

**Louisville Metro Housing Authority**

# **Moving to Work Annual Plan**

**Fiscal Year 2022**

**July 1, 2021 – June 30, 2022**

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**U.S. Department of Housing & Urban Development**

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# **I. Introduction**

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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 close to 14,000 low-income families with children, seniors, people with disabilities, and other individuals through its public housing, rental assistance voucher, and local, non-traditional 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 Fiscal Year 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 2022, i.e. the period from July 1, 2021 through June 30, 2022. 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 set a standard of operational excellence in providing quality, affordable housing opportunities for residents to achieve self-sufficiency and an enhanced quality of life, and collaborating with community partners to build strong, viable 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 of LMHA's MTW Annual Plans including the FY 2022 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. LMHA will also continue to utilize MTW flexibility and funding in the future as needed to respond to issues arising from the COVID-19 pandemic.

## 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 No.	MTW Activity
<i>Proposed Activities</i>	
2022-1	MTW Utility Allowances

<b>Activity No.</b>	<b>MTW Activity</b>
<b>2021-2</b>	Emergency Waivers
<b>2021-3</b>	Eviction Prevention – COVID-19 Relief
<b><i>Implemented Activities</i></b>	
<b>2021-1</b>	Preservation of Low-Income Homeownership Units
<b>2020-1</b>	Rent Simplification <ul style="list-style-type: none"> <li>• Financial Aid Disregard in Calculation of TTP; approved 2015</li> <li>• Elimination of the Earned Income Disregard; approved 2012</li> <li>• Earned Income Disregard for Elderly Families; approved 2008</li> <li>• Asset Policy; approved 2020</li> <li>• Exclusion of Adoption Assistance Payments; approved 2020</li> <li>• Exclusion of Full-time Student Income; approved 2020</li> <li>• Application of Payment Standards; approved 2020</li> <li>• Modified Standard Medical Deduction; approved 2021</li> </ul>
<b>2020-2</b>	Streamlined Flat Rent
<b>2020-3</b>	Local Forms
<b>2020-4</b>	FSS Program Enhancements
<b>2020-5</b>	Gap Financing
<b>2019-1</b>	Enhancements to Local Project-Based Voucher (PBV) Program
<b>2018-1</b>	Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing.
<b>2018-2</b>	HCV Owner Leasing Incentives (formerly Increasing Housing Options for Relocating Beecher Terrace Families)
<b>2015-1</b>	HCV Program - HUD/MDRC Rent Reform Demonstration
<b>2014-2</b>	HCV Program - Rent Increase Limit
<b>2014-1</b>	Public Housing - Sublease Programs <ul style="list-style-type: none"> <li>• Kentucky Spinal Cord Injury Research Center; approved FY 2013</li> <li>• YouthBuild Louisville; approved 2011</li> <li>• Family Scholar House; approved 2011</li> </ul>
<b>2011-1</b>	HCV Child-Care Deductions Policy
<b>2009-1</b>	Streamlined Development and Acquisition <ul style="list-style-type: none"> <li>• Simplification of the Public Housing Development Submittal; approved 2009</li> <li>• Acquisition of Mixed-Income Sites for Public Housing; approved 2011</li> </ul>
<b>2008-1</b>	Occupancy at Elderly Developments <ul style="list-style-type: none"> <li>• Local Definition of Elderly; approved 2008</li> <li>• Lease-up Incentives for New Residents at Dosker Manor; approved 2010</li> </ul>
<b>2007-1</b>	Streamlined Recertification Process

Activity No.	MTW Activity
2006-1	HCV Homeownership Program <ul style="list-style-type: none"> <li>Amount and Distribution of HCV Homeownership Assistance; approved 2006</li> <li>Exception Payment Standards; approved 2009</li> <li>Flexibility in Third-Party Verification; approved in 2009</li> </ul>
2005-1	MTW Special Referral Program ( <i>see Table 11 for detailed list of special referral allocations</i> )
<b>Not yet implemented</b>	
2011-2	Public Housing - Locally Defined Guidelines for Development, Maintenance, & Modernization
<b>Closed Out</b>	
2010-1	Public Housing - Sublease Agreement with Catholic Charities
45-2016	MTW Special Referral Program – Coalition for the Homeless “Move Up” Initiative
33-2012	Public Housing - Rents Set at 30% of Adjusted Income
24-2010	Public Housing - Increased Flat Rents for New Scattered Sites
21-2010	Public Housing - Occupancy Criteria Changes for New Scattered Sites - Mandatory Case Management
16-2009	Public Housing - Streamlined Demolition and Disposition Application Process for MTW Agencies
9-2007	Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites (Revised 2014, 2016)
5-2007	HCV Program - Spatial Deconstruction of HCV Assisted Units
2-1999	MTW Inspections Protocol

## D. FY 2022 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 2022. LMHA projects that 13,826 households will be served through the Agency’s rental assistance, public housing, and Local, Non-Traditional activities in FY 2022. As LMHA’s funding for FY 2022 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 2022 activities include:

- MTW Utility Allowance Activity:** In FY 2022, LMHA plans to use MTW authority to implement changes to its utility allowance (UA) policies for the Public Housing. Specifically, LMHA will eliminate the excess utility charges for Public Housing residents. There are a number of positive outcomes which are anticipated upon implementation of the MTW UA activity such as reducing LMHA administrative burdens around UA billing and collection and reducing utility costs for PH residents.
- The Emergency Waivers and Eviction Prevention activities were proposed in FY 2021 as an amendment to the LMHA’s previously approved FY 2021 plan. As LMHA has not received a response from HUD regarding this amendment, these activities have been included in the proposed activity section of this Plan.



- **Emergency Waivers:** The outbreak of COVID-19 places a substantial burden on housing authorities to respond to the needs of their participants while also maintaining compliance with program requirements. While the Coronavirus Aid, Relief and Economic Security (CARES) Act provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements, due to the duration of this pandemic, the backlog of transactions, inspections, and delayed reporting requirements continues to grow. To address these burdens, LMHA proposes to establish emergency waivers in response to emergencies, as declared by the applicable unit of government with jurisdiction over LMHA, including the authority to determine when to place and lift the waivers.
- **Eviction Prevention:** LMHA will work to address the short-term housing needs of low-income renters and homeowners impacted by COVID-19. As part of the Louisville Metro Office of Housing and Community Development (OHCD) Eviction Diversion Program, LMHA will allocate approximately \$2 million in MTW funds for eligible low-income families who are financially impacted by the COVID-19 pandemic. LMHA will work with OHCD to qualify and administer short-term emergency assistance for rent arrearages. LMHA will work with other partner agencies for mortgage arrearages.
- **Preservation of Low-Income Homeownership Units:** In FY 2022, LMHA is proposing an important change to this activity in order to minimize displacement of cost burdened low-income homeowners in Opportunity Zones where significant investments have been or will be made. LMHA will provide forgivable loans of up to \$25,000 to assist low-income homeowners to complete repairs needed to bring their homes into compliance with Housing Quality Standards. Thereafter, LMHA will provide traditional homeownership assistance payments to assist homeowners in maintaining the affordability of their homes.
- **Rent Policies:** LMHA will continue to implement several approved rent simplification policies, including a modified standard medical deduction, a revised asset policy, and the exclusion of full-time student income. In FY 2022, LMHA will also implement approved changes to the application of payment standards, which allow LMHA to apply the payment standard in effect at the family's last regular recertification when completing an interim recertification. Together, the rent simplification policies approved under Activity #2020-1 simplify and streamline the process of rent calculation, significantly reducing the administrative burden and shortening cycle times.
- **Local Forms:** Under this activity first approved in FY 2020, LMHA has developed and will continue to utilize local versions of HUD required forms to streamline processing, including local versions of the FSS Contract of Participation and PBV AHAP and HAP contracts. LMHA will continue to explore opportunities to develop additional local forms in FY 2022.
- **FSS Program Enhancements:** LMHA implemented several enhancements to its Family Self-Sufficiency (FSS) Program which were approved in FY 2020 and FY 2021, including changes to the Contract of Participation, the establishment of incentive payments, and modifications to enrollment requirements. These enhancements are designed to better assist participants in attaining self-sufficiency goals and streamline processes for administering staff. LMHA proposes to continue enhancing its FSS program in FY 2022 by adopting the following two new policies:
  - Use of FSS escrow forfeitures to fund goal-specific incentive payments disbursed to families who achieve the established interim goals. LMHA will continue to comply with

the regulatory requirements for monthly reporting of FSS escrow forfeitures on Form HUD-52681-B.

- Increase the cap on the amount of escrow to \$25,000 per household. This cap may be periodically reviewed and updated at LMHA's discretion. Incentive payments will continue to count toward the escrow cap.
- **Gap Financing Program:** Under this activity approved in FY 2020, LMHA will explore the use of MTW flexibility 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.
- **HCV Owner Leasing Incentives:** To encourage owner participation in the HCV Program and to increase the inventory of one-bedroom units within the Louisville Metro area, LMHA will continue to offer an incentive to owners who lease a one-bedroom unit to the LMHA's HCV Program for the first time. LMHA also continues to offer incentives to owners who agree to lease new units in the HCV program, including vacancy loss and damage loss payments, biennial HQS inspections and the ability to have pre-qualifying HQS inspections.
- **Preservation of Affordable Housing – Broader Use of Funds to Support Mixed Income Housing:** This activity allows LMHA to acquire unsubsidized units for development of mixed income housing. As these units will not receive ongoing operating subsidy, HUD approval of these acquisitions is not required. However, the units will still be targeted to households whose income does not exceed 80% of Area Median Income (AMI).
- **Enhancements to Local Project-Based Voucher (PBV) Program:** LMHA has adopted 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.
- **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 2022, LMHA anticipates that over 800 Housing Choice Vouchers will be utilized to assist these families in making strides toward self-sufficiency and increasing their housing choices. LMHA will add eight (8) new voucher allocations to the Special Referral Program, adding an additional 80 new vouchers under this activity. Specifically, LMHA will now partner with Louisville Metro Police Department, Boys' and Girls' Haven, Louisville Metro Government Office of Safe and Healthy Neighborhoods Kentuckiana Builds/Kentuckiana Works, Kentucky Youth Career Center/Kentuckiana Works, St. John Center, Zora's Cradle, and Goodwill Industries providing an allocation of 10 vouchers to each organization.
- **Self-Sufficiency Programs:** LMHA has implemented Homeownership, Special Referral and the Family Self-Sufficiency (FSS) 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 2022. 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. To support increasing demand, LMHA has hired additional full-time staff to support families interested in its homeownership programs.

- ***Elderly/Disabled Housing:*** LMHA will continue to use MTW flexibility in FY 2022 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 2022, LMHA will implement biennial recertifications for all HCV households and complete planning for the implementation of triennial recertifications in both HCV and PH. These policies were approved in FY 2020. 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:*** The HUD Rent Reform Demonstration will end in FY 2022, with the first cohort of study enrollees transitioning back to MTW rent policies starting in July 2021. The Study set 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.
- ***Units for Underserved Populations:*** In its efforts to provide units to underserved populations, LMHA will continue to provide the following housing opportunities through public housing sublease programs:
  - Fully accessible units to individuals with disabilities in partnership with the University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC), which transitioned from the University of Louisville's Frazier Rehab Institute in FY 2021. The program provides transitional housing for up to twelve months per family. With support from the KSCIRC social worker, sub-lessees are connected to community resources and support as well as financial assistance for their transition from the program.
  - 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.
  - Temporary housing for parents while they work to obtain a college degree through a partnership with Family Scholar House. Participants who successfully graduate from the program will receive a preference for admission to LMHA's Housing Choice Voucher Program as long as the participant was living in LMHA public housing (including PH/LIHTC housing) at the time of program completion.

Along with its MTW implementation activities, LMHA will implement other initiatives in FY 2022 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 redevelopment efforts in the Russell neighborhood in FY 2022, and anticipates completing Beecher Terrace Phase III construction, comprising 185 units, by the end of FY 2022. Additionally, the stabilization of Quinn Chapel and Louisville Central Community Centers' Business Plaza will be on-going in FY 2022.
- *Sheppard Square HOPE VI Revitalization:* LMHA is pursuing development of the outstanding homeownership units. Habitat for Humanity is under contract to develop five of the homeownership lots and has begun construction on one lot. Habitat may develop additional lots in the future. LMHA anticipates up to three closings will have taken place before the beginning of FY 2022.
- *Porter Paints:* LMHA has completed demolition of this former paint factory. A community planning effort was recently completed and conceptual plans for a new park with a mixed-used building, pavilion and other amenities has been developed. A grant application for gap funding was submitted to the James Graham Brown Foundation on March 1<sup>st</sup> and awards are anticipated to be announced in May 2021. Implementation of the plans is anticipated to begin in early FY2022.
- *H. Temple Spears:* This site comprises 65 LMHA public housing units. Occupancy rates were historically low due to marketing challenges related to the small size of the units. LMHA is planning to convert 24 of these units into 12 larger units to enhance marketability. Planning will continue throughout FY 2022, and renovation may also begin before the end of FY 2022. LMHA may hold additional units at the site offline for potential renovation.
- *Rental Assistance Demonstration Participation:* In FY 2022, LMHA will continue planning for its first RAD conversion of twenty-one (21) units at Beecher Terrace, which is expected to close in FY 2023. On October 25, 2019, HUD issued a Commitment to Enter into Housing Assistance Payments (CHAP) for these units. LMHA anticipates developing 21 new construction RAD units on the Beecher former public housing site as part of Phase IV of redevelopment, which is planned to include 130 units in total.
- LMHA will consider RAD for the mixed-finance developments which LMHA has obtained ownership. In the near term, LMHA will review RAD and other asset repositioning strategies for Park DuValle, which has exited its initial low-income housing tax credit period and is owned by LMHA, and for LMHA-owned Sheppard Square. LMHA will submit a Plan amendment if they choose to proceed with new RAD conversions in FY 2022. In the long-term, LMHA will also consider RAD conversions for other mixed finance developments, including Liberty Green, and its scattered site portfolio.

- ***Grants and Funding Opportunities*** – In FY 2022, LMHA will continue to administer existing grants, which include the FSS Coordinator ROSS grants and the Choice Neighborhoods Implementation and Supplemental grants. A grant application for gap funding for Beecher Terrace’s recreational amenities was submitted to the James Graham Brown Foundation on March 1, 2020. Awards are anticipated to be announced in May 2021. LMHA will review and potentially pursue any current or new grant opportunities that should become available during FY 2022. These include, but are not limited to, those which may allow the Authority to conduct master planning or redevelopment at its older housing stock, perform substantial upgrades or energy improvements to its properties, and/or provide additional supportive services to participants in its housing programs. Funds may be sought from federal, state and city sources, such as Community Development Block Grants or State Historic Tax Credits, as well as private foundations
- ***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 2022.

**Table 2: Planned New Public Housing Units in FY 2022**

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
<b>Total Public Housing Units to be Added in the Plan Year</b>							<b>0</b>			

If “Population Type is “Other” please describe:

N/A

#### ii. *Planned Public Housing Units to be Removed*

The units listed below were included as part of the FY 2021 MTW Plan; however, disposition applications have not yet been submitted (with the exception of Chestnut St.) and, as such, they are now anticipated to be removed in FY 2022.

**Table 3: Planned Public Housing Units to Be Removed in FY 2022**

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. These units are condos LMHA owns in a larger condo development.
Manslick KY001000034	16	LMHA plans to remove 16 public housing units at Manslick, due to excessive repairs needed. LMHA has determined that the cost of repair exceeds the cost of replacement and will request HUD approval to sell the units in FY 2022.
Chestnut St. KY001000017	3	Due to structural issues as well as damage from roof leakage, LMHA has determined that disposition is the most cost-effective option for this property. LMHA has submitted an application for disposition to HUD and is awaiting approval.
HOPE VI Scattered Sites KY001000034	26	Ten (10) units (W. Kentucky St.) are slated for removal and sale through competitive bid process which may be completed in FY 2022. LMHA will submit an application to dispose of an additional 16 units.

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Beecher Terrace KY001000002	21	RAD Conversion
<b>Total Public Housing Units to be Removed in the Plan Year</b>	<b>76</b>	

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

**Table 4: New Housing Choice Vouchers to be Project-Based in FY 2022**

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
Beecher III	61	No	New Construction – Family Housing
Donerail	14	No	New Construction – Family Housing
New Vision III	5	No	Substantial Rehab – Family Housing
Newbridge	7	No	Existing – Family Housing
Zion Manor Senior Housing II	34	No	New Construction – Senior Housing
	<b>121</b>	<b>Planned Total Vouchers to be Newly Project-Based</b>	

*iv. Planned Existing 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
Beecher I	114	Leased/Issued	No	New Construction – Senior Housing
Beecher II	43	Leased/Issued	No	New Construction – Family Housing
Newbridge Place	27	Leased/Issued	No	Existing – Family Housing
Market St. Apts	8	Leased/Issued	No	Existing – Family Housing
Opportunity East (I & II)	8	Leased/Issued	No	Existing – Family Housing
Roosevelt Apts	43	Leased/Issued	No	Existing – Family and Senior Housing
	<b>243</b>	<b>Planned Total Existing Project-Based Vouchers</b>		

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

Table 6 provides a summary of other activities currently planned by LMHA during FY 2022, including disposition, rehabilitation, and modernization activities. Additional activities may be added during the Plan year, subject to Board approval and any applicable HUD approvals.

**Table 6: Planned Other Changes to the MTW Housing Stock**

Property Name	Description
Dosker Manor	Seventeen (17) dwelling units in Building B will be permanently converted into electrical rooms in order to conduct the necessary electrical upgrades on that building. Additionally, approximately 20 units in Buildings A, B, and C will be held offline for domestic water supply and sanitation drain line replacement.
Holly Park	Twenty-four (24) vacant units will be held offline for renovation. LMHA will award a contract and begin work on this renovation project in FY 2022.
Scattered Sites (017)	Thirteen (13) vacant units will be held offline for renovation in FY 2022. LMHA will award a contract to complete renovations on nine of these units; four units will be renovated by LMHA Forced Account Crew.
Scattered Sites (034)	One (1) vacant unit will be held offline and undergo renovation completed by LMHA Forced Account Crew in FY 2022.
Avenue Plaza	Approximately 16 units will be held offline for domestic water supply and sanitation drain line replacement and bathroom upgrades.
H. Temple Spears	LMHA is holding 24 units offline, which it plans to convert into 12 larger-size units, with work commencing during FY 2022.
601 West Breckinridge	Former Louisville Housing Services Office will be converted into an apartment. LMHA anticipates awarding a contract to complete the conversion in FY 2022.
768 Barret Ave./801 Vine St.	LMHA plans to request approval to dispose of the former Section 8 office, a non-dwelling unit located at 768 Barret Ave./801 Vine St (AMP KY001000034). The Section 8 office has been re-located and the non-dwelling unit remains vacant pending disposition.

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

LMHA'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 2022 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. 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 Place	Replace Windows	\$ 3,508,307
		Roof Replacements Gutters, Soffits, Downspouts, Gables	
		Tuckpointing for 58 buildings	



Project Type	Site Name	Project Description	Total Estimated Budget
		Tree Trimming	
		Dwelling Equipment	
		HALO	
		Eviction Prevention Program	
Capital Improvements	Dosker Manor	Replace Domestic Water Supply/Sanitation drain lines	\$ 1,481,692
		Repair exterior and replace garage doors – service elevators	
		Automatic Door Closers (Required by Fire Marshall)	
		Dwelling Equipment	
		High Rise Security	
		HALO	
		Eviction Prevention Program	
		Resident Stipends	
Capital Improvements	St. Catherine Court	Paint	\$ 223,286
		Automatic Door Closers (required by Fire Marshal)	
		Dwelling Equipment – Ranges and Refrigerators	
		Hi-Rise Security	
		Eviction Prevention Program	
		Resident Stipends	
Capital Improvements	Avenue Plaza/550 Apt	Stairwell Lighting	\$ 1,591,747
		Remodel bathroom showers – Avenue	
		Paint Apartments – 550 Apartments	
		Replace Counter Tops – Kitchens – 550 Apartments	
		Tubs, Sinks, Bathroom Replacement – 550 Apartments	
		Replace Domestic Water/Sanitation Drain Lines – 550 Apt	
		Replace Fire Doors Ave Plaza and 550 Apts.	
		Automatic Door Closers (required by Fire Marshal)	
		Redo floor, ceiling, door, lights in laundry rm – 550 Apt	
		Playground Equipment – 550 Apartments	
		Freight Elevator Upgrade	
		Generator	
		Dwelling Equipment	
		Hi-Rise Security	

Project Type	Site Name	Project Description	Total Estimated Budget
		Eviction Prevention Program	
		Resident Stipends	
Capital Improvements	Scattered Site – 017	Abatement – painting and windows 17 #1 F.A.C.	\$ 1,136,040
		Renovation 1131 S 6 <sup>th</sup> Street – roof, tuckpoint, electrical, framing, plaster	
		1527 W. Catherine St. – Rehab unit 17 #1	
		A/C panel replacement and repairs 17 #2	
		Siding – Fegenbush – Whipps 17 #2	
		Erosion Repairs – Fegenbush – Whipps (hill erosion E. P.) 17 #2	
		Repair/Replace dumpster pads and paving – Noltemeyer 17 #2	
		Replace front/rear concrete porches – 2 houses Newburg 17 #2	
		Window replacement for all Newburg windows 17 #2	
		Replace siding and gutters 17 #2	
		Replace #1207 (2001 F250) with heavy duty pickup KY17	
		Replace #1228 (2002 Ram) with F250 pickup KY17	
		Dwelling Equipment – project 017	
Capital Improvements	Scattered Site – 034	Replace lighting in common areas – St Martins 34 #1 LED	\$ 463,736
		Replace HVAC – move to ground – 3931 3 <sup>rd</sup> St. 34 #1	
		Replace HVAC – 2704 Grand Ave 34 #1	
		Patch, seal, stripe parking lot at St Martin #34 #1	
		Pressure Washing Various Sites #34 #1	
		Kitchen and bath renovations – Bayberry 34 #2	
		Build Bridge – Taylorsville Rd. 34 #2	
		DDC Heating/Cooling Liberty Green Resource Center	
		Replace #1222 (2002 F250) with same	
		Replace #1254 (04 F250) with heavy duty pick up	
		Dwelling Equipment – project 034	
		Eviction Prevention Program 1-34	
Capital Improvements	Lourdes Hall	Flooring Hallways and Lobby	\$ 218,911
		Automatic Door Closers (required by Fire Marshal)	
		Tree Trimming	
		Dwelling Equipment	
		Hi-Rise Security	

Project Type	Site Name	Project Description	Total Estimated Budget
		Eviction Prevention Program	
		Resident Stipends	
Capital Improvements	Will E Seay Plaza	Automatic Door Closers (required by Fire Marshal)	\$ 329,000
		Kitchen Cabinets – 54 units	
Capital Improvements	Park DuValle	Mixed Finance Capital Contributions – Phase III	\$ 146,294
		Mixed Finance Capital Contributions – Phase IV	
Capital Services	Contracts	Environmental Consultant – Remediation Monitoring	\$ 688,000
		Annual Asbestos and Lead Removal Contract	
		Annual A/E Contract	
		Agency Wide Computer Software Replacement/ Annual Contract	
		Annual Microsoft Software	
Capital Services	Administrative Costs	Construction Administration – Direct Salaries	\$ 1,200,000
		Construction Administration 10% transfer	
		General Fund for Operations	
Total			\$10,987,013

## B. Leasing Information

### i. *Planned Number of Households Served*

**Table 8: Planned Number of Households Served**

<b>Planned Number of Households Served Through:</b>	<b>Planned Number of Unit Months Occupied/Leased</b>	<b>Planned Number of Households to be Served</b>
MTW Public Housing Units Leased	42,628	3,552
MTW Housing Choice Voucher (HCV) Units Utilized	120,623	10,052
Local, Non-Traditional : Tenant-Based	1,000	83
Local, Non-Traditional: Property-Based	1,284	107
Local, Non-Traditional: Homeownership	381	32
<b>Planned Total Households Served</b>	<b>165,916</b>	<b>13,826</b>

**Table 8A: Local, Non-Traditional Programs**

<b>Local, Non-Traditional Category</b>	<b>MTW Activity Name/Number</b>	<b>Planned Number of Unit Months Occupied/Leased</b>	<b>Planned Number of Households to be Served</b>
Property-Based	Activity #2014-1: Public Housing – Sublease Agreement with Family Scholar House, Kentucky Spinal Cord Injury Research Center, and Youth Build	192	16
Property-Based	Activity #2018-1: Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing	1,092	91
Tenant-Based	Activity #2021-3 Eviction Prevention – COVID-19 Relief	1,000	83
Homeownership	Activity #2021-1: Preservation of Low-Income Homeownership Units	381	32

**Table 9: Anticipated Issues and Possible Solutions Related to Leasing**

<b>Housing Program</b>	<b>Description of Anticipated Leasing Issues and Possible Solutions</b>
MTW Public Housing	<p>As detailed in LMHA’s Corrective Action Plan, LMHA will improve unit turnover and eliminate potential delays in re-leasing vacant units through the use of seven (7) dedicated vacancy preparation crews to ready units for new tenants. LMHA anticipates that vacancy preparation crews have the capacity to turn an estimated 42 units a month, consistent with average number of tenant move-outs per month. In addition to vacancy preparation crews, LMHA began a pilot to use existing Force Account Crews to complete substantial renovations so that the units are ready for occupancy.</p> <p>Additionally, LMHA has established a preference for homeless families referred by the Family Health Centers of Louisville’s Continuum of Care Common Assessment Team. To house these applicants more quickly, the Common Assessment Team completes initial screening elements and refers homeless families to LMHA.</p>
MTW Housing Choice Voucher	<p>LMHA has established a preference for homeless families in the HCV program, in addition to the Public Housing program. LMHA receives referrals from the Common Assessment Team of homeless families in order to streamline admissions to the HCV program.</p> <p>In addition to streamlining admissions, LMHA will continue to provide owner incentives under Activity 2018-2 for leasing new units to HCV participants as well as payments for vacancy and damage loss payments.</p> <p>To further support admissions and leasing, LMHA will continue to utilize the voucher tracking tool to survey “shopping” voucher recipients. This tool is intended to assist LMHA in understanding obstacles to leasing and develop a comprehensive plan to address such obstacles.</p>
Local, Non-Traditional	<p>As proposed in the amendment to the FY 2021 MTW Plan, LMHA planned to assist a total of 500 households in FY 2021 through Activity #2021 Eviction Prevention – COVID-19 Relief. However, the FY 2021 Plan amendment had not yet been approved. Accordingly, LMHA has adjusted the timeframe for this activity and anticipates approximately half of the 500 total households will be assisted in FY 2022.</p>

## **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 2022**

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	6,944	Open	N/A
Federal MTW Project-Based Voucher Program	PBV Waiting List	300	Open	Yes
Federal MTW Public Housing Units	Site-Based	3,269	Open	N/A
Federal MTW Public Housing Units	Community-Wide	3,601	Open	N/A
Project Based Local Non-Traditional MTW Housing Assistance	Program Specific	3	Open	N/A

**Description of any duplication of applicants across waiting lists:**

As LMHA maintains separate HCV, Public Housing and PBV wait lists, applicants may apply and be on multiple waiting lists.

*ii. Planned Changes to Waiting List in FY 2022*

Waiting List Name	Description of Planned Changes to Waiting List
Federal MTW Housing Choice Voucher Program and Federal MTW Public Housing Units	<p>LMHA has entered into an agreement to receive applications referred from the Family Health Centers Common Assessment Team for families currently experiencing homelessness. LMHA has updated the waiting list policy in the Administrative Plan and ACOP to establish preferences for applicants referred from the Common Assessment Team.</p> <p>The Common Assessment Team will conduct initial screening of the family and provide LMHA with their completed application and supporting documents. Upon referral, LMHA will complete the final screening elements (including sex offender, outstanding debts and adverse tenancy). LMHA expects this streamlined referral process will reduce the time it takes to house applicants and may also decrease time on the waiting list.</p>
Federal MTW Project-Based Voucher Program	<p>LMHA will use separate waiting lists for sets of PBV units. As applicable, the waiting list may establish criteria or preferences for occupancy of particular units.</p> <p>Original Beecher Terrace residents who moved or were relocated as a result of the CNI redevelopment of the site will be given a lifetime preference for project-based on- and off-site replacement units.</p>

### III. Proposed MTW Activities

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LMHA is proposing one new activity in the FY 2022 MTW Plan, Activity #2022-1: MTW Utility Allowances. However, two activities proposed in an amendment to the FY 2021 MTW Plan are also included in the Proposed Activities section, as HUD had not yet taken action on the amendment to the FY 2021 MTW Plan

#### Activity #2022-1: MTW Utility Allowances

##### Activity Description

LMHA plans to use MTW authority to implement changes to its utility allowance (UA) policies for the Public Housing program. There are a number of positive outcomes which are anticipated upon implementation of the MTW UA activity such as reducing LMHA administrative burdens around UA billing and collection and reducing utility costs for tenants. In FY 2022, LMHA proposes the following as part of its MTW UA activity:

- **Elimination of PH Excess Utility Consumption Surcharges:** Under existing HUD regulations, public housing families who reside in units with utilities furnished by LMHA are charged for utility consumption in excess of the established utility allowance schedule. On a quarterly basis, LMHA monitors individual check-meters for applicable units and invoices families whose consumption exceeds the established consumption allowance. If the charge for excess utility consumption exceeds \$10, LMHA must enter into a repayment agreement with the family, monitor payment and follow-up with lease enforcement for non-payment.

Using its MTW authority, LMHA is proposing to eliminate the requirement to bill for excess utility consumption as the current process is administratively burdensome and diverts scarce resources away from core property management functions. Upon approval, LMHA will pilot this change for 12 to 18 months to determine if the desired outcomes for improvement in property management and service to residents justify the reduction in utility revenue.

In FY 2022, LMHA may investigate and consider providing an internet UA for HCV participants. LMHA will submit a plan amendment when and if such a revision is proposed.

##### Statutory Objective and Impact

By eliminating surcharges for excess utility consumption, LMHA will reduce costs and achieve greater cost effectiveness in federal expenditures and give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient. Affected families in public housing would save on average \$115 a year as a result of eliminating excess utility surcharges, while reducing the administrative burden on staff to have to read meters, bill and collect for excess utility consumption costs.

##### Implementation

Upon HUD approval, LMHA will eliminate excess utility surcharges in the Public Housing program.

##### Metrics

LMHA intends to utilize the following metrics for this activity. LMHA will utilize internal reporting systems to collect and analyze data on the number of households impacted and other relevant information.

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease)*	Total Cost of Task: \$58,690  Hourly Rate: \$28.43  Number of hours to (complete task): 0.636  Total number of (tasks to complete): 3,244	Total Cost of Task: \$0  Hourly Rate: \$28.43  Number of hours to (complete task): 0  Total number of (tasks to complete): 0		
<i>* Accounts for cost savings realized by eliminating billing for excess utility consumption in Public Housing.</i>				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease)*	Total time to complete task: 2,064 hours  Number of hours to (complete task): 0.636  Total number of (tasks to complete): 3,244	Total time to complete task: 0 hours  Number of hours to (complete task): 0  Total number of (tasks to complete): 0		
<i>* Accounts for time savings realized by eliminating billing for excess utility consumption in Public Housing.</i>				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	Not tracked	TBD		

### **Cost Implications**

The impact on PH revenue related to removal of excess utility consumption charges is \$88,502. LMHA has considered these additional costs in its budget for FY 2022.

### **Need/Justification for MTW Flexibility**



As found in the MTW Agreement Attachment C, Section C. 11, with respect to public housing, this activity requires a waiver of certain provisions of Sections 3(a)(2) of the 1937 act and 24 CFR 5.603, 5.628, 5.632, 5.634 and 966 Subpart A.

## **Additional Information for Rent Reform Activities**

### **Impact Analysis**

- *Impact on Removal of Excess Utility Consumption Charges:* Out of pocket costs for tenants will decrease by approximately \$115 per year for affected families as a result of the elimination of the excess utility consumption charge while LMHA revenue will decrease \$88,502. However, if labor costs associated with billing for excess utility consumption are deducted, the net impact of eliminating this requirement is \$29,812. While LMHA will not realize a labor savings of \$58,690, staff time will be diverted to under-resourced property management functions resulting in increased customer service, improved maintenance turn-around time and timely transactions.

<b>Billing Description</b>	<b>Annual Amount</b>
Total Excess Utility Consumption Collected	\$88,502
Estimated Labor Cost to Billing & Collection	\$58,690
Net Impact	\$29,812

### **Hardship Case Criteria**

As there are no negative consequences for PH participants when implementing the MTW UA activity, hardship is not applicable.

### **Description of Annual Reevaluation**

- *Excess Utility Consumption:* LMHA will perform an analysis to determine if funding constraints arise as a result of the elimination of these surcharges, and also evaluate the timeliness of maintenance repairs and regular recertifications to determine if the resources have been re-deployed appropriately.

### **Transition Period**

- *Excess Utility Consumption:* LMHA will discontinue excess utility consumption charges on the first full month of the fiscal year following HUD approval of the Plan.

## IV. Approved MTW Activities

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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 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 that 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 2022 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 2022, LMHA will allocate an additional 80 vouchers under this activity. Six (6) local, non-profit social services organizations and two (2) local government agencies will receive an allocation of ten (10) vouchers each. LMHA will monitor utilization and may re-allocate the vouchers if utilization is below the allocated number of vouchers.

### **Planned Changes to Metrics/Data Collection**

LMHA updated benchmarks for the following metrics to reflect the additional allocation of 80 vouchers in FY 2022 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

These updated metrics assume 100% voucher utilization.

### **Metrics**

<i>CE #1: Agency Cost Savings*</i>				
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>				
<b>CE #2: Staff Time Savings*</b>				
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>				
<b>CE #4: Increase in Resources Leveraged</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$0		
<b>SS #1: Increase in Household (HH) Income</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of HHs affected by this policy in dollars (increase).	<b>FY 2016:</b> \$4,108	\$8,000		
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full- Time or Part-Time	<b>As of FY 2016:</b> 90 (32% of 279 HHs)	399 (47% of 849 HHs)		
Enrolled in an Educational Program	<b>As of FY 2018:</b> 2 HHs have full-time adult students	2 HHs have full-time adult students		
Enrolled in Job Training Program	Not tracked	Not tracked		
Unemployed	<b>As of FY 2016:</b> 189 (68% of 279 HHs)	450 (53% of 849 HHs)		
<b>SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF)</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# Of HHs receiving TANF assistance (decrease).	<b>FY 2016:</b> 54 (19% of 279 HHs)	161 (19% of 849 HHs)		
<b>SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# of HHs receiving services aimed to increase self-sufficiency (increase).	<b>As of FY 2016*:</b> 13 (5% of 279 HHs)	43 (5% of 849 HHs)		
<i>* LMHA tracks FSS participation for this metric. The special referral partner may offer additional self-sufficiency services.</i>				
<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households (HHs)</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Average amount of Housing Choice subsidies per HH affected by this policy in dollars (decrease).	<b>As of FY 2016:</b> \$617	\$617		
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
PHA rental revenue in dollars (increase).	As of FY 2019 \$267	\$272		
<i>*Rental revenue reflects TTP.</i>				
<b>SS #8: Households Transitioned to Self-Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	<b>As of FY 2016:</b> 32 (11% of 279 HHs)	93 (11% of 849 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>				
<b>HC #3: Decrease in Wait List Time</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average applicant time on wait list in months (decrease).	<b>As of FY 2016:</b> <1 month	<1 month		

### Planned Significant Changes

No significant changes are planned.

**Table 11: LMHA Special Referral MTW Voucher Programs FY 2022**

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; Scattered	2005	2005; 22 2021: 10  Total: 32	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 high. This activity has increased housing choices and the cost effectiveness of federal funds. The Center for Women and Families will also provide referrals for up to 10 HCVs for scattered site units to residents of public housing who are victims covered by VAWA when a public housing unit is not readily available for transfer.	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	Scattered Site Locations	2015	2015; 50 2021: 10  Total: 60	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	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
				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 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 2019; 1  Total: 6	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	Scattered Site Locations	2016	2016; 10 2017; 60 2021: 10  Total: 80	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. Eighty (80) vouchers are allocated to referrals from ChooseWell Communities.	Full portability upon program completion	No	No: Traditional inspection protocol.
Coalition for the Homeless	Scattered Site Locations (Rapid Re-housing)	2012	2012; 10 2013; 10  Total: 20	Vouchers are allocated to Coalition for the Homeless for homeless families with children.	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
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 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.	Full portability upon program completion	Yes	No: Traditional inspection protocol.
Family & Children's Place	Scattered Site Locations	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 Stoddard Johnston Scholar House location.			
	Parkland	2013	2013; 53	Vouchers are allocated to the Family Scholar House at their Parkland Scholar House facility.			



Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	Riverport	2017	2017; 64	Vouchers are allocated to the Family Scholar House's Riverport Scholar House facility.			
	Scattered Site Locations	2021	2021: 10				
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"> <li>• A safe, drug and alcohol-free community living environment;</li> <li>• Intensive case management;</li> <li>• Group and individual mental health counseling;</li> <li>• Intensive outpatient substance abuse treatment;</li> <li>• Life skills education; and,</li> <li>• Transportation assistance.</li> </ul> <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	Scattered Site Locations	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"> <li>1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals</li> <li>2. Persons with severe mental illness who are at risk of institutionalization</li> <li>3. Persons with disabilities exiting nursing homes and intermediate care facilities for individuals with intellectual or other developmental disabilities</li> </ol>	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
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	
	Scattered Site Locations	2016	2016; 10 2021: 10  Total: 20	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	
Louisville Metro Government Office of Resilience and Community Services	Scattered Site Locations	2019	2019; 10 2021; 20  Total: 30	LMHA will allocate vouchers to individuals and families experiencing homelessness participating in employment readiness programming. The Office of Resilience and Community Services (RCS) connects individuals and families 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 attainment of self-sufficiency for program participants.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Home of the Innocents	Home of the Innocents	2019	2019; 10 2021: 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</i>	Full portability upon	No	Yes: Inspection with new

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
			Total: 20	<i>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.	program completion		occupant and once per year concurrently.
Volunteers of America Mid-States	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 participating in the Volunteers of America Mid-States’ Transitional Living for Woman program and who meet eligibility requirements in Louisville.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Catholic Charities of Louisville	Scattered Site Locations	2021	2021; 20	Catholic Charities will provide self-sufficiency and job training programming to two groups: victims of human trafficking and individuals in the Migration and Refugee Services. These two groups are often overlapping.	Full portability upon program completion	No	No: Traditional inspection protocol.
Joshua Community Connectors/ Joshua Tabernacle Missionary Baptist Church	Scattered Site Locations	2021	2021; 20	LMHA will allocate vouchers to clients of the Russell neighborhood that are at risk of homelessness. Joshua Community Connectors provide case management and referral to physical and mental health providers, employment readiness training, and wraparound social services over the course of a 12-month period.	Full portability upon program completion	No	No: Traditional inspection protocol
Mattingly Edge	Scattered Site Locations	2021	2021; 10	Vouchers are allocated to Mattingly Edge which provides housing location and support services for individuals with intellectual and/or physical disabilities who are transitioning out of congregated residential settings.	Full portability upon program completion	No	No: Traditional inspection protocol
My Chosen People	Scattered Site Locations	2021	2021; 10	Vouchers are allocated to My Chosen People which provides mental health treatment, substance abuse treatment, employment search and placement, and case management to pregnant women and individuals released from incarceration.	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
Boys and Girls Haven	Scattered Site Locations	2022	2022; 10	LMHA will allocate vouchers to the Boys and Girls Haven Independence Readiness (IR) Program, which provides intensive case management and life skills preparedness for foster youth aged 18 – 21 years old and who are transitioning out of residential programming, transitional living, or therapeutic foster care.	Full portability upon program completion	No	No: Traditional inspection protocol
Kentuckiana Builds/Kentuckiana Works	Scattered Site Locations	2022	2022; 10	LMHA will allocate vouchers to Kentuckiana Work's Kentuckiana Builds, which provides employment readiness services in partnership with the Louisville Urban League and the state Department of Education. Participants are generally over the age of 24, are housing insecure, and participate in construction training in addition to wraparound services.	Full portability upon program completion	No	No: Traditional inspection protocol
Kentucky Youth Career Center/Kentuckiana Works	Scattered Site Locations	2022	2022: 10	LMHA will allocate vouchers to the Kentuckiana Work's Kentucky Youth Career Center (KYCC), which provides education and employment services to young adults ages 16 – 24 experiencing barriers such as lack of high school diploma or GED, court-involvement, and/or homelessness. KYCC provides case management, supportive services, and incentives to help young adults reach their goals. For example, programs include Workforce Education, internal or links to external occupational skills certification programs, and GED services.	Full portability upon program completion	No	No: Traditional inspection protocol
Louisville Metro Government Office of Safe and Healthy Neighborhoods	Scattered Sites	2022	2022: 10	Vouchers are to be utilized for participants who are in unstable and/or unsafe housing conditions due to being victims of gun violence. The program includes wraparound services from law enforcement, social services providers, and community members.	Full portability upon program completion	No	No Traditional inspection protocol.
St. John Center	Scattered Site Locations	2022	2022;10	LMHA will allocate vouchers to the St. John Center, which provides case management and housing location services for individuals aged 24-55 that are experiencing homelessness.	Full portability upon	No	No: Traditional inspection protocol

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					program completion		
Zora's Cradle	Scattered Site Locations	2022	2022;10	LMHA will allocate vouchers to Zora's Cradle, which provides case management, therapeutic services, and assistance with securing community-based resources to pregnant or post-partum women who are currently or at risk of experiencing homelessness.	Full portability upon program completion	No	No: Traditional inspection protocol
Goodwill Industries of Kentucky, Inc.	Scattered Site Locations	2022	2022;10	LMHA will allocate vouchers to the Ignite Program, a partnership between Goodwill and Jefferson Community and Technical College, which provides job training and supportive services for at-risk youth ages 18-24.	Full portability upon program completion	No	No: Traditional inspection protocol
Louisville Metro Police Department (LMPD)	Scattered Site Locations	2022	2022; 10	LMHA will allocate vouchers to LMPD for the relocation of victims or witnesses of criminal activity.	Full portability upon program completion	No	No: Traditional inspection protocol

## **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**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

LMHA will update the benchmarks for both HC #5 and HC #6 to 15 households, as LMHA has exceeded the previous benchmark of four (4) households in prior fiscal years.

## Metrics

<i><b>CE #1: Agency Cost Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	<b>As of FY 2008:</b> \$179 (12 verifications x 0.5 hours x \$29.78/hour)	\$0		
<i><b>CE #2: Staff Time Savings</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	<b>As of FY 2008:</b> 6 hours (12 verifications x 0.5 hours)	0 hours		
<i><b>CE #3: Decrease in Error Rate of Task Execution</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease)	<b>As of FY 2008:</b> Not tracked	N/A (Task no longer conducted)		
<i><b>HC #5: Increase in Resident Mobility</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	15		
<i><b>HC #6: Increase in Homeownership Opportunities</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households that purchased a home because of the activity (increase).	0	15		

## 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 in Public Housing Program FY 2008; amended FY 2012; amended FY 2020.

### **Description/Update**

This activity allows LMHA to conduct a re-certification of Housing Choice Voucher (HCV) and Public Housing (PH) households once every two years instead of annually. This will include households in the Project-Based Voucher (PBV) program.

Under this activity as originally implemented, 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). 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.

In FY 2020, LMHA amended this activity in several ways to further streamline the recertification process, which are detailed below. To date, the following activity amendments have been implemented:

- LMHA expanded the biennial recertification process to all Public Housing (PH) households. LMHA has implemented this process by scheduling one half of Public Housing households to complete recertifications on the odd years and the other half on the even years. LMHA also received approval to expand this flexibility to the Housing Choice Voucher program, but this change has not yet been implemented.
- Public Housing households on flat rent are to be recertified once every three years. Households who report zero income are recertified every 90 days. Households currently on triennial recertifications will generally not have their recertification dates changed.
- LMHA also added a further streamlining benefit to the recertification process by accepting documents that are not more than 120 days old when received by LMHA.

LMHA also received approval to allow HCV and PH households whose only source of income is from SS, SSI and/or pension to recertify once every three years. These changes have not yet been implemented; in FY 2022, LMHA will plan for the implementation of these changes.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection are planned.

### **Metrics**



<b>CE #1: Agency Cost Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Total Cost of Task prior to implementation: \$304,888  Number of Regular Recertifications PH: 2,672  HCV: 8,155  Time per recertification: 1 hour  Hourly rate: \$28.16	Total Cost of Task: \$140,997  Number of Regular Recertifications PH: 1,153  HCV: 3,854  Time per recertification: 1 hour  Hourly rate: \$28.16		
<i>*Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications.</i>				
<b>CE #2: Staff Time Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	Total time to complete the task prior to 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: 5,007 hours  Number of Regular Recertifications PH: 1,153  HCV: 3,854  Time per recertification: 1 hour		
<i>*Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications</i>				
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase).	PH: \$210  HCV: \$267	PH: \$233  HCV: \$261		

*\*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. See Activity 2019-1 regarding elderly families and the Project Based Program.

### **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 at Dosker Manor.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection are planned.

### **Metrics**

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

<b><i>HC #4: Displacement Prevention</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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		
<b><i>HC #5: Increase in Resident Mobility</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity 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.
- Acquisition of Mixed-Income Sites for PBV development and/or preservation: Approved and implemented FY 2020.

### **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 uses 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 2022.

In FY 2020, LMHA, through its affiliate LMHA Development Corporation (LMHADC), extended the scope of this activity to include acquisition of sites and/or units for PBV development and/or preservation.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection are planned.

## Metrics

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

### **Planned Non-Significant Changes**

To increase the number of households who benefit from this policy, LMHA will modify the employment requirement in this activity. When determining income eligibility, families will qualify for the deduction of child-care expenses if the head, co-head and/or spouse is employed at the time of eligibility screening. Families will no longer be required to demonstrate a year of work history.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection are planned.

### **Metrics**

<i>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Housing Choice subsidy per household affected by this policy in dollars (decrease).	<b>As of FY 2010:</b> No HHs affected by policy	\$542		
<i>SS #7: Increase in Agency Rental Revenue*</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase)	As of FY 2019** \$267	\$272		
*Average 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**

- Public Housing Sublease Agreement with Family Scholar House: Proposed and approved in FY 2011.
- Accessible Units Sublease Agreement with University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC): Approved and implemented FY 2014. *(Transitioned from University of Louisville's Frazier Rehab Institute in FY 2021)*
- 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:

- ***Family Scholar House***  
LMHA maintains a partnership with the Family Scholar House to provide public housing to parents while they work to obtain a college degree. To be eligible for residency at the Downtown Scholar House, the head of household must have a high school diploma or GED and be willing to enroll in a degree-granting program at an accredited post-secondary institution as a full-time student. Eligibility is limited to households including no more than one adult family member. Families interested in applying for or transferring to a Family Scholar House unit contact the Family Scholar House directly for additional eligibility and screening requirements. Family Scholar House public housing units provide temporary housing to families actively participating in the Scholar House's programming. Families must relinquish their unit when they graduate from or otherwise terminate their participation in the Scholar House's programming. Participants who successfully graduate from the program will receive a preference for admission to LMHA's Housing Choice Voucher Program as long as the participant was living in LMHA public housing (including PH/LIHTC housing) at the time of program completion.
- ***University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC)***  
Fully accessible units are subleased as temporary housing for Spinal Cord Injury (SCI) research participants. The units are transitional housing provided for up to twelve (12) months per family. KSCIRC 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). KSCIRC leases the apartments from LMHA and will pay monthly rent of \$235 per month (or roughly 30% of monthly SSI for one person). KSCIRC uses a modified version of LMHA's public housing lease as its tenant sublease. KSCIRC has a full-time social worker who is responsible for connecting SCI research participants with applicable community resources and supports as well as financial assistance grants/opportunities to assist households in leaving the program.
- ***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.

In FY 2022, LMHA anticipates utilizing two (2) public housing units for the University of Louisville's Kentucky Spinal Cord Injury Research Center, three (3) units for the YouthBuild Louisville program, and eleven (11) units for Family Scholar House clients.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

### Metrics

<b><i>CE #2: Staff Time Savings*</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	0 hours	N/A		
<i>*There are no staff savings associated with this activity</i>				
<b><i>SS #1: Increase in Household Income*</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	0	N/A		
<i>*Clients in these programs are not expected to have an increase in income due to their education/training focus and/or population served.</i>				
<b><i>SS #3: Increase in Positive Outcomes in Employment Status</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Employed Full-Time	<b>As of FY2014:</b> 0	1		
Employed Part-Time	<b>As of FY2014:</b> 0	3		

Enrolled in an Educational Program	<b>As of FY2014: 0</b>	10		
Enrolled in a Job Training Program	<b>As of FY2014: 0</b>	3		
Unemployed	<b>As of FY2014: 0</b>	12		
Other	N/A	N/A		
<b><i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	<b>As of FY 2014: 0</b>	16		
<b><i>SS #8: Households Transitioned to Self Sufficiency*</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	<b>As of FY 2014: 0</b>	3		
<i>*Self-Sufficiency is defined as a participant exiting the program for any other reason than termination of subsidy/participation.</i>				
<b><i>HC #1: Additional Units of Housing Made Available</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).	<b>As of FY 2014: 0</b>	16		
<b><i>HC #5: Increase in Resident Mobility</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	<b>As of FY 2014: 0</b>	16		

### **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, which applies to the Housing Choice Voucher (HCV) program, LMHA places a 2% cap on annual contract rent increases for units where the tenant is already receiving 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. This will also apply to the Project-Based Voucher (PBV) program.

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

No changes to metrics/data collection 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 Housing Choice 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.</i>				
<i>**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.

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

This study is scheduled to end in FY 2022. As enrollment began July 2015 and was completed January 2016, LMHA will begin transitioning study participants to standard MTW rent policies beginning July 2021 and completing the transition in January 2022. Prior to the end of their participation in the study, MDRC will comply with the Study's requirements for notice and transition of study participants back to standard MTW rent policies. This activity will be closed out in the FY 2022 MTW Report.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

### Metrics

<i>CE #1: Agency Cost Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<b><i>Cost Per Annual Certification</i></b> Total cost of task in dollars (decrease).	<b>As of FY2015:</b>  <b>Alt Rent Group:</b> \$54,920 (1 annual cert x 1,000 households x \$54.92/cert)  <b>Control Group:</b> \$54,920 (1 annual cert x 1,000 households x \$54.92/cert)  <b>Per annual cert cost:</b> \$54.92 (\$50.14 staff cost (2 hours x \$25.07/hour) + \$4.78 (mail +	<b>Alt Rent Group (Non-Triennial Cert Years):</b> \$0 (0 certs x \$0 per cert)  <b>Alt Rent Group (Triennial Cert Years):</b> \$30,550 (500 certs x \$61.10)  <b>Control Group (All Years):</b> \$35,621 (583 certs x \$61.10)  <b>Cost per annual cert:</b> \$61.10		

	reproduction costs))	(\$56.32 staff cost (2 hours x \$28.16/hour) + \$4.78 (mail + reproduction costs))		
<b>Cost per Full Interim Certification*</b> Total cost of task in dollars (decrease).	<b>As of FY2015:</b>  <b>Alt Rent Group:</b> \$75,220 (2 interim certs * 1,000 HHs \$37.61/cert)  <b>Control Group:</b> \$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.)	<b>Alt Rent Group:</b> \$23,570 (558 certs x \$42.24/cert)  <b>Control Group:</b> \$18,712 (443 certs x \$42.24/cert)  <b>Per interim cert cost:</b> \$42.24 (staff cost of \$28.16/hour x 1.5 hours)		
<b>Cost per Streamlined Interim Certification*</b> Total cost of task in dollars (decrease).	<b>As of FY2015:</b>  <b>Alt Rent Group:</b> \$75,220 (2 traditional interim certs per household x 1,000 households x \$37.61/cert)  <b>Per traditional interim cert cost:</b> \$37.61 (staff cost of \$25.07/hour x 1.5 hours)	<b>Alt Rent Group:</b> \$14,080 (500 certs x \$28.16/cert)  <b>Per streamlined interim cert cost:</b> \$28.16 (staff cost of \$28.16/hour x 1.0 hours)		
*LMHA is not currently tracking traditional and streamlined interim certifications separately. All interim certifications have been reported as traditional interim certifications.				
<b>Cost of Rent Calculation</b> Total cost of task in dollars (decrease).	<b>As of FY2015:</b>  <b>Alt Rent Group:</b> \$25,070 (1,000 households x \$25.07 per rent calculation)  <b>Control Group:</b> \$25,070 (1,000 households x \$25.07 per rent calculation)	<b>Alt Rent Group (Non-Triennial Cert Year):</b> \$0 (0 rent calculations x \$28.16 per cert)  <b>(Triennial Cert Years):</b> \$14,080 (500 rent calculations x 1.0 staff hours x \$28.16/hour)		

	<b>Per rent calculation cost:</b> \$25.07 (staff cost of \$25.07/hour x 1.0 hours)	<b>Control Group (All Years):</b> \$16,417 (583 rent calculations x 1.0 staff hours x \$28.16/hour)		
<b>Cost to Determine Income from Assets</b> Total cost of task in dollars (decrease).	<b>As of FY 2015:</b>  <b>Alt Rent Group:</b> \$13 (2 households (0.22% x 1,000 households) x \$6.27 per asset income determination)  <b>Control Group:</b> \$13 (2 households (0.22% x 1,000 HHs) x \$6.27 per asset income determination)  <b>Per asset income            determination            cost:</b> \$6.27 (staff cost of \$25.07/hour x 0.25 hours)	<b>Alt Rent Group (Non-Triennial Cert Years):</b> \$0 (0 household x \$28.16 per staff hour x 0.25 hours)  <b>Alt Rent Group (Triennial Cert Years):</b> \$7 (1 household x \$28.16 per staff hour x 0.25 hours)  <b>Control Group (All Years):</b> \$7 (1 households x \$28.16 per staff hour x 0.25 hours)		
<b>CE #2: Staff Time Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Time to Complete Annual Certification</b> Total time to complete the task in staff hours (decrease).	<b>As of FY 2015:</b>  <b>Alt Rent Group:</b> 2,000 hours (1,000 households x 2.0 hours per annual cert)  <b>Control Group:</b> 2,000 hours (1,000 households x 2.0 hours per annual cert)	<b>Alt Rent Group (Non-Triennial Cert Years):</b> 0 hours (0 certs x 2 hours/cert)  <b>Alt Rent Group (Triennial Cert Years):</b> 1,000 hours (500 households x 2.0 hours/cert)  <b>Control Group (All Years):</b> 1,166 hours (583 households x 2.0 hours/cert)		
<b>Time to Determine Tenant Rent</b> Total time to complete the task in staff hours (decrease).	<b>As of FY 2015:</b>	<b>Alt Rent Group (Non-Triennial Cert Year):</b> \$0		

	<b>Alt Rent Group:</b> 1,000 hours (1,000 households x 1.0 hours per tenant rent determination)  <b>Control Group:</b> 1,000 hours (1,000 households x 1.0 hours per tenant rent determination)	(0 rent calculations x 1 hour/determination)  <b>(Triennial Cert Years):</b> 500 hours (500 determinations x 1.0 hour/determination)  <b>Control Group (All Years):</b> 583 hours (583 determinations x 1.0 hour/determination)		
<i>*Includes regular recertifications; interim recertifications and hardship requests are excluded.</i>				
<b>Time to Determine Utility Allowance</b> Total time to complete the task in staff hours (decrease).	<b>As of FY 2015:</b>  <b>Alt Rent Group:</b> 250 hours (1,000 households x 0.25 hours per UA determination)  <b>Control Group:</b> 250 hours (1,000 households x 0.25 hours per UA determination)	<b>Alt Rent Group (Non-Triennial Cert Year):</b> \$0 (0 rent calculations x 0.08 hour/determination)  <b>(Triennial Cert Years):</b> 40 hours (500 determinations x 0.08 hours per determination)  <b>Control Group (All Years):</b> 146 hours (583 determinations x 0.25 hours per determination)		
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Average Error Rate in Determining TTP</b> Average error rate in completing a task as a percentage (decrease).	<b>As of FY2015:</b> Not tracked	Not determined		
<b>Average Error Rate in Determining Utility Allowance</b>	<b>As of FY2015:</b> Not tracked	Not determined		



Average error rate in completing a task as a percentage (decrease).				
<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	<b>As of FY2016:</b> \$7,195	<b>Alt Rent Group:</b> \$12,000  <b>Control Group:</b> \$14,000		
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Employed Full-Time*	<b>As of FY 2018:</b>  <b>Alt Rent Group:</b> 483 (80% of 604 households)  <b>Control Group:</b> 316 (45% of 700 households)	<b>Alt Rent Group:</b> 400 (80% of 500 households)  <b>Control Group:</b> 262 (45% of 583 households)		
Employed Part-Time*	<b>As of FY 2015:</b> Not tracked	Not Tracked		
Enrolled in an Educational Program	<b>As of FY 2018:</b>  <b>Alt Rent Group:</b> 72 households  <b>Control Group:</b> 49 households	<b>Alt Rent Group:</b> 72 households  <b>Control Group:</b> 49 households		
Enrolled in a Job Training Program	<b>As of FY 2015:</b> Not tracked	<b>Alt Rent Group:</b> Not Tracked  <b>Control Group:</b> Not Tracked		
Unemployed	<b>As of FY 2015:</b> Not tracked	<b>Alt Rent Group:</b> 105 (21% of 500 households)  <b>Control Group:</b> 350 (60% of 583 households)		
Other	<b>As of FY 2015:</b> Not tracked	<b>Alt Rent Group:</b> 0  <b>Control Group:</b> 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.				

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	<b>As of FY 2016:</b> 69 (4% of 1,637 households)	<b>Alt Rent Group:</b> 25 (5% of 500 households)  <b>Control Group:</b> 23 (4% of 583 households)		
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	<b>As of FY 2015:</b>  <b>Alt Rent Group:</b> 0 (0% of 1,0000 households)  <b>Control Group:</b> 0 (0% of 1,000 households)	<b>Alt Rent Group:</b> 5 (1% of 500 households)  <b>Control Group:</b> 12 (2% of 583 households)		
<i>*Metric captures households enrolled in the Housing Authority's FSS Program.</i>				
<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Housing Choice subsidy per household affected by this policy in dollars (decrease).	<b>As of FY 2015:</b> \$634/month	<b>Alt Rent Group:</b> \$608/month  <b>Control Group:</b> \$628/month		
<i>* Per unit subsidy equals average HAP to Owner.</i>				
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase).	This information was not previously tracked.  As of FY 2019 <b>Alt Rent Group:</b> \$275  <b>Control Group:</b> \$267	<b>Alt Rent Group:</b> \$281  <b>Control Group:</b> \$272		
<i>*Total tenant payment.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	<b>As of FY 2016:</b>  <b>Alt Rent Group:</b> 161 (22% of 722 households)  <b>Control Group:</b> 188 (21% of 915 households)	<b>Alt Rent Group:</b> 175 (35% of 500 households)  <b>Control Group:</b> 141 (21% of 583 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: Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing**  
*(Formerly known as Beecher Terrace Choice Neighborhood Initiative (CNI) Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing, Activity #49-2018)*

**Plan Year Approved, Implemented, Amended**

Approved and implemented FY 2018.

**Description/Update**

This activity allows LMHA to acquire unsubsidized units for development of mixed income housing. In some instances, such units will become PBV developments. As these units will not receive ongoing Section 9 operating subsidy, HUD approval of these acquisitions is not required. However, the units will still be targeted to households whose income does not exceed 80% of Area Median Income (AMI).

LMHA is currently using the flexibility under this activity to pursue opportunities to acquire properties where the Housing Authority can provide off-site replacement housing for its current CNI Grant, awarded for the redevelopment of Beecher Terrace, without relying on a 3<sup>rd</sup>-party developer or owner.

In June 2019, LMHA's affiliate, LMHA Development Corporation, undertook the first acquisition under this activity and purchased 6600 Newbridge Place, a family apartment complex. LMHA provided an acquisition loan to LMHADC for the purchase price of Newbridge Place. LMHA anticipates placing 27 units under PBV HAP contract by the end of FY 2022.

LMHA undertook the acquisition of this property as a pilot project to determine whether this unique approach to the provision of mixed-income replacement housing developments to include PHA owned PBV acquisitions is indeed feasible. Now that the agency has "proof of concept," the Housing Authority may 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**

Over the course of the Plan Year, LMHA has conducted a more thorough analysis of LMHA's past acquisitions and development and found that affordable housing acquired and developed using MTW Broader Use of Funds flexibility had inadvertently not been counted in past reports. To date, LMHA has utilized MTW funds to develop 205 tax credit units. As these units do not receive on-going Section 8 or Section 9 subsidy, LMHA will continue to comply with requirements set forth in PIH Notice 2011-45.

**Planned Changes to Metrics/Data Collection**

Benchmarks have been updated to reflect a total of 205 units which were developed using MTW Broader Use of Funds flexibility. Benchmarks have also been updated to reflect plans to place all 27 units at Newbridge Place under HAP by the end of FY 2022.

**Metrics**

<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Housing Choice subsidy per household affected by this policy in dollars (decrease).*	<b>As of FY 2017:</b> \$5,460	\$0		
* Represents PBV households at Newbridge Place only.				
<b>SS #7: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
PHA rental revenue in dollars (increase).*	<b>As of FY 2017:</b> \$7,536 (\$1,884 per household X 4 households)	\$50,868 (\$1,884 per household X 27 households)		
* Represents PBV households at Newbridge Place only.				
<b>HC #1: Additional Units of Housing Made Available</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).*	<b>As of 2017:</b> 0	232		
* Includes PBV, LIHTC and market-rate affordable units acquired by LMHA.				
<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	<b>As of FY 2017:</b> 0	232		
* Includes PBV, LIHTC and market-rate affordable units acquired by LMHA.				
<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	<b>As of FY2017:</b> \$84 (4 households x 0.75 hours per verification x \$28.16 per staff hour)	\$528 (27 households x 0.75 hours per verification x \$28.16 per staff hour)		
* Represents PBV households at Newbridge Place only.				

### Planned Significant Changes

No significant changes are planned.

## **Activity #2018-2: HCV Owner Leasing Incentive** *(Formerly known as Increasing Housing Options for Relocating Beecher Terrace Families, Activity #2018-2)*

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

Approved and implemented FY 2018; amended FY 2021

### **Description/Update**

LMHA originally developed this activity to address the significant need for one-bedroom units in LMHA's jurisdiction, including among families relocating from the Beecher Terrace public housing development (relocation of these families was completed in FY 2020).

However, as Beecher Terrace resident relocation has been completed, this activity has been modified and expanded to address the need to attract new owners and lease quality rental units of all bedroom sizes in the HCV program. These modifications strengthen owner incentives to lease new units to HCV participants, and also to lease units in high opportunity areas.

Specifically, LMHA received approval in FY 2021 to revise and expand this activity, in order to strengthen incentives for owner to make new units available for leasing to HCV program participants. The following changes to this activity were implemented in FY 2021:

- **Modified Owner Incentive Fee:** Incentives are provided to owners who lease a new unit to an HCV family (i.e. unit has never been previously leased to another LMHA HCV participant). LMHA will provide a one-time \$500 payment for leasing a new unit, payable upon execution of a HAP contract. As the low inventory of one-bedroom units in the Louisville Metro area is still a significant challenge, LMHA will also offer an *additional* \$500 payment at the one-year anniversary of the HAP contract to owners who lease new one-bedroom units to HCV participants.
- **Vacancy Loss and Damage Loss Payments:** As another incentive to make new units available to HCV families, LMHA offers limited vacancy loss and damage payments to owners who lease a new unit to an HCV family.

Vacancy loss payments will be made available to owners whose tenants vacate the unit without notice or LMHA authorization, prior to the end of their lease term. To qualify for the vacancy loss payment, the unit owner must re-rent the unit to another HCV family within 6 months of the date that the owner notifies LMHA of move-out. Owners will be paid only for the length of time the unit was vacant, with a maximum payment equivalent to two months of HAP. In addition, LMHA will only reimburse owners to the extent that the lost rent is not covered by the security deposit (after being applied to any damages). Finally, owners must demonstrate a good faith effort to re-rent the unit to another HCV family during the period of vacancy.

*Example:* Tenant A vacated a unit without providing notice. Owner A demonstrated good faith efforts to re-rent the unit to another HCV family, but the unit remained vacant for 3 months. After accounting for damages, Owner A had \$400 remaining in security deposit funds. In this case, LMHA would provide a vacancy loss payment equal to two months' HAP, minus the security deposit held. If the monthly HAP payment was \$600, the vacancy loss payment would be  $\$600 \times 2 - \$400 = \$800$ .

LMHA will also provide damage loss payments to owners who agree to accept a reduced security deposit. The reduced security deposit will help mitigate the financial barriers families face at lease-up, reducing time for landlords to find a qualified HCV tenant. The reduced deposit must be equal to the lesser of one month of the tenant portion of the rent or \$200. At move out, LMHA will award a damage payment for tenant caused damages up to a maximum amount of one month's contract rent, which is typically the normally required security deposit amount, minus any amount covered by the tenant security deposit.

*Example:* Tenant B had a tenant rent share of \$150, and a total contract rent of \$1,000. At lease-up, Owner B agreed to accept the lesser of one month's tenant rent share or \$200 as a security deposit, resulting in a security deposit amount of \$150. At move out, the unit had \$900 of tenant caused damages. In this case, LMHA would provide a damage loss payment equal to the amount of damages (not to exceed the amount of one month's contract rent), minus the amount of the actual tenant security deposit. Therefore, the amount of the damage payment would be  $\$900 - \$150 = \$750$ . LMHA will hold the family accountable for any damage payments made on their behalf.

In addition, the following revisions to the activity were approved in FY 2021 but have not yet been implemented. LMHA plans to implement the following approved changes in FY 2022:

- **Pre-Qualifying Unit Inspections:** As another incentive to lease new units, LMHA will offer pre-qualifying unit inspections for units new to the HCV program. These inspections will not be linked to a specific tenant and are intended to expedite the leasing process by minimizing inspection-related delays. After the inspection is conducted, unit owners will have up to 90 days to lease the unit to an HCV family.
- **Inspection Incentive for Units in Exception Payment Standard Areas:** Exception Payment Standard areas are generally located in high opportunity neighborhoods. The housing stock in these areas is typically newer and/or in better condition than in other areas of LMHA's jurisdiction. However, HCV participants in these areas face competition with market rate tenants, who do not have the same administrative requirements for lease-up and continued occupancy, including inspections. As a final incentive to increase the supply of available HCV units and opportunities for families, LMHA proposes to conduct biennial HQS inspections for all units located in approved Exception Payment Standard areas or units with a construction date of 1990 or later (normally LMHA conducts annual HQS inspections). This new policy is designed to reduce the administrative burden of inspections on landlords, which will increase the overall inventory of HCV units available to LMHA.

LMHA will partner with the Louisville Apartments Association, a landlord industry group, to promote these incentives to its members.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection 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).	<b>As of FY 2017:</b> 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	106		

## 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: Approved and implemented FY 2019; amended FY 2020.

### **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 an 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.
- 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 3<sup>rd</sup>-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 may utilize the LIHTC program's Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at recertification.
- 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 PIH 2018-11 or successor notices, subject to LMHA's review and approval prior to implementation.
- Owner Managed Site Based Waiting Lists. This will 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, as well as PBV units at Gray & Clay and Roosevelt Apartments. Owners will forward applications nearing the top of the waiting list to LMHA, and LMHA will continue to maintain responsibility for eligibility determination.
- For LIHTC units, the Tenant Income Certification form will be used to verify income and assets for eligibility determinations and recertifications. 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 allows 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

LMHADC-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 LMHADC-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.

- Expansion of Prior Competition Exemption. LMHA proposed and received approval to select without prior competition proposals for housing currently ever assisted with Low Income Housing Tax Credits (LIHTCs) or under a federal, State, or local government subsidy program if the project has been selected in accordance with the competitive requirements of the applicable funding source in the last 10 years. The original competitive selection of these projects cannot have involved any consideration that the project would receive PBV assistance.
- Allow 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." This flexibility allows LMHA and duly selected PBV owners/developers to pursue the development and/or acquisition of land and existing buildings. LMHA plans to use MTW site selection flexibility for PBV units that are not being developed as off-site replacement units in conjunction with the Choice Neighborhoods grant.

In FY 2022, LMHA plans to enter into HAP contracts for 121 units at five (5) sites, in addition to the 243 units already under HAP contract

### **Planned Non-Significant Changes**

In FY LMHA will remove the portion of this activity which waives the requirement to inspect contract units at tenant turnover. Accordingly, LMHA will inspect contract units at tenant turnover and in concert with PBV HQS regulatory requirements.

LMHA will also provide damage loss payments to owners who agree to accept a reduced security deposit. The reduced security deposit will help mitigate the financial barriers families face at lease-up, reducing time for landlords to find a qualified HCV tenant. The reduced deposit must be equal to the lesser of one month of the tenant portion of the rent or \$200. At move out, LMHA will award a damage payment for tenant caused damages up to a maximum amount of one month's contract rent, which is typically the normally required security deposit amount, minus any amount covered by the tenant security deposit.

- *Example:* Tenant B had a tenant rent share of \$150, and a total contract rent of \$1,000. At lease-up, Owner B agreed to accept the lesser of one month's tenant rent share or \$200 as a security deposit, resulting in a security deposit amount of \$150. At move out, the unit had \$900 of tenant caused damages. In this case, LMHA would provide a damage loss payment equal to the amount of damages (not to exceed the amount of one month's contract rent), minus the amount of the actual tenant security deposit. Therefore, the amount of the damage payment would be  $\$900 - \$150 = \$750$ . LMHA will hold the family accountable for any damage payments made on their behalf.

## Planned Changes to Metrics/Data Collection

LMHA has updated the agency cost saving and time saving metrics benchmarks to reflect an approach which is feasible to track and calculate as well as to reflect the anticipated PBV outcomes in FY 2022.

## Metrics

<b>CE #1: Agency Cost Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (savings).	\$2,100 cost  2 developments @400 = \$800 preselection verification  27 units @ \$48.14/inspection = \$1,300	\$1,004 Savings  $\$2,100 - \$1,000 = \$1,100$  \$1,000 cost  27 units x \$37.03/inspection = \$1,000		
*Baseline represents cost of activity with independent entity requirement and total PBV contracts through FY 22. The benchmark reflects annual cost savings related to waiver of the independent entity requirement.				
<b>CE #2: Staff Time Savings*</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	0	0		
*LMHA does not anticipate any time savings related to this activity				
<b>CE #4: Increase in Resources Leveraged</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Amount of funds leveraged in dollars (increase).	As of FY 2017: \$0 (no PBV units)	\$23,048,927 (\$190,487 (TDC for a 2-BR walkup) x 121 units)		
*Represents average TDC for a 2 BR unit times the number of new PBV units anticipated in the fiscal year.				
<b>HC #1: Additional Units of Housing Made Available*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI because of the activity (increase).	As of FY 2019: 0 (no PBV units)	364 households		
* Represents the total number of all PBV units committed/leased/issued by the end of the fiscal year.				
<b>HC #3: Decrease in Wait List Time</b>				

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		
<b>HC #4: Displacement Prevention</b>				
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)	364 households		
* Represents the total number of all PBV units committed/leased/issued by the end of the fiscal year				
<b>HC #5: Increase in Resident Mobility*</b>				
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 2019: 0 (no PBV units)	364 households		
* Represents the total number of all PBV units committed/leased/issued by the end of the fiscal year				

### Planned Significant Changes

No significant changes are planned.

## Activity #2020-1: Rent Simplification

### Plan Year Approved, Implemented, Amended

- Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – HCV Program  
(Formerly Activity #40-2014, approved FY 2015 and implemented FY 2016)
- Elimination of the Standard Earned Income Disregard  
(Formerly Activity #32-2012, approved FY 2012; implemented in HCV Program FY 2012; and implemented in Public Housing Program FY 2014)
- Standard Medical Deduction  
(Formerly Activity #8-2008, approved and implemented FY 2008, amended FY 2021)
- Earned Income Disregard for Elderly Families  
(Formerly Activity #6-2008, approved and implemented FY 2008)
- Asset Policy  
(Approved and implemented FY 2020)
- Exclusion of Full-Time Student Income  
(Approved and implemented FY 2020)
- Exclusion of Adoption Assistance Payments  
(Approved and implemented FY 2020)
- Application of Payment Standards  
(Approved FY 2020, implementation planned FY 2022)

### Description/Update

This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) residents.

- Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – HCV/PBV Programs  
When calculating an HCV/PBV 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 Standard Earned Income Disregard  
  
LMHA eliminated the HUD Standard Earned Income Disregard from the calculation of total tenant payment for families who are in the Public Housing and HCV programs.
- Earned Income Disregard for Elderly Families  
  
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.

- Asset Policy

Using its MTW authority, LMHA has adopted the following policies regarding asset self-certification, verification, valuation, and income calculation:

- 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 is 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

Under existing HUD regulations, all but \$480 of earned income is excluded for full time students. Using its MTW flexibility, LMHA has adopted a policy of excluding *all* full-time student earned income. This income exclusion applies to full-time students other than the head of household, co-head, and spouse. Because this income is fully excluded, LMHA will not require verification. However, LMHA will verify qualification for the exclusion.

- Exclusion of Adoption Assistance Payments

Under existing HUD regulations, all but \$480 of adoption assistance payments is excluded from the calculation of income. Using its MTW flexibility, LMHA has adopted a policy of excluding *all* adoption assistance payments. Because this income is fully excluded, LMHA will not require verification. However, LMHA will verify qualification for the exclusion.

- Modified Standard Medical Deduction

In FY 2021, LMHA received approval and implemented a modification to its existing medical deduction threshold for elderly HCV, PBV, and public housing families. These families originally could claim a \$1,600 flat deduction without the need for third party verification. LMHA modified the medical deduction and established a new threshold equivalent to the Medicare Part B premium established by the U.S. Centers for Medicare and Medicaid Services. LMHA uses the premium amount corresponding to the year in which the family's re-examination is scheduled to take place. For Calendar Year 2021, this premium is \$148.50 per month, or \$1,782 per year.

This change enables LMHA to account for rising medical costs using a known U.S. government figure but also avoids the additional expense and administrative burden of future MTW activity modifications when the deduction threshold needs to be increased. This change also benefits families, as it represents a modest overall increase in the overall value of the deduction before third party verification is required.

LMHA plans to implement the following approved change in FY 2022.

- Application of Payment Standards

Using its MTW flexibility, LMHA will apply the payment standard in effect on the effective date of a household's 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.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection 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)	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		
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage – decrease)	Not Tracked	5%		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total household contributions towards housing assistance (increase)	PH: \$562,364  HCV: \$2,181,057	PH: \$573,611  HCV: \$2,224,678		
<i>*Total monthly TTP used for PH and HCV.</i>				
<b>CE #6: Reducing Per Unit Subsidy Costs for Participating Households*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Housing Choice subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	\$592	\$580		
<i>*Average Total HAP</i>				
<b>SS #1: Increase in Household Income*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	PH: \$19,340  HCV: \$17,635	PH: \$19,727  HCV: \$17,988		
<i>*Average earned income for those with earned income.</i>				
<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>

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>				
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease)	PH: 69  HCV: 413	PH: 68  HCV: 405		
<b>SS #5: Households Assisted by Services that Increase Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	N/A	N/A		
<i>*There are no services associated with this activity.</i>				
<b>SS #8: Households Transitioned to Self Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	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>				

**Planned Significant Changes**

No significant changes are planned.

## Activity #2020-2: Streamlined Flat Rent

### Plan Year Approved, Implemented, Amended

Approved and implemented FY 2020.

### Description/Update

This activity applies to Public Housing (PH) residents. Using MTW flexibility, LMHA has revised 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 administrative burden. Often, errors result from incorrect application of updated flat rents.

Instead, 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.

The average change in FMR between 2020 and 2021 was 6% on average, and as such LMHA has updated the flat rent schedule and will continue to complete flat rent updates for families on their anniversary dates.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

Benchmarks have been updated to reflect the volume of flat rent updates that LMHA will complete in FY 2022 as a result of the average FMR increasing more than 5% between CY 2020 and 2021.

### 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: \$4,844	Total Cost: \$2,422		
	Average hourly rate: \$28.16	Average hourly rate: \$28.16		

	Time spent to complete a flat rent update: 1 hour  Number of households on flat rent: 172	Time spent to complete a flat rent update: 1 hour  Flat Rent Updates: 86		
* In FY 2022, LMHA anticipates completing flat rent updates for approximately half of the families on flat rent. LMHA began completing flat rent updates in FY 2021 at the time the CY 2021 FMRs were published and will complete flat rent updates for the remaining families during the first six (6) months of FY 2022.				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	Total 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: 86 hours  Time spent on each flat rent update: 1 hour  Number of households on flat rent: 86		
* In FY 2022, LMHA anticipates completing flat rent updates for approximately half of the families on flat rent. LMHA began completing flat rent updates in FY 2021 at the time the CY 2021 FMRs were published and will complete flat rent updates for the remaining families during the first six (6) months of FY 2022.				
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	Not currently tracked	5%		
<b>CE #5: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.				

### Planned Significant Changes

No significant changes are planned.

## **Activity #2020-3: Local Forms**

### **Plan Year Approved, Implemented**

Approved and implemented FY 2020.

### **Description/Update**

This initiative allows LMHA the flexibility to develop local versions of forms, as needed, to streamline processing, utilize “plain language”, address MTW policies, and address local housing market features. Forms that LMHA plans to develop include, but are not limited to, 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 Approval (RFTA), the Tenant Based HAP Contract, and the Privacy Act Notice. Any HAP Contract changes 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.

To date, LMHA developed and implemented the following local forms:

- LMHA developed a local version of the FSS Contract of Participation to reflect the program enhancements undertaken under Activity #2020-4.
- LMHA has updated the Personal Declaration form, used for families to list household members, income, assets, and deductible expenses. The form now reflects LMHA’s Asset Policy, established under Activity #2020-1, that allows families to self-certify the value of assets under \$50,000. LMHA also increased the acceptable age of asset verification documents from 60 to 120 days.
- LMHA also created a Local Authorization for Release of Information/Privacy Act Notice (which replaces form HUD-9886). The form extends the expiration date to 36 months to accommodate families on biennial and triennial recertification cycles.
- Finally, LMHA created a Local Project Based Voucher Housing Assistance Payment (PBV HAP) contract, taking into account the flexibilities provided under LMHA’s Local PBV Program (Activity # 2019-1). The PBV Tenancy Addendum and Statement of Family Responsibility were also be updated to reflect LMHA MTW policies. As new PBV contracts are executed and families leased, LMHA will use the applicable MTW forms.

LMHA will explore options for additional local form development throughout FY 2022 as time and resources permit. New forms will be rolled out as they are completed.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

The baseline was updated to reflect PBV contract commitments instead of PBV units. Benchmarks have been updated to reflect the number of PBV HAP contracts which LMHA anticipates entering in FY 2022.

## Metrics

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark**</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Total cost prior to implementation: \$620  Contracts executed in FY 2019: 11  Time to prepare contracts prior to implementation: 2 hours  Average hourly wage: \$28.16	Total cost after implementation: \$338  Expected Contracts executed in FY 2022: 6  Time to prepare contracts after implementation: 1 hour  Average hourly wage: \$28.16		
<i>*The baseline reflects the 11 conditional PBV contract commitments which were reflected in the FY 20 report, which is the first report where PBV commitments were reported by LMHA.            **Benchmark reflects the number of new PBV contracts anticipated in FY 2022</i>				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	Total staff time required prior to implementation: 22 hours  Contracts executed in FY 2019: 11  Time to prepare HAP contract prior to implementation: 2 hours	Total staff time required after implementation: 6 hours  Expected contracts executed in FY 2022: 6  Time to prepare contract after implementation: 1 hour		
<i>*The baseline reflects the 11 conditional PBV contract commitments which were reflected in the FY 20 report, which is the first report where PBV commitments were reported by LMHA.            **Benchmark reflects the number of new PBV contracts anticipated in FY 2022</i>				

## Planned Significant Changes

No significant changes are planned.

## **Activity #2020-4: FSS Program Enhancements**

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

Approved and implemented FY 2020; amended FY 2021.

### **Description/Update**

This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) Family Self Sufficiency (FSS) program participants. Using MTW flexibility, LMHA has developed FSS program enhancements which are designed to both improve the participant retention rate as well as to increase participants' long-term economic capacity by providing incentives 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 FSS due to their level of income. LMHA has modified 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, is currently 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.

LMHA has also developed and implemented 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 2022.



In addition to these enhancements, LMHA received approval to further modify this activity in FY 2021. Accordingly, LMHA has implemented the following changes to the local FSS program:

- HUD currently requires that the head of household be the signatory for any FSS Contract of Participation (CoP). As a result, the head of household is responsible for compliance with ongoing program requirements, including agreed-upon employment and education/training goals established as part of the Individual Training and Services Plan (ITSP). LMHA modified this requirement such that the head of household (or co-head) will still execute the CoP, but at that time they may designate any adult household member (age 18 or over) to fulfill the ITSP requirements and allow the family to collect escrow. This change provides families with working age adults greater opportunity to benefit from the program and achieve greater levels of self-sufficiency, particularly if the head of household has other responsibilities such as ongoing childcare. Please note that the family can only *change* their designated responsible household member either with prior LMHA approval, or in certain extenuating circumstances (death, move out, etc.).
- Under current FSS regulations, a CoP is automatically considered complete, and a family must graduate, once 30 percent of their monthly adjusted income equals or exceeds the existing Fair Market Rent (FMR) for the size of the unit for which they qualify based on the PHA's occupancy standards. For families in this situation, LMHA has modified this requirement to allow an additional period of up to six (6) months to complete ITSP goals before the contract terminates. This extended time period reduces the disincentives to increased earnings that could result from this regulation, and allows families – who have often used the FSS program to substantially increase their earnings – to more fully benefit from their hard work and accumulate increased escrow that will enhance their long-term prospects for self-sufficiency and ability to meet long-term goals such as homeownership. Additionally, this change also incentivizes additional families to participate and remain in the program.
- Finally, LMHA now offers an FSS CoP with modified terms for youth participating in the HUD Family Unification Program (FUP) Foster Care Alumni initiative. These youth receive a voucher for a limited three-year period, and LMHA is committed helping them attain self-sufficiency. The modified CoP revises existing requirements in order to reflect the needs of this population as well as the parameters of the FUP program participation limits. The CoP includes the following terms and requirements:
  - A shortened contract term of 3 years;
  - Participants must be suitably employed, as stated in LMHA's FSS Action Plan, for at least 6 consecutive months;
  - Participants must be not receiving TANF assistance for at least 6 months (reduced from the normal 12-month requirement); and
  - Participants must attend at least 3 professional skills workshops in addition to completing financial skills training.

### **Planned Non-Significant Changes**

LMHA plans to implement the following modifications to its local FSS program in FY 2022. Note that no additional MTW waivers are required:

- LMHA will use FSS escrow forfeitures to fund goal-specific incentive payments disbursed to families who achieve the established interim goals. LMHA will continue to comply with the regulatory requirements for monthly reporting of FSS escrow forfeitures on Form HUD-52681-B.

- LMHA will increase the cap on the amount of escrow to \$25,000 per household. This cap may be periodically reviewed and updated at LMHA's discretion. Incentive payments will continue to count toward the escrow cap.

### Planned Changes to Metrics/Data Collection

As LMHA expects the FSS program to continue to grow and add new participants in FY 2022, the benchmark for SS #4 was updated to also include the percentage of FSS households receiving TANF assistance.

### Metrics

<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).	PH: 17,346 HCV: \$19,429	PH: \$17,693 HCV: \$19,818		
<i>*Average earned income is calculated for households with earned income.</i>				
<i>SS #2: Increase in Household Savings*</i>				
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>				
<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
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%  HCV: No. Unemployed: 43 % Unemployed: 33%	PH: No. Unemployed: 28 % Unemployed: 35%  HCV: No. Unemployed: 41 % Unemployed: 32%		

Enrolled in Education	PH: 4 HCV: 14	PH: 5 HCV: 15		
Enrolled in Job Training	PH: 1 HCV: 1	PH: 2 HCV: 2		
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	PH: 0 HCV: 6	PH: No.: 0 households % of households: 0%  HCV: No.: 6 households % of households: 2%		
<b>SS #5: Households Assisted by Services that Increase Self-Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	330	330		
<i>*Includes graduates as well as families who received services and who did not successfully complete the FSS program.</i>				
<b>SS #6: Reducing Per Unit Subsidy Cost for Participating Households</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average amount of Housing Choice and/or Public Housing subsidy (or local non-traditional subsidy) per household affected by this policy in dollars (decrease).	\$574	\$586		
<b>SS #7: Increase in Agency Rental Revenue*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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>				
<b>SS #8: Households Transitioned to Self-Sufficiency*</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self-sufficiency (increase).	PH: 15 HCV: 31	PH: 16 HCV: 33		
<i>*LMHA defines self-sufficiency as graduation from the FSS program.</i>				

## Planned Significant Changes

No significant changes are planned.

## Activity #2020-5: Gap Financing

### Plan Year Approved, Implemented, Amended

Approved FY 2020, Implementation Planned FY 2022.

### Description/Update

The activity involves the use of MTW flexibility to develop and implement a Gap Financing Program (GFP) for developers using PBVs to create or preserve affordable housing. The GFP provides 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. 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 will be required to pay prevailing wages and meet minority/women/disadvantaged business enterprise participation goals (M/W/DBE), where applicable.

Overall, LMHA expects that the GFP will 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.

Implementation planning for this activity will be ongoing during FY 2022, as LMHA plans to use this financing tool to support a pipeline of ongoing redevelopment efforts using PBV assistance in both existing housing and new construction settings. LMHA expects that these efforts will accelerate the development of replacement units for its Russell Neighborhood Choice Neighborhood Initiative (CNI) project.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

### Metrics

<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)	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 type of household, give that type in the box	PBV: 100	PBV: 100		
<b>HC #3: Decrease in Wait List Time</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on the wait list in months (decrease)	6 mos.	6 mos.		
<b>HC #4: Displacement Prevention</b>				
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		
<b>HC #5: Increase in Resident Mobility</b>				
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		

### Planned Significant Changes

No significant changes are planned.

## **Activity #2021-1: Preservation of Low-Income Homeownership Units**

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

Approved FY 2021, Implemented FY 2021.

### **Description/Update**

Utilizing the MTW local, non-traditional activity for homeownership assistance, LMHA proposes to provide limited financial assistance to existing cost-burdened, low-income homeowners who are at risk of foreclosure and/or displacement. These low-income homeowners reside in Louisville neighborhoods undergoing significant revitalization as a result of Opportunity Zone and other major federal, state and/or local investments such as Choice Neighborhoods and HOPE VI.

As a result of recent and planned significant investments and emerging gentrification trends in and around Opportunity Zone neighborhoods, LMHA anticipates that home values will rise substantially in those areas in the coming years. Ensuring that cost-burdened, long-term low-income homeowners are able to maintain their homes through this evolving process and, ultimately, to build household equity resulting from increased real estate market valuations is a priority of LMHA, and is consistent with its goal to ensure the equitable distribution to long-term community residents of benefits that accrue from major public and private investment initiatives.

An example is the Russell neighborhood, for which LMHA has developed a Choice Neighborhoods Transformation Plan and secured \$35 million in HUD CNI grants. Called Vision Russell, the Transformation Plan initiative's boundaries fall within an Opportunity Zone and span from Market Street to Broadway, and from 9th to 32nd Streets. The CNI grant and leveraged funds secured by LMHA will fund replacement of the Beecher Terrace housing complex and critical community improvements in the Russell neighborhood. One of the key goals of Vision Russell is to increase the availability of high-quality, affordable mixed-income housing including both rental and homeownership units.

In addition to the distressed Beecher Terrace site, the Russell neighborhood is home to an estimated 650 low-income homeowners, many of whom are housing cost-burdened and struggling to meet the rising cost of mortgage loans, utilities, repairs, and other homeownership costs. They are at risk of foreclosure and/or displacement. Consistent with the broader mixed-income housing goal, providing financial assistance to these homeowners is a goal of LMHA and its Vision Russell partners. This will help ensure that long-term residents can remain in the neighborhood and take advantage of the numerous community improvements that are underway or planned over the next several years.

Similar dynamics and demographics are found in other proposed focus neighborhoods such as Park DuValle, Liberty Green and Sheppard Square, all of which are within Opportunity Zones where major HOPE VI initiatives have occurred.

Through this local, non-traditional MTW activity, LMHA will provide homeownership assistance to households that meet the following criteria:

- Meet HUD's definition of low-income;
- Currently own a home within a neighborhood undergoing significant revitalization as a result of Opportunity Zone and other major federal, state and/or local investments such as Choice Neighborhoods and HOPE VI. To avoid rewarding speculators, the home must have been purchased prior to the designation of the neighborhood for significant revitalization investments.

For example, in the Russell neighborhood, the home must have been purchased by the household prior to the submission date for the Vision Russell CNI Implementation Grant proposal; and,

- Are cost-burdened, i.e. total homeownership costs exceed 30% of adjusted gross household income.

All units will be inspected by LMHA and must comply with Housing Quality Standards (HQS). Following the initial HQS inspection, LMHA will refer the household, where appropriate and needed, to local government and other available low or no-cost programs to address needed repairs, support energy conservation objectives and other efforts to reduce ongoing homeownership operating costs to the household. While this is an MTW local, non-traditional activity, household eligibility will be based on the same income, wage, and asset thresholds as those included in the Housing Choice Voucher Homeownership program. The HAP subsidy for the households to be served under this will also be calculated consistent with the methodologies used in the Housing Choice Homeownership program including term limits on the subsidy while ensuring that the family remains in their home.

To support this activity and other MTW homeownership initiatives, LMHA has hired an additional staff person dedicated to supporting existing and potential homeownership participants. Through FY 2023, LMHA anticipates serving a total of approximately 100 households.

LMHA will also require participants to meet the Principal Residency and Financial Capacity requirements applicable to local, non-traditional MTW homeownership activities as further described in PIH Notice 2011-45.

### **Planned Non-Significant Changes**

The low-income homeowners served under this activity are significantly cost-burdened. In addition to being at risk of foreclosure due to mortgage arrears, they may require financial assistance to complete home repairs needed to fully comply with HQS. To limit the risk of unsafe conditions and eventual foreclosure, LMHA will structure this activity to include forgivable loans up to \$25,000 to cover the cost of the repairs necessary to bring the home into compliance with HQS. The forgivable loans are in addition to providing traditional homeownership assistance payments once the home passes HQS inspection and the family has entered into a HAP contract with LMHA.

LMHA will conduct intake screening, including inspecting the home to determine the actions needed to bring the home into compliance with HQS. To ensure that homeowners can remain in their residences, payment standards will be set for the bedroom size of the residence. Subsequent to the intake inspection, LMHA will work with homeowners to assist them with identifying resources to complete the repair work and to complete an estimate of repair costs and schedule of repairs. Upon LMHA approval of the repair estimate and schedule, LMHA will enter into a forgivable loan agreement with the homeowner, including default and lien provisions. Funds will be disbursed upon receipt of invoices from contractors/suppliers. The amount of the loan may be anywhere from \$250 up to a maximum of \$25,000 with the requirement that repairs be completed based on the LMHA approved estimate and schedule. The loan term will be based on forgiveness of up to \$2,500 per year. For example, a \$2,500 loan would be forgiven one year after the HAP contract is signed. Loans of \$2,501 to \$5,000 will have \$2,500 forgiven in year one and the remaining balance forgiven in year two. Once the repairs are completed and the home passes HQS, LMHA will enter into a HAP contract with the homeowner and LMHA will commence providing traditional homeownership assistance payments for a term consistent with homeownership program guidelines. If repairs are not completed on a timely basis and/or if the homeowner does not comply with program requirements, LMHA will terminate assistance and enforce the provisions of the loan agreement.

### **Planned Changes to Metrics/Data Collection**



The benchmark for HC #2 has been adjusted to account for obstacles and delays which may arise if the unit does not comply with HQS. Upon implementation in FY 2021, LMHA found that homeowners who applied to the program were significantly cost-burdened and, as a result, had deferred needed maintenance and repairs. LMHA has proposed non-significant changes to this activity to address the challenges of HQS compliance.

## Metrics

<b><i>HC #2: Units of Housing Preserved</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation: 0	Expected housing units preserved after implementation of the activity: 32		
<i>*Represents households served in FY 2022 and not the total served during the lifetime of this activity.</i>				
<b><i>HC #4: Displacement Prevention</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Households losing assistance/moving prior to implementation of the activity: 100	Expected households losing assistance/moving after implementation of the activity: 0		

## Planned Significant Changes

No significant changes are planned.

## Activity #2021-2: Emergency Waivers

### Description/Update

The COVID-19 outbreak threatens the lives of many Americans and the livelihoods of many more. It is an urgent health crisis of unprecedented scale, and one that is disproportionately impacting low-income families. The outbreak of COVID-19 also places additional burdens on housing authorities which are working tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements. While the Coronavirus Aid, Relief and Economic Security (CARES) Act provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements for the Public Housing program and Housing Choice Voucher (HCV) programs, the duration of this pandemic remains unknown and the national backlog of transactions, inspections and delayed reporting requirements grows.

Accordingly, LMHA will use its MTW authority for this emergency waivers activity to address the burdens placed on all stakeholders as well as to mitigate the backlog of transactions at the end of the waiver period. LMHA has established the following emergency waivers in response to emergencies as declared by the applicable unit of government with jurisdiction over LMHA, including the authority to determine when to place and lift the waivers. LMHA may revise, add and/or remove waivers as needed to address the specific conditions associated with a given emergency (economic, health-related, a natural disaster, etc.). In addition to agency-specific waivers implemented through this activity, LMHA retains the right to avail itself of additional waivers, regulatory or statutory relief, or any other emergency-related provisions that may be made available by HUD or other governmental entities.

- 1. Administrative Plan and Admissions and Continued Occupancy Policies:** LMHA will waive the requirement to obtain Board approval prior to adopting new and/or revised policies. LMHA will obtain formal Board approval within three months of the end of the declared emergency.
- 2. Briefing:** LMHA will waive the requirement to conduct an oral briefing for voucher families and, as an alternative, will conduct the briefing by other means such as a webcast, video call, or expanded information packet. LMHA will ensure that the method of communication for the briefing ensures meaningful access for all invited attendees. This waiver applies to the HCV and PBV programs.
- 3. Delayed Reexaminations:** LMHA will waive the requirement to conduct a reexamination of family income and composition at least annually. Currently LMHA completes reexaminations on a biennial basis for Public Housing (PH) households and on a triennial basis for PH households on flat rents. Where reexaminations have been delayed, LMHA will complete the reexamination no later than the anniversary month of the following year. The next reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on July 2020, LMHA would complete the reexam by July 2021. The next scheduled biennial reexam would take place in July 2023. This waiver applies to the PH, HCV and PBV programs.
- 4. Increase in Payment Standard:** LMHA will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, LMHA will apply the increased payment standard at the next interim reexamination (where applicable) after the effective date of the increased payment standard. If LMHA completes a reexam late, LMHA will apply the payment standard in effect on the effective date of the delayed regular reexamination. This waiver applies to the HCV program.

5. **Verification of Income:** During periods of declared emergencies, LMHA will waive the requirements of the verification hierarchy but continue to use EIV.
6. **Delayed Regular HQS Inspections:** LMHA will waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, LMHA will complete the HQS inspection no later than the anniversary month of the following year. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due on July 2020, LMHA would complete the inspection by July 2021. The next scheduled annual HQS inspection would take place in July 2022. LMHA will continue to request a self-certification from the owner that no life-threatening conditions exist in the unit. Additionally, LMHA will continue to conduct complaint inspections. This waiver applies to the HCV and PBV programs.
7. **Interim HQS Inspections:** LMHA will waive the requirement to conduct re-inspections to confirm repair; however, LMHA will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification or LMHA will conduct a remote video conference within 24 hours to confirm repair. LMHA will accept an owner self-certification that non-life-threatening deficiencies have been corrected within 30 days of LMHA notification. This waiver applies to the HCV and PBV programs.
8. **HQS QC Inspections:** LMHA will waive the requirement to conduct HQS quality control inspections and instead will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV and PBV programs.
9. **Homeownership HQS:** LMHA will waive the requirement for the initial HQS inspection for homeownership units; however, an independent inspection performed by an American Society of Home Inspectors (ASHI) certified professional will still be required. This waiver applies to the HCV Homeownership Program.
10. **Delayed PH Annual Self-Inspection:** LMHA will waive the requirement to complete annual self-inspections of PH units. LMHA will continue to respond to and address serious conditions that could jeopardize life or property. When the waiver is lifted, LMHA will resume self-inspections beginning with the units which were inspected on the oldest date. This waiver applies to the PH program.
11. **FSS Contract of Participation:** LMHA will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, LMHA may extend a family's COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, LMHA may extend their COP beyond the two-year extension threshold. This waiver applies to LMHA's MTW FSS program.
12. **Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units:** LMHA is waiving the HQS inspection requirement and establishing an alternative requirement. Instead of conducting the pre-HAP contract HQS inspection, LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question. LMHA will require the owner's certification. However, LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. LMHA will conduct an HQS inspection no later than the 1-year anniversary date of the owner's certification.

When and if LMHA has imposed an additional requirement under the AHAP for newly constructed or rehabilitated projects, LMHA may choose to allow the owner to certify that the LMHA requirement has been met instead of inspecting the housing to make that determination. This waiver and alternative requirement may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection. LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question.

**13. PBV Turnover Unit Inspections:** LMHA is waiving the regulatory requirement to inspect PBV contract units at turnover and providing as an alternative requirement that LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question to allow a new family to occupy the vacated PBV unit. LMHA will require this owner certification. However, the LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. LMHA will conduct the HQS inspection on the unit no later than the 1-year anniversary date of the owner's certification. This waiver may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection.

**14. PBV HAP Contract: HQS Inspections to Add or Substitute Units:** LMHA may amend a HAP contract to add additional PBV contract units or substitute a different unit for a previously covered contract unit. The PBV requirements include inspecting the proposed substitute or additional unit to determine that the unit meets HQS before it may be added to the HAP contract. LMHA is waiving the HQS inspection requirement. In order to substitute or add a new unit to the PBV HAP contract, LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question instead of conducting an initial inspection. LMHA will require the owner's certification. LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. This waiver may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection.

**15. Mandatory Removal of a Unit from the PBV HAP Contract:** Under the PBV program, LMHA is required to remove a unit from a PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family residing in the unit. This situation arises when the family increases its income to such an extent that it no longer requires housing assistance. LMHA is waiving this requirement and as an alternative requirement, LMHA may keep such units under contract for a period of time that exceeds 180 days but does not extend beyond the end of the LMHA emergency waiver period. LMHA may resume housing assistance payments on behalf of a family residing in such a unit should the family's income change at any point during the period of time covered by the emergency waiver and related extension.

### **Planned Non-Significant Changes**

No non-significant changes are planned.

### **Planned Changes to Metrics/Data Collection**

No changes to metrics/data collection are planned.

## Metrics

<b>CE #1: Agency Cost Savings *</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease)	\$181,924	\$90,962		
<i>*The baseline reflects the cost of completion of all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the cost of completion of one half the number of PH and HCV regular reexaminations in a one-year period.</i>				
<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline*</b>	<b>Benchmark*</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	6,399	3,200		
<i>*The baseline reflects the time expended on all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the time expended for one half the number of PH and HCV regular reexaminations in a one-year period.</i>				

## Planned Significant Changes

There are no planned significant changes.

## Activity #2021-3: Eviction Prevention – COVID-19 Relief

### Description/Update

In view of changing circumstances and needs as a result of the COVID-19 pandemic and to prevent homelessness resulting from either evictions or foreclosures, LMHA will work to address the short term housing needs of both low-income renters and homeowners potentially impacted by COVID-19 related economic dislocation. The planned change will not negatively impact any resident. This local non-traditional activity provides services and rental subsidies consistent with PIH Notice 2011-45.

LMHA will allocate up to \$2 million in MTW funds for eligible low-income families who are financially impacted by the COVID-19 pandemic. LMHA will work with the Office of Housing and Community Development (OHCD) at Louisville Metro Government to qualify and administer the COVID-19 rental assistance. Rental assistance will cover rent and arrearages. LMHA will also work with other partner agencies to qualify and administer the COVID-19 mortgage/homeownership expense assistance. Mortgage assistance will cover payments and mortgage arrearages. Homeownership expense assistance may cover expenses such as property taxes, condo fees and insurance. As funding is available and where the COVID-19 pandemic exists for a prolonged period of time, LMHA reserves the right to provide additional funds to this activity.

Where assistance is provided solely for mortgage or rental arrears or homeownership expenses, the HQS inspection requirement will not apply.

Emergency assistance will be provided to low income families for rent/mortgage arrearages and homeownership expenses and will result in a limited number of assistance payments. Accordingly, outside of income eligibility, LMHA will waive all other non-statutory screening elements. Further, as documentation is difficult to obtain as a result of the COVID-19 pandemic and because this vulnerable population will be soon be faced with the end of an eviction moratorium, LMHA will accept self-certification of income on a provisional basis; however, additional verification may be requested if clarifications or further information is needed.

### Planned Non-Significant Change

There are no non-significant changes planned.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

### Metrics

LMHA will utilize data collected from the OHCD to analyze the number of households impacted and estimated costs related to this activity.

<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	250		
<b>HC #5: Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity.	0	N/A*		
*This metric is not applicable to this activity; however, HUD has required its use. This activity provides support for families to remain in their units and prevent eviction.				
<b>HC #7: Households Assisted by Services that Increase Housing Choice</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0	250		

### Planned Significant Changes

There are no significant changes 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 2022 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.



## **D. 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 was placed on hold in 2012. LMHA does not intend to reactivate the Public Housing Sublease Agreement with Catholic Charities activity and will close the activity out in the FY 2021 Report.

#### **Explanation of Non-Significant Changes Since Approval**

No changes have been made since approval.

## E. 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 Housing Choice 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 online 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 –	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

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Mandatory Case Management (Activity #21-2010)			movement toward self-sufficiency. Residents moving into 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 2022. 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 2022 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 2022**

<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$5,895,000
70600	HUD PHA Operating Grants	\$112,731,000
70610	Capital Grants	\$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$215,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$454,000
<b>70000</b>	<b>Total Revenue</b>	<b>\$119,295,000</b>

#### ii. *Estimated Uses of MTW Funds*

**Table 14: Estimated Uses of MTW Funding for FY 2022**

<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$7,200,000
91300+91310+92000	Management Fee Expense	\$3,500,000
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$690,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$6,739,000

<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$14,700,000
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,415,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,059,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$4,500,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$6,900,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$69,092,000
97400	Depreciation Expense	\$3,500,000
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>		<b>\$119,295,000</b>

*ii. 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 \$2,434,570 in surplus funds is budgeted for transfer from the Housing Choice Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall of \$1,445,000 in the Public Housing Program for calendar year 2021 and 2022, 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 the Housing Choice Voucher Program in past years, the proposed budget year's transfer is made entirely from the Housing Choice Voucher 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.

- 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. \$4,250,000).
- To acquire 148 units and retire related debt at Liberty Green Phase I, a tax-credit project that will reach the end of its tax-credit compliance period (approx. \$1,250,000).
- To acquire 68 units and retire related debt at CH-6/Clarksdale, a tax-credit project that will reach the end of its tax-credit compliance period (approx. \$2,130,000).
- To supplement the CHOICE grant for recreational amenities on and near the Beecher Terrace site (approximately \$10,000,000 to make improvements on the former Porter Paints site and the Baxter Community Center).

## F. 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.

## G. Rental Assistance Demonstration (RAD) Participation

i. *Description of the RAD Participation*

### RAD FY 2022

HUD awarded LMHA a Choice Neighborhoods Initiative implementation grant in 2016 for the redevelopment of the former Beecher Terrace public housing site. Twenty-one (21) units have been identified as eligible for RAD under the transfer of assistance provisions. HUD issued a Commitment to Enter into Housing Assistance Payments (CHAP) on October 25, 2019 and entered into a Converted Awaiting Transfer (CAT) Agreement with LMHA for these 21 units effective December 1, 2019.

LMHA anticipates developing 21 new construction RAD units on the Beecher former public housing site as part of Phase IV of Beecher redevelopment, which is planned to include 130 units in total. Phase IV financing is anticipated to use tax-exempt bonds, 4% low-income housing tax credits. In FY 2022, LMHA will work with MBS to apply for a competitive 9% LIHTC award for Phase V of the Beecher redevelopment. LMHA is looking to compete for

9% credits to leverage additional non-LMHA funding. Submission for the 9% credit application in late summer of 2021 and awards are expected in December 2021. Closing for the RAD transaction is anticipated in the early part of FY 2023.

#### RAD Near-Term Strategy

LMHA is reviewing RAD as well as other asset repositioning strategies for Park DuValle. All four mixed-finance phases have exited the initial low-income housing tax credit period and are under LMHA control. In FY 2022, LMHA may proceed with the RAD conversion for Park DuValle and, if so, will submit a Plan amendment prior to proceeding.

LMHA will consider RAD conversions for its Sheppard Square mixed-finance development rental phases, which are owned by LMHA. LMHA will consider converting the Sheppard Square rental phases prior to the expiration of the 15 year LIHTC compliance period. LMHA will review the physical conditions for Sheppard Square. Assuming no significant work is needed, LMHA would anticipate submitting RAD conversion application for the Sheppard Square rental phases. In FY 2022, LMHA may proceed with the RAD conversion for Sheppard Square and, if so, will submit a Plan amendment prior to proceeding.

LMHA will continue to analyze opportunities to use the RAD program to reposition the scattered site portfolio. LMHA will continue to explore transferring subsidies through the RAD “transfer of assistance” provision from vacant, non-viable scattered public housing sites to project-based Section 8 vouchers.

#### RAD Long-Term Strategy

LMHA will consider RAD as one of the key tools available as LMHA looks to preserve its affordable housing portfolio. LMHA will review its scattered site properties for RAD conversion opportunities, including “transfer of assistance.” After the 15-year LIHTC compliance period and after LMHA obtains ownership of each Liberty Green redevelopment phase, LMHA will consider RAD. LMHA will review market dynamics near public housing sites and may consider RAD at additional sites.

**Table 15: RAD Conversions Planned in FY 2022**

Property Name	No. of Units to be Converted	Conversion Type	Description
Beecher Phase IV	21	Converted Awaiting Transfer	Vacant and/or non-dwelling units at former Beecher Terrace public housing site.

**Table 16: RAD Conversions Completed or Projected to be Completed by the End of FY 2022**

Rental Assistance Demonstration (RAD) Participation
LMHA does not anticipate that any RAD conversion(s) will be completed by the end of FY 2022.

- 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.*

LMHA is not submitting any RAD Significant Amendments or any proposed changes from the prior RAD Significant Amendment.
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## VI. Administrative

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### A. Board Resolution and Certifications of Compliance

The required Board Resolution and signed MTW Annual Plan Certifications of Compliance with Regulations are attached in Appendix A.

### B. Documentation of Public Process

The Housing Authority's FY 2022 MTW Annual Plan was made available for public comment from March 11, 2021 through April 10, 2021. Copies of the draft Plan were made available for public review on the Housing Authority's website ([www.lmha1.org](http://www.lmha1.org)) 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, via web conference, on March 24, 2021 at 6 PM. A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 10, 2021 and the *Louisville Defender* on March 11, 2021. Nine individuals participated in the hearing. Copies of public notices, a summary of comments and responses, and sign-in sheets are attached in Appendix B.

The Housing Authority's FY 2022 Amendment to the MTW Annual Plan was made available for public comment from August 22, 2021 through September 20, 2021. Copies of the draft Plan were made available for public review on the Housing Authority's website ([www.lmha1.org](http://www.lmha1.org)), at the Authority's central office (420 S. 8<sup>th</sup> St., Louisville, KY 40203), at the Housing Authority's Housing Choice office (600 South 7<sup>th</sup> Street, Louisville, KY 40203), 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, via web conference, on August 31, 2021 at 6pm. A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on August 22, 2021 and the *Louisville Defender* on August 26, 2021. Four (4) individuals participated in the hearing. Copies of public notices and sign-in sheets are attached in Appendix B. LMHA did not receive any comments on the FY 2022 Amendment to the MTW Annual Plan.

### 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 C and Certification of Payments form (HUD-50071) in Appendix D.

## VII. Appendices

### Appendix A: Board Resolution and Certifications of Compliance

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

CERTIFICATIONS OF COMPLIANCE	
<b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</b>	
<b>Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</b>	
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, 2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:	
(1)	The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
(2)	The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
(3)	The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
(4)	The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
(5)	The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
(6)	The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
(7)	The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
(8)	The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
(9)	In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
(10)	The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
(11)	The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
(12)	The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
(13)	The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

HUD FORM 50900: Standard HUD Metrics

1

- (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 50 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.

Louisville Metro Housing Authority

KY001

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Manfred Reid

Chairman of the Board

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

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

## Board Resolution

**RESOLUTION NO. 32-2021 (4/20/21)**

### **APPROVAL OF FY 2022 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; 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 which extended participation in the MTW Program until June 30, 2018 and subsequently extended participation until June 30, 2028; and Amendment to the Amended and Restated Agreement on March 17, 2020, which authorized citations to waive an independent entity inspection; and

WHEREAS, as a part of the Amended and Restated MTW Agreement, an MTW Annual Plan for Fiscal Year (FY) 2022 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 2022 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, the proposed FY 2022 MTW Annual Plan was made available for public comment between March 11, 2021 and April 10, 2021 and a public hearing was held on March 24, 2021 to discuss the Proposed FY 2022 MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2022 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.

cc: Lisa Osanka      Wavid Wray      Heath Rico-Storey

**RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2022 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 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 drafted for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire on June 30, 2005. LMHA was fortunate to receive a one-year extension 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 extended 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 2022 MTW Annual Plan on April 20, 2021 and the Plan will be submitted to HUD by April 23, 2021.

LMHA hired Edgemere Consulting Corporation (Edgemere) to assist in the development of MTW Plans and Reports and other related MTW activities. The FY 2022 MTW Annual Plan has been prepared and made available for public comment on March 11, 2021 through April 10, 2021. A public hearing to discuss the proposed Plan was held on March 24, 2021.

LMHA proposes three new activities for FY 2022, two of which were proposed as amendments to the FY 2021 Plan. LMHA is awaiting HUD approval of the amendments as of the writing of this plan and therefore includes these activities



**RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2022 MOVING TO WORK ANNUAL PLAN**

**Item No. 5f**

**I. STATEMENT OF FACTS (cont'd):**

in the FY 2022 Plan. LMHA also proposes to revise six existing MTW activities. The FY 2022 MTW Annual Plan requests HUD approval of the following MTW activities:

**New Activity**

Activity 2022-1: MTW Utility Allowance: In FY 2022, LMHA proposes to implement changes to its utility allowance (UA) policies for Public Housing. LMHA will eliminate excess utility charges for Public Housing residents. There are a number of positive outcomes which are anticipated upon implementation of the MTW UA activity such as reducing utility costs for PH residents and reducing LMHA administrative burdens around UA billing and collection.

**Proposed activities in FY 2021 Amendment:**

Activity 2021-2: Emergency Waivers: The Coronavirus Aid, Relief and Economic Security (CARES) Act provided HUD with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements. LMHA proposes to establish waivers in response to emergencies, as declared by the applicable unit of government with jurisdiction over LMHA, including the authority to determine when to place and lift the waivers. These waivers correspond closely with waivers provided through HUD PIH Notice 2020-33.

Activity 2021-3: Eviction Prevention – COVID-19 Relief: As part of the Louisville Metro Office of Housing and Community Development (OHCD) Eviction Diversion Program, LMHA will allocate approximately \$2 million in MTW funds for eligible low-income families who are financially impacted by the COVID-19 pandemic to pay for rent arrearages.

**Revisions to existing activities:**

Activity 2021-1: Preservation of Low-Income Homeownership Units: In FY 2022, LMHA proposes to provide forgivable loans of up to \$25,000 to assist low-income homeowners for the completion of repairs needed to bring their homes into compliance with Housing Quality Standards. Thereafter, LMHA will provide traditional homeownership assistance to assist homeowners in maintaining the affordability of their homes.

Activity 2020-4: Family Self-Sufficiency (FSS) Program Enhancements: LMHA proposes to continue enhancing its FSS program in FY 2022 by adopting the following two new policies:

**RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2022 MOVING TO WORK ANNUAL PLAN**

**Item No. 5f**

**I. STATEMENT OF FACTS (cont'd):**

- Use of FSS escrow forfeitures to fund goal-specific incentive payments disbursed to families who achieve the established interim goals.
- Increase the cap on the amount of escrow to \$25,000 per household.

Activity 2019-1: Enhancements to Local Project-Based Voucher (PBV) Program: LMHA will inspect contract units at tenant turnover and in concert with PBV HQS regulatory requirements. LMHA will also provide damage loss payments to owners who agree to accept a reduced security deposit. The reduced security deposit will help mitigate the financial barriers families face at lease-up, reducing time for landlords to find a qualified HCV tenant. The reduced deposit must be equal to the lesser of one month of the tenant portion of the rent or \$200.

Activity 2015-1: HUD/MDRC Rent Reform Demonstration: This study is scheduled to end in FY 2022, and LMHA will begin transitioning study participants to standard MTW rent policies beginning July 2021 and completing the transition in January 2022.

Activity 2011-1: Housing Choice Voucher Child Care Deductions: When determining income eligibility, families will qualify for the deduction of child-care expenses if the head, co-head and/or spouse is employed at the time of eligibility screening. Families will no longer be required to demonstrate a year of work history.

Activity 2005-1: Special Referral MTW Housing Choice Voucher Programs: LMHA will now partner with Louisville Metro Police Department, Boys' and Girls' Haven, Kentuckiana Builds/Kentuckiana Works, Kentucky Youth Career Center/Kentuckiana Works, St. John Center, Zora's Cradle, Goodwill Industries and Office of Safe and Healthy Neighborhoods providing an allocation of 10 vouchers to each organization. In response to public comments, LMHA is adding the Office of Safe and Healthy Neighborhoods as a partner with an allocation of 10 vouchers.

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

**RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2022 MOVING TO WORK ANNUAL PLAN**

**Item No. 5f**

**II. ALTERNATIVES:**

- A. Approve the submission of the proposed FY 2022 Moving to Work Annual Plan.
- B. Partially approve the submission of the proposed FY 2022 Moving to Work Annual Plan.
- C. Do not approve the submission of the proposed FY 2022 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 2022 MTW Annual Plan. Approval of the FY 2022 MTW Annual Plan by Board Resolution is necessary to permit LMHA to update, maximize, and improve the MTW activities.

Submitted by: Heath Rico-Storey  
Compliance Manager  
April 20, 2021



**BOARD RESOLUTION  
AMENDMENT TO THE FY 2022 MTW PLAN**

**RESOLUTION NO. 66-2021 (9/21/21)**

**APPROVAL OF AMENDMENT TO FY 2022 MOVING TO WORK ANNUAL PLAN  
(APPROVAL OF VERSION 3)**

**Item No. 5a**

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 the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as required by the Amended and Restated MTW Agreement with HUD, the Fiscal Year 2022 MTW Annual Plan (Version 1) was adopted by the LMHA Board of Commissioners on April 20, 2021 and submitted to HUD on April 22, 2021; and

WHEREAS, HUD provided comments on the FY 2022 MTW Annual Plan (Version 1) and LMHA submitted a revised FY 2022 MTW Annual Plan (Version 2) to HUD on July 21, 2021, which was approved by HUD on July 23, 2021; and

WHEREAS, LMHA now finds it necessary to amend the FY 2022 MTW Annual Plan (Version 2) and submit a new FY 2022 MTW Annual Plan (Version 3) in order to propose the disposition of 768 Barret Ave. / (aka 801 Vine St.); and

WHEREAS, a Board Resolution approving the FY 2022 MTW Annual Plan (Version 3) and required Certifications of Compliance must be included in the submission provided to HUD; and

WHEREAS, the FY 2022 MTW Annual Plan (Version 3) was made available for public comment from August 22, 2021 through September 20, 2021, and a public hearing was held on August 31, 2021.

**RESOLUTION NO. 66-2021 (9/21/21)**

**APPROVAL OF AMENDMENT TO FY 2022 MOVING TO WORK ANNUAL PLAN**  
**(APPROVAL OF VERSION 3)**

**Item No. 5a**

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2022 MTW Annual Plan (Version 3) 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.

BE IT FURTHER RESOLVED that Board Chairman, Manfred Reid, is hereby authorized to sign the required Certifications of Compliance.

cc: Lisa Osanka  
Wavid Wray  
Sarah Galloway

## **RESOLUTION BACKGROUND STATEMENT**

### **APPROVAL OF AMENDMENT TO FY 2022 MOVING TO WORK ANNUAL PLAN** **(APPROVAL OF VERSION 3)**

#### **Item No. 5a**

#### **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 extension, 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 extended participation in the MTW Program until June 30, 2018. On April 14, 2016, Congress extended the MTW demonstration to 2028. A second Amended and Restated Agreement was modified and approved on March 17, 2020.

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 adopted the FY 2022 MTW Annual Plan (Version 1) on April 20, 2020 and the Plan was submitted to HUD on April 22, 2020.

HUD subsequently provided comments on the submitted FY 2022 MTW Annual Plan (Version 1). In response to these comments, LMHA made changes to the FY 2022 MTW Annual Plan and resubmitted a revised FY 2022 MTW Annual

## RESOLUTION BACKGROUND STATEMENT

### APPROVAL OF AMENDMENT TO FY 2022 MOVING TO WORK ANNUAL PLAN (APPROVAL OF VERSION 3)

Item No. 5a

#### I. STATEMENT OF FACTS (cont'd):

Plan (Version 2) to HUD on July 21, 2021. These revisions were approved by HUD on July 23, 2021.

A single item has been added to the FY 2022 MTW Annual Plan in Version 3, namely the proposed disposition of 768 Barret Ave. / (aka 801 Vine St.).

The required Certifications of Compliance are provided as Attachment A to this resolution. A red-lined copy of the relevant Annual Plan text is provided as Attachment B.

The full text of the FY 2022 MTW Annual Plan (Version 3) was made available for public comment from August 22, 2021 through September 20, 2021. A public hearing to discuss the proposed Plan was held on August 31, 2021.

#### II. ALTERNATIVES:

- A. Approve the submission of the proposed FY 2022 Moving to Work Annual Plan (Version 3).
- B. Do not approve the submission of the proposed FY 2022 Moving to Work Annual Plan (Version 3).

#### III. RECOMMENDATION:

Staff recommends Alternative "A".

#### IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2022 MTW Annual Plan (Version 3). Approval of the FY 2022 MTW Annual Plan (Version 3) by Board Resolution is necessary to permit LMHA to take advantage of the flexibilities afforded through the MTW Program to increase housing options available to residents. All proposed revisions are subject to HUD approval.

Submitted by: Sarah Galloway  
Special Assistant to the Executive Director  
September 21, 2021

## CERTIFICATION OF COMPLIANCE: PLAN AMENDMENT

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

CERTIFICATIONS OF COMPLIANCE
<p align="center"><b>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b> <b>OFFICE OF PUBLIC AND INDIAN HOUSING</b></p> <p align="center"><b>Certifications of Compliance with Regulations:</b> <b>Board Resolution to Accompany the Annual Moving to Work Plan</b></p> <p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning 07/01/2021, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p> <ol style="list-style-type: none"><li>(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.</li><li>(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.</li><li>(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).</li><li>(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.</li><li>(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.</li><li>(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.</li><li>(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, and the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.</li><li>(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.</li><li>(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.</li><li>(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.</li><li>(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 75.</li></ol>

form HUD 50900: *Certifications of Compliance (3/2021)*

- (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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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.

Louisville Metro Housing Authority

KY001

MTW PHA NAME

MTW PHA NUMBER/HA CODE

*I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.*

**WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. § 3729, 3802).**

Manfred Reid

Chairman of the Board

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

form HUD 50900: Certifications of Compliance (3/2021)



## Appendix B: Documentation of Public Process

### Public Hearing and Comment Period Advertisement:

#### Newspaper

Louisville Defender: 3/11/2021

THE LOUISVILLE DEFENDER, THURSDAY MARCH 11, 2021 PAGE A11

**Louisville Metro Housing Authority (LMHA) - Public Hearing & Public Comment Period for:**  
1) Submission of FY2022 Moving to Work (MTW) Annual Plan; 2) Changes to Public Housing (PH) Admissions & Continued Occupancy Policy; and 3) Changes to Housing Choice Voucher (HCV) Program Administrative Plan. There will be a public hearing to discuss the topics listed above on March 24, 2021 at 6:00 PM. Based on the current State of Emergency in the Commonwealth of Kentucky, LMHA will not supply a physical meeting room. Members of the public are encouraged to participate via Zoom at <https://www.zoom.us>; click on "Join a Meeting"; and enter Meeting ID#: 998 0576 5484. Passcode: 191561. Draft documents will be available for review and public comment from March 11, 2021 to April 10, 2021 on LMHA's website ([www.lmha.org](http://www.lmha.org)) or by mail as requested. Written comments may be mailed to the Housing Authority's main office or emailed to [stacy@lmha.org](mailto:stacy@lmha.org). Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information or for Zoom link, call (502) 569-4471. TDD: (502) 587-0831.

Buyer: Terri Young Phone: (502) 569-3658 Email: [tyoung@lwcky.com](mailto:tyoung@lwcky.com)  
For additional information, bidders must refer to the plans and specifications. Plans and specifications may be obtained from Lynn Imaging, 11460 Bluegrass Pkwy, Louisville, KY 40299, (502) 499-8400 and [www.lwckypianroom.com](http://www.lwckypianroom.com).

**LEGAL ADVERTISEMENT**

Millers Lane Center will sell at Auction the following units: 1305, 1307, 1312, 1316, 1318B, 1404, 1410, 1411, 2111, 2202, 2204, 4083. The sale will be held at facility Rental Office, located at 2501 Millers Lane Suite 901, Lou, KY 40216 on March 29, 2021 @ 9:00 a.m. Terms are Cash/ Cashiers Check.

**Classified Advertising Works!**

**YOU DON'T WANT THEM RESPONDING TO YOUR TEXT.**



# Newspaper

Courier Journal: 3/10/2021

E1 COURIERJOURNAL.COM | WEDNESDAY, MARCH 10, 2021

## **Louisville Metro Housing Authority (LMHA) – Public Hearing & Public Comment Period for: 1) Submission of FY2022 Moving to Work (MTW) Annual Plan; 2) Changes to Public Housing (PH) Admissions & Continued Occupancy Policy; and 3) Changes to Housing Choice Voucher (HCV) Program Administrative Plan.**

There will be a public hearing to discuss the topics listed above on March 24, 2021 at 6:00 PM. Based on the current State of Emergency in the Commonwealth of Kentucky, LMHA will not supply a physical meeting room. Members of the public are encouraged to participate via Zoom at <https://www.zoom.us/j/99805765484>; click on "Join a Meeting"; and enter Meeting ID#: 998 0576 5484 Passcode: 191561. Draft documents will be available for review and public comment from March 11, 2021 to April 10, 2021 on LMHA's website ([www.lmha1.org](http://www.lmha1.org)) or by mail as requested. Written comments may be mailed to the Housing Authority's main office or emailed to [rico-storey@lmha1.org](mailto:rico-storey@lmha1.org). Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information or for Zoom link, call (502)569-4471. TDD: (502)587-0831.

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## AUTOS

### AUTOS FOR SALE

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## Web Advertisement

### Courier Journal Web Advertisement – 3/11/2021

The Courier-Journal (<http://>) | Public Notices  
([http://category.php?  
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Louisville Metro Housing Authority (LMHA)  
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English speaking persons will be made  
available upon advance request. For  
additional information or for Zoom link, call  
(502)569-4471. TDD: (502)587-0831.

Click for less text ([http://item.php?id=4632980&place=Public  
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## FY 2022 MTW Plan Amendment

### Public Hearing and Comment Period Advertisement: Newspapers

#### Louisville Defender Advertisement

THE LOUISVILLE DEFENDER, THURSDAY AUGUST 26, 2021 PAGE A11

# Classified Advertising

NEWSPAPER SECTION! CALL 502-772-2591

LEGAL ADVERTISEMENT	ADVERTISEMENT FOR BID
<p><b>Louisville Metro Housing Authority (LMHA) – Public Hearing &amp; Public Comment Period for an Amendment to FY2022 Moving to Work (MTW) Annual Plan.</b> There will be a public hearing to discuss the above topic on August 31, 2021 at 6:00 PM. Based on the current State of Emergency in the Commonwealth of Kentucky, LMHA will not supply a physical meeting room. Members of the public are encouraged to participate via Zoom at <a href="https://www.zoom.us/">https://www.zoom.us/</a>; click on "Join a Meeting"; and enter Meeting ID# 820 6246 4553 Passcode: 966280. A draft document will be available for review and public comment through September 20, 2021 on LMHA's website (<a href="http://www.lmha1.org">www.lmha1.org</a>); at LMHA's main office (420 S. 8<sup>th</sup> St.); HCV office (600 S. 7<sup>th</sup> St.); at PH Management Offices; or by mail as requested. Written comments may be mailed to the Housing Authority's main office or emailed to <a href="mailto:gallo-way@lmha1.org">gallo-way@lmha1.org</a>. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-3422. TDD: (502)587-0831.</p> <p>Millers Lane Center will sell at Auction the following units: 2280. The sale will be held at the unit and at <a href="http://www.storagetreasures.com">www.storagetreasures.com</a> on September 7, 2021 @ 1:00 p.m. Terms are Cash.</p>	<p><b>METRO BID OPPORTUNITIES</b> <a href="http://www.louisvilleky.gov">www.louisvilleky.gov</a></p> <p><b>VOLUNTEERS NEEDED</b></p> <p><b>The Long-Term Care Ombudsman Program is seeking Volunteers</b></p> <p>Catholic Charities Long-Term Care Ombudsman Program is dedicated to improving the quality of life for the residents who reside in long-term care facilities. We protect the rights of nursing home residents by identifying, investigating, and working to resolve residents' concerns. As a volunteer you can either provide companionship to residents that do not receive visits, or you can become certified to investigate concerns raised by residents and families. For more information you can go to our website at: <a href="https://ccclou.org/long-term-care">https://ccclou.org/long-term-care</a> or contact Natalie Brown-Radtke, Director of the LTCO Program at 502-637-9786.</p>

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# Courier-Journal Advertisement

6D | SUNDAY, AUGUST 22, 2021 | COURIER JOURNAL

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**ANCHORAGE INDEPENDENT SCHOOL DISTRICT**  
The purpose of this notice is to inform the public that the financial report and the vendor summary for FY 20-21 has been posted to the Anchorage Independent School District website for public viewing. For the year, total Revenues were \$8,329,607 and total expenditures were \$8,537,587. If you wish to review this report, go to the following address: <http://www.anchorage-school.org> and click on Board of Education. Also, a factual list of individual salaries is on file and available for review at the board office located at 11400 Ridge Road. Please contact the board office at 502-245-8927 if you are unable to access this report.  
Hannah Barnes, Chairman; Kelley Ransdell, Superintendent; Jonathan Travis, Finance Officer

**Quality Manager**  
Faurecia Interiors Louisville, LLC, Tier-1 supplier of auto interior systems & compon'ts, seeks Quality Manager in Louisville, KY. Duties: manage company response to customer quality-related quest'ns & concerns; analyze product'n quality control to develop & implem't quality control systems; direct test'g activities to ensure products meet internal quality reqs & customer quality specs; define & monitor compliance w/ product quality standards; oversee implementat'n of & compliance w/ IATF 16949 & VDA 6.3 quality standards; oversee implementat'n of Quality Systems Efficiency processes; ensure compliance w/ HSE guidelines & w/ product safety regs; promote proper app of lean mfg methodologies; develop budgets & approve expenditures for supplies, materials & HR; ensure materials, labor & equipm't are used efficiently to meet product'n targets; develop & enforce procedures for efficient op of mfg systems; maintain up-to-date knowledge of quality control field, rel'ng on current lit pertain'g to materials use, technological advances or statistical studies; apply process control tools to ensure compliance w/ customer reqs. Min edu req: bachelor in industrial eng'g, mechanical eng'g or mfg eng'g, or foreign equiv degree.  
Min exp req: 3 yr exp in quality eng'g posit'n w/ Tier-1 supplier of auto interior systems & compon'ts. Special skills req: must have 3 yr work exp in each of follow'g: apply'g FMVSS reqs; ensur'g conformance w/ ISO 9001, IATF 16949, VDA 6.3 quality standards; us'g quality tools (APQP, PPAP, FMEA & Statistical Process Control) to evaluate product integrity; apply'g OEM-specific quality & product integrity reqs. Exp may be acquired concurrently. Resume to Faurecia Interiors Louisville, LLC.  
Attn: International Mobility Department, 2800 High Meadow Circle, Auburn Hills, MI 48326, or apply online at [www.faurecia.com](http://www.faurecia.com)  
(Req. Number 21144). EOE. Employer paid ad.

**DIRECTV** - Watch your favorite live sports, news and entertainment anywhere. More top premium channels than DISH. Restrictions apply. Call IVS - 1-866-292-5435

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### GENERAL FOR SALE

All classified ads are subject to the applicable rate card, copies of which are available from our Advertising Dept. All ads are subject to approval before publication. The Courier-Journal reserves the right to edit, refuse, reject, classify or cancel any ad at any time. Errors must be reported in the first day of publication. The Courier-Journal shall not be liable for any loss or expense that results from an error in or omission of an advertisement. No refunds for early cancellation of orders.

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**FREON WANTED** - We pay \$55 for cylinders and cans of R12/R500/R134/R135/R134a. Convenient. Certified Professionals. Call (513) 201-8100 or visit [RefrigerantRecycling.com](http://RefrigerantRecycling.com)

### PETS

If you're looking for a good home for your pet, you may wish to avoid having your pet sold for commercial purposes by screening potential new owners carefully. Kentucky state law regulates the ownership of certain "exotic wildlife." Contact the Dept. of Fish & Wildlife Resources for ownership requirements.

**REMEMBER** - If someone offers you a deal that sounds too good to be true, it probably is.

### DOMESTIC PETS

3 Golden Retriever Pups, 2F, 1M  
Parents are on site & AKC registered  
\$700. Call: 502-724-8287

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**Labrador Retriever Puppies** -  
2 Charcoal Males, 1 Silver Female.  
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Full blooded. Current on all shots.  
Ready to go to your forever  
home today! (Note: I am not a  
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she was to be spayed) \$500/ea.  
Call/Text 502-376-7629

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Cash only. 502-450-4825

### LEGAL

### PUBLIC NOTICES

**Louisville Metro Housing Authority (LMHA) - Public Hearing & Public Comment Period for an Amendment to FY2022 Moving to Work (MTW) Annual Plan.**  
There will be a public hearing to discuss the above topic on August 31, 2021 at 6:00 PM. Based on the current State of Emergency in the Commonwealth of Kentucky, LMHA will not supply a physical meeting room. Members of the public are encouraged to participate via Zoom at <https://www.zoom.us/j/82062464553>, click on "Join a Meeting", and enter Meeting ID# 820 6246 4553. Passcode: 966280. Draft documents will be available for review and public comment from August 22, 2021 through September 20, 2021 on LMHA's website ([www.lmha.org](http://www.lmha.org)); at LMHA's main office (420 S. 9th St.); HCV office (600 S. 7th St.); at PH Management Offices; or by mail as requested. Written comments may be mailed to the Housing Authority's main office or emailed to [galloway@lmha.org](mailto:galloway@lmha.org). Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502) 569-3422. TDD: (502) 567-0831.

## Resident Flyer

### LOUISVILLE METRO HOUSING AUTHORITY

# Public Hearing

- Why?** To get your input on:
- Submission of FY 2022 Moving to Work (MTW) Annual Plan
  - Changes to the Public Housing Admissions and Continued Occupancy Policy
  - Changes to the Housing Choice Voucher Program Administrative Plan

**When?** Wednesday, March 24, 2021 at 6:00 P.M.

**Where?** Zoom Web Conference ([www.zoom.us](http://www.zoom.us))  
Meeting ID: 998 0576 5484  
Passcode: 191561#

You may also call 1-312-626-6799 and use the passcode above (191561)

Drafts of these documents will be available for review from March 11, 2021 through April 10, 2021 on the agency's website ([www.lmha1.org](http://www.lmha1.org)). You can call (502) 569-4471 to request that a copy to be mailed to you.

Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, please call (502) 569-4471. TDD: (502) 587-0831.



LOUISVILLE METRO HOUSING AUTHORITY

# Public Hearing

**Why?** To get your input on an amendment to the FY 2022 Moving to Work (MTW) Annual Plan

**When?** Tuesday, August 31, 2021 at 6:00 P.M.

**Where?** Zoom Web Conference ([www.zoom.us](http://www.zoom.us))  
Meeting ID: 820 6246 4553  
Passcode: 966280

You may also call 1-312-626-6799 and use the meeting information above.

Drafts of these documents will be available for review from August 22 through September 20, 2021 on the agency's website ([www.lmha1.org](http://www.lmha1.org)); at the Central Office (420 S. 8<sup>th</sup> St.); at the Housing Choice Voucher Office (600 S. 7<sup>th</sup> St.); at public housing Management Offices; or you can call (502) 569-3422 to request that a copy be mailed to you.

Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, please call (502) 569-3422. TDD: (502) 587-0831.



## Public Hearing Sign-In Sheet

1. Heath Rico-Storey	LMHA
2. Tracy Holmes-Bell	LMHA
3. Lisa Osanka	LMHA
4. Dan Farrell	LMHA
5. Tonya Wise	LMHA
6. Deborah Gilbert	LMHA
7. Unidentified public member (80940203)	Unidentified
8. Alexandria McCaskill	Unidentified affiliation
9. Chris McCraney	Avenue Plaza Resident Board Member

## Public Hearing Sign-In Sheet – Plan Amendment

### Public Hearing Sign-In Sheet

August 31, 2021

6:00 PM

Name	Affiliation
1. Lisa Osanka	LMHA
2. Sarah Galloway	LMHA
3. Tonya Wise	LMHA
4. Unidentified member of the public (LG Aristo 3)	Unknown



**Louisville Metro Housing Authority**  
**Fiscal Year 2022 MTW Plan**  
**Comments & Responses**

**From:** Heath Rico-Storey  
**Sent:** Thursday, April 15, 2021 10:53 AM  
**To:** Compost Recycling <[avecomprecycle@gmail.com](mailto:avecomprecycle@gmail.com)>  
**Subject:** RE: Follow-up to Public Hearing

Chris,

Thank you for attending our public hearing as well as coordinating the effort to increase resident attendance. Your concerns with virtual meetings are duly noted. Prior to COVID-19, we conducted our public hearings in person in the Avenue Plaza community room. We chose to utilize phone and web meetings in lieu of in-person meetings to adhere to the request by the Louisville Metro Government Department of Health and Wellness of limiting congregate meetings.

If there is a way for us to safely facilitate access to residents, it is important that we make every effort. The Governor has committed to easing congregate gathering restrictions after 2.5 million Kentuckians have been vaccinated. Once we receive guidance that people can safely gather after that goal has been met, we look forward to working with you on a strategy to ensure a rich and diverse participation.

Thank you once again for your concerns.

Heath Rico-Storey  
Compliance Manager  
Louisville Metro Housing Authority  
420 S 8th St.  
Louisville, KY 40203  
office (502) 569-4471  
mobile (502) 693-0483  
[rico-storey@lmha1.org](mailto:rico-storey@lmha1.org)

**From:** Compost Recycling <[avecomprecycle@gmail.com](mailto:avecomprecycle@gmail.com)>  
**Sent:** Thursday, March 25, 2021 1:57 PM  
**To:** Heath Rico-Storey <[rico-storey@LMHA1.org](mailto:rico-storey@LMHA1.org)>  
**Subject:** Follow-up to Public Hearing

Hey Heath,

I just wanted to touch base with you about the public hearing yesterday. A few residents contacted me about their concerns with the virtual meeting via Zoom. There are a few obstacles I think LMHA needs to be made aware of. 1) Some residents still have government phones. These phones have free minutes allotted to them every month. Each call including incoming and outgoing uses up these minutes. 2) Residents are having difficulty understanding and utilizing Zoom. The age and level of education of our residents needs to be taken into consideration. Only one resident aside from myself even attempted to



participate in yesterday's hearing. I would really like to increase the level resident participation in future virtual meetings.

I would like recommend having weekly "Zoom" classes for 10 to 12 residents in the community room. The community room is large enough for use to adhere to the 6ft social distancing guidelines and the wearing of facial masks would obviously be made mandatory. The classes need to be repetitive, in order for our older residents to become comfortable and familiar with this technology. I think if we invest a little more time and effort into helping our residents, they will eventually embrace this new virtual reality. What are your thoughts?

Also, I want to thank you for your help with the flyer. It was very much appreciated and I look forward to working with you in the future.

Regards,  
Chris

## **Comments & Responses**

### **Amendment to the FY 2022 MTW Plan**

LMHA did not receive any comments on the amendment to the FY 2022 MTW Plan.

## Appendix C: Disclosure of Lobbying Activities (SF-LLL)

Approved by OMB  
0348-0046

### Disclosure of Lobbying Activities

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352  
(See reverse for public burden disclosure)

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

## Appendix D: Certification of Payments (HUD-50071) Form

OMB Approval No. 2577-0157 (Exp. 11/30/2023)

### Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

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 grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

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

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

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

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

Name of Authorized Official

Manfred Reid

Title

Chairman of the Board

Signature



Date (mm/dd/yyyy)

4/21/2021

Previous edition is obsolete

form HUD 50071 (01/14)