

*The Housing Authority of the  
City of Lincoln, Nebraska*



**MOVING TO WORK  
ANNUAL REPORT**

*Fiscal Year 2021-2022*

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**<THIS PAGE IS RESERVED FOR INSERTION OF  
HUD'S LETTER OF ACCEPTANCE FOR THE MTW REPORT>**

## **LINCOLN HOUSING AUTHORITY**

**NE002**

5700 R Street

Lincoln, NE 68505

Phone: 402-434-5500

Fax: 402-434-5502

Email: [Info@L-housing.com](mailto:Info@L-housing.com)

Website: [www.L-housing.com](http://www.L-housing.com)

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Fatma Saoy

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Dan Brown, Human Resources Manager

Thomas Judds, Planning and Development Manager

Jim Loos, IT Manager

Susan Tatum, Tenant Services Manager

Jim Mahoney, Maintenance Manager

This Moving to Work (MTW) Annual Report is prepared in accordance with the “Amended and Restated Moving to Work Agreement” between the Department of Housing and Urban Development and Lincoln Housing Authority. This agreement was signed by both parties in April, 2008 and extended the MTW program until the end of the housing authority’s 2018 Fiscal Year. The agreement was subsequently extended to the end of the housing authority’s 2028 Fiscal Year. The required elements of the report are detailed in HUD Form 50900 (OMB Control Number: 2577-0216 Expiration Date: (03/31/2024)

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## **B. OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES**

The Lincoln Housing Authority is one of a small number of housing authorities across the country participating in the U.S. Department of Housing and Urban Development (HUD) Moving to Work demonstration program. Originally authorized under the Omnibus Consolidated Rescissions and Appropriations Act of 1996, the MTW program offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The statutory goals of the MTW demonstration are:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- 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
- Increase housing choices for low-income families.

Lincoln Housing Authority and HUD entered into a five-year MTW Agreement in May, 1999. This agreement was amended several times to extend the demonstration program. In 2008, a new Amended and Restated MTW Agreement was signed. This agreement extended the MTW demonstration at Lincoln Housing Authority until 2018. In April 2016, the agreement was extended to 2028.

From the beginning of the demonstration, we have approached MTW reforms with the idea that some persons may always need to receive a basic level of housing assistance - due to age, disability, low wages or other reasons - and that the varying needs of those persons would be best served by maintaining a simplified income-based rent structure. We also understand that for a great many people, housing assistance can and should be a temporary step to greater self-sufficiency. By encouraging work and individual responsibility, we have achieved a high percentage of working families and a strong voucher turnover rate without implementing arbitrary time limits or unaffordable rent structures. In conjunction with an open waiting list and a strong preference system, this has allowed us to continue to issue new vouchers to many of the neediest persons in Lincoln, Nebraska

Lincoln Housing Authority continues to be aware of the need to expand the supply of affordable housing in our community. However, we have not wanted to do so at the risk of decreasing the number of deep subsidy units available through the Housing Choice Voucher and Public Housing Programs. Since the inception of MTW, however, we have been able to leverage non-

HUD sources to add additional rental units, mostly through the Low Income Housing Tax Credit (LIHTC) Program. While these units do not receive deep subsidies, they have expanded the supply of affordable housing available to low and moderate income families and broadened the choice of available units to voucher holders. During this fiscal year, LHA prepared for the development of another 128-unit affordable complex in a growth area on the edge of the city. The work included site planning, design, annexation, and zoning. In April 2022, LHA submitted an application for 9% LIHTC credits for phase one of this development, and anticipate moving forward pending approval of the financing.

The city of Lincoln and the state of Nebraska have been fortunate to have maintained low unemployment rates for an extended number of years. This has been an important factor in the Moving to Work Demonstration. The Nebraska Department of Labor reports the statewide unemployment rate in March of 2022 was 2.0 % and in April 2022 lowered to 1.9%. This rate is down 0.7 percentage points from the April 2021 rate of 2.6 %. The national unemployment rate for April 2022 was 3.6%. The Lincoln Metropolitan Statistical Area (MSA) had an unemployment rate of 2.1% in March 2022 and lowered to 1.8% in April 2022. The current low unemployment rate is a positive sign for Lincoln and on-going success of the housing authority's MTW initiatives.

**COVID-19.** During the course of March 2020, the country underwent a monumental economic shutdown in response to the COVID-19 pandemic. In response, LHA discontinued Minimum Earned Income (MEI) during income reviews through June 30, 2021 (Rent Reform Initiative 2). We switched all households, not just elderly and disabled, to biennial reviews through June 30, 2021 to mitigate the impact of COVID-19 on our operations (Rent Reform Initiative 6). We also found it necessary to temporarily suspend most inspections of occupied units due to the pandemic but have since returned to normal operations. The changes in MEI, the reduction in frequency of income reviews, the suspension of inspections and the fluctuations in the employment market all significantly impacted the data reported for FY21. Not surprisingly, the percentage of households working and the overall level of tenant earned income declined while the cost of HAP increased significantly in FY21. For FY22, we saw a rebound in tenant income and the percentage of households working, but the HAP cost continued to increase in response to the rising cost of rent.

Since beginning the Moving To Work program, Lincoln Housing Authority has concentrated its efforts in the following long-term operational vision for the MTW program.

- Retain program flexibility to meet the many changes encountered in program funding, local housing market conditions, and the needs of the families and individuals participating in Lincoln's Moving To Work program.
- Continue to seek ways to simplify and streamline the Section 8 Housing

Choice Voucher program and Public Housing programs while protecting the integrity of the program and accepting accountability for administrative requirements. The Section 8 Housing Choice Voucher program has been needlessly complicated for participants, landlords, and implementing staff. The complexity of the system resulted in several areas where errors occurred with substantial frequency. Tenants have been confused about deductions allowed and disallowed and how their portion of rent is determined. Landlords have been frustrated by the amount of paperwork and complex rules and regulations that the landlord must follow to be paid. The complexity has limited landlord participation, which in turn limits housing choices for voucher holders.

- Continue to promote opportunities for tenant self-sufficiency either through education or meaningful work experience. The opportunity for lower-income participants to complete their education and expand their work experiences will provide a solid base for continued success in their personal and family development.
- Continue the various community partnerships required to enhance participant opportunities in expanding family support services such as social services, education, transportation, and health care programs.

## **PROGRESS REPORT ON GOALS AND OBJECTIVES**

The Lincoln Housing Authority has a number of goals and specific objectives that are integral to our success as a Moving To Work housing authority. Many of these goals have been integral to our MTW program since the beginning and will continue to be a focal point for the duration of our MTW agreement.

### GOAL I

Increase the number of Section 8 Housing Choice Voucher and Public Housing participants working or making progress towards educational goals, work experience, and self-sufficiency.

#### GOAL I OBJECTIVES:

- Provide incentives for work-able participants to work or seek self-sufficiency through job training or education. Also provide disincentives to work-able participants who choose not to work, seek job training, or further education.
- Form community and state partnerships to provide needed programs and services that encourage participation in recognized self-sufficiency programs.



PROGRESS REPORT: Since the beginning of the MTW initiative, LHA has had a Minimum Earned Income (MEI) requirement which serves as an incentive to work (Rent Reform Initiative Two). Two notable exemptions to this requirement are given for participants who are involved in education or approved self-sufficiency programs. We have MOUs with state government and local non-profits to provide self-sufficiency programs for purposes of this exemption. In FY2021, we added a blanket exemption due to COVID-19 through June 30, 2021. LHA rewards working families by not immediately increasing rent when participants go to work or advance in their work. Rather, that increase in rent is delayed until the household's next annual review. A positive indicator of the success of this objective is the employment rate in work-able households: 88% in public housing and 76% in housing choice vouchers. These rates rebounded from the FY21 data but remain slightly below Pre-COVID-19 rates in the FY2020 report. A long-term trend that impacts this goal is that the overall share of elderly and disabled households is increasing, while the share of work-able households in the program is decreasing.

## GOAL II

Reduce administrative costs and achieve greater cost effectiveness in federal housing assistance expenditures while ensuring the continued integrity of the program.

### GOAL II OBJECTIVES:

- Simplify the operation of the Section 8 Housing Choice Voucher program and the Public Housing program with the purpose of reducing calculation errors, staff review time, and program administrative costs. Simplification also reduces the burden on tenants by requiring fewer meetings and fewer documents.
- Work with landlords, housing participants, and human service organizations to identify areas of needed change in the operation of the Section 8 Housing Choice Voucher program and the Public Housing program.

PROGRESS REPORT: LHA has implemented several initiatives to simplify our programs to improve tenant satisfaction, reduce errors, and make more effective use of staff time. These initiatives have been effective and have allowed us to increase the number of vouchers, work with special programs such as VASH and Mainstream, and participate in the low-income tax credit program while maintaining the total number of staff in the agency. Through our agency planning process, resident and landlord advisory boards, resident councils, participation in the Lincoln Human Services Federation (Cause Collective), the Continuum of Care and numerous other community groups, we are able to interact with key stakeholders and obtain both formal and informal feedback on housing authority operations. This includes the addition of an initiative for landlord incentives which has helped attract and retain landlord participation. The number of landlords participating in the voucher program increased initially from 747 in October

2014 but now has declined to 689 in March 2022. Lincoln, like much of the country, has sustained a very tight rental market for multiple years, which makes voucher tenants less competitive. For this reason, we increased the incentive from \$150 to \$200 in 2020. We also continue to see some consolidation of ownership and management of rental properties which can affect this metric.

During FY2022, we received an award for 100 new Emergency Housing Vouchers. Working with the Continuum of Care, we received HUD approval to apply MTW rules to these new vouchers, with the exception of Rent Reform Initiative 2 (Minimum Earned Income) and Other Initiative 2 (Responsible Portability). We built upon our MTW experience to design leasing incentives into EHV, including a more robust landlord incentive of \$500.

In addition to our MTW initiatives, Lincoln Housing Authority began the process to convert public housing units from the public housing model to a project-based voucher model to stabilize the funding while continuing to offer high quality assisted housing. Due to the good condition of LHA's public housing units, the plan is for a simple conversion of subsidy with minimal additional financing or rehabilitation. LHA intends to continue to own and operate the units as income-based rental housing, either directly or through a controlled affiliate. As of October 1, 2019, LHA completed the transition of Mahoney Manor to project-based vouchers through the Rental Assistance Demonstration (RAD) program. We are also preparing an application under the Section 18 disposition requirements for scattered site public housing, although progress slowed this past two years due to the COVID-19 pandemic. LHA intends to project-base Tenant Protection Vouchers in the scattered site units. We are concerned that the RAD funding formula will result in contract rents that are significantly below market at conversion, and the RAD rules could result in rent increases for some tenants who currently pay higher ceiling rents. We intend to use MTW flexibility to enact a fair and reasonable rent policy for the RAD converted units and/or Section 18 disposition units. RAD conversion and/or Section 18 disposition will result in elimination of the Public Housing Capital Fund and Public Housing Operating Fund. LHA will operate the converted properties and establish capital improvement reserves from the rental income stream, which is how LHA operates all its other rental properties. The current Capital Fund 5-year plan will be used as a basis for future capital improvement planning.

### GOAL III

Expand the spatial dispersal of assisted rental units and increase housing choices for voucher holders.

#### GOAL III OBJECTIVES:

- Provide incentives to seek housing opportunities outside areas of low-income concentration.

- Create affordable housing opportunities in growth areas of the community.

PROGRESS REPORT: Our housing choice voucher data shows we have been able to increase the spatial dispersal of rental units including housing opportunities outside areas of low-income concentration. Through participation in the Low-Income Housing Tax Credit (LIHTC) program and bond-financing, LHA has developed 342 units over the past 20 years in middle- and upper-income growth neighborhoods and acquired 86 additional units of low-income housing. In August 2019, LHA completed the purchase of 13.6 acres of land for a new development and is in the process of developing 128 additional units in a LIHTC development on this site. The land is located in a newly developing, high opportunity area. We have applied for Low Income Housing Tax Credits in the 2022 funding cycle and are awaiting news of awards. It is clear that the location of LIHTC properties outside areas of poverty concentration is critical to increasing housing opportunities and choices for voucher holders as these properties are required to accept vouchers unlike other private market developments. Through participation in special voucher programs, such as VASH, Mainstream, and EHV we have also increased our authorized vouchers during our participation in MTW, including the additional 127 Mainstream Vouchers in 2020 and 2021, and 100 new EHV in FY22. LHA continues to seek land for further development of affordable housing, but limited availability and high land prices are a major barrier to development. LHA also participated in the development of the first City of Lincoln Affordable Housing Coordinated Action Plan and the establishment of a CDFI entity dedicated to affordable housing. These initiatives represent a new citywide effort to develop more affordable housing.

## C. MTW INITIATIVES

For fiscal year 2021-2022, the housing authority continued to implement the following MTW initiatives. These are described and reported on in Section IV. Approved MTW Activities:

### Rent Reform Initiatives

- Interim Reexaminations
- Minimum Earned Income
- Rent Calculations at 27% with no deductions
- Rent Choice Capped at 50% (voucher only)
- Average Utility Allowances (voucher only)
- Biennial Re-Examinations for elderly and disabled households

### Other Initiatives

- Income Eligibility
- Responsible Portability (voucher only)
- Housing choice voucher inspection waiver for properties where the annual or initial inspections are without deficiencies.
- Inspections and rent reasonableness regardless of ownership or management status
- Project-based Section 8 Units
- RentWise Tenant Education
- Resident Services Program at Crossroads House
- Landlord Incentive HAP (voucher only)

## II. General Operating Information

### A. HOUSING STOCK INFORMATION

#### i. ACTUAL NEW PROJECT-BASED VOUCHERS

Property Name	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
To be selected	20	0	NA	NA	LHA has an ongoing plan to accept applications to project-base 20 vouchers to serve persons with disabilities. The project will be selected through another competitive process and will have a separate, site-based waiting list.
Public Housing	200	0	Planning	No	Section 18 Disposition of AMP 2 and AMP 3, 200 units of scattered site family Public Housing
	220	0			

\* Planned column matches Annual MTW Plan

#### Differences between the Planned and Actual Number of Vouchers Newly Project-Based:

As noted above, LHA has an ongoing plan to accept applications to project-base 20 vouchers to serve persons with disabilities. No applications were received in the past fiscal year. One previous application was not approved because the site did not meet environmental requirements. Mahoney Manor was completed through a RAD transaction. The conversion of the scattered sites public housing units remains in the planning stage.

**ii. ACTUAL EXISTING PROJECT-BASED VOUCHERS**

Property Name	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
	Planned	Actual			
Victory Park	70	70	Leased	No	This project consists of 45 project-based VASH vouchers and 25 tenant-based VASH vouchers. These are all designated for Victory Apartments on the VA campus in Lincoln. Reporting on non-MTW vouchers is no longer required but is included here because LHA has been approved to implement select MTW initiatives with VASH vouchers.
Mahoney Manor	120	120	Leased	Yes	RAD Conversion Date October 1, 2019
Crossroads House	58	58	Leased	No	Fiscal Year 14-15 was the final transition year to project-based vouchers at Crossroads House which has 58 units in total. Currently, all eligible residents are under PBV assistance.
	248	248			

**Differences between the Planned and Actual Existing Number of Vouchers Project-Based:**

Not Applicable

**iii. ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR**

There were no other changes to our MTW housing stock.

iv. **GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR**

*General Description of Actual Capital Fund Expenditures During the Plan Year (April 1, 2021 thru March 31, 2022)*

Capital Fund Program Grant	AMP	Property Name(s)	Nature of Work	Amount	Miscellaneous Information as of March 31, 2022
NE26P002501-21	2	N/A	Environmental Review	\$ 454.49	Environmental Review by Urban Development
\$538,181				\$ 454.49	
	3	N/A	Environmental Review	\$ 302.99	
	3	F-39 (Scattered Sites)	HVAC	\$ 57,780.00	
				\$ 58,082.99	
				\$ 58,537.48	Grant 26.7% obligated & 10.9% expended

Capital Fund Program Grant	AMP	Property Name(s)	Nature of Work	Amount	Miscellaneous Information as of March 31, 2022
NE26P002501-20	2	Hall (Scattered Sites)	Decks	\$ 97,316.00	
\$520,330	2	Hall (Scattered Sites)	Furances	\$ 42,010.00	
	2	Hall (Scattered Sites)	Concrete	\$ 2,193.00	
	2	Hansen (Scattered Sites)	Concrete	\$ 5,488.00	
	2	Larson (Scattered Sites)	Furances	\$ 18,918.80	
	2	Pedersen (Scattered Sites)	Furances	\$ 39,425.00	
	2	Pedersen (Scattered Sites)	Screen Doors	\$ 8,675.20	
	2	Pedersen (Scattered Sites)	Bathroom Windows	\$ 22,958.75	
	2	Pedersen (Scattered Sites)	Electrical Panels	\$ 13,732.68	
	2	Pedersen (Scattered Sites)	Concrete	\$ 1,530.00	
				\$ 252,247.43	
	3	A-12 (Scattered Sites)	Decks	\$ 10,966.00	
	3	A-12 (Scattered Sites)	Concrete	\$ 3,223.00	
	3	F-39 (Scattered Sites)	Sewer Cleanouts	\$ 17,510.00	
	3	F-39 (Scattered Sites)	Bathroom Exhaust Fans	\$ 8,529.00	
	3	F-39 (Scattered Sites)	Concrete	\$ 6,126.00	
	3	F-39 (Scattered Sites)	Foundations	\$ 89,355.00	
				\$ 135,709.00	
	HA	Administration		\$ 51,650.00	
	HA	Fees & Costs		\$ 1,992.44	
				\$ 53,642.44	
				\$ 441,598.87	Grant 98.9% obligated & 84.9% expended

Capital Fund Program Grant	AMP	Property Name(s)	Nature of Work	Amount	Miscellaneous Information as of March 31, 2022
NE26P002501-19	2			\$ -	Obligation end date is April 15, 2023
\$734,582				\$ -	LHA to start closing process with HUD
	3			\$ -	
				\$ -	
				\$ -	
				\$ -	Grant 100% obligated & 100% expended

Capital Fund Program Grant	AMP	Property Name(s)	Nature of Work	Amount	Miscellaneous Information as of March 31, 2022
NE26P002501-18	2			\$ -	June 24, 2021 - LHA received notice grant closed
\$701,884				\$ -	
	3			\$ -	
				\$ -	
				\$ -	
				\$ -	Grant 100% obligated & 100% expended

## B. LEASING INFORMATION

### i. ACTUAL NUMBER OF HOUSEHOLDS SERVED

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned	Actual	Planned	Actual
MTW Public Housing Units Leased	2,352	2,354	196	196
MTW Housing Choice Vouchers Utilized	35,280	35,283	2,940	2,940
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	0	0	0	0
<b>Local, Non-Traditional: Home Ownership</b>	0	0	0	0
<b>Planned/Actual Totals</b>	37,632	37,637	3,136	3,136

Instructions from HUD:

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

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

\*\*MTW report of MTW Households Served includes all households that received housing assistance, directly or indirectly, using any amount of MTW funds, including VASH and Mainstream Vouchers.

#### **Differences between the Planned and Actual Households Served:**

There was no difference between the planned and actual household served.



LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED*	
		Planned	Actual	Planned	Actual
Tenant-Based	NA	0	0	0	0
Property-Based	NA	0	0	0	0
Homeownership	NA	0	0	0	0
<b>Planned/Actual Totals</b>		0	0	0	0

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

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
RentWise Tenant Education	33	399
Crossroads House Resident Services	30	74
<b>TOTAL</b>	63	473

ii. **DISCUSSION OF ANY ACTUAL ISSUES/SOLUTIONS RELATED TO LEASING**

<b>HOUSING PROGRAM</b>	<b>DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS</b>
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**MTW Public Housing**

Lincoln Housing Authority has 200 public housing units. Thirty-five units vacated and 33 units were re-leased during the fiscal year; this reflects normal unit turnover. Other than typical unit turnover, all units were continuously occupied with no sustained vacancy issues.

The public housing units now consist entirely of single-family and duplex, scattered site homes. They are in good condition and blend-in well with the neighborhoods in which they are located. We anticipate that they will continue to be desirable rental units for families. We continue to see increased demands for higher levels of amenities. There are occasional difficulties re-leasing some units based on location, amenities, and/or applicant preferences, but we have no sustained vacancy issues.

We plan to convert the remaining public housing units to project-based vouchers. The income eligibility limit, which was approved through the FY 2021-2022 MTW Annual Plan, has been lowered to 50% of median income in anticipation of the conversion to Section 8. This will reduce the number of people who are eligible for the units; however, we currently have a sufficient number of applicants on the waiting list and do not anticipate this to be a significant leasing issue.

**MTW Housing Choice Voucher**

Throughout FY21-22, the Lincoln rental market for affordable housing remained tight with unit vacancy rates being extremely low. In response, LHA continues to work on increasing lease-up rates. In conjunction with the release of the FY22 Fair Market Rents, LHA increased payment

standards between 4-11% effective November 1, 2021. LHA's Landlord Incentive initiative continues to attract new landlords to the program – see Initiative 9. The Landlord Incentive continued at \$200. The agency's RentWise tenant education initiative is also designed to help with this issue by educating renters to be better tenants and to be better able to search for housing and market themselves as renters – see Initiative 7.

For CY22 the cumulative voucher utilization rate was 87% while the HAP expenditures were 91% of budget authority. In FY22 the average HAP costs increased 4.5%. The impact of COVID-19 continued to be seen in the interims completed due to lost income and the suspension of the MTW Minimum Earned Income initiative continued for the first three months of FY22. The pre-COVID average HAP cost in February 2020 was \$398. In February 2022, this cost was \$453 or a 13.8% increase in average HAP costs after the local economy was impacted by COVID.

Rental application fees and the lack of tenant funds for security deposits continue to be a common leasing barrier for voucher holders. LHA manages a homeless deposit assistance program funded by the City of Lincoln HOME funds. Expenditures for FY22 were up 27% over FY21 although still 46% lower than the FY20, the year prior to COVID-19. With \$16,200 in expenditures this program only assisted 16% of last year's new admissions with a homeless preference indicating that increased CARES Act funding for homeless households helped fill the need for this population.

### **Local, Non-Traditional**

Not Applicable

## C. WAITING LIST INFORMATION

### i. ACTUAL WAITING LIST INFORMATION

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR?
Housing Choice Voucher	Community Wide	3,009	Open	Yes*
Public Housing – Family	Community Wide-- Family Housing	379	Open	Yes*
Mahoney Manor – Project Based Voucher	Site-Based Elderly and Near Elderly	139	Open	Yes*
Crossroads House—Project-Based Vouchers	Site-Based—Age 55+	37	Open	Yes*

\*Waiting lists were continuously open throughout the year.

#### Description of Duplication of Applicants Across Waiting Lists:

LHA maintained open waiting lists throughout the year. Applicants are encouraged to apply for all housing programs which will meet their needs and desires. In addition to the above, LHA also has waiting lists for non-MTW housing programs and applicants also apply for these housing programs as appropriate. These non-MTW housing programs include affordable and tax credit housing where vouchers can be used.

**ii. ACTUAL CHANGES TO THE WAITING LIST IN THE PLAN YEAR**

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

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
<b>Housing Choice Voucher</b>	No changes
<b>Family Public Housing</b>	No changes
<b>Mahoney Manor – Project Based Vouchers</b>	No changes
<b>Crossroads House—Project-Based Vouchers</b>	No changes

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

**i. 75% OF FAMILIES ASSISTED ARE VERY LOW INCOME**

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems.

The following table is data for the actual families housed upon admission during the Plan Year reported in the “Local, Non-Traditional: Tenant-Based,” “Local, Non-Traditional: Property-Based,” and Local, Non-Traditional: Homeownership” categories. Lincoln Housing Authority had no MTW initiatives in these 3 categories. The data does not include households reported in the “Local, Non-Traditional Services Only” category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80% -50% Area Median Income	0
49% -30% Area Median Income	0
Below 30% Area Median Income	0
<b>TOTAL LOCAL, NON-TRADITIONAL HOUSHOLDS ADMITTED</b>	<b>0</b>

**ii. MAINTAIN COMPARABLE MIX**

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

<b>BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)</b>					
<b>FAMILY SIZE</b>	<b>OCCUPIED PUBLIC HOUSING UNITS</b>	<b>UTILIZED HCVS</b>	<b>NON-MTW ADJUSTMENTS*</b>	<b>BASELINE MIX NUMBER</b>	<b>BASELINE MIX PERCENTAGE</b>
<b>1 Person</b>	<b>122</b>	<b>954</b>	<b>164</b>	<b>1,240</b>	<b>40.1%</b>
<b>2 Person</b>	<b>32</b>	<b>651</b>	<b>-162</b>	<b>521</b>	<b>16.9%</b>
<b>3 Person</b>	<b>64</b>	<b>469</b>	<b>-178</b>	<b>355</b>	<b>11.5%</b>
<b>4 Person</b>	<b>51</b>	<b>286</b>	<b>28</b>	<b>365</b>	<b>11.8%</b>
<b>5 Person</b>	<b>26</b>	<b>130</b>	<b>152</b>	<b>308</b>	<b>10.0%</b>
<b>6+ Person</b>	<b>25</b>	<b>104</b>	<b>172</b>	<b>301</b>	<b>9.7%</b>
<b>TOTAL</b>	<b>320</b>	<b>2,604</b>	<b>176</b>	<b>3,090</b>	<b>100.0%</b>

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

**Justification for any “Non-MTW” Adjustments:**

The Non-MTW adjustments shown in the above table were submitted May 22, 2017 in our Annual MTW Report. The report was accepted by HUD February 1, 2018.

The original Occupied Public Housing Units and Utilized HCVS (baseline numbers shown in columns 2 and 3 above) were calculated from a June 1999 MTCS report (precursor to PIC). We are uncertain of the accuracy of the MTCS numbers at that time, but it is the only data we have from that time period. LHA has not implemented any MTW activities that would affect the distribution of household sizes other than the combination of the Voucher and Certificate program into one Voucher program at the beginning of the demonstration. All non-MTW agencies have since done this also. The change from Certificates to Vouchers affects the mix of families served from the waiting list, since the Certificate program had a set number of Certificates by bedroom size, and selection from the waiting list was determined by the bedroom size of the Certificate available. The switch to an all Voucher program results in the next family on the waiting list getting assistance regardless of family size or bedroom size. Over time the

mix of families served in the Voucher program simply reflects the distribution of families who apply. The trend since converting to an all-Voucher program is that we have served an increasing number of larger families and one person households. This would be a reflection of the demographics of our waiting list and not based on anything LHA has done through MTW.

<b>MIX OF FAMILY SIZES SERVED (in Plan Year)</b>				
<b>FAMILY SIZE</b>	<b>BASELINE MIX PERCENTAGE**</b>	<b>NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR ^</b>	<b>PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR ^^</b>	<b>PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR</b>
<b>1 Person</b>	<b>40.1%</b>	<b>1489</b>	<b>47.80%</b>	<b>7.80%</b>
<b>2 Person</b>	<b>16.9%</b>	<b>495</b>	<b>15.89%</b>	<b>-1.01%</b>
<b>3 Person</b>	<b>11.5%</b>	<b>309</b>	<b>9.92%</b>	<b>-1.58%</b>
<b>4 Person</b>	<b>11.8%</b>	<b>297</b>	<b>9.53%</b>	<b>-2.27%</b>
<b>5 Person</b>	<b>10.0%</b>	<b>261</b>	<b>8.38%</b>	<b>-1.62%</b>
<b>6+ Person</b>	<b>9.7%</b>	<b>264</b>	<b>8.48%</b>	<b>-1.22%</b>
<b>TOTAL</b>	<b>100.0%</b>	<b>3115</b>	<b>100.00%</b>	<b>0.00%</b>

\*\* The “Baseline Mix Percentage” figures given in the “Mix of Family Sizes Served (in Plan Year)” table matches those in the column of the same name in the “Baseline Mix of Family Sizes Served (upon entry to MTW)” table. The Baseline Mix Percentage was adjusted (see previous table) and accepted by HUD in a previous year.

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

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

**Justification for any Variances of more than 5% between the Plan Year and Baseline Year:**

LHA has not implemented any MTW activities that would affect the distribution of household sizes other than the combination of the Voucher and Certificate program into one Voucher program at the beginning of the demonstration. All non-MTW agencies have since done this also. The change from Certificates to Vouchers affects the mix of families offered from the waiting list, since the Certificate program had a set number of Certificates by bedroom size, and selection from the waiting list was determined by the bedroom size of the Certificate available. The switch to an all-Voucher program results in the next family on the waiting list getting assistance regardless of family size or bedroom size. Over time the mix of families served in the



Voucher program reflects the distribution of families who apply, reach the top of the list and continue on the program. The trend since converting to an all-Voucher program is that we have served an increasing number of larger families and one-person households. This would be a reflection of the demographics of our waiting list and not based on anything LHA has done through MTW. The one-person households on the waiting list that include elderly and disabled individuals have continued to increase relative to other household sizes. Census data shows a on-going increase in the number of older adults in Lincoln indicating that an aging population is helping to fuel this change. To the extent LHA has received additional voucher funding in recent years; it has been VASH, Mainstream Vouchers, RAD (Mahoney Manor) and EHV. These vouchers are more likely to serve one-person households, which may contribute to the increase. Since we apply MTW principles to these programs, they are included in the household counts.

**iii. NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY IN THE PLAN YEAR**

<b>MTW ACTIVITY NAME/NUMBER</b>	<b>NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY*</b>	<b>MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY</b>
Rent Reform #1, #2, #3	277	Households who voluntarily ended participation in rental assistance
HUD FSS Program (not MTW Activity)	19	Regular FSS Program and Completion Criteria
<b>SUB TOTAL</b>	296	
<b>LESS: Households Duplicated Across MTW Activities</b>	(11)	
<b>TOTAL Households Transitioned to Self-Sufficiency</b>	285	

### **III. Proposed MTW Activities**

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

## IV. Approved MTW Activities

<b>A. IMPLEMENTED ACTIVITIES</b>		
<b>Rent Reform Initiatives</b>		
<b>Number</b>	<b>Description</b>	<b>Statutory Objective</b>
Rent Reform 1	Interim Re-examinations	-Cost Effectiveness -Self-Sufficiency
Rent Reform 2	Minimum Earned Income	-Self-Sufficiency
Rent Reform 3	Rent Calculations	-Cost Effectiveness
Rent Reform 4	Rent Burden (Rent Choice)	-Housing Choice
Rent Reform 5	Average Utility Allowances	-Cost Effectiveness
Rent Reform 6	Biennial Re-Examinations	-Cost Effectiveness
<b>Other Initiatives</b>		
Initiative 1	Income Eligibility	-Cost Effectiveness
Initiative 2	Responsible Portability	-Cost Effectiveness
Initiative 3	Initiative 3 moved to Rent Reform 6 at HUD's request	
Initiative 4	HQS Inspections Waiver	-Cost Effectiveness
Initiative 5	Inspections & Rent Reasonableness Determinations	-Cost Effectiveness
Initiative 6	Project-Based Voucher Units	-Housing Choice -Cost Effectiveness
Initiative 7	RentWise Tenant Education	-Housing Choice -Cost Effectiveness
Initiative 8	Resident Services Program	-Housing Choice
Initiative 9	Landlord Incentive HAP	-Housing Choice

On the following pages, the following abbreviations are used: CE = Cost Effectiveness; HC = Housing Choice; and SS = Self-Sufficiency. In May, 2013, a revised HUD Form 50900 was approved for use by the Office of Management and Budget (OMB). HUD Form 50900 provides details on the required elements of the Annual MTW and Annual MTW Report. The HUD Form 50900 was updated January 2018. This form requires the use of standard metrics, as applicable, in order to allow HUD to analyze and aggregate data across all PHA's with similar activities. On the following pages, we have identified the standard metric(s) applicable to each initiative.

## **Rent Reform 1**

### **ACTIVITY: INTERIM RE-EXAMINATIONS**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Programs Affected: HCV & PH Programs

Plan Year Proposed: April 1, 1999

Plan Year Approved: FY 2000

Plan Year Implemented: July 1, 1999

Statutory Objectives: Reduce cost and achieve greater cost effectiveness in federal expenditures  
Give incentives to obtain employment and become economically self-sufficient

#### **ii. DESCRIPTION/IMPACT/UPDATE**

This initiative reduces the requirement for interim re-examinations.

Income increase: If the family's income increases without a change in family composition, then LHA will wait until the annual re-examination to re-determine any possible rent increase. Families who report zero income will be required to report income changes at their quarterly certification and rents will be changed accordingly.

Income decrease: LHA will not lower rent for payments due to a temporary loss of income of one month (30 days) or less duration. If a family member has reduced or terminated employment income, LHA will make the rent decrease 90 days after the decrease in income occurred or after all verifications are received to re-determine eligibility, whichever is the latest. Families who terminate their employment for good cause will be eligible for an immediate interim review and rent decrease, if applicable. Good cause will include lay-off, reduction-in-force, accident, injury, or illness which precludes work. In consideration of hardship, families will be exempt from this 90 day re-employment period if they meet one of the exemptions for the Minimum Earned Income (MEI) requirement shown later in this plan (Rent Reform #2).

It should be noted that the policy on income increases does not require an MTW waiver. The section on income decreases, specifically the 90 day period for a rent adjustment requires MTW flexibility. This interim policy affects households who have reduced or terminated employment. It delays rent decreases for 90 days after the decrease in income occurred or after all verifications

are received to encourage people to find immediate re-employment. HUD regulation at 24 CFR 982.516(b)(2) and (3) states “The PHA must make the interim determination within a reasonable time after the family request. Interim examinations must be conducted in accordance with policies in the PHA administrative plan”. However, the Housing Choice Voucher guidebook on page 12-10 defines “reasonable time” as the first day of the month following the date of the reported change.

We chose to list the above policies together. When LHA initially began the MTW program, the policy on income increases was part of our MTW plan as a way to encourage and reward households for increasing income such as through new employment. As family income increases, the family is not subject to an immediate re-examination of income and assets and the corresponding rent increase. The Quality Housing and Work Responsibility Act (QHWRA) of 1998 incorporated this part of Lincoln Housing Authority’s MTW initiative on interim reexaminations.

IMPACT AND OUTCOME
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LHA proposed and implemented this policy at the onset of its MTW program as an employment incentive to families. As families increased their income, they were not subject to an immediate re-examination of income and assets and the corresponding rent increase. The Quality Housing and Work Responsibility Act (QHWRA) of 1998 adopted this same initiative. Since the policies regarding income increases are not part of our MTW waivers, we are not collecting any data on this part of the activity.

The housing authority has continued to implement the policies on rent reduction due to decreased income. These policies encourage families to retain employment as well as to make it a priority to seek new employment when job losses occur. We believe this initiative has encouraged families to seek new employment without contacting the housing authority for a rent adjustment or to report job losses.

A local benchmark (see Additional Local Metrics below) for this initiative was to achieve 50% of the reported job changes achieving no rent decrease. This would represent an effective policy in that it will show people retaining their employment or being incentivized to seek new employment because a rent decrease was not forthcoming. We use a point in time system for data collection. This year’s data shows 62% of the households with job changes or job losses had no rent decrease related to the job change or loss. The 62% of households with no rent decrease after a job change or loss is indicative of the success of the MTW employment requirements incentivizing families who become unemployed to seek and obtain new employment. The 90-day delay work requirement was paused until July of 2021 due to the COVID-19 pandemic, which may have resulted in more households having a rent decrease during the first 3 months of the fiscal year. Lincoln’s very low unemployment rate at 2.1% (March 2022) also provides many opportunities for new employment.

Hardship data is also shown in Additional Local Metrics.

HUD STANDARD METRICS
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For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #1 Interim Re-examinations</b>				
This initiative reduces the number of required interim re-examinations for decreases in earned income. The baseline agency cost is calculated from the number of interim re-examinations (see CE #2) that were required for decreases in household income prior to the initiative. Through this initiative, the interim reviews are no longer required.				
Unit of Measurement	Baseline (November 2013)	Benchmark	Outcome	Benchmark Achieved
Total cost of Interim re-examinations under this initiative (decrease).	Staff labor = 90 hours (See CE#2) X \$27.14 per hour = <b>\$2,443</b>	\$0	Staff labor = 0 hours (See CE#2) X \$27.14 per hour = \$0	Yes

<b>CE #2 Staff Time Savings</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #1 Interim Re-examinations</b>				
This initiative reduces the number of required interim re-examinations for decreases in earned income. The baseline is a measure of the number of additional interim re-examinations that were performed without this Rent Reform #1 Initiative on Interim Re-examinations. This baseline level was 120 interim re-examinations per year at .75 hours per interim re-examination.				
Unit of Measurement	Baseline (November 2013)	Benchmark	Outcome	Benchmark Achieved
Number of interim re-examinations under this initiative	120 interim re-examinations .75 hours per interim re-examination = <b>90 hours</b>	0 hours	0 additional interim re-examinations @ .75 hour per interim re-examinations = 0 hours	Yes

### CE #5 Increase in Agency Rental Revenue

HUD Instructions for this metric are shown in the following two rows.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars)	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark

#### Rent Reform #1 Interim Re-examinations

This change to the interim re-examination policy was not intended and will not have significant effect on rental revenue. However, we expect total revenue to go up moderately over time due to inflation

Unit of Measurement	Baseline (FY 2008)	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	HCV: \$7,331,316  PH: \$997,006  TOTAL REVENUE: \$8,328,322	HCV: \$9,122,960  PH: \$855,066  TOTAL REVENUE: \$9,978,026	HCV: \$9,840,659  PH: \$864,272  TOTAL REVENUE: \$10,704,931	Yes

### SS #1 Increase in Household Income

HUD Instructions for this metric are shown in the following two rows.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Average earned income of households affected by this policy in dollars (increase)	Average earned income of households affected by this policy prior to implementation of the activity in (dollars)	Expected averaged 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 after implementation (in dollars)	Whether the outcome meets or exceeds the benchmark

#### Rent Reform #1 Interim Re-examinations

The data for this initiative is the average earned income of households that have earned income. Households without earned income are not affected by this policy on interim re-examinations.

Unit of Measurement	Baseline (April 2014)	Benchmark	Outcome	Benchmark Achieved
Average earned income of households with earned income.	PH \$22,643 HCV \$14,127	PH: \$22,000 HCV: \$14,000	PH \$30,634 HCV \$19,587	Yes

### SS #3 Increase in Positive Outcomes in Employment Status

HUD Instructions for this metric are shown in the following three rows.

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in a Job Training Program (5) Unemployed (6) Other	Head(s) of household in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number)	Actual head(s) of households in <<category name>>after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
	Percentage of total work-able households in <<category name>>prior to implementation of activity (percent). This number may be zero	Expected percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

#### Rent Reform #1 Interim Re-examinations

For this metric, we are measuring two of the units from the standard units of measurement. Note that (6) Other is used with two definitions. The first "Other" Category is Work-Able Households employed full or part-time. This is a combination of (1) Employed Full-time and (2) Employed Part-time from the HUD instructions above. This was a necessary modification by LHA. Category (6) Other was also used to specifically show the outcome that this specific initiative has on the households affected by Rent Reform #1.

Unit of Measurement	Baseline April 2010	Benchmark	Outcome	Benchmark Achieved
(3) Number of work-able households enrolled in an Educational Program as measured by reported educational benefit income	PH 29 out of 168 HCV 137 out of 1473 Total 166 out of 1641	166 out of 1641	PH 1 out of 143 HCV 16 out of 1,011 Total 17 out of 1,154	-
(3) Percent of work-able households enrolled in education program as measured by reported educational benefit income	PH 17% HCV 9% Total 10%	10%	PH 1% HCV 2% Total 1%	No---the percentage of households in education decreased from baseline, however, the percentage of employed households increased.
(5) Unemployed-Number of Work-Able households	PH 34 out of 168 HCV 601 out of 1473 Total 635 out of 1641	656 out of 1641	PH 17 out of 143 HCV 242 out of 1,011 Total 259 out of 1,154	-
(5) Unemployed—Percent of Work-Able households	PH 20% HCV 41% Total 39%	40%	PH 12% HCV 24% Total 22%	Yes
(6) Other: Number of Work-Able Households who are employed full or part-time	PH 134 out of 168 HCV 872 out of 1473 Total 1,006 out of 1641	985 out of 1641	PH 126 out of 143 HCV 769 out of 1,011 Total 895 out of 1,154	-
(6) Other: Percentage of Work-Able Households	PH 80% HCV 59%		PH 88% HCV 76%	Yes



who are employed full or part-time	Total 61%	60%	Total 78%	
(6) Other: Number of households who transitioned from one job to another without a rent decrease during a period of unemployment of 90 days or less	0	120	192	Yes
(6) Other: Percentage of households who transitioned from one job to another without a rent decrease during a period of unemployment of 90 days or less	0%	50%	192/312=62 %	Yes

<b>SS #4 Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving TANF assistance (Decrease)	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #1 Interim Re-examinations</b>				
<p>HUD has requested this standard metric to be included with this initiative. This initiative on Interim Reviews has no effect on a family's participation in, use of, or eligibility for Temporary Assistance for Needy Families (TANF). Families will not be removed from or added to TANF as a result of this initiative. LHA gave a voucher admission preference for TANF families through January 31, 2015. New admissions as well as changes in current households receiving TANF will cause the numbers to vary over time, but this variance is attributed to factors other than this initiative.</p>				
<b>Unit of Measurement</b>	<b>Baseline (April 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving TANF Assistance (decrease)	PH: 25 HCV: 461 TOTAL = 486	PH: 25 HCV: 460 TOTAL = 485	PH: 15 HCV: 238 TOTAL = 253	Yes

**SS #8 Households Transitioned to Self-Sufficiency**

**HUD instructions for this metric are shown in the following two rows:**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark

**Rent Reform #1 Interim Re-examinations**

PHA Definition of Self-Sufficiency: For this metric, LHA is defining self-sufficiency as families who voluntarily end participation in the voucher or public housing program.

<b>Unit of Measurement</b>	<b>Baseline (FY 2013)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency	HCV: 320 Households  PH: <u>17 Households</u>  TOTAL: 337 Households	HCV: 320 Households  PH: <u>17 Households</u>  TOTAL: 337 Households	HCV: 277 Households  PH: <u>25 Households</u>  TOTAL: 302 Households	No –There was less transition to self-sufficiency due to COVID-19 and economy changes.

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

The following table shows the number of job losses or job changes during the target month. In 89% of the cases, no decrease in rent was required.

<b>METRIC</b>	<b>BASELINE</b>	<b>BENCHMARK</b>	<b>OUTCOME</b>
Reported job loss or job change with an effective action date in the month of November	Annual and Interim Reviews Effective 11/1/2010	Percentage of the job changes which did not result in a rent decrease	Annual and Interim Reviews Effective 11/1/2021
Total number of job losses or job changes	76		47
Number job losses or job changes requiring a rent decrease	15		5
Number of job losses or job changes which did not result in a rent decrease	61		42
Percent with no rent decrease	80%	50% or more	89%

Hardships: Of the 5 job losses that required rent decreases, none received an immediate hardship rent reduction for good cause. All five (5) received a rent reduction after a 90-day delay.

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Rent Reform 2**

### **ACTIVITY: MINIMUM EARNED INCOME**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV & PH Programs

Plan Year Proposed: April 1, 1999

Plan Year Approved: FY 2000

Plan Year Implemented: July 1, 1999

Statutory Objectives: Give incentives to obtain employment and become economically self-sufficient

#### **ii. DESCRIPTION/IMPACT/UPDATE**

LHA will include a minimum amount of earned income when calculating Annual Income whether or not a family is working. The minimum amount of earned income for families with one eligible adult will be based on 25 hours per week of employment at the federal or state minimum wage, whichever is greater. The minimum amount of earned income for families with two or more eligible adult members will be based on 40 hours per week of employment at minimum wage. LHA will count the higher of the Minimum Earned Income (MEI) or the actual earned income for the household. The minimum earned income will be added to any unearned income the family receives. Eligible adults are persons 18 years of age or older who do not qualify for an exemption from the MEI. All adults in the household must be exempt in order for the household to be exempt from the minimum earned income requirements. LHA has eight categories of hardship exemptions such as illness, elderly or disabled, students, caretakers, and participants in approved self-sufficiency programs. These exemptions serve as the hardship policy for the MEI requirement.

#### **IMPACT AND OUTCOME**

LHA views the Minimum Earned Income (MEI) as one of the flagship initiatives of our MTW program. MEI promotes and encourages employment by implementing a work requirement.

The requirement lays out the basic expectation that a work-able adult should work at least 25 hours per week at minimum wage. The beauty of MEI is that it allows the family the flexibility of figuring out how to meet the rent generated by MEI, rather than a strict requirement to work a certain number of hours at a job. In that sense, MEI acts similar to a minimum rent. It is not strictly a minimum rent, because families can have other sources of income besides MEI that are included in the rent calculation with MEI, or can be exempt from MEI. In addition, because the rent calculation is based on an expected level of earned income, each income review with a family involves a conversation about work and the expectation to work. This was a major change in focus from our previous communication with tenants - from just calculating the numbers to discussing work as a basic expectation.

Since implementing the MEI policy in 1999, it has gradually changed due to increases in minimum wage. The original MEI was based on a federal and state minimum wage of \$5.15 per hour. The following chart shows the changes in MEI over time. The federal minimum wage has not changed since 2009. However, due to a state voter initiative, the state minimum wage increased to \$8.00 in 2015 and to \$9.00 in 2016. The MEI will continue to be adjusted in accordance with changes in the federal or state minimum wage.

<b>Effective Date</b>	<b>Minimum Wage</b>	<b>MEI for 1 person</b>	<b>MEI for 2 persons</b>
July 1, 1999 (start of MTW)	\$5.15	\$6,698	\$10,712
July 24, 2007	\$5.85	\$7,605	\$12,168
July 24, 2008	\$6.55	\$8,515	\$13,624
July 24, 2009	\$7.25	\$9,425	\$15,080
January 1, 2015	\$8.00	\$10,400	\$16,640
January 1, 2016	\$9.00	\$11,700	\$18,720

The maximum amount of MEI for a household is shown above. Actual MEI is reduced by the amount of earned income for the household. Where the chart shows 1 or 2 persons, it is referring to the number of adults who are “eligible to work” or “work-able” meaning they do not have one of the hardship exemptions from MEI. If there is a household with 2 adults but one is exempt, then the column labeled “MEI for 1 person” is used.

**COVID-19.** During the course of March 2020, the final month of our FY19-2020 fiscal year, the country underwent a monumental economic shutdown in response to the COVID-19 pandemic. In response LHA discontinued applying MEI during income reviews through June 30, 2021. Because we did not apply MEI at initial, interim or annual recertifications, the data for

FY2021 saw a decline in MEI households. For FY22 we saw a rebound in the number of MEI households, comparable to pre-Covid-19 years.

Data for the MEI initiative shows that at the end of FY 2021-22, there were 27 households who had MEI in Public Housing and 339 in the Housing Choice Voucher program. Note, however, that the amount of income added to each of these MEI households may be anywhere from \$1.00 to the maximum \$18,720 for a household with two adults and no exemptions and no earned income. The Total Tenant Payment for a household with two adults at the maximum MEI would be \$421.

MEI is shown to promote and encourage employment through the outcomes for households ending the MEI requirement. Along with employment, we also see education or participation in a self-sufficiency program as positive steps toward future employment. During this fiscal year, we tracked 74 households that ended their MEI requirement and 53% of those households ended their MEI requirement through employment or participation in education or a self-sufficiency program. This outcome is a good indicator that the MEI requirement encourages people toward employment or toward education and training leading to employment.

Further data on the positive effect of the MEI requirement is the total number of households with wages. The data in the tables for Rent Reform Initiative #1 clearly show a high percentage of households with wages, another indication that our program emphasis on work expectations is successful. Both programs were above benchmark. The unemployment rate in Lincoln has declined and is currently very low at 2.1% (March 2022), this is down 0.8 % from the March 2021 rate.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>SS #1 Increase in Household Income</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Average earned income of households affected by this policy in dollars (increase)	Average earned income of households affected by this policy prior to implementation of the activity in (dollars)	Expected averaged 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 after implementation (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #2 Minimum Earned Income</b>				

The data for this initiative is the average earned income of households that have earned income.

Unit of Measurement	Baseline (April 2014)	Benchmark	Outcome	Benchmark Achieved
Average earned income of households with earned income	PH : \$22,643 HCV: \$14,127	PH: \$22,000 HCV: \$14,000	PH \$30,634 HCV \$19,587	Yes

### SS #3 Increase in Positive Outcomes in Employment Status

HUD Instructions for this metric are shown in the following three rows.

Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in a Job Training Program (5) Unemployed (6) Other	Head(s) of household in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number)	Actual head(s) of households in <<category name>>after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
	Percentage of total work-able households in <<category name>>prior to implementation of activity (percent). This number may be zero	Expected percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

### Rent Reform #2 Minimum Earned Income

For this metric, we are measuring the households who end the Minimum Earned Income (MEI) requirement because of education, job training (self-sufficiency) program, and employment. The denominator for the percentages is the number of households who ended MEI during the year.

We are using the following from the standard units of measurement:

Category 3 Education

Category 4 Job Training

Category 6 Other—Employed at more than Minimum Earned Income

Unit of Measurement	Baseline (1999—Pre-MTW)	Benchmark	Outcome	Benchmark Achieved
(3) Number of MEI Households Enrolled in an Educational Program	0	PH: 1 HCV: 14  TOTAL = 15 out of 500	PH: 0 HCV: 3  Total = 3 out of 74	
(3) Percentage of MEI Households Enrolled in an Educational Program	0%	3%	4%	Yes
(3) Number of MEI Households Enrolled in a Job Training Program	0	PH: 1 HCV: 14  TOTAL = 15 out of 500	PH: 0 HCV: 9  Total = 9 out of 74	
(3) Percentage of MEI Households Enrolled in a Job Training Program	0%	3%	12%	Yes

(6) Other: Number of MEI Households employed at more than Minimum Earned Income	0	PH: 5 HCV: 70  TOTAL = 75 out of 500	PH: 4 HCV: 23  Total = 27 out of 74	
(6) Other: Percentage of MEI Households employed at more than Minimum Earned Income	0%	15%	36%	Yes

<b>SS #4 Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving TANF assistance (Decrease)	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #2 Minimum Earned Income</b>				
TANF households are not affected by the Minimum Earned Income (MEI) policy. As a result, the data is zero (0).				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of MEI Households who receive TANF	0	0	0	Yes

<b>SS #5 Households Assisted by Services that Increase Self-Sufficiency</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving services aimed to increase self-sufficiency (increase)	Households receiving self-sufficiency services prior to implementation of the activity (number)	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #2 Minimum Earned Income</b>				
Minimum Earned Income (MEI) households, by definition, are households who are work-able and not participating in self-sufficiency activities. If participating in self-sufficiency activities, these households would be exempt from the MEI requirement. Data will continue to be zero (0).				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
MEI Households who receive self-sufficiency services	0 Households	0 Households	0 Households	Yes



### SS #6 Reducing per Unit Subsidy Costs for Participating Households

HUD Instructions for this metric are shown in the following two rows.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease)	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars)	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars)	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
Rent Reform #2 Minimum Earned Income				
The baseline data for this initiative is the average Housing Assistance Payment (HAP) of households subject to the Minimum Earned Income (MEI) policy if the MEI policy were not implemented. The Outcome is the current average HAP of families subject to MEI.				
Unit of Measurement	Baseline (November 2013)	Benchmark	Outcome	Benchmark Achieved
Average amount of subsidy per MEI Households	\$533	\$490	\$588	NO- HAP costs are lower due to MEI, but are increasing relative to baseline over time due to increasing rental costs. We raised this benchmark in the FY23 Plan

Another measure of HAP savings not dependent on rental costs might be to compare average TTP of MEI households (\$428) compared to the average TTP of the same households if MEI was not included (\$190), a difference of \$238 per household per month.

### SS #7 Increase in Agency Rental Revenue

HUD Instructions for this metric are shown in the following two rows.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars)	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark
Rent Reform #2 Minimum Earned Income				
This change to the interim re-examination policy was not intended and will not have significant effect on rental revenue. However, we expect total revenue to go up moderately over time due to inflation				
Unit of Measurement	Baseline (FY 2008)	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	HCV: \$7,331,316 PH: \$ 997,006 TOTAL REVENUE: \$8,328,322	HCV: \$9,122,960 PH: \$855,066 TOTAL REVENUE: \$9,978,026	HCV: \$9,840,659 PH: \$864,272 TOTAL REVENUE: \$10,704,931	Yes

<b>SS #8 Households Transitioned to Self-Sufficiency</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #2 Minimum Earned Income</b>				
PHA Definition of Self-Sufficiency: For this metric, LHA is defining self-sufficiency as families who voluntarily end participation in the voucher or public housing program.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2013)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency	HCV: 320 Households PH: <u>17 Households</u> TOTAL: 337 Households	HCV: 320 Households PH: <u>17 Households</u> TOTAL: 337 Households	HCV: 277 Households PH: <u>25 Households</u> TOTAL: 302 Households	No –There was less transition to self-sufficiency due to COVID-19 and economy changes.

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

As an additional metric, we looked at MEI households who terminated from either public housing or housing choice voucher programs. Our data below shows that one public housing MEI household and 19 Voucher MEI households terminated their assistance during the fiscal year. This was 2.85% of all public housing terminations and 4.3% of all voucher terminations.

MEI households made up 13.8% of public housing households and 11.6% of total voucher households at the end of the fiscal year. This data shows there is not a disproportionate number of households with MEI who terminate assistance compared to other households who terminate assistance.

METRIC	BASELINE (Revised)*	BENCHMARK	OUTCOME
Comparison of MEI households terminated from public housing and housing choice vouchers in proportion to non-MEI households	April 1, 2010 to March 31, 2011	MEI households will have an equal or lower percentage of terminations relative to the proportion of MEI households to total households	April 1, 2021 to March 31, 2022
Number\Percent of MEI households (year-end)	HCV: 466 out of 2,918 16.0% PH: 28 out of 320 8.8%		HCV: 339 out of 2,919 11.6% PH: 27 out of 196 13.8%
Number\Percent of MEI households terminating (FY14)	HCV: 90 MEI households out of 500 terminations 18.0% PH: 1 MEI household out of 54 terminations 2%		HCV: 19 MEI households out of 445 terminations 4.3% PH: 1 MEI households out of 35 terminations 2.85%
MEI households terminate at a lower rate than their overall percentage of public housing units or vouchers	HCV: 18.0% PH: 2%	HCV: Less than 11.6% PH: Less than 13.8%	HCV: 4.3% PH: 2.85%

For MEI households who terminated their public housing lease or ended voucher participation, the following table shows the reasons for termination during the period of April 1, 2021, to March 31, 2022. There were 0 MEI households who were evicted for non-payment of rent out of 445 (HCV) households who terminated during the year. In Public Housing, 0 MEI households out of 35 total terminations (0%) were for non-payment of rent.

METRIC	HCV BASELINE	PH BASELINE	HCV OUTCOME	PH OUTCOME
PH and HCV: Number of terminated MEI households & Reason for Termination	April 1, 2010 to March 31, 2011 Revised Baseline*		April 1, 2021 to March 31, 2022	
Criminal Activity	4	0	0	0
Deceased	0	0	1	0
Drug Activity	5	0	0	0
Vacate Owing	0	0	0	0
Fraud	5	0	1	0
Owner HQS Defect	0	0	0	0

Tenant HQS Defect	1	0	0	0
Other Program Violation	12	0	2	0
Moved out of town	1	0	0	0
Portable Absorbed by HA	1	0	0	0
Moved in with Relative/Friend	0	0	1	0
No Reply to Annual Re-exam	4	0	3	0
No longer Requires Assistance	15	0	5	0
Reason Unknown	0	1	0	0
Moved to Nursing Home	0	0	0	0
Vacate without Notice	21	0	1	0
Transfer to Other LHA Unit	0	0	0	0
Buying a House	2	0	2	0
Eviction—Non Payment of Rent	14	0	0	0
Eviction—Other Lease Violation	0	0	0	1
Voucher Expired	5	0	3	0
Moved to Other Assisted Housing	0	0	0	0
<b>TOTAL MEI TERMINATIONS</b>	<b>HCV: 90</b>	<b>PH: 1</b>	<b>HCV: 19</b>	<b>PH: 1</b>
<b>TOTAL TERMINATIONS</b>	<b>HCV: 500</b>	<b>PH: 54</b>	<b>HCV: 445</b>	<b>PH: 35</b>

\*Note: In the report for 2010-2011, we noted improved data collection which showed a higher number of MEI terminations. After further consideration, we determined the data for 2010-2011 was more appropriate to use as the baseline level for comparison in future years.

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## Rent Reform 3

### ACTIVITY: RENT CALCULATIONS

#### i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

<u>Programs Affected:</u>	HCV & PH Programs
<u>For Items A - D:</u>	
<u>Plan Year Proposed:</u>	April 1, 2008
<u>Plan Year Approved:</u>	FY 2009
<u>Plan Year Implemented:</u>	April 1, 2008 (new admissions and transfers) July 1, 2008 (annual reexaminations)
<u>For Item E:</u>	
<u>Plan Year Proposed:</u>	April 1, 1999
<u>Plan Year Approved:</u>	FY 2000
<u>Plan Year Implemented:</u>	July 1, 1999
<u>Plan Year Amended:</u>	FY 2016

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### ii. DESCRIPTION/IMPACT/UPDATE

A. Total Tenant Payment: Total Tenant Payment (TTP) is determined on 27% of gross income with no allowable deductions.

B. Minimum Rent: All subsidized households are responsible to pay the owner a minimum of \$25.00 for tenant rent. The higher of the TTP minus the utility allowance or \$25.00 is used to determine the tenant rent to the owner. This requirement is waived if the head of household is disabled and has a current Social Security application pending.

C. Calculation of Asset Income: For households with total assets for which the face value is equal to or greater than \$5,000, asset income will be based on a 2% rate multiplied by the face value. Verification requirements are modified to allow as first level of acceptable verification the household provided documents such as quarterly or end of year statements.

For assets under \$5,000 in face value, first acceptable verification level is self-certification of face value and income. The income will be excluded if total assets are under \$5,000.

Special Needs Trusts are an excluded asset. In 2016, the Nebraska legislature passed the Achieving a Better Life Experience (ABLE) law which authorized ENABLE accounts to allow children and adults with qualifying disabilities in Nebraska to save money without jeopardizing their eligibility for government benefits. In our 2017-2018 Plan, we excluded these types of accounts as an asset as we do the special needs trusts.

Rental properties are considered personal assets and held as investments rather than business assets. Under MTW policy, asset income from rental properties held by applicants/tenants will be calculated using either 1) the actual annual generated income from the asset, or 2) the imputed asset income by using the face value of the property multiplied by 2%, whichever is greater.

D. Verifications: LHA will utilize Enterprise Income Verification (EIV) as the first level of acceptable verification. In lieu of third-party verifications, tenant provided documents would be second level of acceptable verifications for the following situations:

Earned Income: three months' pay statements (pay stubs)

Social Security Income: the last Social Security Statement issued to the household by the Social Security Administration.

E: Other: LHA will not implement regulatory provisions related to Earned Income Disregard, public housing flat rents, imputed welfare income, and student earned income exclusions for adults 22 and older. Also, LHA will not implement regulatory provisions to include Special Needs Trusts as an asset or income even if the Special Needs Trust is making regular payments on the behalf of the beneficiary. Beginning with the plan year 2019-2020, LHA excluded income received for participation in grant-funded research on the impact that income has on the development of children in low-income families, if the income has also been excluded by the State of Nebraska for use in determining eligibility for Aid to Dependent Children. The exclusion shall not exceed \$4,000 per year for four years. The research income known as 4MyBaby gift qualifies under this exemption.

For the FSS program, escrow will be calculated using 90% of gross income as the current adjusted income

In implementing the above, a hardship policy was created for tenants who were adversely affected. Details for the hardship policies are found in the Admissions and Continued Occupancy Plan and Section 8 Administrative Plan which were included in the MTW Plan.

The hardship policy applies to existing tenants or voucher participants as of specified implementation dates. At the next annual re-certification on or after the implementation date, if it is determined that calculating TTP based on 27% of monthly gross income with no deductions

will increase the tenants TTP by more than \$25, then LHA will limit the increase by utilizing the Hardship TTP.

To calculate the Hardship TTP, LHA calculates the Monthly Adjusted Income using the household's current Annual Income minus the amount of pre-existing deductions that were utilized at the last re-examination prior to the implementation date. The Hardship TTP is calculated based on 30% of this Monthly Adjusted Income, plus an additional \$25 for each successive annual re-examination. If a tenant qualifies for the initial Hardship TTP, then LHA will calculate successive Hardship TTPs by adding an additional \$25 at each annual re-examination until the Hardship TTP equals or exceeds the TTP calculated based on 27% of monthly gross income. Each year a tenant must self-certify that the previous deductions are reasonably the same or have increased. If the amount of deductions have decreased for a tenant (for example a family no longer pays day care), then a tenant will no longer qualify for the Hardship TTP. In no case shall the Hardship TTP be less than \$50 or the Tenant Rent be less than the \$25 minimum rent.

IMPACT AND OUTCOME
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These revised methods of calculating housing assistance for households are much simpler and less prone to errors. Tenants, participants, landlords, and advocates have appreciated the greater simplicity and ease of understanding compared to traditional methods for calculating housing assistance. Our data shows staff continues to save a significant amount of processing time and improved rent calculation accuracy because of these initiatives. Our data collection process compares processing time for MTW participants versus non-MTW participants. The results of this initiative indicate approximately 4% administrative time savings per new move-in and 4% administrative time savings per annual re-examination compared to non-MTW administrative time. In the past fiscal year, LHA experienced a high turnover in staff that completes new admissions and annual re-examinations, we found that variation in experience and skill levels of staff had a significant impact on time savings, which has temporarily decreased the overall time savings of this activity.

**Improved Program Accuracy**

In January 2004 at a Public Housing Rental Integrity Summit, asset values and asset income verifications were reported to be problem areas in rent calculations as identified by HUD's Office of Policy Development and Research (PD &R). In the past, our non- MTW Section 8 New Construction program received notice of "finding" on an asset income calculation error after an audit was conducted by a third party Contract Administrator. Lincoln Housing



Authority spent a significant amount of staff time attempting to resolve the difference in asset income as perceived by the auditor and LHA. The auditor required LHA to burden the tenant with obtaining six months of bank statements. The end result of resolving the discrepancy was a significant amount of administrative time used and the tenant was stressed and inconvenienced over an asset discrepancy that had absolutely no impact on the final tenant rent calculation.

Based on this fiscal year’s internal audits, our *simplified* MTW asset verification and calculation policy continues to demonstrate a high degree of accuracy. It is also a significant factor in our administrative time savings reported elsewhere in this report.

Several of the HUD standard metrics are included at HUD request but there is no direct relationship between some of these metrics and the initiatives. Any changes are most likely related to other factors. Further impact is illustrated and discussed under Additional Local Metrics.

HUD STANDARD METRICS
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For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
These costs are based on the time savings in CE #2 (below) times average staff cost per hour of \$27.14.				
Unit of Measurement	Baseline (FY 2010)	Benchmark	Outcome	Benchmark Achieved
Total time for New Admissions	Total time: 3,858.2 hours	Time to complete the task: 3,301 hours	Total time: 1,288 hours	Yes
Total time for Annual Re-examinations	Total time: 4,126.2 hours	Time to complete the task: 3,087 hours	Total time: 4,307 hours	No - We experienced a high level of staff turnover, which has temporarily decreased the overall time savings
Total time for New Admissions and Annual Re-examinations:	Total time: 7,984.4 hours	Total time: 6,388 hours	Total time: 5,595 hours	Yes
Total Costs for New Admissions and Annual Re-examinations	Total time @ \$27.145 per hour = \$216,697	Total time @ \$27.14 per hour = \$173,370	Total time @ \$27.14 per hour = \$151,848	Yes

<b>CE #2 Staff Time Savings</b>				
HUD Instructions for this metric are shown in the following two rows.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
This data reflects the time for completion of new admissions and annual re-examinations.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2013)</b>	<b>Benchmark 20%-time Savings</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Time to complete New Admissions	382 minutes per new admission 606 new admissions  Total time: 231,492 minutes or 3,858.2 hours	Total time to complete the task: 3,087 hours	175.68 minutes per new admission 407 new voucher admissions 33 new admissions for PH 440 total admissions Total time 77,299 minutes or 1,288 hours	Yes
Time to complete Annual Re-examinations	117 minutes per re-exam 2,116 re-exams per year  Total time: 247,572 minutes or 4,126.2 hours	Total time to complete the task: 3,301 hours	130.64 minutes per re-exam (PH) 178 + (HCV) 1,800 = 1,978 re-exams per year  Total time: 258,406 minutes or 4,307 hours	No – We experienced a high level of staff turnover, which has temporarily decreased the overall time savings
Total time to complete New Admissions and Annual Re-examinations	Total time to complete task: 7,984.4 hours	Total time to complete task: 6,388 hours	Total time to complete task: 5,595 hours	Yes

<b>CE #3 Decrease in Error Rate of Task Execution</b>				
HUD Instructions for this metric are shown in the following two rows.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average error rate in completing a task as a percentage (decrease)	Average error rate of task prior to implementation of the activity (percentage)	Expected average error rate of task after implementation of the activity (percentage)	Actual average error rate of task after implementation of the activity (percentage)).	Whether the outcome meets or exceeds the benchmark

<b>Rent Reform #3 Rent Calculations</b>				
<b>For this metric, we are measuring the error rate on assets and deductions. Baseline is from FY 2010 non-MTW file audits.</b>				
<b>Unit of Measurement</b>	<b>Baseline (FY 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average Error Rate for Assets and Deductions	10.7%	3.0% or less	4.59%	No-the team completing certifications includes a higher-than-normal percentage of new staff that was in orientation status during the period.

<b>SS #1 Increase in Household Income</b>				
<b>HUD Instructions for this metric are shown in the following two rows.</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average earned income of households affected by this policy in dollars (increase)	Average earned income of households affected by this policy prior to implementation of the activity in (dollars)	Expected averaged 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 after implementation (in dollars)	Whether the outcome meets or exceeds the benchmark

<b>Rent Reform #3 Rent Calculations</b>				
The data for this initiative is the average earned income of households with earned income.				
<b>Unit of Measurement</b>	<b>Baseline (April 2014)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
	PH \$22,643 HCV \$14,127	\$22,000 \$14,000	PH \$30,634 HCV \$19,587	Yes

<b>SS #3 Increase in Positive Outcomes in Employment Status</b>				
<b>HUD Instructions for this metric are shown in the following three rows.</b>				
<b>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time	Head(s) of household in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number)	Actual head(s) of households in <<category name>>after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark

(3) Enrolled in an Educational Program (4) Enrolled in a Job Training Program (5) Unemployed (6) Other	Percentage of total work-able households in <<category name>>prior to implementation of activity (percent). This number may be zero	Expected percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>>after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
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**Rent Reform #3 Rent Calculations**

For this metric, we are measuring two of the units from the standard units of measurement. Note that (6) Other is used with two definitions. The first "Other" Category is Work-Able Households employed full or part-time. This is a combination of (1) Employed Full-time and (2) Employed Part-time from the HUD instructions above. This was a necessary modification by LHA.

Unit of Measurement	Baseline April 2010	Benchmark	Outcome	Benchmark Achieved
(3) Number of work-able households enrolled in an Educational Program as measured by reported educational benefit income	PH 29 out of 168 HCV 137 out of 1473  Total 166 out of 1641	166 out of 1641	PH 1 out of 143 HCV 16 out of 1,011  Total 17 out of 1,154	-
(3) Percent of work-able households enrolled in education program as measured by reported educational benefit income	PH 17% HCV 9% Total 10%	10%	PH 1% HCV 2%  Total 1%	No---the percentage of households in education decreased from baseline, however, the percentage of employed households increased.
(5) Unemployed-Number of Work-Able households	PH 34 out of 168 HCV 601 out of 1473  Total 635 out of 1641	656 out of 1641	PH 17 out of 143 HCV 242 out of 1,011  Total 259 out of 1,154	-
(5) Unemployed—Percent of Work-Able households	PH 20% HCV 41%  Total 39%	40%	PH 12% HCV 24%  Total 22%	Yes
(6) Other: Number of Work-Able Households who are employed full or part-time	PH 134 out of 168 HCV 872 out of 1473  Total 1006 out of 1641	985 out of 1641	PH 126 out of 143 HCV 769 out of 1,011  Total 895 out of 1,154	-
(6) Other: Percentage of Work-Able Households who are employed full or part-time	PH 80% HCV 59%  Total 61%	60%	PH 88% HCV 76%  Total 78%	Yes

<b>SS #4 Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
HUD Instructions for this metric are shown in the following two rows.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving TANF assistance (Decrease)	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
HUD has requested this standard metric to be included with this initiative. This initiative has no effect on a family's participation in, use of, or eligibility for Temporary Assistance for Needy Families (TANF). Families will not be removed from or added to TANF as a result of this initiative. LHA gave a voucher admission preference for TANF families through January 31, 2015. New admissions as well as changes in current households receiving TANF will cause the numbers to vary over time, but this variance is attributed to factors other than this initiative.				
<b>Unit of Measurement</b>	<b>Baseline (April 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving TANF Assistance (decrease)	PH: 25 HCV: 461  TOTAL = 486	PH: 25 HCV: 460  TOTAL = 485	PH: 15 HCV: 238  TOTAL = 253	Yes

<b>SS #5 Households Assisted by Services that Increase Self-Sufficiency</b>				
HUD Instructions for this metric are shown in the following two rows.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving services aimed to increase self-sufficiency (increase)	Households receiving self-sufficiency services prior to implementation of the activity (number)	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
For this measurement, we are counting the number of households participating in the Family Self-Sufficiency Program. This initiative was not designed to affect the number of households who receive self-sufficiency services.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2008)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Households who receive self-sufficiency services through the FSS program	120	120	120	Yes

<b>SS #6 Reducing per Unit Subsidy Costs for Participating Households</b>				
HUD Instructions for this metric are shown in the following two rows.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease)	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars)	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars)	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
This policy was designed to be revenue neutral; however, subsidy costs are expected to increase over time with rising rents and payment standards.				
Unit of Measurement	Baseline (November 2013)	Benchmark	Outcome (FY)	Benchmark Achieved
Average amount of Section 8 subsidy per household affected by this policy	\$341	\$415	\$ 460	No

We saw a steep rise in average HAP cost this year due to decreased tenant income and increasing Payment Standards and rent costs.

<b>SS #7 Increase in Agency Rental Revenue</b>				
HUD Instructions for this metric are shown in the following two rows.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
PHA Rental Revenue in dollars (increase)	PHA rental revenue prior to implementation of the activity (in dollars)	Expected PHA rental revenue after implementation of the activity (in dollars)	Actual PHA rental revenue after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
This policy was designed to be revenue neutral and will not have significant effect on rental revenue---expect total revenue to go up moderately over time due to inflation.				
Unit of Measurement	Baseline (FY 2008)	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	HCV: \$7,331,316 PH: \$ 997,006 TOTAL REVENUE: \$8,328,322	HCV: \$9,122,960 PH: \$855,066 TOTAL REVENUE: \$9,978,026	HCV: \$9,840,659 PH: \$864,272 TOTAL REVENUE: \$10,704,931	Yes

<b>SS #8 Households Transitioned to Self-Sufficiency</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric.	Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (<<PHA definition>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #3 Rent Calculations</b>				
PHA Definition of Self-Sufficiency: For this metric, LHA is defining self-sufficiency as families who voluntarily end participation in the voucher or public housing program.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2013)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households transitioned to self-sufficiency	HCV: 320 Households  PH: <u>17 Households</u>  TOTAL: 337 Households	HCV: 320 Households  PH: <u>17 Households</u>  TOTAL: 337 Households	HCV: 277 Households  PH: <u>25 Households</u>  TOTAL: 302 Households	No –There was less transition to self-sufficiency due to COVID-19 and economy.

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

**A. Total Tenant Payment at 27%**

This initiative provides a much simpler method of calculating housing assistance for households served by LHA. The result is a savings in staff time, reduced calculation errors, and a rent calculation system that is easier for tenants to understand. The decision to use 27% of gross income for the TTP was based on our goal to continue to serve the same number of households. The minimum rent (\$25.00) is intended to create a minimum level of tenant financial responsibility and obligation to the landlord.

Savings in staff time is measured primarily through comparison of a control group (regular HUD rent calculations) and an MTW group. The control group is made up of tenants in two Section 8 New Construction Projects (Burke Plaza and New 32). The control groups are compared to a random sample of MTW participants in public housing and housing choice voucher programs. Staff time is tracked by the number of direct and indirect contacts and the amount of time for each contact. Direct contact involves a face to face client contact; indirect is client specific activities outside of face to face contact.

### Annual Re-Examinations and New Admissions

The tables below show the aggregate results of twelve staff tracking their administrative time for new admissions and annual re-examinations. The table compares administrative time in MTW and non-MTW programs. There are a number of variables that impact the time savings results. In the past fiscal year, LHA experienced a high turnover in staff that completes new admissions and annual re-examinations, we found that variation in experience and skill levels of staff had a significant impact on time savings, which has temporarily decreased the overall time savings of this activity.

<b>New Admissions</b>	<b>MTW</b>	<b>Non-MTW</b>
Average time for Activity:	175.68 Minutes	182.98 Minutes
Time Saved: 4%		
<b>Annual Reviews</b>	<b>MTW</b>	<b>Non-MTW</b>
Average time for Activity:	132.39 Minutes	137.76 Minutes
Time Saved: 4%		

We isolated the data for individual staff persons who had both MTW and non-MTW caseloads. By looking at staff that had both MTW and non-MTW assignments, the data confirms the time savings achieved through MTW initiatives. When analyzing data in this way, we can see even more clearly the significant time savings in program administration for the Public Housing and Housing Choice Voucher programs using our MTW rent structure. The following table illustrates this analysis for housing specialists who had both MTW and non-MTW caseloads.

<b>METRIC</b>	<b>BASELINE</b>	<b>BENCHMARK</b>	<b>OUTCOME</b>
Comparison of MTW and Non-MTW Administrative Time	April 1, 2009 to March 31, 2010 Average Minutes for Activity and Percent of Time Saved under MTW	Average Percent of Administrative Time Saved under MTW	April 1, 2021 to March 31, 2022 Average Minutes for Activity and Percent of Time Saved under MTW



<b>New Admissions</b> MTW compared to Non-MTW	Average Time Saved under MTW: 26.5%  (the staff in the baseline are not the same staff for the outcome)	20%	Time Saved under MTW: Staff 1: 14% Staff 2: 47% Staff 3: 24% Average: 28.3%
<b>Annual Reexams</b> MTW compared to Non-MTW	Average Time Saved under MTW: 21.0%  (the staff in the baseline are not the same staff for the outcome)	20%	Time Saved under MTW: Staff 4: 21% Average: 21%

### Hardship Households

In implementing the rent calculation based on 27% of gross income, the housing authority implemented a hardship provision which stated that a household's maximum increase in total tenant payment would not exceed \$25.00 per annual reexamination as a result of this policy. However, rent increases due to increased income do apply. Following is the number of households for whom this hardship provision applied.

Project	4-2009	3-2010	3-2011	3-2012	3-2013	3-2014	3-2015	3-2016	3-2017	3-2018	3-2019	3-2020	3-2021	3-2022
Public Housing	70	41	20	14	3	1	0	0	0	0	0	0	0	0
Housing Choice Voucher	162	88	32	19	8	6	4	4	3	2	1	1	0	0

A minimal number of households were adversely impacted from the MTW rent policy changes that eliminated program deductions and implemented a lower standard percentage on gross income to determine the TTP. The data collected above indicates that the number of households under the hardship provision for the policy has steadily declined and zero households remain under the hardship policy. The hardship provision was set to expire in 2014 but after reviewing the remaining hardship cases, we decided to continue the hardship policy without expiration. As of this fiscal year there are no longer any households subject to the hardship provision.

### B. Minimum Rent

The impact of the \$25.00 minimum rent is determined from data in our housing software. Data showing households with a \$25.00 rent are the households affected by this requirement.

	Number of Households			Number of Households				Number of Households				
	3/31/11	3/31/12	3/31/13	3/31/14	3/31/15	3/31/16	3/31/17	3/31/18	3/31/19	3/31/20	3/31/21	3/31/22
Households Responsible for \$25 Minimum Rent												
Public Housing	11	15	9	10	6	6	2	3	5	8	14	20
Housing Choice Voucher	237	175	187	113	137	117	106	76	45	72	115	66
Combined	248	190	196	123	143	123	108	79	50	80	129	86

For hardship purposes, households in which the head is disabled and has a current Social Security application pending are excluded from the requirement. Following is the data to show the number of households excluded from this requirement and whose rent was less than the \$25.00 minimum rent.

	Number of Households			Number of Households				Number of Households				
	3/31/11	3/31/12	3/31/13	3/31/14	3/31/15	3/31/16	3/31/17	3/31/18	3/31/19	3/31/20	3/31/21	3/31/22
Households Excluded from \$25 Minimum Rent												
Public Housing	0	1	0	0	0	0	0	1	1	2	2	1
Housing Choice Voucher	21	41	64	46	55	47	59	57	53	53	35	40
Combined	21	42	64	46	55	47	59	58	54	55	37	41

LHA monitored the impact of the \$25.00 minimum rent by looking at the reasons participants ended their participation in the Housing Choice Voucher program or moved out of a Public Housing unit. Data shows the minimum rent of \$25.00 does not create an undue hardship in as much as there were zero HCV and one PH rent-related evictions out of 86 households with minimum \$25 rent. Households with minimum rent are evicted less frequently for non-payment of rent compared to all other households.

METRIC	BASELINE	BENCHMARK	OUTCOME
Households Terminated due to non-payment of rent	April 1, 2009 to March 31, 2010  Number of Households	Termination Rate for non-payment of rent will be same or less for Minimum rent households compared to Other MTW households	April 1, 2021 to March 31, 2022  Number of Households
Minimum Rent Households terminated due to non-payment of rent	HCV: 0  PH: 0		HCV: 0  PH: 1
Total Number of Households terminated due to non-payment of rent	HCV: 21  PH: 1		HCV: 3  PH: 3
Termination Rate for Non Payment of Rent:  MTW households at \$25 Minimum Rent compared with All Other MTW households	<b>HCV:</b> <u>Minimum Rent households:</u> 0 out of 467 terminations = 0%  <u>Other MTW households</u> 21 out of 467 terminations = 4.5%  <b>Public Housing:</b> <u>Min Rent households:</u> 0 out of 62 terminations = 0%  <u>Other MTW households</u> 1 Out of 62 terminations = 1.6%	Rate less than or equal to Other MTW	<b>HCV:</b> <u>Minimum Rent households:</u> 0 out of 445 terminations = 0%  <u>Other MTW households</u> 3 out of 445 terminations = .01%  <b>Public Housing:</b> <u>Min Rent households:</u> 1 out of 35 terminations = 2.85 %  <u>Other MTW households</u> 3 out of 35 terminations = 8.6%

### **C. Calculation of Asset Income**

Part C of this activity is concerned with calculation of asset income. Our data is based on a snapshot taken at the end of the fiscal year.

<b>MTW Households with Zero Assets declared</b>		
	<b>Households</b>	<b>Units/Vouchers</b>
Public Housing	8	3.9%
Housing Choice Voucher	181	6.4%

<b>MTW Households with Assets between \$1 and \$4,999:</b>		
Public Housing	160	77.7%
Housing Choice Voucher	2,427	85.3%
<b>MTW Households with Assets equal to or above \$5,000:</b>		
Public Housing	38	18.4%
Housing Choice Voucher	238	8.4%

**E. Other**

**Student Income for dependents 22 years of age or older**

For Part E of this activity, we collected data on the number of students age 22 and older whose income under the non-MTW policy would have been excluded from the rent calculation. The following table shows the number of students age 22 and older whose income was counted.

<b>Number of dependent full-time students age 22 and older whose Income was included</b>
0 - Public Housing
9- Housing Choice Voucher

\$ 0 Public Housing total earned income counted  
 \$ 34,104 Housing Choice Voucher total earned income counted  
 \$ 34,104 Total Student Earned Income used in rent calculations for PH and HCV

This activity was chosen because of a public perception that earned income of all dependent adults should be used to offset housing subsidy costs. This MTW activity continues to have an

insignificant impact on rent subsidy since a total of only 9 dependent, full-time students, age 22 or older are participating in the MTW Public Housing or the Housing Choice Voucher program with earned income. The total student earned income used in rent calculations for these households was \$34,104. However, this MTW activity and data collection helps improve the public perception on providing housing subsidy to households with adult dependent students.

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## Rent Reform 4

### ACTIVITY: RENT CHOICE

#### i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

<u>Program Affected:</u>	HCV Program
<u>Plan Year Proposed:</u>	November 2007
<u>Plan Year Approved:</u>	FY 2008
<u>Plan Year Implemented:</u>	February 1, 2008
<u>Plan Year Amended:</u>	FY 2009

#### ii. DESCRIPTION/IMPACT/UPDATE

The maximum initial rent for a family shall not exceed 50% of their monthly gross income at the time of approving tenancy and executing a HAP contract.

#### IMPACT AND OUTCOME

This initiative was revised in 2008 from LHA's original MTW plan in which we did not have any cap on the amount of tenant payment for rent and utilities. LHA's original plan was strongly endorsed by residents during our original MTW planning process. Over the years, we collected experience and anecdotal information through which we determined that a number of households were overextending themselves on housing costs to the point of being unable to pay rent and thereby losing their housing. This initiative, revised in 2008, put a cap on the initial tenant rent portion at no more than 50% of monthly gross income. Utility costs are not included in the 50%. The regular voucher program limits the tenant rent plus utilities to no more than 40% of adjusted income.

The table below shows number of households at new admission or transfer whose initial tenant share of rent and utilities is greater than 40% of their monthly gross income and, at the same time, their maximum initial tenant rent is less than 50% of monthly gross income.

2009-2010	144
2010-2011	166
2011-2012	183
2012-2013	244
2013-2014	107
2014-2015	499
2015-2016	232
2016-2017	115
2017-2018	83
2018-2019	64
2019-2020	85
2020-2021	60
2021-2022	58

The revised policy establishing a cap on tenant rent being no more than 50% of the tenant's monthly income eased our concerns about program participants leasing unaffordable housing. The revised policy simply sets an absolute threshold while providing greater flexibility and housing choices to participants than the regular program rules.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>HC #5 Increase in Resident Mobility</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #4 Rent Burden (Rent Choice)</b>				
For this initiative, data shows the number of households who moved to a better unit or neighborhood while using the flexibility of this initiative.				
<b>Unit of Measurement</b>	<b>Baseline (1999 Pre-MTW)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households able to move to a better unit/or neighborhood	0	75	58	No-17% fewer families moved in FY22 than in FY21, possibly related to economy and housing market. We also increased our Payment Standards in 2021 which impacts this data.

ADDITIONAL LOCAL METRICS

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

During the 2010 -2011 reporting period, LHA began collecting data on the census tracts for MTW voucher families who were new admissions or transfers and who chose to incur rent burdens that exceed 40% of their adjusted income. Because we put the “choice” back into the housing choice voucher program, we refer to these households as “MTW Rent Choice” families for the sake of simplicity. We collected this information to determine if these families are choosing to expand their housing opportunities when incurring the higher rent burdens.



<b>Census Tract Type</b>	<b>Number of Census Tracts with New Admission or Transfer Vouchers with Rent Choice</b>	<b>Number of New Admission or Transfer Vouchers with Rent Choice</b>	<b>Percent of New Admission or Transfer Vouchers with Rent Choice</b>
Low Income	4	6	10.34%
Moderate Income	11	24	36.21%
Middle Income	11	21	41.38%
Upper Income	4	7	12.07%
	30	58	100%

The data shows that our MTW Rent Choice rule allows families greater housing choices relative to the standard voucher program rules. The MTW Rent Choice families were dispersed in a wide range of census tracts, which included 48% of families moved in to 15 middle- and upper-income tracts while 10.34% of the families moved into four different low-income census tract area.

Again this year, the data showed that the MTW policy allowed families access to several apartment complexes, including several LIHTC properties that would otherwise be unavailable to them due to their rent structures. It is clear that, by allowing families to choose a greater share of the rent burden, the MTW Rent Choice rule is important to making these properties available to more voucher families than would otherwise be possible. It is also clear that a critical variable for HCV families to move into “opportunity areas” is the availability of LIHTC properties in those areas.

This MTW initiative offers participating households more housing options within the city of Lincoln, Nebraska compared with non-MTW vouchers. Households are able to make a choice of housing in accordance with their individual financial circumstances. Voucher participants have a choice to exceed the federal rent burden limit of 40% of their adjusted income. The initiative does not impose a hardship but allows households to make a choice.

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## Rent Reform 5

### ACTIVITY: AVERAGE UTILITY ALLOWANCES

#### i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Program Affected: HCV Program

Plan Year Proposed: April 1, 1999

Plan Year Approved: FY 2000

Plan Year Implemented: July 1, 1999

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### ii. DESCRIPTION/IMPACT/UPDATE

LHA uses one standard utility allowance per bedroom size and will not issue utility reimbursement checks or payments. The utility allowances were established using the average utility cost per number of bedrooms per unit. The utility allowances are reviewed annually and adjusted based on rate changes.

The following chart shows the current Fair Market Rents (October 1, 2021) and the payment standards and target rents which are effective beginning November 5, 2021:

Bedroom Size	Fair Market Rent	Payment Standard	Payment Standard as a Percent of FMR	Target Rent	Utility Allowance
SRO	\$468	\$468	100%	\$468	\$0
0	\$624	\$629	101%	\$590	\$39
1	\$689	\$739	107%	\$655	\$84
2	\$888	\$963	108%	\$840	\$123
3	\$1,237	\$1,318	107%	\$1,140	\$178
4	\$1,440	\$1,536	107%	\$1,300	\$236
5	\$1,656	\$1,773	107%	\$1,490	\$283
6	\$1,872	\$2,010	107%	\$1,690	\$320

Tenant Protection Vouchers (TPVs) are meant to ensure there is no displacement of low-income residents as a result of various actions resulting in a loss of HUD subsidy assistance that is attached to a specific unit. HUD identifies and allocates Tenant Protection Vouchers as the special circumstances arise.

Enhanced Vouchers (EVs) are a form of TPV that, in certain circumstances, allows the gross rent to exceed the local voucher payment standard to allow existing families to remain in their units even if the owner increases the rents. Enhanced vouchers are generally issued to provide continued assistance for a family at the termination of project-based rental assistance program. If the family stays in the same project, the voucher payment standard covers the full market rent. Enhanced vouchers have several special requirements, but in all other respects are subject to rules of the tenant-based voucher program. Some of the differences include a special statutory minimum rent requirement and a special payment standard, applicable to a family receiving enhanced voucher assistance that elects to stay in the same unit. A hardship for the Moving to Work Utility Allowance was created for Enhanced Voucher households. Their existing utility allowance was “grand-fathered” as of March 1, 2017, for Enhanced Voucher households leasing in place. If the family moves, all normal voucher rules apply.

#### IMPACT AND OUTCOME

This activity has made the voucher program much easier to understand for landlords, tenants, human service agency workers, and the general public. No specific measures were designed to measure that aspect of the activity although anecdotal data over the years has proven this to be true. Human service workers whose clients have vouchers have commented that the MTW voucher program is much easier to understand versus the non-MTW voucher programs. This is one of the reasons the VA agreed to convert VASH to MTW rules. In the past, LHA hosted workshops for community human service workers. The 3 ½ hour workshops provided detailed information on the LHA programs and how tenant payments were determined. The more simplified approach to utilities was overwhelmingly supported by human service workers who attended the workshops and who provide advocacy and service coordination for their clients receiving housing assistance. LHA has continued to do outreach to individual human service agencies and has conducted numerous programs to educate human services staff about LHA’s programs.

The concept of the Target Rent is fundamental to the success of our voucher program. Tenants know to search for units at or below the Target Rent amount. They know that if they go above the Target Rent they will pay the difference in rent without additional subsidy. It is simple to understand and very customer friendly. It also provides an incentive for the tenant to seek energy efficient units or units with utilities paid by landlords. It provides an easy benchmark for

tenants, human service workers and landlords to judge if a unit will be affordable for a voucher tenant.

In the traditional HUD program, as implemented by LHA using VASH (until 10-2011) and Mainstream Vouchers, a tenant does not know exactly what rent amount they might pay, if a unit is above or below the payment standard, or if a unit will be over the 40% rent burden rule until they turn in a Request for Tenancy Approval form to LHA. They are asked to search for a unit with a complicated utility worksheet, and, for most clients, an incomplete understanding of how all the calculations fit together. It is frustrating for the tenants, human service workers, and landlords.

This activity has significantly reduced utility allowance errors each month. National statistics in the past have shown utility allowance errors to be in the top 5 of RIM errors. Data for this year shows 5 errors in MTW out of over 597 audits (new admission and recertifications.)

HUD STANDARD METRICS
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For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #5 Average Utility Allowances</b>				
This metric is the savings from not issuing utility reimbursement checks and staff time savings during client interviews and calculations.				
Unit of Measurement	Baseline (FY 1999)	Benchmark	Outcome	Benchmark Achieved
Total cost of task.	\$54,246 Cost of Utility Reimbursements  303.17 hours @ \$27.14 per hour = \$8,228  TOTAL COST = \$62,474	\$0 Cost of Utility Reimbursements  78.12 hours @ \$27.14 per hour = \$2,120  TOTAL COST = \$2,120	\$0 Cost of Utility Reimbursements  63.92 hours @ \$27.14 per hour = \$1,735  TOTAL COST = \$1,735	Yes
<b>CE #2 Staff Time Savings</b>				

<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #5 Average Utility Allowances</b>				
This metric is the amount of time to explain and calculate standard utility allowances (baseline) and then compared to a benchmark using standard utility allowances which are much easier for staff to explain and calculate and for tenants to understand.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2013)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete utility allowances in staff hours	HCV 558 new admissions @15 minutes explanation of utility allowance to new tenants and 4 minutes calculation = 10,602 minutes  HCV: 1,897 annual reviews @4 minutes calculation of utility allowances = 7,588 minutes  Total minutes = 18,190 Total hours = 303.17	HCV 558 new admissions @ 4 minutes explanation of utility allowances to new tenants and 1 minute calculation = 2,790 minutes  HCV: 1,897 annual reviews @ 1 minute calculation of utility allowances = 1,897 minutes  Total minutes = 4,687 Total hours = 78.12	HCV 407 new admissions @ 4 minutes explanation of utility allowances to new tenants and 1 minute calculation = 2,035 minutes  HCV: 1,800 annual reviews @ 1 minute calculation of utility allowances = 1,800 minutes  Total minutes = 3,835 Total hours = 63.92	Yes

<b>CE #3 Decrease in Error Rate of Task Execution</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average error rate in completing a task as a percentage (decrease)	Average error rate of task prior to implementation of the activity (percentage)	Expected average error rate of task after implementation of the activity (percentage)	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #5 Average Utility Allowances</b>				
Error rates are determined from random file audits.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average error rate in completing a task as a percentage (decrease)	15%	3% or less	<1%	Yes

<b>CE #5 Increase in Agency Rental Revenue</b>				
HUD Instructions for this metric are shown in the following two rows.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Rental revenue in dollars	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars)	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark
<b>Rent Reform #5 Average Utility Allowances</b>				
This change to the interim re-examination policy was not intended and will not have significant effect on rental revenue. However, we expect total revenue to go up moderately over time due to inflation				
<b>Unit of Measurement</b>	<b>Baseline (FY 2008)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Rental revenue in dollars	HCV: \$7,331,316 PH: \$ 997,006 TOTAL REVENUE: \$8,328,322	HCV: \$9,122,960 PH: \$855,066 TOTAL REVENUE: \$9,978,026	HCV: \$9,840,659 PH: \$864,272 TOTAL REVENUE: \$10,704,931	Yes

**ADDITIONAL LOCAL METRICS**

For this activity, no additional local metrics are provided.

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Rent Reform 6**

### **ACTIVITY: BIENNIAL RE-EXAMINATIONS**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

<u>Programs Affected:</u>	HCV and PH
<u>Plan Year Proposed:</u>	November, 2008
<u>Plan Year Approved:</u>	FY 2009 and FY 2010
<u>Plan Year Implemented:</u>	FY2009 and FY 2010

#### Public Housing:

Effective March 15, 2009 for new move-ins

Effective July 1, 2009 for current tenants

#### Housing Choice Voucher

Effective April 1, 2009 for new admissions

Effective July 1, 2009 for some current program participants (see transition plan)

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

LHA will conduct a reexamination of an elderly or disabled household at least every two years. An elderly or disabled household is any family where the head, spouse, co-head or sole member is at least 62 years of age or a person with a disability.

All households will continue to have interim reexaminations according to administrative policy.

All other household compositions will continue with an annual reexamination.



IMPACT AND OUTCOME

Tenants and voucher participants affected by this policy appreciate the reduced burden associated with the review process. In addition, they could have increased income between biennial reexaminations without a corresponding increase in their rent payment. Households continue to be eligible for rent decreases by means of interim reexaminations if they experience decreased income.

The data in our local metrics shows that we have significantly reduced the number of elderly and disabled reviews conducted per year. The two year average number of reviews in the combined programs is 852 reviews per year compared to the baseline number of 1,249 reviews representing 397 fewer reviews. However, the number of elderly and disabled households has increased substantially over time so the number of reviews relative to baseline also has been increasing, and is no longer a useful comparison. We adjusted our Benchmarks for the HUD Standard Metrics in the FY2020-21 Annual Plan to better account for the increasing number of elderly and disabled households; however, our biennials increased even more quickly. We increased the benchmark again in the FY2022-23 Annual Plan. The HCV program had 1,908 elderly and disabled households as of the end of FY22. We completed 808 biennial reviews during the year, representing 42.3% of the eligible population. The represents a substantial time and cost savings over completing reviews annually.

This time savings allowed us to expand our programs and serve more families without increasing staff. It should be noted that the MTW data collection requires a significant amount extra work time, somewhat reducing the benefit of the time savings. The time savings also has allowed us to serve more families by facilitating and offering our applicants, in addition to our program participants, a 12 hour tenant educational series called Nebraska RentWise. The time savings has also allowed our staff more quality interviewing time with our participants.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark

<b>Other Initiatives #3 Biennial Re-examinations</b>				
<b>Unit of Measurement</b>	<b>Baseline (8-1-07 to 7-31-08)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost to complete re-examinations for Elderly or Disabled Households (decrease)	PH: 191.6 hours (see CE #2) @ \$27.14 per hour = \$5,200  HCV: 1,785.6 hours (see CE #2) @ \$27.14 per hour = \$48,461  TOTAL = \$53,661	PH = 115 hours @ \$27.14 per hour = \$3,121  HCV = 1,200 hours @ \$27.14 per hour = \$29,094  TOTAL = \$35,689	PH: 53.8 hours (see CE #2) @ \$27.14 per hour = \$1,460  HCV: 1,279.1 hours (see CE #2) @ \$27.14 per hour = \$34,715  TOTAL = \$36,175	No—number of elderly and disabled households have increased over time. Despite increasing the Benchmark in the FY20-21 Annual Plan, our biennial reviews continue to increase due to increase in this population.

<b>CE #2 Staff Time Savings</b>				
HUD instructions for this metric are shown in the following two rows:				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #3 Biennial Re-examinations</b>				
<b>Unit of Measurement</b>	<b>Baseline (8-1-07 to 7-31-08)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete re-examinations for Elderly or Disabled Households	PH: 121 Re-exams for Elderly or Disabled Households @ 1.583 Hours per Re-Exam = 191.6 hours  HCV: 1,128 Re-exams for Elderly or Disabled Households @ 1.583 = 1,785.6 hours  TOTAL = 1,977.2 hours	PH = 115 hours  HCV = 1,200 hours  TOTAL = 1,315 hours	PH: 34 Re-exams for Elderly or Disabled Households @ 1.583 Hours per Re-Exam = 53.8 hours  HCV: 808 Re-exams for Elderly or Disabled Households @ 1.583 = 1,279.1 hours  TOTAL = 1,332.9 hours	No—number of elderly and disabled households have increased over time. Despite increasing the Benchmark in the FY20-21 Annual Plan, our biennial reviews continue to increase due to increase in this population.

### CE #5 Increase in Agency Rental Revenue

HUD Instructions for this metric are shown in the following two rows.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars)	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark

### Other Initiatives #3 Biennial Re-examinations

This change to the interim re-examination policy was not intended and will not have significant effect on rental revenue. However, we expect total revenue to go up moderately over time due to inflation

Unit of Measurement	Baseline (FY 2008)	Benchmark	Outcome	Benchmark Achieved
Rental revenue in dollars	HCV: \$7,331,316 PH: \$ 997,006 TOTAL REVENUE: \$8,328,322	HCV: \$9,122,960 PH: \$855,066 TOTAL REVENUE: \$9,978,026	HCV: \$9,840,659 PH: \$864,272 TOTAL REVENUE: \$10,704,931	Yes

### ADDITIONAL LOCAL METRICS

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD's Standard metrics.

Baseline data in the table below came from the PIC system. The benchmark for annual reexaminations was based on a 50% reduction from the baseline for elderly and disabled households.

#### Public Housing

For any elderly or disabled family whose annual re-examinations were scheduled to be conducted from July 1, 2009 to June 1, 2010, LHA delayed the annual re-examination to the following year and will conduct it every two years thereafter. Interim re-examinations continue to be done in accordance with policy, and elderly and disabled families are not exempt from reporting changes in household composition or other changes.

For any elderly or disabled tenants who were new move-ins on March 15, 2009 or after, LHA now schedules the next re-examination on the first of the same month two years after the move-in month. Due to the RAD conversion of Mahoney Manor to Project-based Vouchers in October 2019, the Mahoney Manor biennial re-examinations effective through October 2019 were

counted in Public Housing, and thereafter as Housing Choice Vouchers. All Mahoney Manor biennial re-examinations were included in the HCV count for Fiscal Year 2021, while a portion was counted in each program for FY2020. Due to this shift, the data shows a significant drop in the number of elderly and disabled biennial re-examinations in Public Housing.

#### Housing Choice Voucher

Beginning April 1, 2009, LHA is conducting re-examinations every two years for elderly and disabled households.

For households issued vouchers prior to April 1, 2009, LHA established a transition policy for biennial re-examinations. This transition policy was effective for current elderly or disabled households with annual re-examinations effective July 1, 2009 to June 1, 2010. In order to manage workloads during the transition to a biennial schedule, LHA randomly assigned households to one of two groups based on the last digit of the head's social security number. During implementation, group one had their next reexamination in one year and group two in two years and continuing every two years thereafter for both groups. Any elderly or disabled households designated as "hardship" households under the 27% MTW policy were immediately placed in group two. This biennial initiative further reduced the impact of the 27% MTW policy and created an additional benefit for the hardship group.

Due to the RAD conversion of Mahoney Manor to Project-based Vouchers in October 2019, the Mahoney Manor biennial re-examinations effective through October 2019 were counted in Public Housing, and thereafter as Housing Choice Vouchers. All Mahoney Manor biennial re-examinations were included in the HCV count beginning in Fiscal Year 2021. Due to this shift, the data shows an increase in the number of elderly and disabled biennial re-examinations in HCV, and a decrease in Public Housing. This is in addition to the ongoing trend of an increasing number of elderly and disabled households in the program.

In the following table, Baseline data was taken from PIC system whereas subsequent data was taken from housing software reports. Baseline data is, in fact, under-reported because PIC data showed only the last action in PIC.

The total number of elderly and disabled households has increased since baseline, which has caused the number of reviews to steadily increase relative to baseline. Comparing the number of reviews to baseline, as we have done each year in the chart below, has become a less and less meaningful number. As reported in the data for Other Initiative 6, the total number of elderly and disabled households in the HCV program at the end of FY22 was 1,908. We completed 808 biennial re-certifications during the year, approximately 42.3% of those eligible households, which is a significant time savings.

METRIC	BASELINE*	BENCHMARK		OUTCOME		OUTCOME	
Annual Re-Examinations in a 12 month period	August 1, 2007 to July 31, 2008	50% reduction for elderly and disabled households		April 1, 2020 to March 31, 2021		April 1, 2021 to March 31, 2022	
		Number of Reviews & Percent of Baseline		Number of Reviews & Percent of Baseline		Number of Reviews & Percent of Baseline	
<b>Public Housing</b>							
Elderly Households	61	31	50%	7	11.5%	8	13.1%
Disabled Households	60	30	50%	14	23.3%	26	43.3%
<b>TOTAL</b>	121	61	50.4%	21	17.4%	34	28.1%
		<b>Average over 2 years:</b>				<b>(21+34) / 2 = 28 reviews</b>	
						<b>23.1%</b>	
<b>Housing Choice Voucher</b>							
Elderly Households	360	180	50%	367	102%	351	97.5%
Disabled Households	768	384	50%	472	61.5%	457	59.5%
<b>TOTAL</b>	1,128	564	50.0%	839	74.4%	808	71.6%
		<b>Average over 2 years:</b>				<b>(839+808)/2= 824 reviews</b>	
						<b>73%</b>	

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## Other Initiatives 1

### ACTIVITY: INCOME ELIGIBILITY

#### i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED

Programs Affected: HCV & PH Programs

Plan Year Proposed: April 1, 1999

Plan Year Approved: FY 2000

Plan Year Implemented: July 1, 1999

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### ii. DESCRIPTION/IMPACT/UPDATE

All applicants for HUD subsidized units must provide adequate evidence that the household's anticipated annual income for the ensuing twelve month period does not exceed the following income limits based on area median income adjusted for family size:

Public Housing: 50% of median income

Housing Choice Voucher: 50% of median income.

Income targeting will not be used.

#### IMPACT AND OUTCOME

Lincoln Housing Authority is using its MTW authority to waive income targeting standards. Rather than use national income targeting standards, LHA has designed its preference system to fit local needs and local program goals.

LHA does not measure income targeting on an on-going basis, nor do we alter the order of the

waiting list to meet income targeting goals. We did review the admissions for the fiscal year for this report. In the Public Housing and Voucher Programs, 100% of new admissions were very low income or extremely low income.

It is reasonable to expect that the voucher program will continue to meet federal targeting standards, given the nature of the preference system. The Public Housing program is smaller and could be prone to yearly changes in income levels due to small variations in the number of vacancies and the number of disabled families vs. working families.

**HUD STANDARD METRICS**

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #1 Income Eligibility</b>				
Baseline agency cost is calculated from the baseline hours in CE#2 Staff Time Savings multiplied by \$27.14 per hour.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	55 hours @ \$27.14 \$1,493	\$0	\$0	Yes, no time spent on income targeting

<b>CE #2 Staff Time Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark



### Other Initiatives #1 Income Eligibility

Time savings is determined from the extra amount of time to follow income targeting rules when offering a unit.

Unit of Measurement	Baseline (FY 2014)	Benchmark	Outcome	Benchmark Achieved
Total time to complete the task--unit offers for public housing, extra time spent when utilizing income targeting requirements	.82 hours times 67 public housing move-ins.  55 hours	0 hours	0 hours	Yes, no time spent on income targeting.

#### ADDITIONAL LOCAL METRICS

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD's Standard metrics.

### Other Initiatives #1 Income Eligibility

This metric shows the percentage of households at 3 income levels at the time of admission. A benchmark is established only for extremely low income households.

Unit of Measurement	Baseline (FY 2014)	Benchmark	Outcome (FY 2022)	Benchmark Achieved
Public Housing Income levels at time of admission				
Extremely Low Income	46.27%	40%	70.69%	Yes
Very Low Income	40.30%		29.31%	
Low Income	13.43%		0%	
Housing Choice Voucher Income levels at time of admission (excludes VASH participants)				
Extremely Low Income	86.9%	75%	77.59%	Yes
Very Low Income	13%		22.41%	
Low Income	0%		0%	

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 2**

### **ACTIVITY: RESPONSIBLE PORTABILITY**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program

Plan Year Proposed: April 1, 1999

Plan Year Approved: FY 2000

Plan Year Implemented: July 1, 1999

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

Voucher participants will be allowed to port out upon request only as a reasonable accommodation for employment, education, safety or medical/disability need.

#### **IMPACT AND OUTCOME**

The purpose of responsible portability in our MTW program is to reduce costs and prevent families from porting out with their voucher because of our MTW policies. It was anticipated that some families would choose to port out just to avoid the work requirements and other expectations of the MTW program. Portability was allowed for specific reasons as listed above.

Our policy represents a successful implementation of a responsible policy that could be adapted on nationwide basis. Portability represents a difficult and time-consuming administrative issue in the voucher program across the country. Allowing HA's to adopt policies that limit ports to verifiable, good cause reasons would improve efficiency in voucher program administration nationwide.

LHA has seen an increase in recent years of waiting list shopping – applicants from other parts of the country applying for a voucher in Lincoln to take back to their home state. Most of the increase in our portability is a result of this practice. Often applicants are working in their home state, come to Lincoln for a voucher and port back home under the employment exception, in

some cases to the same job they had prior to moving.

In April 2019 LHA modified its Administrative Plan to not permit voucher participants to port-out to housing authorities whose Fair Market Rents exceed the LHA Fair Market Rents unless the receiving PHA will absorb the LHA voucher. This restriction is not applicable in cases of Emergency Transfer outlined in Section XXVIII of the Administrative Plan.

**HUD STANDARD METRICS**

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #2 Responsible Portability</b>				
For this metric, we compare the average HAP cost for a port voucher with a local voucher. To determine the baseline, we used a national averaged number of ports to estimate the number of ports we would potentially have if we did not have responsible portability. 11% is the national portability rate and 3% is the national portability billed rate.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome (time tracking and as reported in VMS)</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars	1.422 hours (from CE#2) @ \$27.14= \$38,593  2,916 authorized vouchers at 3% billed portability rate = 88 average per month billed port vouchers at \$901.40 per voucher for 12 months = \$951,878  TOTAL = \$990,471	377 hours @ \$27.14 = \$10,232  60 billed port vouchers at \$1,200.00 per voucher for 12 months = \$864,000  TOTAL = \$874,232	208.21 hours @ \$27.14 = \$5,651  15.83 average per month billed port vouchers at \$11,476 per voucher per month for 12 months = \$280,416  TOTAL = \$286,067	Yes

<b>CE #2 Staff Time Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #2 Responsible Portability</b>				
We conducted a study of the time for administering individual ports multiplied by the estimated number of potential ports if we did not have responsible portability. The PIC Mobility and Portability Report (7/31/13) shows 11% portability in the United States.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Time to complete the task in hours	1,422 hours based on 11% portability rate or 321 per year at 4.43 hours per voucher	377 hours based on 85 ports per year at 4.43 hours per voucher	208.21 hours for 47 port-outs in FY21-22 at 4.43 hours per voucher	Yes

In FY 2014, we did a time study on the amount of administrative time it takes per portable voucher and found the amount of time at 4.43 hours per voucher.

<b>CE #5 Increase in Agency Rental Revenue</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Rental revenue in dollars	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars)	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #2 Responsible Portability</b>				
<b>Unit of Measurement</b>	<b>Baseline (FY 2008)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Rental HCV revenue in dollars—PH Revenue is Not Applicable to this initiative	TOTAL HCV REVENUE: \$7,331,316	TOTAL HCV REVENUE: \$8,701,100	HCV: \$9,840,659	Yes

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

Our data below shows the number of formal requests to port out and the number approved. Families are given information about our responsible portability policy, and it is recognized that once people are aware of the policy, fewer formal requests are made.

<b>Other Initiatives #2 Responsible Portability</b>				
The total number of requests will not always match the total number of completed port-outs in a given year. We don’t count the port-out until the family is housed in a new community.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2008)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Percentage of Requests Approved to Port with Voucher---Medical or Disability Requests	9 Approved out of 9 Requests 100%	100%	20 Approved out of 21 Requests 95%	No Unable to verify a necessity for denied request
Percentage of Requests Approved to Port with Voucher---Safety Requests	5 Approved out of 5 Requests 100%	100%	3 Approved out of 3 Requests 100%	Yes
Percentage of Requests Approved to Port with Voucher---Education Requests	1 Approved out of 1 Requests 100%	100%	1 Approved out of 1 Requests 100%	Yes
Percentage of Requests Approved to Port with Voucher---Employment Requests	5 Approved out of 5 Requests 100%	100%	22 Approved out of 22 Requests 100%	Yes
Percentage of Requests Approved to Port with Voucher---Other Requests	0 Approved out of 3 Requests 0%	0%	0 Approved out of 0 Requests 0%	Yes

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

Non

## **Initiative 4**

### **ACTIVITY: HQS INSPECTIONS WAIVER**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program

Plan Year Proposed: November, 2008

Plan Year Approved: FY 2009

Plan Year Implemented: April 1, 2009

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

To encourage participating landlords and tenants to maintain their units in compliance with Housing Quality Standards (HQS), the required annual inspection will be waived for one year if the annual inspection meets 100% HQS upon first inspection at initial or annual inspection. All units will be inspected at least every other year. This initiative will also allow inspections to coincide with the next annual reexamination date rather than HUD's interpretation that inspections be conducted within 365 days of the previous inspection. HUD's interpretation resulted with a schedule of re-inspections every 10 months to ensure compliance with the interpretation of "every 365 days." Special inspections will continue to occur as determined by LHA.

HUD's Request for Tenancy Approval (RFTA) form was modified to satisfactorily implement this inspection incentive initiative. LHA developed a local form, the Request for Inspections and Unit Information form, which is used in lieu of HUD's RFTA form HUD 52517 to make it easier for tenants and landlords to understand and to reflect a city ordinance change that required all landlords to provide all trash services. This local form was created with our Landlord Advisory Committee. The local form can be found in Appendix C.

**IMPACT AND OUTCOME**

This initiative is ongoing since April 1, 2009. LHA is monitoring the impact of this policy through a variety of measurements such as; 1) number of annual voucher program inspections completed, 2) the percentage of annual HQS inspections passing at the first inspection and 3) the number of complaint inspections. Our biggest challenge is to ensure the proper implementation and monitoring of this policy. The reports and data-gathering are cumbersome and time consuming. It is complicated to create a monthly annual inspection schedule because inspections that pass the first time must be identified by the inspection date and last passed inspection date then associated with annual eligibility review dates to determine the correct units to inspect. If the policy was to complete biennial inspections for “all” units regardless of the results of the inspection, it would be much simpler to implement and audit. However, to retain the quality of the units, we believe it is necessary to retain an annual inspection cycle for some properties.

The inspection waiver policy no longer needs a Moving to Work waiver as the HCV voucher program rules have changed in a final rule published on March 8, 2016 in the Federal Register number 5743-F-03. However, the use of the modified Request for Tenancy Approval form and the ability to coincide annual inspections with recertification dates does require a waiver.

The inspection waiver policy continues to have positive impact on the voucher program by providing administrative cost savings to LHA, and improving our community’s housing stock. It has proven to be an effective way to distinguish better maintained property and inspect those units less often.

LHA conducted more inspections this year due to doing inspections skipped or self-certified during the first year of Covid-19 shut-downs. Therefore, the data for this initiative does not reflect a typical year.

**HUD STANDARD METRICS**

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark



<b>Other Initiatives #4 HQS Inspections Waiver</b>				
Agency cost is based on the number of inspection hours at a staff cost per hour of \$28.88.				
<b>Unit of Measurement</b>	<b>Baseline (FY 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task	3,042 hours @ \$28.88 per hour = \$87,853	2,000 hours @ \$28.88 per hour = \$57,760	1,938 hours @ \$28.88 per hour = \$55,969	Yes

<b>CE #2 Staff Time Savings</b>				
HUD instructions for this metric are shown in the following two rows:				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #4 HQS Inspections Waiver</b>				
<b>Unit of Measurement</b>	<b>Baseline (FY 2010)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete inspections	3,042 annual inspections @ 1 hour per inspection  3,042 hours	2,000 annual inspections @ 1 hour per inspection  2,000 hours	1,938 annual inspections @ 1 hour per inspection  1,938 hours	Yes

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD's Standard metrics.

### Other Initiatives #4 HQS Inspections Waiver

For this initiative, we projected a 25% reduction in total inspections from baseline. This initiative has an incentive in the form of a waiver for the next annual inspection if the tenant has remained the same and the unit had 100% HQS compliance for the annual or initial “pick up” inspection. If at any time the unit requires a special inspection, the inspection incentive is revoked and the unit must have an annual inspection completed by the tenant’s next annual re-examination date.

Unit of Measurement	Baseline (FY 2010)	Benchmark	Outcome	Benchmark Achieved
Number of		25% reduction from Baseline		
-Annual Inspections	3,042	2,000	1,938	
-Initial Inspections	825	1,200	1,012	
-Special Inspections	44	44	40	
TOTAL INSPECTIONS (decrease)	3,911	3,244 (667 decrease)	2,990	Yes
Number of units that passed on first inspection	2,034	1,687	1,619	
Percentage of units that passed on first inspection	52%	52%	54%	Yes

The pass rate was 52% for FY2010 when units were annually inspected in comparison to 54% pass rate for FY2022 when a combination of units were inspected annually and biennially. In addition, we gathered data on the pass/fail rate for biennial unit inspections. The chart below indicates that skipping annual inspections does not have a significant impact on the quality of the unit or increase the failure rate at first inspection. Indeed, the results showed that the units inspected biennially are much more likely to be in good condition and pass inspection, while the units inspected annually are much more likely to fail initial inspection. This system has proven to be an objective and reasonable way to target problem properties.

### Inspection results comparing biennial inspections to annual inspections

	April 2021 - March 2022 Percent inspections passing at First Inspection	Number of annual/biennial inspections during fiscal year	Number of inspections that passed first time
Biennial (skipped) Inspections	68%	1060	720
Annual Inspections (not previously skipped)	17%	878	150

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 5**

### **ACTIVITY: INSPECTIONS & RENT REASONABLENESS**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program

Plan Year Proposed: November, 2010

Plan Year Approved: FY 2012

Plan Year Implemented: April 1, 2011

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

LHA will perform all Inspections and Rent Reasonableness determinations on all tenant and project-based voucher units regardless of ownership of property management status including those that are owned or managed by LHA.

#### **IMPACT AND OUTCOME**

LHA performs inspections and rent reasonableness determinations on the property owned or managed by LHA. This initiative has eliminated the administrative work and cost of acquiring and maintaining a contract to perform inspections and rent reasonableness determinations. Cutting out an additional step improves administrative efficiencies, eliminates confusion for the voucher participant, and improves the response time for performing inspections. LHA properties are generally in better condition than the average rental units participating in the voucher program. Our most recent report showed 74% of LHA properties passed at first inspection compared to 54% for all voucher properties. For 2021-2022, cost savings by not hiring an outside contractor was estimated at \$8,364.

LHA has always inspected LHA-owned or managed properties under Public Housing, Tax Credit and Section 8 New Construction programs. The inspection audits including REAC inspections resulted in high scores and no significant findings

We did not expect any adverse impacts by implementing this activity. LHA maintains an internal check and balance system to ensure the quality and safety within their managed or owned property. This check and balance has been created through a segregation of duties. LHA has established seven departments and managers for each department. Specifically, the Tenant-Based Department is responsible for the voucher program compliance while the Project-Based Department is responsible for maintaining and leasing LHA units. The segregation of duties allows the Tenant-Based department the ability to enforce HQS and rent reasonableness policies at the same level and effectiveness as working with a private landlord.

Eliminating the requirement to contract for these services also eliminated the administrative time in creating, advertising and monitoring outside contractors. In the past, LHA had been unable to find any expert in the community to perform these services or to perform them in a timely manner.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #5 Inspections and Rent Reasonableness</b>				
Baseline cost is the contract cost calculated as a product of the number of inspections on LHA-owned or managed properties at \$50 per inspection. LHA's cost to do the same inspections is based on 1 hour per inspection @28.88 per hour.				
<b>Unit of Measurement</b>	<b>Baseline (10-1-09 to 9-30-10)</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task	256 inspections at \$50 per inspection  \$12,800	633 inspections @1 hour @ \$28.88 per hour  \$18,281	396 inspections @1 hour @ \$28.88 per hour  \$11,436	Yes

<b>CE #2 Staff Time Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #5 Inspections and Rent Reasonableness</b>				
This metric is the number of staff hours to complete the inspections of LHA-owned or managed properties. The baseline shows 0 staff hours when inspections are done by contract inspectors on a fee basis per inspection				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total staff hours to complete the task.	0 staff hours for inspections with contract inspectors----fee per inspection	633 inspections @ 1 hour per inspection = 633 hours	396 inspections @ 1 hour per inspection = 396 hours	Yes

<b>CE #3 Decrease in Error Rate of Task Execution</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average error rate in completing a task as a percentage (decrease)	Average error rate of task prior to implementation of the activity (percentage)	Expected average error rate of task after implementation of the activity (percentage)	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #5 Inspections and Rent Reasonableness</b>				
Error rates for inspections are neither tracked nor applicable so there is no baseline or benchmark data. This outcome measure will be reported as 0%. The metric does not apply to inspections.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Average error rate in completing inspections	0%	0%	0%	Yes

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

<b>Other Initiatives #5 Inspections and Rent Reasonableness</b>				
With this measurement, we are looking to see if LHA owned or managed properties maintain a higher first-time pass rate on inspections compared to non-owned or non-managed properties.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Owned or managed properties will maintain a higher first time pass rate compared to the pass rate of non-owned or non-managed properties	121 out of 186 owned or managed properties pass inspection on the first time 65%	53% (voucher first time pass rate)	294 out of 396 owned or managed properties pass inspection on the first time. 74%	Yes

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 6**

### **ACTIVITY: PROJECT-BASED SECTION 8 UNITS**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program

**Project-based units through other competitive process:**

Plan Year Proposed: FY 2010

Plan Year Implemented: Pending receipt of a viable application

**Project-based units LHA owned or managed properties:**

Plan Year Proposed: FY 2013

Plan Year Approved: FY 2013

Plan Year Implemented: FY 2013 to FY 2016

Statutory Objective: Increase housing choice for low income families

Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

The Moving to Work waivers being used are: 1) to transition LHA owned or managed units into Section 8 project-based assistance without a competitive bid, 2) allow the project-based sites to maintain a site-based waiting list, 3) allow the 25% unit allocation per project cap be removed, 4) allow unit amendments to the project-based HAP contract beyond the three year limit in order to add units not initially included, 5) eliminate the requirement to furnish a copy of each inspection report to the HUD field office, 6) allow zero HAP participants to occupy a unit indefinitely and the unit will remain designated as a project-based unit under contract, 7) implement the utility allowances in accordance with Rent Reform #5, 8) allow LHA to perform the functions of rent reasonableness determinations, HQS inspections, and enter into agreements to the terms of the HAP contract without the need for an independent entity for LHA-owned units, and 9) Adjust some rent requirements for public housing conversions to project-based



vouchers.

For tenants with zero HAP, if the tenant's income decreases, we will reinstate HAP payments. A zero HAP tenant will be eligible to move with a voucher in accordance with Housing Choice Voucher regulations. LHA complies with Housing Quality Standards, subsidy layering requirements, and other federal requirements regarding project-based assistance as set forth in Title 24 of the Code of Federal Regulations.

**Project-based units through other competitive process:**

LHA may project-base an additional 20 vouchers to serve the disabled through an "other competitive" process. Under MTW, LHA will allow the selected project-based site to maintain a separate site-based wait list. In a cooperative effort with the local Veterans Administration, LHA was awarded additional VASH Vouchers to be project-based. This project, Victory Park Apartments, was developed and ready for occupancy on December 1, 2017. The HAP contract was signed December 1, 2017. There was a conversion of 25 tenant-based HUD-VASH vouchers to project-based vouchers for this project.

**Project-based units LHA owned or managed properties:**

LHA will provide project-based Section 8 assistance to property owned or managed by LHA, without a competitive bid. Site selection for LHA owned or managed property will be based on the need to increase, 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.

Public Housing conversion to PBV properties

LHA will operate Public Housing converted PBV developments in accordance with the HUD requirements, the MTW Agreement, and LHA's MTW Plan, including the provision that LHA will conduct inspections and determine rent reasonableness for these vouchers.

LHA will calculate rent in the following way for tenants whose Total Tenant Payment (TTP) equals or exceeds the Gross Rent for the unit (Zero HAP tenants) in RAD developments.

Mahoney Manor. Both existing tenants (pre-RAD conversion) and new tenants (post-RAD conversion) will pay rent based on their TTP up to the Gross Rent for the unit. Zero HAP tenants will continue to pay the Gross Rent for the unit indefinitely until their income decreases or the Gross Rent increases to a point where they qualify for HAP again. A tenant's portion of rent will not increase above the RAD PBV Gross Rent for the unit.

Rent Phase-in/Hardship Policy: We have developed the following phase-in of potential rent increases for households whose TTP exceeded the 2018 public housing ceiling rents at the time of conversion. At the first scheduled annual or biennial recertification following conversion,

existing tenants at time of conversion will pay no more than the 2018 ceiling rent plus \$25.00. At the second scheduled annual or biennial recertification following conversion, existing tenants at time of conversion will pay no more than the 2018 ceiling rent plus \$50.00. At the third scheduled annual or biennial recertification following conversion, existing tenants at time of conversion will pay up to the gross rent at the time of the recertification. This applies to all conversions from public housing to PBV.

Recertification Cycles: Upon conversion from public housing to project-based vouchers, the family's last public housing annual or interim income recertification will serve as the initial certification for the voucher program. The family will remain on the same annual or biennial review cycle and schedule. This applies to all conversions from public housing to PBV.

Utility Allowances. LHA will continue to calculate unit-based utility allowances for converted Public Housing units rather than use the single Voucher utility allowance under Rent Reform Initiative #5. This will minimize disruption in the rent calculation for in-place public housing residents converting to vouchers.

IMPACT AND OUTCOME
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**Project-based units through other competitive process:**

LHA will continue to accept applications through an “other competitive process” to project base a maximum of 20 units for persons with disabilities. A previous application submitted on May 25, 2011 was not approved because it failed the environmental review. No applications were received in FY 2021.

LHA accepted a HUD-VASH project based voucher application for a new 70 unit development for homeless veterans on the Lincoln VA campus. The “other competitive process” was the VA’s selection process for an enhanced use lease agreement. LHA executed the Housing Assistance Payment Contract (HAP) for this project on December 1, 2017. All 70 units were ready for occupancy on December 1, 2017 and leasing started the same day. This development is part of the broader redevelopment of the VA campus.

As of July 17, 2015, the HUD Voucher Office has already authorized LHA to use 15 different MTW alternative requirements when administering HUD-VASH vouchers. LHA received additional approval on July 6, 2017 for additional flexibility to allow the HUD-VASH project-based voucher site maintain their site-based waiting list and allow the standard MTW utility allowance be used when calculating the tenant’s rent portion.

### **Project-based units LHA owned or managed properties**

LHA signed a contract effective July 1, 2012 to phase-in the project-based assistance at Crossroads House during a three-year period. The phase-in period allowed the opportunity to maintain 100% leasing without undue hardship on the voucher program budget and leasing requirements and prevented the displacement of any households over the 50% median income limit. The phase-in period has been completed.

Crossroads House Apartments is elderly apartment complex with 58 one-bedroom units located in the heart of Lincoln's downtown, 1000 O Street, Lincoln, Nebraska. Since Crossroads House is a "tax credit" project, the definition of elderly is defined as 55 years or older so residents must meet that age requirement to be eligible. The income eligibility limit for Crossroads House was set at the voucher program limit of 50% of median income rather than the tax credit limit of 60% median income. LHA chose a three-year transition period to complete 100% project-based allocation at the Crossroads House. The three-year transition period, from the original executed HAP contract, prevented the displacement of 60% median income households who were currently residing in the Crossroads House apartments. The transition period also allowed the opportunity to maintain 100% voucher leasing without undue hardship on the voucher program budget and allocation requirements. At the end of the fiscal year, 58 units are project-based units.

### **Public Housing Conversion to PBV Properties**

LHA completed the Rental Assistance Demonstration (RAD) program conversion of Mahoney Manor to project-based vouchers as of October 1, 2019. Ownership of the property was transferred to a controlled affiliate non-profit, Lincoln Public Housing, Inc. HUD awarded new voucher funding for all 120 units beginning January 1, 2020. The RAD vouchers remain under the Moving To Work Program.

LHA continues planning for the conversion of the remaining 200 scattered site public housing units and intends to submit a Section 18 disposition application to HUD. Like Mahoney Manor, ownership of the properties would be transferred to Lincoln Public Housing, Inc and most units will have project-based vouchers. All units will remain available as quality affordable housing in Lincoln. Due to the extraordinary circumstances surrounding Covid19, LHA did not conduct outreach to existing public housing tenants during FY21, but restarted it in FY22. Therefore, the conversion planning has been delayed.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #1 Agency Cost Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task in dollars (decrease)	Cost of task prior to implementation of the activity in (dollars).	Expected cost of the task after implementation of the activity (in dollars)	Actual cost of the task after implementation of the activity (in dollars)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #6 Project-Based Section 8 Units</b>				
The baseline cost for this initiative is the anticipated cost for issuing a Request for Proposals (FRP) including preparation, advertising, review, and selection.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total cost of task	165 hours @ \$50 per hour = \$8,250	\$0	\$0	Yes

<b>CE #2 Staff Time Savings</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total time to complete the task in staff hours (decrease)	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #6 Project-Based Section 8 Units</b>				
The baseline cost for this metric is the anticipated staff time for issuing a Request for Proposals (RFP) including preparation, application review, and selection.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Total anticipated time for issuing a Request for Proposals	RFP Development =75 staff hours  Application Review = 30 hours times 3 applications = 90 hours  Total staff hours = 165	RFP Development = 0 hours  Application Review = 0 hours  Total staff hours = 0	RFP Development = 0 hours  Application Review = 0 hours  Total staff hours = 0	Yes

<b>HC #5 Increase in Resident Mobility</b>				
HUD instructions for this metric are shown in the following two rows:				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #6 Project-Based Section 8 Units</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of Move-ins to Project-based units at Crossroads House	0	8	15	Yes

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

<b>Other Initiatives #6 Project-Based Section 8 Units</b>				
This metric shows the impact from project-basing vouchers in an elderly designated complex to create and preserve affordable housing opportunities for elderly households.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of Elderly Households with Voucher Assistance	FY 2011 (point in time)  372 12.9% of total vouchers	390	802  27.48% of total vouchers	Yes
Number of Disabled Households with Voucher Assistance	FY 2011 (point in time)  964 33.4% of total vouchers	984	1,106  37.89% of total vouchers	Yes

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 7**

### **ACTIVITY: RENTWISE TENANT EDUCATION**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program

Plan Year Proposed: November, 2010

Plan Year Approved: FY 2012

Plan Year Implemented: October 1, 2011

Statutory Objective: Increase housing choice for low income families  
Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **ii. DESCRIPTION/IMPACT/UPDATE**

Lincoln Housing Authority is using combined MTW funds to support Nebraska RentWise, a tenant education program. This activity serves only households under 80% AMI and is related to the MTW objective of increasing housing choices for low-income families by providing training and education.

RentWise is a structured curriculum to educate renters on responsibilities necessary to become successful tenants with stable housing. Lincoln Housing Authority formed a collaborative group, the Lincoln RentWise Network consisting of representatives from an array of human service agencies in the Lincoln community. Network members identified the need for the program because of the common knowledge that many low income families had great difficulty obtaining rental housing because of past problems. Those problems include rental or credit history, lack of experience (first time renters), stigmas associated with rental assistance programs, or other issues that cause potential landlords to see them as high-risk tenants.

Using the RentWise curriculum, certified trainers teaches the knowledge and skills to be a successful renter and the issues that lead to problems for tenants. The RentWise curriculum teaches participants how to secure and maintain safe and affordable rental housing. The six-module program is offered at no cost to participants and covers topics such as how to take care of and maintain the rental unit; how to improve communication and reduce conflict between tenants and landlords; how to improve the rental experience, manage money, and information on legal rights and responsibilities. The 12 hour curriculum uses lectures, workbooks, worksheets,

demonstrations, and question & answer formats.

The Lincoln RentWise Network offers the six module educational series at least twice per month during both day and evening hours at a central location with city bus service. Lincoln Housing Authority provides coordination for registration, materials, interpreters, scheduling, tracking, and issuing certificates of completion.

#### IMPACT AND OUTCOME

The RentWise program is expected to assist low-income tenants in becoming more successful renters or housing assistance program participants. Their success as a renter will expand their housing opportunities as they improve their credit history and/or rental history. The program also teaches renters the ability make educated decisions about finding and maintaining affordable and suitable housing.

This activity was implemented October 1, 2011. Each twelve hour series is scheduled over three days and each series is scheduled at least two times per month. The program allows for 60 registrants per session and sessions are currently scheduled several months in advance. The number of classes offered is sufficient to meet the registration requests. RentWise is a pre-housing activity and participants are determined as income-eligible for RentWise based on self-declaration of income. Due to Rentwise classes being held in person and safety issues surrounding the COVID-19 pandemic, registration in sessions were reduced to allow for social distancing.

The program has been very well received by tenants and landlords. Some landlords offer incentives to RentWise graduates such as waiver of application fee, reduced deposit, or special consideration in their application. LHA offers a secondary preference for the voucher program for RentWise graduates.

When classes are able to be held, LHA has consistently had increased requests for interpreters for the RentWise program. In order to more efficiently use interpreters and manage costs as well as reduce the distractions of having interpreters in a classroom setting, LHA has obtained local grants for specialized equipment to be used by interpreters and participants.

Studies in the field of housing and the use of vouchers show that one of the biggest impediments to increasing housing choice, decreasing concentrated poverty and expanding housing opportunities is the knowledge base of the tenant, their understanding of the rental market, and their connections to the community. The RentWise program improves the knowledge base and thereby increases housing choice.



An analysis conducted in 2020 by the City of Lincoln’s Urban Development Department of the city’s eviction records and LHA’s Rentwise and HCV data showed a correlation between graduation from RentWise and a reduction in the likelihood of being evicted. The city’s four-year eviction rate average for all renters was 2.3%. For individuals who had graduated from RentWise it was 1.0%. For individuals who were both RentWise graduates and a Housing Choice Voucher holder, the four-year average was 0.7%.

**HUD STANDARD METRICS**

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>CE #4 Increase in Resources Leveraged</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Amount of funds leveraged in dollars (increase)	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #7 RentWise Tenant Education</b>				
Leveraged funds are calculated from in-kind contributions of meeting space at \$240 per RentWise session and in-kind contributions of trainers from other human services agencies at \$27.14 per hour and 12 hours per session times the number of sessions.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Amount of Funds Leveraged	\$0	In kind meeting space at \$240 per session and in kind trainers @ \$27.14 per hour—12 hours per session and 24 sessions per year \$13,584	In kind meeting space at \$240 per session @ 30 sessions = \$7,200  In kind trainers @ \$27.14 per hour—12 hours= \$325.68 per session @ 30 sessions= \$9,770.40 per year  TOTAL = \$16,970.40	Yes

<b>HC #7 Households Assisted by Services that Increase Housing Choice</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>

Number of households receiving services aimed to increase housing choice (increase)	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number)	Actual number of households receiving these services after implementation of the activity (number)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #7 RentWise Tenant Education</b>				
The data for this metric is the number of RentWise registrants who participate in one or more training sessions.				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved
Number of Households participating in RentWise	0	500	209	No – Class enrollment was decreased to allow for social distancing.

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

<b>Other Initiatives #7 RentWise Tenant Education</b>		
Data for this initiative is number of households who register, attend, and complete RentWise.		
	Registered in RentWise Database	RentWise Graduates
Partial Year 8-2008 to 3-2009)	130	65
FY 2010	988	390
FY 2011	1,272	555
FY 2012	1,393	580
FY 2013	1,178	594
FY 2014	857	423
FY 2015	1,337	675
FY 2016	1,383	758
FY 2017	1,496	691
FY 2018	1,160	707
FY 2019	827	553
FY 2020	1065	376
FY 2021	0	0
FY2022	399	180
Totals FY 2010 to 2022	13,485	6,547
Average FY 2010 to 2022	1.037	504
RentWise Graduates as a percent of Registrations		48.6%

**Other Initiatives #7 RentWise Tenant Education**

MTW funds are used in this initiative to fund certain costs of RentWise---language interpretation, postage, brochures and printing manuals. The benchmark is revised annually through the LHA budget.

<b>Unit of Measurement</b>	<b>Baseline = Budget</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Cost of RentWise Program is within the Budget				
Interpretation	\$8,200	\$9,500	\$5,864.88	Yes
Brochures	\$400	\$500	\$90.00	Yes
Postage	\$2,000	\$2,100	\$682.69	Yes
Training Manuals	\$3,200	\$3,200	\$0	Yes
<b>TOTAL COST of RENTWISE PROGRAM</b>	<b>\$13,800</b>	<b>\$15,300</b>	<b>\$6,637.57</b>	<b>Yes</b>

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 8**

### **ACTIVITY: RESIDENT SERVICES PROGRAM**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program  
Plan Year Proposed: November, 2010  
Plan Year Approved: FY 2012  
Plan Year Implemented: October 1, 2011  
Statutory Objectives: Increase housing choice for low income families

#### **ii. DESCRIPTION/IMPACT/UPDATE**

The resident services program provides outreach, case management, service coordination, and supportive services to tenants who are frail elderly or disabled and residing at Crossroads House apartments. Through an interlocal agreement, the program is operated by the Lincoln Area Agency on Aging (LAAA). This activity serves only households under 80% AMI and is related to the MTW objective of increasing housing choices for low-income families by providing a supportive services program which will allow residents to remain independent and prevent premature or unnecessary placement in assisted living facilities or nursing homes.

The resident services program is modeled after HUD's Congregate Housing Services Program which LAAA (grantee) currently offers at LHA's Burke Plaza (91 units) and Mahoney Manor (120 units). All residents are eligible for outreach, case management and service coordination. Residents who are frail with 3 or more deficits in Activities of Daily Living (ADLs) or who are disabled are eligible for supportive services which include personal care, housekeeping, and transportation subsidy. Participation in services by residents is not mandatory and is at the option of the resident. Individual supportive services under the contract are limited by an amount established annually.

A Professional Assessment Committee (PAC) reviews an assessment of each potential participant in supportive services to ensure each participant is an elderly person deficient in at least three ADLs or is a disabled individual.

A service coordinator provides general case management and referral services to all potential participants in the program and provides referrals to the PAC of those individuals who appear eligible for the program. The service coordinator educates residents about the services available and application procedures, assists in applications, and monitors ongoing services. The service coordinator also coordinates the delivery of third party purchased supportive services for residents who are ineligible for the program supportive services in order to establish a continuum of care and assures access to necessary supportive services.

The LAAA contracts with qualified providers to furnish participants with supportive services including personal care, transportation, and housekeeping services. These three services are provided and funded as part of the program. MTW funds are used to provide reimbursement to LAAA under the interlocal agreement.

Personnel costs for the service coordinator are reimbursed at 100% for .35 FTE to serve Crossroads House. Supportive services are reimbursed at 75% with the remaining 25% billed to the participant receiving services. There is an annual limitation on individual supportive services to the program with an initial cap set at \$2,000 and adjusted annually as needed.

The resident services program is enhanced by the location of the downtown senior center located directly across the street from Crossroads House. This location affords easy access to the programs operated by the LAAA at the senior center which include education, recreation, social activities, health activities, and nutritional programs including a daily noon meal. This location also affords easy access to the service coordinator office and program administration, also located at the senior center site.

#### IMPACT AND OUTCOME

LHA continued this initiative in the past year through an interlocal agreement with Lincoln Area Agency on Aging. Outreach was provided to all residents with 58 residents receiving ongoing service coordination in the program. During the 12 month period, there were 74 tenants living at Crossroads House and 49 who were frail, elderly or disabled. There were 16 individuals who were at high risk for a higher level of service but were able to continue in independent living with supportive services. Sixty-seven (67) residents received case management services and fifteen (15) individuals received one or more of the supportive services with MTW funding. This results in substantial savings of Medicaid dollars to remain in independent living versus assisted living or nursing home care.

Through service coordination, 39 residents also received assistance with services not funded under this program. The service coordinator spends considerable time explaining services and benefits to residents and families and communicating and problem solving with service agencies, physicians, and other health care providers and building managers. New problem situations arise

regularly and they are addressed quickly. The service coordinator works with residents who are hospitalized or have temporary nursing home stays that require a plan with supportive services for when they return home.

The services increase housing choice by providing the choice to continue to live in an independent apartment and age in place. Typically, when individuals become more frail or disabled, they require a higher level of care and individuals often have little or no choice but to move to whatever assisted living or nursing home is available. With in-home support services, individuals are able to choose to continue to live independently. Low income applicants are attracted to this type of housing because it gives them the choice to continue to live independently because an array of services will be available as their needs change.

The services are cost effective by helping maintain individuals in their home and prevent unnecessary higher levels of care at substantial additional cost. Generally, the cost of higher levels of care is paid with Medicaid funds as the Crossroads House tenants do not have income, assets or insurance to cover the cost.

HUD STANDARD METRICS

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>HC #7 Households Assisted by Services that Increase Housing Choice</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving services aimed to increase housing choice (increase)	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number)	Actual number of households receiving these services after implementation of the activity (number)	Whether the outcome meets or exceeds the benchmark
<b>Other Initiatives #8 Resident Services Program</b>				
The Lincoln Housing Authority has an interlocal agreement with the Lincoln Area Agency on Aging (LAAA) to provide frail or disabled tenants. By providing these services, LHA is able to increase housing choice for tenants and prospective tenants.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households receiving services	0	35	67	Yes

**ADDITIONAL LOCAL METRICS**

Local metrics are provided to give additional view of the impact of the initiative. In most, but not all cases, the local metric follows the format prescribed by HUD’s Standard metrics.

<b>Other Initiatives #8 Resident Services Program</b>				
Through the interlocal agreement, Lincoln Housing Authority established limits on the overall cost of the program. The limit is the benchmark which may be revised annually during contract renewal. The benchmark is revised annually.				
<b>Unit of Measurement</b>	<b>Contract Amount = Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Cost of Resident Services Program	\$41,884	Less than or equal to \$41,884	\$ 38,517	Yes

<b>Other Initiatives #8 Resident Services Program</b>				
Lincoln Area Agency on Aging provides a conservative estimate of the Medicaid cost if services were provided at the next level of care. The estimate is based on Medicaid Waiver Assisted Living costs although some individuals may not be suitable or able to find assisted living and would be forced to a skilled nursing care facility at substantial additional cost. The estimate is individualized and adjusted to the length of time the individual would have been in a higher level of care as well as the residents’ actual incomes which would be used to cover part of the cost in assisted living at the Medicaid rate.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Estimated Medicaid cost savings by avoiding the next higher level of care (assisted living)	\$135,501	>\$135,000	\$272,719	Yes

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

## **Initiative 9**

### **ACTIVITY: LANDLORD INCENTIVE HAP**

#### **i. PLAN YEAR APPROVED, IMPLEMENTED, AMENDED**

Program Affected: HCV Program  
Plan Year Proposed: FY 2015  
Plan Year Approved: FY 2015  
Plan Year Implemented: April 1, 2015  
Statutory Objective: Increase housing choice for low income families

#### **ii. DESCRIPTION/IMPACT/UPDATE**

As an incentive for landlords to participate in the MTW tenant-based voucher program, Lincoln Housing Authority will provide the landlord a one-time additional Housing Assistance Payment (HAP) of \$200 upon the execution of the HAP contract for the new unit and tenant. This HAP payment will be included with all other HAP reported in VMS. The landlord is not eligible for \$200 additional HAP payment if the contract is executed for a transfer in units with the same landlord, or if the contract is executed due to a lease renewal or change. The following properties are also excluded from the additional landlord incentive payment of \$200: 1) properties managed or owned by Lincoln Housing Authority, or 2) properties receiving Low Income Housing Tax Credits.

This initiative came from discussions with our Landlord Advisory Committee who identified some of the following burden factors to participating in the voucher program: 1) the HAP contract creates additional paperwork and time, 2) inspection requirements result in repairs to units not otherwise required for a market-rate tenant, 3) landlords take time out of their business schedule to meet with inspectors for HQS inspections, 4) landlords must wait for their first rental payment until after inspections and contracts are approved rather than on the day the lease is signed, and 5) landlords lose rental revenue while waiting for units to pass inspections. This initiative creates an incentive that recognizes these barriers and compensates the landlords accordingly.

The Landlord Incentive was increased to \$200 with the approval of the FY21 MTW Plan.



## IMPACT AND OUTCOME

A goal of this initiative was to maintain or increase the number of landlords participating in the voucher program. Given the tight rental market in Lincoln, landlord participation has been decreasing which has made it more difficult for voucher holders to obtain affordable housing. Additional goals were to increase the success rate for vouchers issued and shorten the time it takes to lease a voucher. Prior to the implementation of the Landlord HAP Incentive, 60% of the vouchers issued were leased. Current data shows 72.8% of the vouchers issued were leased. Since the implementation of the Landlord incentive, the voucher success rate improved by 12.8 percentage points. The improvements with the voucher leasing success rate are quite impressive considering the Lincoln rental market continues to be a very tight rental market. If this incentive had not been implemented, it is quite possible the success rates would have decreased because many landlords use stricter selection criteria when the rental market experiences low vacancy rates.

Another goal was to improve landlord participation in the voucher program. Lincoln continues to experience a tight rental market and it is difficult to retain current landlords and recruit new landlords. The goal to maintain or increase the number of landlords participating in the voucher program initially was achieved increasing the number of landlords actively participating in the voucher program from 747 in October 2014. In recent years we've seen an overall decline in the number of landlords, although from March of 2021 to March of 2022 we stabilized and slightly increased from 683 to 689 landlords. This may reflect consolidation of ownership and/or management companies rather than decreased property participation.

Twenty-three (23) new landlords were added to the program from April 2021 to March 2022 and received the landlord incentive. Another 10 landlords who received the landlord incentive reinstated their participation with the program after an absence of participation for over a year. Altogether, 335 landlords received the incentive for a total of 410 units.

**HUD STANDARD METRICS**

For this initiative, LHA is using the following standard metrics from Form 50900:

<b>HC #5 Increase in Resident Mobility</b>				
<b>HUD instructions for this metric are shown in the following two rows:</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of this activity (increase)	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number) This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
<b>Other Initiatives #9 Landlord Incentive HAP</b>				
The number of households able to move to a better unit and/or neighborhood of opportunity is reflected in the number of times the HAP incentive is paid to a landlord---this incorporates the assumption that transfers and new admissions result in a better unit or neighborhood of opportunity.				
This benchmark was revised in the 2016-2017 plan after considering the number of moves into tax credit and LHA properties which are not eligible for the landlord incentive.				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of this activity (increase)	0 units	240 units	410 units	Yes

**iii. ACTUAL NON-SIGNIFICANT CHANGES TO ACTIVITY**

None

**iv. ACTUAL CHANGES TO METRICS/DATA COLLECTION**

None

**v. ACTUAL SIGNIFICANT CHANGES TO ACTIVITY**

None

**vi. CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES**

None

**B: NOT YET IMPLEMENTED**

All approved activities have been implemented.

**C: ON HOLD**

All approved activities have been implemented.

**D: CLOSED OUT**

No approved activities have been closed out.

## **V. Sources and Uses of MTW Funds**

### **A. Financial Reporting**

#### **i. Available MTW Funds in the Plan Year**

The unaudited information will be submitted in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System. The audited information is due within 9 months of the end of the fiscal year and will be submitted accordingly.

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

The unaudited information will be submitted in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System. The audited information is due within 9 months of the end of the fiscal year and will be submitted accordingly.

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

Activities using the broader uses of funds authority are reported in Section IV: Approved MTW Activities. These include:

Initiative 7     RentWise Tenant Education

Initiative 8     Resident Services Program

### **B. LOCAL ASSET MANAGEMENT PLAN**

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

YES

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

NO

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

NO

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

NOT APPLICABLE

## **VI. Administrative**

**A. General description of any HUD reviews, audits or physical inspection issues that require the agency to take action to address the issue;**

There were no HUD reviews, audits or physical inspection issues that required agency action during the fiscal year.

**B. Evaluation results**

None---Not Applicable

**C. MTW Statutory Certification Requirement**

Appendix A

**D. MTW Energy Performance Contract (EPC) Flexibility Data**

Not applicable

**E. LHA Request and HUD Approval Letters Regarding VASH and EHV under MTW**

Appendix B

**F. Request for Inspection and Unit Information Form**

Appendix C

# **APPENDIX A**

## **Agency Certification for the Statutory Requirements**

HOUSING AUTHORITY  
OF THE  
CITY OF LINCOLN, NEBRASKA

**RESOLUTION NO. 971**

CERTIFICATION OF COMPLIANCE WITH  
HUD MOVING TO WORK STATUTORY REQUIREMENTS

WHEREAS, the Housing Authority of the City of Lincoln, Nebraska was selected by the U.S. Department of Housing and Urban Development to participate in the Moving To Work Demonstration program; and

WHEREAS, the Housing Authority of the City of Lincoln, Nebraska has entered into a written agreement with the U.S. Department of Housing and Urban Development outlining our participation requirements and approved MTW initiatives; and

WHEREAS, the written agreement with HUD requires that the Housing Authority of the City of Lincoln meet the following MTW statutory requirements:

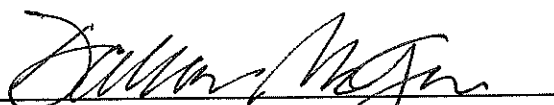
- 1) assuring that at least 75 percent of the families assisted are very low-income families;
- 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration; and

WHEREAS, the Housing Authority of the City of Lincoln must certify to HUD through the MTW Annual Report that LHA has met the statutory requirements for the MTW Plan ending March 31, 2022;

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Housing Authority of the City of Lincoln that LHA has met all statutory requirements outlined in the written Moving To Work agreement with HUD; and

BE IT FURTHER RESOLVED that the Executive Director is hereby authorized to execute any and all documents submitting this approved certification resolution to HUD.

Dated this 19th day of May, 2022.

  
Dallas McGee, Chair

ATTEST:

  
Chris Lamberty, Secretary

## **APPENDIX B**

**LHA Request and HUD Approval Letters**

**Regarding**

**VASH and EHV**

**under MTW**



Commissioners:  
Orville Jones, III, Chair  
Dallas McGee, Vice Chair  
Jan Gauger  
Georgia Glass  
Joy Ward



Executive Director  
Larry G. Potralz

P.O. Box 5327 • 5700 R Street • Lincoln, Nebraska 68505

September 8, 2011

Milan Ozdinec, Deputy Assistant Secretary  
U.S. Department of Housing and Urban Development  
Office of Public Housing and Voucher programs  
451 7<sup>th</sup> Street, SW  
Washington, DC 20410

SUBJECT: MTW flexibility for VASH participants

Dear Mr. Ozdinec:

The Housing Authority of Lincoln, Nebraska is proposing to operate the HUD Veterans Affairs Supportive Housing (VASH) program in accordance with our approved Moving to Work (MTW) standard agreement. Based on the success of our MTW policies, we would like to expand them to VASH participants.

The following table is a summary of LHA's MTW initiatives for the voucher program, along with our assessment as to whether or not the veteran would benefit from the MTW policy and if the policy has a conflict with VASH program policies.

MTW Initiative	VASH appropriate	In conflict with VASH policies
1. Coincide inspection due dates with annual re-exam dates. Biennial inspections for units that pass HQS at first inspection visit.	Veterans and VA case managers would benefit through the reduction in administrative work. It is easier to case manage when the inspections and annual re-examination dates coincide. Veterans and their landlords should be rewarded for maintaining their units to meet HQS standards.	
2. Biennial re-examinations for elderly and disabled	Veterans and VA case managers would benefit by the reduced administrative work and redundancy of meeting with PHA worker. Most VASH households are disabled thus this policy would reduce the veteran's PHA office visits to one in a two year period.	

Telephone: (402) 434-5500

Fax: (402) 434-5502

(TDD) Telecommunication Device for Deaf: 1-800-545-1833 Ext. 875

Email: Info@L-Housing.com

www.L-Housing.com

3.	Asset Income and verifications- self-certification for assets under \$5,000 and assets over \$5,000 calculated at 2% of the face value	Veteran would benefit from the reduced verification standards as eligibility decisions could be completed faster.	
4.	Verifications- Accepting the last issued Social Security statement rather than requiring statement to be issued within 60 days.	Veteran would benefit from the reduced verification standards as eligibility decisions could be completed faster.	
5.	Earned Income Disregard, imputed welfare income and student earned income exclusions.	Veteran households tend to not be impacted by these policies.	
6.	Standard utility allowance designated by bedroom size only. No utility reimbursements issued.	Veterans and VA case managers would benefit from the policy simplification by understanding how to locate more affordable units. Tenant rent portions would reduce for some veterans, specifically for those who reside in units where utilities are included in the rent.	
7.	TTP calculated at 27% of gross income	Veteran would benefit as this would reduce the TTP of all current veteran households.	
8.	Maximum initial rent can not exceed 50% of monthly adjusted income.	Veterans would benefit through more housing choice opportunities.	
9.	90 day delay in interims for reducing employment income without good cause.		Exempt VASH participant from the policy as they are working in a self sufficiency program with the VA case manager.
10.	Income targeting will not be used in new admissions.		Not applicable- VA referrals controls the new admissions selection.
11.	Restricted Portability		Not applicable- VASH has it's own set of portability restrictions.

12.	Minimum Rent of \$25		Exempt- Veteran would be eligible for the hardship clause.
13.	Minimum Earned Income- work requirement of 25 hours per week @ minimum wage for adults who do not qualify for exemption.		Exempt VASH participant from the policy as they are working in self sufficiency program with VA case manager.

As noted in the table above, most of the initiatives would not conflict with the regulations or the intentions of the VASH program. Rather, these MTW initiatives would actually make the program administration more efficient for our agency and the Veteran's Affairs (VA) plus benefit the veteran served by the Lincoln Housing Authority (LHA). LHA has reviewed the above policy changes with the VA case manager and Program Coordinator who also support the proposed policy changes.

LHA is also requesting to submit all HUD-VASH participant 50058 records via the MTW-50058 to ensure all 50058 records are accepted and recorded properly in the PIH information Center (PIC) system.

We want to assure your office that LHA would at all times follow any and all applicable rules that are specific to the VASH program such as administering the program in accordance with HUD-VASH operating requirements, maintaining separate tracking of all HUD-VASH funds, using special program codes in the PIC system and continuing to report HUD-VASH separately from MTW vouchers. If you have any questions about this proposal please feel free to contact Seanna Collins, Tenant Based Housing Manager at (402) 434-5505 or [seanna@l-housing.com](mailto:seanna@l-housing.com).

Thank you for considering our request. We look forward to hearing back from you so we may start implementing these activities for our veterans as soon as possible.

Sincerely,



Larry G. Potratz  
Executive Director

.cc Emily Cadik, MTW HUD Coordinator  
Michael Dennis, HUD Headquarters  
Laure Rawson, HUD Headquarters  
Phyllis Smelkinson, HUD Headquarters



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

ASSISTANT SECRETARY FOR  
PUBLIC AND INDIAN HOUSING

September 21, 2011

Mr. Larry G. Potratz  
Executive Director  
Lincoln Housing Authority  
P. O. Box 5327  
5700 R Street  
Lincoln, NE 68505

Dear Mr. Potratz:

On September 8, 2011, you submitted a request on behalf of the Lincoln Housing Authority (LHA) to establish alternative requirements to Section i. of the *Implementation of the HUD-VA Supportive Housing Program (Operating Requirements)* published in the Federal Register on May 6, 2008. This request included all Moving to Work (MTW) provisions that apply to the voucher program.

Section i. of the Operating Requirements states that HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers must be administered in accordance with the Operating Requirements and are not eligible for fungibility under MTW agreements. Also, HUD-VASH vouchers must be reported on separately from vouchers under the agency's MTW Agreement.

Specifically, LHA requested to operate its 60 HUD-VASH vouchers in accordance with all applicable provisions of its MTW Agreement. LHA believes that administering all HUD-VASH vouchers in accordance with its MTW Agreement would simplify administration of the program and benefit the veterans.

In reviewing LHA's request, the standard applied is a straightforward one: HUD-VASH assistance must always be administered in accordance with the Operating Requirements, the statutory provisions governing this assistance (in particular, the requirements contained in the applicable Appropriations Act), and any other HUD-VASH voucher requirements (i.e., any supplemental requirements that are established in addition to those stated in the Operating Requirements). If a MTW Agreement provision is inconsistent with the HUD-VASH requirements, the latter requirements prevail with respect to administration of these vouchers.

LHA completed an assessment of 13 MTW initiatives that would be applied to the HUD-VASH voucher program. The Department agrees with LHA's assessment that the initiative would either benefit the veteran or not be applied. Therefore, it has been concluded that LHA's MTW initiatives do not conflict with the HUD-VASH voucher requirements (particularly those involving eligibility, admission and continued assistance for HUD-VASH veterans). Given this determination, and the fact that it should have no adverse impact on HUD-VASH families since hardship exemptions are provided, LHA may administer HUD-VASH vouchers under the MTW voucher provisions.

The approval to allow LHA to administer its HUD-VASH vouchers in accordance with its MTW Agreement does not extend to HUD-VASH program funding. HUD-VASH voucher funding is not eligible for fungibility and the funds must be accounted for separately in the Voucher Management System (VMS).

Please note that in accordance with Sections II.i. and III of the Operating Requirements, MTW agencies are required to use the regular form HUD-50058 for HUD-VASH families when reporting into the Public and Indian Housing Information Center (PIC), not the form HUD-50058 MTW. At your request, since LHA will be operating its HUD-VASH program in accordance with its MTW Agreement, LHA may report these families on the form HUD-50058 MTW since the rent calculations would be rejected on the regular form HUD-50058.

Your HUD-VASH program will be monitored through PIC reporting, VMS and information provided by the Department of Veterans Affairs. HUD reserves the right to withdraw or modify this approval at any time if, in HUD's determination, the MTW alternative requirements are having a negative impact on the veterans receiving assistance under the HUD-VASH program.

Should you wish to discuss this matter further, please contact Phyllis Smelkinson, Housing Program Specialist, Housing Voucher Management and Operations Division, at (202) 402-4138.

Sincerely,

*For Deborah Hernandez*  
Sandra B. Henriquez  
Assistant Secretary



P.O. Box 5327 • 5700 R Street • Lincoln, Nebraska 68505

June 22, 2015

Milan Ozdinec, Deputy Assistant Secretary  
U.S. Department of Housing and Urban Development  
Office of Public Housing and Voucher programs  
451 Seventh (7<sup>th</sup>) Street, SW  
Washington, DC 20410

SUBJECT: MTW flexibility for VASH participants

Dear Mr. Ozdinec:

The Housing Authority of Lincoln, Nebraska was previously approved on September 21, 2011 to administer eight (8) of the thirteen (13) Moving to Work (MTW) local initiatives within the HUD-VASH program. Enclosed is a copy of our previous request and HUD's approval to operate MTW initiatives within the HUD-VASH program.

As of July 1, 2015 a new MTW initiative called the "Landlord Incentive HAP" will be implemented encouraging landlords to participate with the tenant-based voucher program. The city of Lincoln is experiencing a very tight rental market with limited availability of affordable housing, therefore voucher holders are having a difficult time finding available units and landlords who will participate in the voucher program. The Veteran Affairs staff for the HUD-VASH program repeatedly report that it is very difficult to find affordable housing in Lincoln and even more difficult to find landlords who are interested in participating in an administratively burdensome program. Landlords report working with the Section 8 Housing Choice Voucher program increases their costs of doing business due to the program's additional inspection, lease, and HAP contract requirements. These requirements are additional expenses not incurred when renting to a market renter, therefore discourages landlords from renting to voucher participants.

The "Landlord Incentive HAP" initiative will reimburse the landlord for a portion of the additional business expenses created by the tenant-based voucher program through a one-time additional HAP payment of \$150 when a new HAP contract is executed with LHA. We would like to expand this incentive to landlords who will execute HAP contracts with LHA for HUD-VASH participants.

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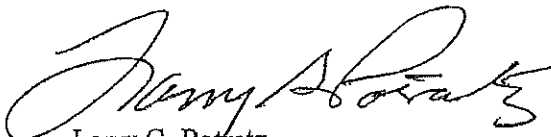
MTW initiative	VASH Appropriate
<p>Provide landlords with a one-time additional HAP payment of \$150 upon the execution of the HAP contract for a new unit and tenant. Tax Credit properties and properties owned or managed by a PHA are excluded from this incentive payment.</p>	<p>Veteran and VA case managers would benefit with more housing choice opportunities by offering an incentive to landlords who are willing to participate with the HUD-VASH program. The additional HAP costs to the VASH program would be \$150 @ 44 estimated new admissions= \$6,600 during the next 12 months.</p>

As noted in the table above the initiative would not conflict with the regulation or intentions of the HUD-VASH program. LHA has reviewed the above policy change with the VA case manager and VA Supervisor who also supports the proposed policy change.

We want to assure your office that LHA would at all times follow any and all applicable rules that are specific to the VASH program such as administering the program in accordance to HUD-VASH operating requirements, maintaining and tracking all HUD-VASH funds separately, using special program codes in the PIC system and continuing to report HUD-VASH separately in VMS. If you have any questions about this proposal, please contact Seanna Collins, Tenant-based Housing Manager at (402) 434-5505 or [seanna@l-housing.com](mailto:seanna@l-housing.com).

Thanks you for considering our request. We look forward to hearing back from you so we may starting implementing this activity for our veterans as soon as possible.

Sincerely,



Larry G. Potratz  
Executive Director

enclosures

.cc Alison Smith, MTW HUD Coordinator  
Laurel Davis, Acting MTW Director  
Denise Gipson, HUD Field Office Director of Public Housing  
Julie Steadman, HUD Field Office Public Housing Revitalization Specialist



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

RECEIVED  
LINCOLN HOUSING AUTHORITY

OFFICE OF PUBLIC AND INDIAN HOUSING

JUL 17 2015

15 JUL 23 AM 10:38

Mr. Larry G. Potratz  
Executive Director  
Lincoln Housing Authority  
P. O. Box 5327  
Lincoln, NE 68505-2332

Dear Mr. Potratz:

On June 22, 2015, you submitted a request on behalf of the Lincoln Housing Authority (LHA-NE002) to waive certain requirements under the Housing Choice Voucher (HCV) program so that the HUD-Veterans Affairs Supportive Housing (VASH) program could comport with the LHA's Moving to Work (MTW) Agreement. Section II (*Special Rules for the HUD-VASH Voucher Program*) of the *Implementation of the HUD-VASH Program* (Operating Requirements) published in the Federal Register on March 23, 2012, allows for alternative requirements necessary for the effective delivery and administration of these vouchers. Section II.j. (*MTW Agencies*) states that HUD-VASH vouchers must be administered in accordance with the Operating Requirements and are not eligible for fungibility under a public housing agency's MTW Agreement.

In reviewing your request, the standard applied is a straightforward one: HUD-VASH assistance must always be administered in accordance with the Operating Requirements, the statutory provisions governing this assistance (in particular, the requirements contained in the applicable Appropriations Act), and any other HUD-VASH voucher requirements (i.e., any supplemental requirements that are established in addition to those stated in the Operating Requirements). If a MTW Agreement provision is inconsistent with the HUD-VASH requirements, the latter requirements prevail with respect to administration of these vouchers.

By way of background, on September 21, 2011, the Department approved 13 MTW initiatives for the LHA's HUD-VASH program. The LHA requested to add a new MTW provision that was approved and effective July 1, 2015. This initiative is called the "Landlord Incentive Housing Assistance Payment (HAP)." Through this initiative, the LHA will reimburse a new landlord for a portion of the additional business expenses created by the HCV program through a one-time additional HAP of \$150 when a new HAP contract is executed with the LHA.

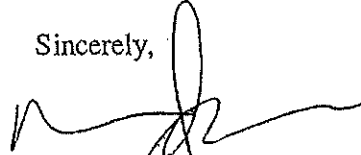
In reviewing this request, HUD has determined that this approved MTW provision does not conflict with the HUD-VASH voucher requirements (particularly those involving eligibility, admission and continued assistance for HUD-VASH veterans). Therefore, the LHA may apply this provision of its MTW agreement.



Your HUD-VASH program will be monitored through PIC reporting, VMS and information provided by the Department of Veterans Affairs. HUD reserves the right to withdraw or modify this approval at any time if, in HUD's determination, the MTW alternative requirements are having a negative impact on the veterans receiving assistance under the HUD-VASH program.

Should you wish to discuss this matter further, please contact Phyllis Smelkinson, Housing Program Specialist, Housing Voucher Management and Operations Division, at (202) 402-4138 or by email at [Phyllis.A.Smelkinson@hud.gov](mailto:Phyllis.A.Smelkinson@hud.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Milan M. Ozdinec', written over the printed name below.

Milan M. Ozdinec  
Deputy Assistant Secretary  
for Public and Indian Housing



# Lincoln Housing Authority

Equal Housing Opportunity

P.O. Box 5327 • 5700 R Street • Lincoln, Nebraska 68505

June 12, 2017

Milan Ozdinec, Deputy Assistant Secretary  
 U.S. Department of Housing and Urban Development  
 Office of Public Housing and Voucher programs  
 451 Seventh (7<sup>th</sup>) Street, SW  
 Washington, DC 20410

**SUBJECT:** MTW flexibility for VASH participants

Dear Mr. Ozdinec:

The Housing Authority of Lincoln, Nebraska was previously approved to administer nine (9) of the fourteen (14) Moving to Work (MTW) local initiatives within the HUD-VASH program. Enclosed is a copy of our previous requests and HUD's approvals on September 21, 2011 and July 17, 2015 to operate these MTW initiatives within the HUD-VASH program.

Construction completion on an apartment complex for homeless veterans is anticipated for November 2017. Once the apartments are constructed and ready for occupancy, Lincoln Housing Authority will be administering HUD-VASH project-based voucher's (PBV) at these apartments. We would like to apply a couple MTW PBV initiatives to the HUD-VASH PBV program to give these veterans the same benefits as our Moving to Work PBV participants.

MTW initiative	VASH Appropriate
<p>Allow the use of the MTW standard utility allowance by bedroom size regardless of tenant or owner utility responsibility in the tenant rent portion calculation for HUD-VASH project-based vouchers.</p>	<p>The veteran would benefit by paying a lower portion of their household income towards tenant rent. This keeps the tenant-based voucher and project-based voucher tenant rent calculations reasonably the same. Therefore providing a smoother transition for any veterans transferring from the tenant-based voucher to a project-based voucher program.</p>

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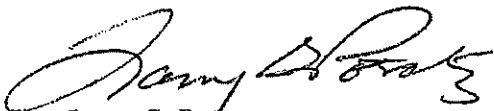
<p>Allow the owner to maintain a site-based waiting list for the HUD-VASH PBV property.</p>	<p>The veteran would benefit by quicker tenant selection and a more efficient application process. This initiative was approved under the Housing Opportunity Through Modernization Act of 2016 (HOTMA) without the need of a MTW approval, but HUD has not yet released the policy to implement this initiative.</p>
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Neither of these initiatives would conflict with the regulation or intentions of the HUD-VASH program. LHA has reviewed the above policy change with the VA Supervisor who also supports the proposed policy change.

We want to assure your office that LHA would at all times follow any and all applicable rules that are specific to the VASH program such as administering the program in accordance to HUD-VASH operating requirements, maintaining and tracking all HUD-VASH funds separately, using special program codes in the PIC system, and continuing to report HUD-VASH HAP separately in VMS. If you have any questions about this proposal, please contact Seanna Collins, Tenant-based Housing Manager at (402) 434-5505 or [seanna@l-housing.com](mailto:seanna@l-housing.com).

Thanks you for considering our request. We look forward to hearing back from you so we may starting implementing these activity for our veterans as soon as the project-based voucher property is available.

Sincerely,



Larry G. Potratz  
Executive Director

enclosures

- .cc Christopher Golden, MTW HUD Coordinator
- Marianne Nazzro, MTW Director
- Denise Gipson, HUD Field Office Director of Public Housing
- Julie Steadman, HUD Field Office Public Housing Revitalization Specialist



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

JUL 06 2017

OFFICE OF PUBLIC AND INDIAN HOUSING

Mr. Larry G. Potratz  
Executive Director  
Lincoln Housing Authority  
P. O. Box 5327  
Lincoln, NE 68505-2332

Dear Mr. Potratz:

On June 12, 2017, you submitted a request on behalf of the Lincoln Housing Authority (LHA-NE002) to waive certain requirements under the Housing Choice Voucher (HCV) program so that the HUD-Veterans Affairs Supportive Housing (VASH) program could comport with the LHA's Moving to Work (MTW) Agreement. Section II (*Special Rules for the HUD-VASH Voucher Program*) of the *Implementation of the HUD-VASH Program* (Operating Requirements) published in the Federal Register on March 23, 2012, allows for alternative requirements necessary for the effective delivery and administration of these vouchers. Section II.j. (*MTW Agencies*) states that HUD-VASH vouchers must be administered in accordance with the Operating Requirements and are not eligible for fungibility under a public housing agency's MTW Agreement.

In reviewing this request, the standard applied is a straightforward one: HUD-VASH assistance must always be administered in accordance with the Operating Requirements, the statutory provisions governing this assistance (in particular, the requirements contained in the applicable Appropriations Act), and any other HUD-VASH voucher requirements (i.e., any supplemental requirements that are established in addition to those stated in the Operating Requirements). If a MTW Agreement provision is inconsistent with the HUD-VASH requirements, the latter requirements prevail with respect to administration of these vouchers.

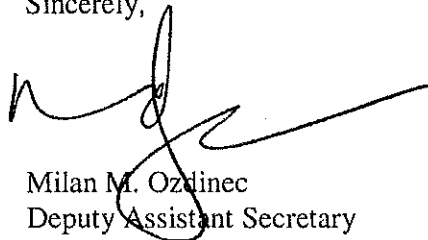
By way of background, on September 21, 2011, the Department approved 13 MTW initiatives for the LHA's HUD-VASH program. The LHA requested to add a new MTW provision that was approved and effective July 1, 2015. This initiative is called the "Landlord Incentive Housing Assistance Payment (HAP)." Through this initiative, the LHA will reimburse a new landlord for a portion of the additional business expenses created by the HCV program through a one-time additional HAP of \$150 when a new HAP contract is executed with the LHA.

In reviewing this request, HUD has determined that this approved MTW provision does not conflict with the HUD-VASH voucher requirements (particularly those involving eligibility, admission and continued assistance for HUD-VASH veterans). Therefore, the LHA may apply this provision of its MTW agreement.

Your HUD-VASH program will be monitored through PIC reporting, VMS and information provided by the Department of Veterans Affairs. HUD reserves the right to withdraw or modify this approval at any time if, in HUD's determination, the MTW alternative requirements are having a negative impact on the veterans receiving assistance under the HUD-VASH program.

Should you wish to discuss this matter further, please contact Phyllis Smelkinson, Housing Program Specialist, Housing Voucher Management and Operations Division, at (202) 402-4138 or by email at [Phyllis.A.Smelkinson@hud.gov](mailto:Phyllis.A.Smelkinson@hud.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Ozdinec', with a long horizontal flourish extending to the right.

Milan M. Ozdinec  
Deputy Assistant Secretary  
for Public and Indian Housing

---



P.O. Box 5327 • 5700 R Street • Lincoln, Nebraska 68505

June 8, 2021

Denise Gipson  
Director, Office of Public Housing  
Office of Field Operations  
U.S. Department of Housing and Urban Development  
Edward Zorinsky Federal Building  
1616 Capitol Avenue, Suite 329  
Omaha, Nebraska 68102-4908

Subject: MTW flexibility for EHV Program

Dear Ms. Gipson:

The Housing Authority of the City of Lincoln, Nebraska (LHA) is proposing to administer the HUD Emergency Housing Voucher (EHV) Program in accordance with the flexibilities in our approved Moving To Work (MTW) Annual Plan. According to PIH Notice 2021-15, we are requesting approval from the HUD Office of Housing Voucher Programs through the local Field Office. We are also copying the HUD MTW Office in this request.

LHA has been operating as a MTW agency since 1999. We have a particular program design, including a rent structure, inspection requirements and annual/biennial review requirements that apply to all Housing Choice Vouchers, VASH Vouchers and Mainstream Vouchers. We have close working relationships with the homeless service providers and other Continuum of Care agencies in Lincoln and are already working closely in the implementation of this new program.

Our service partners and community landlords are familiar with our existing rent and inspection rules. It would be an extreme burden on LHA, our partners and our participants to create a program with completely different rent and inspection requirements than all other vouchers in the community. Implementation of the EHV program will be more efficient and successful if it matches the existing MTW program flexibilities. It is critically important that all six rent-related initiatives and both inspection initiatives are applied to the EHV Program.

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Email: [Info@L-Housing.com](mailto:Info@L-Housing.com)

[www.L-Housing.com](http://www.L-Housing.com)

The following are the initiatives in our approved MTW Annual Plan. We are specifically requesting to apply the MTW flexibilities encompassed by Rent Reform Initiatives 1 through 6, and Other Initiatives 1, 2, 4 and 5 to the EHV Program. We understand that MTW funding flexibility is not part of the EHV Program.

MTW Initiative	Description	EHV Appropriate
<b>Rent Reform Initiative 1</b>	<b>Interim Re-Examinations.</b> Provides incentives to seek re-employment and increase income between re-examinations.	It does not conflict with EHV requirements and is part of our overall rent and recertification structure.
<b>Rent Reform Initiative 2</b>	<b>Minimum Earned Income.</b> Provides incentive to seek earned income from work	It does not conflict with EHV requirements. It is anticipated that most EHV participants will be disabled and not eligible for Minimum Earned Income, or be exempt due to their service plans, but some may qualify.
<b>Rent Reform Initiative 3</b>	<b>Rent Calculations.</b> This is the base model for calculating Total Tenant Payment, including using 27% of monthly income and a minimum rent of \$25	It does not conflict with EHV requirements. It is a much simpler rent structure, requires less documentation and makes rent determinations easier. EHV participants and case managers will benefit from reduced verification and paperwork requirements. This is the system all of our partners understand.
<b>Rent Reform Initiative 4</b>	<b>Rent Choice.</b> This allows participants to rent a unit at up to 50% of monthly income in some instances	It does not conflict with EHV requirements and makes a wider range of units available to participants
<b>Rent Reform Initiative 5</b>	<b>Average Utility Allowance.</b> This is a simplified utility allowance calculation.	It does not conflict with EHV requirements and is a much easier to understand and use utility allowance that is integral to our rent and payment standard system.
<b>Rent Reform Initiative 6</b>	<b>Biennial Re-examinations.</b> Elderly and Disabled households have rent and income re-certifications every two years.	It does not conflict with EHV requirements and is likely allowable under current HUD guidelines. It is anticipated that many EHV participants will benefit from less frequent re-examinations.


<b>Other Initiative 1</b>	<b>Income Eligibility</b> Maintains 50% of AMI eligibility and eliminates federal income targeting.	This conforms with existing guidance that EHV are not subject to income targeting requirements. EHV's will be referred by the COC and subject to 50% AMI income limit.
<b>Other Initiative 2</b>	<b>Responsible Portability.</b> Porting is allowed for good cause such as work, disability needs and fleeing domestic violence. Families may port to higher rental cost areas only if the PHA absorbs the voucher.	This does not conflict with the EHV requirements in the Notice. We would comply with the portability requirements in the Notice including the waiver for non-resident applicants, for example. In Lincoln, most porting occurs by waiting list shoppers moving across the country from very high-cost areas to get a voucher and then move back. This is unlikely to be the situation for EHV participants referred by the COC.
<b>Other Initiative 3</b>	Removed	NA
<b>Other Initiative 4</b>	<b>HQS Inspections Waiver.</b> This initiative provides a method to distinguish higher quality properties and inspect them on a two-year cycle. It also makes improvements/modifications to the Request for Tenancy Approval Form.	This does not conflict with the EHV requirements and is critical for ongoing landlord acceptance of the vouchers.
<b>Other Initiative 5</b>	<b>Inspections and Rent Reasonableness.</b> This allows LHA to inspect LHA-owned properties.	It does not conflict with EHV requirements and will allow high quality LHA LIHTC or other properties to be available to EHV
<b>Other Initiative 6</b>	<b>Project-Based Vouchers</b>	Since EHV's cannot be project-based, this initiative would not apply.
<b>Other Initiative 7</b>	<b>RentWise Tenant Education</b>	We will make RentWise classes available to EHV participants, but the particulars of this initiative would not apply since it deals with MTW funding flexibility.
<b>Other Initiative 8</b>	<b>Resident Services Program</b>	This initiative is not applicable to EHV.
<b>Other Initiative 9</b>	<b>Landlord Incentive HAP</b>	In consultation with the COC, we will likely offer landlord incentives such as signing bonuses to EHV's utilizing the



		EHV Service Fees or another source. Since this is allowed under EHV but will come from a EHV source of funding rather than MTW, this initiative does not apply to EHV.
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Thank you for considering our request. We are actively developing a Memorandum of Understanding with our Continuum of Care program partners at this time. Your prompt response to this request is critical to allow us to move forward. If you have any questions or concerns, please contact me at [chris@l-housing.com](mailto:chris@l-housing.com) or 402-434-5540.

Sincerely,



Chris Lamberty  
Executive Director

cc: Julie Steadman, Omaha HUD Office  
Christopher Golden/Marianne Nazzaro, MTW Program Office



OFFICE OF PUBLIC AND INDIAN HOUSING

June 28, 2021

Chris Lamberty  
Executive Director  
Housing Authority of the City of Lincoln, Nebraska  
5700 R Street  
Lincoln, NE 68505

Dear Mr. Lamberty:

This correspondence responds to your agency's letter regarding the extension of Moving to Work (MTW) flexibilities to the Emergency Housing Voucher (EHV) program. In that letter, the Housing Authority of the City of Lincoln, Nebraska (LHA- NE002) requested the following flexibilities be applied to the administration of Emergency Housing Vouchers (EHVs) made available through Notice PIH 2021-15:

- Delaying rent increases until next annual reexamination
- Applying minimum earned income to calculations of annual income
- A simplified rent calculation, including setting total tenant payment (TTP) at 27% of gross income and applying \$25 minimum rent
- Allowing participants to rent a unit at up to 50% of monthly income in some instances
- Providing a simplified utility allowance
- Holding biennial reexaminations for elderly and disabled households
- Waiving income targeting
- Restricting portability except as part of a reasonable accommodation for employment, education, safety, or medical/disability need and requiring the receiving PHA to absorb the voucher if the receiving PHA's FMRs exceed those of LHA
- Waiving inspections for one year if the annual inspection meets 100% of HQS upon first inspection at initial or annual inspections
- LHA performing inspections and rent reasonableness determinations on all tenant and project-based units
- Providing a voluntary 12-hour curriculum on issues related to tenant readiness

In your letter, you explain that implementing a new set of rent and inspection requirements for EHV would be burdensome for LHA and allowing EHV rent and inspection requirements to match existing MTW program flexibilities will result in a more efficient and successful program. Section 10 of PIH Notice 2021-15 states that "MTW agencies that administer EHVs are bound by the terms and conditions of this notice. As discussed above in section 9, all HCV statutory and regulatory requirements and HUD directives are applicable to EHVs unless waived by this notice." EHV funding, including HAP and administrative fees, is not eligible for fungibility and must only be used for EHV eligibility activities and to assist EHV eligible families.

However, per the American Rescue Plan Act, “the Secretary may waive or specify alternative requirements for any H. R. 1319—57 provision of the United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) or regulation applicable to such statute other than requirements related to fair housing, nondiscrimination, labor standards, and the environment, upon a finding that the waiver or alternative requirement is necessary to expedite or facilitate the use of amounts made available in this section.” As stated in Section 10 of PIH Notice 2021-15, MTW agencies may request approval from HUD to administer EHV in accordance with the HCV programmatic flexibilities approved under the PHA’s Annual MTW Plan or MTW Supplement to the PHA Plan, as permitted by its MTW Agreement or the MTW Operations Notice, provided that HUD determines that the requested flexibilities do not directly conflict with an EHV waiver and would not have a detrimental impact on EHV families.

In reviewing the details of your request, I have determined that some of the requested flexibilities do not directly conflict with an EHV waiver and would not have a detrimental impact on EHV families. Therefore, I find good cause to approve LHA’s request for the following flexibilities:

- Delaying rent increases until next annual reexamination
- A simplified rent calculation, including setting total tenant payment (TTP) at 27% of gross income, \$25 minimum rent, and a \$5000 asset test
- Improving rent choice by ensuring that maximum initial rent does not exceed 50% of monthly income
- Providing one standard utility allowance per bedroom size regardless of tenant utility responsibility
- Holding biennial reexaminations for elderly or disabled households
- Waiving inspections for one year if the annual inspection meets 100% of HQS upon first inspection at initial or annual inspections
- Performing all inspections and rent reasonableness determinations on all tenant and project-based units regardless of property management ownership
- Providing a voluntary 12-hour curriculum on issues related to tenant readiness

Your request to apply the following requested flexibilities is denied after determining that they would have a detrimental impact on EHV participants and/or conflict with an EHV waiver or alternative requirement:

- Applying minimum earned income to calculations of annual income
- Restricting portability except as part of a reasonable accommodation for employment, education, safety, or medical/disability need and requiring the receiving PHA to absorb the voucher if the receiving PHA’s FMR exceeds those of LHA

Families entering the EHV program may face significant barriers to immediately securing employment due to a variety of factors, including health and financial challenges resulting from the COVID-19 pandemic. As you note in your letter, while many EHV families may be exempted from minimum earned income through the hardship policy, some may be subjected to the minimum earned income. The minimum earned income policy may have a detrimental

impact to those families resulting in an annual income calculation that is not reflective of their current economic circumstances.

Due to the target populations for EHV, participants may face additional barriers to successfully using their voucher. To help ensure that EHV participants can find a suitable unit by providing maximum housing choice, HUD has removed the restriction on portability at Section 8(r)(1)(B)(i) of the United States Housing Act of 1937 and 24 CFR 982.53(c). Restricting portability except under certain circumstances conflicts with the EHV waiver alternative requirements for portability under EHV.

A flexibility to waive income targeting requirements for EHV is not needed as per Section 9j of PIH Notice 2021-15, HUD has waived the income targeting requirements of Section 16(b) of the United States Housing Act of 1937 and § 982.201(b)(2).

Should you have any questions regarding this matter, please contact Emily Warren, Voucher Program Specialist, Housing Voucher Management and Operations Division, at [Emily.J.Warren@hud.gov](mailto:Emily.J.Warren@hud.gov).

Sincerely,

*Danielle Bastarache*  
Danielle Bastarache  
Deputy Assistant Secretary  
Office of Public Housing and Voucher Programs

Internal HUD Distribution:						
Identification Lines:						
Correspondence Code	Originator	Concurrence	Concurrence	Concurrence	Concurrence	Concurrence
Name						
Date						

## **APPENDIX C**

### **Request for Inspection and Unit Information Form**

**Request for Inspections and Unit Information  
Moving to Work Housing Choice Voucher Program**

Owner:

Thank you for your interest in working with Lincoln Housing Authority to provide affordable housing.

Please complete and return the attached form with your potential tenant.

The form may be mailed, hand delivered, emailed, or faxed.

Return the form to:  
Lincoln Housing Authority (LHA)  
5700 R Street  
Lincoln, NE 68505

Fax: (402) 434-5502  
Email form to: [Inspectiondesk@L-housing.com](mailto:Inspectiondesk@L-housing.com)

An inspection of your unit will be scheduled once we receive the completed form. At the time of the appointment our inspector will determine if the unit meets minimum Housing Quality Standards (HQS) and the proposed rent is acceptable within the current market conditions.

If you have any questions about this form, the inspection or the process to participate as an owner with the Moving to Work Housing Choice Voucher program, please feel free to contact the Inspections Department at (402) 434-5522.

## Lease Information

After the unit passes inspection and before LHA can approve the Housing Assistance Payment (HAP) contract with the owner, the owner must provide LHA a copy of the signed lease with the tenant.

The following items are required to be disclosed in the lease.

1. **Owner/Landlord** name and **Tenant(s)** name
2. **Contract Rent** (as approved by the inspector).
3. **Address** of the unit including any apartment number.
4. **The term of the lease** must match the HAP contract. The term must be for a 12 month period but not more than 12 months. Example lease starts on 01-15-12, then it must end 12-31-12.
5. **Renewal terms.** Will the lease continue month-to-month or year-to-year?
6. **Utilities.** State what utilities the owner will provide and what utilities the tenant will provide.
7. **Appliances.** State what appliances are provided by the owner such as stove, refrigerator, dishwasher, washer and dryer and etc.
8. **Signatures** by both the tenant and owner/property manager.

The HUD tenancy addendum will be attached to your lease once LHA approves the Housing Assistance Payment contract with you.

## Payment Information

After the unit passes inspection, LHA will mail or email the owner a Housing Assistance Payment (HAP) contract. The owner will return the signed contract with their signed lease for LHA's approval. Once LHA approves the contract and lease, the payment will be issued to the owner via direct deposit. All Housing Assistance payments made to the owner is reported to the Internal Revenue Service (IRS) as indicated on the W-9 on file with LHA.

Please note: The owner (including a principal or other interested party) cannot be the parent, child, grandparent, grandchild, sister or brother of any member of the family unless LHA has determined (and has notified the owner and the family of such determination) that approving the lease of the unit, notwithstanding such a relationship, would provide reasonable accommodation for a family member who is a person with disabilities.

## Inspection Incentive

Typically, LHA is required to inspect each assisted unit on a yearly basis. The incentive is if your unit passes inspection at the first inspection and does not require additional items to be rechecked at a later date, then LHA will skip the following year's required annual inspection.



Office Use Only

Inspection Date: \_\_\_\_\_  
 Time: \_\_\_\_\_  
 Inspector: \_\_\_\_\_  
 Tenant name: \_\_\_\_\_

**Unit Information**

**Address of Unit to be rented**

Street Address \_\_\_\_\_ Apartment # \_\_\_\_\_ Zip Code \_\_\_\_\_

**What are you proposing to charge for rent?**

**Unit information**

Rent Amount? \_\_\_\_\_ Date unit available for inspection? \_\_\_\_\_ # of bedrooms \_\_\_\_\_ Year constructed \_\_\_\_\_

**Unit Type: Check one**

- Apartment     Duplex     House     Town House/Row House     Mobile Home     Tri-plex

**Who will be responsible to pay for the following utilities?**

The tenant can be responsible any utilities provided to the unit as long as the utility is metered separately from other tenants and common areas.

Check box	Who pays?	Fuel type?			
Heating	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric	<input type="checkbox"/> Other	_____	
Cooling	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric	<input type="checkbox"/> Other	_____	
Other Electric	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Other	_____	
Cooking	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric	<input type="checkbox"/> Other	_____	
Water Heating	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric	<input type="checkbox"/> Other	_____	
Water/Sewer	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner				
Trash collection	<input checked="" type="checkbox"/> Owner: Lincoln Municipal Code				

**Who will be responsible to provide the following appliances?**

Check box	Who provides?	What utility does it use?
Range/Stove	<input type="checkbox"/> Owner <input type="checkbox"/> Tenant	<input type="checkbox"/> Gas <input type="checkbox"/> Electric
Refrigerator	<input type="checkbox"/> Owner <input type="checkbox"/> Tenant	

**Please check the box, if the owner will provide the following**

- Dishwasher     Disposal     Washer     Dryer     Microwave     Garage

**Are you related to any household member who will be residing in the unit?**     Yes     No

If yes, how are you related? \_\_\_\_\_

**Is this unit federally subsidized by another program?**     Yes     No

If yes, check the box that indicates the type of subsidy.

Home     Section 202     Section 221(d)(3)(BMIR)     Tax Credit  
 Section 236 (Insured and noninsured)     Section 515 Rural Development     Other \_\_\_\_\_

**Indicate the number of units in the building or apartment complex** \_\_\_\_\_

(If 5 or more units, please complete the following comparison.)  
 Provide three (3) comparisons of contract rent for any "unassisted" units that are similar to the unit listed above, i.e. same bedroom size, and located within the same premise. Start with comparable units with lowest rent first.

Address and unit number	Rent amount	Date lease/rent started



Please note that LHA has not screened the family's behavior or suitability for tenancy. Screening is the owner's own responsibility.

**Tenant and Owner Representative:** By signing this form, you certify the information given to Lincoln Housing Authority is accurate and complete to the best of your knowledge and belief. Your signatures indicate the unit is ready to be inspected by LHA. The Head of Household's signature confirms he/she has examined the unit and the unit's current condition is acceptable "as is." *Tenant: If you are requiring repairs or changes to this unit, please have them completed by the owner before submitting this form to LHA to schedule the inspection.*

Print or Type Name of Owner/Owner Representative		Print or Type Name of Household Head	
Signature		Signature (Household Head)	
Business Address (street, city, state and zip)		Present Address of Family (street, apartment no., city, state, & zip)	
Telephone	Date (mm/dd/yyyy)	Telephone Number	Date (mm/dd/yyyy)
Owner or property manager Email address			

Check box if you do not want to receive contract and other documents through email

Attention Owner/Manager- Check Proceeds will be reported to the IRS as indicated on the W-9 on file with LHA. Please complete the following as it appears on the W-9 on file with Lincoln Housing Authority.

<b>Owner Name:</b>
<b>Owner Social Security Number or Federal ID number:</b>

**ESTIMATE ONLY!**

If Rent is equal to or exceeds \$\_\_\_\_\_ (target rent) then the Maximum Payment from LHA will be \$\_\_\_\_\_.

Final payment determination is made after contracts are approved by LHA.

**Move-In Date & Assistance Start Date**

The **owner** and **tenant** decide when the tenant can move into the unit; LHA recommends the tenant waits to move into the unit until after the unit has passed inspection.

Housing Assistance cannot start prior to \_\_\_\_\_, the date the unit passes inspection or the date the tenant moves into the unit, whichever occurs last.

**Tenant Information**

Tenant/Applicant name \_\_\_\_\_ #SSN \_\_\_\_\_

\_\_\_\_ Voucher BR Size      \_\_\_\_ Family Size      Minors under 6 years old:     Yes       No

Next Annual Re-exam to be completed by \_\_\_\_\_

Housing Representative \_\_\_\_\_ Payment Standard \_\_\_\_\_ Target rent \_\_\_\_\_

## Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards - Lead Warning Statement

Housing built before 1978 may contain lead-based paint. Lead from paint chips and dust can pose health hazards if not taken care of properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing landlords must disclose the presence of known lead-based paint and lead-based paint hazards in the dwelling. Lessees must also receive a Federally approved pamphlet on lead poisoning prevention.

**Owner please complete with tenant or provide a copy of your lead-based paint disclosure statement.**

**Non-applicable** - Unit was built after 1978 (If you checked box, skip to Certification of Accuracy Section)

### **Lessor's (Owner) Disclosure (Owner initial where applicable)**

Initial \_\_\_\_\_ (a) Presence of lead-based paint or lead-based paint hazards (check one below):

Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

\_\_\_\_\_

Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

Initial \_\_\_\_\_ (b) Records and reports available to the lessor (check one below):

Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

### **Lessee's (Tenant) Acknowledgment (Tenant initial where applicable)**

Initial \_\_\_\_\_ (c) Lessee has received copies of all information listed above.

Initial \_\_\_\_\_ (d) Lessee has received the pamphlet Protect Your Family from Lead in Your Home.

### **Agent's Acknowledgment (Agent initial if applicable)**

Initial \_\_\_\_\_ (e) Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4852(d) and is aware of his/her responsibility to ensure compliance.

### **Certification of Accuracy**

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information provided by the signatory is true and accurate.

Lessor (Owner) \_\_\_\_\_ Date \_\_\_\_\_

Lessee (Tenant) \_\_\_\_\_ Date \_\_\_\_\_