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Lexington Housing Authority

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Lexington Housing Authority

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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 the first 39 MTW agencies until 2028. The submission of the FY2022 Annual MTW Plan marks the LHA's eleventh 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.

COVID-19 Update

As the COVID-19 virus continues to spread, LHA continues to respond to and address the resulting challenges. As reported in the previous plan, LHA offices continued to be closed to walk-in visitors however visitors are seen by appointment, while staff adheres to safety precautions when visitors are seen in person. Meetings are conducted virtually when possible and when meeting in person social distancing and wearing masks are required. Recertification of both public housing and Housing Choice Voucher clients are mainly conducted through phone interviews and mail.

LHA is using CARES Act funds to address the needs related to COVID-19 that include:

- Security cameras and controlled entry access at all housing management offices and the central offices
- Upgraded phone system that features remote access
- Computer hardware upgrade
- Removal of carpet replaced with vinyl flooring at offices to reduce allergens and bacteria
- Hiring temporary workers and part-time workers to address staffing shortages
- Purchased and implemented a web-based application for online recertifications, housing applications and waiting list management
- Production of videos for use on the LHA website that promotes agency programs
- Implementation of pay roll software that can be accessed online
- Drop boxes installed at all offices for document return

LHA continues to follow mandates and guidelines of federal and state officials in an effort to reduce the spread of the virus as well as educate staff and clients.

OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES

SHORT-TERM GOALS

Addressing Non-Payment of Rent

LHA has a housing stock of 914 public housing units, approximately 600 unassisted units and more than 3,500 Housing Choice Vouchers. Since March 2020, in response to the federal and state eviction moratorium LHA has not evicted for nonpayment of rent or assessed late fees. The federal eviction moratorium has expired. Funds are available to help households facing eviction with financial assistance through the state and local government. Lexington's city government has received more than \$9 million in federal dollars to assist households who cannot pay rent and utilities. LHA continues to encourage our clients to apply for the assistance to avoid eviction by sending notices promoting the assistance and helping clients complete the online application.

Emergency Housing Vouchers

The Lexington Housing Authority was notified by the HUD on May 10, 2021 of an award of seventy-six (76) Emergency Housing Vouchers (EHVs). The 76 vouchers are valued at \$621,780 in Housing Assistance Payment (HAP) (see EHV Policy in Appendix). The vouchers are provided to help assist individuals and families who are:

- homeless, at risk of homelessness or recently homeless
- fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

LHA has partnered with the Continuum of Care (CoC) program administered by the Lexington-Fayette Urban County Government's (LFUCG) Office of Homelessness Prevention and Intervention to administer the EHVs. The CoC will support individuals and families in completing applications and obtaining necessary supporting documentation to support referrals and applications for assistance, while aiding households in addressing barriers.

The LFUCG generously agreed to provide \$251,000 that will assist with security and utility deposits, utility arrearages and the landlord incentives. The following will be provided on behalf of EHV clients:

- A one-time \$500 incentive to landlords that agree to lease their unit to an EHV family
- PHA will increase Payment Standards to 120% of FMR
- Minimum rent for EHV households will be \$0
- Furniture and essential household items based on specific need of the EHV family

Nationwide, 70,000 EHVs were awarded to 696 PHAs.

Development at Race and Third Street

Plans for a new development are in process for a vacant lot that will offer six rental townhouse units (fair market) at Race and Third Streets located in downtown Lexington. LHA anticipates construction to begin in late 2021 pending zoning approval. This development is in close proximity to the HOPE VI development (former Bluegrass-Aspendale). The development is

located in an area that is currently undergoing revitalization with new residential and commercial opportunities. LHA anticipates completion in late 2022.

Shropshire Avenue Development

Plans are in the early stages to develop a remaining parcel of land that was left undeveloped following the demolition of LHA’s Bluegrass Aspendale housing complex in the early 2000s. LHA proposes multiple uses for the vacant parcel of land that include eleven single family homes, four townhouse units and an early childhood prep academy. LHA is seeking additional funding and a community partner to purchase and manage the childhood center.

Development at Versailles Road

Fifty-nine (59) units of affordable housing are planned for 1604 Versailles Road located in west Lexington. LHA purchased the property in September 2021. Plans for funding the construction of the units are pending. The property will be divided into 2 blocks - the north block from Versailles Road to Hill Rise Drive and the south block from Hill Rise Drive to Hill Rise Place. The north block will contain 12 apartment units, 23 townhouse units, 4 duplex units and 2 single family houses. The south block will feature 18 duplex units with a 2-car driveway for each unit. When funding is secure, LHA anticipates 6 months for infrastructure and 24 months for construction to be complete.

LONG-TERM GOALS

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 29 MTW activities since entering the program in 2011. The following chart summarizes 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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Closed Out FY2021	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	Ongoing	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
27	HCV Portability Restrictions	FY2021	Ongoing	1 & 2
28	HCV Alternate Certification Schedule	FY2022	Modified	2
29	Contract Amendments to Remove or Add Units at LHA-Owned Project Based Voucher Units	FY2021	Ongoing	3
30	Exclude Student Financial Aid from Income Calculation (HCV Participants)	FY2022	Proposed	2

***Highlighted activities are newly proposed or modified.**

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

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

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

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

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

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.	55	Complete	No	High rise apartments for 62 and over – voluntary conversion to PBV in FY2020
	261			

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
N/A

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 Operations \$401,768\$
KY004 PHA-Wide Management Improvements \$200,884
KY004 PHA-Wide Administration \$200,884
KY004 PHA-Wide Fees & Costs \$301,326
KY004000001 Storm door replacement; carbon monoxide detector installation \$99,727
KY004000002 Storm door replacement; carbon monoxide detector installation \$117,214
KY004000003 Door, window, storm door replacement; carbon monoxide detector installation \$475,311
KY004000007 Exterior stair & concrete repair/replacement \$60,000
KY004000028 Balcony & downspout repair/replacement \$386,825
Connie Griffith & Ballard Fire Alarm Upgrade \$400,000

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	30456	2538
Local, Non-Traditional: Tenant-Based [^]	5232	436
Local, Non-Traditional: Property-Based [^]	0	0
Local, Non-Traditional: Homeownership [^]	0	0
Planned Total Households Served	46440	3870

* “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 FY2022. Marketing efforts have increased including television ads to attract applicants. Security deposit and first month’s rent waived through the end of August 2021.
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	1726	Partially Open	Yes
Housing Choice Voucher	Community Wide	919	Closed	Yes
PBV	Centre Meadows	1422	Partially Open	Yes
PBV	Connie Griffith	16	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 28 – HCV Alternate Certification Schedule

A. Activity Description

i. Proposed Activity Description

This activity was approved in the FY2021 MTW Annual Plan and is ongoing. HCV participants are allowed an alternative recertification schedule of every three years rather than annual certification of income. Program participants are not required to report increases in income during the three years. LHA requests approval to modify this activity from the original submission as follows:

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. If the participant has employment income and the gross income is less than \$200 for the 12-month look back period that income will be excluded in the retro income calculation. If verification cannot be obtained from the employer or the client does not have client provided documentation to verify the gross income of less than \$200, LHA will accept a client self-certification as verification. Currently 425 participants have employment income and gross income less than \$200 in Retro Income.

The LHA’s triennial certification policy dictates issuance of a new voucher size (payment standard subsidy size) effective with interim certifications that report a change in family composition (either adding or removing a member that would result in a payment standard change). When a participant reports a family composition change that decreases their voucher size (payment standard) 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. LHA requests that should the decrease in the payment standard at interim certification result in an increase of tenant rent portion, LHA will give the household at a minimum of 60-day notice of the rent increase in tenant portion.

Other components this activity that remain in place with from the original approval of the FY2021 MTW Plan submission are as follows:

- 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.
- 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 for another 90 days, causing their retro income to decrease even more. 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.
- 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 upon triennial certification or change of unit. LHA proposes to use the simplified schedule.

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

This activity is ongoing for all MTW-eligible HCV households (excluding elderly, disabled households, LHA Special Partner programs, FSS participant and households that contain a mix of eligible and non-eligible household members). The new and modified activity components will be implemented upon approval of the FY2022 Plan.

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
\$620	\$570	TBD	

Average Monthly HAP Payment	Expected Monthly HAP Payment		
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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 Hour 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 \$221	Average Tenant Rent Contribution \$251	TBD	TBD

SS #1: Increase in Household Income			
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 \$19,000	Benchmark is equal to: Annual increase of 2% in the Average Earned Income of Work-Able households \$19,380	TBD Average Earned Income of Work-Able households	TBD 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 the activity.	Whether the outcome meets or exceeds the benchmark.
701 of 1,326	750 of 1,326	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
38 of 1,326 households	38 of 1,326 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

SS #8: Households Transitioned to Self-sufficiency			
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
701 of 1,326	767 of 1,326	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

B. 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. In addition to, reducing the number of annual certifications by allowing triennial certification.

The modifications to this activity may increase the rent burden to those households who have a change in household composition and there is a decrease in the payment standard at an interim certification resulting in an increase of tenant rent portion. LHA will monitor this component of the activity to be sure it does not disproportionately affect participants.

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

C. 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.

D. Rent Reform/Term Limit Information

i. 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.

ii. **Hardship Case Criteria**

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.

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 past 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.

- iii. **Description of Annual Reevaluation**
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
- iv. **Transition Period**
Program participants were transitioned to this activity upon initial approval and no transition is necessary based on the modifications requested.

Activity #30 –Exclude Student Financial Aid from Income Calculation (HCV Participants)

A. Proposed Activity

i. Description

Currently any financial aid assistance for Housing Choice Voucher Participants in excess of amounts received for tuition that an individual receives under the Higher Education Act of 1965 from private sources, or from an institution of higher education is considered income to that individual. Persons over the age of 23 with dependent children may exclude all financial assistance from income. LHA proposes to exclude financial aid assistance that exceeds tuition for all adult full-time students to align with the public housing program that excludes the full amount of financial aid assistance for students unless it is an athletic scholarship that includes assistance available for housing costs and that portion is included in income.

ii. Statutory Objectives Achieved

This activity will serve reduce the administrative burden for LHA staff and affected program participants.

iii. Implementation Schedule

Upon approval of the FY2022 MTW Annual Plan, LHA will implement this activity at the participant’s next regularly scheduled recertification for affected households.

B. Activity Metrics

Data will be compiled from identifying and track affected program participants.

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.
30 minutes Total amount of staff time verify student financial aid income prior to implementation of the activity (in hours).	0 minutes Expected amount of staff time to verify student financial aid income after implementation of the activity (in hours).	TBD Actual amount of total staff time dedicated to verify student financial aid income after implementation of the activity (in hours).	TBD

C. Cost Implications

- i. The proposed activity will initially result in possible negative cost implications when student aid assistance is excluded from income.
- ii. Long term implications from a participant continuing their education are anticipated to be positive with an increase in earned income and less HAP paid on behalf of the participant.

D. Need/Justification for MTW Flexibility

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.

E. Rent Reform/Term Limit Information

i. Impact Analysis

Impact Analysis of LHA HCV Program Participants		
	Impacted by Policy	All Participants
Affected Program Participants	7	*1,326
Gender		
Female	5	1,246
Male	2	80
Race		
Black	5	1,093
White	2	231
Asian	0	2
American Indian/Alaska Native	0	0
Ethnicity		
Hispanic	0	27
Non-Hispanic	7	1,299
Disability Status		
Disabled	0	663
Non-Disabled	7	1,326
Average Age	24	38

***Work-able households only.**

This initiative will be of benefit to adult program participants by excluding financial aid assistance from annual income thereby reducing their rent portion.

ii. Hardship Case Criteria

LHA staff sees no need for a hardship policy for this activity as affected households will see a reduction in their rent portion.

iii. Description of Annual Reevaluation

Staff will review this activity annually to determine if modifications are necessary.

iv. Transition Period

Program participants affected by this activity will be receive the benefit of this activity at their next regularly scheduled recertification appointment.

IV. APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

A. Implemented Activities

Activity 1: Increase Minimum 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

LHA has not planned any non-significant changes or modifications to this activity during the plan year.

iv. Planned Changes to Metrics/Data Collection

No changes are planned to the metrics/data collection during the Plan year.

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented Amended

Activity_Proposed FY2014 and modified in FY2020

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 New Vista (formerly Bluegrass.org), Community Action Council (CAC) and Arbor Youth Services. LHA plans to provide voucher assistance to Natalie's Sister, a nonprofit organization that partners with numerous churches and organizations to reach at-risk populations that are sexually exploited and trafficked. LHA will reallocate the voucher assistance to the three current partners that provide social services to support, to provide the eight vouchers to Natalie's Sister without increasing total voucher assistance beyond 32.

iii. Planned Non-Significant Changes

During the Plan year, LHA will offer voucher assistance to program participants of a new special partner social service provider, but total voucher assistance will not exceed the previously approved 32 vouchers.

iv. Planned Changes to Metrics/Data Collection

No changes are planned to the metrics/data collection during the Plan year.

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

The 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

LHA has not planned any non-significant changes or modifications to this activity during the plan year.

iv. Planned Changes to Metrics/Data Collection

No changes are planned to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this 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. 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. July 2020, LHA suspended the imputed income calculation for households who lost employment through August 31, 2021, due to COVID-19. The requirement to have 3 months uninterrupted employment for new admissions was also suspended July 2020 and continues to be suspended to address vacancy issues.

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/implemented FY2015

ii. 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. As no new admissions receive the EID calculation, the number households remaining that received the EID calculation prior to the activity's implementation are less each year due to attrition.

iii. Planned Non-Significant Changes

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

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

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

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

i. Plan Year Approved, Implemented, Amended

Activity proposed/approved/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. During FY2021, households were allowed more than one interim for COVID-19 related reasons. All cases are reviewed on a case-by-case basis.

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**

Activity proposed/approved/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.

HQS inspections continued during FY2021 during the COVID-19 crisis with added precaution and all inspectors were required to use personal protective equipment (PPE) that included face masks, gloves, and shoe covers. Participants were sent notification that social distancing would be necessary to conduct inspections and advised to contact the HCV office if someone in the household was experiencing COVID-19 symptoms or so that the inspection could be rescheduled.

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, 16 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 LHA-owned Connie Griffith Apartments was converted to PBV following voluntary conversion from public housing in FY2020. LHA may utilize the authorizations of this activity in developments planned for FY2022.

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 activity through a Plan amendment during 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. 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 29 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 activity through a 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. Currently, 23 participants are under lease. 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

Elderly households are exempt from this activity.

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 (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 improves administrative efficiencies, eliminates confusion for the voucher participant, and improves the response time for performing inspections. The LHA has experienced no issues with this activity 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 activity through a Plan amendment during the Plan year.

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

i. Plan Year Approved, Implemented

Approval Date: FY2019

ii. 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. Currently the 55 PBV occupied units at Connie Griffith Apartments are affected by this activity. This activity does not apply to RAD units, reasonable accommodation instances or Violence Against Women (VAWA) cases.

iii. Planned Non-Significant Changes

The LHA does not anticipate any non-significant changes or modifications to this activity 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 activity through a Plan amendment 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. HCV staff reports that this activity has made it possible for five participant households to lease the unit they choose by exercising this authority.

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. Plan Year Approved, Implemented

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.

Protections for CGA residents that continued to live in the building post voluntary conversion covers the following:

- 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);
- Thirteen (13) tenants will require a rent increase in the first phase increase in January 2022.

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.

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 # 27 – HCV Portability Restrictions

i. Plan Year Approved, Implemented

FY2021

ii. Description/Update

Through approval of this activity LHA limits portability for work-able HCV participants to encourage self-sufficiency and serve more families. Incoming and outgoing portability requests are considered on a case-by-case basis but generally are allowed for reasons related to employment, educational opportunities medica/health reasons or other extenuating family circumstances. During FY2021, staff says 76 port-in requests and 83 port-out requests were received in FY2021 26 port-in/out requests were denied.

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 activity through a Plan amendment in the Plan year.

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

i. Plan Year Approved, Implemented

FY2021

ii. Description/Update

Approval of this activity allows LHA to add previously removed contract units back to the HAP contract (due to an increase in a tenant's income), should the family have a decrease in income that causes HAP to resume at any point during the family's tenancy of a PBV unit.

This activity has afforded five (5) households affected by COVID-19 employment loss or reduction in hours an opportunity to receive relief due to the crisis.

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 activity through a Plan amendment in the Plan year.

B. Not Yet Implemented Activities

Activity #7: Public Housing Acquisition Without Prior Approval	
Approval Dates: FY2012-2013 Plan	
Description	<p>This relief this activity will provide applies only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.</p> <p>All acquired properties will meet HUD’s site selection requirements. Approval from the local HUD office will be sought when a pending real estate acquisition deviates from the selection requirements. Copies of all required forms and appraisals will be maintained at the Authority’s main office. After acquisition, all required documentation will also be provided to the HUD field office so HUD officials can ensure that site selection requirements were met and establish records for these new public housing properties in the agency’s data systems.</p>
Update	The LHA does not anticipate acquiring any public housing properties during FY2022 where it was necessary to implement this activity.
Timeline for Implementation	The LHA will develop a timeline for this activity during FY2022 should the Authority decide to acquire public housing units or land for the development of public housing.
Explanation of any non-significant changes 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	<p>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.</p> <p>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.</p>
Update	Should HUD issue a NOFA during FY 2022 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.
Timeline for Implementation	Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.
Explanation of any non-significant changes to the activity since it was approved.	The LHA does not anticipate any non-significant changes or modifications to this activity during FY2022.

Activity #9: Development of Project-Based Voucher Units at 800 Edmond St.	
Approval Dates: FY2012-2013 Plan	
Description	The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed on project-based voucher developments.
Update	The LHA plans to implement this activity once financial resources become available.
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.
Explanation of any non-significant changes 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	<p>When this activity was proposed the LHA did not have a confirmed funding source for sorely needed capital improvements at Ballard. After the activity was approved, the site’s tax credit investors informed the LHA that they would indeed have sufficient funds to complete the needed work. Having spent a significant portion of their reserves to fund these improvements the Housing Authority was concerned about their ability to cover any additional emergency capital repairs, which prompted creation of this activity.</p> <p>MTW funds would only be used if the LHA does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Towers no more than \$300,000 in emergency funds in total.</p>
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 renovation of 134 apartments in FY2020.
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
Explanation of any non-significant changes to the activity since it was approved.	The LHA does not anticipate any non-significant changes or modifications to this activity during FY2022.

C. Activities on Hold

N/A

D. Closed Out Activities

<p>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)</p>
<p>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.</p>
<p>Activity #3 - Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households Approved Implemented FY2012-2013 Plan, Modified FY2014 (Closed out FY2018)</p>
<p>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.</p>
<p>Activity #4 - HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy (Closed out FY2015)</p>
<p>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.</p>
<p>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)</p>
<p>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</p>

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.

Activity 16: HCV Rent Reform Study

Approved, Implemented, Amended – FY2015

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 concluded June 30, 2021 (FY2021). 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.

LHA received approval in FY2021 MTW Annual Plan (amended) to continue many of the policies from the Study in Activity 28 – HCV Alternate Certification Schedule.

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	\$6,725,827
70600	HUD PHA Operating Grants	\$30,426,655
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,906,565
71100+72000	Interest Income	\$95,391
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$367,014
70000	Total Revenue	\$39,821,452

i. 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	\$5,077,857
91300+91310+92000	Management Fee Expense	\$1,906,565
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$2,084,535
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,989,199
95000 (95100+95200+95300+95500)	Total Protective Services	\$370,986
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$593,552
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$379,936
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$24,899,508
97400	Depreciation Expense	\$1,792,939
97500+97600+97700+97800	All Other Expense	\$7,219
90000	Total Expenses	\$41,102,296

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

Variance is Depreciation Expense less budgeted surplus for year.

ii. 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

LHA will use single fund fungibility by transferring excess cash reserves from Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/21 per our audited report to be utilized for several projects. Those projects would include but not be limited to: development of land recently acquired at 1604 Versailles Road with plan of developing 59 +/- low income housing units; Property currently owned by LHA at Third and Race St with the development of 6 +/- market rate units; and the build out of the last parcel of land from our former Bluegrass Aspendale site by subdividing and selling 11 +/- lots for single family homes, 1 +/- lot for an early childhood prep academy with LHA developing 4 +/- units on the last portion. Ongoing items include the final needs for Ballard Apartments, a senior designated high-rise which was awarded 9% tax credits and a possible 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 MANGEMENT 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

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

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.

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

The renovated site is now known as Centre Meadows with rents subsidized by HCV (Housing Choice Voucher 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.

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

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 2022 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 FY2021 MTW Annual Plan was approved by HUD on December 30, 2020, as submitted on December 28, 2020, effective through June 30, 2021; and

WHEREAS, LHA has proposed one new activity and revised two ongoing activities in the FY 2022 MTW Annual Plan that will serve to do one or more of the following, increase housing choice for low-income families, encourage self-sufficiency or reduce cost; and

WHEREAS, a Board Resolution approving the proposed FY 2022 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 October 11, 2021, through November 11, 2021, for the public to comment on the Plan, and has conducted a Public Hearing on October 24, 2021, 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 2022 MTW Annual Plan, effective July 1, 2021, through June 30, 2022, is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.



Joan Whitman
Chairperson, Board of Commissioners

November 18, 2021
Date



Audit Trail

DigiSigner Document ID: 9097457b-3496-427c-a3c3-a67ad9942f80

Signer

Email: joanskyhomes@gmail.com
IP Address: 74.136.49.1

Signature

Joan Whitman

Event	User	Time	IP Address
Upload document	tincherd@lexha.org	11/18/21 10:11:10 AM EST	64.191.140.18
Open document	tincherd@lexha.org	11/18/21 10:11:21 AM EST	64.191.140.18
Close document	tincherd@lexha.org	11/18/21 10:11:41 AM EST	64.191.140.18
Send for signing	tincherd@lexha.org	11/18/21 10:11:45 AM EST	64.191.140.18
Open document	joanskyhomes@gmail.com	11/18/21 10:23:42 AM EST	74.136.49.1
Sign document	joanskyhomes@gmail.com	11/18/21 10:24:05 AM EST	74.136.49.1
Close document	joanskyhomes@gmail.com	11/18/21 10:24:05 AM EST	74.136.49.1
Download document	joanskyhomes@gmail.com	11/18/21 10:24:18 AM EST	74.136.49.1

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

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 7/01/2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or 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 PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by 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.

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

<u>Lexington-Fayette Urban County Housing Authority</u>	<u>KY004</u>
PHA Name	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)

<u>Austin J. Simms</u>	<u>Executive Director</u>
Name of Authorized Official	Title
	<u>1/21/2022</u>
Signature	Date

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

B. 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).

Newspaper ad advertising public hearing and 30-day public comment period ran in the Lexington Herald-Leader Sunday, October 10, 2021. The Plan was available for public review October 11 – November 11, 2021. Nine people attended the public hearing. No comments were received on the Plan. One hearing participant asked questions for clarification on public housing and Section 8 admissions requirements. There were no questions concerning new or modified Plan initiatives.

Public Hearing was held using Zoom video conferencing.

Legals

PUBLIC HEARING ANNOUNCEMENT

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) the proposed FY2022 Moving to Work (MTW) Annual Plan; 2) revisions to the Housing Choice Voucher (Section 8) Administrative Plan; 3) and revisions to the Public Housing Admissions and Continued Occupancy Policy.

The public hearing will be held on Tuesday, October 26, 2021, 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 FY2022 MTW Annual Plan that includes one new activity, modification to two activities related to the Housing Choice Voucher (HCV/ Section 8) program, updates to ongoing activities as well as proposed modifications to the HCV Administrative Plan and Admissions and Continued Occupancy Policy that governs the Public Housing program.

Specifically, new activities and modification to two activities to be discussed are:

New Activity – Activity #30 –Exclude Student Financial Aid from Income Calculation (HCV Participants)

Modifications to:

Activity 28 – HCV Alternate Certification Schedule and Activity 10: Housing Choice Voucher Tenant-Based Special Partner Programs

LHA welcomes public comment regarding these changes from October 11 – November 11, 2021. Complete copies of the affected documents 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 300 W. New Circle Road, Lexington, KY 40505 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.

IPL0044657
Oct 10 2021

**LHA Public Hearing
Tuesday, October 26, 2021
5:30 p.m.**

Attending:
Tonya Christopher
Sean Cooper
Michele Lee
Aldean Pleasant
Yomira Rodriguez
Austin Simms
Tom Smith
Joan Whitman
Andrea Wilson

Zoom Meeting Invitation

Andrea Wilson is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting
<https://us02web.zoom.us/j/86371890494>

Meeting ID: 863 7189 0494
One tap mobile
+13126266799,,86371890494# US (Chicago)
+16465588656,,86371890494# US (New York)

Dial by your location
+1 312 626 6799 US (Chicago)
+1 646 558 8656 US (New York)
+1 301 715 8592 US (Washington DC)
+1 346 248 7799 US (Houston)
+1 669 900 9128 US (San Jose)
+1 253 215 8782 US (Tacoma)
Meeting ID: 863 7189 0494
Find your local number: <https://us02web.zoom.us/j/86371890494>



C. PLANNED AND ONGOING EVALUATIONS

The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).

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.

D. LOBBYING DISCLOSURES

The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).

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

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

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

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

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

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

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

Name of Authorized Official

Austin J. Simms

Title

Executive Director

Signature



Date (mm/dd/yyyy)

11/18/2021

Previous edition is obsolete

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