

Louisville Metro Housing Authority

Moving to Work Annual Plan

Fiscal Year 2020

July 1, 2019 – June 30, 2020

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I. Introduction

The Louisville Metro Housing Authority (LMHA), formerly known as the Housing Authority of Louisville, is a nonprofit agency responsible for the development and management of federally assisted housing in the Louisville Metro area. LMHA was formed in 2003 as the result of a merger of the Housing Authority of Louisville and the Housing Authority of Jefferson County. A nine-member Board of Commissioners, appointed by the Metro Mayor, serves as the policy making body of the Agency. LMHA serves over 12,900 low-income families with children, seniors and people with disabilities through its public housing and rental assistance voucher programs.

A. Moving To Work (MTW) Demonstration Program Overview

LMHA, then the Housing Authority of Louisville, has been a participant in the Moving to Work (MTW) Demonstration Program since 1999. The MTW Program, authorized by Congress and signed into law as part of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, provides public housing agencies (PHAs) with the flexibility to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families. The program allows waivers of certain existing low-income Public Housing (Section 9) and Housing Choice Voucher (Section 8) regulations and statutory provisions and permits LMHA to combine public housing operating and capital funds, along with Housing Choice Voucher rental assistance funds, into a single agency-wide MTW Block Grant.

The terms and conditions of LMHA's participation in the MTW Program, including the waivers authorized under the MTW statute, are defined in the MTW Agreement between LMHA and the US Department of Housing and Urban Development (HUD). The current MTW Agreement extends through 2028.

Each year, LMHA creates and adopts an MTW Annual Plan that describes new and ongoing activities that utilize MTW authority. HUD approval is required for the Annual Plan. This document is LMHA's MTW Annual Plan for Fiscal Year 2020, i.e. the period from July 1, 2019 through June 30, 2020. The MTW Annual Plan focuses primarily on the Public Housing, Housing Choice Voucher (HCV), and Capital Fund programs, as these are the LMHA programs that fall under the MTW demonstration. It provides information on newly proposed MTW activities, as well as MTW activities that were previously approved by HUD and are ongoing. The Annual Plan also incorporates information about some of LMHA's non-MTW initiatives, which are activities that do not require the use of MTW programmatic or financial flexibility. The MTW Annual Report, which is prepared at the end of each Fiscal Year, provides an update on the status and outcomes of those activities included in the MTW Annual Plan.

MTW Statutory Objectives

Each of LMHA's MTW activities must support at least one of the following three MTW statutory objectives:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Provide incentives to residents, especially families with children, to obtain employment and become economically self-sufficient; and,
- Increase housing choices for low-income families.

B. Long-Term MTW Goals and Objectives

LMHA believes that MTW designation provides an important set of programmatic and financial tools that can be utilized to support the agency’s mission, which is to provide quality, affordable housing for those in need, to assist residents in their efforts to achieve financial independence, and to work with the community to strengthen neighborhoods.

At the inception of LMHA’s designation as an MTW agency, LMHA evaluated its own goals and objectives in relation to those of the MTW demonstration. The outcome of this process was the development of six long-term goals for LMHA’s participation in the MTW program:

- Increase the share of residents moving toward self-sufficiency;
- Achieve a greater income mix at LMHA properties;
- Expand the spatial dispersal of assisted housing;
- Improve the quality of the assisted housing stock;
- Reduce and/or reallocate administrative, operational and/or maintenance costs; and
- Enhance the Housing Authority’s capacity to plan and deliver effective programs.

These broad goals have served as the framework for all LMHA’s MTW Annual Plans including the FY 2020 Plan. LMHA has also recognized a growing number of populations with specific needs that often go unmet by the existing housing and support service infrastructure. In addition to its original MTW goals, LMHA has established the goal to develop programs and housing stock targeted to populations with special needs, especially those families not adequately served elsewhere in the community.

C. MTW Activity Overview

An MTW activity is defined as any activity LMHA engages in that requires programmatic or financial flexibility to waive statutory or regulatory requirements, pursuant to the MTW Agreement.

A summary listing of LMHA’s MTW activities, including both newly proposed and previously approved activities, is found below in Table 1. Table 1 has been modified from prior Annual Plans to reflect streamlining and reformatting of some activities where the MTW authorizations are the same and the activities relate to the same policy or program areas. See Section IV. Approved MTW Activities for additional information.

Table 1: Moving to Work (MTW) Activity Matrix

Activity #	MTW Activity	Status
2020-1	Rent Simplification, including newly proposed provisions as well as the following previously approved activities: <ul style="list-style-type: none"> • Activity #6-2008, Housing Choice Voucher (HCV) Program - Earned Income Disregard for Elderly Families; 	Proposed

Activity #	MTW Activity	Status
	<ul style="list-style-type: none"> • Activity #8-2008, HCV Program & Public Housing - Standard Medical Deduction; • Activity #32-2012, HCV Program & Public Housing - Elimination of the Earned Income Disregard; and • Activity #40-2014, HCV Program - Financial Aid Disregard in Calculation of TTP 	
2020-2	Streamlined Flat Rent	Proposed
2020-3	Local Forms	Proposed
2020-4	FSS Program Enhancements	Proposed
2020-5	Gap Financing	Proposed
2005-1	<p>Special Referral MTW HCV Programs (formerly Activity #44-2015), including the following previously approved activities:</p> <ul style="list-style-type: none"> • Sub-Activity #1-2005, The Villager – Center for Women and Families (CWF); • Sub-Activity #7-2008, Day Spring (Renewed 2012); • Sub-Activity #15-2009, Louisville Scholar House – Family Scholar House (formerly Project Women); • Sub-Activity #20-2010, Downtown Scholar House - Family Scholar House with Spalding University; • Sub-Activity #30-2012, 100,000 Homes Initiative; • Sub-Activity #31-2012, Stoddard Johnston Scholar House - Family Scholar House; • Sub-Activity #34-2012, Wellspring - Youngland Avenue Facility; • Sub-Activity #35-2012, Allocate MTW Housing Choice Vouchers to Special Referral Programs; • Sub-Activity #36-2013, Wellspring – Bashford Manor / Newburg Facility; • Sub-Activity #38-2013, Parkland Scholar House - Family Scholar House; • Sub-Activity #42-2015, Centerstone (Formerly Seven Counties Services, Inc.) Initiative; • Sub-Activity #46-2017, Riverport Scholar House - Family Scholar House; and, • Sub-Activity #47-2017, ChooseWell Communities, Inc. 	Implemented
2006-1	<p>MTW Homeownership Program, including the following previously approved activities:</p> <ul style="list-style-type: none"> • Activity #3-2006, HCV Homeownership Program - Amount and Distribution of Homeownership Assistance; • Activity #11-2009, HCV Homeownership Program - Flexibility in Third-Party Verifications; and, • Activity #13-2009, HCV Homeownership Program – Exception Payment Standards (Revised 2016) 	Implemented
2007-1	Streamlined Recertification Process (formerly Activity #4-2007, referred to as Alternate Year Reexaminations) (Revised 2012, 2014)	Implemented
2008-1	<p>Occupancy at Elderly Developments, including the following previously approved activities:</p> <ul style="list-style-type: none"> • Activity #10-2008, Locally Defined Definition of Elderly; and, 	Implemented

Activity #	MTW Activity	Status
	<ul style="list-style-type: none"> Activity #23-2010, Public Housing - Lease-up Incentives for New Residents at Dosker Manor 	
2009-1	Streamlined Development and Acquisition, including the following previously approved activities: <ul style="list-style-type: none"> Activity #18-2009, Public Housing - Simplification of the Public Housing Development Submittal; and, Activity #26-2011, Public Housing – Acquisition of Mixed-Income Sites 	Implemented
2011-1	HCV Child Care Deductions Policy (formerly Activity #27-2011)	Implemented
2014-1	Public Housing Sublease Programs, including the following previously approved activities: <ul style="list-style-type: none"> Activity #29-2015, Public Housing - Sublease Agreement with YouthBuild Louisville; and, Activity #37-2014, Public Housing - Sublease Agreement with Frazier Spinal Cord Rehab Institute 	Implemented
2014-2	HCV Program Rent Increase Limit (formerly Activity #39-2014)	Implemented
2015-1	HCV Program - HUD/MDRC Rent Reform Demonstration (formerly Activity #43-2015)	Implemented
2018-1	Beecher Terrace CNI Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing (formerly Activity #49-2018)	Implemented
2018-2	Increasing Housing Options for Relocating Beecher Terrace Families (formerly Activity #50-2018)	Implemented
2019-1	Enhancements to Local Project-Based Voucher Program, including the following previously approved activities: <ul style="list-style-type: none"> Activity #48-2018, Local Project-Based Voucher Program; and, Activity #51-2019, Enhancements to Local Project-Based Voucher Program 	Implemented
2011-2	Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing (formerly Activity #28-2011)	Not Yet Implemented
2010-1	Public Housing Sublease Agreement with Catholic Charities (formerly Activity #25-2010)	On Hold
2-1999	MTW Unit Inspection Protocol	Closed Out
5-2007	Spatial Deconstruction of HCV Assisted Units	Closed Out
9-2007	Public Housing - Term Limits and Employment/Education Requirements for New Scattered Sites (Revised 2014, 2016)	Closed Out
16-2009	Explore HUD’s Streamlined Demolition and Disposition Application Process for MTW Agencies	Closed Out
24-2010	Increased Flat Rents	Closed Out
21-2010	Occupancy Criteria Changes for New Scattered Sites – Mandatory Case Management	Closed Out
33-2012	Rents Set at 30% of Adjusted Income – Public Housing Program	Closed Out
45-2016	MTW Special Referral Program – Coalition for the Homeless “Move Up” Initiative	Closed Out

D. FY 2020 Goals and Objectives

LMHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2020. LMHA projects that 12,915 households will be served through the Agency's rental assistance, public housing and Local, Non-Traditional activities in FY 2020. As LMHA's funding for FY 2020 is unknown as of the publication date of the MTW Annual Plan, the activities described herein may be modified based on actual funding levels.

Highlights of planned FY 2020 activities include:

- **Rent Policies:** LMHA is re-proposing a consolidated rent simplification activity. The Activity will include previously approved rent simplification policies, such as a standard medication deduction. Additionally, LMHA plans on incorporating several new rent simplification policies in FY 2020, including:
 - A revised asset policy;
 - Exclusion of full-time student income;
 - Exclusion of adoption assistance payment; and,
 - A revised method of payment standard application.

All rent simplification policies are expected to streamline the rent calculation process and incentivize household members to pursue job training or education programs or obtain employment.

- **Streamlined Flat Rent:** In FY 2020 LMHA will implement a new Streamlined Flat Rent policy. The revised policy will allow LMHA to update flat rents every 5 years, except in cases where the average Fair Market Rent (FMR) increases more than 5% in any given year. The new process will significantly reduce the amount of time staff spend annually on flat rent updates for public housing families.
- **Local Forms:** LMHA intends to develop local versions of HUD required forms to streamline processing. Upon HUD approval of the proposed activity, LMHA will revise several forms in FY 2020 and anticipates cost savings associated with the implementation.
- **FSS Program Enhancements:** LMHA is proposing to enhance its Family Self-Sufficiency (FSS) Program in FY 2020. Enhancements are expected to better assist participants in attaining self-sufficiency goals and streamline processes for administering staff.
- **Gap Financing Program:** LMHA will use MTW flexibility in FY 2020 to assist in the development and preservation of affordable housing. By providing developers awarded Project Based Vouchers (PBVs), gap financing in the form of loans and capital grants, LMHA will make development deals more feasible.
- **Housing Options for Beecher Relocates:** Given the significant number of families, living in one-bedroom units, who are being relocated due to modernization projects at Beecher Terrace and the limited number of one-bedroom units available in Louisville, LMHA will continue to implement initiatives to:

- Incentive owners to participate in the HCV program; and,
- Provide one-bedroom families the flexibility to rent two-bedroom units.

In FY 2020 LMHA will complete the third phase of Beecher relocation, during which 168 families will be relocated. Of the 168 families, 98 of them currently live in a one-bedroom unit and will most likely utilize the flexibility provided by this activity.

- ***Off-Site, Mixed Income Replacement Housing:*** Under this MTW activity, LMHA is pursuing the acquisition of off-site Beecher Terrace replacement housing. Specifically, LMHA is seeking to purchase two 4-plexes. Four of the units will be used as Beecher replacement housing and four of the units will be acquired using MTW Broader Use of Funds. These units will be restricted to households with incomes below 80% of Area Median Income (AMI), but will not receive direct, ongoing operating subsidy. Louisville Metro Housing Authority Development Corporation (LMHADC) will purchase the property. Therefore, HUD approval is not required. LMHA will acquire properties as needed up to a cost of \$8,250,000 to reach the requirement of one-for-one replacement up to 110 units.
- ***Enhancements to Local Project-Based Voucher (PBV) Program:*** To streamline and incentivize affordable housing development and preservation and meet public housing replacement requirements for LMHA’s Choice Neighborhood Initiative (CNI) grant, LMHA proposed revisions to PBV policies in an amendment to the FY 2019 Plan. LMHA is in the process of issuing a revised PBV Request for Proposal (RFP), which will include new provisions, expected to attract more developer interest. Because of the expected increase in developer interest, LMHA expects to execute several Housing Assistance Payment (HAP) and Agreement to Enter into a Housing Assistance Payment (AHAP) contracts by the end of FY 2020. Additionally, LMHA will use alternate site and neighborhood selection standards provided in the agency’s MTW Agreement.
- ***Special Referral Programs:*** Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. In FY 2020, LMHA anticipates that over 500 Housing Choice Vouchers will be utilized to assist these families in making strides toward self-sufficiency and increasing their housing choices. Additionally, LMHA plans to add a new voucher allocation to the Special Referral Program. LMHA will partner with Volunteers of America Mid-States to provide up to 50 HCVs for woman recovering from substance abuse disorders and who are pregnant and/or parenting.
- ***Self-Sufficiency Programs*** –LMHA has implemented Homeownership, Special Referral and the Family Self-Sufficiency programs to assist and support participants in achieving economic self-sufficiency. These initiatives leverage MTW Block Grant funding to secure additional public and private support.
- ***Homeownership:*** LMHA will continue to administer its Homeownership Program in FY 2020. LMHA anticipates that the increased subsidy for one-bedroom eligible households as well as the increased maximum subsidy in areas of opportunity will continue to help voucher holders achieve homeownership as well as result in increases to the number of households purchasing units in areas of opportunity.
- ***Elderly/Disabled Housing:*** LMHA will continue to use MTW flexibility in FY 2020 to maximize leasing at elderly/disabled developments. Efforts include changing the definition of elderly from

62 to 55 and above and providing lease-up incentives. It is anticipated that these initiatives will continue to increase occupancy rates at these developments.

- ***Streamlined Recertification Process:*** In FY 2020, LMHA will implement triennial recertifications for households whose only source of income is fixed and biennial recertifications for all other HCV and PH households. By extending the scope of LMHA’s recertification policy, LMHA anticipates significant cost and staff time savings.
- ***Owner Rent Increase Limit:*** LMHA will continue to place a cap on annual contract rent increases. LMHA conducts reasonable rent determinations on a sample of units to ensure that rents are reasonable while maintaining the administrative efficiencies gained through this activity.
- ***HUD Rent Reform Demonstration:*** FY 2020 represents the fifth of six years of the HUD Rent Reform Demonstration. The Study sets forth alternative rent calculation and recertification strategies that have been implemented at several public housing authorities across the country to fully test the policies nationally. In FY 2020, because of households leaving the program, it is anticipated that the Alternate Rent Group will have 580 households and the Control Group will have 672 households. The study is scheduled to end in 2021.
- ***Public Housing Development:*** As part of its goal to transform aging portions of LMHA’s physical housing stock while providing replacement units, LMHA developed and implemented revised development and acquisition policies. These policies expedite the process for LMHA to develop and/or acquire affordable housing. In FY 2020, LMHA plans to extend the scope of this activity to include acquisition of sites and/or units for Beecher Terrace replacement, PBV development and/or preservation, as well as public housing mixed income sites.
- ***Units for Underserved Populations:*** In its efforts to provide units to underserved populations, LMHA will continue to provide:
 - Fully accessible units to individuals with disabilities in partnership with Frazier Rehab Institute. The program provides transitional housing for up to six months per family. Frazier Rehab sub-lessees are also referred to area service providers to assist them to leave the program and obtain stable housing.
 - Temporary housing for low-income YouthBuild Louisville (YBL) participants who are experiencing homelessness. Up to three, 2-bedroom units will be available for YBL participants who may stay in the unit if they are active in the YBL program. LMHA provides a public housing preference to these individuals upon graduation from YBL.

Along with its MTW implementation activities, LMHA will implement other initiatives in FY 2020 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of LMHA’s planned non-MTW activities include:

- ***Development and Redevelopment Activities***
 - ***Russell Choice Neighborhood Transformation;*** LMHA plans to continue the redevelopment efforts in the Russell neighborhood in FY 2020:

- Phase II demolition and Phase I construction are both planned to commence before the beginning of FY 2020.
 - Other neighborhood investments will also resume before the beginning of FY 2020, such as the railroad overpass mural and construction of artistic bus stops.
 - Environmental work currently underway with anticipated commencement of Critical Community Improvements during FY2020
- *Friary*: LMHA continues to make progress in the redevelopment of the 24 units at the Friary. LMHA has procured a private developer and anticipates closing in FY 2019. Once renovation work has been completed, LMHA will utilize 18 of the renovated units for public housing. An additional six replacement public housing units will be acquired in non-impacted areas.
 - *Sheppard Square HOPE VI Revitalization*: LMHA is still pursuing the outstanding homeownership units and anticipates Habitat for Humanity will develop at least five of the homeownership lots. Additionally, the final construction contract for 760 S. Hancock Street is on hold due to litigation with the contractor. Currently the building is fully occupied.
- ***Grants and Grant Opportunities*** – In FY 2020, LMHA will continue to administer existing grants, which include the FSS Coordinator and ROSS grants and Choice Neighborhoods Implementation and Action Grants. LMHA’s AmeriCorps VISTA and ConnectHomeUSA grant terms end prior to FY 2020. LMHA will continue to pursue additional grant opportunities as they become available.
 - ***Prudent Fiscal Management and Internal Controls*** – LMHA will continue to implement a comprehensive program of internal audit, compliance reviews and fiscal management.

II. General Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

LMHA does not plan to add any new public housing units to its inventory in FY 2020.

Table 2: Planned New Public Housing Units in FY 2020

AMP Name and Number	Bedroom Size						Total Units	Population Type*	# of UFAS Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added in the Plan Year

0

*Population Type: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type is "Other" please describe:

N/A

ii. Planned Public Housing Units to be Removed

Table 3: Planned Public Housing Units to Be Removed in FY 2020

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Bayberry KY001000034	10	LMHA plans to remove 10 public housing units at Bayberry, due to excessive repairs needed. Additionally, the units at Bayberry are condos LMHA owns in a larger condo development. LMHA's units experience excessive maintenance needs and costs often due to issues caused by non-LMHA owned units.
Manslick KY001000034	16	LMHA plans to remove 16 public housing units at Manslick, due to excessive repairs needed. LMHA is currently assessing of the cost of repair exceeds the cost of replacement.
Chestnut St. KY001000017	3	The property located at 2400 Chestnut St. has structural problems (brick façade wall) and all 3 units need to be completely renovated (major roof leaked that caused extensive damage). Because of the cost for renovation, it was decided the best course of action was to dispo the property. LMHA is in the process of getting estimates from its A/E

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
		and Environmental consultant to go through the disposition process.
	29	Total Public Housing Units to be Removed in the Plan Year

iii. **Planned New Project Based Vouchers (PBV)**

Table 4: New Housing Choice Vouchers to be Project-Based in FY 2020*

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
See explanation below*			
		Planned Total Vouchers to be Newly Project-Based	
* The new 50900 requires reporting of planned PBVs, which will be either under AHAP or HAP during the Annual Plan fiscal year. As of the submission date of this Plan, LMHA is in the process of soliciting PBV proposals. Given that LMHA's MTW Plan is due to HUD prior to the evaluation and/or selection of the proposals, LMHA cannot identify which projects will be awarded PBVs at this time. LMHA will report on all projects and PBVs committed and leased/issued in the FY 2020 Annual Report.			

iv. **Planned Existing Project Based Vouchers**

LMHA currently does not have any project-based vouchers.

Table 5: Planned Existing Project Based Vouchers

Property Name	# of Project Based Vouchers	Planned Status at End of Plan Year*	RAD?	Description of Project
	0	Planned Total Existing Project-Based Vouchers		

*Planned Status: Committed, Leased/Issued

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

LMHA does not anticipate any other changes to LMHA's MTW public housing portfolio in FY 2020.

Table 6: Planned Other Changes to the MTW Housing Stock

Property Name	Description
N/A	N/A

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

LHMA’s capital planning and development strategies are designed to support, rehabilitate, and modernize existing LMHA sites. Utilization of MTW Block Grant funding and programmatic flexibility remains a critical element in LMHA’s modernization and development efforts. LMHA maintains updated physical needs assessments, including estimated replacement and/or repair costs for all LMHA developments.

Table 7 provides information on LMHA’s planned capital and development expenditures for FY 2020 including projects funded from MTW Block Grant and other sources. The information on Table 7 is preliminary and subject to change based on actual funding and other factors. Additionally, Table 7 differs slightly from the attached 5 Year Capital Plan (see Appendix C) as the Capital Plan is developed further in advance of the fiscal year. LMHA revises capital budgets as unforeseen capital needs occur. Actual obligations and expenditures may vary based on factors such as construction schedules, timing of HUD and local approvals, availability of leveraged funding and new and emerging repair needs. Note also that capital projects often are implemented over multiple years.

Table 7: Planned Capital Expenditures During the Plan Year

Project Type	Site Name	Project Description	Total Estimated Budget*
Capital Improvements	Parkway	Replace Gutters, Soffits, Downspouts, Gables	1,126
		HVAC Replacement - Parkway Resource Center	
		HVAC Rooftop unit - Wiggins center	
		Transit Van 350 Replaces 1252	
		Tuckpointing for 58 buildings	
		Tree Trimming	
Capital Improvements	Dosker Manor	Replace apartment door locks due to age	1,203
		Roof	
		Replace Domestic Water Supply/Sanitation drain lines	
		Replace Sump Pump and Cover Building B	
		Boiler system replacement Bldgs A & C	
		HVAC Penthouse A B and C	
		Repair A Bldg parking lot behind Elderserve - sinking	
		Mowers and Blowers	
Capital Improvements	St. Catherine Court	Concrete Foundation Repairs REAC correction of walls, ext. ceilings	25
		Modification and upgrades to Fire Pump per PM Global recommendations	
Capital Improvements	Avenue Plaza/550 Apartments	Parking Lot Repavement - 550 Apartments	25
		Sump Pumps	
Capital Improvements	Scattered Sites	Bathroom Renovations Fegenbush (7 units)	1,940
		Bathroom Renovations Whipps Mill (17 units)	
		Bathroom Renovations East Pages (14 units)	
		Bathroom Renovations Noltemeyer (46 units)	
		Windows 621 E. Catherine, 2127 Bank 960-64 S. 6th, 2404 17 #1	
		Bathroom Renovation - 2 houses Newburg 17 #2	
		Scattered Sites - Replace siding and gutters 17 #2	

Project Type	Site Name	Project Description	Total Estimated Budget*
		Scattered Sites - Noltemeyer - Replace furnace and A/C units 17 #2	
		Window Replacement - 4502 Landside, 8714 - 8718 Bayberry	
		Carpet - # 34 710 and 714 Jacob,836 Shelby,6300 Cottage Field, 6526 Cottage meadows, 2301 Bolling, 1626 Beech, 213 25th, 943 7th, 2704 Grand, 1448 Hancock	
		Carpet - # 45 1820 Neville units 101 103 105 202 203	
		Carpet - # 47 1401 32nd, 1528 Hemolock, 3827 Hale, 604 Hill, 2213 Dumesnil,811 Clay, 1367 Catalpa	
		HVAC replacement for hydronic furnaces need addresses	
		4737 Southern Parkway - new windows 34 #1	
		Furnace and A/C Replacements - Hope VI Scatt Sites 34 #1	
		Gut and Make old LHS Office into Apartment 34 #1	
		Parking lot - Repave and stripe 3332 Breckinridge Lane	
		Breckenridge and Landside common hall flooring 34 #2	
		3332 Breckenridge - Replace furnace and A/C units 34 #2	
		Temple Spears - Carpet Replacement	
		Holly Park - Replace all exterior doors front and back	
		Holly Park - Replace all decks	
		Holly Park - Replace furnaces and A/C units	
		Holly Park - Security System Upgrade	
Capital Improvements	Lourdes Hall/Will E Seay Plaza	Extend Maintenance Shop to South Curb	742
		Replace 3 sets of double doors	
		Parking Lot Patching, Sealing and Striping	
		Repair and Repave Parking Lots, seal, stripe/concrete dumpster pad	
		Upgrade Elevator System	
		Replace Carpet (common halls 2-6)	
		Window replacement	
		Upgrade Camera system	
		Elevator Surveillance Cameras WES Plaza	
Capital Improvements	Park DuValle	Mixed Finance Capital Contributions	138
Capital Improvements	Annual Capital Purchase/Services Contracts	Environmental, Asbestos, AE, Software	1,542
		Appliances, Capital Assets	
		Resident Stipends	
		Eviction Prevention Program	
		Security	
Capital Improvements	Administrative Costs	Construction Administration 10% Transfer under Asset Mgmt.	860
		General Fund for Operations	
Capital Services	Central Stores	Central Stores Facility Video Surveillance Camera (Safety)	30
Capital Services	Regional Maintenance	High Speed Internet Connection at Safety office to view cameras remotely	31

Project Type	Site Name	Project Description	Total Estimated Budget*
		Regional Maintenance Paint and Reseal Roof	
Capital Services	Auto Grounds	Auto Grounds Two 61" Zero Turn Mowers	319
		Auto Grounds Two Salt spreaders	
		Auto Grounds Trailer	
		Van, Transit 350 HD, Replaces 1229 PG&E	
		Van, Transit 350 HD, Replaces 1244 PG&E	
		Van, Transit Connect, Replaces 1216 Extermination	
		Truck, Mid-size 4X4, Replaces 1210 Auto/Grounds	
		Van, Transit 350 HD, replaces 1437 Forced Accts	
		Van, Transit 350 HD, replaces 1449 Forced Accts	
		Van, Transit Connect, Replaces 1260 Extermination	
		Van, small size (Transit Connect) Replace V1216, Extermination	
		Capital Services	
Truck, Mid-size 4X4 Replaces 1211			
Capital Services	Section 8	New Section 8 Facility	1,250
Capital Services	Information Technology	Central Office Phone System Replacement	103
		IT Dept. Servers	
		IT Dept. Storage	
		Pressure Sealer Machine (Finance)	
Total			9,394

*Amounts are listed in \$1,000's

B. Leasing Information

i. Planned Number of Households Served

Table 8: Planned Number of Households Served

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	43,680	3,640
MTW Housing Choice Voucher (HCV) Units Utilized	111,204	9,267
Local, Non-Traditional: Tenant Based	0	0
Local, Non-Traditional: Property-Based	96	8*
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	154,980	12,915
*LMHA utilized the HUD required methodology to populate Planned Number of Households Served by Local, Non-Traditional Activities. However, given that one unit can serve more than one household at a time and the lease term is six months for two of the units on the program, LMHA expects more than 4 Households will be served in FY 2020.		

Table 8A: Local, Non-Traditional Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Tenant-Based	N/A		
Property-Based	Activity #2014-1, Public Housing Sublease Programs	48	4*
Property-Based	Activity #2018-1, Beecher Terrace Choice Neighborhood Initiative (CNI) Revitalization - Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing	48	4
Homeownership		0	0
*LMHA utilized the HUD required methodology to populate Planned Number of Households Served by Local, Non-Traditional Activities. However, given, one unit can serve more than one household at a time and the lease term is six months for two of the units on the program, LMHA expects more than 4 Households will be served in FY 2020.			

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

Table 9: Anticipated Issues and Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	N/A
MTW Housing Choice Voucher	LMHA continues to employ several initiatives to increase utilization of HCV vouchers. In FY 2020, LMHA will implement a voucher success survey to better identify and resolve the issues and obstacles experienced by vouchers holders in locating and leasing units. Additionally, LMHA will develop and implement an automated voucher tracking log so that vouchers can be reissued timelier when and if a prior voucher has expired with no lease-up. LMHA will also be transitioning its waiting list to an updated software, which will allow for ease of WL update and purge. It is anticipated that these program enhancements will result in improved utilization of vouchers.
Local, Non-Traditional	N/A

C. Waiting List Information

LMHA administers its waiting lists in accordance with the Housing Choice Voucher (HCV) Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP), as applicable. Administration of the waiting list for the conventional program areas is managed under the Public Housing Admissions Department to ensure consistent and efficient management of applicants on the various waitlists. Administration of the Site Based Waiting Lists is overseen by each respective management company.

LMHA operates its waiting lists in a nondiscriminatory manner that seeks to avoid unintended discriminatory effects. LMHA affirmatively markets its sites in a variety of venues and periodicals to ensure that the public is aware of the availability of LMHA housing. LMHA treats all applicants in a non-discriminatory manner. LMHA also monitors its waiting lists to determine if there are significant changes in the percentage of protected classes and, if there were, would determine whether its affirmative marketing

methods should be modified. Table 10 provides information on LMHA’s waiting lists in the format required by HUD.

i. Waiting List Information Anticipated

Table 10: Waiting List Information Projected for Beginning of FY 2020

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Housing Choice Voucher Program	Community Wide	11,637	Open	N/A
Federal MTW Public Housing Units	Site Based	8,630	Open	N/A
Federal MTW Public Housing Units	Community-Wide	3,165	Open	N/A
Project Based Local Non-Traditional MTW Housing Assistance	Program Specific	0	Open	N/A

Description of any duplication of applicants across waiting lists:

As LMHA maintains separate HCV and Public Housing wait lists, applicants may apply and be on both waiting lists.
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ii. Planned Changes to Waiting List in FY 2020

Waiting List Name	Description of Planned Changes to Waiting List
N/A	N/A

III. Proposed MTW Activities

Activity #2020-1: Rent Simplification

Activity Description

This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) residents. LMHA is re-proposing this activity to include several new rent simplification policies. LMHA has previously received approval and implemented the rent simplification policies outlined below.

- Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – HCV Program
(Formerly Activity #40-2014, approved FY 2015 and implemented FY 2016)

When calculating an HCV participant's Total Tenant Payment (which is based on their annual income), LMHA disregards financial aid exceeding amounts received for tuition and fees for all adult full-time students.

- Elimination of the Mandatory Earned Income Disregard
(Formerly Activity #32-2012, approved FY 2012; implemented in HCV Program FY 2012; and implemented in Public Housing Program FY 2014)

LMHA eliminated the HUD Mandatory Earned Income Disregard from the calculation of total tenant payment for families who are in the Public Housing and HCV programs.

- Standard Medical Deduction
(Formerly Activity #8-2008, approved and implemented FY 2008)

LMHA offers a \$1,600 standard medical deduction to eligible disabled and elderly HCV and Public Housing families. The standard medical deduction is flexible in that if the families' health care costs exceed the \$1,600 exemption, the family can choose to have their expenses itemized.

- Earned Income Disregard for Elderly Families
(Formerly Activity #6-2008, approved and implemented FY 2008)

LMHA provides a \$7,500 earned income disregard to elderly families whose only other source of income is their Social Security entitlement. Under the re-proposed rent simplification activity, in addition to applicable HCV/Project Based Voucher (PBV) families, LMHA will extend this income disregard to elderly public housing families who have earned income and whose only other source of income is their Social Security entitlement.

Under the re-proposed rent simplification activity LMHA will use MTW flexibility to implement the changes outlined below. All the changes below, except for the payment standard policy, will be applied to both HCV, including PBV families, and Public Housing.

- Asset Policy

LMHA will revise requirements for the verification and calculation of asset income. Verifying and calculating assets consumes a substantial amount of staff time while the resulting income is generally not significant enough to greatly impact rent. Under existing HUD regulations, self-certification of

assets and income is valued up to \$5,000 is permitted. Specifically, LMHA will make the following revisions to the existing asset policy:

- Self-certification of assets valued up to \$50,000. When the market/face value of assets is up to \$50,000 LMHA will accept a self-certification of asset value and income.
 - When the market/face value of a family's assets is over \$50,000, regulatory HUD verification requirements will be required.
 - Exclusion of income from assets where the asset value is up to \$50,000.
 - For assets with market/face value more than \$50,000, LMHA will calculate asset income by taking the market/face value and multiplying that value by the established passbook savings rate.
- Exclusion of Full-Time Student Income

Currently, under existing HUD regulations, all but \$480 of earned income is excluded for full time students. LMHA will use its MTW flexibility to exclude all full-time student earned income. This income exclusion applies to full-time students other than the head of household, co-head and spouse. Where income is fully excluded, LMHA will not verify the income; however, qualification for the income exclusion will be verified.

- Exclusion of Adoption Assistance Payments

Currently, under existing HUD regulations, all but \$480 of adoption assistance payments is excluded from the calculation of income. LMHA will use its MTW flexibility to exclude all adoption assistance payments. Where income is fully excluded, LMHA will not verify the income; however, qualification for the income exclusion will be verified.

- Application of Payment Standards

Using its MTW flexibility, LMHA will apply the payment standard in effect on the effective date of the regular recertification, regardless of any fluctuation in the payment standard from year to year. During an interim recertification, LMHA will apply the payment standard used at the last regular recertification; however, LMHA will apply the current payment standard for elderly/disabled households on triennial recertification cycles who have interim recertifications related to increases in contract rents. Where the payment standard in effect at the time of the applicable interim recertification reflects a decrease when compared to the payment standard applied at the last regular recertification, LMHA will not update the payment standard at the interim recertification and will wait until the next regular recertification to update the payment standard.

Statutory Objective

By streamlining the rent calculation process and providing income disregards to families, this activity addresses the statutory objectives to reduce costs and achieve greater cost effectiveness in federal expenditures and gives 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. LMHA anticipates several positive outcomes because of continuing existing policies and broadening the scope, including, but not limited to:

- Providing income disregards, which enable families to increase savings;
- A reduction in errors in the calculation of asset income and application of payment standards;
- Reduction in staff time spent on verifying asset income, full time student income and adoption assistance payments; and,
- Encouraging household members who are full-time students to also be employed without the disincentive of having some of their earned income included in the family's subsidy calculation.

Implementation

LMHA will work with its software vendor to program rent calculation changes upon approval from HUD. The Agency expects to be able to implement the revised rent simplification policies within a year of approval.

Metrics

Baselines and benchmarks have been reset to reflect FY 2019 as the baseline and the anticipated change for FY 2020 as the benchmark. LMHA will utilize internal reporting systems to collect and analyze data on the number of households impacted, estimated time savings and the financial impact for participants and LMHA.

<i>COST EFFECTIVENESS (CE) #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	Total Cost of Task: \$304,888 Hourly Rate: \$28.16 Number of hours per recertification: 1 Total number of regular recertifications: 10,827	Total Cost of Task: \$152,458 Hourly Rate: \$28.16 Number of hours per recertification: 1 Total number of regular recertifications: 5,414		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours - decrease	Total time to complete task: 10,827 hours	Total time to complete task: 5,414 hours		

	Number of hours per recertification: 1	Number of hours per recertification: 1		
	Total number of regular recertifications: 10,827	Total number of regular recertifications: 5,414		
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage – decrease)	Not Tracked	5%		
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	PH: \$562,364 HCV: \$2,181,057	PH: \$573,611 HCV: \$2,224,678		
*Total monthly TTP used for PH and HCV.				
CE #6: Reducing Per Unit Subsidy Costs for Participating Households*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	\$592	\$580		
*Average Total HAP				
SELF SUFFICIENCY (SS) #1: Increase in Household Income*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	PH: \$19,340 HCV: \$17,635	PH: \$19,727 HCV: \$17,988		
*Average earned income for those with earned income.				
SS #3: Increase in Positive Outcomes in Employment Status*				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?

Employed Full- or Part-Time	PH: No. Employed: 531 % Employed: 20% HCV: No. Employed: 2,457 % Employed: 30%	PH: No. Employed: 542 % Employed: 20% HCV: No. Employed: 2,506 % Employed: 31%		
Enrolled in an Educational Program	Not tracked	Not tracked		
Enrolled in a Job Training Program	Not tracked	Not tracked		
Unemployed	PH: No. Unemployed: 2,141 % Unemployed: 80% HCV: No. Unemployed: 5,698 % Unemployed: 70%	PH: No. Unemployed: 2,098 % Unemployed: 80% HCV: No. Unemployed: 5,584 % Unemployed: 69%		
<i>*LMHA does not track education and job training participation for participants who are not enrolled in FSS.</i>				
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	PH: 69 HCV: 413	PH: 68 HCV:405		
SS #5: Households Assisted by Services that Increase Self Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	N/A	N/A		
<i>*There are no services associated with this activity.</i>				
SS #8: Households Transitioned to Self Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	PH: 302 HCV: 1,364	PH: 308 HCV: 1,391		
<i>*Self-Sufficiency is defined as being employed and having earned income equal to or exceeding \$14,500.</i>				

Cost Implications

LMHA has completed an impact analysis to identify the financial impact to LMHA and to participants when applying these revised rent simplification policies (see Appendix A). The average rent decrease related to the asset policy is \$12 for Public Housing (PH) and \$6 for Housing Choice Voucher (HCV). The average rent decrease related to the exclusion of all FT student income is \$11 for PH and \$12 for HCV. LMHA software does not separately delineate adoption assistance payments for all programs. Accordingly, an impact analysis for adoption assistance payments could not be completed. LMHA forecasts that approximately 120 families will be positively impacted by the proposed changes to the rent policies while the cost to LMHA is forecasted at under \$10,000.

The cost implication, to LMHA and the tenant, for the payment standard policy is not impactful. Under LMHA's current policy, owners generally request rent increases every year in concert with the family's regular recertification. At that time both the payment standard and contract rent are updated. Under the proposed MTW payment standard policy under rent simplification, regular recertifications for elderly/disabled households on fixed incomes will occur on a triennial basis. Allowing a payment standard update at interim recertifications for contract rent increases for elderly/disabled households on fixed income does not represent a change in cost in that annual increases in contract rent and payment standard are the current practice.

Need/Justification for MTW Flexibility

This activity requires waiver of 24 CFR 5.603, 5.611, 5.628, 5.634, 960.255, 960.257, 982.503, 982.505, 982.516 and 982 Subpart E as allowed under the MTW Agreement, Attachment C, paragraph C. 4., C. 11., and Attachment C, paragraph D. 2. a. and D. 3. b. Current regulations stipulate what is included and excluded in the calculation of income and adjusted income. Waivers of these regulations are necessary to implement, modify or eliminate the full-time student, adoption assistance, earned income disregard, asset income, earned income disregard for elderly, medical expense deduction and financial aid disregard policies. Additionally, waiver of the regulations regarding payments standard protection is needed to implement the policy on application of the payment standards when the payment standard decreases from one regular recertification to the next.

Rent Reform Activities

Impact Analysis

LMHA has completed an impact analysis to illustrate the impact to rent roll, Housing Assistance Payments (HAP) and participant rent when applying the rent simplification policies (see Appendix A). Each of the newly proposed rent simplification changes has a rent lowering impact on participants. LMHA will conduct impact analyses on an annual basis in concert with the MTW Report.

Hardship Case Criteria

As six of the eight rent simplification policies have a potential to decrease tenant rent, no hardship policy is needed. LMHA, in a previously approved MTW Plan had already eliminated the Earned Income Disregard (EID) and as of FY 2020 all participants who had an EID in place have completed the term of the EID. Where LMHA will apply the payment standard in effect at the regular recertification regardless of fluctuations from one recertification to the next, LMHA will allow participants to request a hardship when and if the application of this policy results in a rent increase of more than \$100. In such a case,

LMHA will review hardship requests and upon approval may phase in the increase over a two-year period. Participants will be instructed as to the request and review process for hardships.

Annual Reevaluation

As required, LMHA will conduct an annual evaluation of the rent reform initiative as part of its Annual MTW report. The evaluation will address any mitigating negative impacts and unintended consequences.

Transition Period

As the overall impact of these policies is a potential reduction in tenant rent, LMHA will begin implementation of these policies in FY 2020 as part of the regular recertification process. LMHA will prepare and send a notice to all participants outlining the rent simplification policies and include applicable hardship information.

Activity #2020-2: Streamlined Flat Rent

Activity Description

This activity applies to Public Housing (PH) residents. In FY 2020, LMHA intends to revise the policy under which flat rents are updated as well as the policy for completing flat rent updates for families on flat rent. Under existing HUD regulations, flat rents must be set at no less than 80% of the applicable Fair Market Rent (FMR). FMRs must be reviewed annually and flat rents revised as needed; however, if the FMR goes down, flat rents do not have to be adjusted. Additionally, HUD requires that flat rent updates be completed annually for families on flat rent. The annual review of flat rents, public notice process and flat rent update transactions carry an onerous administrative burden. Often, errors result from incorrect application of updated flat rents.

Using MTW flexibility, LMHA will update flat rents every 5 years from the date of the last change; however, if the average FMR for all bedroom sizes increases more than 5% in any given year, LMHA will update the flat rent schedule and complete flat rent updates for families on their respective anniversary dates. In the absence of changes to the flat rent schedule, LMHA will not complete flat rent update transactions for families paying flat rent. Finally, where a flat rent family has a full recertification due, LMHA will apply the flat rent from the schedule in effect at the time of the full recertification.

Statutory Objective

This activity addresses the statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures by reducing the amount of time spent by staff on flat rent activities. LMHA projects that implementing a new flat rent policy will result in administrative efficiencies for staff.

Implementation

LMHA will implement this policy upon approval of the plan and will apply the policy at each update to the Fair Market Rents.

Metrics

LMHA will utilize internal reporting systems to collect and analyze data on the number of households impacted, estimated time savings and the financial impact for participants and LMHA.

<i>COST EFFECTIVENESS (CE) #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total Cost: \$4,844 Average hourly rate: \$28.16 Time spent to complete a flat	Total Cost Year 1 assumes no updates needed: \$0 Average hourly rate: \$28.16		

	rent update: 1 hour Number of households on flat rent: 172	Time spent to complete a flat rent update: 0 hour Number of households on flat rent: 172		
CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total Time to complete flat rent updates: 172 hours Time spent on each flat rent update: 1 hour Number of households on flat rent: 172	Total Time Year 1 assumes no updates needed: 0 hours Time spent on each flat rent update: 0 hour Number of households on flat rent: 172		
CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Not currently tracked	5%		
CE #5: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	Avg. tenant rent for households on flat rent \$615	\$615		
*LMHA does not anticipate that this activity will result in an increase in agency rental revenue. The savings for this activity are generated through the administrative efficiency.				

Cost Implications

LMHA completed an analysis of FMR annual changes over the past four years. Since 2016, FMRs for the Louisville HUD Metro FMR Area have not increased 5% or more annually. Additionally, the FMRs decreased between 2016 and 2017, and when there is a decrease in FMRs, HUD does not require housing authorities to decrease their flat rents. The cost over a five-year period to LMHA is approximately \$216,732 and the average savings per tenant over a five-year period is \$1,372 (see Appendix B for a detailed impact analysis).

	2019	Δ 2018 - 2019	2018	Δ 2017 - 2018	2017	Δ 2016 2017	2016	Avg. of Annual % Change	% FMR change from 2016 to 2019
Efficiency	602	4.2%	578	4.9%	551	0.0%	551	3.0%	9.3%
One BR	688	4.9%	656	4.3%	629	-2.3%	644	2.3%	6.8%
Two BR	853	3.9%	821	3.5%	793	-2.9%	817	1.5%	4.4%
Three BR	1,158	3.5%	1,119	3.1%	1,085	-3.4%	1,123	1.1%	3.1%
Four BR	1,307	3.8%	1,259	2.4%	1,230	-3.5%	1,275	0.9%	2.5%

Need/Justification for MTW Flexibility

This activity requires waiver of 24 C.F.R. 5.603, 5.628, 5.634 and 960.255 as allowed under the MTW Agreement, Attachment C. paragraph C.11. Under existing HUD regulations, flat rent must be set at 80% of the established Fair Market Rent and must be updated annually. Additionally, families paying flat rent are required to complete an annual update of family composition and rent. Waiver of these regulations is needed to implement this MTW activity.

Rent Reform

Impact Analysis

LMHA has completed an impact analysis on the proposed changes related to flat rents. The impact analysis assumes an average change in flat from one year to the next (see Appendix B). LMHA will review this activity and financial impacts on an annual basis.

Hardship Case Criteria

As this activity poses no hardship on families, hardship criteria have not been included. LMHA will retain flat rents for a five-year period unless the FMR increases by 5% or more. Under the regulations and as retained by LMHA, families on flat rent can still request a change to income-based rent at the time of flat rent update, regular recertification and/ or upon hardship.

Annual Reevaluation

LMHA will review its flat rent policy annually and determine the impact of this flat rent update policy.

Transition Period

LMHA will provide all families with information on the new flat rent policy and related recertification/update requirements at the time of their next regular recertification or flat rent update.

Activity #2020-3: Local Forms

Activity Description

This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) residents. Under this initiative, LMHA will develop local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies and address local housing market features. LMHA plans to develop local versions of the Project Based Voucher (PBV) Housing Assistance Payment (HAP) contract, the Family Self-Sufficiency (FSS) Contract of Participation and Individual Training and Services Plan, the Request for Tenancy Addendum, the Tenant Based HAP Contract, and the Privacy Act Notice. Where the Privacy Act Notice is concerned, LMHA will extend the expiration from 15 months to 36 months to accommodate the biennial and triennial recertification cycles. Any changes to the HAP form will be submitted to HUD for review and will include language noting that funding for the contract is subject to the availability of appropriations and other required provisions identified by HUD. Development of any local form must meet all applicable HUD requirements.

Statutory Objective

This activity addresses the statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures by simplifying forms that are used by program staff and participants.

Implementation

LMHA will begin development of local forms upon approval of the plan. New forms will be rolled out as they are completed.

Metrics

LMHA will utilize internal reporting systems to collect and analyze data on the number of households impacted and estimated time savings related to this activity.

<i>COST EFFECTIVENESS (CE) #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total cost prior to implementation: \$93,322 Contracts executed in FY 2019: 1,657 Time to prepare contracts prior to implementation: 2 hours Average hourly wage: \$28.16	Total cost after implementation: \$46,661 Expected Contracts executed in FY 2020: 1,657 Time to prepare contracts after implementation: 1 hour Average hourly wage: \$28.16		

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total staff time required prior to implementation: 3,314 hours Contracts executed in FY 2019: 1,657 Time to prepare HAP contract prior to implementation: 2 hours	Total staff time required after implementation: 1,657 hours Expected contracts executed in FY 2020: 1,657 Time to prepare contract after implementation: 1 hour		

Cost Implications

Development of local forms will result in cost savings as LMHA will not need MTW contract addendums for PBV, FSS and Tenant Based (TB) program contracts to reflect MTW policies. Cost savings will depend on the volume of activity for leasing, Project Based (PB) contracts and FSS participation.

Need/Justification for MTW Flexibility

This activity requires waiver of 24 C.F.R. 982.162, 982.516 and 24 C. F. R. Part 983 and Part 984 as allowed under the MTW Agreement, Attachment C. paragraph D.1 and D.7 and paragraph E. Under the regulations, certain HUD forms are required for Tenant Based Voucher (TBV) and Project Based Voucher (PBV) leasing and contracts, FSS and release of information. To reflect LMHA’s MTW policies on forms and documents, waiver of these requirements is required.

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-4: FSS Program Enhancements

Activity Description

This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) FSS program participants. LMHA proposes using MTW flexibility to enhance the existing Family Self-Sufficiency (FSS) Program. LMHA anticipates these program enhancements will strengthen the FSS program by improving the retention rate and by increasing participants' long-term economic capacity by providing incentives to encourage participants to complete education and training programs before entering the workforce. LMHA will also use MTW funds to provide support services aimed at empowering families to build savings and financial capabilities as a pathway out of poverty. Enhancements to LMHA's FSS program include:

- Modification of the requirement that an FSS applicant must have an interim or annual recertification within 120 days prior to FSS enrollment. LMHA will use the last completed certification prior to the effective date of the Contract of Participation (COP).
- Opportunity to obtain escrow funds for clients who would otherwise be ineligible for the escrow component of the FSS due to their level of income. LMHA will modify the escrow calculation methodology by calculating FSS credits using the same method for all participants regardless of income level. The method used for very low-income households will apply to all participants.
- Placement of an absolute cap on the amount of escrow regardless of prior FSS participation. The cap, which may be periodically reviewed and updated at LMHA's discretion, will initially be set at \$16,000 per household. Generally, incentive payments count toward the \$16,000 escrow cap.
- Establishment of goal-specific incentive payments when a family attains an established goal. LMHA reserves the right to disburse incentive payments upon final escrow disbursement or at the time of goal completion. Incentives may include, but are not limited to:
 - \$50 for attendance at three FSS meetings within the first four months of enrollment in FSS;
 - \$100 for attending 12 consecutive months of case management meetings;
 - \$150 for completion of a GED or receipt of a high school diploma;
 - \$250 for an Associates Degrees (one-time limit per person); and,
 - \$500 for completion of a bachelor's or master's degree (one-time limit per person).
- Establishment of an incentive payment for FSS graduates who purchase a home within 2 years of completion of the FSS program. The incentive payment amount, which may be periodically reviewed and updated at LMHA's discretion, will be set at \$2,000 per household. To qualify for the homebuyer purchase bonus, the FSS homebuyer must complete an approved Homebuyer Education course. The \$2,000 bonus may be used for a down payment or for post-purchase expenses. LMHA may allow this bonus to be in addition to the \$16K escrow cap.
- Allow existing FSS participants, at the time of implementation of the local MTW FSS program, the right to opt-in to the local MTW FSS program. Existing participants would sign a new FSS COP, which reflects the original enrollment and completion dates, income and earned income, but which includes the MTW FSS program features and requirements. MTW escrow calculations and incentives would apply as of the effective date of the new COP.

LMHA will also develop local versions of the FSS Contract of Participation and Individual Training and Service Plan to reflect the features of its local FSS Program. LMHA anticipates that approximately 115 new participants will join the FSS program in FY 2020.

Statutory Objective

This activity meets the statutory objective of giving 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. The FSS program enhancements provide greater incentives for families to become economically self-sufficient.

Implementation

LMHA will develop implementation plans, software programming changes and marketing materials for these FSS program enhancements in the early part of FY 2020 and anticipates implementation by the close of FY 2020.

Metrics

The metrics below will be compiled using LMHA’s housing software.

SELF SUFFICIENCY (SS) #1: Increase in Household Income*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	PH: 17,346 HCV: \$19,429	PH: \$17,693 HCV: \$19,818		
<i>*Average earned income is calculated for households with earned income.</i>				
SS #2: Increase in Household Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy (increase).	PH: 2,452 HCV: 2,873	PH: 2,501 HCV: 2,930		
<i>*Average amount of savings/escrow for households with savings/escrow.</i>				
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed full-time or part-time	PH: No. Employed: 51 % Employed: 63% HCV: No. Employed: 87 % Employed: 67%	PH: No. Employed: 53 % Employed: 65% HCV: No. Employed: 89 %: Employed: 68%		

Unemployed	PH: No. Unemployed: 30 % Unemployed: 37%	PH: No. Unemployed:28 %: Unemployed: 35%		
	HCV: No. Unemployed: 43 % Unemployed: 33%	HCV: No. Employed: 41 %: Employed: 32%		
Enrolled in Education	PH: 4 HCV: 14	PH: 5 HCV: 15		
Enrolled in Job Training	PH: 1 HCV: 1	PH: 2 HCV: 2		
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	PH: 0 HCV: 6	PH: 0 HCV: 6		
SS #5: Households Assisted by Services that Increase Self-Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	330	330		
<i>*Includes graduates as well as families who received services and who did not successfully complete the FSS program.</i>				
SS #6: Reducing Per Unit Subsidy Cost for Participating Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy (or local non-traditional subsidy) per household affected by this policy in dollars (decrease).	\$574	\$586		
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	PH: \$21,301 HCV: \$48,531	PH: \$21,727 HCV: \$49,502		
<i>*LMHA uses TTP as the household contribution toward housing assistance.</i>				
SS #8: Households Transitioned to Self-Sufficiency *				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	PH: 15 HCV: 31	PH: 16 HCV: 33		
<i>*LMHA defines self-sufficiency as graduation from the FSS program.</i>				

Cost Implications

LMHA projects that the cost of this activity during FY 2020 will be approximately \$1,000. Thereafter, LMHA anticipates that approximately 6% of its FSS families will be eligible for and receive incentive payments of approximately \$4,000 per year.

Need/Justification for MTW Flexibility

This activity requires waiver of Section 23 of the 1937 Act and 24 C.F.R. 984, as allowed under the MTW Agreement, Attachment C, paragraph E. Current regulations require that FSS participants have an interim or regular recertification within 120 days prior to enrollment in the FSS program. Based on experience of other MTW agencies who have imposed a similar policy, this requirement will have no negative impact on either LMHA or residents and will support higher levels of participation by residents. Additionally, using MTW flexibility to provide additional financial incentives for completing goals will result in increased success rates for FSS families.

Rent Reform/Term Limit Information

Not applicable.

Activity #2020-5: Gap Financing

Activity Description

LMHA proposes to utilize MTW flexibility to develop and implement a Gap Financing Program (GFP) for developers using PBVs to create or preserve affordable housing. The GFP will provide LMHA the flexibility to grant capital awards and/or loans to developers who have been awarded PBVs and need additional project funding for development or preservation of affordable housing purposes. Applicants will be required to demonstrate experience in affordable housing development and meet other LMHA eligibility requirements, including but not limited to demonstrating proof of sufficient collateral to cover a default in the loan, demonstrating an acceptable payment history of previous financing, and meeting minimum credit score requirements as defined in LMHA’s underwriting criteria. All awarded developers must pay prevailing wages and meet minority/women/disadvantaged business enterprises (M/W/DBE), where applicable.

LMHA plans to initially use the flexibility to accelerate the development of replacement units for its Russell Neighborhood Choice Neighborhood Initiative (CNI) project. The GFP will also make it more financially feasible for developers, awarded PBVs, to develop and/or preserve affordable housing.

The GFP will be offered in the form of loans with maximum interest rates not to exceed 3%, amortization periods not to exceed 40 years and loans not to exceed \$1M per project, subject to all required approvals. LMHA will not loan more than \$5M per year.

Statutory Objective

By spurring development and preservation of affordable housing, this activity meets the statutory objective of increasing housing choice for low-income families.

Implementation

Upon HUD approval, LMHA is prepared to implement the GFP activity. LMHA intends to issue a Request for Proposal (RFP) for the GFP to determine interest and eligibility of developers and projects.

Metrics

LMHA’s Development Unit will monitor and track the metrics identified below.

<i>HOUSING CHOICE (HC) #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI because of the activity (increase)	PBV: 100	PBV: 100		
<i>HC #2: Units of Housing Preserved</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific	PBV: 100	PBV: 100		

type of household, give that type in the box				
<i>HC #3: Decrease in Wait List Time</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on the wait list in months (decrease)	6 mos.	6 mos.		
<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	0	0		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	PBV: 200	PBV: 200		

Cost Implications

LMHA projects that it will administer gap financing loans upon the implementation of this activity. Therefore, there will not be cost associated with this activity to the agency. Additionally, if loans with interest are issued, LMHA will target interest collected towards the Gap Financing Program.

Need/Justification for MTW Flexibility

LMHA will use the Broader Uses of Funds flexibility provided in its MTW Agreement, Attachment D to implement the GFP.

Rent Reform/Term Limit Information

Not applicable.

IV. Approved MTW Activities

This section of the MTW Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by LMHA. As required, this section also includes summary information on MTW activities that have been not yet been implemented, closed out, or placed on hold by LMHA. Please note that some of the previously approved MTW activities have been renumbered and combined where the authorizations were the same and where the activity features follow similar topics. The revised numbering convention reflects the earliest fiscal year the activity was first included in the MTW Annual Plan, followed by a consecutive number for the activity for that year, i.e. 2008-1, 2008-2, 2008-3. Where activities were combined, the number reflects the earliest fiscal year one of the activities was approved; however, under “Plan Year Approved, Implemented and Amended”, each activity feature includes its own approval, implementation and amendment date.

A. Implemented MTW Activities

Activity #2005-1: Special Referral MTW Housing Choice Voucher Programs *(Formerly Activity #44-2015 and all of the activities in Table 11)*

Plan Year Approved, Implemented, Amended

Table 11 identifies the Plan Year each Special Referral sub-activity was approved, implemented and amended.

Description/Update

Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. LMHA provides housing subsidy to HCV-eligible households, while the partnering agency provides social services support. The provision of services helps families make strides towards self-sufficiency, and the programs increase housing choices for low-income families who might otherwise have difficulty succeeding in the privately managed real estate market.

Families are referred to LMHA by the partner agencies, and program applicants receive an admissions preference for the authority’s HCV Program. Households are required to meet basic HCV eligibility criteria, and the amount of housing assistance each family receives is determined according to traditional HCV Program rules as modified through LMHA’s HUD-approved MTW initiatives.

The voucher recipients participating in some of the agency’s MTW Special Referral Programs are initially required to reside on-site and to meet the partner’s program requirements. However, their voucher resumes full portability after they successfully graduate from the program. As a participant moves from the site, LMHA issues a voucher to the next eligible applicant. For other Special Referral Programs, the voucher is fully portable from the time of admission.

Many of the residential facilities operated by these Special Referral partners are newly constructed or renovated. As such, LMHA has used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HUD Housing Quality Standards (HQS) inspection. This inspection alternative has saved the authority thousands of dollars since Louisville Scholar House first came online in 2008.

Additionally, LMHA may, without prior HUD approval, allocate up to 10 MTW Housing Choice Vouchers to an MTW Special Referral Program for service-enriched, affordable housing programs within the agency's jurisdiction. Eligible programs will offer housing and supportive services targeted to families whose needs are not adequately served elsewhere in the community. Some allocations may be incremental additions to existing Special Referral Programs while others will be allocations to newly established programs.

Table 11: LMHA Special Referral MTW Voucher Programs FY 2020, following the metrics table for this activity, identifies all special referral voucher programs LMHA administers as well as information regarding:

- The year the voucher allocation was proposed;
- The year the voucher allocation was implemented and the number of vouchers allocated;
- A description of the program;
- Whether the vouchers are portable;
- If there is a streamlined admission; and
- What type of inspection applies.

Planned Non-Significant Changes

In FY 2020, LMHA plans to add a new voucher allocation to the Special Referral Program. LMHA will partner with Volunteers of America Mid-States to provide up to 50 HCV vouchers for woman recovering from substance abuse disorders and who are pregnant and/or parenting. Specifically, vouchers will be allocated to women living at Volunteers of America Mid-States' Transitional Living for Woman program, located at program located at 4303 West Broadway or at other scattered-site locations meeting eligibility requirements in Louisville. Vouchers will be fully portable upon approval of our clinical staff so that graduates who relocated from another community to Louisville for treatment may return to their hometowns or otherwise secure the housing moving forward that best meets their needs and supports their long-term recovery.

Planned Changes to Metrics/Data Collection

LMHA updated the following metrics to reflect the additional allocation in FY 2020 and updated the universe of the total voucher allocation:

- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

Note, the updated metrics assume 100% voucher utilization..

Metrics

LMHA tracks the following, combined HUD Standard Metrics for these activities. All Self-Sufficiency metrics for this activity exclude elderly and disabled families. Metrics were not previously tracked for Self Sufficiency #7. FY 2019 was used to reflect the baseline and a benchmark was forecasted for FY 2020. All other baselines and benchmarks remain unchanged.

CE #1: Agency Cost Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0	\$0		
<i>*Implementation of this activity does not modify any LMHA-completed tasks. Housing Authority staff determines applicant eligibility and performs all certifications.</i>				
CE #2: Staff Time Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0 hours	0 hours		
<i>*Implementation of this activity does not modify any LMHA-completed tasks. Housing Authority staff determines applicant eligibility and performs all certifications.</i>				
CE #4: Increase in Resources Leveraged*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$0		
SS #1: Increase in Household (HH) Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of HHs affected by this policy in dollars (increase).	FY 2016: \$4,108	\$4,108		
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full- Time*	As of FY 2016: 90 (32% of 279 HHs)	300 (47% of 638 HHs)		
Employed Part- Time*				
Enrolled in an Educational Program	As of FY 2018: 2 HHs have full-time adult students	2 HHs have full-time adult students		
Enrolled in Job Training Program	Not tracked	Not tracked		
Unemployed	As of FY 2016*: 189 (68% of 279 HHs)	338 (53% of 638 HHs)		
Other	N/A	N/A		
<i>*LMHA does not track part-time vs. full-time employment.</i>				
SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
# Of HHs receiving TANF assistance (decrease).	FY 2016: 54 (19% of 279 HHs)	355 (19% of 638 HHs)		

SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# of HHs receiving services aimed to increase self-sufficiency (increase).	As of FY 2016*: 13 (5% of 279 HHs)	32 (5% of 638 HHs)		
<i>* LMHA tracks FSS participation for this metric. The special referral partner may offer additional self-sufficiency services.</i>				
SS #6: Reducing Per Unit Subsidy Costs for Participating Households (HHs)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 &/or 9 subsidies per HH affected by this policy in dollars (decrease).	As of FY 2016: \$617	\$617		
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	As of FY 2019 \$267	\$272		
<i>*Rental revenue reflects TTP.</i>				
SS #8: Households Transitioned to Self-Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	As of FY 2016: 32 (11% of 279 HHs)	70 (11% of 638 HHs)		
<i>*Self-Sufficiency is defined as the ability of a non-disabled / non-elderly family to obtain suitable employment. "Employment" means the household is receiving earned income. "Suitable" is defined as annual gross earned income equal to or exceeding \$14,500 (the hourly minimum wage as of \$7.25 multiplied by 2,000 hours).</i>				
HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	As of FY 2016: <1 month	<1 month		

Planned Significant Changes

No significant changes are planned.

Table 11: LMHA Special Referral MTW Voucher Programs FY 2020

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
100K Homes Initiative	N/A	2012	2012; 50	Vouchers are allocated to the 100,000 Homes initiative of the Louisville Substance Abuse and Mental Health Services Administration (SAMHSA) Community Consortium. This activity increases housing choices and access to services for up to 50 of the most vulnerable homeless persons on the streets of Louisville Metro. Participants in this Housing First model program, who are identified and referred by the Louisville SAMHSA, must be chronically homeless.	Full portability upon program completion	No	No: Traditional inspection protocol.
Center for Women and Families	Villager	2005	2005; 22	Vouchers are allocated to the Center for Women and Families for long-term transitional housing on their downtown campus. Programs at the Center focus on the elimination of domestic violence, sexual violence, and economic hardship. Voucher utilization has remained 100%. This activity has increased housing choices and the cost effectiveness of federal funds.	Full portability upon program completion	Yes	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and once per year concurrently.
Centerstone	N/A	2015	2015; 50	Vouchers are allocated to Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices and access to services for 50 families referred through Centerstone’s Assertive Community Treatment (ACT) team. Assertive Community Treatment is an Evidenced Based Practice approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) and designed to engage persons with a Severe Mental Illness (SMI) whose needs are not met by traditional outpatient services. Services are delivered in the context and environment where they are needed (i.e. the team goes to the person). The priority population is adults with a severe mental illness who are currently	Full portability upon program completion	No	No: Traditional inspection protocol.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				institutionalized at a personal care home or at risk of being institutionalized because of a lack of adequate community support. Lack of on-site support is one of the primary reasons this priority population has been unsuccessful in achieving sustained psychiatric stability in the past. Assertive Community Treatment fills this gap and assists the program participants in achieving and maintaining community integration. Those persons originally from Jefferson County, but placed in a personal care home in another region of the State, will be considered for return to the Louisville area.			
Choices, Inc.	Choices owned units	2014	2014; 4 2016; 1	Vouchers are allocated to Choices, Inc. to provide permanent supportive housing for homeless families, including case management.	Full portability upon program completion	No	No: Traditional inspection protocol.
ChooseWell Communities	N/A	2016	2016; 10 2017; 60	Vouchers are allocated to ChooseWell Communities' Thrive Program, which assists families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance. In FY 2016, LMHA allocated up to 10 vouchers to this program; this was increased by 60 vouchers in FY 2017. Seventy (70) vouchers are allocated to referrals from ChooseWell Communities.	Full portability upon program completion	No	No: Traditional inspection protocol.
Coalition for the Homeless	N/A (Rapid Re-housing)	2012	2012; 10 2013; 10	Vouchers are allocated to Coalition for the Homeless for homeless families with children.	Full portability upon program completion	No	No: Traditional inspection protocol.
Day Spring	Day Spring units	2009	2012; 4	Vouchers are allocated to households with members who have a severe mental illness, if they initially reside at a Day Spring constructed unit, while they are participating in the program Day Spring, a faith-based	Full portability upon	Yes	No: Traditional inspection protocol.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				charitable organization, which provides residential and supportive services to adults with developmental disabilities who want the opportunity to live independently in a supportive community setting. Under this initiative, not all the residential units are subject to typical HUD HQS and rent reasonableness requirements.	program completion		
Family & Children's Place	N/A	2017	2017; 10	Vouchers are allocated to Family & Children's Place for Olmsted-eligible families participating in the organization's Homeless Prevention Program, which serves families that include at least one individual who is leaving an institution and is also at risk of homelessness. This population includes individuals leaving prison after being paroled or serving out their sentence; individuals who have aged out of foster care; and individuals who have a high rate of hospitalization due to a severe mental illness. Participants receive case management.	Full portability upon program completion	No	No: Traditional inspection protocol.
Family Scholar House	Louisville	2008	2008; 56	LMHA allocates vouchers to a Special Referral Program with Family Scholar House for their Louisville Scholar House facility. These solo heads of households often face multiple barriers to furthering their education and obtaining employment that will provide their families with adequate income to become self-sufficient.	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used. After initial move-in, with new occupant and once per year concurrently.
	Downtown	2010	2011; 54	Vouchers are allocated to the Family Scholar House and Spalding University at the Downtown Scholar House.			
	Stoddard Johnston	2012	2012; 57	Vouchers are allocated to the Family Scholar House for their new Stoddard Johnston Scholar House location.			
	Parkland	2013	2013; 53	Vouchers are allocated to the Family Scholar House at their Parkland Scholar House facility. Vouchers become portable upon graduation.			
	Riverport	2017	2017; 64	Vouchers are allocated to the Family Scholar House's Riverport Scholar House facility.			

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
House of Ruth	Glade House	2018	2018; 10	<p>LMHA will allocate vouchers to the House of Ruth to assist individuals who are homeless and HIV-positive, combining housing with wraparound social service support services, including:</p> <ul style="list-style-type: none"> • A safe, drug and alcohol-free community living environment; • Intensive case management; • Group and individual mental health counseling; • Intensive outpatient substance abuse treatment; • Life skills education; and, • Transportation assistance. <p>Special Referral Program participants will be required to live at the House of Ruth's Glade House, a single-room occupancy facility for two years, after which time vouchers become fully portable. Inspections will be conducted with each new occupant and once per year concurrently.</p>	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Kentucky Housing Corporation	N/A	2016	2016; 10	<p>Vouchers are allocated to the Kentucky Housing Corporation. These vouchers are available to low-income households where a family member meets one of the following criteria:</p> <ol style="list-style-type: none"> 1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals 2. Persons with severe mental illness who are at risk of institutionalization 3. Persons with disabilities exiting nursing homes and intermediate care facilities for individuals with intellectual or other developmental disabilities 	Full portability upon program completion	No	No: Traditional inspection protocol.
St. Vincent DePaul	1015-A S. Preston St.	2018	2018; 10	<p>LMHA will allocate vouchers to St. Vincent DePaul's Transitional Housing Program, which assists families with children, where the family is either homeless or at risk of becoming homeless, combining housing support with case management services. Participants</p>	Full portability upon program completion	No	Yes: Inspection with new occupant and

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				will initially reside at 1015-A S Preston Street; however, vouchers remain fully portable. Inspections will be conducted with each new occupant and once per year concurrently			once per year concurrently.
Wellspring	Youngland Avenue	2012	2012; 5	LMHA will allocate vouchers to households with members with severe mental illness, if they reside at Wellspring's Youngland Ave. facility, while they are participating in the program. Wellspring is a charitable organization that addresses Louisville's need for supportive housing for adults with severe and persistent psychiatric illnesses. Referrals accepted for this initiative are considered to be Mainstream Program participants.	Full portability upon program completion	Yes	No: Traditional inspection protocol.
	Bashford Manor - Newburg	2012	2012; 8	LMHA will allocate vouchers to households with members with severe mental illness, as long as they initially reside at Wellspring's Bashford Manor / Newburg facility, while they are participating in the program. Referrals accepted for this initiative are considered to be Mainstream Program participants.		No	
	N/A	2016	2016; 10	Vouchers are allocated to Wellspring for families with members with severe mental illness who are exiting Wellspring's Ardery House facility for permanent housing. These vouchers are only issued to households that are not eligible for an Olmstead voucher. Wellspring continues to provide case management / peer specialist services to all clients utilizing these vouchers.		No	
Office of Resilience and Community Services – Shelter Works	N/A	2019	2019; 10	LMHA will allocate vouchers to individuals participating in the ShelterWorks program. The Office of Resilience and Community Services (RCS) started the ShelterWorks program, which connects individuals in shelters to intensive wrap around services, training and job connections. As housing is such a basic need, it is anticipated that providing the Housing Choice Vouchers will increase the rate of	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				attainment of self-sufficiency for program participants.			
Home of the Innocents	Home of the Innocents	2019	2019; 10	LMHA will allocate vouchers to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (<i>the Home</i>) is where Louisville's vulnerable children and youth find emotional, physical, and intellectual support that can transform their lives. The Home provides the community with a range of important residential, treatment and community-based programs.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Volunteers of America Mid-States	4303 West Broadway or at other scattered-site locations	2020	2020; 50	LMHA will allocate vouchers to woman recovering from substance abuse disorders and who are pregnant and/or parenting. Specifically, vouchers will be allocated to women living at Volunteers of America Mid-States' Transitional Living for Woman program, located at program located at 4303 West Broadway or at other scattered-site locations meeting eligibility requirements in Louisville.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.

Activity #2006-1: MTW Homeownership Program *(Formerly Activities #3-2006, #13-2009, and #11-2009)*

Plan Year Approved, Implemented, Amended

- Amount and Distribution of HCV Homeownership Assistance: Approved and implemented FY 2006.
- HCV Homeownership Program – Exception Payment Standards: Approved and implemented FY 2009; amended in FY 2017.
- Flexibility in Third-Party Verification for HCV Homeownership: Approved and implemented FY 2009.

Description/Update

LMHA has developed and implemented several MTW policies aimed at expanding homeownership opportunities for low-income families. Following is a description LMHA's MTW homeownership policies.

Using MTW flexibility, LMHA developed and implemented the following policies:

- ***Amount and Distribution of HCV Homeownership Assistance:*** Utilization of a two-bedroom payment standard for all one-bedroom eligible HCV Homeownership households.
- ***HCV Homeownership Program – Exception Payment Standards:*** Adjustment of payment standards for the HCV Homeownership Program to 120% of Fair Market Rent in high opportunity census tracts that LMHA has designated as exception payment standard areas.

Exception census tracts are determined by analyzing 5-Year American Community Survey data published by the U.S. Census Bureau. When this activity was first implemented in FY 2009, an exception census tract was defined as one where the *Owner-Occupied Median Value* was greater than **100%** of the same value for the Metropolitan Statistical Area (MSA) as a whole. Post implementation of this activity, the clear majority of Homeownership Program participants (nearly 90%) were still purchasing houses in non-exception payment standard areas. To boost participants' buying power in areas of opportunity, in FY 2016 LMHA increased the number of exception census tracts by re-defining the criteria to encompass any census tract where the *Owner-Occupied Median Value* exceeded **80%** of the *Owner-Occupied Median Value* for the Louisville MSA as a whole.

- ***Flexibility in Third-Party Verification for HCV Homeownership:*** Once approved for the HCV Homeownership Program, families have eight months to execute and close on a proposed sales agreement. Under this policy, the income verification completed during the program application process is valid for eight months, i.e. staff no longer must re-verify income for families who take more than 60 days to close on a sale.

Planned Non-Significant Changes

While there are no non-significant changes planned, the activity represents a consolidation of the former three homeownership activities.

Planned Changes to Metrics/Data Collection

Baselines and benchmarks were updated to account for the consolidation of activities.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	As of FY 2008: \$179 (12 verifications x 0.5 hours x \$29.78/hour)	\$0		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	As of FY 2008: 6 hours (12 verifications x 0.5 hours)	0 hours		
<i>CE #3: Decrease in Error Rate of Task Execution</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease)	As of FY 2008: Not tracked	N/A (Task no longer conducted)		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	4		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home because of the activity (increase).	0	4		

Planned Significant Changes

No significant changes are planned.

Activity #2007-1: Streamlined Recertification Process
(Formerly Activity #4-2007, Alternate Reexaminations)

Plan Year Approved, Implemented, Amended

Approved FY 2007; implemented in HCV Program FY 2007; implemented Public Housing Program FY 2008; amended FY 2012.

Description/Update

This activity allows LMHA to conduct a re-certification of elderly and disabled families in the Public Housing and HCV programs once every two years instead of annually. This will include households in the Project-Based program.

Currently, biennial recertifications are completed for HCV households where the head, co-head or spouse is elderly or over age 55 and disabled and the only source of income for the household is Social Security (SS) or Disability (SSI). On the off years, HCV families are required to complete a mini-recertification packet, which they return to the agency by mail. In the Public Housing program, each year 50% of elderly/disabled families receive a full recertification of eligibility on the anniversary of their lease-up date.

Planned Non-Significant Changes

In FY 2020, LMHA will implement biennial recertifications for all Housing Choice Voucher (HCV) and Public Housing (PH) households and eliminate the mini recertification process for HCV. Additionally, households whose only source of income is from SS, SSI and/or pension will be recertified once every three years as well as PH households on flat rent. Households who report zero income will be recertified annually. LMHA will implement this process by scheduling one-half of households to complete recertifications on the odd years and the other half on the even years. Households currently on triennial recertifications will generally not have their recertification dates changed. LMHA will further streamline the recertification process by accepting documents that are not more than 120 days old when received by LMHA.

Planned Changes to Metrics/Data Collection

Baselines and benchmarks have been reset to reflect streamlined recertifications for all households.

Metrics

<i>CE #1: Agency Cost Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Total Cost of Task prior to implementation: \$304,888	Total Cost of Task prior to implementation: \$140,997		
	Number of Regular Recertifications PH: 2,672	Number of Regular Recertifications PH: 1,153		

	HCV: 8,155 Time per recertification: 1 hour Hourly rate: \$28.16	HCV: 3,854 Time per recertification: 1 hour Hourly rate: \$28.16		
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**Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications.*

CE #2: Staff Time Savings*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total time to complete the task prior implementation: 10,827 hours Number of Regular Recertifications PH: 2,672 HCV: 8,155 Time per recertification: 1 hour	Total time to complete the task prior implementation: 5,007 hours Number of Regular Recertifications PH: 1,153 HCV: 3,854 Time per recertification: 1 hour		

**Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications*

CE #5: Increase in Agency Rental Revenue*

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	PH: \$210 HCV: \$267	PH: \$214 HCV: \$272		

**Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications. Agency rental revenue represents TTP for both PH and HCV.*

Planned Significant Changes

No significant changes are planned.

Activity #2008-1: Occupancy at Elderly Developments
(Formerly Activities #10-2008 and #23-2010)

To increase occupancy rates at several of LMHA’s elderly/disabled developments, LMHA, using MTW flexibility, developed and implemented leasing incentives and a revised definition of elderly. The following are a description of the MTW policies, which address this important leasing objective.

Plan Year Approved, Implemented, Amended

- Local Definition of Elderly: Approved and implemented FY 2008.
- Lease-Up Incentives for New Residents at Dosker Manor: Approved and implemented 2010.

Description/Update

Local Definition of Elderly

Using MTW flexibility, LMHA has established the following local definition of “elderly”: any family whose head of household, co-head, or spouse is age 55 or above. Under existing HUD regulations, within the Public Housing Program, this definition is only used to determine eligibility for occupancy at the Housing Authority’s elderly/disabled high-rise towers. In all other public housing contexts, “elderly” begins at age 62.

Lease-Up Incentives for New Residents at Dosker Manor

Additionally, LMHA provides lease-up incentives to new residents at Dosker Manor, an elderly/disabled high-rise located in downtown Louisville that was experiencing particularly low occupancy rates. New residents receive a waiver of the initial deposit and the first month is rent-free. The incentives have successfully increased occupancy rates Dosker Manor.

Planned Non-Significant Changes

While there are no non-significant changes to the policies planned for FY 2020, the Activity represents a consolidation of former Activities #10-2008 and #23-2010.

Planned Changes to Metrics/Data Collection

Baselines and benchmarks were updated to account for the consolidation of activities.

Metrics

<i>CE #5: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	\$211,719	\$211,719		

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	0	0		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	105		

Planned Significant Changes

No significant changes are planned.

Activity #2009-1: Streamlined Development and Acquisition *(Formerly Activities #18-2009 and #26-2011)*

LMHA's has implemented several initiatives to streamline the development and acquisition processes. The initiatives result in cost savings to the Agency as well as expedite timelines associated with development and acquisition activities.

Plan Year Approved, Implemented, Amended

- Simplification of the Public Housing Development Submittal: Approved and implemented FY 2009.
- Acquisition of Mixed-Income Sites for Public Housing: Approved and implemented FY 2011.

Description/Update

Simplification of the Public Housing Development Submittal

LMHA has simplified the proposal process for each acquired or developed public housing property. Twice yearly, LMHA submits a six-month report summarizing the agency's acquisition and development activities to the HUD Louisville Field Office. The activity reduces the amount of time staff spends preparing development submittals and reduces the average length of time to close on a property.

Acquisition of Mixed-Income Sites for Public Housing

LMHA also used MTW flexibility to revise the acquisition process. The revised policy authorizes LMHA to acquire units for public housing or vacant land for developing public housing without prior HUD authorization if HUD does not respond to LMHA's request for authorization within 10 days of the submittal date. Acquired properties must meet all of HUD's other requirements, including site selection requirements.

While the policy was proposed and implemented in the FY 2011 Plan, LMHA has not utilized the flexibility to date. LMHA will utilize the regulatory flexibility provided by this activity if HUD has not responded to LMHA's request for authorization within 10 days of the submittal date. Where applicable, LMHA will use this MTW authority in FY 2020.

Planned Non-Significant Changes

In FY 2020, LMHA plans to extend the scope of this activity to include acquisition of sites and/or units for PBV development and/or preservation as well as public housing mixed income sites.

In addition to the extended scope of the acquisition policy, the activity represents a consolidation of former Activities #18-2009 and #26-2011.

Planned Changes to Metrics/Data Collection

Baselines and benchmarks were updated to account for the consolidation of activities.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	As of FY 2008: \$12,249 (9 submittals x 25 hours x \$54.44/hour)	\$930 (2 submittals x 7.5 hours x \$62.00/hour)		
<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	As of FY 2008: 225 hours (9 submittals X 25 hours)	15 hours (2 submittals x 7.5 hours)		
<i>HC #1: Additional Units of Housing Made Available</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI because of the activity (increase)	0	10		

Planned Significant Changes

No significant changes are planned.

Activity #2011-1: Housing Choice Voucher Child Care Deductions Policy (Formerly Activity #27-2011)

Plan Year Approved, Implemented, Amended

Approved and implemented in FY 2011.

Description/Update

This activity allows for the deduction of verified ongoing child-care expenses from a working household's gross income when determining income eligibility. To qualify for the adjustment, the family must include a head of household, co-head, and/or spouse with a demonstrated work history for a period of 12 months or longer. While this activity was designed to increase housing choice for working families with children who may be struggling to make ends meet, LMHA has determined that it also achieves the HUD Standard metrics of "Reducing the per Unit Subsidy Costs" for participating households and "Increases Agency Rental Revenue." LMHA anticipates that this policy will remain enforced in FY 2020.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Metrics were not previously tracked for SS #7. FY 2019 data was used to establish the baseline and a benchmark was forecasted for FY 2020. All other metrics remain unchanged.

Metrics

<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	As of FY 2010: No HHs affected by policy	\$542		
<i>SS #7: Increase in Agency Rental Revenue*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	As of FY 2019** \$267	\$272		
*Total tenant payment. **2019 was the first year that a baseline for this metric was established.				

Planned Significant Changes

No significant changes are planned.

Activity #2014-1: Public Housing Sublease Programs *(Formerly Activities #37-2014 and #29-2015)*

Plan Year Approved, Implemented, Amended

- Accessible Units Sublease Agreement with Frazier Rehab Institute: Approved and implemented FY 2014.
- Public Housing Sublease Agreement YouthBuild Louisville: Approved and implemented FY 2015.

Description/Update

Using MTW flexibility LMHA has developed and implemented sublease programs. The programs use public housing units for temporary housing for specific populations in need. Specifically, LMHA currently subleases units to the following organizations:

- ***Frazier Rehab Institute***
Fully accessible units are subleased as temporary housing for Spinal Cord Injury (SCI) out-patients of Frazier Rehab Institute. The units are transitional housing provided for up to six months per family. Frazier Rehab Institute is responsible for verifying that the family is eligible to live in the unit (e.g. a program participant, household income is at or below 80% AMI). Frazier Rehab leases the apartments from LMHA and pays the cost of all utilities. Rent to Frazier Rehab is set at \$210 per month (or roughly 30% of monthly SSI for one person) and Frazier Rehab has agreed to pass on no more than 100% of the rent plus utilities to the tenant (the sub lessee). Frazier Rehab uses a modified version of LMHA's public housing lease as its tenant sublease. Frazier Rehab also refers sub lessees to area service providers, including the Center for Accessible Living (Kentucky's first Independent Living Center), which can assist households with leaving the program.

Frazier Rehab has established a hardship policy to define circumstances under which households may be exempted or temporarily waived from the rent Frazier Rehab may charge to the sub lessee. Examples could include involuntary loss of income or unexpected medical expenses.

- ***YouthBuild Louisville***
YouthBuild Louisville (YBL) subleases public housing units to provide temporary housing for low-income YBL participants who are experiencing homelessness. LMHA subleases up to three 2-bedroom apartments for the use of YBL participants (and their families) and facility space for the YBL program. Units are provided to YBL on an as needed basis. This activity uses public housing as an incentive for young people to enroll in the YBL job-training program, which increases their chances of becoming self-reliant.

For each month a unit is occupied by an YBL program participant, YBL pays LMHA \$60. YBL certifies that students are income eligible upon entry to the YBL program through the application process and follow-up verification through local and state subsidy programs. The participant and their household may continue to live in the unit if they are active in the YBL program. Upon graduation, the household may elect to receive preference for a public housing unit.

All participants residing in the subleased public housing units must meet basic Public Housing Program eligibility criteria (no outstanding rent balance with LMHA or other public housing authority, criminal background check, age 18 or older). LMHA staff verifies that the YBL program participant is eligible for this MTW initiative.

LMHA anticipates utilizing 2 units for each program in FY 2020. However, if there is demand for another unit from YBL, LMHA may dedicated an additional third unit to the program.

Planned Non-Significant Changes

While there are no non-significant changes planned, the activity represents a consolidation of two former activities.

Planned Changes to Metrics/Data Collection

Baselines and benchmarks were updated to account for the consolidation of activities.

Metrics

<i>CE #2: Staff Time Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0 hours	N/A		
<i>*There are no staff savings associated with this activity</i>				
<i>SS #1: Increase in Household Income*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome*	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	0	N/A		
<i>*Clients in these programs are not expected to have an increase in income. Frazier clients have spinal injuries and are unable to work and YBL participants receive a stipend and do not receive wage income.</i>				
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Employed Full-Time	As of FY2014: 0	0		
Employed Part-Time	As of FY2014: 0	0		
Enrolled in an Educational Program	As of FY2014: 0	1		
Enrolled in a Job Training Program	As of FY2014: 0	1		
Unemployed	As of FY2014: 0	1		
Other	N/A	N/A		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	As of FY 2014: 0	4		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	As of FY 2014: 0	4		
<i>*Self-Sufficiency is defined as a participant exiting the program for any other reason than termination of subsidy/participation.</i>				
HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).	As of FY 2013: 0	4		
HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	As of FY 2014: 0	4		

Planned Significant Changes

No significant changes are planned.

Activity #2014-2: Housing Choice Voucher Program Rent Increase Limit (Formerly Activity #39-2014)

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

Under this MTW activity, LMHA places a 2% cap on annual contract rent increases for units where the tenant is already receiving Housing Choice Voucher (HCV) rental assistance. At contract renewal, LMHA limits the landlord's requested rent to whichever is least: 102% of the previous contract rent for the same tenant or the (exception) payment standard.

Under this activity, LMHA conducts reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. LMHA uses the SEMAP sample size requirements to dictate the number of RR determinations to be completed and has established the universe as the number of units with requested rent increases. If the rent on more than 20% of sampled units, because of application of the policy, is not reasonable when compared with the RR determination, LMHA will conduct RR determinations on double the initially established sample size. LMHA will monitor outcomes and may modify this policy to ensure rents are reasonable, i.e. revise sample size requirements

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Metrics were not previously tracked for SS #7. FY 2019 data was used to establish the baseline and a benchmark was forecasted for FY 2020. All other metrics remain unchanged.

Metrics

<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	As of FY 2014* \$526	\$542		
<i>*FY 2014 is the earliest year for which data is available.</i>				
<i>SS #7: Increase in Agency Rental Revenue*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	As of FY 2019** 267	\$272		
<i>*Total tenant payment. **2019 was the first year that a baseline for this metric was established.</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2015-1: HCV Program - HUD/MDRC Rent Reform Demonstration (Formerly Activity #43-2015)

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2015.

Description/Update

LMHA was selected to participate in a HUD-commissioned six-year study to evaluate an alternative HCV rent reform policy (the “Study”). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that have been implemented at several public housing authorities across the country, to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency;
- Simplify the administration of the HCV Program;
- Reduce housing agency administrative burden and costs;
- Improve accuracy and compliance of program administration;
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under current rules; and,
- Improve transparency of the program requirements.

The Control Group vouchers are being managed using the LMHA’s standard policies. The Alternate Rent Group rent policy includes the following features:

- A revised formula to calculate tenant share of rent and utilities at 28% of gross annual income
- A minimum rent payment from tenants to owners of \$50
- A revised method for determining gross annual income
- Elimination of deductions and allowances
- A disregard of income from assets valued below \$25,000
- A triennial recertification procedure
- A limited number of interim re-certifications per household per year
- A revised methodology for determining tenant rent to owner
- A simplified utility allowance schedule
- A hardship policy to protect tenants from excessive rent burden

Only vouchers administered under the MTW Program are eligible for the Study; however, households receiving a biennial certification are also excluded. The Study is focused on work-able populations and does not include elderly households, disabled households, or households headed by people older than 56 years of age (who will become seniors during this long-term study). Households utilizing the childcare expense deduction for purposes of determining adjusted annual income, as well as households participating in Family Self-Sufficiency and Homeownership programs, were not eligible for Study selection. In addition, households that contain a mix of members: 1) with an immigration status that is eligible for housing assistance, and 2) with an immigration status that is non-eligible for housing assistance, are not included in the Study. Finally, households receiving case management or supportive services through one of the Housing Authority’s MTW Special Referral Programs are also excluded from the Study.

Households selected for the Alternate Rent Group met with an LMHA Housing Specialist to review the Study and their specific calculation of Total Tenant Payment under both the traditional and Study policies. They then had a period of 30 days to consider whether to select to be excluded from the Study. Study enrollment was completed in December 2015. In FY 2020, because of households leaving the program, it is anticipated that the Alternate Rent Group will have 580 households and the Control Group will have 672 households. The study is scheduled to end in 2021.

The Study offers appropriate hardship protections to prevent any Alternate Rent Group member from being unduly impacted including:

- If the household has a decrease in annual income, the household may request an interim re-certification or other remedies under the hardship process;
- If the limit on interim certification presents a hardship, the household can apply for a Hardship Exemption; and,
- Where minimum rent to owner exceeds 40% of the household current anticipated gross income, the household may request a Hardship Waiver.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

Baselines have not changed; however, benchmarks were updated to reflect the participation levels in the control and treatment groups for FY 2020. Where the metric for SS #7 was not previously tracked, LMHA is using the Total Tenant Payment (TTP) for FY 2019 as the baseline and establishing benchmarks for FY 2020.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Cost Per Annual Certification</i> Total cost of task in dollars (decrease).	<p>As of FY2015:</p> <p>Alt Rent Group: \$54,920 (1 annual cert x 1,000 households x \$54.92/cert)</p> <p>Control Group: \$54,920 (1 annual cert x 1,000 households x \$54.92/cert)</p> <p>Per annual cert cost: \$54.92 (\$50.14 staff cost (2 hours x</p>	<p>Alt Rent Group (Non-Triennial Cert Years): \$0 (0 certs x \$0 per cert)</p> <p>Alt Rent Group (Triennial Cert Years): \$35,438 (580 certs x \$61.10)</p> <p>Control Group (All Years): \$41,059 (672 certs x \$61.10)</p>		

	\$25.07/hour) + \$4.78 (mail + reproduction costs))	Cost per annual cert: \$61.10 (\$56.32 staff cost (2 hours x \$28.16/hour) + \$4.78 (mail + reproduction costs))		
Cost per Full Interim Certification* Total cost of task in dollars (decrease).	As of FY2015: Alt Rent Group: \$75,220 (2 interim certs * 1,000 HHs \$37.61/cert) Control Group: \$75,220 (2 interim certs * 1,000 HHs \$37.61/cert) <u>Per interim cert cost:</u> \$37.61 (staff cost of \$25.07/hr. x 1.5 hrs.)	Alt Rent Group: \$12,250 (290 certs x \$42.24/cert) Control Group: \$56,771 (1,344 certs x \$42.24/cert) Per interim cert cost: \$42.24 (staff cost of \$28.16/hour x 1.5 hours)		
Cost per Streamlined Interim Certification* Total cost of task in dollars (decrease).	As of FY2015: Alt Rent Group: \$75,220 (2 traditional interim certs per household x 1,000 households x \$37.61/cert) Per traditional interim cert cost: \$37.61 (staff cost of \$25.07/hour x 1.5 hours)	Alt Rent Group: \$16,333 (580 certs x \$28.16/cert) Per streamlined interim cert cost: \$28.16 (staff cost of \$28.16/hour x 1.0 hours)		
<i>*LMHA is not currently tracking traditional and streamlined interim certifications separately. All interim certifications have been reported as traditional interim certifications.</i>				
Cost of Rent Calculation Total cost of task in dollars (decrease).	As of FY2015: Alt Rent Group: \$25,070 (1,000 households x \$25.07 per rent calculation) Control Group: \$25,070 (1,000 households x	Alt Rent Group (Non-Triennial Cert Year): \$0 (0 rent calculations x \$28.16 per cert) (Triennial Cert Years): \$16,333 (580 rent calculations x 1.0 staff hours x \$28.16/hour)		

	\$25.07 per rent calculation) Per rent calculation cost: \$25.07 (staff cost of \$25.07/hour x 1.0 hours)	Control Group (All Years): \$18,924 (672 rent calculations x 1.0 staff hours x \$28.16/hour)		
Cost to Determine Income from Assets Total cost of task in dollars (decrease).	As of FY 2015: Alt Rent Group: \$13 (2 households (0.22% x 1,000 households) x \$6.27 per asset income determination) Control Group: \$13 (2 households (0.22% x 1,000 HHs) x \$6.27 per asset income determination) Per asset income determination cost: \$6.27 (staff cost of \$25.07/hour x 0.25 hours)	Alt Rent Group (Non-Triennial Cert Years): \$0 (0 household x \$28.16 per staff hour x 0.25 hours) Alt Rent Group (Triennial Cert Years): \$14 (2 households x \$28.16 per staff hour x 0.25 hours) Control Group (All Years): \$14 (2 households x \$28.16 per staff hour x 0.25 hours)		
CE #2: Staff Time Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Time to Complete Annual Certification Total time to complete the task in staff hours (decrease).	As of FY 2015: Alt Rent Group: 2,000 hours (1,000 households x 2.0 hours per annual cert) Control Group: 2,000 hours (1,000 households x 2.0 hours per annual cert)	Alt Rent Group (Non-Triennial Cert Years): 0 hours (0 certs x 2 hours/cert) Alt Rent Group (Triennial Cert Years): 1,160 hours (580 households x 2.0 hours/cert) Control Group (All Years): 1,344 hours (672 households x 2.0 hours/cert)		

<p>Time to Determine Tenant Rent Total time to complete the task in staff hours (decrease).</p>	<p>As of FY 2015: Alt Rent Group: 1,000 hours (1,000 households x 1.0 hours per tenant rent determination) Control Group: 1,000 hours (1,000 households x 1.0 hours per tenant rent determination)</p>	<p>Alt Rent Group (Non-Triennial Cert Year): \$0 (0 rent calculations x 1 hour/determination) (Triennial Cert Years): 580 hours (580 determinations x 1.0 hour/determination) Control Group (All Years): 672 hours (672 determinations x 1.0 hour/determination)</p>		
<p><i>*Includes regular recertifications; interim recertifications and hardship requests are excluded.</i></p>				
<p>Time to Determine Utility Allowance Total time to complete the task in staff hours (decrease).</p>	<p>As of FY 2015: Alt Rent Group: 250 hours (1,000 households x 0.25 hours per UA determination) Control Group: 250 hours (1,000 households x 0.25 hours per UA determination)</p>	<p>Alt Rent Group (Non-Triennial Cert Year): \$0 (0 rent calculations x 0.08 hour/determination) (Triennial Cert Years): 46 hours (580 determinations x 0.08 hours per determination) Control Group (All Years): 168 hours (672 determinations x 0.25 determination)</p>		
<p>CE #3: Decrease in Error Rate of Task Execution</p>				
<p>Unit of Measurement</p>	<p>Baseline</p>	<p>Benchmark</p>	<p>Outcome</p>	<p>Benchmark Achieved?</p>
<p>Average Error Rate in Determining TTP Average error rate in completing a task as a percentage (decrease).</p>	<p>As of FY2015: Not tracked</p>	<p>Not determined</p>		
<p>Average Error Rate in Determining Utility Allowance</p>	<p>As of FY2015: Not tracked</p>	<p>Not determined</p>		

Average error rate in completing a task as a percentage (decrease).				
SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	As of FY2016: \$7,195	Alt Rent Group: \$8,285 Control Group: \$6,335		
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome*	Benchmark Achieved?
Employed Full-Time	As of FY 2018: Alt Rent Group: 483 (80% of 604 households) Control Group: 316 (45% of 700 households)	Alt Rent Group: 464 (80% of 580 households) Control Group: 302 (45% of 672 households)		
Employed Part-Time	As of FY 2015: Not tracked	Not Tracked		
Enrolled in an Educational Program	As of FY 2018: Alt Rent Group: 72 households Control Group: 49 households	Alt Rent Group: 72 households Control Group: 49 households		
Enrolled in a Job Training Program	As of FY 2015: Not tracked	Alt Rent Group: Not Tracked Control Group: Not Tracked		
Unemployed	As of FY 2015: Not tracked	Alt Rent Group: 122 (21% of 580 households) Control Group: 403 (60% of 672 households)		
Other	As of FY 2015: Not tracked	Alt Rent Group: 0 Control Group: 0		
*Full-time vs. part-time employment status is not tracked for either Alternate Rent Group or Control Group households. LMHA determines employment as earned income and includes all employment as full time employment.				

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	As of FY 2016: 69 (4% of 1,637 households)	Alt Rent Group: 29 (5% of 580 households) Control Group: 27 (4% of 672 households)		
SS #5: Households Assisted by Services that Increase Self Sufficiency*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	As of FY 2015: Alt Rent Group: 0 (0% of 1,000 households) Control Group: 0 (0% of 1,000 households)	Alt Rent Group: 6 (1% of 580 households) Control Group: 13 (2% of 672 households)		
<i>*Metric captures households enrolled in the Housing Authority's FSS Program.</i>				
SS #6: Reducing Per Unit Subsidy Costs for Participating Households*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	As of FY 2015: \$634/month	Alt Rent Group: \$608/month Control Group: \$628/month		
<i>* Per unit subsidy equals average HAP to Owner.</i>				
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase).	This information was not previously tracked. As of FY 2019 Alt Rent Group: \$275 Control Group: \$267	Alt Rent Group: \$281 Control Group: \$272		
<i>*Total tenant payment.</i>				
SS #8: Households Transitioned to Self Sufficiency*				

Unit of Measurement	Baseline*	Benchmark**	Outcome***	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	As of FY 2016: Alt Rent Group: 161 (22% of 722 households) Control Group: 188 (21% of 915 households)	Alt Rent Group: 128 (22% of 580 households) Control Group: 141 (21% of 672 households)		
<i>*Self-Sufficiency is defined as the ability of a non-disabled/non-elderly family to obtain suitable employment. "Employment" means the household is receiving earned income. "Suitable" is defined as annual gross earned income equal to or exceeding \$14,500 (the hourly minimum wage of \$7.25 multiplied by 2,000 hours).</i>				

Planned Significant Changes

No significant changes are planned.

Activity #2018-1: Beecher Terrace Choice Neighborhood Initiative (CNI) Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing
(Formerly Activity #49-2018)

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2018.

Description/Update

This activity allows LMHA to acquire unsubsidized units for mixed income housing. While the unsubsidized units are outside of Section 8 and Section 9, they are required to serve households whose income does not exceed 80% of Area Median Income (AMI).

LMHA is currently using the flexibility to pursue opportunities to acquire properties where the Housing Authority can provide off-site replacement for its current CNI Grant, awarded for the redevelopment of Beecher Terrace. Specifically, LMHA is seeking to purchase two 4-plexes. Four of the units will be used as Beecher replacement housing and four of the units will be acquired using MTW Broader Use of Funds. These units will be restricted to households with incomes below 80% of AMI, but will not receive direct, ongoing operating subsidy. LMHA Development Corporation (LMHADC) is going to purchase the property. Therefore, HUD approval of the acquisition is not required.

LMHA views the acquisition of the two Russell neighborhood 4-plexes as a pilot project to determine whether this unique approach to the provision of mixed-income replacement housing developments is indeed feasible. Once the agency has “proof of concept,” the Housing Authority plans to pursue additional acquisitions of this nature in furtherance of its CNI Transformation Plan commitments up to a maximum of 110 units.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Metrics

<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease).	As of FY 2017: \$5,460	\$0		
<i>SS #7: Increase in Agency Rental Revenue</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

PHA rental revenue in dollars (increase).	As of FY 2017: \$7,536 (\$1,884 per household X 4 households)	\$33,600 (\$8,400 per household X 4 households)		
HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).	As of 2017: 0	4		
HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	As of FY 2017: 0	4		
CE #1: Agency Cost Savings				
Unit of Measurement	Baseline*	Benchmark**	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	As of FY2017: \$84 (4 households x 0.75 hours per verification x \$28.16 per staff hour)	\$84 (4 households x 0.75 hours per verification x \$28.16 per staff hour)		

Planned Significant Changes

No significant changes are planned.

Activity #2018-2: Increasing Housing Options for Relocating Beecher Terrace Families

(Formerly Activity #50-2018)

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2018.

Description/Update

Given that a large proportion of Beecher households who are being relocated due to a Choice Neighborhood Initiative (CNI) redevelopment project need one-bedroom units, LMHA developed an activity to increase the ability of the Housing Choice Voucher (HCV) Program to absorb additional one-bedroom-eligible households. Specifically, LMHA used MTW flexibility to provide the following two options:

- **Increased Payment Standard for One-Bedroom-Eligible Households** (Relocating Beecher Terrace Households Only): LMHA offers a two-bedroom payment standard to all one-bedroom-eligible households moving from the Beecher Terrace public housing development to an HCV unit in relocation phase II or III. Both the regular two-bedroom payment standard (set at 100% of Fair Market Rent (FMR)) and the increased two-bedroom payment standard offered to families leasing in high opportunity census tracts (set at 110% of FMR) are available to these households.

One-bedroom-eligible families are only permitted to use the two-bedroom payment standard to lease a two-bedroom unit. If a family chooses to lease a one-bedroom unit, they receive the one-bedroom payment standard. Although LMHA does not anticipate any relocating households will select a zero-bedroom unit, should they do so, they will receive the zero-bedroom payment standard.

- **HCV Owner Incentive Fee** (HCV Program-Wide): To encourage owner participation in the HCV Program and increase the inventory of one-bedroom units available to Beecher families relocating within the Louisville Metro area, LMHA pays a \$1,000 incentive fee to owners who lease a one-bedroom unit to a family entering LMHA's HCV Program (to include relocating Beecher families). For the purposes of this activity, a family will be "newly-admitted" and the unit eligible for an incentive fee if:
 - The family is signing a lease under the HCV Program for the first time;
 - The family is moving from one LMHA housing program to another (e.g., moving from the Public Housing Program to the HCV Program);
 - The family is using the portability provisions provided through the HCV Program to move with continued HCV assistance from another Public Housing Agency's jurisdiction to LMHA's jurisdiction; or,
 - The family has experienced an interruption of voucher assistance where the Public Housing Agency formerly assisting the family submitted an End of Participation action to HUD using form HUD-50058 or HUD-50058 MTW.

The incentive fee is paid in two installments of \$500 each, with the first installment paid during the first month of the Housing Assistance Payment (HAP) contract and the second installment paid following the first anniversary of the HAP contract's effective date. Should the HAP contract be terminated for any reason within the first year, the owner will not receive the second \$500 installment.

In FY 2020, LMHA will complete the third phase of Beecher relocation, during which 168 families will be relocated. Of the 168 families, 98 of them currently live in a one-bedroom unit and will most likely utilize the flexibility provided in this activity.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Metrics

<i>HC #3: Decrease in Wait List Time</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	As of FY 2017: 84 months	84 months		
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	132	227		

Planned Significant Changes

No significant changes are planned.

Activity #2019-1: Enhancements to Local Project-Based Voucher (PBV) Program

(Formerly Activities #51-2019 and #48-2018)

Plan Year Approved, Implemented, Amended

- Local Project-Based Voucher (PBV) Program: Approved and implemented FY 2018.
- Enhancements to Local Project-Based Voucher (PBV) Program: Awaiting approval

Description/Update

LMHA proposed, and HUD approved, revised project-based policies to help meet the requirements of LMHA's Beecher Terrace Choice Neighborhood Initiative (CNI) Implementation Grant as well as to provide additional housing choices for low-income households in high opportunity areas, incentivize developers to preserve or create affordable housing units and streamline the administration of PBVs.

Currently, PBV efforts are focused on replacing Beecher Terrace units; however, LMHA plans to utilize flexibilities included in this Activity for the preservation and development of other affordable housing units in the future.

The following MTW flexibilities are included in LMHA's Enhancements to Local Project-Based Voucher (PBV) Program:

- PBV proposals may be selected based on any one of the following three methods:
 - The results of a previous competition (no MTW authority required);
 - Issuance of a Request for Proposals, which may be limited to a specific site or sites or to geographic areas that meet certain criteria (for example, non-impacted census tracts); or,
 - Selection of LMHA-owned properties without a competitive process or prior HUD approval.
- Up to 100% of units within any given project may be awarded PBV assistance. However, in furtherance of the Housing Authority's commitment to the development of mixed-income housing, at its sole discretion, LMHA may limit the percentage of units that may be project-based at any given project to some amount less than 100%.
- When LMHA has received owner notice that the rehabilitated or newly constructed housing is completed, the Housing Authority will inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter a HAP Contract (AHAP), including compliance with Housing Quality standards (HQS), except that in lieu of LMHA inspection of the units, the owner may submit the Certificate of Occupancy issued by Louisville Metro Government as evidence of compliance.
- LMHA will not inspect units at new tenant turnover. LMHA will inspect all units within a specific building concurrently once per year. Should the owner add or substitute a unit covered under the HAP contract, LMHA will inspect the new or substitute unit before assisting that unit. LMHA will also conduct complaint inspections upon tenant request. LMHA may still choose to rely on an alternative inspection process at mixed-finance properties in lieu of an annual inspection. However, LMHA will ensure that all units are inspected at least once per year.

- For determining the order in which families on the Housing Authority’s PBV waiting list are referred by LMHA to the owner of a project-based elderly or elderly/disabled building, an “Elderly Family” will be defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 55 years of age. It may include two or more persons who are at least 55 years of age living together, or one or more persons who are at least 55 years of age living with one or more Live-In Aides.
- The income eligibility limit for PBV units will be increased from 50% to 80% of Area Median Income (AMI) except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd-party funding sources (for example, units that also have low-income housing tax credits or funding awarded through the National Housing Trust Fund). In the case of funding sources that impose an income cap that falls between 50% and 80% of AMI, the maximum allowable income cap will be used. (For example, PBV units that also have low-income housing tax credits capped at 60% of AMI would have an income eligibility limit of 60% of AMI.)
- For PBV units that are also low-income housing tax credit (LIHTC) units, LMHA will utilize the LIHTC program’s Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at recertification.

In addition to the provisions identified above, LMHA submitted and recently received approval of an amendment to its FY 2019 MTW Plan, which included further revisions to the Agency’s PBV Program. LMHA is in the process of issuing a new PBV RFP, which will include the FY 2019 amendment policy changes, including:

- Revised local PBV payment standards that are equal to the greater of 110% of the Metropolitan Area Fair Market Rent (MAFMR) or 110% of the Small Area Fair Market Rent (SAFMR) schedules published annually by HUD.
- Local PBV Program Site-Specific Utility Allowances. LMHA will allow PBV owners to calculate site-specific Utility Allowances in accordance with the provisions of Notice H 2015-04 or successor notices, subject to LMHA’s review and approval prior to implementation.
- Owner Managed Site Based Waiting Lists. This would allow individual owners participating in the LMHA’s Enhancements to Local Project-Based Voucher (PBV) Program to maintain site-based waiting lists. LMHA will determine whether to allow owner-maintained, site-based waiting lists based on LMHA’s assessment of each individual owner’s management capacity. Owners will be required to adhere to fair housing, the Americans with Disabilities Act and other applicable federal guidelines including, but not limited to: providing public notification of waiting list opening and closings; providing community-wide notice of housing availability; providing reasonable accommodations; and, conducting the application process in compliance with LMHA’s Language Access Plan. Subject to LMHA approval, tenant selection preferences may be adopted for individual projects in accordance with LMHA’s Administrative Plan; however, post-revitalization, relocated Beecher Terrace households will continue to receive a lifetime admission preference for all units designated as Beecher Terrace replacement units. Owners will forward applications nearing the top of the waiting list to LMHA, and LMHA will continue to maintain responsibility for eligibility determination. LMHA believes that this alternative MTW policy will expand the range and number of potential Local Project Based Voucher Program units in opportunity neighborhoods.
- Waiver of Independent Entity Requirements for LMHA-Owned Units. This would allow LMHA to directly perform the functions delegated to the independent entity for all LMHA-owned units,

including the following: review of selection process (24 CFR 983.51(e)); unit inspections, exercise of contractual remedies for violation of the HAP contract and the provision of inspection reports to the HUD Field Office (24 CFR 983.103(f)); and, determination of rent to owner, including initial rent (24 CFR 983.301(g) and 983.303(f)). Requiring approval from an independent entity increases costs and creates potential delays in the availability of critically needed replacement housing units, while adding no measurable value to the process. Under this MTW activity, LMHA will process rent determinations, inspections, contract renewal and other necessary program transactions on LMHA-owned units in accordance with the policies and procedures applicable to all other units that are part of LMHA’s Local PBV Program. In the future, LMHA will provide HUD with documentation related to LMHA-owned units upon HUD’s request. Also, LMHA’s transactions will continue to be subject to audit as part of the annual independent audit process.

Planned Non-Significant Changes

In FY 2020, LMHA will implement a non-significant change in PBV site selection standards. LMHA plans to utilize the site selection flexibility provided in its MTW Agreement, Attachment C paragraph D.7.c., which allows for alternate site and neighborhood standards. The requirements set forth in the MTW Agreement, permit existing, newly constructed and substantially rehabbed units receiving subsidy to be located *“in the agency's jurisdiction, including within, but not limited to, the following types of urban areas: (1) an area of revitalization that has been designated as such by the governing jurisdiction, including Redevelopment Areas and Enhanced Enterprise Communities, (2) an area where public housing units were previously constructed and were demolished, (3) a racially or economically impacted area where the agency plans to preserve existing affordable housing, (4) in connection with a HOPE VI or other HUD funded master planned development, (5) in areas where a needs analysis indicates that subsidized housing represents a low percentage of the total number of housing units in the area, or (6) relocating units to an area with a lower concentration of public housing units.”*

Specifically, in FY 2020, LMHA plans to develop and acquire land and existing buildings, where feasible, for Choice Neighborhoods replacement units. Using this MTW flexibility, replacement units may be located on HOPE VI and Choice Neighborhood sites and in census tracts that border the HOPE VI and Choice Neighborhood census tracts. In addition to approval of this provision in LMHA’s MTW Plan, the location of all replacement units will be subject to the offices of the applicable grant (Choice Neighborhoods) approval.

While there are no other non-significant changes planned, the activity represents a consolidation of two former activities.

Planned Changes to Metrics/Data Collection

No changes to metrics or data collection methods are planned.

Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	0	Unit Inspections: \$1,234 using		

		<p>FY2017 staff cost (50 initial inspections for units where LMHA is inspector (as opposed to units where CO is used) x 0.6 hours per inspection x \$41.14 per staff hour)</p> <p>Income/Asset Verification: \$1,126 using FY2017 staff cost (0.4 hours per verification x 100 verifications x \$28.16 per staff hour)</p> <p>Total Savings: \$3,454.40 ((FY 2018 total verification + inspection cost for all PBV units) – (FY2017 total verification + inspection cost for 100 HCV units))</p>		
<p><i>*LMHA received approval for revised PBV policies prior to having any project-based units. Therefore, LMHA did not have costs associated with the activities this MTW PBV program affects. LMHA anticipates that the MTW PBV program will cost less to administer than the traditional PBV program; however, the metrics will not illustrate it.</i></p>				
CE #2: Staff Time Savings				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0	<p>Unit Inspections: 30 hours (50 initial inspections for units where LMHA is inspector (as opposed to units where CO is used) x 0.6 hours per inspection))</p>		

		Income/Asset Verifications: 40 hours (0.4 hours per verification x 100 verifications) Total Savings: 100 hours ((FY 2018 total verification + inspection hours for all PBV units) – (FY2017 total verification + inspection hours for 100 HCV units))		
<i>*LMHA received approval for revised PBV policies prior to having any project-based units. Therefore, LMHA did not have staff time associated with the activities this MTW PBV program affects. LMHA anticipates that the MTW PBV program will take less staff time to administer than the traditional PBV program; however, the metrics will not illustrate it.</i>				
CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	As of FY 2017: \$0	\$19,048,700 (\$190,487 (TDC for a 2-BR walkup) x 100 units)		
HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).	As of 2017: 0	100		
HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	As of FY 2017: 65 months	63 months		
HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	As of FY 2017: 23 households moved (no assistance lost)	130 households moved (no assistance lost)		

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	As of FY 2017: 0	100		

Planned Significant Changes

No significant changes are planned

B. MTW Activities Not Yet Implemented

Activity #2011-2: Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing *(Formerly Activity #28-2011)*

Description/Update

This activity was proposed and approved in FY 2011. It has not yet been implemented. The activity is to explore, using MTW authority, the creation of locally defined guidelines for the re/development, maintenance, and modernization of public housing. LMHA plans to develop reasonable and modest design guidelines, unit size guidelines, and unit amenity guidelines for new and ongoing public housing development activities. The criteria will focus on strategies for developing sustainable housing, preserving affordable housing, and developing low-income housing in low-concentration, non-impacted areas of the agency's jurisdiction. Strategies include rehabilitation and new construction standards that reduce energy consumption, including Energy Star criteria, and that increase the supply of accessible housing in the community.

LMHA anticipated the agency may need the flexibility provided under this activity for Beecher Terrace redevelopment and replacement purposes. Therefore, LMHA proposed the activity well in advance of needing the flexibility so the agency would be well positioned to implement new policies if and when the opportunity arises. As LMHA continues to develop plans for replacement units, the activity may be utilized.

Timeline for Implementation

Planning for this activity will be ongoing during FY 2020 in conjunction with the Housing Authority's Choice Neighborhoods Initiative efforts for the Russell neighborhood and the Beecher Terrace public housing development. As part of this process, LMHA is examining innovative ways to provide one-for-one replacement of the 758 Beecher Terrace public housing units, including the potential use of locally defined guidelines for the development, maintenance, and modernization of public housing. Any locally defined guidelines resulting from the Choice process would be officially proposed to HUD as an amendment to this Plan.

Explanation of Non-Significant Changes Since Approval

There have been no non-significant changes or modifications to this activity since its approval.

C. MTW Activities On Hold

Activity #2010-1 Public Housing Sublease Agreement with Catholic Charities (Formerly Activity #25-2010)

Description/Update

This activity was proposed and approved in FY 2010. The activity was placed on hold in 2012. HUD OGC investigated the use of public housing as emergency housing for victims of human trafficking and found that it was not feasible under MTW to permit families who could not produce valid identification to live in public housing communities.

Plan for Reactivating the Activity

This activity has been tabled. During FY 2020, LMHA will continue to investigate both MTW and non-MTW methods for serving this extremely vulnerable population.

Explanation of Non-Significant Changes Since Approval

No changes have been made since approval.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that LMHA has completed, discontinued, or determined do not require MTW authority to implement.

Table 12: Closed-Out MTW Activities

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
MTW Unit Inspection Protocol (Activity #2-1999)	FY 1999	FY 2018	LMHA used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HQS inspection. Unit inspections of facilities that participate in HUD’s Section 8 Moderate Rehabilitation Program and that are managed by organizations with which the Agency has had a long-term and outstanding relationship, are waived upon initial occupancy and the agency has the authority to conduct inspections once per year concurrently. This activity was closed out since there are no longer any new Mod-Rehab units coming on line and as such, MTW flexibility is no longer needed to allow the certificate of occupancy to suffice for initial move-ins in lieu of a traditional HQS inspection.
Spatial Deconstruction of HCV Assisted Units (Activity #5-2007)	FY 2007	FY 2009	The activity was to limit the concentration of Housing Choice Voucher assisted units in complexes of one hundred or more units to 25% (excluding both elderly/disabled and special referral program sites). This activity was discontinued because of its potential to limit voucher holders’ universe of housing choices.
Public Housing - Term Limits and Employment/Education Requirements for New Scattered Sites (Activity #9-2007)	FY 2007	FY 2016 FY 2017	This activity revised the occupancy criteria for detached, single family, scattered site units to include 5-year residency term limits and employment/education requirements for admission and ongoing occupancy. In 2014, LMHA implemented an admissions preference for qualified three-bedroom eligible families; however, the new preference did not lead to substantial improvement in occupancy levels. Due to continued low occupancy rates at these sites, the activity was revised in FY 2016 to remove the 5-year residency term limit and in FY 2017, LMHA stopped enforcing the employment/education requirements associated with these units and closed out this activity, allowing LMHA to increase occupancy rates.
Explore HUD’s Streamlined Demolition and Disposition Application Process for MTW Agencies (Activity #16-2009)	FY 2009	FY 2014	This activity was never implemented. HUD investigated the possibility of streamlined demolition/disposition activities for MTW agencies but found that it was not feasible under MTW. Out of concern for residents’ rights and the public process, HUD decided that MTW agencies must follow the established procedures for demolition and disposition of property.
Occupancy Criteria Changes for New Scattered Sites – Mandatory Case	FY 2010	FY 2016	This activity revised the occupancy criteria for detached, single-family scattered site units to include mandatory participation in a case management program and movement toward self-sufficiency. Residents moving into

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Management (Activity #21-2010)			one of these units could choose between General Case Management and the Family Self-Sufficiency (FSS) Program. Due to low occupancy rates at these sites, this activity was closed out in early FY 2016.
Increased Flat Rents (Activity #24-2010)	FY 2010	FY 2011	LMHA proposed flat rents for the Agency’s scattered sites be raised and adjusted based on the square footage, location, age and amenities at the property as rent comparables for the site were completed. LMHA decided not to implement this activity and flat rents have since been raised across all the agency’s public housing units to meet HUD’s recent requirement that PHAs set flat rents to at least 80% of FMR.
Rents Set at 30% of Adjusted Income – Public Housing Program (Activity #33-2012)	FY 2012	FY 2014	LMHA proposed that families receiving rental assistance under the Public Housing program would pay either 30% of their monthly adjusted income for rent, or the minimum rent established by the LMHA, whichever was higher. Upon further consideration, because the Housing Authority’s housing stock includes tax credit units, LMHA considered amending the activity to include “ceiling rents” that would vary by bedroom size and that would be set in accordance with the annual tax-credit ceiling rents, as published by the Kentucky Housing Corporation (KHC). KHC is the tax credit allocating agency for the Commonwealth of Kentucky. However, this significant change was never submitted to HUD. Rather, in 2014, LMHA raised flat rents to conform to new HUD regulations mandating that PHAs set flat rents to at least 80% of FMR.
MTW Special Referral Program – Coalition for the Homeless “Move Up” Initiative (Activity #45-2016)	FY 2016	FY 2018	The “Move Up” Special Referral Program in partnership with the Coalition for the Homeless allocates up to 100 vouchers to formerly homeless families, allowing them to transition from homeless services vouchers to HCV vouchers, thus freeing up additional homeless services vouchers to serve currently homeless families. This activity was closed out, since the Housing Authority, with MTW Office concurrence, determined that this partnership can be continued without MTW authority through the provision of a “limited admission preference” to the Agency’s HCV Program.

V. Sources and Uses of MTW Funds

A. Estimated Sources and Uses of MTW Funds

Tables 13 and 14 below provide estimated sources and uses of MTW funds for FY 2020. As LMHA's funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to LMHA and the level of actual expenses. LMHA's estimated Sources and Uses budget for FY 2020 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The tables follow HUD's required formats and do not include information on non-MTW funding sources and uses.

i. Estimated Sources of MTW Funds

Table 13: Estimated Sources of MTW Funding for FY 2020

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$6,004,000
70600	HUD PHA Operating Grants	\$105,750,600
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$229,298
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$346,004
70000	Total Revenue	\$112,329,902

ii. Estimated Uses of MTW Funds

Table 14: Estimated Uses of MTW Funding for FY 2020

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$8,585,625
91300+91310+92000	Management Fee Expense	\$5,350,862
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$584,078
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$7,247,208

FDS Line Item	FDS Line Item Name	Dollar Amount
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$11,310,058
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,059,549
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$685,487
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$235,518
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$5,159,500
97300+97350	Housing Assistance Payments + HAP Portability-In	\$68,085,584
97400	Depreciation Expense	\$4,293,531
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$112,597,000

LMHA's uses for FYE 6/30/20 exceed sources by \$267,098. This is because of depreciation expense of \$4,293,531 in the Uses section of the worksheet for FDS line number 97400. Depreciation expense is a non-cash item (book entry) that is requested on the worksheet but is not really part of LMHA's spending plan for 2020. The depreciation expense of \$4,293,531 is offset by a projected operating surplus of \$4,026,433 (contained entirely in the Section 8 HCV Program). The sum of these two items equals the perceived deficit of \$267,098. However, the apparent deficit is not a true operating deficit, but a deficit resulting only from the estimated depreciation expense that is requested on the budget worksheet.

The multi-year capital plan is included as an appendix to the MTW Plan.

iii. Description of Planned Use of MTW Single Fund Flexibility

Under the MTW Program, LMHA is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are summarized below:

- Approximately \$6,603,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall of \$1,300,000 in the Public Housing Program for calendar year 2019 and 2020, and the continued ability to operate AMPs at a high level and maintain a balanced operating budget. The HUD approved project expense levels (PEL) at some AMPs do not adequately provide for operational services at the level deemed necessary by LMHA.
- Approximately \$1,165,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Central Office Cost Center. COCC revenues have declined in recent years with the reduction in public housing units associated with LMHA's participation in multiple HOPE VI Programs and the CHOICE Program. Although the current fee structure funds basic property management functions that would occur at a traditional PHA, it is not sufficient to pay for all of

the costs associated with MTW activities and the complex tasks and personnel necessary to put together development and financing packages for mixed-finance (HOPE VI) and CHOICE projects.

- Although LMHA has traditionally made transfers to the public housing program from both the CFP program and Section 8 program in past years, the proposed budget year’s transfer is made entirely from the Section 8 program. However, LMHA wishes to retain the authority and flexibility to transfer CFP funds as necessary under current MTW regulations.

Although LMHA utilizes the funding fungibility available in the MTW Program, LMHA adheres to statutes and regulations relative to HUD’s asset management program. All budgeting and reporting within the public housing program are done on an individual site basis, and LMHA utilizes a “fee for service” methodology that charges sites only for the services they receive.

Uses of Reserve Funds

LMHA is currently utilizing and planning to use HUD held project reserve funds in the Section 8 Voucher Program to assist with the following projects:

- Public housing acquisition and development - acquiring new off-site public housing units in non-impacted areas related to the Sheppard Square HOPE VI effort; replacing demolished units at Iroquois Homes; other misc. projects (approx. \$6,000,000).
- To acquire 192 units and retire related debt on a tax-credit project that will reach the end of its tax-credit compliance period (approx. \$1,541,000 [Park Duvalle Phase IV]).
- To supplement the CHOICE grant for neighborhood revitalization of the Russell area, which includes Beecher Terrace Homes (approx. \$29,450,000, includes Porter Paint and Plymouth Apts. activities).
- Renovation and improvements to new Section 8 facility. During FYE 6/30/18, LMHA acquired a new building to house its Section 8 program staff. The old building was deteriorating, and the extensive repairs required were not cost effective. These renovations are to modify the new building for the Section 8 staff that will be permanently housed there (approx. \$1,250,000).

Additionally, reserves are generally necessary to allow for such things as:

- Emergencies and catastrophic events
- Funding shortfalls
- Planned operating deficits
- To provide adequate cash flow when receipt of federal subsidy is delayed
- To increase housing inventory (Section 8 Vouchers)
- To provide gap financing in mixed-finance projects

B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

Yes

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

No

iii. *Has the MTW PHA provided a LAMP in the appendix?*

No

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

Not applicable.

C. Rental Assistance Demonstration (RAD) Participation

i. *Description of the RAD Participation*

Table 15: RAD Conversions Planned in FY 2020

Rental Assistance Demonstration (RAD) Participation
To date, LMHA has not identified specific properties for RAD conversion. In FY 2020 LMHA will continue to evaluate opportunities to convert public housing units under RAD. LMHA will submit all required information to HUD in the event RAD conversions are identified

Table 16: RAD Conversions Completed or Projected to be Completed by the End of FY 2020

Rental Assistance Demonstration (RAD) Participation
LMHA has not completed any conversions under the RAD Program

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

No

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

Not applicable.

VI. Administrative

A. Board Resolution and Certifications of Compliance

The required Board Resolution signed MTW Annual Plan Certifications of Compliance with Regulations is attached in Appendix D.

B. Documentation of Public Process

The Housing Authority's FY 2020 MTW Annual Plan was made available for public comment from March 4, 2019 thru April 2, 2019. Copies of the draft Plan were made available for public review on the Housing Authority's website (www.lmha1.org), at the Authority's central office (420 S. 8th St., Louisville, KY 40203), at the Housing Authority's Section 8 office (801 Vine St., Louisville, KY 40204), and by mail as requested. Resident councils were emailed an electronic copy, as were members of the public who had previously requested to be notified of changes to LMHA policies.

A public hearing was held on March 21, 2019 at 6 PM at Avenue Plaza (400 S. 8th St., Louisville, KY 40203). A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 1, 2019. Approximately 9 people attended the hearing, including LMHA staff, Housing Authority residents, and local housing advocates. Copies of public notices, a summary of comments and responses, and sign-in sheets are attached in Appendix E.

C. Planned and Ongoing Evaluations

LMHA does not have any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities.

D. Lobbying Disclosures

LMHA does not have any lobbying activities to disclose. LMHA has included the Lobbying Activities form (SF-LLL) in Appendix F and Certification of Payments form (HUD-50071) in Appendix G.

VII. Appendices

Appendix A: Rent Simplification Impact Analyses (January 2019)

Public Housing Rent Simplification Impact Analysis
Asset Income Exclusion where Asset Value exceeds \$50,000

	ALL	Elderly/ Disabled	Non-Elderly/ Non- Disabled
# of Households	2,672	1,492	1,180
Annual Total Rent Roll			
Baseline	\$6,879,096	\$4,137,936	\$2,741,160
Proposed	\$6,877,824	\$4,136,952	\$2,740,872
Change	-\$1,272	-\$984	-\$288
Average TTP			
Baseline	\$215	\$231	\$194
Proposed	\$215	\$231	\$194
Change	\$0	\$0	\$0
Change in TTP			
# of Households with No Impact	2,663	1,484	1,179
% of Households with No Impact	100%	99%	100%
# of Households with an Increase	0	0	0
% of Households with an Increase	0%	0%	0%
Average Increase	-N/A-	-N/A-	-N/A-
# of HH with increase from \$1 to \$25	0	0	0
# of HH with increase from \$26 to \$50	0	0	0
# of HH with increase from \$51 to \$75	0	0	0
# of HH with increase from \$76 to \$100	0	0	0
# of HH with increase from \$101 to \$150	0	0	0
# of HH with increase from \$151 to \$200	0	0	0
# of HH with increase from \$201 to \$250	0	0	0
# of HH with increase from \$251 to \$500	0	0	0
# of HH with increase from \$501 to \$1000	0	0	0
# of HH with increase over \$1000	0	0	0
# of Households with a Decrease	9	8	1
% of Households with a Decrease	0%	1%	0%
Average Decrease	-\$12	-\$10	-\$24
# of HH with decrease from \$1 to \$25	9	8	1
# of HH with decrease from \$26 to \$50	0	0	0
# of HH with decrease from \$51 to \$75	0	0	0
# of HH with decrease from \$76 to \$100	0	0	0
# of HH with decrease from \$101 to \$150	0	0	0
# of HH with decrease from \$151 to \$200	0	0	0
# of HH with decrease from \$201 to \$250	0	0	0
# of HH with decrease from \$251 to \$500	0	0	0
# of HH with decrease from \$501 to \$1000	0	0	0
# of HH with decrease over \$1000	0	0	0

Public Housing Rent Simplification Impact Analysis
Exclusion of all Full-time Student Wage Income

	ALL	Elderly/ Disabled	Non-Elderly/ Non- Disabled
# of Households	2,672	1,492	1,180
Annual Total Rent Roll			
Baseline	\$6,879,096	\$4,137,936	\$2,741,160
Proposed	\$6,877,728	\$4,137,336	\$2,740,392
Change	-\$1,368	-\$600	-\$768
Average TTP			
Baseline	\$215	\$231	\$194
Proposed	\$215	\$231	\$194
Change	\$0	\$0	\$0
Change in TTP			
# of Households with No Impact	2,662	1,488	1,174
% of Households with No Impact	100%	100%	99%
# of Households with an Increase	0	0	0
% of Households with an Increase	0%	0%	0%
Average Increase	-N/A-	-N/A-	-N/A-
# of HH with increase from \$1 to \$25	0	0	0
# of HH with increase from \$26 to \$50	0	0	0
# of HH with increase from \$51 to \$75	0	0	0
# of HH with increase from \$76 to \$100	0	0	0
# of HH with increase from \$101 to \$150	0	0	0
# of HH with increase from \$151 to \$200	0	0	0
# of HH with increase from \$201 to \$250	0	0	0
# of HH with increase from \$251 to \$500	0	0	0
# of HH with increase from \$501 to \$1000	0	0	0
# of HH with increase over \$1000	0	0	0
# of Households with a Decrease	10	4	6
% of Households with a Decrease	0%	0%	1%
Average Decrease	-\$11	-\$13	-\$11
# of HH with decrease from \$1 to \$25	10	4	6
# of HH with decrease from \$26 to \$50	0	0	0
# of HH with decrease from \$51 to \$75	0	0	0
# of HH with decrease from \$76 to \$100	0	0	0
# of HH with decrease from \$101 to \$150	0	0	0
# of HH with decrease from \$151 to \$200	0	0	0
# of HH with decrease from \$201 to \$250	0	0	0
# of HH with decrease from \$251 to \$500	0	0	0
# of HH with decrease from \$501 to \$1000	0	0	0
# of HH with decrease over \$1000	0	0	0

HCV - Rent Simplification Impact Analysis
Asset Income Exclusion where Asset Value exceeds \$50,000

	ALL	Elderly/ Disabled	Non-Elderly/ Non-Disabled
# of Households	8,155	3,768	4,387
Annual Total HAP			
Baseline	\$57,969,660	\$22,418,076	\$35,551,584
Proposed	\$57,970,092	\$22,418,496	\$35,551,596
Change	\$432	\$420	\$12
Average Family Share			
Baseline	\$3,882	\$3,856	\$3,905
Proposed	\$3,882	\$3,856	\$3,905
Change	\$0	\$0	\$0
Change in Family Share			
# of Households with No Impact	8,149	3,763	4,386
% of Households with No Impact	100%	100%	100%
# of Households with an Increase	0	0	0
% of Households with an Increase	0%	0%	0%
Average Increase	-N/A-	-N/A-	-N/A-
# of HH with increase from \$1 to \$25	0	0	0
# of HH with increase from \$26 to \$50	0	0	0
# of HH with increase from \$51 to \$75	0	0	0
# of HH with increase from \$76 to \$100	0	0	0
# of HH with increase from \$101 to \$150	0	0	0
# of HH with increase from \$151 to \$200	0	0	0
# of HH with increase from \$201 to \$250	0	0	0
# of HH with increase from \$251 to \$500	0	0	0
# of HH with increase from \$501 to \$1000	0	0	0
# of HH with increase over \$1000	0	0	0
# of Households with a Decrease	6	5	1
% of Households with a Decrease	0%	0%	0%
Average Decrease	-\$6	-\$7	-\$1
# of HH with decrease from \$1 to \$25	6	5	1
# of HH with decrease from \$26 to \$50	0	0	0
# of HH with decrease from \$51 to \$75	0	0	0
# of HH with decrease from \$76 to \$100	0	0	0
# of HH with decrease from \$101 to \$150	0	0	0
# of HH with decrease from \$151 to \$200	0	0	0
# of HH with decrease from \$201 to \$250	0	0	0
# of HH with decrease from \$251 to \$500	0	0	0
# of HH with decrease from \$501 to \$1000	0	0	0
# of HH with decrease over \$1000	0	0	0

HCV - Rent Simplification Impact Analysis
Exclusion of all Full-time Student Wage Income

	ALL	Elderly/ Disabled	Non-Elderly/ Non- Disabled
# of Households	8,155	3,768	4,387
Annual Total HAP			
Baseline	\$57,969,660	\$22,418,076	\$35,551,584
Proposed	\$57,981,204	\$22,422,384	\$35,558,820
Change	\$11,544	\$4,308	\$7,236
Average Family Share			
Baseline	\$3,882	\$3,856	\$3,905
Proposed	\$3,881	\$3,855	\$3,903
Change	-\$1	-\$1	-\$2
Change in Family Share			
# of Households with No Impact	8,072	3,741	4,331
% of Households with No Impact	99%	99%	99%
# of Households with an Increase	0	0	0
% of Households with an Increase	0%	0%	0%
Average Increase	-N/A-	-N/A-	-N/A-
# of HH with increase from \$1 to \$25	0	0	0
# of HH with increase from \$26 to \$50	0	0	0
# of HH with increase from \$51 to \$75	0	0	0
# of HH with increase from \$76 to \$100	0	0	0
# of HH with increase from \$101 to \$150	0	0	0
# of HH with increase from \$151 to \$200	0	0	0
# of HH with increase from \$201 to \$250	0	0	0
# of HH with increase from \$251 to \$500	0	0	0
# of HH with increase from \$501 to \$1000	0	0	0
# of HH with increase over \$1000	0	0	0
# of Households with a Decrease	83	27	56
% of Households with a Decrease	1%	1%	1%
Average Decrease	-\$12	-\$13	-\$11
# of HH with decrease from \$1 to \$25	83	27	56
# of HH with decrease from \$26 to \$50	0	0	0
# of HH with decrease from \$51 to \$75	0	0	0
# of HH with decrease from \$76 to \$100	0	0	0
# of HH with decrease from \$101 to \$150	0	0	0
# of HH with decrease from \$151 to \$200	0	0	0
# of HH with decrease from \$201 to \$250	0	0	0
# of HH with decrease from \$251 to \$500	0	0	0
# of HH with decrease from \$501 to \$1000	0	0	0
# of HH with decrease over \$1000	0	0	0

HCV - Rent Simplification Impact Analysis
Exclusion of all Adoption Assistance Payments

	ALL	Elderly/ Disabled	Non-Elderly/ Non- Disabled
# of Households	8,155	3,768	4,387
Annual Total HAP			
Baseline	\$57,969,660	\$22,418,076	\$35,551,584
Proposed	\$57,971,700	\$22,418,964	\$35,552,736
Change	\$2,040	\$888	\$1,152
Average Family Share			
Baseline	\$3,882	\$3,856	\$3,905
Proposed	\$3,882	\$3,856	\$3,905
Change	\$0	\$0	\$0
Change in Family Share			
# of Households with No Impact	8,145	3,764	4,381
% of Households with No Impact	100%	100%	100%
# of Households with an Increase	0	0	0
% of Households with an Increase	0%	0%	0%
Average Increase	-N/A-	-N/A-	-N/A-
# of HH with increase from \$1 to \$25	0	0	0
# of HH with increase from \$26 to \$50	0	0	0
# of HH with increase from \$51 to \$75	0	0	0
# of HH with increase from \$76 to \$100	0	0	0
# of HH with increase from \$101 to \$150	0	0	0
# of HH with increase from \$151 to \$200	0	0	0
# of HH with increase from \$201 to \$250	0	0	0
# of HH with increase from \$251 to \$500	0	0	0
# of HH with increase from \$501 to \$1000	0	0	0
# of HH with increase over \$1000	0	0	0
# of Households with a Decrease	10	4	6
% of Households with a Decrease	0%	0%	0%
Average Decrease	-\$17	-\$19	-\$16
# of HH with decrease from \$1 to \$25	10	4	6
# of HH with decrease from \$26 to \$50	0	0	0
# of HH with decrease from \$51 to \$75	0	0	0
# of HH with decrease from \$76 to \$100	0	0	0
# of HH with decrease from \$101 to \$150	0	0	0
# of HH with decrease from \$151 to \$200	0	0	0
# of HH with decrease from \$201 to \$250	0	0	0
# of HH with decrease from \$251 to \$500	0	0	0
# of HH with decrease from \$501 to \$1000	0	0	0
# of HH with decrease over \$1000	0	0	0

Appendix B: Streamlined Flat Rent Impact Analysis

	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Annual Recerts						
# of Flat Rent Households	158	152	150	141	133	126
Total Annual Rent Roll	\$1,184,676	\$1,206,696	\$1,228,296	\$1,249,596	\$1,270,848	\$1,290,492
5 Year Recerts						
# of Flat Rent Households	158	158	158	158	158	126
Total Annual Rent Roll	\$1,184,676	\$1,184,676	\$1,184,676	\$1,184,676	\$1,184,676	\$1,290,492
Total Annual Rent Roll Year 1-5						
Annual Recerts	\$6,245,928					
5 Year Recerts	\$6,029,196					
Difference in Rent Roll	-\$216,732					
Average Tenant Savings over 5 years	\$1,372					

Flat Rent Assumptions

	5 Year Average Annual Change	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
0 BR	3.0%	\$481	\$495	\$510	\$525	\$541	\$557
1 BR	2.3%	\$550	\$563	\$576	\$589	\$603	\$617
2 BR	1.5%	\$682	\$692	\$702	\$713	\$724	\$735
3 BR	1.1%	\$926	\$936	\$946	\$956	\$967	\$978
4 BR	0.9%	\$1,045	\$1,054	\$1,063	\$1,073	\$1,083	\$1,093

Appendix C: 5 Year Capital Plan

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
BEECHER TERRACE - 002									
CHOICE - Beecher Implementation	11,023,334	2,404,027	2,619,307	4,000,000	1,535,047		464,953		
CHOICE - Beecher Relocation	1,221,931	702,074	519,857						
CHOICE - Beecher CHOICE Demolition	-								
Tree Trimming	5,375	5,375							
Dwelling Equip - Ranges and Refrigerators	-	0							
Eviction Prevention Program	30,000	30,000							
HALO Community Policing	47,500	47,500							
Resident Stipends - Security Activities	1,000	1,000							
Security	-								
Site Total	12,329,140	3,189,976	3,139,164	4,000,000	1,535,047	0	464,953	0	0
PARKWAY PLACE - 003									
Exterior Lighting	290,000								290,000
Parking Lot Paving / Speed Bumps	105,000								105,000
Water Main Valve Replacement	50,000		0						50,000
Foundation crack sealing	20,000								20,000
Basement Window Replacement	50,000		0						50,000
Replace Gutters, Soffits, Downspouts, Gables	870,000					870,000			
Roof Repairs	300,000	100,000	200,000						
Roof Replacements	1,000,000				1,000,000				
Roof on Maintenance Shop	100,000		100,000						
HVAC Replacement - Parkway Resource Center	65,000					65,000			
HVAC Rooftop unit - Wiggins center	22,000					22,000			
Replace HVAC System with Central AC & Heat	81,000	1,000	80,000						
Heat Risers	2,200,000				1,000,000		1,200,000		
Sidewalk Repair	50,000							50,000	
Lobby Security Renovations / Bullet Resistant Glass	280,000	280,000							

Peach - over 5 years old
Green - under way or complete

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Gator Carts - 4 new	48,000		48,000						
Replacement File Server	6,000	6,000							
Office - 2 desks and chairs	5,000	5,000							
Pickup Truck	25,000				25,000				
Transit Van 350 Replaces 1252	42,000					42,000			
Maintenance Shop and Office Sprinkler System	127,958	127,958							
Keystone Center Floor	14,045	14,045							
Parkway/California Daycare - replace 3 air handlers and condensers	21,000							21,000	
Smoking Huts	43,000	3,000		40,000					
Chimney Wraps for Spalling Brick Surfaces @ \$500	29,000				29,000				
Tuckpointing for 58 buildings	100,000					100,000			
Upgrade Washer Hookups	600,000						600,000		
Tree Trimming	219,979	10,000	29,997	29,997	29,997	29,997	29,997	29,997	29,997
Dwelling Equipment	438,011	49,917	32,360	53,992	56,233	58,474	60,715	63,160	63,160
HALO	380,000	47,500	47,500	47,500	47,500	47,500	47,500	47,500	47,500
Eviction Prevention Program	125,200	24,400	14,400	14,400	14,400	14,400	14,400	14,400	14,400
Resident Stipends	-								
Site Total	7,707,193	668,820	552,257	185,889	2,202,130	1,249,371	1,952,612	226,057	670,057
SHEPPARD SQUARE - 004									
Comprehensive Modernization HOPE VI	5,000	5,000							
Replace Alley pervious pavers with concrete 500 Lampton Street									200,000
	-								
Site Total	5,000	5,000	0	0	0	0	0	0	200,000
DOSKER MANOR - 012									
Building Lobby B & C	200,000	0		50,000					150,000
Replace Stairwell Doors (A)	25,000	0							25,000

Peach - over 5 years old
Green - under way or complete

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Repair Sidewalks	25,000	0							25,000
Replace Ceiling Tiles Lobbies	20,000	0		20,000					
Automatic Doors in elevator vestibules Bldg A	144,000	144,000							
Replace apartment doors B & C buildings	125,000			125,000					
Replace apartment door locks due to age	10,000					10,000			
Replace A/C units as needed	67,725			67,725					
Roof top exhaust vent replacement	20,000			20,000					
Roof	60,000					60,000			
Kitchen cabinet replacements A building	50,000			50,000					
Trash Compactors	280,800	280,800							
Trash Chute Doors	25,000			25,000					
Replace Domestic Water Supply/Sanitation drain lines	1,500,000		180,000			320,000		1,000,000	
Replace Sump Pump and Cover Building B	15,000					15,000			
Replace DHW system - Bldgs A & C	230,000			100,000				130,000	
Replacement office furniture	7,500			7,500					
PTAC all buildings - Bldgs A, B & C F.A.C.	196,397	96,397	100,000						
Boiler system replacement Bldgs A & C	750,000					750,000			
HVAC Penthouse A B and C	17,800					17,800			
Repair A Bldg parking lot behind Elderserve - sinking	25,000					25,000			
Reseal/Grout complete bathrooms A Bldg - leaking	300,000							300,000	
Replace wood entry doors with metal A Bldg - safety concerns	150,000				150,000				
Replace entry system telephones (ELVOX)	7,500			7,500					
Security upgrades Bldg A (overage from security grant)	13,000	13,000							
Replacement safety glass at receptionist counter - safety	40,000			40,000					
Replace hollow core doors both entrances to main office	6,000			6,000					
Paint leased/occupied units	50,000							50,000	
Replacement maintenance equipment - 1 Billy Goat vac, small mower, etc.	10,000			10,000					

Peach - over 5 years old
Green - under way or complete

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Restripe parking areas	5,500			5,500					
Curb appeal	5,000			5,000					
Paint Interior Lobbies and Hallways	25,000	25,000							
Replacement File Server	6,000	6,000							
Billy Goat - 1 / blower	2,500		2,500						
Mowers and Blowers	5,000					5,000			
Management Office Security Upgrade	108,414		108,414						
Additional IP cameras for security system - troubled areas and laundry	15,000			15,000					
Repair exterior and replace garage doors - svce elevators	5,000							5,000	
Additional key FOB readers in all buildings - safety concerns	20,000			10,000				10,000	
Security car V1234	35,000	35,000							
Replacement vehicle for truck # 1050, 1993 Chevy pickup	35,000			35,000					
Panic Bar hardware to install on all "A" building stairwell doors	26,400			26,400					
Building "A" upper concrete floor repairs	15,000			15,000					
Smoking Hut	10,000			10,000					
Tree Trimming	24,700								12,350
Dwelling Equipment	604,038	65,890	68,580	71,289	74,227	77,188	80,144	83,371	83,371
High Rise Security	3,932,400	200,000	533,200	533,200	533,200	533,200	533,200	533,200	533,200
Eviction Prevention Program	34,597	25,000	1,371	1,371	1,371	1,371	1,371	1,371	1,371
Resident Stipends	155,000	15,000	20,000	20,000	20,000	20,000	20,000	20,000	20,000
Site Total	9,440,271	918,437	1,014,065	1,276,465	778,798	1,834,557	634,715	2,132,942	850,292
ST CATHERINE COURT - 013									
Copier	6,000			6,000					
Concrete Foundation Repairs REAC correction of walls, ext ceilings	20,000					20,000			
Modification and upgrades to Fire Pump per PM Global recommendations	5,000					5,000			
Seal and Stripe Parking Lot	7,500			7,500					

Peach - over 5 years old
Green - under way or complete

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Parking Lot Lighting	10,000			10,000					
Clean Exterior Windows	10,000							10,000	
Replace Trash Compactor	143,600	93,600		50,000					
Replace Wallpaper	40,000							40,000	
Replace handicapped door openers	84,000			84,000					
Furniture for community room and lobby	10,000			10,000					
Replace PTAC as necessary	13,000			13,000					
Burnisher/Stripper	7,500			7,500					
Interior and exterior cameras	29,800			29,800					
Elevators	2,000,000			2,000,000					
Cameras for elevators	7,500			7,500					
Simplex Fire Panels	45,000			45,000					
Smoking Hut	10,000			10,000					
Dwelling Equipment	1,000	1,000							
Maintenance Equipment - Vehicle 4 wheel drive	32,000							32,000	
Tree Trimming	2,000	1,000							1,000
Hi-Rise Security	782,400	60,000	103,200	103,200	103,200	103,200	103,200	103,200	103,200
Eviction Prevention Program	9,802	5,000	686	686	686	686	686	686	686
Resident Stipends	67,200	8,400	8,400	8,400	8,400	8,400	8,400	8,400	8,400
Site Total	3,343,302	169,000	112,286	2,392,586	112,286	137,286	112,286	194,286	113,286
AVENUE PLAZA/550 Apt - 014									
Parking Lot Repavement - 550 Apartments	10,000					10,000			
Stairwell Lighting	20,000							20,000	
Automatic Lobby Doors	40,000							40,000	
Repave Parking Lots - Avenue Plaza	850	850							
Wash Windows	25,000						25,000		
Riser Replacement - closed loop	1,000,000							1,000,000	
Paint and Drywall repair in Corridors - 16 floors	48,000		48,000						

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Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Remodel bathroom showers - Avenue	450,000							450,000	
Furniture - avenue common areas and lobbies	25,000			25,000					
Color Copier - 1	7,000			7,000					
Furniture - Manager's Office	6,000			6,000					
Lobby Security Renovations / Bullet Resistant Glass	140,000	140,000							
Paint Apartments - 550 Apartments	154,400						25,000	129,400	
Replace Counter Tops - Kitchens - 550 Apartments	120,000							120,000	
Upgrade electric for stoves - 550 Apartments	360,000						360,000		
Tubs, Sinks, Bathroom Replacement - 550 Apartments	144,000		144,000						
Replace Domestic Water/Sanitation Drain Lines - 550 Apt	233,430		233,430						
Replace Fire Doors Ave Plaza and 550 Apts	65,000			65,000					
Redo floor, ceiling, door, lights in laundry rm - 550 Apt	7,000							7,000	
Replace ceiling tiles 3rd floor all bldgs. - 550 Apartments	5,000			5,000					
New windows on 2nd floor - laundry, lobby, office, kitchen	50,000	50,000							
Playground Equipment - 550 Apartments	40,000							40,000	
Concrete/curbs/sidewalks - 550 Apartments	15,000			15,000					
Trash Compactor Replacement - Avenue	93,600	93,600							
Replace Domestic Water Supply/Sanitation Drain Lines	1,000,000						1,000,000		
Freight Elevator Upgrade	40,000							40,000	
Rooftop units - Modernization and Operations	28,000							28,000	
Re-tile lobby floor and paint walls	16,000			16,000					
Generator	40,000			40,000					
Simplex Fire Panels	45,000			45,000					
Security Cameras - floors 3-18	45,000			20,000				25,000	
Laundry upgrade	5,000			5,000					
Signage for buildings/grounds - 550 Apts.	8,000			8,000					
Guard enclosure at main entrance of Avenue Plaza	20,000			20,000					
(2) Smoking Huts - Avenue and 550 Apts.	20,000			20,000					
Sump Pumps	15,000					15,000			

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Tree Trimming	14,000	7,000							7,000
Dwelling Equipment	224,413	24,480	25,479	26,478	27,577	28,676	29,775	30,974	30,974
Hi-Rise Security	825,600	103,200	103,200	103,200	103,200	103,200	103,200	103,200	103,200
Eviction Prevention Program	39,201	20,000	2,743	2,743	2,743	2,743	2,743	2,743	2,743
Resident Stipends	72,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000
Site Total	5,506,494	448,130	565,852	438,421	142,520	158,619	1,554,718	2,045,317	152,917
SCATTERED SITE - 017									
Drainage - Erosion Fegenbush - Whipps Nolt E. P. 17 #2	150,000								150,000
Hot Water Heaters - Fegenbush - Whipps 17 #2	25,000								25,000
Sidewalks Replaced - Fegenbush - Whipps 17 #2	50,000								50,000
Repair fire damage 2 units at 2400 Chestnut - #17 #1 F.A.C.	14,000	14,000							
Historic Porch 1131 S. 6th Street - Innovative Concrete	125,000	125,000							
Abatement put back 1131 S. 6th St. - painting and windows 17 #1 F.A.C.	86,051			86,051					
Force Account Truck - 50% assigned to AMP #17	15,000	15,000							
Repave Parking lot east pages lane 17 #1	17,200	17,200							
Gutter Guards (KY 19-22-24) 17 #1	35,000						35,000		
Sidewalk Repair - KY 17 (Lourdes) 17 #1	10,000								10,000
Bathroom Renovation - 416 N. 25th St. (10 units) 17 #1	100,000								100,000
Replace HVAC 416 N 25th St. (10 units) 17 #1	57,700								57,700
Bathroom Renovations W St Catherine (10 units) 17 #1	100,000								100,000
Bathroom Renovations 2906 Rio Rita (8 units) 17 #1	120,000								120,000
Bathroom Renovations 624 Rubel (4 units) 17 #1	40,000								40,000
Bathroom Renovations Fegenbush (7 units)	63,000					63,000			
Bathroom Renovations Whipps Mill (17 units)	160,000					160,000			
Bathroom Renovations East Pages (14 units)	136,000					136,000			
Bathroom Renovations Noltemeyer (46 units)	386,000					386,000			
Wrap windows - 964 S 6th St. 17 #1	20,000								20,000
Replace HVAC - 655 Country Club Rd (10 units) 17 #1	100,000								100,000

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Siding and Windows - former LHS sites 17 #1	500,000								500,000
Window Replacement Various Sites #17 #1	30,000								30,000
Exterior Painting Various Sites #17 #1	30,000								30,000
Driveway, parking lot repaved at Country Club 17 #1	10,000			10,000					
Roof replacement 624 Rubel Avenue 17 #1	25,000			25,000					
2756 Montana abatement put back; new kitchen and bathroom 17#1	40,000			40,000					
Windows 621 E. Catherine, 2127 Bank 960-64 S. 6th, 2404 17 #1	50,000					50,000			
Basement waterproofing 410 & 420 S. Shelby St. 17 #1	20,000				20,000				
2 Pickup Trucks - Scattered Sites Bishop 17 #2	50,000							50,000	
2823 Virginia Ave. - Privacy fence west side of property 17 #1	10,000			10,000					
2504,2513 W. Oak St. - New Roofs 17 #1	35,000			35,000					
1527 W. Catherine St. - Rehab unit 17 #1	25,000			25,000					
A/C panel replacement and repairs (\$750/unit X 84) 17 #2	63,000			63,000					
Replace Furnace/AC units - Fegenbush - Whipps 17 #2	50,000			50,000					
Siding - Fegenbush - Whipps 17 #2	40,000			40,000					
Windows - Fegenbush - Whipps 17 #2	20,000			10,000				10,000	
Erosion Repairs - Fegenbush - Whipps(hill erosion E. P.) 17 #2	30,000			10,000				20,000	
Parking Lot repair/replace - Nolt and E P & Whipps 17 #2	100,000			100,000					
Repair/Replace dumpster pads and paving - Noltemeyer 17 #2	250,000						100,000	150,000	
Hot Water Heaters - Noltemeyer and E Pages 17 #2	25,000							25,000	
Replace front/rear concrete porches - 2 houses Newburg 17 #2	17,500							17,500	
Bathroom Renovation - 2 houses Newburg 17 #2	30,000					30,000			
Office Furniture, software, telephone - Noltemeyer 17 #2	5,000							5,000	
Replace Dryer vents to code - Nolt/EP/Whipps/Fegenbush 17 #2	45,000				45,000				
Window replacement for all Newburg windows 17 #2	20,000			20,000					
Repaving and striping parking lots Noltemeyer only 17 #2	150,000				150,000				
Scattered Sites - Replace siding and gutters 17 #2	198,000			75,000		123,000			
Scattered Sites - Noltemeyer - Replace furnace and A/C units 17 #2	250,000					250,000			
Replace #1207 (2001 F250) with heavy duty pickup KY17	32,000							32,000	

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Replace #1228 (2002 Ram) with F250 pickup KY17	32,000							32,000	
Tree Trimming - project 017	20,000	10,000							10,000
Dwelling Equipment - project 017	116,004	13,031	13,563	14,095	14,680	15,265	15,850	16,489	13,031
Eviction Prevention Program 1-17	6,858	3,429							3,429
Resident Stipends 1-17	31,997	1,000	29,997						1,000
Total Amp # 17	3,942,310	198,660	43,560	613,146	229,680	1,213,265	150,850	357,989	1,360,160
SCATTERED SITE - 034									
Hot Water Heaters - Hope VI Scattered Sites 34 #1	50,000								50,000
Paint Exterior - Hope VI Scattered Sites 34 #1	50,000								50,000
Furnace replacement for 22 units at Del Maria 34 #2	100,000								100,000
Replace HVAC - Six Mile Lane 34 #2	100,000								100,000
Window Replacement - 4502 Landside, 8714 - 8718 Bayberry	25,000					25,000			
Carpet - # 34 710 and 714 Jacob, 836 Shelby, 8300 Cottage Field, 6526 Cottage	20,000					20,000			
Carpet - # 45 1820 Neville units 101 103 105 202 203	10,000					10,000			
Carpet - # 47 1401 32nd, 1528 Hemlock, 3827 Hale, 604 Hill, 2213 Dumesnil,	10,000					10,000			
HVAC replacement for hydronic furnaces 601 W Breck #3, 520 W Breck 1 and 2	38,250					38,250			
New bathrooms for all former HAJC units	300,000				300,000				
Fire Damage - 3620 Manslick F.A.C.	60,000			60,000					
702 E. Burnett - Tear down garage in rear 34 #1	10,000			10,000					
1488 Bland - new vinyl siding 34 #1	28,000				28,000				

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
520 W. Breckenridge - new roof 34 #1	22,000			22,000					
702 E. Burnett - Replace retaining wall 34 #1	20,000			20,000					
St. Martin's elevator 34 #1	75,000				75,000				
328 N. Birchwood - Iron fence around retaining wall 34 #1	15,000			15,000					
743,745 E. Breckenridge; 832-838 Shelby - Replace roofs 34 #1	30,000				30,000				
3931 S. Third St. - new rails on balcony and staircases 34 #1	16,000			16,000					
4737 Southern Parkway - new windows 34 #1	18,000					18,000			
1534-1539 Gallagher - Iron fence across 2 property front gates 34 #1	6,000			6,000					
Shelby and Breckenridge roof replacement 34 #1	30,000			30,000					
537 and 539 Campbell roof replacement 34 #1	20,000			20,000					
906 and 908 S. 6th St. parking area repaved and striped 34 #1	15,000			15,000					
Roofs 1485,1488,1499,1499 1/2 Bland St. 34 #1	70,000			70,000					
Replace lighting in common areas - St Martins 34 #1 LED	40,000							40,000	
Replace awning and handrail @ main entrance - St Martins	5,000	5,000							
Pour concrete in basement and garage - St Martins 34 #1	15,000							15,000	
New concrete steps at 2704 Grand Ave 34 #1	20,000			20,000					
Furnace and A/C Replacements - Hope VI Scatt Sites 34 #1	38,250					38,250			
Basements Waterproofing - Hope VI Scattered Sites 34 #1	20,000			20,000					
Friary Comprehensive Modernization 34 #1	1,387,620	599,091	788,529						
Brick and Mortar Repair 1512 Pawtucket 34 #1	45,000			45,000					
Gutter Guards (KY 34-35-38-45) 34 #1	29,000						29,000		
Replace HVAC - move cond to ground - 3931 3rd St. 34 #1	58,000							58,000	
Replace HVAC - 2704 Grand Ave 34 #1	40,400							40,400	
Patch, seal, stripe parking lot at St Martin #34 #1	9,000							9,000	
Gut and Make old LHS Office into Apartment 34 #1	85,000					85,000			
Pressure Washing Various Sites #34 #1	8,000							8,000	
Norbrook structural repairs to deck 34 #2	60,000			20,000			40,000		
Parking lot - Norbrook 34 #2	7,000			7,000					
Parking lot - Taylorsville 34 #2	7,000			7,000					

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Parking lot - Third St. 34 #2	12,000			12,000					
Parking lot - Six Mile Lane 34 #2	10,000			10,000					
Parking lot - Vaughn Mill Rd. 34 #2	7,000			7,000					
Parking lot - Breckenridge and Landside 34 #2	20,000			20,000					
Parking lot - Broadway 34 #2	8,000				8,000				
Parking lot - Ormsby Lane Townhomes 34 #2	6,000				6,000				
Parking lot - Repave and stripe Del Maria 34 #2	35,000				35,000				
Parking lot - Repave and stripe 3332 Breckinridge Lane	50,000					50,000			
3rd St. - Repair foundation and footer 34 #2	250,000				250,000				
Norbrook - Add/replace fence 34 #2	25,000				25,000				
Breckenridge and Landside windows 34 #2	20,000			20,000					
Breckenridge and Landside common hall flooring 34 #2	10,000					10,000			
Town Park Way - flooring in comon hallways 34 #2	7,000			7,000					
Broadway common interior painting 34 #2	10,000			10,000					
Broadway exterior handrail trim and steps 34 #2	10,000			10,000					
Lafontenay - paint and secure all decks 34 #2	5,000			5,000					
Kitchen and bath renovations - Bayberry 34 #2	250,000								250,000
Kitchen & Bath renovation inc dishwasher - Six Mile Lane 34 #2	104,000								104,000
Replace privacy fence and storage - Six Mile Lane 34 #2	25,000				25,000				
Replace HVAC - move to ground 8018 S Third St (8 units) 34 #2	58,000								58,000
Replace Dryer vents to code - Town Park 34 #2	33,200			33,200					
Windows Replacement - 8018 Third St. 34 #2	12,000								12,000
Window Rep / bathroom & Kitchen cabinets - Del Maria 34 #2	45,000				45,000				
Window Replacement - Vaughn Mill 34 #2	18,000				18,000				
Bathroom renovations - Breckinridge/Landside 34 #2	45,000								45,000
Gutters and soffits - Breckinridge/Landside 34 #2	22,000			22,000					
Build Bridge - Taylorsville Rd. 34 #2	7,500							7,500	
Brighton Hill Ct. - Replace steps at this site 34 #2	15,000			15,000					
Breckenridge - window replacement 34 #2	13,300			13,300					

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Del Maria - Replace doors for front and back of each unit 34 #2	25,250			10,000			15,250		
Del Maria - repair/replace fencing behind building 34 #2	25,000				25,000				
3332 Breckenridge - Replace furnace and A/C units 34 #2	54,000					54,000			
Landside - Replace furnaces and A/C units 34 #2	49,500				49,500				
Van, full size panel, replace V1228, WES Plaza	24,000				24,000				
CH8 - 2914 Annie Avenue - Abatement Howell	260,000		260,000						
St Martins Line Set Replacement	20,800								20,800
Appraisals	1,600	1,600							
Acquisitions and related costs	500,000						500,000		
Vinyl siding KY017 - Noltemeyer, Fegenbush, Norbrook 17 #2	125,000			20,000			105,000		
DDC Heating/Cooling Liberty Green Resource Center	35,000							35,000	
Replace #1222 (2002 F250) with same	32,000							32,000	
Replace #1254 (04 F250) with heavy duty pick up	32,000							32,000	
Force Account Truck - 50% assigned to AMP #34	15,000	15,000							
Tree Trimming - project 034	10,000	10,000							
Dwelling Equipment - project 034	225,513	42,451	23,367	24,283	25,291	26,000	27,307	28,407	28,407
Eviction Prevention Program 1-34	34,003	10,000	3,429	3,429	3,429	3,429	3,429	3,429	3,429
Resident Stipends 1-34	-								
Site Total	5,614,186	683,142	1,075,325	645,212	972,220	387,929	719,986	308,736	821,636
LOURDES HALL/Will E Seay Plaza - 018									
Lourdes Hall									
Paint Apartments	50,000								50,000
Fire Escape Handrail Repairs	15,000								15,000
Replace Roof	20,000								20,000
Lintel Replacement	15,000								15,000
(1) 3500 Express Van	26,000			26,000					
Office furniture	5,000			5,000					

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Lobby Furniture	10,000			10,000					
Emergency Notification / Intercom System - Howell & Howell	46,766	46,766							
Carpet Hallways and Lobby	22,000							22,000	
Replacement File Server	6,000	6,000							
Upgrade security cameras and system	25,000			25,000					
Dumpsters for compactor	12,000			12,000					
Two rooftop units and curbs	36,300			36,300					
4 fireproof lateral file cabinets	10,000			10,000					
Extend Maintenance Shop to South Curb	80,000			10,000		70,000			
Replace 3 sets of double doors	20,000					20,000			
Smoking Hut	10,000				10,000				
Parking Lot Patching, Sealing and Striping	11,000					11,000			
Relocation	500	500							
Tree Trimming	7,000	7,000							
Dwelling Equipment	190,780	21,358	22,230	23,102	24,061	20,000	25,979	27,025	27,025
Hi-Rise Security	963,200	120,400	120,400	120,400	120,400	120,400	120,400	120,400	120,400
Eviction Prevention Program	43,888	5,486	5,486	5,486	5,486	5,486	5,486	5,486	5,486
Resident Stipends	72,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000	9,000
Site Total	1,697,434	216,510	157,116	292,288	168,947	255,886	160,865	183,911	261,911
Will E Seay Plaza									
Repair and Repave Parking Lots, seal, stripe/concrete dumpster pad	47,000	0				22,000			25,000
Carpet	25,000	0							25,000
Replace Carpet	25,000			25,000					
Paint Halls/Common Areas	25,000			25,000					
(1) 3500 Express Van	26,000			26,000					
Replacement File Server	6,000	6,000							
Replace 6th Floor main water line	75,000							75,000	
Boiler Replacement - Alpha Mechanical	297,586		297,586						
Upgrade Elevator System	300,000					300,000			

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2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Roof Repairs	8,000			8,000					
Hallway/stairwell heaters point of entry	8,000			8,000					
Replace Carpet (common halls 2-8)	15,000					15,000			
Tile Floors	90,000							90,000	
Van, full size panel, replace V1226 WES Plaza	24,000			24,000					
Kitchen Cabinets - 54 units	200,000						200,000		
Window replacement	275,000					275,000			
Replace Fan Coil Units - 30 units	200,000		200,000						
Replace Medical Alert System	120,000						120,000		
Upgrade Camera system	6,000					6,000			
Elevator Surveillance Cameras WES Plaza	25,000					25,000			
Smoking Hut	10,000				10,000				
Dwelling Equipment	5,000					5,000			
Site Total	1,812,586	6,000	497,586	116,000	10,000	648,000	320,000	165,000	50,000
Scattered Sites - NSP AMP #56									
513 E. Breck - Retaining Wall	6,000			6,000					
Eviction Prevention Program 1-34	2,000	2,000							
Site Total	8,000	2,000	-	6,000	-	-	-	-	-
Scattered Sites - AMP #61									
Temple Spears - Carpet Replacement	25,000					25,000			
Temple Spears - Fire King file cabinet	11,000			11,000					
Temple Spears - floor stripper	6,500			6,500					
Temple Spears - Maintenance Tools and Equipment	7,500			7,500					
Temple Spears - generator	53,000	3,000		50,000					
Temple Spears - Paint interior hallways	15,000			15,000					
Temple Spears - Replace doors and hardware	7,500				7,500				
Temple Spears - Perimeter fence repair	5,000			5,000					
Temple Spears - New key FOB system Alpha Energy and Bowles	44,850	24,850		20,000					
Temple Spears - Security cameras	20,000			20,000					

Peach - over 5 years old
Green - under way or complete

Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Temple Spears - Repair parking lots	15,000			15,000					
Temple Spears - Covered Smoking Huts (2)	20,000				20,000				
Temple Spears - New double door entrance - auto open	20,000			20,000					
Temple Spears Security	3,000	3,000							
Temple Spears - Roof Replacement	500,000								500,000
Demo Clay/Finzer/Jacob	37,554	37,554							
Holly Park - New windows	75,000				75,000				
Holly Park - Replace all exterior doors front and back	80,000			50,000		30,000			
Holly Park - Replace all decks	190,000			40,000		150,000			
Holly Park - Replace furnaces and A/C units	189,000			29,000		160,000			
Holly Park - Drainage Improvements	150,000			150,000					
Holly Park - Replace mailboxes	25,000			15,000	10,000				
Holly Park - Evaluate and repair 1st floors all apts - change crawl areas	170,000			170,000					
Holly Park - Security System Upgrade	20,000					20,000			
Dwelling Equipment	10,000	5,000							5,000
Tree Trimming	7,400	3,700							3,700
Eviction Prevention Program	5,000	2,500							2,500
Site Total	1,644,904	79,604	-	624,000	112,500	385,000	-	-	511,200
Mixed Finance Capital Contributions	-	-	-	-	-	-	-	-	-
Phase III - Park DuValle- 031	358,134	46,739	48,141	49,585	51,073	52,605	54,183	55,808	
Phase IV - Park DuValle - 032	580,607	75,764	78,040	80,384	82,799	85,286	87,848	90,486	
Site Total	938,741	122,503	126,181	129,969	133,872	137,891	142,031	146,294	0
Annual Capital Purchase/Services Contracts	-	-	-	-	-	-	-	-	-
Environmental Consultant - Remediation Monitoring	900,000	100,000	100,000	100,000	100,000	100,000	150,000	150,000	100,000
Annual Asbestos and Lead Removal Contract	900,000	100,000	100,000	100,000	100,000	100,000	150,000	150,000	100,000
Annual A/E Contract	925,000	125,000	100,000	100,000	100,000	100,000	150,000	150,000	100,000

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Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Annual Microsoft Software				32,000	32,000	32,000	32,000	32,000	32,000
Total Annual Contracts	2,585,000	325,000	300,000	332,000	332,000	332,000	482,000	482,000	332,000
Administrative Costs									
Construction Administration - Direct Salaries				0	0	0			
Construction Administration 10% transfer	6,814,908	827,812	855,738	1,282,388	760,000	760,000	775,280	783,030	790,860
General Fund for Operations	1,005,523	405,523	0	100,000	100,000	100,000	100,000	100,000	100,000
Total Administrative Costs	7,820,431	1,233,135	855,738	1,362,388	860,000	860,000	875,280	883,030	890,860
Total Capital Projects	53,543,220	6,585,279	7,157,211	10,590,007	6,264,128	6,269,913	6,070,985	5,614,238	4,991,459
Contingency	2,929,680	10,200	118,250	209,511	10,000	196	182,504	704,738	1,894,281
Total Soft Costs	11,676,172	1,680,638	1,281,919	1,824,357	1,325,872	1,329,891	1,499,311	1,511,324	1,222,860
TOTALS USES	68,149,072	8,276,117	8,557,380	12,623,875	7,600,000	7,600,000	7,752,800	7,830,300	7,908,600
	0	8,276,117	8,557,380	12,623,875	7,600,000	7,600,000	7,752,800	7,830,300	7,908,600
						0			0
Other Capitalized Expenses - Non - Cap or RHF		2016	2017	2018	2019	2020	2021	2022	2023
Central Stores									
Central Stores Roof Replacement	178,367	178,367							
Central Stores Facility Video Surveillance Camera (Safety)	30,000					30,000			
CS Addition - Records Retention	75,000		75,000						
Central Stores Server	6,000	6,000							
Central Stores Forklift	23,500	23,500							
	-								
Regional Maintenance									
High Speed Internet Connection at Safety office to view cameras remotely	20,000					20,000			
Regional Maintenance Roof Repair	142,000				142,000				

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Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	517	518	519	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Regional Maintenance Paint and Reseal Roof	11,000					11,000			
Resurface Parking Lot (HVAC request)	-								
Auto Grounds	-								
Mower, zero turn, 60", 2 each	28,000				28,000				
Salt Spreader, 2 each	12,000				12,000				
Tractor, w/front end loader and bush hog	-								
Trailers, 2 each	6,200				6,200				
Auto Grounds Two 61" Zero Turn Mowers	28,000					28,000			
Auto Grounds Two Salt spreaders	12,000					12,000			
Auto Grounds Trailer	6,200					6,200			
Auto Grounds Backhoe	-								
Van, full size panel, replace V1245, PG&E	24,000				24,000				
Central Maint. PGE/Vac Prep - (3) 3500 Express Van @ \$26,000 each	78,000		78,000						
Central Maint. HVAC (1) 3500 Express Van	26,000		26,000						
Trucks (2) V1227, V1229 PG&E	60,000	60,000							
Replacement Vehicle for Courier	30,000	30,000							
Van, Transit 350 HD, Replaces 1229 PG&E	42,000					42,000			
Van, Transit 350 HD, Replaces 1244 PG&E	42,000					42,000			
Van, Transit Connect, Replaces 1216 Extermination	25,000					25,000			
Truck, Mid-size 4X4, Replaces 1210 Auto/Grounds	32,000					32,000			
Van, Transit 350 HD, Replaces 1437 Forced Accts	42,000					42,000			
Van, Transit 350 HD, Replaces 1449 Forced Accts	42,000					42,000			
Van, Transit Connect, Replaces 1260 Extermination	25,000					25,000			
Van, small size (Transit Connect) Replace V1216, Extermination	23,000					23,000			
HVAC	-								
Van, full size panel, Replaces 1256 which was transferred to FA crew	28,000					28,000			
Truck, Mid-size 4X4 Replaces 1211	32,000					32,000			
Section 8	-								
New Section 8 Facility	4,100,000		2,000,000		850,000	1,250,000			
Central Office	-								

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Louisville Metro Housing Authority

Site	Total	CFP - 16	CFP - 17	CFP - 18	CFP - 19	CFP - 20	CFP - 21	CFP - 22	CFP - 23
2/19/2019 15:52	Funding	\$17	\$18	\$19	Proposed	Proposed	Proposed	Proposed	Proposed
	2015 thru 2022	BUDGET	BUDGET	BUDGET					
Information Technology	50,000				50,000				
Central Office Copier (IT)	10,000				10,000				
Central Office Phone system Replacement	35,000					35,000			
IT Dept Servers	30,000					30,000			
IT Dept Storage	18,000					18,000			
Pressure Sealer Machine (Finance)	40,000				20,000	20,000			
Server Replacements - Central Office	20,000				20,000				
Upgrade Unix	100,000	100,000							
Replacement computer equipment	50,000	50,000							
Software updates	100,000	100,000							
	-								
Executive	-								
Executive Director's car V1273	35,000	35,000							
	-								
Safety and Investigations	-								
Safety and Investigations Server	6,000	6,000							
	-								
Wiggins Family Investment Center	-								
Wiggins Center copier	6,000		6,000						
FIC Server	6,000	6,000							
	-								
	-								
Total Other Capitalized Expenses	5,735,267	594,867	2,185,000	0	1,162,200	1,793,200	0	0	0
Total Capital, RHF and Other Expenses	73,884,339	8,870,984	10,742,380	12,623,875	8,762,200	9,393,200	7,752,800	7,830,300	7,908,600

Peach - over 5 years old
Green - under way or complete

Appendix D: Board Resolution and Certifications of Compliance

RESOLUTION NO. _____

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville, executed a Moving to Work (MTW) Agreement on August 2, 1999 and an Amended and Restated Agreement on April 15, 2008, which provides LMHA with some authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as a part of the Amended and Restated MTW Agreement, a MTW Annual Plan for Fiscal Year 2020 must be developed and submitted to HUD to formally enable LMHA to fully use the policy and budget flexibility provided to public housing agencies participating in the MTW Program; and

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

WHEREAS, the proposed FY 2020 MTW Annual Plan was made available for public comment between March 4, 2019 and April 2, 2019 and a public hearing was held on March 21, 2019 to discuss the Proposed FY 2020 MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2020 MTW Annual Plan is approved, and that the Executive Director and Contracting Officer, Lisa Osanka, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

I. STATEMENT OF FACTS:

Moving to Work (MTW) is a demonstration program legislated by Congress in 1996 that provides increased autonomy for selected Public Housing Agencies (PHAs) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families. MTW legislation allows participating PHAs to combine federal resources from the Operating Budget, Capital Fund, and the Housing Choice Voucher (HCV) Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

In October 1997, the former Housing Authority of Louisville (HAL) was chosen as one of 24 MTW Demonstration awardees. HAL's MTW Agreement, which specified the regulatory relief afforded to the organization, was finalized and signed on August 2, 1999, and was originally for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire as of June 30, 2005. LMHA was fortunate to receive a one-year extensions, followed by an additional three-year extension.

On December 20, 2007, HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board on April 15, 2008 and will extend participation in the MTW Program until June 30, 2018. This date was later extended to June 30, 2028.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other agencies. In compliance with this requirement, the LMHA Board of Commissioners is set to adopt the FY 2020 MTW Annual Plan on April 16, 2019 and the Plan will be submitted to HUD on April 17, 2018.

LMHA hired Edgemere Consulting Corporation (Edgemere) to assist in the development of MTW Plans and Reports and other related MTW activities. The FY 2020 MTW Annual Plan has been prepared and made available for public comment on March 4, 2019 through April 2, 2019. A public hearing to discuss the proposed Plan was held on March 21, 2019.

The FY 2020 MTW Annual Plan requested HUD approval of change to the following MTW activities:

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

I. STATEMENT OF FACTS (cont'd):

1. Activity #2020-1: Rent Simplification. This is a proposed new activity combining approved, existing activities with new activities. LMHA is re-proposing this activity to include several new rent simplification policies. LMHA has previously received approval and implemented the rent simplification policies outlined below:
 - a. Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – Housing Choice Voucher (HCV) Program (Formerly Activity #40-2014, approved FY 2015 and implemented FY 2016).
 - b. Elimination of the Mandatory Earned Income Disregard (Formerly Activity #32-2012, approved FY 2012; implemented in HCV Program FY 2012; and implemented in Public Housing Program FY 2014).
 - c. Standard Medical Deduction (Formerly Activity #8-2008, approved and implemented FY 2008).
 - d. Earned Income Disregard for Elderly Families (Formerly Activity #6-2008, approved and implemented FY 2008).

Under the re-proposed rent simplification activity, LMHA will use MTW flexibility to implement the changes outlined below. All the changes below, except for the payment standard policy, will be applied to both HCV, including Project Based Voucher (PBV) families, and Public Housing (PH).

- a. Asset Policy. Self-certification of assets, including exclusion of income from assets valued up to \$50,000.
- b. Exclusion of all Full-Time Student Income.
- c. Exclusion of all Adoption Assistance Payments.
- d. Application of Payment Standards. Using its MTW flexibility, LMHA will apply the payment standard in effect on the effective date of the regular recertification, regardless of any fluctuation in the payment standard from year to year.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

I. STATEMENT OF FACTS (cont'd):

2. Activity #2020-2: Streamlined Flat Rent. LMHA will update flat rents every five years from the date of the last change. However, if the average Fair Market Rent (FMR) for all bedroom sizes increases more than 5% in any given year, LMHA will update the flat rent schedule and complete flat rent updates for families on their respective anniversary dates.
3. Activity #2020-3: Local Forms. Under this initiative, LMHA will develop local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies and address local housing market features.
4. Activity #2020-4: Family Self Sufficiency (FSS) Program Enhancements. LMHA proposes using MTW flexibility to enhance the existing FSS Program. Enhancements to LMHA’s FSS program include:
 - a. Modification of the requirement that an FSS applicant must have an interim or annual recertification within 120 days prior to FSS enrollment.
 - b. Opportunity to obtain escrow funds for clients who would otherwise be ineligible for the escrow component of the FSS due to their level of income.
 - c. Placement of an absolute cap (\$16,000) on the amount of escrow regardless of prior FSS participation.
 - d. Establishment of goal-specific incentive payments when a family attains an established goal including, but not limited to:
 - i. \$50 for attendance at three FSS meetings within the first four months of enrollment in FSS;
 - ii. \$100 for attending twelve consecutive months of case management meetings;
 - iii. \$150 for completion of a GED or receipt of a high school diploma;
 - iv. \$250 for an Associates Degrees (one-time limit per person); and,

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

I. STATEMENT OF FACTS (cont'd):

- v. \$500 for completion of a bachelor's or master's degree (one-time limit per person).
 - e. Establishment of an incentive payment for FSS graduates who purchase a home within two years of completion of the FSS program.
 - f. Allow existing FSS participants, at the time of implementation of the local MTW FSS program, the right to opt-in to the local MTW FSS program.
5. Activity #2020-5: Gap Financing. LMHA proposes to utilize MTW flexibility to develop and implement a Gap Financing Program (GFP) for developers using PBVs to create or preserve affordable housing. Gap Financing can grant loans for development and/or preservation. GFP will be offered in the form of a revolving loan fund with a maximum interest rate not to exceed 3%, amortization periods not to exceed 40 years, and loans not to exceed \$1 million per project. LMHA will not loan more than \$5 million per year. All applicants must meet LMHA's underwriting criteria. All applicants must pay prevailing wages and meet M/W/DBE requirements without waiver.
 6. Activity #2005-1: Special Referral MTW HCV Programs. In FY 2020, LMHA plans to add a new voucher allocation to the Special Referral Program. LMHA will partner with Volunteers of America Mid-States to provide up to 50 HCV vouchers for woman recovering from substance abuse disorders and who are pregnant and/or parenting.
 7. Activity #2006-1: MTW Homeownership Program. This is a consolidation of three existing MTW Homeownership Activities (#3-2006, #13-2009, and #11-2009).
 8. Activity #2007-1: Streamlined Recertification Process. LMHA will implement biennial recertifications for all HCV and PH households and eliminate the mini recertification process for HCV. Additionally, households whose only source of income is from Social Security (SS), Supplemental Security Income (SSI) and/or pension will be recertified once every three years as well as PH households on flat rent. Households who report zero income will be recertified annually. LMHA will further streamline the recertification process by accepting documents that are not more than 120 days old when received by LMHA.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

9. Activity #2008-1: Occupancy at Elderly Developments. This is a consolidation of two existing Elderly Development Activities (#10-2008 and #23-2010).
10. Activity #2009-1: Streamlined Development and Acquisition. LMHA plans to extend the scope of this activity to include acquisition of sites and/or units for PBV development and/or preservation as well as public housing mixed income sites. This is also a consolidation of former Activities #18-2009 and #26-2011.
11. Activity #2014-1: Public Housing Sublease Programs. This is a consolidation of two existing Public Hearing Sublease Activities (Frazier Rehab and YouthBuild).
12. Activity #2019-1: Enhancements to Local Project-Based Voucher (PBV) Program.
 - a. PBV proposals may be selected based on any one of the following three methods: previous competition, Request for Proposals, or selection of LMHA-owned properties without a competitive process or prior HUD approval.
 - b. Up to 100% of units within any given project may be awarded PBV assistance.
 - c. When LMHA has received owner notice that the rehabilitated or newly constructed housing is completed, the Housing Authority will inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter a HAP Contract (AHAP), including compliance with HQS standards, except that in lieu of LMHA inspection of the units, the owner may submit the Certificate of Occupancy issued by Louisville Metro Government as evidence of compliance.
 - d. LMHA will not inspect units at new tenant turnover but will conduct complaint inspections if requested.
 - e. For determining the order in which families on the Housing Authority's PBV waiting list are referred by LMHA to the owner of a project-based elderly or elderly/disabled building, an "Elderly Family" will be defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 55 years of age.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2020 MOVING TO WORK ANNUAL PLAN

Item No. 5f

- f. The income eligibility limit for PBV units will be increased from 50% to 80% of Area Median Income (AMI) except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other third-party funding sources.
- g. For PBV units that are also low-income housing tax credit (LIHTC) units, LMHA will utilize the LIHTC program's Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at recertification.

The required Certifications of Compliance are provided as Attachment A to this resolution.

II. ALTERNATIVES:

- a. Approve the submission of the proposed FY 2020 Moving to Work Annual Plan.
- b. Do not approve the submission of the proposed FY 2020 Moving to Work Annual Plan.

III. RECOMMENDATION:

Staff recommends Alternative "A".

IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2020 MTW Annual Plan.

Approval of the FY 2020 MTW Annual Plan by Board Resolution is necessary to permit LMHA to update, maximize, and improve the MTW activities already approved by the Board and HUD.

Submitted by: Heath Rico-Storey
Compliance Manager
April 16, 2019

30 April 16, 2019

Other Business:

There being no further business to come before the Board, Mr. Gilbert motioned to adjourn, seconded by Rev. Ellis. Motion carried by unanimous vote.

The Board adjourned at 5:43 p.m.



Vickie J. Fields, Executive Secretary



Manfred Reid, Sr., Chairman

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning July 1, 2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

<u>Louisville Metro Housing Authority</u>	<u>KY001</u>
MTW PHA NAME	MTW PHA NUMBER/HA CODE
<p><i>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).</i></p>	
<u>Manfred Reid</u>	<u>Chairman of the Board</u>
NAME OF AUTHORIZED OFFICIAL	TITLE
	<u>4/16/19</u>
SIGNATURE	DATE
<p><small>* Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</small></p>	

Appendix E: Documentation of Public Process

Public Hearing and Comment Period Advertisement

PUBLIC MEETING

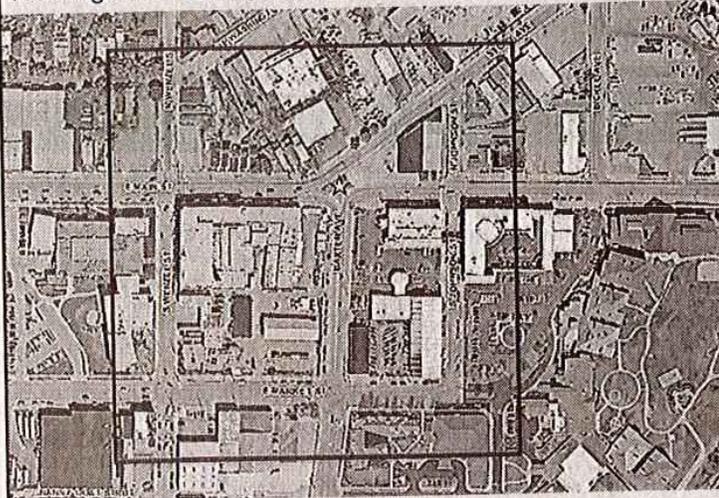
Main St. and Story Ave. Intersection Reconfiguration
March 20, 2019 at 5:00 to 6:30 PM
930 E Main St., Louisville, KY 40206 (Lincoln Elementary)

Item No.: 5-758.00

Intersection: Main St. and Story Ave

County: Jefferson

Louisville Metro Government will be hosting a public open house to present the reconfiguration of the Main St. and Story Ave intersection project. The meeting will be an opportunity to comment on the preliminary planning and design for the reconfiguration of the Main St. and Story Ave.



Once compiled, the meeting record will be made available for review and copying only after an Open Records Request has been received and approved. All Open Records Requests must be submitted to the KY Transportation Cabinet, Offices of Legal Services, Transportation Cabinet Office Building, 200 Mero Street, Frankfort, KY 40622.

In accordance with the American with Disabilities Act (ADA), if anyone has a disability and will require assistance, please notify Michael King of the necessary requirements no later than March 18, 2019. This request does not have to be in writing.

Please address any questions regarding this meeting or project to:

Michael King
Louisville Metro Advanced Planning
444 S. 5th Street
Louisville, KY 40202

INVITATION TO BID

Family Health Centers Inc. a Louisville based 501C3; Federally Qualified Community Health Center is accepting bids from 03/01/2019 through 03/15/2019 for an Electronic Health Records and Practice Management System with Integrated Electronic Dental Health Records. The bid closing will be at 2:00PM on Friday 03/15/2019. For more information or to receive a bid packet please visit the FHC web site at <http://www.fhclouisville.org/Procurement/> or contact us at 502-772-8115 or via email at lowen@fhclouisville.org. Full details regarding bids can be obtained in the Accounting Department at 2215 Portland Ave.

PUBLIC NOTICES

Louisville Metro Housing Authority (LMHA) - Public Hearing & Public Comment Period for: 1) Submission of FY2020 Moving to Work (MTW) Annual Plan; 2) Changes to PH Admissions & Continued Occupancy Policy; & 3) Changes to Housing Choice Voucher Program Administrative Plan. There will be a public hearing to discuss the topics listed above on March 21, 2019 at 6:00 PM at Avenue Plaza (400 S. 8th St.) in the Community Room on the 2nd floor. Draft documents will be available for review and public comment from March 4, 2019 through April 2, 2019 on LMHA's website (www.lmha1.org); at LMHA's main office (420 S. 8th St.); Section 8 office (801 Vine St.); at PH Management Offices; or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-4471. TDD: (502)587-0831.

PRIVATE/DOMESTIC CARE WANTED

Resident Flyer Public Hearing Sign-In Sheet Page 1

MOVING TO WORK (MTW)
PUBLIC HEARING
MARCH 21, 2019
6:00 p.m.

	NAME	ADDRESS OR COMPANY	PHONE NUMBER	EMAIL
1	Noble Jackson	Noble Homes of KY Louisville KY 40259	502-643-9238	noblehomesofky@gmail.com
2	Lisa O'Connell	LMHA	502-527-3420	
3	Dan Farrell	LMHA	502-569-6902	
4	Heather Rao Sweeney	LMHA	502-569-4471	
5	Tonya Wise	LMHA	502-491-5277	Wise@lmha1.org
6	Uroslava Sistrunk	LMHA	377-5284	
7	Haley Holmes Bell	LMHA	502-4901	
8	Dave Miller	LMHA		
9	E. Davis	304 Avenue PLAZA		
10	J. Carr	LMHA		
11				
12				
13				
14				
15				

Sign-In Sheet

1. Submission of FY2020 Moving to Work (MTW) Annual Plan
2. Changes to Public Housing Admissions Continued Occupancy Policy
3. Changes to Housing Choice Voucher Program Administrative Plan

**Louisville Metro Housing Authority
Fiscal Year 2020 MTW Plan**

Comments & Responses

The table below includes a summary of comments received during the public comment period and/or at the FY 2020 MTW Plan Public Hearing held on March 21, 2019 at Avenue Plaza in Louisville. LMHA’s responses are also included.

No.	Topic	Comment	LMHA Response
Public Hearing Comment			
1.	Not Applicable	<ul style="list-style-type: none"> No comments on the Plan were made at the hearing 	<ul style="list-style-type: none"> No response required
Metropolitan Housing Coalition (MHC)			
2.	Gap Financing Proposed Activity	<ul style="list-style-type: none"> MHC states taking \$5M from the Section 8 Housing Choice Voucher (HCV) violates fair housing. 	<ul style="list-style-type: none"> LMHA feels that its programs and priorities are consistent with the statutory objectives for the MTW program. Additionally, the GFP will not reduce LMHA’s Housing Choice Voucher budget, of which the PBV program budget is a part of and LMHA is in compliance with income targeting requirements.
3.	Increase in income eligibility limit for PBV units	<ul style="list-style-type: none"> MHC comments that the proposal to increase the income eligibility limit for PBV units from 50% to 80% does not expand the access of extremely low income households and has a disparate impact. 	<ul style="list-style-type: none"> The increase in the income eligibility limit for PBV units from 50% to 80% of Area Median Income (AMI) is not a new LMHA policy proposal. Previously, in an amendment to the MTW FY 2018 Plan, LMHA proposed, and HUD approved the provision. Therefore, LMHA is incorporating a previously approved policy into the FY 2020 MTW Plan. Additionally, increasing the income eligibility limit ensures that LMHA can serve a mix of income eligible households all in need of affordable housing options.
4.	Owner managed site based waiting lists for PBVs	<ul style="list-style-type: none"> The Local Project Based Voucher Program, as proposed, is designed to limit the probability of participation by black households. 	<ul style="list-style-type: none"> Again, the use of owner manager site based waiting lists for PBVs is not a new LMHA policy proposal. Previously, in an amendment to the MTW FY 2019 Plan, LMHA proposed, and HUD approved the provision. Therefore, LMHA is incorporating a previously approved policy into the FY 2020 MTW Plan. Additionally, the policy is intended to: <ul style="list-style-type: none"> Attract and incentivize developers to participate in LMHA’s PBV program, and as result create and preserve more

No.	Topic	Comment	LMHA Response
			<p>affordable housing for low income households; and,</p> <ul style="list-style-type: none"> ○ Streamline the administration of PBV waiting lists for LMHA, and generate cost and time savings for the agency. Any savings experienced by LMHA as a result of this initiative will allow the agency to address other important affordable housing issues.
Thomas Lambert			
5.	Support of MHC's comments	<ul style="list-style-type: none"> • Mr. Lambert agrees with MHC's critique of the plan. 	<ul style="list-style-type: none"> • See response to MHC
Patricia Ramey			
6.	HCV Budget	<ul style="list-style-type: none"> • Comments that LMHA should restore the Section 8 HCV budget. 	<ul style="list-style-type: none"> • See response to MHC
7.	Waiting List	<ul style="list-style-type: none"> • Comments that LMHA should have a central waiting list for all properties. 	<ul style="list-style-type: none"> • See response to MHC
8.	PBV Income Limit	<ul style="list-style-type: none"> • Comments that LMHA should not raise the income limit to 80% of AML. 	<ul style="list-style-type: none"> • See response to MHC
Coalition for the Homeless			
9.	General	<ul style="list-style-type: none"> • The Coalition for the Homeless thanks LMHA for the leadership in ending veteran, chronic and now youth homelessness. 	<ul style="list-style-type: none"> • LMHA appreciates the Coalition's feedback and comments on the MTW Plan.
10.	Tracking of homeless persons	<ul style="list-style-type: none"> • The Coalitions asks that LMHA track the number of homeless person housed in LMHA programs in order to achieve the full points awarded by HUD through COC Program. 	<ul style="list-style-type: none"> • Tracking the number of homeless households served by the Agency does not require a change to the MTW Plan. LMHA will explore opportunities to track the requested information.
11.	Expedite the lease up process	<ul style="list-style-type: none"> • The Coalitions encourages LMHA to expedite the lease up process by combining two meeting now required at LMHA in to a single meeting. 	<ul style="list-style-type: none"> • Revising the lease up process is a procedural change that would not require a change to the MTW Plan. LMHA is committed to streamlining processes for applicant and participants and will explore opportunities to expedite the lease up process.
Volunteers of America			
12.	Special Referral MTW Housing Choice Voucher Programs	<ul style="list-style-type: none"> • Volunteers of America supports the allocation of 60 Housing Choice Vouchers for families that Volunteers of America's Freedom House addiction recovery program. 	<ul style="list-style-type: none"> • LMHA thanks Volunteers of America for its support of LMHA programming.

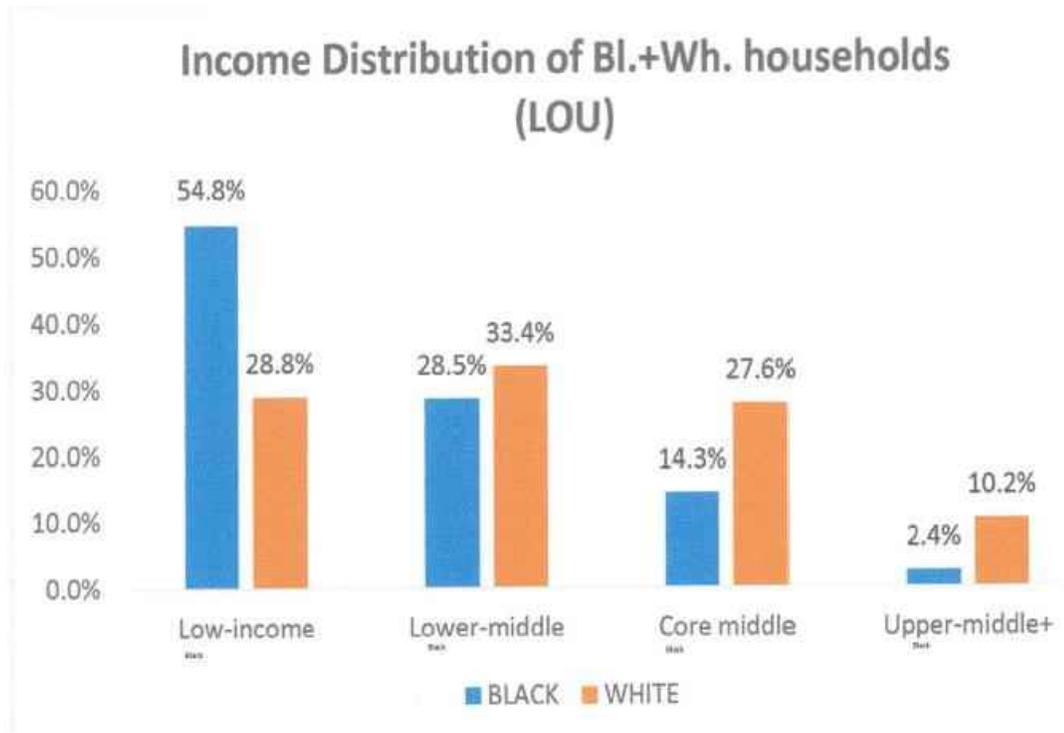
Comment Letters and Responses to Substantive Comments

MHC Comment Letter



Metropolitan Housing Coalition
P.O. Box 4533
Louisville, Kentucky 40204
Phone: (502) 584-6858
Fax: (502) 452-6718

Louisville Metro Housing Authority
FY2020 Moving to Work Annual Plan
Comments by Cathy Hinko
March 19, 2019



Low-income: Households making below \$35,000 a year
Lower-middle: Households making between \$35,000 – \$74,999 a year
Core middle: Households making between \$75,000 - \$149,999 a year
Upper-middle+: Households making \$150,000 a year or more

Median Household Income – LOU MSA

Blacks: \$33,103
Whites: \$59,222

This chart exposes the racism built into the new policies of the Louisville Metro Housing Authority (LMHA) in the Moving to Work Plan for Fiscal Year 2010. These policies should not be implemented.

- A. Taking \$5 million from Section 8 Housing Choice Vouchers (HCV) violates fair housing as it has a negative disparate impact on black households. By law, 24 C.F.R section 982.201 (b) (2) requires that ...”not less than 75 percent of the families admitted to a PHA’s HCV program during the PHA fiscal year from the PHA waiting list shall be extremely low income families...” Extremely low-income is defined as 30% of median which for Louisville as of 2018 was \$17,200 for a two-person household, \$20,780 for a three-person household and \$25,100 for a four-person household. No other program has this mandate.

LMHA proposes taking \$5million from Section 8 despite the fact that 30% of Louisville’s black population lives in poverty compared to 11% of the white population and despite the massive difference in median income for black households compared to white households.

The LMHA estimated the average cost of the HCV for those in the simplified income verification program as \$592 per month, which is about \$7,100 per year. \$5 million would serve over 650 families for a year. This shows an indifference to all lowest income households and is directly responsible for homelessness for families with children.

The Coalition for the Homeless estimates it costs \$19,000 each year for a homeless adult. Statistically, children experiencing homelessness do not have the achievement levels of housing stable children, so the current cost and future consequences of earning capacity is staggering. The cost to Louisville of the diversion of funds from Section 8 Housing Choice Vouchers far exceeds any benefits.

- B. LMHA does not do this to expand the access of extremely low income households in other programs. All other program have much higher income limits.

In fact, LMHA proposes to RAISE the income level for the replacement public housing that will be in the Local Project Based Voucher program from 50% (about \$35,050) of median to 80% to (\$56,800) of median income.

The chart shows the disparate impact of deliberately changing the policy in contravention of the current laws. The deliberation shows the decision to limit the probability of black households using this program.

Increasing the indifference to the racism is that LMHA is going to actually subsidized the creation of units that will exclude black applicants through the Gap Financing Program. This is reminiscent of the programs that the federal government used to promote white homeownership to the exclusion of black households. No doubt some of the funds siphoned off of the Section 8 HCV program will be twisted into this repudiation of increased housing choice.

- C. The Local Project Based Voucher Program, as proposed, is designed to limit the probability of participation by black households in other ways. This program has replacement public housing units in designated complexes owned by private landlords. There is only one function of initial renting that LMHA is not doing: LMHA will not keep a central waiting list. LMHA will have Balkanized waiting lists forcing applicants to go to multiple locations to apply for a few units, despite the cost in money and time to the application. LMHA will not require standardized criteria for criminal background or financial background and does not have any bar from the private landlord charging a fee.

But in all other functions LMHA will take responsibility- to qualify the renter's income, inspect the unit, exercise contractual remedies for violations of the HAP contract and determination of rent to owner. The ONLY function LMHA will not do is the one that will make application easier, safer and consistent for people who have limited incomes.

This disregard for applicants is nothing new. This exacerbates an already Balkanized system, but this change substantially increases the worst practice of LMHA. While the shelters went to a single point of entry very successfully, LMHA seems incapable of learning from others. Or maybe the board of LMHA is simply indifferent to the people they nominally serve. LMHA has used its powers under the Moving To Work program to the detriment of this community.

LMHA should restore the Section 8 Housing Choice Voucher budget.

LMHA should have a central waiting list for all properties for which LMHA has a contract. All these properties should be subject to a unified criminal background policy, a uniform financial/rental history policy and application fees should be barred.

LMHA should NOT raise the limit on income to 80% of median, but keep the limit at 50%.

LMHA Response to MHC Comment Letter



April 15, 2019

Cathy Hinko
Executive Director
Metropolitan Housing Coalition
P.O. Box 4533
Louisville, KY 40204

Ms. Hinko:

We received comments submitted by the Metropolitan Housing Coalition (MHC) for the FY2020 Moving to Work (MTW) Annual Plan, Housing Choice Voucher Administrative Plan, and Public Housing Admissions and Continuing Occupancy Policy. We appreciate that MHC took the time to review our proposals. At the outset, it is important to point out that all the initiatives that MHC commented on relate to efforts to provide a choice of replacement housing options to households relocating from Beecher Terrace and should be read with that context in mind. Responses to MHC comments follow in the order presented.

- A. **Gap Financing Program.** MHC's first comment relates to LMHA's proposed Gap Financing Program (GFP). The GFP will allow LMHA to utilize up to \$5 million, funded from U.S. Department of Housing and Urban Development (HUD)-held Section 8 reserves, for loans to developers for creating or preserving affordable housing through LMHA's project-based voucher (PBV) program. LMHA remains compliant with HUD requirements in the administration of its PBV program.

First, the GFP will not reduce LMHA's Housing Choice Voucher budget, of which the PBV program budget is a part. The source of funds for the GFP will be HUD-held Section 8 reserves. Therefore, LMHA's Housing Choice Voucher funds will not be diverted to fund the GFP, rather LMHA is putting funds normally held in reserve to expand affordable housing choices. In addition, developers who borrow funds via the GFP will be required to pay back such loans to LMHA in full, which means that the funds will be returned to the LMHA for future affordable housing uses.

With regard to compliance with the HUD regulatory requirement under 24 CFR 982.201 (b)(2), LMHA tracks data on extremely low-income families and often exceeds the HUD requirements. For instance, in this fiscal year to date,



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the percentage of families in the extremely low-income range is over 82%.

Second, the GFP is an essential component of the Beecher Terrace one-for-one replacement housing plan. As discussed in more detail below, several former Beecher residents have incomes in the 50% to 80% median range and have the right to return to housing developed as a part of the CNI Program. In this era of aging housing stock and diminishing resources, LMHA must look to innovative approaches such as its PBV program to replace its housing stock and rehouse families who have a right to return but have higher levels of eligible incomes. Other housing authorities have successfully used this strategy to serve participating families whose incomes have changed, but still require assistance. LMHA believes the new GFP will result in high quality replacement housing options for Beecher Terrace units and is an important tool for LMHA to satisfy its obligations to former Beecher Terrace families. Moreover, LMHA believes this program will increase housing choices for these families in high-opportunity areas.

In furtherance of the GFP, LMHA issued a rolling Request for Proposals (RFP) in May 2018. After receiving no responses to this initial RFP, LMHA revised the RFP to provide additional flexibilities to potential developers addressing their top concerns about participating in the program. While there were many concerns addressed by developers, one of the primary concerns was the Federal governmental requirement that Davis Bacon wage rates be paid to contractors and subcontractors for projects receiving PBVs within 18 months of construction completion. Depending on the size of the project, this can significantly raise construction costs, a major deterrent to developers in creating new or rehabilitated replacement housing options for Beecher Terrace residents. Use of the flexibilities provided by the GFP loan funds can help offset these cost differentials, helping to ensure that LMHA meets its commitment of creating 442 off-site Beecher Terrace replacement units by September 2023.

Any PBV development which contains Beecher Terrace replacement units will be required to provide a preference to relocated Beecher Terrace residents for a period of 5 years from the date of HAP contract execution. LMHA's planned marketing and outreach efforts will help ensure that all Beecher Terrace residents will have a priority for PBV units which come online and receive gap financing. Beecher Terrace residents will also receive ongoing reminders of these PBV opportunities as well as assistance with moving



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should they decide to move within the designated timeframe.

- B. Income Limits.** MHC's second comment relates to LMHA's increase of income limits under its PBV program. LMHA proposes to raise the income limits from 50% of area median income (AMI) to 80% of AMI to protect Beecher Terrace residents from becoming ineligible for replacement PBV housing.

Early in the Choice Neighborhoods Initiative (CNI) grant implementation process, LMHA conducted an analysis of the income levels of Beecher Terrace residents. The results showed that a small percentage had incomes between 50% to 80% of AMI. However, the number of households in this income range has slightly increased since the CNI grant began and is expected to continue to grow throughout the grant period. The reason for this increase is three-fold: 1) the CNI grant supports working age, able-bodied adults to experience increases in their wages and income, 2) the CNI grant supports increases in the average income of residents, and 3) the CNI grant supports the financial literacy skills of residents and increases residents' savings.

For these reasons, LMHA requested and received approval from HUD through MTW Activity 48-2018 to raise the income limits from 50% to 80% of AMI under the PBV Program in the FY 2018 Moving to Work Annual Plan. This measure helps ensure that Beecher Terrace residents will not inadvertently become ineligible for Beecher Terrace replacement housing units as a result of higher incomes. Without this measure in place, LMHA would be precluded from providing replacement housing to Beecher Terrace residents with incomes greater than 50% AMI. LMHA must provide replacement housing for all former Beecher tenants and believes the increase in income levels supports this goal. In the event that a Beecher Terrace resident's income exceeds 80% AMI, measures will be implemented to provide housing to such residents in the market rate units that will also be created as part of the Beecher Terrace housing plan.

- C. The Local PBV Program.** MHC's third comment is related to the administration of the Local PBV program – specifically that LMHA will not keep a centralized waiting list. As described in the MTW Annual Plan, LMHA intends to use the Local PBV Program as a vehicle to develop Beecher Terrace replacement housing. Relocated Beecher Terrace residents will



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receive first priority for these replacement units within the prescribed time frame.

As with the GFP, LMHA must utilize innovative ways to attract developers to create and preserve affordable housing. Several developers interested in participating in LMHA's PBV program have expressed interest in managing their own waiting lists. However, this option will be offered to developers who demonstrate the experience and capacity to manage their own waiting lists and specifically request to do so. LMHA will manage the waiting lists for other developers who do not meet these criteria, or who require assistance with this administrative function.

Developers will be required to comply with fair housing requirements as well as other federal requirements including, but not limited to: providing public notification of waiting list openings and closings; providing community-wide notice of housing availability; providing reasonable accommodations; and conducting the application process in compliance with LMHA's Language Access Plan. Subject to LMHA's approval, tenant selection preferences may be adopted for individual projects in accordance with LMHA's Administrative Plan, however, relocated Beecher Terrace residents will continue to receive an admission preference for the prescribed time period for all units designated as replacement units. Developers will forward applicants nearing the top of the waiting list to LMHA, and LMHA will continue to maintain responsibility for eligibility determinations. With this approach, LMHA seeks to expand the range and number of units under the PBV program.

MHC also expressed concern that site-based waiting lists will result in residents having to go to multiple locations to apply, costing them time and money in the application process, and the possibility of rejection due to inconsistent background check criteria. LMHA previously addressed these and other concerns regarding site-based waiting lists in January 2019 when it outlined the extensive package of relocation benefits that Beecher Terrace residents will receive. Relocation benefits include transportation assistance to and from sites, special tours of the sites, reimbursement for application fees and credit checks, assistance with security and utility deposits, and compensation for moving expenses either through upfront payments or reimbursements. Beecher Terrace residents will be offered this same assistance should they choose to make a second move to an on-or off-site Beecher Terrace replacement unit. As a reasonable accommodation for



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applicants with disabilities, LMHA may accept applications for owner managed site based waiting lists centrally and forward such applications to owners.

Since PBV replacement units are funded through the HUD Housing Choice Voucher/Section 8 program, they are subject, like every Housing Choice Voucher/Section 8 program, to HUD, Kentucky, and local regulations prohibiting discrimination based upon protected class status. Furthermore, the only occupancy criteria that developer/owners/managers of PBV units may use for screening Beecher Terrace residents is lease compliance at the time of relocation and continued lease compliance during their relocation period.

Residents who apply for units with larger developers and management companies may also benefit from being considered for other units in that company's portfolio beyond the Beecher Terrace replacement units, thus expanding their housing options even further.

- D. **Disparate Impact.** Regarding MHC's concerns about the potential disparate impact of LMHA's FY2020 MTW Annual Plan proposals on protected classes, and low-income black families in particular, we provide these clarifications. First, LMHA is committed to ensuring its policies and practices are fully compliant with fair housing requirements, including safeguarding against potential disparate impacts on protected classes. Moreover, as mentioned previously, the programs MHC questions have been designed to meet the replacement housing needs of former Beecher Terrace residents, most of whom are members of a protected class.

Public housing authorities who utilize MTW flexibility in developing PBV alternate site and selection standards must comply with the Fair Housing Act and Title VI of the Civil Rights Act of 1964 and implementing regulations, as well as other requirements detailed in the Standard MTW Agreement. HUD evaluates the activity and approves it before the alternate standards may be implemented. Accordingly, if HUD indicates that the proposed activity has fair housing related issues or disparate impacts, they will reach out to LMHA for further review and modification of the activity as needed. Please note that LMHA implementation of owner managed PBV site-based waiting lists was previously approved by HUD. Additionally, as part of the Housing



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Opportunities Through Modernization Act (HOTMA), HUD is proposing adoption of owner managed site based waiting lists for the PBV program.

Just to reiterate and as explained in detail above, there will be no reduction of Section 8 HCV as a result of the GFP proposal to leverage PBV and induce developers to produce or preserve more units of affordable housing. Second, the proposed increase in income limits from 50% to 80% of AMI is supported by data that indicate that the change is needed to meet the LMHA's obligations to former Beecher Terrace tenants with incomes over 50% of AMI, and furthermore, LMHA is taking affirmative steps to mitigate any impact. Per the proposal, LMHA has set a baseline and benchmark of zero (0) households at or below 80% of AMI that would lose assistance or need to move due to the income changes and will monitor these benchmarks and respond accordingly should the tenants experience an impact. Finally, with respect to the waiting list concerns, LMHA has implemented an extensive package of relocation benefits and services to mitigate the potential negative effects of site-based waiting lists.

Therefore, there is no robust cause or vigorous linkage between LMHA's proposed policies to the asserted negative impacts. Additionally, as discussed, low-income families and members of protected classes will realize many more benefits from the proposed policies, including more access to affordable units and increased housing choice, than the risks alleged.

We appreciate MHC's comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Osanka", is written over a light blue horizontal line.

Lisa Osanka
Executive Director



420 South Eighth Street, Louisville, KY 40203 | 502.569.3400 | fax 502.569.3459



Coalition for the Homeless Comment Letter



Coalition for the Homeless
louhomeless.org

1300 S 4th St. Suite 250
Louisville, KY 40208

502.636.9550
502.636.9950 fax

March 15, 2019

Ms. Lisa Osanka
Louisville Metro Housing Authority
420 S. Eighth St.
Louisville, KY 40203

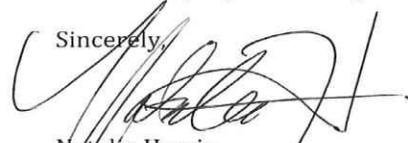
Dear Ms. Osanka,

The Metro Louisville Continuum of Care board and The Coalition for the Homeless would like to once again thank Louisville Metro Housing Authority for the leadership you have provided in Louisville's efforts to end veteran, chronic and now youth homelessness through preferences, partnerships and set asides in LMHA resources. With your leadership and commitment to partnering on housing for the homeless, Louisville is housing homeless veterans at the rate they become homeless and has cut young adult homelessness by 65%.

After reviewing the proposed LMHA Public Housing and Moving to Work plans, we have two comments for change. It is clear that LMHA has fully committed to addressing the need of homeless citizens through set asides and a move on program dedicated to the homeless. We ask that you help us document this commitment by tracking the number of homeless persons housed in LMHA programs in order to achieve the full points awarded by HUD through the CoC Program for housing authorities that house at least 20% of new admissions who were homeless. Additionally, we strongly encourage LMHA to create an expedited rent up process by combining the two meetings now required at LMHA in to a single meeting. This would especially help with those who have disabilities and limited transportation.

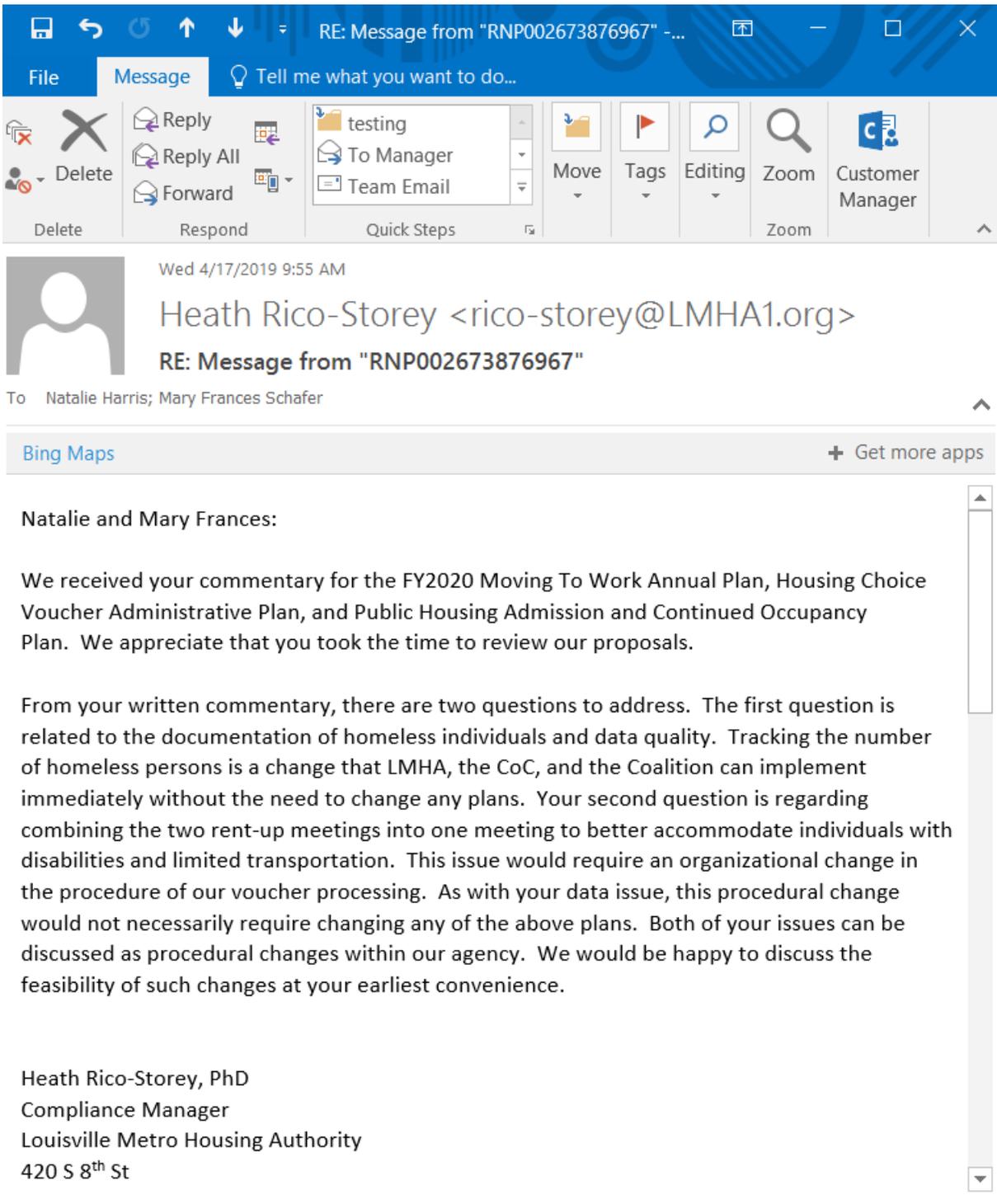
Thank you again for your leadership, your willingness to target those in greatest need and this opportunity to make comment on the proposed changes.

Sincerely,



Natalie Harris
Executive Director

LMHA Response to Coalition for the Homeless Comment Letter



The screenshot shows an email client window with a blue header bar. The title bar reads "RE: Message from 'RNP002673876967' -...". The ribbon includes "File" and "Message" tabs. The "Message" ribbon has sections for "Delete" (with a trash icon), "Respond" (with Reply, Reply All, and Forward icons), "Quick Steps" (with a folder icon and a list containing "testing", "To Manager", and "Team Email"), "Move" (with a folder icon), "Tags" (with a flag icon), "Editing" (with a magnifying glass icon), "Zoom" (with a magnifying glass icon), and "Customer Manager" (with a person icon).

The email content is as follows:

Wed 4/17/2019 9:55 AM

Heath Rico-Storey <rico-storey@LMHA1.org>
RE: Message from "RNP002673876967"

To: Natalie Harris; Mary Frances Schafer

[Bing Maps](#) + Get more apps

Natalie and Mary Frances:

We received your commentary for the FY2020 Moving To Work Annual Plan, Housing Choice Voucher Administrative Plan, and Public Housing Admission and Continued Occupancy Plan. We appreciate that you took the time to review our proposals.

From your written commentary, there are two questions to address. The first question is related to the documentation of homeless individuals and data quality. Tracking the number of homeless persons is a change that LMHA, the CoC, and the Coalition can implement immediately without the need to change any plans. Your second question is regarding combining the two rent-up meetings into one meeting to better accommodate individuals with disabilities and limited transportation. This issue would require an organizational change in the procedure of our voucher processing. As with your data issue, this procedural change would not necessarily require changing any of the above plans. Both of your issues can be discussed as procedural changes within our agency. We would be happy to discuss the feasibility of such changes at your earliest convenience.

Heath Rico-Storey, PhD
Compliance Manager
Louisville Metro Housing Authority
420 S 8th St

Volunteers of America Comment Letter



www.voamid.org
570 South 4th Street, Suite 100, Louisville, KY 40202-2504
Tel: 502.636.0771 | Fax: 502.637.8111

April 2, 2019

Heath Rico-Storey
Louisville Metro Housing Authority

Dear Mr. Rico-Storey,

Volunteers of America Mid-States, providing human services to the Louisville community for nearly 125 years, is pleased to express our support for Louisville Metro Housing Authority's FY2020 Moving to Work (MTW) Annual Plan. Provisions in this plan, including the allocation of 60 Housing Choice Vouchers for families that have graduated our Freedom House addiction recovery program for pregnant and parenting women, will further help some of the most marginalized in our community gain self-sufficiency and continue their journey in long-term recovery from addiction.

This plan, if enacted, will help people like Emilee. Prior to getting involved in drugs, Emilee Ward graduated from DuPont Manuel High School as an honor student and went on to college at the University of Louisville where she studied psychology and was on a pre-med track. She also received scholarships that covered tuition and boarding. Emilee had a bright future ahead of her.

While Emilee was a gifted student, she turned to partying; ultimately she found that drugs and alcohol had taken over and she dropped out of college. Then, substance use became her primary focus. Emilee attempted to get treatment for her substance use. During one such attempt, Emilee found out she was pregnant, but the program did not treat pregnant women. Emilee, still determined to stay sober during her pregnancy, left the program and was able to stay sober on her own until she was about six months pregnant, but began using again. She knew then that she needed the help of a different kind of treatment program, so she began her search. In February 2017, she was admitted into Freedom House, just a week after giving birth to her son, Noah. Unfortunately, Noah was born exposed and with Neonatal Abstinence Syndrome and spent time in the NICU. After Noah left the hospital, Emilee's parents took temporary custody of him so that Emilee could dedicate herself to her treatment, which she did wholeheartedly. Her goal was now to stay sober for herself and her son, and to ultimately create a home for them that would be stable, healthy and loving.

Emilee graduated from Freedom House in August of 2017 and moved into VOA's Transitional Living for Women program, where she resided for about a year while working and taking care of Noah on her own. She was able to secure a house before giving birth to a second son, Ezra late in 2018. Ezra was born healthy and without any exposure to illicit substances. Emilee credits Ezra being born healthy to the tools and skills she learned while at Freedom House that she implements in her daily life.

We know that LMHA's MTW plan, and the ability to offer fully portable Housing Choice Vouchers to families like Emilee's, will allow more women annually to achieve success and long-term sobriety because of expedient access to affordable housing, a common barrier faced by many who are committed to long-term recovery. If I may answer any questions, please do not hesitate to contact me at jenniferh@voamid.org or 502-636-0771.

Sincerely,



Jennifer Hancock, President and CEO



Serving Kentucky, Tennessee, West Virginia, and Clark and Floyd Counties in Indiana.



Appendix F: Disclosure of Lobbying Activities (SF-LLL)

Not Applicable		DISCLOSURE OF LOBBYING ACTIVITIES		Approved by OMB 0348-0046
Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)				
1. Type of Federal Action: a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. Status of Federal Action: a. bid/offer/application b. initial award c. post-award	3. Report Type: a. initial filing b. material change For Material Change Only: year _____ quarter _____ date of last report _____		
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: ^{4c}		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency:		7. Federal Program Name/Description: CFDA Number, if applicable: _____		
8. Federal Action Number, if known:		9. Award Amount, if known: \$		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):		b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		Signature: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: . . .		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Appendix G: Certification of Payments (HUD-50071) Form

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Applicant Name

Louisville Metro Housing Authority
Program/Activity Receiving Federal Grant Funding

Moving to Work Program

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

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

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

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

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



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

Name of Authorized Official

Manfred Reid

Title

Chairman of the Board

Signature



Date (mm/dd/yyyy)

4/16/2019

Previous edition is obsolete

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