 2020.

HUD Waivers and the CARES Act

Under the Coronavirus Aid, Relief and Economic Security (CARES) Act, HUD waived and established alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher (HCV) programs (PIH Notice 2020-05). LHA elected to adopt some of the waivers to address delays and suspend program requirements. The LHA requested and was approved technical

amendment to the current (FY2020) Plan year activities to suspend or modify certain MTW activities.

On March 27, 2020, President Trump signed the CARES Act into law, which authorized over \$2 trillion in emergency assistance and health care response for individuals, families and businesses affected by the COVID-19 pandemic. LHA will receive approximately \$900,000 in CARES Act funds for both the Public Housing and HCV programs. Funds that will be used to address issues related to COVID-19.

Voucher Funding For At-Risk Populations

The LHA is committed to helping to reduce homelessness in Lexington-Fayette County. To that end, LHA has applied for two grants that would assist Veterans and Foster Youth. LHA is seeking funding totaling more than \$122,000 through grants for Family Unification Program (FUP) - Foster Youth to Independence (FYI) Special Fees and HUD Veterans Affairs Supportive Housing (VASH) special fees.

An award of HUD-VASH Special Fees funding would allow LHA to both strengthen existing partnerships and seek additional opportunities to work with local agencies to respond to the unmet needs of veterans in the community. These fees will also ensure that LHA can rapidly address new episodes of veteran's homelessness in Lexington-Fayette County.

LHA currently provides 292 Housing Choice Vouchers (HCV) as part of the U.S. Department of Housing and Urban Development (HUD) Veterans Affairs Supportive Housing (VASH) program, which combines HCV rental assistance for homeless veterans with case management and clinical services provided by the Lexington Veterans Administration Medical Center (VAMC). In addition to the HUD-VASH vouchers, LHA has a local Veteran's program through its Housing Choice Voucher Program (HCV), which serves an additional 75 veterans.

In general terms, when a foster youth reaches 18 years of age, they exit the foster care system and often lack the independent living skills to be successful on their own. Therefore, foster youth can end up homeless. FYI provides housing assistance and supportive services to eligible youths who have attained at least 18 years of age and not more than 24 years of age, and who have left foster care, or will leave foster care within 90 days, and who are at risk of or experiencing homelessness.

LHA, in collaboration with local resources, will assist FUP eligible youth to ensure the youth has access to safe, affordable housing, and are supported to reach self-sufficiency by working toward education and employment goals. HUD has awarded LHA 23 FUP-FYI vouchers. An award of FUP Special Fees funding, would allow LHA to both strengthen existing partnerships and seek additional opportunities to work with local agencies to respond to the unmet needs of FUP-FYI youth in the community. These fees will also ensure that LHA can provide supportive services and ensure that FYI youth can move into their new homes with a voucher in the shortest time possible.

Long Term Objectives

Encouraging Self-Sufficiency

LHA continues to seek resources to offer programming to assist families in becoming self-sufficient. Through HUD's Family Self-Sufficiency (FSS) programs for public housing and HCV, 100 families can establish goals for success with the help of case management. FSS participants work to improve their financial literacy, continue their education, improve their employment outlook for the future of their families. Upon completion of the program the goal is to have saved money for use to assist with major life goals such as purchasing a home, buying a car or reducing debt.

LHA's local MTW FSS initiative (Activity 22: Rent Reform: Housing Choice Voucher Time Limit Pilot Program) serves up to 25 voucher participants who want to work toward self-sufficiency. The local FSS program requires that participants work a certain number of hours per week, establish and work toward goals that will empower them and participate in case management.

The majority of LHA's public housing/tax credit units are designated as self-sufficiency units. Eligible participants agree to an employment requirement of 20 to 37.5 hours per week, depending on the site. If the employment requirement is not met the participant is held to rent based on imputed income. LHA sees employment and education as important keys to attaining self-sufficiency.

Programs for Youth

Developing programs and securing resources to offer programs for youth is an important objective in improving the lives of LHA families. In April 2020, LHA staff was notified that a grant award of \$30,000 from Ohio Capital Corporation for Housing (OCCH) was approved for children ages 11-13 living at four LHA sites. Overcoming Obstacles: A Summer Experience program goals include managing behavior, building positive peer relationships, problem solving and decision making. Activities will be focused on enhancing social, emotional and academic success. LHA will implement and evaluate the summer program in collaboration with the University of Kentucky College of Health Sciences (UKCHS).

Needs Beyond Housing

Like other PHAs, LHA struggles with how to provide services beyond housing that are needed but difficult to address for program participants due to strained funding. LHA is acutely aware of the need for additional services for our clients that range from healthcare, food instability, transportation, childcare, job training, continuing education, etc. Even with the many partnerships in place more help is needed. LHA is committed to staying aware to what is happening in our community through non-profit board participation and community outreach. A number of our LHA staff volunteer time to serve on community boards that include Community Action Council, HOPE Center, Salvation Army, Social Services Advisory Board, etc.

Craft Local Initiatives to Address Long-Term Needs

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

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

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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Ongoing Implemented agency-wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Closed Out FY2018	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 (Significantly Modified)	Ongoing Implemented FY2015	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013	Not Implemented until necessary	3

8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013 -FY2014 Significantly Modified	Modified in FY2014 - Pimlico Converted to PBV w/ RAD/Not Implemented	3
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Implemented Resources used for RAD revitalization of Pimlico	3
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014 Significantly Modified Modified FY2020	Ongoing	3
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Implemented until/ necessary for emergency capital repairs	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014 Modified FY2020	Ongoing	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Closed Out FY2016	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Ongoing	1
18	Streamlined HQS Inspection of LHA-Owned/Controlled Property	FY2017	Ongoing	1
19	Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	FY2017	Ongoing	3
20	Assign Project-Based Vouchers To LHA Owned and Controlled Units Without Bid Process	FY2017	Ongoing	3
21	Triennial Certifications For HCV Homeownership Participants (Rent Reform)	FY2017	Ongoing	1
22	HCV Time Limit Pilot Program (Rent Reform)	FY2018	Ongoing	1, 2 & 3
23	Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/ Controlled Properties	FY2018 Amended Plan	Ongoing	1
24	Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/ Controlled Units	FY2019	Not Yet Implemented	1
25	HCV – Allow Excluded Income to Make Units Affordable	FY2020	Ongoing	3
26	Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform)	FY2020 Amended Plan	Ongoing	3

II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year

0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A	0	N/A
N/A	0	N/A
N/A	0	N/A

0

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
N/A	0	N/A	N/A
N/A	0	N/A	N/A

Planned Total Vouchers to be Newly Project-Based

0

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Centre Meadows	206	Complete	Yes	Family site renovated in 2014
Connie Griffith Apts.	43	Complete	No	High rise apartments for 62 and over – voluntary conversion to PBV in FY2020
	249			

Planned Total Existing Project-Based Vouchers

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
In April 2018 the LHA submitted application for Voluntary Conversion of Connie Griffith Apartments (Griffith), a 183-unit public housing high rise for seniors owned and operated by the LHA. LHA received approval of the application for voluntary conversion of Connie Griffith on June 3, 2019. Griffith is connected by a 1-story structure to Ballard, 134-unit high-rise for seniors. The site underwent conversion to project-based vouchers January 6, 2020.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
KY004 PHA-Wide Management Improvements \$185,730
KY004000001 Sidewalk repair, replace back decks, replace exterior doors \$178,985
KY004000002 Fencing Repair \$4657
KY004000003 Fencing Repair/Replacement, replace exterior doors \$161,036
KY004000004 Call System, security cameras, fencing repair \$114,443
KY004000007 Replace interior & exterior lighting, fence repair/replacement \$146,346
KY004000010 Parking Lot Repair, Fencing Replacement, ION Monitoring \$78,413
KY004000011 Parking Lot Repair, Fencing Replacement, replace kitchen countertops & cabinets, replace shower stall doors, \$52,255
KY004000012 Parking Lot Repair \$6203
KY004000013 Sidewalk repair, dumpster replacement, interior hallway painting, ION Monitoring \$155,130

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

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	10752	896
MTW Housing Choice Vouchers (HCV) Utilized	30144	2512
Local, Non-Traditional: Tenant-Based^	5232	436
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	46128	3844

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

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

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

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

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	Connie Griffith Apartments underwent voluntary conversion to PBV from public housing during FY2020 is currently being reoccupied and not at full occupancy at the start of FY2021
Local, Non-Traditional	N/A

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

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Regional Waiting Lists	2821	Partially Open	Yes
Housing Choice Voucher	Community Wide	922	Closed	Yes
PBV	Centre Meadows	1254	Partially Open	Yes
PBV	Connie Griffith	43	Open	Yes
Local, Non-Traditional MTW Assistance	Program Specific	N/A	Open	Yes

Please describe any duplication of applicants across waiting lists:

There is duplication across all available waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

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

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

III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

Activity # 27 – HCV PORTABILITY RESTRICTIONS

A. Activity Description

i. Proposed Activity Description

The LHA proposes to limit portability for work-able HCV participants to encourage self-sufficiency and serve more participants. Upon implementation, incoming and outgoing portability requests will be allowed for reasons related to employment, educational opportunities, medical/health reasons, or extenuating family circumstances. Although, HCV participants seek the voucher because it offers more choice, that choice often creates unintended consequence of a household moving to a jurisdiction where housing costs greatly exceed local housing costs, leaving the initial PHA, in some cases, paying much more subsidy had the household not ported out. Non-workable (elderly and disabled) households are excluded from this activity.

LHA staff sees this activity as a way to combat several issues related to portability that will:

- Reduce costs in Housing Assistance Payments (HAP) and encourage employment
- Allow more families to be served locally by restricting ports in/out

The proposed activity requires:

LHA will only allow ports (in or out) for work-able households if the head/co-head of household is employed a minimum of 20 hours per week on average with at least a six (6) consecutive-month work history, or gaining new employment in LHA's jurisdiction.

Portability for work-able households will be considered on a case-by-case basis for reasons related to education, medical and/or disability reasons, long-term care, extenuating family circumstances, VAWA related reasons, etc. Housing Assistance Payments (HAP) paid for working households is less than that for households with no employment.

ii. Statutory Objectives Achieved

LHA staff believes implementation of this activity will reduce cost by encouraging employment that will subsequently reduce HAP paid by the LHA. This savings in HAP will allow LHA to assist more families locally offering them choice to select housing in neighborhoods with lower poverty, better schools and better employment opportunities.

iii. Implementation Schedule

Starting January 1, 2021 all work-able families requesting portability in/out of LHA jurisdiction will be held to these requirements. Elderly and disabled

households are exempt from this activity and will continue to be governed by traditional portability rules.

B. Activity Metrics

CE#1: Agency Cost Savings			
Unit of Measure: Total cost of task in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	TBD
\$416 Per Household Actual Average Monthly HAP Payment	\$408 Per Household Expected Average Monthly HAP Payment	Actual Monthly HAP Payment TBD	

CE #2: Staff Time Savings			
Unit of Measurement: Total time to complete the task in staff hours (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
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 total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
3 hours	2.5 hours	TBD	TBD

CE#5: Increase in Agency Rental Revenue			
Unit of Measure: Housing Assistance Payment on behalf of affected households (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Housing Assistance Payment (HAP) paid for households affected by this activity prior to implementation of the activity (decrease).	Expected HAP paid for households affected by this activity to implementation of the activity (decrease).	Actual HAP paid for households affected by this activity to implementation of the activity (decrease).	TBD
----- Average HAP for porting clients = \$416 Time to manage port clients: Port outs = 3 hours Port Ins = 3 hours	----- Expected average HAP for porting clients Time to manage port clients: Port outs = 2.5 hours Port Ins = 2. hours	----- Actual average HAP for porting clients Time to manage port clients: Port outs = TBD Port Ins = TBD	

SS#1: Increase in Household Income			
Unit of Measure: Averaged earned income of households affected by this policy in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars(increase). ----- Average earned income of porting clients = \$9,628	Expected average earned income of households affected by this policy in dollars(increase). ----- Expected average earned income of porting clients = \$10,109	Actual average earned income of households affected by this policy in dollars(increase). ----- Actual average earned income of porting clients = TBD	TBD
SS#3: Increase in Positive Outcomes in Employment Status			
Unit of Measure: Number of Employed Work-Able Portability Households			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Heads of Household Employed prior to implementation of the activity (number).	Expected Heads of Household Employed prior to implementation of the activity (number).	Actual Heads of Household Employed prior to implementation of the activity (number).	TBD
Number of work-able employed heads of household.	Expected number of work-able employed heads of household.	Actual number of work-able employed heads of household.	
81	70	TBD	

C. Cost Implications

- i. LHA believes cost implications would be positive allowing LHA to pay less HAP for employed households requesting to port in/out.
- ii. LHA does not believe the proposed activity will result in added cost. Any cost savings will allow LHA to serve more HCV households.

D. Need/Justification for MTW Flexibility

- i. D. 1. g. The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. *This authorization waives certain provisions of Section 8(r) of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the Agency's Annual MTW Plan.*
- ii. To implement the proposed activity, LHA will establish portability policies that differ from the traditional portability policy.

Activity 28 – HCV Alternate Certification Schedule

Activity Description

i. Proposed Activity Description

LHA staff proposes to continue certain components of the HCV Rent Reform Study that began in 2015 and concludes in FY2021. The Study offered HCV participants an alternative recertification schedule of every three years rather than annual certification of income. The Study participants were not required to report increases in income during the three years.

LHA will implement the following:

- Calculation of deductions and allowances are eliminated in the determination of annual income.
- The TTP rent calculation will be determined by establishing gross annual income and then determining the greater of 28% of the gross annual income or the minimum rent of \$150.
- LHA will eliminate the verification and calculation of income earned from household assets with a total value less than \$25,000. Households would not be required to document assets worth less than that amount.
- To establish annual gross income for the three-year certification period, LHA will review the total household income without deductions for the twelve-month period prior to recertification, i.e., the “Retrospective Gross Income.” A household’s TTP will depend on its Retrospective Gross Income during a 12-month “look back” period.
- At the certification, if a household’s current/anticipated annual gross income is less than its retrospective income by more than 10%, a “temporary” TTP based on current income alone will be set for six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average retrospective gross income. No interim recertification interview would be required to reset this TTP. If the current income has not increased after the six-month grace period, the household may request a hardship. The hardship would not reduce the TTP less than the LHA’s minimum rent of \$150 for 90 days.
- HUD places a rent maximum for households moving into a new unit under the housing choice voucher subsidy. This maximum rent burden is determined to be 40% of the household’s current adjusted annual income. A participant’s initial rent burden will be the greater of:
 - 40 percent of gross current monthly income, or
 - the \$150 minimum rent for the family share when the family first receives voucher assistance in a particular unit. (This maximum

rent burden requirement is not applicable at reexamination if the family stays in place.)

- Triennial re-certification will review program eligibility, household composition, income and other household circumstances. Additional re-examinations (“interim certifications”) may be required for changes in the household situation such as: composition, income, and change in unit. LHA will continue to use a local form to supplement the HUD form 9886 to provide tenant consent for LHA to collect information relevant to the triennial recertification period, reflecting a 36-month term between certifications.
- Gross income will exclude any prior income from sources that have expired for the household during that period, such as TANF or Unemployment Insurance benefits, since the household can no longer count on them. It will include imputed welfare income – i.e., any sanctioned portion of a household’s TANF grant). Income from household members removed from the voucher will also be excluded from the review of retrospective income.
- If the household has an increase in income between certifications, the household’s TTP will not be re-determined and increased to reflect the higher income. However, if the household has a decrease in income, the household may request and LHA may provide an interim re-certification. The interim re-certification will be conducted when a household has a reduction of income of more than 10% from the retrospective income.
- LHA interim certification will re-calculate the household Total Tenant Payment (TTP) based on a new retrospective income review to determine the greater of 28% retrospective gross income or the minimum rent of \$150. This new TTP will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. Changes to household composition will not be counted towards the limit of one requested interim certification per year.
- LHA will implement a new voucher size (payment standard subsidy size) effective with interim certifications that reports a change in family composition (either adding or removing a member that would result in a payment standard change). Current HUD regulations require that if a family’s voucher size changes between regular reexaminations, the new voucher size and payment standard will be changed when the family moves or at the next regular reexamination after the change, whichever comes first.

The LHA's triennial certification policy dictates that when a participant reports a family composition change that decreases their voucher size the family may be over housed and LHA pays a higher assistance for a longer period of time. Also, increases in the family's voucher size, may cause a family to pay a higher rent portion for a longer period of time. This means that if at any time between recertifications (regardless of whether it is annual or triennial), a family has a change in composition, the family needs to report the change and an interim will be processed for the household composition change and the voucher size adjusted with the corresponding payment standard.

- At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP. If the loss of a household member results in a reduction of more than 10% of the most recent retrospective income, the household will be allowed to reset their TTP.
- In the event that the new or removed member requires a change to the voucher bedroom size, LHA will review the retrospective income of the newly added or removed household members, apply a new utility allowance, and will reset the household TTP. A reduction in subsidy for new voucher bedroom size will be upon the sooner of either the next triennial recertification or move to a new unit.
- Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, LHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. If a family has a change in composition, the household composition change and the voucher size will be adjusted with the corresponding payment standard.
- Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:
 - move to a new unit,
 - at certification and the TTP is recalculated during interim or triennial,

- Move to new units, or
 - change their household composition requiring a change in voucher size.
- Tenant Rent to Owner will be equal to the TTP (plus any amount over the payment standard) less the Utility Allowance. In the event that the TTP less Utility Allowance is less than the minimum rent of \$150, the participant will pay the Minimum Rent to Owner and LHA will reimburse the household the remainder of the Utility Allowance. The total amount of rent will equal the contract rent established in the lease. This policy mirrors the market system of tenants paying owners directly and creates a closer relationship and sense of responsibility for both the leaseholder HCV household and the property owner.
 - Currently, LHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents the reasonable expectation of costs for utilities as part of the tenant's lease.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from LHA's existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule was used in the Study and implemented upon the triennial certification or change of unit. LHA proposes to use the simplified schedule used in the Study.

Excluded Voucher Participants

LHA Special Partner programs (partners identified in MTW activities 10 & 12)
 Elderly and Disabled
 Family Self-sufficiency (FSS)
 Households that contain a mix of eligible and non-eligible household members

ii. Statutory Objectives Achieved

By allowing families to keep income increases during the three-year period families receive an opportunity to achieve greater self-sufficiency as well as greater housing choice opportunities

iii. Implementation Schedule

The HUD-commissioned Rent Reform Study will end June 30, 2020. This activity will be implemented July 1, 2021 for all MTW-eligible HCV households (excluding elderly and disabled households).

B. Activity Metrics

LHA plans to use the agency's software database and LHA staff input to report on the following HUD standardized metrics.

CE#1: Agency Cost Savings			
Unit of Measure: Total cost of task in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	TBD
\$563 Average Monthly HAP Payment	\$450 Expected Monthly HAP Payment	TBD	

CE #2: Staff Time Savings			
Unit of Measurement: Total time to complete the task in staff hours (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
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 total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
1.5 Hours Total amount of staff time to complete Annual Certification prior to implementation of the activity (in hours).	1 Hour Expected amount of staff time to complete Annual Certification after implementation of the activity (in hours).	TBD Actual amount of total staff time dedicated to complete Annual Certification after implementation of the activity (in hours).	TBD

CE #5 Increase in Agency Rental Revenue			
Unit of Measure: Total Household contributions towards housing assistance (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Household contributions prior to implementation of the activity (in dollars).	Expected household contributions after implementation of the activity (in dollars).	Actual household contributions after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average Tenant Rent Contribution \$290	Average Tenant Rent Contribution \$325	TBD	TBD

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<i>SS #1: Increase in Household Income</i>			
Unit of Measurement: Average earned income of households affected by this policy in dollars (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy 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.
Baseline is equal to: Average Earned Income of Work-Able households \$19,572	Benchmark is equal to: Annual increase of 2% in the Average Earned Income of Work-Able households \$19,963	TBD	TBD
		Average Earned Income of Work-Able households	Explanation to be provided

<i>SS #3: Increase in Positive Outcomes in Employment Status</i>			
Unit of Measurement: Employment Status – Households Reporting Earned Income			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Head(s) of households in categories identified below prior to implementation of the activity. This number may be zero.	Expected head(s) of households in the categories identified below after implementation of the activity.	Actual head(s) of work-able households in categories identified below after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
1,112 of 1,599	1,151 of 1,599	TBD	TBD
Actual head(s) of work-able households employed - reporting earned income	Expected head(s) of households reporting earned income	Actual head(s) of work-able households in categories identified after implementation of the activity.	Explanation to be provided

<i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i>			
Unit of Measurement: Number of households receiving TANF assistance (decrease)			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Households receiving TANF prior to implementation of the activity	Expected number of households receiving TANF after implementation of the activity	Actual households receiving TANF after implementation of the activity	Whether the outcome meets or exceeds the benchmark
36 of 1,599 households	30 of 1,599 households	TBD	TBD
Baseline is equal to: Number of Households Receiving TANF Benefits of total population	Benchmark is equal to: Expected reduction of Households Receiving TANF Benefits	Actual households receiving TANF benefits	Explanation to be provided

<i>SS #8: Households Transitioned to Self-sufficiency</i>			
Unit of Measurement: Number of households transitioned to self-sufficiency (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Households transitioned to self-sufficiency (as defined above) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (as defined above) after implementation of the activity	Actual households transitioned to self-sufficiency after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
640 of 1,599	672 of 1,599	TBD	TBD
Actual number of work-able households transitioned to self-sufficiency per Year	Expected number of work-able households transitioned to self-sufficiency	Actual number of work-able households transitioned to self-sufficiency after implementation of activity	Explanation to be provided

C. Cost Implications

The cost benefit of this activity will be demonstrated if participants are able to achieve higher earnings, thereby reducing the amount of subsidy.

Administrative cost savings to LHA will be achieved by conducting certifications every three years as opposed to annually.

D. Need/Justification for MTW Flexibility**Operational Policies and Procedures**

Authorization: Attachment C, Section D. 1 (c) provides LHA flexibility to define Operational Policies and Procedures. LHA may define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act. This provision waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516.

This flexibility is necessary to establish a triennial certification and revised interim certification schedule as part of the rent reform activity. Local forms will be used to adapt the 9886 to reflect a 36-month term between certifications.

Rent Policies

Authorization: Attachment C, Section D. 2 (a) Rent Policies and Term limits. LHA is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program...waives Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H) – (I) of the 1937 Act and 24 C.F.R. 982.508; 982.503 and 982.518.

This authorization is necessary for the provision to set minimum rent, elimination of deductions and allowances, using a percent of gross income to calculate TTP, setting the maximum initial rent burden to 40% of gross income and a simplified utility schedule as components of the rent reform activity.

Eligibility of Participants

Authorization: Attachment C, Section D. 3 (b) Eligibility of Participants. LHA is authorized to adopt and implement any reasonable policy for verifying household income and composition and for determining resident eligibility that differ from the current mandated program requirements. This provision waives provisions 24 CRR 982.516 and 982 Subpart E.

This authorization is necessary for the provisions to simplify rent calculation by eliminating income from household assets valued less than \$25,000; eliminating deductions and allowances and to use household gross income to set the TTP. IV.

IMPACT ANALYSIS

1. Simplified Rent Calculation

This activity will provide LHA with immediate savings of staff hours through an easier calculation in regular certification meetings and interim recertification meetings and save staff from having to detect and correct errors in calculating adjusted income. Also this will increase transparency of how the tenant's share of shelter costs is computed.

2. Triennial Certification

This activity will provide LHA with immediate savings of staff hours and save tenants time as well through having fewer recertification meetings and income verifications. Also for tenants this will act as a powerful incentive to increase employment and earnings; tenants will be able to increase earnings between regular certifications without increases in their TTP and without having to report these increased earnings to LHA.

3. Streamline Interim Certification

This activity will provide LHA with savings in staff hours through eliminating income verification in some instances that would require it now. Also the streamlined certifications help to maintain the employment and earnings incentive offered in the 3-year recertification schedule.

4. Minimum Rent to Owner

This activity will increase self-sufficiency of tenants by establishing a traditional tenant-landlord relationship in which all tenants will be required to pay some portion of the rent directly to the landlord. This also may help with housing quality by establishing a traditional relationship where the tenant and landlord are interacting more and make the tenant feel more able to ask for repairs on the unit.

5. Simplified Utility Allowance

This activity will provide LHA with cost savings from staff hours spent calculating utility allowances for each household and save time from detecting and correcting errors made when using a more complex utility schedule. This will also increase the transparency of the utility allowance calculation, enabling a better understanding of how their total subsidy is calculated.

HARDSHIP POLICY

The alternative certification schedule is not intended to create an undue burden on the program participants. The Hardship Policy was created to address burdened households.

- Hardship Waiver Request Process

The process for requesting a waiver will be as follows:

- 1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to Housing Assistant Specialist.
- 2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.
- 3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 90 days.
- 4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 7-day notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 7-day notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

- Hardship Waiver Criteria

LHA may determine a financial hardship exists when the household cannot pay the minimum rent or has an excessive rent burden. Households will be considered for a hardship waiver, as discussed below, if:

- 1) The hardship cannot be remedied by the one interim recertification permitted each year (which cannot reduce a household's TTP below the minimum level).
- 2) The household is at an income level or experiences a loss of income and/or a TTP increase such that its total monthly TTP exceeds 40% of its current monthly gross income and is greater than the \$150 minimum rent. The gross income will include imputed income in the same manner as current calculations.

- 3) The household faces risk of eviction for non-payment of rent – including utility shut-offs for non-payment of utility bills that could lead to eviction.
- 4) Other circumstances as determined by the housing agency.

Activity Implementation

Prior to July 1, 2021, LHA will send informational notices to all work-able participants to introduce the activity and the requirements. The LHA's website will offer information on the activity as well as a series of meetings or a web presentations, should the COVID-19 pandemic not allow face-to-face meetings. Approximately one-fourth of the LHA's HCV participants are active participants in the Rent Reform Study, therefore that population will be familiar with activity requirements.

Enrollment of Participants

1) Prior to Certification Meeting

Selected Program Participants will receive special information with their recertification package to introduce them to the rent reform policies and to answer household questions. LHA will conduct the triennial certification at the time otherwise scheduled for the household annual certification.

2) During Certification Meeting

At the initial triennial certification, the household will have the changes in rent reform policies explained to them. Changes in the household share, TTP, utility schedule allowance will be provided to the household with no less than 30 days' notice.

3) Mitigation of impact at initial triennial certification

A "grace period" of six months will be provided to mitigate the impact of the transition for the following two cases:

- a) At the triennial certification at the beginning of the three-year period (and at subsequent triennials), if a household's current/anticipated income is less than its retrospective income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period.
- b) At the initial triennial certification only, if a household's childcare expense is above \$200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the \$200 to create a "temporary" TTP for a six-month grace period.

After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.

Activity Tracking

LHA will review the rent reform activities annually and will report its findings to HUD in the yearly MTW Report. Because certain activities will be conducted on a triennial basis, not all information may be presented each year. However, LHA will report on the following:

- Hardship requests and determinations
- Interim certifications for loss of income
- Program departures
- HAP Expenditure

- Hardship Review Process

- 1) The administrative review of the household circumstances will be conducted by LHA according to current review processes.
- 2) For hardship claims related to imminent risk of eviction, LHA will conduct an expedited hearing process.
- 3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing agency's normal grievance procedures.
- 4) LHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

- Hardship Remedies

- 1) The Hardship remedies may include any of the following:
 - a) Allowing an additional interim recertification beyond the normal one-per-year option. This could lower household's TTP (but only as low as the \$150 minimum TTP) until the next triennial recertification.
 - b) Setting the household's TTP at the minimum level for up to 180 days.
 - c) Setting the household's TTP at 28 percent of current income (but no lower than the \$150 minimum rent), for up to 180 days.
 - a) Offering a "transfer voucher" to support a move to a more affordable unit (including a unit with lower utility expenses).
 - e) A specific time frame for the temporary TTP or minimum rent may be established for longer than 180 days based on specific circumstances. However, the time frame will never go pass the triennial recertification date.
 - f) Any combination of the above remedies.

- 2) During the period when the TTP is reduced, the Housing Authority will increase its payment to the landlord to cover the portion of the rent previously paid by the tenant directly to the landlord, and it will notify the landlord of the change and the time period of the increased payments.
- 3) In addition to the remedy or remedies offered, the household may be referred to federal, state or local assistance programs to apply for assistance, or to obtain verification that they are ineligible to receive benefits.
- 4) The Hardship remedies are subject to the following limitations:
 - a) The tenant portion of the rent payments will not be suspended prior to a hardship designation.
 - b) Remedies will not affect any rent attributable to a gross rent that exceeds the applicable payment standard.
 - c) Opting out of the alternative rent policy is not a remedy option.

- End of Hardship Waiver Period

- 1) If the hardship continues, the household may submit a request for an extension of the hardship remedy. However, the time frame will never go past the triennial recertification date.
- 2) At the end of the hardship waiver period, the household's regular TTP will be reinstated.

Activity 29 – Contract Amendments to Remove or Add Units at LHA-Owned Project-Based Voucher Units

A. Activity Description

i. Proposed Activity Description

Currently LHA-owned project-based voucher (PBV) units occupied by families where there has been no subsidy due to an increase in a tenant's income must be removed from the Housing Assistance Payment (HAP) contract, 180 days after the last housing assistance payment on behalf of the family. LHA's PBV units are fully assisted, therefore, LHA can only add the units back to the contract when the family moves out of the unit

LHA proposes that contract units previously removed, due to an increase in a tenant's income, can be added back to the HAP contract if the family residing in such a unit should have a decrease in income that causes HAP to resume at any point during the family's tenancy of the PBV unit. Therefore, the household would receive a subsidy preference over families on the waiting list.

ii. Statutory Objectives Achieved

This activity will increase housing opportunities for low to extremely low-income participants.

iii. Implementation Schedule

Upon approval of the FY2021 MTW Annual Plan, LHA will implement this activity.

B. Activity Metrics

Data will be compiled from tracking over-subsidy end of participation (EOP) and new admissions report.

<i>SS #1: Increase in Household Income</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average Earned Income of Non-Elderly Non-disabled Households	\$11,836	\$12,309	TBD	TBD
	Average Earned Income of Work-Able households	Average Earned Income of Work-Able households	Average Earned Income of Work-Able households	Explanation to be provided

<i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i>			
Unit of Measurement: Number of households receiving TANF assistance (decrease)			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Households receiving TANF prior to implementation of the activity	Expected number of households receiving TANF after implementation of the activity	Actual households receiving TANF after implementation of the activity	Whether the outcome meets or exceeds the benchmark
8	6	TBD	TBD

<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>			
Unit of Measurement: Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$486 average subsidy per household affected by this policy prior to implementation of the activity.	\$462 Expected average subsidy per household affected by this policy after implementation of the activity.	TBD	TBD

<i>SS #7: Increase in Agency Rental Revenue</i>			
Unit of Measurement: Total Household contributions towards housing assistance (increase).			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Household contributions prior to implementation of the activity (in dollars).	Expected household contributions after implementation of the activity (in dollars).	Actual household contributions after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$150 Average household contribution toward rent prior to implementation of the activity	\$173 Expected average household contribution toward rent	TBD Actual household contributions after implementation of the activity.	TBD

<i>SS #8: Households Transitioned to Self-sufficiency</i>			
Unit of Measurement: Number of households transitioned to self-sufficiency (increase). Self-sufficiency = \$7.25 (minimum wage @ 40 hours per week for 53 weeks - \$15,370)			
Baseline	Benchmark	Outcome	Benchmark Achieved?
Households transitioned to self-sufficiency (as defined above) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (as defined above) after implementation of the activity	Actual households transitioned to self-sufficiency after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
92 of 287	97 of 287	TBD	TBD
Baseline is equal to: Work-Able Households Transitioned to Self-sufficiency per Year	Benchmark is equal to: Expected number of work-able households transitioned to self-sufficiency	Actual number of work-able households transitioned to self-sufficiency after implementation of activity	Explanation to be provided

C. Cost Implications

There are cost implications for renewal funding from HUD for allowing households not receiving HAP to continue occupancy of LHA-owned PBV units and there are cost implications related to the time it takes to lease a unit, the higher vacancy rate and the administrative burden. Thus, this activity will be monitored to ensure it is cost neutral to the program.

D. Need/Justification for MTW Flexibility

The LHA requests authorization to implement this activity under the following section of the MTW Agreement: • Attachment C, Section D. 2 Eligibility of Participants

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

A. Implemented Activities

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

i. Plan Year Approved, Implemented, Amended

Activity_Proposed FY 2012 – FY 2013 for Pimlico Apartments / Implemented May 1, 2012; Activity Expanded FY2014 to all Public Housing Units and HCV Units / Implemented April 1, 2014

ii. Description/Update

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

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

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

ii. **Description/Update**

Providing HCV rental assistance to special partners that provide social services in the community is crucial to addressing the unique issues of at-risk populations. The LHA currently provides voucher assistance to a maximum of 32 participants for the Bluegrass.org, Community Action Council (CAC) and Arbor Youth Services.

Bluegrass.org (22 vouchers) provides wraparound services for persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services. CAC (10 vouchers) provides case management to Foster Care youth aging out of the system. Arbor Youth Services three (3) vouchers to youth between 18 and 24

Arbor Youth Services will be provided funding for three (3) vouchers, thereby reducing CAC's funding from ten (10) to seven (7) units. CAC has not leased the maximum ten units since the activity as implemented. Arbor Youth Services helps youth who are between 18 and 24 years of age who are experiencing homelessness transition into housing.

This activity permits the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance. While LHA hopes the majority of these families will subsequently seek unsubsidized housing in the private market, these households will also be eligible to apply for public housing or another HCV voucher (including Family Self-Sufficiency vouchers) through the Authority's normal application procedures. The LHA will report on this activity in the next annual Plan.

iii. **Planned Non-Significant Changes**

The LHA will allow participants served through CAC to have a minimum rent of \$0, opposed to the agency-wide minimum rent of \$150.

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

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

v. **Planned Significant Changes**

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

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

The Housing Authority provides a fixed monthly rental subsidy to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 436 families with special needs. HCV staff has signed Memoranda of Understanding (MOUs) in with each special partner program.

Special Partner Program	Households Served	# of Vouchers
Canaan House	Individuals who have been diagnosed with mental illness	17
Greenhouse 17	Victims of domestic violence, dating violence, sexual assault and stalking	25
Hope Center	Persons who have substance abuse problems and are in need of voluntary or court-mandated treatment	192
New Beginnings	Individuals who have been diagnosed with a mental illness	29
Oasis Rental Assistance	Families in need of financial literacy, credit management and homeownership resources	30
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80
Serenity Place (Chrysalis House)	Parents with children: who have recently been released from jail or are homeless	40
Urban League	Elderly	23
	Totals	436

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

Activity 13: Local Self-Sufficiency Admissions and Occupancy Requirements

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

The majority of the LHA's housing stock are designated as Self-Sufficiency (SS) I or Self-Sufficiency (SS) II housing which requires households at these sites to work 20-hours (SS I units) or 37.5-hours (SS II units) per week depending on the site. If the household loses employment, they are subject to rent based on imputed income at 20 or 37.5 hours, multiplied by the federal minimum wage for 52 weeks. The LHA's PBV site, Centre Meadows (CM), a 206-unit family site, is included in this activity and households at CM are required to work at least 20 hours per week or households are subject to imputed income for those households not working; 878 public housing units are designated as SS I or II. Elderly and disabled households are excluded from this activity and families who lose income through no fault of their own may submit a hardship request. This activity is ongoing.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

Activity 14: Rent Reform: Elimination of Earned Income Disallowance

i. Plan Year Approved, Implemented, Amended

Activity Proposed, Approved, and Implemented – FY2015 Plan

i. Description/Update

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

ii. Planned Non-Significant Changes

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

iii. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

Activity 16: HCV Rent Reform Study**i. Plan Year Approved, Implemented, Amended**

Approved, and Implemented – FY2015

ii. Description/Update

In July of 2018 the LHA saw the first triennial recertifications for the HCV Rent Reform study group participants. The policy substitutes triennial recertification of a households' income for annual recertification and it is not necessary for study group participants to report increases in income. The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study will conclude June 30, 2021 (FY2021). A new activity is introduced for FY2021 that will continue several components of the Study for all regular HCV participants.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

LHA staff is working with MDRC to create a schedule for closing out the Study and transitioning participants by the end of FY2021. LHA plans to continue many of the policies from the Study in a new activity that will be proposed in an amended FY2021 Plan in late 2020.

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

Proposed, Approved and Implemented FY2016

ii. Description/Update

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

Proposed, Approved and Implemented FY2017

ii. Description/Update

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented, Amended

Proposed, Approved and Implemented FY2017

ii. Description/Update

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

To date, four participants are housed through this program.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented, Amended

Proposed, Approved and Implemented FY2017

ii. Description/Update

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval to implement reexaminations every three (3) years for Housing Choice Voucher (HCV) Homeownership households by conducting income reexaminations every three (3) years. Triennial recertification has proved successful for HCV elderly disabled on fixed incomes. Staff sees minimal changes in income for the homeownership households in the Housing Choice Voucher program. This activity is ongoing. The elimination of these annual certifications has allowed for more time for HCV specialist to devote to other programs. The LHA currently has 32 homeownership participants.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

Proposed, Approved and Implemented FY2018

ii. Description/Update

The Lexington Housing Authority received approval in the FY2018 Plan to test time-limited housing assistance for work-able new admissions to the HCV Program for

five (5) years with a potential two (2) year extension. Elderly households are exempt from this activity.

Work-able new admission participants will be subject to:

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

Currently, 23 participants are under lease. The LHA's enrollment process pulls HCV applicants from the waiting list and calls those applicants in for an interview to determine their suitability for the program. Once an applicant is deemed suitable for the program the verification of eligibility begins. Seventy-five percent of applicants interviewed and selected for the eligibility process were terminated or withdrew prior to enrollment. Reasons applicants were not accepted to the program include, negative/unacceptable background checks, over-income and no shows for eligibility appointment.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

Approval Date: FY2019

Description/Update

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

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

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

i. Plan Year Approved, Implemented

Proposed and Approved FY2020

ii. Description/Update

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

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

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

i. FY2020 (Amended Plan)

ii. Description/Update

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

CGA tenants were concerned that they were being forced to move or that their rent was going to increase. This activity provides residents of the CGA rent and eligibility protections post-conversion that they would not have under the HVC program. Even if CGA resident was over income post-conversion, this initiative provides for their protection in that instance with phased incremental increases in rent should the resident be over-income. It is consistent with the information provided during the voluntary conversion process and provides additional tenant protections.

iii. Planned Non-Significant Changes

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

iii. Planned Changes to Metrics/Data Collection

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

vi. 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.

Proposed Rent and Eligibility Protections

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

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

rent would increase to bring the resident to current contract/gross rent (see example below);

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

i. Update

To date, ?? CGA households

ii. Timeline for Implementation

iii. Explanation of any non-significant changes or modifications to the activity since it was approved

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

B. Activities Not Yet Implemented

Activity #7: Public Housing Acquisition Without Prior Approval

Approval Dates: FY2012-2013 Plan

Description

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

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

- i. **Update**
The LHA does not anticipate acquiring any public housing properties during FY2021 where it was necessary to implement this activity.
- ii. **Timeline for Implementation**
The LHA will develop a timeline for this activity during FY2021 should the Authority decide to acquire public housing units or land for the development of public housing.
- iii. **Explanation of any non-significant changes or modifications to the activity since it was approved**
The LHA does not anticipate any non-significant changes or modifications to this activity during FY2021.

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

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

Description

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

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

i. Update

Should HUD issue a NOFA during FY 2021 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.

ii. Timeline for Implementation

Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.

iii. Explanation of any non-significant changes or modifications to the activity since it was approved.

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

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

Approval Dates: FY2012-2013 Plan

Description

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

i. Update

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

ii. Timeline for Implementation

The LHA will develop a timeline for this activity during the Plan year should the Authority decide to develop the Edmond Street property.

iii. Explanation of any non-significant changes or modifications to the activity since it was approved

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

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

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

Description

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

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

- i. **Update**
Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a tax-credit entity until October 20, 2015 when the property exited tax credit compliance and is now solely owned by the Ballard, LLC, an LHA controlled entity. The LHA successfully completed Voluntary Conversion for Connie Griffith Towers during FY2020.
- ii. **Timeline for Implementation**
The LHA will develop a timeline for this activity during the Plan year should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.
- iii. **Explanation of any non-significant changes or modifications to the activity since it was approved**
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activities on Hold

N/A

C. Closed Out Activities

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

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

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

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

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

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

Activity 5: Streamlined HQS Inspection Policy for Housing Choice Voucher Program Plan Year Approved, Implemented, Amended Activity Proposed FY 2012 – FY 2013 Plan /Significantly Modified FY2014 Plan/Implemented FY2015 (Closed out FY2021)

The LHA chose to close out this activity allowing Housing Quality Standards (HQS) inspection intervals between 12 months and 36 months based on a landlord's star-rating. LHA staff feels that since the enactment of PIH-Notice 2016-05 Streamlining Administrative Regulations for Programs Administered by Public Housing Agencies allowing for biennial inspections and the use of alternative inspection methods and inspection timeframes, this activity is no longer necessary. The majority (91%) of LHA's 800+ HCV landlords were assigned to the 2-star rating of every two years, therefore, staff felt that the initiative was no longer necessary.

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

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

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

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

V. SOURCES AND USES OF MTW FUNDS

(V) SOURCES AND USES OF MTW FUNDS		
<u>ANNUAL MTW REPORT</u>		

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$7,298,117
70600	HUD PHA Operating Grants	\$26,803,318
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,890,035
71100+72000	Interest Income	\$270,431
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$327,916
70000	Total Revenue	\$36,889,817

ii. Estimated Uses of MTW Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$5,231,685
91300+91310+92000	Management Fee Expense	\$1,890,035
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,903,866
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,894,163
95000 (95100+95200+95300+95500)	Total Protective Services	\$365,473
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$573,774
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$371,618
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$21,630,646
97400	Depreciation Expense	\$1,618,348
97500+97600+97700+97800	All Other Expense	\$138,944

90000	Total Expenses	\$37,618,552
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Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

Variance is Depreciation Expense less budgeted surplus for year.

iii. Description of Planned Use of MTW Single Fund Flexibility

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

The LHA will use single-fund fungibility by transferring excess cash reserves from Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/20 per our audited report to be utilized for a number of projects. Those projects would include but not be limited to: development of land adjacent to our recently developed site which includes 11 units at Glen Arvin Avenue; Ballard Apartments, a senior designated high-rise that has been awarded 9% tax credits which may need additional funding for cost overruns related to the renovation; possible tax credit funding and source of funds to meet rehab needs for Connie Griffith, LLC a recently converted site from Public Housing to Project Based Section 8 via a Voluntary Conversion. In addition, this flexibility may be necessary to take advantage of existing or new construction development opportunities as well as resident programs that promote self-sufficiency. Continued professional development of staff is important as demonstrated with our recent implementation of the Leadership Academy. The agency has begun a review of our entire portfolio to consider options under the asset repositioning plan to take full advantage of our single-fund fungibility.

B. LOCAL ASSET MANAGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

Yes

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

No

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

No

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

The LHA is not implementing a LAMP

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

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

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

<p>The Lexington Housing Authority (LHA) applied for participation in the United States Department of Housing & Urban Development's (HUD) Rental Assistance Demonstration in October of 2012. On December 14, 2012, the LHA was notified of approval of the application for conversion of 206 public housing units at Pimlico Apartments to Project Based Vouchers (PBV). LHA fulfilled its obligation to remove 206 dwelling units from KY004000012 Pimlico Apartments in the Inventory Management System / PIH Information Center (IMS/PIC) which were converted to RAD Project Based Vouchers. The dwelling units consisted of the following: 44 one-bedroom units, 128 two-bedroom units, and 34 three-bedroom units. LHA acknowledges that the removal of the identified units from IMS/PIC was a material requirement and condition of HUD's approval of its Rental Assistance Demonstration (RAD) application for the project.</p>

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| <ul style="list-style-type: none"> • <i>RAD Conversion Commitment 2nd Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</i> • <i>RAD Conversion Commitment Final Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</i> • <i>RAD Post-Closing Corrective Amendment issued by HUD on April 5, 2018</i> |
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<p>The renovated site is now known as Centre Meadows with rents subsidized by HCV (Housing Choice Voucher PBV) assistance. Renovation began March 4, 2014 and by June 30, 2016 the overall project was 100% complete and all 206 dwelling units are being leased & occupied.</p>
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ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

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

N/A

VI. ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

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

**RESOLUTION TO APPROVE THE LEXINGTON HOUSING AUTHORITY'S FY 2021
MOVING TO WORK ANNUAL PLAN**

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

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

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

WHEREAS, the LHA's FY2020 MTW Annual Plan Technical Amendment was approved by HUD on May 1, 2020, as submitted on May 1, 2020, effective through June 30, 2020; and

WHEREAS, LHA has proposed four new activities in the FY 2021 MTW Annual Plan that will serve to increase housing choice for low-income families, encourage self-sufficiency or reduce cost; and

WHEREAS, the LHA has closed out one previously approved MTW activity that allowed for alternative inspection methods and inspection timeframes; and

WHEREAS, a Board Resolution approving the proposed FY 2021 MTW Annual Plan and required Certifications of Compliance that must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from July 20, 2020 through August 18, 2020 for the public to comment on the Plan, and has conducted a Public Hearing on August 4, 2020 to discuss the proposed Annual Plan before its submission to HUD,

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2021 MTW Annual Plan, effective July 1, 2020 through June 30, 2021, is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.



 Jean Whitman
 Chairperson, Board of Commissioners

August 20, 2020
 Date

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

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2020), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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Expiration Date: 01/31/2021

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

Lexington-Fayette Urban County Housing Authority**KY004****MTW PHA NAME****MTW PHA NUMBER/HA CODE**

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

Joan Whitman**Chair, Board of Commissioners****NAME OF AUTHORIZED OFFICIAL****TITLE***Joan Whitman***August 20, 2020****SIGNATURE****DATE**

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

B. DOCUMENTATION OF PUBLIC PROCESS

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

The public hearing announcement was posted on the LHA website (www.lexha.org) and the LHA Facebook page.



PUBLIC HEARING ANNOUNCEMENT

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: the proposed FY 2021 Moving to Work (MTW) Annual Plan; and revisions to the Housing Choice Voucher (Section 8) Administrative Plan.

The public hearing will be held on **Tuesday, August 4, 2020 at 5:30 PM** via Zoom video conferencing. Attendees may register in advance by calling Andrea Wilson at (859) 281-5060. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2021 MTW Annual Plan that includes four new activities and revisions to ongoing activities and proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan. The following is a summary of significant modifications:

FY2021 MTW Annual Plan New/Modifications Activities

- HCV –Payment Standard Subsidy Size Changes Between Regular Certifications
- HCV Portability Restrictions
- HCV Alternate Certification Schedule
- Contract Amendments To Remove Or Add Units At Lha-Owned Project-Based Voucher Units
- Close Out Activity #5 - Streamlined HQS Inspection Policy For HCV Units

HCV (Section 8) Administrative Plan Revisions

- Self-verification by landlords of non-life-threatening violations for re-inspections when family fails to allow entry for reinspection.
- Admin Plan change – voucher extension policy
- Admin Plan change – remaining member of household

LHA welcomes public comment regarding these changes from July 20 – August 18, 2020. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

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The following ad ran in the **Lexington-Herald Leader** July 20, 2020.

**PUBLIC HEARING A N -
NOUNCEMENT**
**Lexington-Fayette Urban
County Housing Authority
(LHA) will hold a Public
Hearing regarding: 1) the
proposed FY 2021 Moving
to Work (MTW) Annual
Plan; 2) and revisions to
the Housing Choice Vouch-
er (Section 8) Administra-
tive Plan.**

The public hearing will be held on **Tuesday, August 4, 2020 at 5:30 PM** via Zoom video conferencing. Attendees may register in advance by calling Andrea Wilson at (859) 281-5060. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2021 MTW Annual Plan that includes three new activities and revisions to ongoing activities and proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan.

LHA welcomes public comment regarding these changes from July 20 – August 18, 2020. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

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PUBLIC HEARING HELD VIA ZOOM VIDEO CONFERENCING

Due to the COVID-19 pandemic, the public hearing was held via Zoom video conferencing as public gatherings of more than ten people have been suspended based on order from the Governor of the Commonwealth of Kentucky. Interested parties were instructed to contact LHA staff for the sign-on credentials to join the meeting.

One person called in advance to join the Zoom video conference call, however that person did not call in on the date of the public hearing. No comments were received on the LHA's proposals. A screenshot of the public hearing participants is shown below. The public hearing was recorded and is available upon request.

LHA staff in attendance for the public hearing as pictured (from left to right):

Cathy Hall, Housing Manager

Andrea Wilson, Senior Manager of Housing Operations

Aldean Pleasant, HCV Manager

Austin Simms, Executive Director

Bill Garr, Maintenance Supervisor

Tom Smith, Lead Maintenance Supervisor

Barry Holmes, Chief Operating Officer

Carolyn Fish, Housing Manager

Tonya Christopher, HCV Assistant Manager

Sean Cooper, Chief Financial Officer



Certification of Payments to Influence Federal Transactions

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

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

Applicant Name

Lexington-Fayette Urban County Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

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

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

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

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

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

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

Name of Authorized Official

Austin J. Simms

Title

Executive Director

Signature



Date (mm/dd/yyyy)

11/20/2020

Previous edition is obsolete

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

C. Planned and Ongoing Evaluations

Dr. Amanda 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. At that time, she was employed by Kentucky State University but has since left the university.

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

Rent Reform Study (Activity 16)

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