

**Louisville Metro Housing Authority**

# **Moving to Work Annual Plan**

**Fiscal Year 2023**

**July 1, 2022 – June 30, 2023**

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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 over 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 2023, i.e. the period from July 1, 2022 through June 30, 2023. 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 2023 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>	
2023-1	Special Referral MTW Public Housing Program

Activity No.	MTW Activity
<b><i>Implemented Activities</i></b>	
<b>2022-1</b>	MTW Utility Allowances
<b>2021-1</b>	Preservation of Low-Income Homeownership Units
<b>2021-2</b>	Emergency Waivers
<b>2021-3</b>	Eviction Prevention – COVID-19 Relief ( <i>to be closed out in FY 2022 MTW Report</i> )
<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 ( <i>to be closed out in FY 2022 MTW Report</i> )
<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 2023 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 2023. LMHA projects that 14,065 households will be served through the Agency’s rental assistance, public housing, and Local, Non-Traditional activities in FY 2023. As LMHA’s funding for FY 2023 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 proposed FY 2023 activities include:

- **Special Referral MTW Public Housing:** LMHA is requesting approval to provide temporary housing in select Public Housing units to families participating in the Family Scholar House program. Participating families will receive supportive services from the Family Scholar House as they work to obtain their college degree or complete an apprenticeship program.

LMHA will also continue to implement previously approved MTW activities, including:

- **MTW Utility Allowance Activity:** LMHA received approval from HUD in FY 2022 to implement changes to its utility allowance (UA) policies for the Public Housing Program. Using this approved MTW flexibility, LMHA has eliminated the excess utility charges for Public Housing residents.



LMHA anticipates that the agency will continue to reduce administrative burden around utility billing and collection and has also reduced utility costs for PH residents as a result of this flexibility.

- ***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. With the expiration of the majority of CARES Act waivers and alternative requirements occurring in FY 2022, LMHA will utilize MTW waivers and alternative requirements established under Activity #2021-2: Emergency Waivers to address the continued impact of the COVID-19 pandemic or other emergencies, address residents' needs without delay, and reduce administrative burdens on staff.
- ***Preservation of Low-Income Homeownership Units:*** In FY 2023, LMHA will partner with the Louisville Metro Government's Home Repair program to assist eligible low-income homeowners in meeting Housing Quality Standards (HQS) by connecting them to contractors qualified through the Louisville Metro Government. In addition to this partnership, LMHA anticipates changes approved in FY 2022 will allow more homeowners to complete repairs needed to comply with HQS and access the homeownership assistance made available through this activity. LMHA will provide forgivable loans of up to \$25,000 to assist homeowners in completing repairs needed to bring their homes into compliance with HQS. Once the unit has met HQS, LMHA will provide 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 and a revised asset policy. LMHA plans to discontinue the exclusion of full-time student income and adoption assistance payments, returning to standard HUD rules which require that all but \$480 of these income sources are excluded. In FY 2023, LMHA will exclude income received from guaranteed income pilot programs upon HUD approval. 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. In FY 2023, LMHA plans to develop a local version of the Request for Tenancy Approval (Form HUD-52517) to streamline processing of owner and unit information.
- ***FSS Program Enhancements:*** LMHA implemented several recently approved enhancements to its Family Self-Sufficiency (FSS) Program, including funding for goal-specific incentive payments and increasing the cap on escrow to \$25,000 per household. In FY 2023, LMHA will provide additional incentive payments upon HUD approval. For families who do not experience a significant increase in earnings during their FSS participation and have less than \$500 saved in escrow at graduation, LMHA will provide a payment to supplement the household's total escrow savings, so that the household will receive at least \$500 at graduation. These enhancements are designed to better assist participants in attaining self-sufficiency goals and streamline processes for administering staff.

- **Gap Financing Program:** LMHA will continue to explore the use of this approved 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, LMHA recently received approval to expand leasing incentives under this activity to include pre-qualifying inspections and inspection incentives for units in Exception Payment Standard areas. LMHA will continue to offer incentives to owners who agree to lease new units in the HCV program, including vacancy loss and damage loss payments. Taken together, LMHA anticipates these incentives will attract new owners to the HCV program and encourage participating owners to lease additional units to HCV participants.
- **Preservation of Affordable Housing – Broader Use of Funds to Support Mixed Income Housing:** This activity allows LMHA to acquire unsubsidized units for development of affordable and mixed income housing. To date, LMHA has utilized MTW funds to develop 205 tax credit units. In FY 2023, LMHA will explore opportunities to acquire and/or recapitalize tax credit or other unsubsidized properties.
- **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. In FY 2023, LMHA anticipates project-basing 119 units at the Eclipse at Russell, 116 units at 1405 W. Broadway Senior Apartments, 93 units at Beecher IV, and 8 units at Opportunity East, in addition to 676 project-based units already under AHAP or HAP contract.
- **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 2023, LMHA anticipates that over 1,000 Housing Choice Vouchers will be available to assist these families in making strides toward self-sufficiency and increasing their housing choices. LMHA will enter into three new partnerships with Hope Buss, allocating 10 vouchers to assist families in crisis in the Louisville Metro area, with Kentucky Refugee Ministries, allocating 10 vouchers to assist eligible refugees and immigrants, and with YouthBuild Louisville (10 vouchers), an organization that assists young people in meeting significant life goals, such as preparing for college and careers, by providing services in education, vocational training, community service, case management, placement, and post-graduation support. Additionally, LMHA will allocate an additional 55 vouchers to Wellspring, an additional 20 vouchers to the Louisville Metro Government Office of Resilience and Community Services, an additional 20 vouchers to Joshua Community Connectors, an additional 10 vouchers to the Office of Safe and Healthy Neighborhoods, an additional 10 vouchers to My Chosen People, an additional 58 vouchers to the St. John Center, and an additional 20 vouchers to Volunteers of America Mid-states.
- **MTW Homeownership Program:** In FY 2023, LMHA will propose modifications to its MTW Homeownership Program to allow a broader range of families to benefit from this assistance. Specifically, LMHA will provide homeownership assistance to families who are otherwise eligible if they include an adult working between 25-29 hours a week and earning at least 175% of the

minimum wage (\$25,375 currently). LMHA will also enter a pilot partnership with the REBOUND program to support eligible families in becoming homeowners and landlords.

- ***Elderly/Disabled Housing:*** In FY 2023, LMHA will continue to use MTW flexibility 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 2023, LMHA will implement triennial recertifications for families in Public Housing whose only source of income is Social Security, SSI, and/or a pension. LMHA will also expand biennial recertifications to the HCV program. 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.
- ***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). 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.

Along with its MTW implementation activities, LMHA will implement other initiatives in FY 2023 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 will continue redevelopment efforts in the Russell neighborhood in FY2023. Construction of Beecher Terrace Phase III, comprising 185 units, is anticipated to be complete prior to the start of FY 2023. In FY 2023, LMHA plans to combine Phase IV (141 units) and Phase V (69 units) into one combined Phase IV comprising 210 units. Closing for the combined Phase IV is anticipated to occur in Fall 2022. Additionally, the stabilization of Quinn Chapel will be ongoing in FY 2023, along with the 18th Street Corridor project, which includes owner occupied rehab, rental rehab, rehab for commercial use, and streetscape improvements.
  - ***Sheppard Square HOPE VI Revitalization:*** LMHA is pursuing development of the outstanding homeownership units. Habitat for Humanity is under contract to develop eight (8) of the homeownership lots and has closed on one lot. Five lots are under construction,

and Habitat for Humanity may develop additional lots in the future. LMHA anticipates that up to three (3) closings may take place in FY 2023.

- *Porter Paints:* LMHA has completed demolition and site grading of this former paint factory located at the corner of Muhammad Ali Blvd. and 13<sup>th</sup> Street. A community planning effort was conducted, and conceptual plans for new recreational amenities and economic development opportunities have been developed for the site. Phase I of the project will include greenspace, a pavilion with restrooms, splashpad, plaza and other recreational features, and Phase II will feature a mixed-used building for commercial and retail businesses. The James Graham Brown Foundation awarded LMHADDC a \$1,000,000 grant in May 2021 to be used towards the Phase I project. Construction document preparation for Phase I of this project is anticipated to begin during early FY2023, and document completion is anticipated in early FY2023. LMHA anticipates issuing a request for proposals for Phase I in FY2023.
- *Rental Assistance Demonstration Participation:* In FY 2023, 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. 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 210 units in total.
- In FY 2023, LMHA plans to begin predevelopment efforts for the redevelopment of the Iroquois Homes site as mixed-income housing, potentially with mixed-use elements. During the fiscal year, LMHA may pursue appropriate funding opportunities as they become available. The site is currently being evaluated for development potential and a Planned Development District is being considered for the nearby Taylor Boulevard corridor.

LMHA considers RAD to be one of the key tools available as it looks to preserve its Mixed-Finance affordable housing portfolio. In the near term, LMHA will perform Physical Conditions Assessments for the public housing portfolio. A contractor has been selected, and unit inspections will begin in early March 2022. Once completed, sites will be evaluated and prioritized, and select sites may be submitted for RAD conversion with a plan amendment submitted prior to proceeding. LMHA will also continue to analyze opportunities to use the RAD program to reposition its scattered site portfolio.

- ***Grants and Funding Opportunities*** – In FY 2023, LMHA will continue to administer existing grants, which include the FSS Coordinator ROSS grants and the Choice Neighborhoods Implementation and Supplemental grants. LMHA was awarded \$1 million in grant funding from the James Graham Brown Foundation, which will be used for recreational amenities at Beecher Terrace. LMHA will review and potentially pursue any current or new grant opportunities that should become available during FY 2023. 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 plans to add two new public housing units to its inventory in FY 2023.

**Table 2: Planned New Public Housing Units in FY 2023**

AMP Name and Number	Bedroom Size						Total Units	Population Type	Section 504 Accessible Units	
	0/1	2	3	4	5	6+			Mobility	Hearing/Vision
HOPE VI Scattered Sites (KY001000034)			1				1	Family	X	X
Sheppard Square HOPE VI Replacements (KY001000061)	1						1	Family		
<b>Total Public Housing Units to be Added in the Plan Year</b>							<b>2</b>			

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

The units listed for Bayberry and Manslick below were included as part of the FY 2022 MTW Plan; however, disposition applications have not yet been submitted and, as such, they are now anticipated to be removed in FY 2023. See Appendix E for a list of affected unit addresses.

**Table 3: Planned Public Housing Units to Be Removed in FY 2023**

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Bayberry KY001000034	10	LMHA plans to remove 10 public housing units, which are part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of these units in FY 2023.
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 2023.
Beecher Terrace KY001000002	21	RAD Conversion

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
HOPE VI Scattered Sites KY001000034	14	LMHA plans to remove 14 public housing units, which are part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of these units in FY 2023.
Sheppard Square HOPE VI Replacements KY001000061	1	LMHA plans to remove 1 public housing unit, which is part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of this unit in FY 2023.
<b>Total Public Housing Units to be Removed in the Plan Year</b>	<b>62</b>	

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

**Table 4: New Housing Choice Vouchers to be Project-Based in FY 2023**

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
1405 West Broadway Senior Apartments	116	No	New Construction – Family Housing
Beecher IV	93	21 units	New Construction – Family Housing
The Eclipse in Russell	119	No	New Construction – Family Housing
Opportunity East	8	No	Existing – Family Housing
<b>Planned New Project Based Units in Plan Year</b>	<b>336</b>		

*iv. Existing Project Based Vouchers*

**Table 5: 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	No	New Construction – Senior Housing
Beecher II	43	Leased	No	New Construction – Family Housing
Beecher III	61	Leased	No	New Construction – Family Housing
Donerail	164	Leased	No	New Construction – Family Housing
Market St. Apts	8	Leased	No	Existing – Family Housing
New Vision III	8	Leased	No	Substantial Rehab – Family Housing
Newbridge Place	27	Leased	No	Existing – Family Housing
Roosevelt Apts	43	Leased	No	Existing – Family and Senior Housing
Zion Manor Senior Housing II	34	Leased	No	New Construction – Senior Housing
Lower Hunter's Trace	84	Issued	No	New Construction – Family Housing

Property Name	# of Project Based Vouchers	Planned Status at End of Plan Year*	RAD?	Description of Project
Crossings at Mill Creek	90	Issued	No	New Construction – Family Housing
<b>Total Planned Existing Project-Based Vouchers</b>	<b>676</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 2023, including disposition, rehabilitation, and modernization activities. Additional activities may be added during the Plan year, subject to Board approval and any applicable HUD approvals. See Appendix E for a list of affected unit addresses.

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

Property Name	Description
Dosker Manor	Approximately 22-32 units at a time in Buildings A, B, and C will be held offline for domestic water supply and sanitation drain line replacement.
Holly Park	Twenty-seven (27) vacant units will be held offline for renovation. LMHA will award a contract and begin work on this renovation project in FY 2022. Former management office will be converted to 1-bedroom public housing unit.
Scattered Sites (AMP 017)	Sixteen (16) vacant units will be held offline for renovation in FY 2023.
Scattered Sites (AMP 034)	One (1) vacant unit will be held offline and undergo renovation completed by LMHA Forced Account Crew in FY 2023.
Avenue Plaza	Approximately 32 units at a time will be held offline for domestic water supply and sanitation drain line replacement and bathroom upgrades.
H. Temple Spears	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.
601 West Breckinridge	Former Louisville Housing Services Office will be converted into a public housing unit. LMHA anticipates awarding a contract to complete the conversion in FY 2022.
643 Finzer St.	LMHA plans to request approval to dispose of this non-dwelling building. This property is not and never has been public housing.

*vi. General Description of All 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 2023 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	Beecher Terrace - 002	CHOICE - Beecher Phase III	\$11,380,700
		CHOICE - Beecher Phase IV	
		CHOICE - Beecher Phase V	
		CHOICE - Beecher Relocation	
		CHOICE - Beecher Legal, Financial, other	
		CHOICE - Beecher CHOICE Additional Funds	
Capital Improvements	Parkway Place - 003	Replace Windows	\$14,493,896
		Heat Risers	
		Roof Replacements Gutters, Soffits, Downspouts, Gables	
		Upgrade Washer Hookups	
		HALO	
		Dwelling Equipment	
		Broadband Installation	
		Tree Trimming	
		Eviction Prevention Program	
		Tuckpointing for 58 buildings	
		Automatic Door Closers (Required by Fire Marshall)	
		Replace 20 Basement Doors	
		Wiggins Alarm System	
		Yardi Software	
		Parkway Park Walking Path	
		Resident Stipends	
Capital Improvements	Sheppard Square - 004	Sheppard Partnership costs	\$ 410,490
Capital Improvements	Dosker Manor - 012	High Rise Security	\$18,023,504
		Fire Panel and Medical Alert Panel upgrades A,B and C Buildings	
		Replace Domestic Water Supply/Sanitation drain lines	
		Electrical Repairs	
		Plumbing Risers	
		Dwelling Equipment	
		HALO	
		Reseal/Grout complete bathrooms A Bldg - leaking	
		Automatic Door Closers (Required by Fire Marshall)	
		Resident Stipends	
		HVAC Replace split systems	
		PTAC all buildings - Bldgs A, B & C F.A.C.	
		Security Camera Monitoring System ADS	



Project Type	Site Name	Project Description	Total Estimated Budget
		Roof repairs	
		Tree Trimming	
		Automatic Doors in elevator vestibules Bldg A	
		Yardi Software	
		Repair A Bldg parking lot behind Elderserve - sinking	
		Eviction Prevention Program	
		Elevators	
		Repair exterior and replace garage doors - svce elevators	
		Relocation	
Capital Improvements	St Catherine Court - 013	St . Catherine Domestic Hot water boilers and storage tank replacement	\$2,620,025
		Hi-Rise Security	
		Booster Pump System replacement	
		Automatic Door Closers (required by Fire Marshal)	
		Concrete Foundation Repairs REAC correction of walls, ext ceilings	
		Resident Stipends	
		Dwelling Equipment - Ranges and Refrigerators	
		Modification and upgrades to Fire Pump per PM Global recommendations	
		Paint (not allowing to Replace Wallpaper)	
		Repairs to Building Structure	
		New Trash Shoot Doors	
		Security Camera Monitoring System ADS	
		New Resident Entrance Doors	
		HALO	
		Balance of Abell Elevator Contract	
		New flooring for Mgmt and Resident Council Offices	
		Eviction Prevention Program	
		Yardi Software	
		Tree Trimming	
Capital Improvements	Avenue Plaza/550 Apt - 014	Replace Fire Doors and Fire Panel Ave Plaza and 550 Apts,St Catherine	\$12,428,941
		Riser Replacement - closed loop	
		Replace Domestic Water Supply/Sanitation Drain Lines	
		Hi-Rise Security	
		Tubs, Sinks, Bathroom Replacement - 550 Apartments	
		Replace Counter Tops - Kitchens - 550 Apartments	
		Remodel bathroom showers - Avenue	
		Replace Chiller - 550 Apts	
		Generator	

Project Type	Site Name	Project Description	Total Estimated Budget
		Automatic Door Closers (required by Fire Marshal)	
		Dwelling Equipment	
		Replace Boiler - 550 Apts	
		Replace Domestic Water/Sanitation Drain Lines - 550 Apt	
		Paint Apartments - 550 Apartments	
		Wash Windows	
		Upgrade electric for stoves - 550 Apartments	
		Resident Stipends	
		Upgrade AC Drip pans to prevent leaks	
		Retile floor, ceiling Hallways floor 2 through 18 Avenue Plaza	
		Playground Equipment - 550 Apartments	
		Freight Elevator Upgrade	
		Replace Avenue Plaza rooftop units over Mod and IT	
		Eviction Prevention Program	
		Replace Mailboxes - Avenue and 550	
		Stairwell Lighting	
		Install Access Panels floor 2 through 18 Avenue Plaza	
		Yardi Software	
		LED light fixtures Hallways floor 2 through 18 Avenue Plaza	
		Tree Trimming	
		Redo floor, ceiling, door, lights in laundry rm - 550 Apt	
		Relocation	
		Avenue/550 Plumbing Risers	
Capital Improvements	Scattered Site - 017	Renovation 1131 S 6th Street - roof, tuckpoint, electrical, framing, plaster	\$5,217,924
		Scatterd Sites - Replace siding and gutters 17 #2	
		Fire rehabilitation - 621 East St. Catherine	
		Bathroom Renovations Noltemeyer (46 units)	
		Scatterd Sites - Noltemeyer - Replace furnace and A/C units 17 #2	
		Bathroom Renovations Whipps Mill (17 units)	
		Drainage - Erosion Fegenbush - Whipps Nolt E. P. 17 #2	
		Siding East Pages	
		Bathroom Renovations East Pages (14 units)	
		Kitchen & Bathroom- New 2754 Montana abatement put back 17#1	
		Dwelling Equipment - project 017	
		HVAC-Replace - 655 Country Club Rd (10 units) 17 #1	

Project Type	Site Name	Project Description	Total Estimated Budget
		Abatement put back 1131 S. 6th St. - painting and windows 17 #1 F.A.C.	
		A/C panel replacement and repairs (\$750/unit X 84) 17 #2	
		Bathroom Renovations Fegenbush (7 units)	
		HVAC-Replace 416 N 25th St. (10 units) 17 #1	
		Bathroom Renovations 2906 Rio Rita (6 units) 17 #1	
		Bathroom Renovations W St Catherine (6 units) 17 #1	
		Windows 621 E. Catherine, 2127 Bank 960-64 S. 6th, 2404 17 #1	
		Dryer vents to code Replace - Nolt/EP/Whipps/Fegenbush 17 #2	
		Bathroom Renovations 624 Rubel (4 units) 17 #1	
		Siding - Fegenbush - Whipps 17 #2	
		Gutter Guards (KY 19-22-24) 17 #1	
		Truck - Replace #1207 (2001 F250) with heavy duty pickup KY17	
		Truck - Replace #1228 (2002 Ram) with F250 pickup KY17	
		Bathroom Renovation - 2 houses Newburg 17 #2	
		Erosion Repairs - Fegenbush - Whipps(hill erosion E. P.) 17 #2	
		Exterior Painting Various Sites #17 #1	
		Window Replacement Various Sites #17 #1	
		Tree Trimming - project 017	
		Basement waterproofing 410 & 420 S. Shelby St. 17 #1	
		Window replacement for all Newburg windows 17 #2	
		Wrap windows - 964 S 6th St. 17 #1	
		Concrete porches Replace Front/Rear - 2 houses Newburg 17 #2	
		Eviction Prevention Program 1-17	
		Yardi Software	
		Dumpster pads and paving Repair/Replace-East Pages 17 #2	
		Resident Stipends 1-17	
		Relocation	
		Doors Exterior	
Capital Improvements	Scattered Site - 034	Broadway Firehouse Apartments	\$4,943,160
		Acquisitions and related costs	
		Bathrooms- New for all former HAJC units	
		Foundation & Footer Repair - 3rd St. 34 #2	
		Kitchen & Bath renovations - Bayberry 34 #2	
		601 West Breckinridge Exterior Brick Repairs	

Project Type	Site Name	Project Description	Total Estimated Budget
		Kitchen & Bath renovation inc dishwasher - Six Mile Lane	
		Dwelling Equipment - project 034	
		Force Account Crew 2720 Rodman	
		Force Account Crew #1 2705 Virginia	
		Force Account Crew #1, 2 & 3 - 610 South 24th	
		HVAC Replace - Six Mile Lane 34 #2	
		Office convert to unit 601 West Breckinridge	
		Fencing - 2401-3 Chestnut, 1612 Arlington, 2508 W Oak, 416 N 25th, 2823 Virginia	
		Fencing - 646 S. 26th, 1912 Magazine, 643&645 S 18th, 531&533 E Oak	
		HVAC replace - move to ground 8018 S Third St (8 units) 34 #2	
		Deck repairs - Norbrook structural repairs to deck 34 #2	
		Fire Damage - 3620 Manslick F.A.C.	
		HVAC replace- move to ground 8018 S Third St (8 units) 34 #2	
		HVAC Replace- move cond to ground - 3931 3rd St. 34 #1	
		Furnace & AC units replace - 3332 Breckenridge 34 #2	
		Paint Exterior - Hope VI Scattered Sites 34 #1	
		Furnace & AC units replace Landside 34 #2	
		Bathroom renovations - Breckinridge/Landside 34 #2	
		Window Rep / bathroom & Kitchen cabinets - Del Maria 34 #2	
		Van - Replacement Vehicle - 2022 Ford Transit 350 HD Vans	
		Van - Replacement Vehicle - 2022 Ford Transit 350 HD Vans	
		Van - Replacement Vehicle - 2022 Ford Transit 350 HD Vans	
		Van - Replacement Vehicle - 2022 Ford Transit 350 HD Vans	
		Van - Replacement Vehicle - 2022 Ford Transit 350 HD Vans	
		Truck - Replacement Vehicle - Ford F-250 4x4 ext Cab Pickup	
		Van - Replacement Vehicle - 2021 Ford Transit 350 # 1453	
		Van - Replacement Vehicle - 2021 Ford Transit 350 # 1032	
		Van - Replacement Vehicle - 2021 Ford Transit 350 # 1207	
		Van - Replacement Vehicle - 2021 Ford Transit 350 # 1437	

Project Type	Site Name	Project Description	Total Estimated Budget
		Van - Replacement Vehicle - 2021 Ford Transit 350 # 1438 Van - Replacement Vehicle - 2021 Ford Transit 350 # 2625 Van- Replacement Vehicle - 2021 Ford Transit 350 # 1224 Fencing - 515 E Breckinridge and case by case CH6 # 47 Lighting in common areas Replace - St Martins 34 #1 LED DDC Heating/Cooling Liberty Green Resource Center Truck - Replacement Vehicle - Ford F-250 Pickup Truck - Replacement Vehicle - Ford F-250 Pickup Dryer vents replace to code - Town Park 34 #2 Truck-Replace #1222 (2002 F250) with same Truck-Replace #1254 (04 F250) with heavy duty pick up Gutter Guards (KY 34-35-38-45) 34 #1 Fence - Add/Replace Norbrook 34 #2 Fence- repair & replace behind building Del Maria 34 #2 Fence-privacy and storage replace - Six Mile Lane 34 #2 Eviction Prevention Program 1-34 Liberty Green CC-CC Alarm & Doors Access Control Systems Yardi Software Tree Trimming - project 034 Doors replace - Front & Back Del Maria each unit 34 #2 Fencing - 1820 Neville Drive # .34 Garage tear down - 702 E. Burnett in rear 34 #1 Hallway Flooring common Breckenridge and Landside 34 #2 Handrail Trim & Steps exterior Broadway 34 #2 Hallways Flooring common Town Park Way 34 #2 Decks-paint & secure all- Lafontenay 34 #2 Relocation Property Appraisals Resident Stipends 1-34	
Capital Improvements	Lourdes Hall/Will E Seay Plaza - 018	Domestic Hot Water boilers and tanks Extend Maintenance Shop at Lourdes to South Curb Dwelling Equipment	\$ 1,385,703

Project Type	Site Name	Project Description	Total Estimated Budget
		Lintel Replacement	
		Elevator	
		Resident Stipends	
		Eviction Prevention Program	
		Compactor	
		Automatic Door Closers (required by Fire Marshal)	
		Flooring Hallways and Lobby	
		Pave, Seal and Stripe Parking Lot	
		Tree Trimming	
		Kitchens	
Capital Improvements	Will E Seay Plaza	Security	\$1,711,226
		Upgrade Elevator System	
		Kitchen Cabinets - 54 units	
		Window replacement	
		Replace Medical Alert System	
		Replace 6th Floor main water line	
		Dwelling Equipment	
		Automatic Door Closers (required by Fire Marshal)	
		Yardi Software	
Capital Improvements	Scattered Sites - Amp #61	Unit Conversion - Temple Spears	\$4,970,202
		Evaluate and repair 1st floors all apts - change crawl areas - Holly Park	
		Drainage Improvements - Holly Park	
		Temple Spears Roof	
		Temple Spears Window	
		Decks- all replace Holly Park	
		Finaces & A/C units replace - Holly Park	
		Doors-All Exterior Front/Back replace Holly Park	
		Windows new - Holly Park	
		Capital Contribution	
		Eviction Prevention Program	
		Yardi Software	
		Dwelling Equipment	
		Tree Trimming	
		Resident Stipends	
Capital Services	Sheppard PCC	Additional Operating Subsidy	\$64,500
Capital Services	Mixed Finance Capital Contributions	Phase III - Park DuValle- 031	\$40,000
		Phase IV - Park DuValle - 032	
Capital Services	Contracts	Annual A/E Contract	\$5,721,071
		Agency Wide Computer Software Replacement/ Annual Contract	
		Annual Asbestos and Lead Removal Contract	
		Environmental Consultant - Remediation Monitoring	

Project Type	Site Name	Project Description	Total Estimated Budget
		Annual Microsoft Software	
		Energy Audit	
		Total Annual Contracts	
Capital Services	Administrative Costs	Construction Administration 10% transfer	\$10,088,963
		General Fund for Operations	
		<b>Total</b>	<b>\$ 93,500,305</b>

## B. Leasing Information

### i. Planned Number of Households Served

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

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	41,340	3,445
MTW Housing Choice Voucher (HCV) Units Utilized	125,880	10,490
Local, Non-Traditional: Property-Based	1,308	109
Local, Non-Traditional: Homeownership	252	21
<b>Planned Total Households Served</b>	<b>168,780</b>	<b>14,065</b>

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

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Property-Based	Activity #2014-1: Public Housing – Sublease Agreement	60	5
Property-Based	Activity #2018-1: Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing	1,248	104
Homeownership	Activity #2021-1: Preservation of Low-Income Homeownership Units	252	21

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

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	To eliminate delays in re-leasing units, LMHA will continue to deploy specialized crews to address work required to prepare a unit for new tenants. Vacancy preparation crews specialize in the work commonly required to turnover a unit and have the capacity to turn units on pace with the volume of tenant move-outs in a given month. These crews serve all Public Housing properties managed by LMHA, and are not limited to a particular property. Additionally, LMHA will continue to work with the Family Health Centers of Louisville's Continuum of Care Common Assessment Team to house homeless families,

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
	who receive a preference on LMHA’s waiting list. The Common Assessment Team will continue to complete initial screening elements prior to referring homeless families to LMHA.
MTW Housing Choice Voucher	<p>LMHA will continue to provide owner incentives under Activity 2018-2 for leasing new units to HCV participants. Incentives also include payments to mitigate vacancy and damage loss.</p> <p>LMHA also provides a preference to homeless families on the waiting list for the HCV program, which allows LMHA to streamline the admissions process for these families. To better understand obstacles to leasing that voucher-holders may face, LMHA will continue to utilize the voucher tracking tool to survey “shopping” voucher-holders. LMHA will evaluate the results of this survey to tailor strategies and support to improve leasing, such as owner incentives.</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 to ensure that the public is aware of the availability of LMHA housing. LMHA treats all applicants in a non-discriminatory manner. 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 2023**

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	4,028	Open	N/A
Federal MTW Project-Based Voucher Program	PBV Waiting List	298	Partially open*	N/A
Beecher Terrace Project-Based Voucher	Site-based	1,690	Open	N/A
Federal MTW Public Housing Units	Site-Based	3,988	Open	N/A
Federal MTW Public Housing Units	Community-Wide	3,224	Open	N/A
Project Based Local Non-Traditional MTW Housing Assistance	Program Specific	10	Open	N/A

\* LMHA maintains a central waiting list of former Beecher Terrace households, who receive a preference for on- and off-site replacement PBV units developed as a result of the CNI Implementation grant.

### **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 2023*

Waiting List Name	Description of Planned Changes to Waiting List
Federal MTW Project-Based Voucher Program	LMHA has approved several owner-managed site-based waiting lists for PBV sites developed as replacement housing as a result of the Beecher Terrace CNI, including Beecher Terrace, Opportunity East, Donerail, Zion Manor Senior Housing II, Lower Hunter's Trace, Crossings at Mill Creek, and 1405 W. Broadway Senior Apts.

Waiting List Name	Description of Planned Changes to Waiting List
	LMHA anticipates that owners may establish waiting lists for these sites in FY 2023, once the centrally managed LMHA waiting list of relocated Beecher Terrace households has been exhausted.
Federal MTW Housing Choice Voucher Program	<p>In FY 2023, LMHA will modify its Admin Plan to establish a limited admissions preference for the HCV homeownership program for eligible families participating in the REBOUND homeownership initiative, a program which supports low-income families in purchasing duplex homes and becoming landlords. Though families participating in the REBOUND initiative purchase duplex homes, HCV homeownership assistance will be limited to the unit occupied by the homeowner.</p> <p>To support leasing of the second (rental) unit in the duplex, LMHA will also modify its Admin Plan to provide an admissions preference for HCV tenant-based assistance for eligible families who choose to lease the unit owned by a homeowner participating in the REBOUND program and assisted through the HCV homeownership program. LMHA is initially piloting this partnership with REBOUND, and may expand the pilot in future fiscal years based on its success and partner with other non-profits with a similar program model.</p> <p>Upon conversion to new software, LMHA will begin accepting electronic applications to its HCV Program during FY 2023. Applicants will be able to apply to both the HCV and Public Housing programs using a single application once both programs have transitioned to the new software.</p>
Federal MTW Public Housing Units	Upon conversion to new software, LMHA will begin accepting electronic applications to its Public Housing Program in late FY 2022. Applicants will be able to apply to both the HCV and Public Housing programs using a single application once both programs have transitioned to the new software.

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

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#### **Activity #2023-1: Special Referral MTW Public Housing Program**

Using MTW flexibility, LMHA will develop a Public Housing special referral program to encourage families to pursue their educational goals and increase their earnings over the long-term. LMHA will provide housing to families eligible for the Public Housing program, while the partnering organization will provide supportive services. Taken together, the special referral program will provide the needed stability and support for families on their path to self-sufficiency.

Families will be referred by partner organizations, and applicants will receive an admissions preference for the Public Housing program. Families are screened and determined eligible according to requirements outlined in LMHA's ACOP. LMHA (or the property manager) will verify income and calculate rent for participating families according to standard HUD policies.

Accordingly, LMHA will partner with the Family Scholar House to provide Public Housing to parents while they work to obtain a college degree. To be eligible for this special referral program, 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 or an apprenticeship program as a full-time student. Family Scholar House Public Housing units provide temporary housing to families actively participating in the Scholar House's programming. To receive housing assistance, the head of household must maintain full-time enrollment at a local college, university, or apprenticeship program. Additionally, the head of household must regularly comply with Scholar House program requirements.

Eligibility for the Family Scholar House program is limited to families with children that include either one adult family member or an adult couple. Families interested in applying for a Family Scholar House unit contact the Family Scholar House directly ([www.family scholarhouse.org](http://www.family scholarhouse.org)). Both applicants and current Public Housing residents may apply to this partnership housing and services program; please note however that Public Housing residents will have access to the supportive services portion of Family Scholar House's program if they reside in Public Housing units outside of this partnership program. Applicants will be selected from a site-based waiting list by the date and time of their application. In addition to LMHA's eligibility criteria, participating families will also be subject to Family Scholar House policies, outlined in the Participation Agreement. Failure to comply with policies set forth in the Participation Agreement will result in termination from the program.

Housing assistance will be provided during the term of family's participation in Scholar House. 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 successful program completion. LMHA will place graduating families on the waiting list based on their preference and the date and time of application, according to the waiting list and selection policies described in the Admin Plan.

#### **Statutory Objective**

This activity will provide incentives for Public Housing families with children to obtain employment and become economically self-sufficient. Participating families receive housing from LMHA and support from the Family Scholar House program to increase their stability while obtaining their college degree.

## Implementation

LMHA will implement this Special Referral program upon approval of the MTW Plan.

## 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.

<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Enrolled in an Educational Program	0	11 households		
<i>SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# of HHs receiving services aimed to increase self-sufficiency (increase).	0	11 households		
<i>* All households assisted through this activity will receive supportive services from the Family Scholar House.</i>				
<i>SS #8: Households Transitioned to Self-Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0	3 households		
<i>*Self-Sufficiency is defined as households who obtain their college degree and graduate from the Scholar House program.</i>				
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	11		

## Cost Implications

LMHA does not anticipate that this activity will result in any cost implications.

## Need/Justification for MTW Flexibility

LMHA is seeking flexibility under Attachment C, Paragraph C(2) to establish local preferences and admissions policies for the Special Referral MTW Public Housing program. Additionally, LMHA is seeking flexibility under Attachment C, Paragraph C(11) in order to establish term limits for public housing assistance for families participating in the Special Referral MTW Public Housing program. With respect to establishing local preferences and admission policies, this activity requires waiver of certain provisions of Section 3 of the 1937 Act and 24 CFR 960.206. With respect to implementing term limits, this activity requires a waiver of Sections 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, and 960.255 and 966 Subpart A.

## Additional Information for Term Limit Activities

## Hardship Case Criteria

LMHA and its Special Referral program partners will establish a hardship policy to allow families to request a short-term extension of their term of housing assistance in extenuating circumstances, such as a medical emergency. Participating families must submit a request in writing to Scholar House. As noted in the description above, participating families will be eligible for an admissions preference in LMHA's HCV program upon graduation/program completion.

### **Description of Annual Reevaluation**

LMHA will track and evaluate the participating families' transition from the Scholar House program upon graduation and/or program completion to determine if the preference for the HCV program continues to sufficiently address their housing needs at the term limit. LMHA may alter or extend the program's term limit to address housing needs which may arise at this time.

### **Transition Period**

Not applicable. Families admitted to the Scholar House program are not current Public Housing residents.

### **Rent Reform Activities**

This is not a rent reform activity.

## 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 2023 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 2023, LMHA will allocate an additional 20 vouchers to the Louisville Metro Government Office of Resilience and Community Services, an additional 10 vouchers to the Office of Safe and Healthy Neighborhoods, an additional 10 vouchers to My Chosen People, an additional 20 vouchers to Joshua Community Connectors, an additional 55 vouchers to Wellspring, an additional 58 vouchers to the St. John Center, and an additional 20 vouchers to Volunteers of America Mid-states.

LMHA will also provide vouchers to three (3) new partner organizations. LMHA will allocate 10 vouchers to Hope Buss, a local non-profit social services organization. Hope Buss provides emergency assistance to Louisville families in crisis by connecting them with support for basic needs, such as food distributions and health screenings. LMHA will allocate 10 vouchers to Kentucky Refugee Ministries, an organization which assists eligible refugees and immigrants in resettling and provides comprehensive case management. LMHA will also allocate 10 vouchers to YouthBuild Louisville, an organization that assists young people in meeting significant life goals, such as preparing for college and careers, by providing services in education, vocational training, community service, case management, placement, and post-graduation support. 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 will remove the following metrics:

- CE #1: Agency Cost Savings and CE #2: Staff Time Savings – The implementation of this activity does not eliminate or reduce the number of required tasks LMHA staff must complete when

admitting and managing the continued occupancy of participants assisted through Special Referral vouchers. LMHA does not anticipate that this activity will result in cost or time savings.

- SS #1: Increase in Household (HH) Income and SS #3: Increase in Positive Outcomes in Employment Status – Many families and individuals assisted through the Special Referral program are recently homeless or at-risk of homelessness and require assistance to achieve more immediate goals such as housing stability, safety, or recovery from substance abuse. As a result, LMHA does not anticipate that participation in the Special Referral program will directly impact employment or earned income.
- SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF) – LMHA does not anticipate that participation in the Special Referral program will directly impact household earnings or need for TANF assistance.
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households and SS#7: Increase in Agency Rental Revenue – As noted above, many families assisted through Special Referral vouchers are engaged in supportive services and programming to meet their immediate needs, which may preclude them from working during their participation in the program. As a result, LMHA does not anticipate that participants will be able to reduce their housing subsidy and increase their tenant rent portion as a result of increased earnings.

LMHA will update SS #5: Households Assisted by Services that Increase Self-Sufficiency and increase the benchmark for households receiving services to reflect anticipated leasing in the Special Referral program. SS #8: Households Transitioned to Self-Sufficiency will be updated to reflect the number of families who end their participation in the Special Referral program (excluding terminations).

## Metrics

<i><b>CE #4: Increase in Resources Leveraged</b></i>				
<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)	\$0	\$0		
<i><b>SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency</b></i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
# of HHs receiving services aimed to increase self-sufficiency (increase).*	<b>As of FY 2016:</b> 13 (5% of 279 HHs)	1,072 (100% of 1,072 HHs)		
* All families participating in the Special Referral program receive supportive services intended to assist the family in becoming self-sufficient.				
<i><b>SS #8: Households Transitioned to Self-Sufficiency*</b></i>				
<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)	118 (11% of 1,072 HHs)		
*Self-Sufficiency is defined as the end of participation in the Special Referral program, excluding termination.				
<i><b>HC #3: Decrease in Wait List Time</b></i>				
<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		
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### **Planned Significant Changes**

No significant changes are planned.

**Table 11: LMHA Special Referral MTW Voucher Programs FY 2023**

Organization	Site	FY Proposed	FY Implemented	No. 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	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.
			2021	10				
Centerstone	Scattered Site Locations	2015	2015	50	Vouchers are allocated to Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices and access to services for 50 families referred through Centerstone's Assertive Community Treatment (ACT) team. Assertive Community Treatment is an Evidenced Based Practice approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) and designed to	Full portability upon program completion	No	No: Traditional inspection protocol.
			2021	10				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					engage persons with a Severe Mental Illness (SMI) whose needs are not met by traditional outpatient services. Services are delivered in the context and environment where they are needed (i.e. the team goes to the person). The priority population is adults with a severe mental illness who are currently 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	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.
			2016	1				
			2019	1				
ChooseWell Communities	Scattered Site Locations	2016	2016	10	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.
			2017	60				
			2021	10				
Coalition for the Homeless	Scattered Site Locations	2012	2012	10	Vouchers are allocated to Coalition for the Homeless for homeless families with children.	Full portability upon program completion	No	No: Traditional inspection protocol.
			2013	10				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	(Rapid Re-housing)							
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				
	Stoddard Johnston	2012	2012	57				
	Parkland	2013	2013	53				
	Riverport	2017	2017	64				
	Scattered Site Locations	2021	2021	10				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
House of Ruth	Glade House	2018	2018	10	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: <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> 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.	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	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: <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.
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.	Full portability upon program completion	Yes	No: Traditional inspection protocol.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					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.			
	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	Vouchers are allocated to Wellspring for families with members with severe mental illness. 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	
			2021	10				
			2023	55				
Louisville Metro Government Office of Resilience and Community Services	Scattered Site Locations	2019	2019	10	LMHA will allocate vouchers to individuals and families experiencing homelessness. 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.
2021	20							
2023	20							
Home of the Innocents	Home of the Innocents	2019	2019	10	LMHA will allocate vouchers to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (the Home) 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	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
			2021	10				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					residential, treatment and community-based programs.			
Volunteers of America Mid-States	Scattered Site Locations	2020	2020	50	LMHA will allocate vouchers to women 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.
	Germantown location (to be developed)		2023	20	VOA Mid-states will provide supportive housing for those experiencing homelessness and low-income families in the Louisville area. VOA will provide intensive, voluntary services in line with the Moving Up strategy.			
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
			2023	20				
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	Full portability upon program completion	No	No: Traditional inspection protocol
			2023	10				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					pregnant women and individuals released from incarceration.			
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:
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
			2023	10				



Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
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 program completion	No	No: Traditional inspection protocol
	Supportive Housing location (to be developed)		2023	58				
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
Hope Buss	N/A	2023	2023	10	LMHA will allocate vouchers to Hope Buss, a local non-profit who provides emergency assistance to families in crisis.	Full portability upon program completion	No	No: Traditional inspection protocol
Kentucky Refugee Ministries	N/A	2023	2023	10	LMHA will allocate vouchers to Kentucky Refugee Ministries, an organization which supports the resettlement of eligible refugees and immigrants and provides comprehensive case management including employment and language services, and cultural orientation.	Full portability upon program completion	No	No: Traditional inspection protocol
YouthBuild Louisville	N/A	2023	2023	10	LMHA will allocate vouchers to YouthBuild Louisville, an organization that assists young people in meeting significant life goals, such as preparing for college and careers, by providing services in education, vocational training, community service, case management, placement, and post-graduation support.	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.

In FY 2023, LMHA anticipates assisting 15 families in becoming homeowners.

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

In FY 2023, LMHA plans to modify eligibility requirements related to income and employment for the MTW Homeownership program. Upon HUD approval, LMHA may provide homeownership assistance to

families if they include an adult member working between at 25-29 hours a week and earning at least 175% of the minimum wage. Families must meet all other eligibility requirements of the MTW Homeownership program to qualify for assistance. LMHA may further adjust this minimum requirement in future fiscal years. Please note that families that include an adult member working 30 or more hours a week will continue to be subject to the existing regulatory minimum for earnings, which is currently \$14,500 annually.

Additionally, LMHA will begin a pilot program to assist eligible families in becoming homeowners and landlords. In FY 2023, LMHA may provide HCV homeownership assistance to families who purchase a duplex through the REBOUND homeownership initiative. LMHA will establish a limited admissions preference for the HCV homeownership program for families participating in the REBOUND program if they are not currently participating in LMHA's HCV homeownership program. HCV homeownership assistance provided by LMHA will be limited to the unit which the eligible family resides in (homeownership unit). LMHA will calculate homeownership assistance for the homeownership unit consistent with MTW homeownership policies. In order to support the homeowner in affording their total mortgage costs for the duplex, LMHA will provide an HCV admissions preference to eligible low-income families to lease the second unit (rental unit) during the period which the homeowner will receive monthly HCV homeownership assistance for the homeownership unit.

As a landlord participating in the HCV program, LMHA will provide the homeowner with leasing incentives made available under Activity #2018-02: HCV Owner Leasing Incentives, including owner incentive fees, in order to mitigate potential financial barriers of leasing the rental unit. To expedite leasing, LMHA will also provide a limited admissions preference to eligible low-income families who lease the rental unit. The family will be subject to the screening and eligibility requirements set forth in the Admin Plan. The pilot program will serve approximately 3-4 homeownership households in FY 2023; LMHA will continue to assist other eligible families through the MTW HCV Homeownership program during the fiscal year in addition to the duplex pilot. LMHA will track homeowners' stability and success in participating in the pilot duplex program and evaluate the program annually. LMHA may expand this pilot initiative in future fiscal years to include additional non-profit partners.

## Planned Changes to Metrics/Data Collection

LMHA will remove the following metrics:

- CE #1: Agency Cost Savings – Though the flexibilities provided under this activity result in time savings, LMHA does not anticipate cost savings as staff time will be re-allocated to other core functions of the MTW Homeownership program.
- CE #3: Decrease in Error Rate of Task Execution – LMHA no longer requires income to be re-verified if the family takes more than 60 days to close on a sale; as a result, LMHA does not anticipate that this flexibility will impact the error rate as the task has been eliminated.

## Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<b>As of FY 2008:</b> 6 hours (12 verifications x 0.5 hours)	0 hours		
<i>HC #5: Increase in Resident Mobility</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	15		
<i>HC #6: Increase in Homeownership Opportunities</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home because of the activity (increase).	0	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 were completed for HCV households where the head, co-head or spouse was elderly or over age 55 and disabled and the only source of income for the household was Social Security (SS) or Disability (SSI). In the Public Housing program, each year 50% of elderly/disabled families received 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 also received approval to expand this flexibility to the Housing Choice Voucher program, and plans to implement this change in FY 2023.
- 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.

Pending implementation of new software, LMHA will cease doing recertifications every 90 days for families who report zero income and instead complete biennial recertifications and implement triennial recertifications for PH households whose only source of income is from SS, SSI and/or pension in late FY 2022 or early FY 2023.

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

No non-significant changes are planned.

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

LMHA will remove the following metrics:

- CE #1: Agency Cost Savings - Though this activity results in significant time savings, cost savings are not realized as staff time is repurposed to serve other core agency functions.

- CE #5: Increase in Agency Rental Revenue – LMHA does not anticipate that the flexibilities provided under this activity will directly increase family’s income and rent share.

## Metrics

<i>CE #2: Staff Time Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total time to complete the task prior implementation: 10,827 hours  Number of Regular Recertifications PH: 2,672  HCV: 8,155  Time per recertification: 1 hour	Total time to complete the task: 5,007 hours  Number of Regular Recertifications PH: 1,153  HCV: 3,854  Time per recertification: 1 hour		
*Baseline reflects data prior to implementation of biennial and triennial recertifications. Benchmark reflects post implementation of biennial and triennial recertifications				

## 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 is 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**

LMHA will remove the following metrics:

- CE #5: Increase in Agency Rental Revenue –LMHA does not anticipate that the elderly and near elderly families who benefit from this activity will increase their income and rent share as a result of this activity.
- HC #4: Displacement Prevention – This activity is intended to promote housing choice among elderly and near elderly participants and applicants; families assisted through this activity are not at-risk of displacement.

### **Metrics**

<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?



Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	105		
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### **Planned Significant Changes**

No significant changes are planned.

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

LMHA 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 2023.

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 who is employed at the time of eligibility screening. 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

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 2010: No HHs affected by policy	\$542		
<i>SS #7: Increase in Agency Rental Revenue*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total household contributions towards housing assistance (increase)	As of FY 2019** \$267	\$272		
*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:

- ***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 \$238 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 2023, LMHA anticipates utilizing two (2) public housing units for the University of Louisville's Kentucky Spinal Cord Injury Research Center and three (3) units for the YouthBuild Louisville program. Public Housing units under the Family Scholar House partnership, which were previously listed in this activity, have been placed under the proposed Activity #2023-01: Special Referral MTW Public Housing Program.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

LMHA will remove the following metrics from this activity:

- CE #2: Staff Time Savings – This activity does not result in staff time savings.
- SS #1: Increase in Household Income – LMHA does not anticipate that families will increase their household income while participating in this activity, as YouthBuild requires participation in training and education programs and participants in the KSCIRC program are recovering from spinal cord injuries.

### Metrics

<i>SS #3: Increase in Positive Outcomes in Employment Status</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	As of FY2014: 0	0		
Employed Part-Time	As of FY2014: 0	3		
Enrolled in an Educational Program	As of FY2014: 0	0		
Enrolled in a Job Training Program	As of FY2014: 0	3		
Unemployed	As of FY2014: 0	2		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	As of FY 2014: 0	5		
<i>SS #8: Households Transitioned to Self Sufficiency*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	As of FY 2014: 0	3		
<i>*Self-Sufficiency is defined as a participant exiting the program for any other reason than termination of subsidy/participation.</i>				
<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).	<b>As of FY 2014:</b> 0	5		
<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:</b> 0	5		

### **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

Upon HUD approval, LMHA will modify its policy on contract rent increases. In order to reflect rent increases that are consistent with year-to-year changes in Fair Market Rents (FMRs), LMHA will limit the landlord's requested rent to the lower of: the average increase in FMRs or the applicable exception payment standard. LMHA will apply a rent increase floor of 2% in the event that the average change in payment standards is less than 2%. LMHA will continue to conduct RR determinations on a random sample of the units where rent increases were requested. To calculate the average increase in FMRs, LMHA will determine the average year-to-year percent change for one, two, three, and four bedroom units, which reflect the majority of units in the HCV program. Averages will be rounded down.

### Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

### Metrics

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
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		
*FY 2014 is the earliest year for which data is available.				
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?



PHA rental revenue in dollars (increase).	<b>As of FY 2019**</b> \$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 during FY 2022 with the final phase of study participants transitioning to standard MTW rent and recertification policies prior to the start of FY 2023. Accordingly, LMHA will close this activity out in the FY 2022 MTW Report.

Families who participated in the study received notice prior to their transition from rent study policies, which included information on MTW rent and recertification policies.

### 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>
<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) +	<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		

	\$4.78 (mail + 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)		
<i>*LMHA is not currently tracking traditional and streamlined interim certifications separately. All interim certifications have been reported as traditional interim certifications.</i>				
<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 affordable and mixed income housing. In some instances, acquired 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 primarily 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 (LMHADC), undertook the first acquisition under this activity and purchased Newbridge Place, a family apartment complex. LMHA provided an acquisition loan to LMHADC for the purchase price of Newbridge Place. 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.

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.

In FY 2023, LMHA will continue to look for acquisition opportunities, including but not limited to, the purchase of additional tax credit properties. Such acquisitions would not fall within the 110-unit cap placed on the purchase of PBV units in furtherance of the CNI Transformation Plan.

**Planned Non-Significant Changes**

No non-significant changes are planned.

**Planned Changes to Metrics/Data Collection**

LMHA will remove the following metrics:

- SS#6: Reducing Per Unit Subsidy Costs for Participating Households – Households residing in tax credit units do not receive on-going subsidy. This metric is not applicable to this activity.

- SS #7: Increase in Agency Rental Revenue – LMHA does not receive rental revenue from tenants residing in tax credit units. This metric is not applicable.
- CE #1: Agency Cost Savings – This activity is intended to increase the number of affordable and mixed income housing units available to low-income families; LMHA does not anticipate that this activity will result in cost savings.

## 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).	As of 2017: 0	205		
* Total number of tax credit units developed by LMHA				
<i>HC #5: Increase in Resident Mobility</i>				
Unit of Measurement	Baseline	Benchmark*	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	As of FY 2017: 0	103		
* Projected number of households residing in tax credit units, excluding those households participating in HCV.				

## 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.

Accordingly, LMHA revised and expanded this activity, in order to strengthen incentives for owners to make new units available for leasing to HCV program participants. To date, LMHA has implemented the following incentives for owners:

- **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  $\$600 * 2 - \$400 = \$800$ .

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 months' 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.

The following incentives have not yet been implemented, but LMHA reserves the right to do so in future:

- **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>
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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 (both interim and regularly-scheduled).
- 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 (both interim and regularly-scheduled). 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 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.
- Damage loss payments. 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.

In FY 2023, LMHA plans to enter into AHAP or HAP contracts for 336 units at four (4) sites, in addition to 676 units at 11 developments already under an AHAP or HAP contract.

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

Upon HUD approval, LMHA will utilize the LIHTC program's Tenant Income Certification to verify income and assets both for determining eligibility at admission and at recertification (both interim and regularly-scheduled) for a PBV property which has received conditional LIHTC approval.

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

LMHA has updated benchmarks for CE #1: Agency Cost Savings to reflect that LMHA does not anticipate project-basing any LMHA-owned units for the first time in FY 2023, although it reserves the right to do so should an appropriate property be located. CE #4: Increase in Resources Leveraged and HC #1: Additional Units of Housing Made Available have also been updated to reflect the anticipated volume of newly project-

based units in FY 2023; and HC #4: Displacement Prevent and HC #5: Increase in Resident Mobility have been updated to reflect the anticipated volume of existing and newly project based units. LMHA does not anticipate that the flexibilities provided by this activity will result in time savings and will remove CE #2: Staff Time Savings

## 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	\$0 Savings		
<i>* LMHA does not anticipate project-basing any LMHA-owned units in FY 2023. The benchmark reflects annual cost savings related to waiver of the independent entity requirement for LMHA-owned units.</i>				
<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)	\$64,003,632 (\$190,487 (TDC for a 2-BR walkup) x 336units)		
<i>*Represents average TDC for a 2 BR unit times the number of new PBV units anticipated in the fiscal year.</i>				
<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)	336 units		
<i>* Represents the total number of new PBV units by the end of the fiscal year.</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).	As of FY 2017: 65 months	63 months		
<b>HC #4: Displacement Prevention</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.	<b>As of FY 2017:</b> 23 households moved (no assistance lost)	1,012 households		
<i>* Represents the total number of all new and existing PBV units</i>				
<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).	As of FY 2019: 0 (no PBV units)	1,012 households		
<i>* Represents the total number of all new and existing PBV units</i>				

### 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 Public Housing (PH) and Housing Choice Voucher (HCV) residents, including those participating in the PBV program.

- 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, SSI, and/or pension. 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, SSI, and/or pension.

- 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 2022, this premium is \$170.10 per month, or \$2,041 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.

- 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**

Using its MTW flexibility, LMHA will adopt a policy of excluding guaranteed income payments of up to \$6,000 annually received by LMHA families participating in the YALift! guaranteed income pilot, which is being administered by Louisville Metro Government, Metro United Way, Russell: A Place of Promise, and Mayors for Guaranteed Income. In FY 2023, LMHA anticipates that select Public Housing and HCV families will participate in this pilot guaranteed income program, which provides a monthly payment of \$500 over a 12-month period. The program seeks to increase economic stability among 18-24 year olds in high poverty neighborhoods. Program partners anticipate that providing such income support will allow the family to fully pursue their educational and career goals, objectives which align well with LMHA's goal to provide incentives to families to obtain employment and become economically self-sufficient.

In FY 2023, LMHA will discontinue its policy of excluding all full-time student earned income for Public Housing residents and HCV participants. LMHA will apply standard HUD policies regarding the income of full-time students, excluding all but \$480 of their earned income.

Additionally, LMHA will also discontinue its policy of excluding all adoption assistance payments. LMHA will apply standard HUD policies regarding such income, and exclude all but \$480 of adoption assistance payments.

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

LMHA will remove the following metrics:

- CE #1: Agency Cost Savings - Though this activity results in significant time savings, cost savings are not realized as staff time is repurposed to serve other core agency functions.
- CE #5: Increase in Agency Rental Revenue and CE #6: Reducing Per Unit Subsidy Costs for Participating Households – The flexibilities provided under this activity are not intended to increase family's income and rent share, and decrease the family's subsidy.
- SS #1: Increase in Household Income and SS #3: Increase in Positive Outcomes in Employment Status – The flexibilities provided under this activity are not intended to directly impact household income or employment, as no supportive services are provided under this activity.
- SS #5: Households Assisted by Services that Increase Self Sufficiency – No supportive services to increase self-sufficiency are provided through this activity.

### **Metrics**

<i><b>CE #2: Staff Time Savings</b></i>
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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  Number of hours per recertification: 1  Total number of regular recertifications: 10,827	Total time to complete task: 5,414 hours  Number of hours per recertification: 1  Total number of regular recertifications: 5,414		
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage – decrease)	Not Tracked	5%		
<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease)	PH: 69 HCV: 413	PH: 68 HCV:405		
<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).	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 2021 and 2022 was less than 5%, and as such LMHA will not update the flat rent schedule.

### Planned Non-Significant Changes

No non-significant changes are planned.

### Planned Changes to Metrics/Data Collection

LMHA will remove the following metrics:

- CE #1: Agency Cost Savings – Eliminating the requirement to complete flat rent update transactions annually has resulted in significant time savings. However, LMHA has re-allocated this staff time to address other core property management functions.
- CE #5: Increase in Agency Rental Revenue – LMHA does not anticipate that this activity will result in an increase in agency rental revenue.

### Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?



Total time to complete the task in staff hours (decrease).	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		
<b><i>CE #3: Decrease in Error Rate of Task Execution</i></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%		

### **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 has developed 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 Project Based HAP Contract, and the Privacy Act Notice. 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 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.

In FY 2023, LMHA plans to develop and implement a local version of the Request for Tenancy Approval, which incorporates MTW HCV leasing and owner policies. LMHA will continue to explore options for additional local form development 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

LMHA will remove CE #1: Agency Cost Savings as this activity is not expected to result in cost savings. While the activity streamlines and reduces the amount of staff time to complete required tasks, staff time is re-allocated to other core program functions. Additionally, the benchmark for CE #2: Staff Time Savings will be updated to reflect the number of PBV HAP contracts which LMHA anticipates entering in FY 2023.

### Metrics

<i>CE #2: Staff Time Savings</i>
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Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	<p>Total staff time required prior to implementation: 22 hours</p> <p>Contracts executed in FY 2019: 11</p> <p>Time to prepare HAP contract prior to implementation: 2 hours</p>	<p>Total staff time required after implementation: 1 hour</p> <p>Expected HAP contracts executed in FY 2023: 1</p> <p>Time to prepare contract after implementation: 1 hour</p>		
<p><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.</i></p> <p><i>**Benchmark reflects the number of new PBV contracts anticipated in FY 2023</i></p>				

### 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 \$25,000 per household. Generally, incentive payments count toward the \$25,000 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).
- 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.
- 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 \$25,000 escrow cap.

- Opportunity for adults, other than the head of household, to fulfill work requirements. 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.).
- Flexibility to provide participating families an additional period of up to six (6) months to complete ITSP goals before the contract terminates, after 30 percent of their monthly adjusted income equals or exceeds the existing Fair Market Rent (FMR). 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.
- Modification of FSS CoP 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**

Upon HUD approval, LMHA will provide an additional incentive payment to graduating families who have not experienced a significant increase in earnings during their participation in the FSS program but have met all program requirements and completed their Contract of Participation (COP). Specifically, if a family has less than \$500 accrued in their escrow at the time of graduation, LMHA will provide an additional payment to supplement the family’s total escrow savings, so that the family receives at least \$500 upon graduation. For example, if a graduating family has \$250 in escrow, LMHA will provide an incentive payment of \$250 to the family at graduation. If the graduating family has accrued \$500 or more in escrow, LMHA will not supplement their escrow through this incentive payment.

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

LMHA will remove SS #6: Reducing Per Unit Subsidy Cost for Participating Households and SS #7: Increase in Agency Rental Revenue. LMHA does not anticipate a decrease in the per unit subsidy cost for FSS participants; increases in the participant’s rent (resulting from the increases in earned income) are credited to the participant’s escrow account and do not reduce their subsidy.

## Metrics

SS #1: Increase in Household Income*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	PH: \$17,346 HCV: \$19,429	PH: \$17,693 HCV: \$19,818		
*Average earned income is calculated for households with earned income.				
SS #2: Increase in Household Savings*				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy (increase).	PH: \$2,452 HCV: \$2,873	PH: \$2,501 HCV: \$2,930		
*Average amount of savings/escrow for households with savings/escrow.				
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed full-time or part-time	PH: No. Employed: 51 % Employed: 63%  HCV: No. Employed: 87 % Employed: 67%	PH: No. Employed: 53 % Employed: 65%  HCV: No. Employed: 89 %: Employed: 68%		
Unemployed	PH: No. Unemployed: 30 % Unemployed: 37%  HCV: No. Unemployed: 43 % Unemployed: 33%	PH: No. Unemployed: 28 % Unemployed: 35%  HCV: No. Employed: 41 % Employed: 32%		
Enrolled in Education	PH: 4  HCV: 14	PH: 5  HCV: 15		
Enrolled in Job Training	PH: 1  HCV: 1	PH: 2  HCV: 2		
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households receiving TANF assistance (decrease).	PH: 0 HCV: 6	PH: 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 #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.

LMHA may to use this financing tool in FY 2023 or in future fiscal years to support a pipeline of ongoing redevelopment efforts using PBV assistance in both existing housing and new construction settings. LMHA expects that the flexibilities under this activity could 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 will 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). Low-income homeowners served under this activity may be significantly cost-burdened and 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 homeownership assistance payments once the home passes HQS inspection and the family has entered into a 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 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 contract with the homeowner and LMHA will commence providing homeownership assistance payments for a term consistent with HCV 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.

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 subsidy for the households to be served under this will also be calculated consistent with the methodologies used in the HCV Homeownership program including term limits on the subsidy while ensuring that the family remains in their home.

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.

In FY 2023, LMHA anticipates assisting 21 low-income homeowners through this activity.

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

In FY 2023, LMHA will partner with the Louisville Metro Government's Home Repair program to assist homeowners in identifying qualified contractors to complete repairs required to comply with HQS and begin receiving homeownership assistance. The Home Repair program maintains a pool of qualified contractors who will submit bids for the homeowner's requested repair(s).

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

LMHA will update the benchmark for HC #2: Units of Housing Preserved based on the anticipated number of households who will receive assistance through this activity in FY 2023.

## Metrics

<b>HC #2: Units of Housing Preserved</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: 21		
<i>*Represents households served in FY 2023 and not the total served during the lifetime of this activity.</i>				
<b>HC #4: Displacement Prevention</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: 21	Expected households losing assistance/moving after implementation of the activity: 0		

## Planned Significant Changes

No significant changes are planned.

## Activity #2021-2: Emergency Waivers

### Plan Year Approved, Implemented, Amended

Approved FY 2021, Implemented FY 2021.

### Description/Update

The COVID-19 outbreak continues to threaten 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. The Coronavirus Aid, Relief and Economic Security (CARES) Act provided 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. Though the majority of these waivers and alternative requirements recently expired, the impact of the pandemic on low-income families persists.

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 the majority of Public Housing (PH) households with those paying \$0 rent on an annual schedule and those on flat rents or with fixed incomes on a triennial cycle. 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.

Subject to the continued state of emergency, LMHA will continue to use emergency waivers in FY 2023 related to briefing, delayed re-examinations, increases in the payment standard, and Homeownership HQS in the HCV program; and will also continue to use waivers related to Administrative Plan and Admissions and Continued Occupancy Policies and verification of income in both the HCV and Public Housing

programs. LMHA will reserve the right to implement other waivers and alternative requirements authorized under in this activity in FY 2023 and future fiscal years.

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

No non-significant changes are planned.

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

LMHA will remove CE #1: Agency Cost Savings. The waivers and alternative requirements provided under this activity do not result in cost savings, as staff time saved is re-allocated to other core functions.

### **Metrics**

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	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

### Plan Year Approved, Implemented, Amended

Approved FY 2021, Implemented FY 2021.

### 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 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

In FY 2022, LMHA disbursed all remaining MTW funds for COVID-19 rental assistance under this activity. Accordingly, this activity will be closed out in the FY 2022 MTW Report.

### Planned Changes to Metrics/Data Collection

Benchmarks for this activity are updated to reflect that LMHA anticipates that the remaining funding for this activity will be expended prior to the start of FY 2023.

### Metrics

<i>HC #4: Displacement Prevention</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?

Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box	0	0		
<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	0		
<i>*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.</i>				
<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	0		

### Planned Significant Changes

There are no significant changes planned.

## Activity #2022-1: MTW Utility Allowances

### Plan Year Approved, Implemented, Amended

Approved FY 2021, Implemented FY 2021.

### Activity Description

LMHA will continue to implement changes to its utility allowance (UA) policies for the Public Housing program. LMHA anticipates that these changes will continue to benefit both residents and staff by reducing utility costs for tenants and reducing the administrative burden of billing and collection for utilities.

Using its MTW authority, LMHA has eliminated the requirement to bill Public Housing families for utility consumption in excess of the established utility allowance. Prior to implementation of this change, LMHA was required to monitor individual check-meters and bill families whose consumption exceeded the allowance. Eliminating the requirement has allowed LMHA to re-allocate limited resources to core property management functions. LMHA will continue to pilot this change to determine if the improvements in property management and service to residents continue to justify the loss of excess utility revenue.

### Planned Non-Significant Change

There are no non-significant changes planned.

### Planned Changes to Metrics/Data Collection

LMHA will remove the following metrics:

- CE #1: Agency Cost Savings – Though LMHA has benefited from considerable staff time savings, this activity has not resulted in cost savings as staff time is re-allocated to other property management functions.
- CE #3: Decrease in Error Rate of Task Execution – Through this activity, LMHA eliminated the required task of calculating charges for excess utility consumption. As such, this metric is no longer applicable.

### Metrics

<i>CE #2: Staff Time Savings</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)*	Total time to complete task: 2,064 hours	Total time to complete task: 0 hours		
	Number of hours to (complete task): 0.636	Number of hours to (complete task): 0		
	Total number of (tasks to complete): 3,244	Total number of (tasks to complete): 0		

<i>* Accounts for time savings realized by eliminating billing for excess utility consumption in Public Housing.</i>
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**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 2023 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**

Not applicable.

## 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.
Public Housing Sub-lease Agreement with Catholic Charities (Activity #2010-1, formerly Activity #25-2010)	FY 2010	FY 2021	The Public Housing Sub-lease Agreement with Catholic Charities activity allowed LMHA to establish a sub-lease agreement with Catholic Charities to provide emergency housing for victims of human trafficking. This activity was closed out as a result of a HUD OGC investigation of the use of public housing as emergency housing for victims of human trafficking which found that it was not feasible under MTW to permit families who could not produce valid identification to live in public housing communities.



## V. Planned Application of MTW Funds

### A. Planned Application of MTW Funds

Tables 13 and 14 below provide estimated sources and uses of MTW funds for FY 2023. 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 2023 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 2023**

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$9,104,561
70600	HUD PHA Operating Grants	\$153,571,898
70610	Capital Grants	\$869,300
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$231,947
71100+72000	Interest Income	\$418,274
71600	Gain or Loss on Sale of Capital Assets	\$-
71200+71300+71310+71400+71500	Other Income	\$12,046,604
<b>70000</b>	<b>Total Revenue</b>	<b>\$176,242,584</b>

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

**Table 14: Estimated Application of MTW Funding for FY 2023**

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$22,742,331
91300+91310+92000	Management Fee Expense	\$477,538
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$4,638,529

<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$8,198,807
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$15,961,084
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,945,058
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,799,811
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$3,275,973
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$17,686,592
97300+97350	Housing Assistance Payments + HAP Portability-In	\$85,041,917
97400	Depreciation Expense	\$4,868,381
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>		<b>\$166,636,020</b>

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

LMHA anticipates that estimated revenue will exceed estimated expense because of operations in "other business activities," including those connected with the Beecher Terrace CNI and the potential acquisition of partnership interests in mixed finance public housing properties.

***ii. Description of Planned Application of MTW Funding 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 \$8,593,000 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 \$8,679,000 in the Public Housing Program for calendar year 2022 and 2023, 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 \$3,540,000 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.

- Affordable (public housing, LIHTC, PBV, etc.) and mixed-income acquisition and development; mixed-income development at Iroquois Homes; other misc. projects (approx. \$9,816,267).
- 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. \$2,639,000).
- To acquire 76 units and retire related debt at Liberty Green Phase II, a tax-credit project that will reach the end of its tax-credit compliance period (approx. \$10,000).
- To supplement on-site development at Beecher Terrace associated with the CHOICE grant (approx. \$14,576,000)
- To supplement the CHOICE grant for recreational amenities on and near the Beecher Terrace site (approximately \$12,360,000 to make improvements on the former Porter Paints site and the Baxter Community Center). LMHA plans to utilize MTW funding to renovate and expand the Baxter Community Center, located on-site at Beecher Terrace, and to develop a playground and other recreational amenities on a parcel located at 13th St. and Muhammad Ali Blvd. Both the community center and park will serve Beecher Terrace PBV and other low-income families.
- To acquire off-site PBV units, provide gap financing, and/or other Choice-related development, such as mixed-use development at 13<sup>th</sup> and Muhammad Ali Blvd. (if funds not needed for off-site replacement housing) associated with the Beecher Terrace CHOICE grant (approx. \$5,807,000)
- To provide forgivable loans associated with the local, nontraditional Homeownership Preservation Program (approx. \$2,500,000)

## B. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning FY 2023 – Unspent Balances	Planned Application of Unspent Funds during FY 2023
HCV HAP	\$59,841,267	\$59,841,267
HCV Admin Fee	\$-	\$-
PH Operating Subsidy	\$13,468,229	\$-
<b>Total</b>	<b>\$73,309,496</b>	<b>\$59,841,267</b>

### Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

LMHA plans to use Public Housing operating subsidy reserves to off-set future anticipated PH-AMP budget deficits. LMHA is currently maintaining a reserve amount equivalent to six months of operations.

Additionally, LMHA plans to use unspent HCV HAP reserves for the uses listed in the table below.

No.	Description of Planned Use: Unspent HCV HAP	Dollar Amount	Timeline
1.	2023 PH Ops Shortfall Funding	\$ 8,593,000	FY 2023
2.	2023 COCC Ops Shortfall Funding	\$ 3,540,000	FY 2023
3.	Homeownership Preservation Program	\$ 2,500,000	FY 2023
4.	Liberty Green Rental I - Partnership Transition to LMHA	\$ 2,639,000	FY 2023
5.	Liberty Green Rental II - Partnership Transition to LMHA	\$ 10,000	FY 2023
6.	Beecher Amenities (Baxter & Off-site Improvements)	\$ 12,360,000	Through FY 2024
7.	Beecher Choice Off-site - PBVs, Gap Financing, and/or other CHOICE related development	\$ 5,807,000	Through FY 2024
8.	Beecher Russell CHOICE Grant Implementation	\$ 9,225,000	Through FY 2026
9.	Additional LMHA Funding - Beecher Choice	\$ 5,351,000	Through FY 2026
10.	Affordable & mixed-income acquisition/development (including Iroquois)	\$ 9,816,267	TBD
	<b>Total Planned Uses of Unspent HCV Funds</b>	<b>\$ 59,841,267</b>	

## C. 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.

## D. Rental Assistance Demonstration (RAD) Participation

i. *Description of the RAD Participation*

### RAD FY 2023

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 210 units in total. Closing for the RAD transaction is anticipated in the early part of FY 2023.

#### RAD Near-Term Strategy

LMHA has adopted a Strategic Plan that includes performing Physical Conditions Assessments for the public housing portfolio. A contractor has been selected, allowing unit inspections to begin in early March 2022. Once completed, the various sites will be evaluated and prioritized. The prioritization process will consider capital needs, potential funding, surrounding neighborhood dynamics, near-site development, ease of conversion as well as many other factors. Once prioritized, select sites may be submitted for RAD conversion. As the Choice Neighborhoods Initiative at Beecher Terrace moves toward completion, LMHA will have increased capacity to focus on RAD conversions. While specific sites have not been selected, once a site or multiple sites are selected, LMHA 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 it looks to preserve its Mixed-Finance affordable housing portfolio. After the 15-year LIHTC compliance period and after LMHA obtains ownership of each Liberty Green redevelopment phase, LMHA will consider RAD. LMHA may also consider Sheppard Square Mixed-Finance properties for RAD conversion but must first evaluate the impact of such conversion prior to its acquisition of the Limited Partnership through its option or Right of First Refusal.

LMHA will review market dynamics near public housing sites and may consider RAD at additional sites based on the prioritization process previously mentioned. The prioritization process will identify properties that may be converted quickly while other properties will become part of LMHA’s long term strategy.

**Table 15: RAD Conversions Planned in FY 2023**

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 2023**

<b>Rental Assistance Demonstration (RAD) Participation</b>
LMHA anticipates that the RAD conversion of Beecher Phase IV will be completed by the end of FY 2023.

- 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.

## **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 2023 MTW Annual Plan was made available for public comment from March 18, 2022 through April 18, 2022. 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 29, 2022 at 6 PM. A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 18, 2022. Nine (9) individuals participated in the hearing. Copies of public notices, a summary of comments and responses, and sign-in sheets are attached in Appendix B.

### **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**

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



**CERTIFICATIONS OF COMPLIANCE****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its 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 July 1, 2022, 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.
- (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, 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.
- (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.
- (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.
- (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 75.

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

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- (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)

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## **Board Resolution**

### **AMENDED RESOLUTION NO. 22-2022 (4/19/22)**

#### **APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

##### **Item No. 5G**

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) 2023 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 2023 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, the proposed FY 2023 MTW Annual Plan was made available for public comment between March 18, 2022 and April 18, 2022 and a public hearing was held on March 29, 2022 to discuss the Proposed FY 2023 MTW Annual Plan.

**AMENDED RESOLUTION NO. 22-2022 (4/19/22)**  
**APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

**Item No. 5G**

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2023 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.

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

**AMENDED RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

**Item No. 5G**

**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 (PHA) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to evaluate 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 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 2023 MTW Annual Plan on April 19, 2022 and the Plan will be submitted to HUD by April 22, 2022.

LMHA hired Edgemere Consulting Corporation to assist in the development of MTW Plans and Reports and other related MTW activities. The FY 2023 MTW Annual Plan has been prepared and made available for public comment on March 18, 2022 through April 18, 2022. A public hearing to discuss the proposed Plan was held on March 29, 2022.

**AMENDED RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

**Item No. 5G**

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

LMHA proposes one new activity for FY 2023:

Activity 2023-1: Special Referral MTW Public Housing Program

In FY 2023, LMHA proposes the implementation of a public housing special referral program in partnership with the Family Scholar House. LMHA will provide temporary public housing assistance to families while they work to obtain a college degree or are enrolled as a full-time student in an apprenticeship program. Families will be referred by Scholar House, and eligible households will receive an admissions preference for the public housing program. Participants who successfully graduate from the program will receive a preference for the Authority's Housing Choice Voucher (HCV) Program, if the participant was living in LMHA public housing at the time of program completion.

LMHA also proposes non-significant amendments to the following activities:

Activity 2005-1: Special Referral MTW HCV Programs

In FY 2023, LMHA proposes the provision of additional vouchers to seven existing partner organizations:

1. St. John Center (58 vouchers)
2. Wellspring (55 vouchers)
3. Joshua Community Connectors (20 vouchers)
4. Louisville Metro Government (LMG) Office of Resilience and Community Services (20 vouchers)
5. Volunteers of America Mid-States (20 vouchers)
6. LMG Office of Safe and Healthy Neighborhoods (10 vouchers)
7. My Chosen People (10 vouchers)

LMHA also plans to provide vouchers to three new partner organizations:

1. Hope Buss (10 vouchers)
2. Kentucky Refugee Ministries (10 vouchers)
3. YouthBuild Louisville (10 vouchers)

Activity 2006-1: MTW Homeownership Program

- LMHA proposes a change to the program's eligibility requirements to allow participation by families that include an adult household member working 25-29 hours per week and earning at least 175% of the minimum wage.

**AMENDED RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

**Item No. 5G**

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

- LMHA also proposes the provision of an admissions preference to eligible families purchasing a duplex through the REBOUND homeownership initiative.

Activity 2014-2: HCV Program Rent Increase Limit

LMHA currently caps annual contract rent increases in the HCV Program at 2%. The Authority proposes a change that would better align this cap with annual increases in the Fair Market Rents (FMR). LMHA plans to set the annual cap to the average annual increase in FMRs across 1-4 bedroom unit sizes rounded down to the nearest whole number.

Activity 2015-1: HCV Program – HUD/MDRC Rent Reform Demonstration

The HUD Rent Reform Demonstration study is scheduled to end during FY 2022. The activity will be closed out in the FY 2022 MTW Report.

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

LMHA proposes to extend the use of the Low-Income Housing Tax Credit (LIHTC) Program's Tenant Income Certification form to PBV properties that have received conditional LIHTC approval.

Activity 2020-1: Rent Simplification

- LMHA plans to exclude guaranteed income payments of up to \$6,000 annually received by LMHA families participating in the YALift! guaranteed income pilot.
- LMHA plans to discontinue its policy of excluding all full-time student income and adoption assistance payments. Instead, LMHA will apply standard HUD policies to these income sources, excluding all but \$480.

Activity 2020-4: Family Self Sufficiency (FSS) Program Enhancements

Upon HUD approval, LMHA will provide an additional incentive payment to graduating families who have less than \$500 accrued in their escrow account. LMHA will provide an additional payment to supplement the family's total escrow savings, so that the family receives \$500.

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

LMHA will partner with the Louisville Metro Government's Home Repair Program to assist homeowners in completing repairs required to comply with

**AMENDED RESOLUTION BACKGROUND STATEMENT**  
**APPROVAL OF FY 2023 MOVING TO WORK ANNUAL PLAN**

**Item No. 5G**

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

HUD's Housing Quality Standards (HQS).

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

In FY 2022, LMHA disbursed all remaining MTW funds associated with this activity. The activity will be closed out in the FY 2022 MTW Report.

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

**II. ALTERNATIVES:**

- A. Approve the submission of the proposed FY 2023 Moving to Work Annual Plan.
- B. Partially approve the submission of the proposed FY 2023 Moving to Work Annual Plan.
- C. Do not approve the submission of the proposed FY 2023 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 2023 MTW Annual Plan. Approval of the FY 2023 MTW Annual Plan by Board Resolution is necessary to permit LMHA to update, maximize, and improve the MTW activities.

Submitted by: Sarah Galloway  
Special Assistant to the Executive Director  
April 19, 2022



## Appendix B: Documentation of Public Process

### Public Hearing and Comment Period Advertisement: Newspaper

Courier Journal: March 18, 2022

BY COURIERJOURNAL.COM | FRIDAY, MARCH 18, 2022 | 13B

#### LEGAL

##### INVITATION TO BID

Road Paving and Improvements  
The City of Anchorage, KY, is accepting sealed bids for road paving and improvements within Anchorage City limits. For bid specs. and an appointment to inspect, call Public Works Director Gary Burkhead (502) 245-9700, or see the City website: [www.cityofanchorage.org](http://www.cityofanchorage.org). Sealed bids clearly marked "2022 ROAD IMPROVEMENTS" are due by 12 Noon, Fri., April 8, 2022, at Anchorage City Hall, PO Box 23266, 1306 Evergreen Rd., Anchorage KY 40223. Bids will be opened at 12:15 p.m. on April 8, 2022, at Anchorage City Hall. The City of Anchorage reserves the right to accept or reject any bid. The winning bidder will be required to show evidence of adequate workers' compensation and liability insurance.

##### PUBLIC NOTICES

Louisville Metro Housing Authority (LMHA) - Public Hearing and Public Comment Period for: 1) FY 2023 Moving to Work (MTW) Annual Plan; 2) Changes to Public Housing (PH) Admissions & Continued Occupancy Plan; 3) Changes to Housing Choice Voucher (HCV) Program Administrative Plan; and 4) Disposition of 16 Public Housing Units on Mandick Rd. There will be a public hearing to discuss the topics listed above on March 29, 2022 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://zoom.us>; click on "Join a Meeting"; enter Meeting ID: 860 2299 5173. Passcode: 128263. Draft documents will be available for review and public comment from March 18, 2022 to April 18, 2022 on LMHA's website ([www.lmha1.org](http://www.lmha1.org)); at LMHA's main office (420 S. 8th St.); HCV office (600 S. 7th St.); at PH Management Offices; or by mail as requested. Written comments may be mailed to Housing Authority's main office or emailed to [dixius@lmha1.org](mailto:dixius@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) 569-6933. TDD: (502) 587-0831.

#### NOTICE: RECORDS DESTRUCTION STUDENTS PREVIOUSLY ENROLLED IN SPECIAL EDUCATION JEFFERSON COUNTY PUBLIC SCHOOLS

Official notification of our intent to destroy records no longer needed to provide educational services to students born between January 1, 1994 and December 31, 1996, and whose last date of service in the special education program was over three years ago. The above-mentioned records will be destroyed after May 1, 2022. Eligible former students or their guardians may obtain a copy of data used in the special education program. Requests must come before May 1, 2022, after which the records shall be shredded. A permanent record card (transcript) may be obtained without time limitations. Questions? Please contact Jim Cundy, Archives Supervisor, Jefferson County Public Schools, 502-485-3098.

#### STATE OF NORTH CAROLINA WATAUGA COUNTY IN THE GENERAL COURT OF JUSTICE DISTRICT COURT DIVISION FILE NOS: 21 JA 12; 21 JA 13 IN THE MATTER OF: MINOR CHILDREN: S.J. (DATE OF BIRTH: 01-10-2012) and C.J. (DATE OF BIRTH: 01-10-2012) VS.: SHAWN AARON JENKINS OR UNKNOWN FATHER OF TWIN FEMALE JUVENILES BORN JANUARY 10, 2012, RESPONDENT

Take notice that a pleading seeking adjudication in Watauga County Juvenile Court of twin female juveniles born January 10, 2012, has been filed in the above-entitled action, this Notice of Service of Process by Publication shall officially begin on Friday, March 4, 2022 (or as soon thereafter as it is able to be put in publication after being received by the Kentucky Press Association) and run for three (3) consecutive weeks. You are also entitled to a court-appointed attorney. Andrew Brooks, Esq., Attorney at Law, has been appointed to assist you in this matter and his contact information is below: Andrew Brooks, Esq., 890 West King St., Suite 204, Boone, NC 28607; (828) 263-0505. You are required to make defense to such pleading not later than April 13, 2022, and upon your failure to do so, the party

Day Ferguson & Ferguson, LLC d/b/a Railyard Billiards & Sports Pub, with a mailing address of 4510 Charlestown Rd., Suite 222, New Albany, IN 47150, hereby declares its intentions to apply for a Quota Retail Drink License, Quota Retail Drink Extended Hours (12AM to 2AM) License, Quota Drink Extended Hours (2AM to 4AM) License, and Special Sunday Retail License, all not before April 16, 2022. The licensed premises will be located at 630 Barret Avenue, Louisville, Kentucky, 40204. The members of Day Ferguson & Ferguson, LLC are as follows: Kyle Ferguson, 7034 Plum Creek Drive, Sellersburg, IN 47172; Jay Ferguson, 5427 Hawthorn Glen, Charlestown, IN 47111; and Donald Stephen Day, 1025 Castlewood Drive, New Albany, IN 47150. Any person, association, corporation, or body politic may protest the granting of the licenses by writing the Department of Alcoholic Beverage Control, 500 Mero Street 2NE33, Frankfort, Kentucky, 40601, within thirty (30) days of the date of legal publication.

#### NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

##### REQUEST FOR RELEASE OF FUNDS

On or about April 4, 2022 the Louisville/Jefferson County Metro Government will authorize the Louisville Metro Housing Authority to submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of Project Based Voucher funds from the Section 8 Housing Choice Vouchers Program under the Multifamily Assisted Housing Reform and Affordability Act of 1997 (42 U.S.C. 1437f) to undertake the Prestonian, a multifamily housing project located at 709 E Gray Street Louisville, KY 40202. The proposed development involves the new construction of two separate apartment buildings to be known as the Prestonian North and Prestonian South. The main building to the north is a four-story residential structure over one level of underground parking. The second building to the south is a four-story corridor-style residential building with brick and hard plank exterior. Both apartment buildings will contain one, two, and three-bedroom affordable rental units. There will be a total of 342 units: 135 one-bedrooms, 146 two-bedrooms and 61 three-bedrooms. One hundred fifty-one (151) of the units will have Section 8 Project Based Vouchers (PBVs). The PBV units will consist of sixty-seven (67) one-bedroom units, sixty-two (62) two-bedroom units, and twenty-two (22) three-bedroom units. The proposed corridor-style apartment community will include amenities such as on-site management, clubhouse, fitness center, lounges, picnic area, and a business center. Unit amenities and appliances include a microwave, dishwasher, blinds, oven, washer/dryer hookup, refrigerator, and ceiling fans. The properties involved are owned by the developer, LDG Multifamily LLC. Many of the lots are vacant land or a parking lots however, the project includes the demolition of the closed Multi-Metals factory located at 709 E Gray Street and cleanup of environmental contamination on the site. The existing commercial buildings at 626 S. Shelby Street and storage buildings will also be demolished. The Project-Based Vouchers will be provided by the Louisville Metro Housing Authority and will provide relocation options for Beecher Terrace residents being relocated as a result of the demolition of the Beecher Terrace public housing site. The project is located in Census Tract 59. The total Funding for \$77,000,000 project is \$77,000,000.

##### FINDING OF NO SIGNIFICANT IMPACT

The Louisville/Jefferson County Metro Government has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) (PL-91-190) is not required. An Environmental Review Record (ERR) respecting the within project has been made by the Louisville/Jefferson County Metro Government which documents the environmental review of the project and more fully sets forth the reasons why such Statement is not required. Additional project information is contained in the ERR. THE ERR is available by email request to [Laura.Grabowski@louisvilleky.gov](mailto:Laura.Grabowski@louisvilleky.gov) or electronically online at the following website: <https://louisvilleky.gov/government/housing/public-notices-federal-plans-and-project-compliance>

##### PUBLIC COMMENTS

All interested agencies, groups, and persons disagreeing with the

#### NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS Prestonian, 709 E Gray Street, Louisville, KY 40202

March 18, 2022

Laura Grabowski, Director of Housing and Community Development  
Louisville/Jefferson County Metro Government  
Develop Louisville  
444 S 5th Street, Suite 500  
Louisville, KY 40202  
(502) 574-3737 [Laura.Grabowski@louisvilleky.gov](mailto:Laura.Grabowski@louisvilleky.gov)  
TTY/Voice 711

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the Louisville/Jefferson County Metro Government

##### REQUEST FOR RELEASE OF FUNDS

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##### PUBLIC COMMENTS

All interested agencies, groups, and persons disagreeing with the ERR decision are invited to submit comments by email for consideration by the Louisville/Jefferson County Metro Government to [Laura.Grabowski@louisvilleky.gov](mailto:Laura.Grabowski@louisvilleky.gov), Director of Housing and Community Development.

## Resident Flyer

LOUISVILLE METRO HOUSING AUTHORITY

# Public Hearing

### Why?

To get your input on:

- FY 2023 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
- Disposition of 16 Public Housing Units on Manslick Rd.

### When?

Tuesday, March 29, 2022 at 6:00 P.M.

### Where?

Zoom Web Conference ([www.zoom.us](http://www.zoom.us))

Meeting ID: 860 2299 5173

Passcode: 128263#

You may also call 1-312-626-6799 and use the passcode above (128263)

Drafts of these documents will be available for review from March 18 through April 18, 2022 on the agency's website ([www.lmha1.org](http://www.lmha1.org)); at the Central Office (420 S. 8th St); at the Housing Choice Voucher Office (600 S. 7th St.); at public housing Management Offices; or you can call (502) 569-6933 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) 569-6933. TDD: (502) 587-0831.



## Public Hearing Sign-In Sheet

Name	Affiliation
Sam Dixius	LMHA
Tonya Wise	LMHA
Jeff Ralph	LMHA
Dan Farrell	LMHA
Sarah Galloway	LMHA
Deborah Gilbert	LMHA
Ed Collins	No affiliation
502-224-0759	No affiliation
502-631-8949	No affiliation

# Louisville Metro Housing Authority Fiscal Year 2023 MTW Plan

## Comments & Responses

### Comments from Coalition for the Homeless



Coalition for the Homeless  
louhomeless.org

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

502.636.9550  
502.636.9950 fax

**COALITION  
FOR THE  
HOMELESS**

April 3, 2022

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

Dear Ms. Osanka,

The Metro Louisville Continuum of Care board, The Coalition for the Homeless and Metropolitan Housing Coalition would like to once again thank Louisville Metro Housing Authority for the leadership you have provided in Louisville's efforts to end veteran, chronic and now youth homelessness through preferences, partnerships and set asides in LMHA resources. We also thank you for your willingness to step forward to lead the community in the effort to house the most vulnerable during the COVID-19 crisis. You have been an amazing partner in helping to house the homeless during this difficult time and in advancing additional fair housing protections and improved inspection processes.

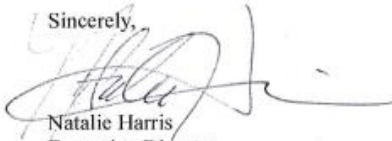
Today, we are writing to provide our support and thanks for the proposed changes to the LMHA FY 2022 Moving to Work (MTW) Annual Plan and Admissions and Continued Occupancy Plan (ACOP). We are especially supportive of additional vouchers targeted to Wellspring, Inc. that will make it possible to create 50 new units of permanent, supportive housing in Louisville for disabled persons experiencing homelessness.

Additionally, we thank you for extending the efforts to house the most vulnerable homeless persons through referrals made by the Family Health Centers' Common Assessment Team. We strongly support the continuation of meetings and reviews being held virtually, and the minimization of the number of meetings necessary to access housing whenever possible.

Finally, we continue to encourage LMHA to help to address the extreme segregation in Metro Louisville by working toward small area rents that encourage movement of voucher programs to less impacted communities. We were excited to see a demonstration through the EHV voucher program.

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

Sincerely,

  
Natalie Harris  
Executive Director  
Coalition for the Homeless

  
Tony Curtis  
Executive Director  
Metropolitan Housing Coalition

## LMHA Response to Comments from Coalition for the Homeless



April 15, 2022

Ms. Natalie Harris  
Coalition for the Homeless  
1300 S. 4<sup>th</sup> St., Suite 250  
Louisville, KY 40208

Mr. Tony Curtis  
Metropolitan Housing Coalition  
2821 Klempner Way  
Louisville, KY 40205

Dear Ms. Harris and Mr. Curtis,

Thank you for your letter regarding the Louisville Metro Housing Authority's draft FY 2023 Moving to Work Annual Plan.

The Housing Authority appreciates your positive comments regarding the provision of special referral vouchers to Wellspring, the Family Health Centers' Common Assessment Team referral process, and the Small Area Fair Market Rents pilot the Authority is conducting through its Emergency Housing Voucher Program.

We appreciate your continued partnership and thank you for all you do to combat houselessness and to advocate for affordable housing in the Louisville community.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Osanka".

Lisa Osanka  
Executive Director

## Comments from REBOUND and LMHA Response

**From:** [Samuel Dixius](#)  
**Sent:** Friday, March 18, 2022 1:08 PM  
**To:** [Kevin Dunlap](#)  
**Subject:** RE: LMHA Public Comment Period March 2022

Mr. Dunlap,

Thank you for the correction. Right now, we are collecting public comment on the proposed changes which will be presented to the Board before they are officially adopted. LMHA can and will adjust the language to correctly reflect the nature of your organization in the final adoption of the documents.

Please let me know if you have other concerns or comments about any of the proposed changes.

Sincerely,

Sam Dixius

Sam Dixius  
Compliance Manager  
Louisville Metro Housing Authority  
Office – 502-569-6933  
Cell – 502-965-8462

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**From:** [Kevin Dunlap](#)  
**Sent:** Friday, March 18, 2022 1:02 PM  
**To:** [Samuel Dixius](#)  
**Subject:** Re: LMHA Public Comment Period March 2022

Mr Dixius,

Thanks for sharing these documents. However, I wish I had the opportunity to review before they were published. REBOUND, Inc. is mischaracterized as a program of the Louisville Urban League. This is totally incorrect in that REBOUND is a separate entity and acts totally autonomous from the Urban League.

**Kevin L. Dunlap**

Executive Director

REBOUND, Inc.

1535 West Broadway

Louisville, KY 40203

(502) 566-3369

## Comments from St. John Center



Ms. Lisa Osanka, Executive Director  
Louisville Metro Housing Authority  
413 East Muhammad Ali Blvd  
Louisville, KY 40202

**RE: MTW Annual Plan for FY23**

Dear Ms. Osanka:

St. John Center appreciates the opportunity to comment on the LMHA Annual Plan for FY23. This comment period comes at a critical time for our organization as we embark on the development of a flagship supportive housing project in Louisville. Never before has Metro Louisville made such dramatic and impactful investments in ending chronic homelessness. At this point, support from LMHA is absolutely critical.

Specifically, St. John requests the allocation of 29 project-based vouchers for our new development. Supportive housing is an evidence-based housing intervention designed for those at highest risk of dying on the streets. It entails rent that is affordable for people with no or extremely low-incomes, and offers intensive home-based services directed by the tenant.

We anticipate an award of \$17.5M from Metro Louisville through a competitive award process for ARP funds. We intend to develop 58 one-bedroom units in a building with supportive services on-site, and are requesting project based vouchers for 50% of the units.

The proposed supportive housing development will need operating and supportive services funding. We are working with the local Continuum of Care to secure some of that funding, but we are clear that we will need vouchers for operations in order for the project to proceed.

Project-based vouchers allow the greatest possible stability for what will be the first-of-its kind development in Metro Louisville. However, if there is truly no option for project-based vouchers, we would like to expand our participation in the Referral Voucher Program, with an allocation of 58 vouchers, so long as these vouchers could be back-filled as tenants move up from the need for the intensive level of support provided in the new development.

We look forward to support from LMHA to address the urgent need for supportive housing in our community.

Sincerely,

Ra'Shann Martin, Executive Director



## LMHA Response to Comments from St. John Center



April 15, 2022

Ms. Ra'Shann Martin  
St. John Center  
700 E. Muhammad Ali Blvd.  
Louisville, KY 40202

Dear Ms. Martin,

Thank you for your letter regarding the Louisville Metro Housing Authority's (LMHA) draft FY 2023 Moving to Work Annual Plan.

While LMHA actively supports the development of Supportive Housing in our community, we are not in a position to offer Project-Based Vouchers to your project at this time. Instead, we conditionally approve your request for 58 special referral vouchers. The provision of these vouchers is contingent upon approval by the LMHA Board of Commissioners and HUD.

Moreover, while the special referral program generally allows new vouchers to be issued as tenants leave the program, this ability to "back-fill" vouchers cannot be guaranteed.

The Housing Authority values its ongoing partnership with St. John Center, and we look forward to working with you on this endeavor.

Sincerely,

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

Lisa Osanka  
Executive Director



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





## Comments from United Way and LMHA Response

**From:** Samuel Dixius  
**Sent:** Thursday, April 14, 2022 5:00 PM  
**To:** John S. Nevitt <[john.nevitt@metrounitedway.org](mailto:john.nevitt@metrounitedway.org)>  
**Subject:** RE: public comments on LHHA annual plan

Mr. Nevitt,

Thank you for taking the time to provide your feedback and support for the proposed exclusion of up to \$6,000 in income from the YALift! program. LMHA is likewise excited to see the impact the pilot program will have on recipients and also being able to allow participants to maintain their housing assistance as much as possible.

Please feel free to let us know if you have any questions or concerns about anything else in our proposals and we would be happy to address them.

Sincerely,

Sam Dixius

Sam Dixius  
Compliance Manager  
Louisville Metro Housing Authority  
Office: 502-569-6933  
Work Cell: 502-965-8462

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**From:** John S. Nevitt <[john.nevitt@metrounitedway.org](mailto:john.nevitt@metrounitedway.org)>  
**Sent:** Tuesday, April 12, 2022 3:35 PM  
**To:** Samuel Dixius <[Dixius@lmha1.org](mailto:Dixius@lmha1.org)>  
**Subject:** public comments on LHHA annual plan

Mr. Dixius-

Thank you for including in your annual plan a proposal to exclude up to \$6,000 of income for participants in Louisville's guaranteed income pilot program known as YALift! We are excited to observe the impact this pilot will have on recipients who will receive monthly unrestricted payments of \$500 for one year, and protecting their housing benefits is a critically important element.

Cordially,

**John Nevitt** (*he, him, his*)  
Director, Economic Mobility

Metro United Way  
334 E. Broadway | Louisville, KY 40202  
Direct: 502-292-6128



## Comments from Volunteers of America



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

Ms. Lisa Osanka, Executive Director  
Louisville Metro Housing Authority

RE: MTW Annual Plan for FY23 and Need for Project Based Vouchers for Volunteers of America New Supportive Housing Development

Dear Director Osanka:

VOA hereby submits the following comments on the Louisville MHA Annual Plan for FY23.

VOA has been awarded funds from the City of Louisville to build new supportive housing units for people experiencing homelessness that won't be possible without support from LMHA.

Specifically, VOA requests the dedication of 20 program specific referral vouchers for our new development that received an award of \$4.5M from the City of Louisville through a competitive award process. We are working with Beargrass Development, which is an experienced affordable housing developer with a strong track record developing in Louisville.

VOA's supportive housing program will help advance LMHA's stated priorities of:

- Increase residents moving to self-sufficiency
- Improve housing stock

VOA will provide intensive but voluntary services to all tenants in the development and will assist the tenants with a Moving Up strategy, as described in the MTW plan, when the households no longer need the intensive supports.

VOA has significant experience managing supportive housing throughout Louisville, providing case management and supportive services including financial literacy and workforce development.

VOA and Beargrass Development will be developing 80 housing units on a donated piece of land in Germantown, adjacent to VOA's Shelby Street Addiction Recovery Services campus. The units will be a mix of permanent supportive housing and low-income housing, with a common space for group activities and a case manager on site to provide supportive services.

Supportive housing is an evidence-based housing intervention designed for those at highest risk of dying on the streets. It entails rent that is affordable for people with no or extremely low-incomes, and offers intensive home-based services directed by the tenant.

I am happy to discuss the planned development and how we might partner with LMHA. I encourage you to consider this request as we must have support from LMHA to move forward with addressing the urgent need for supportive housing in our community.

Sincerely,

Jennifer Hancock  
President & CEO



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



## LMHA Response to Comments from Volunteers of America



April 15, 2022

Ms. Jennifer Hancock  
Volunteers of America Mid-States  
570 S. 4<sup>th</sup> St., Suite 100  
Louisville, KY 40202

Dear Ms. Hancock,

Thank you for your letter regarding the Louisville Metro Housing Authority's (LMHA) draft FY 2023 Moving to Work Annual Plan.

The Housing Authority appreciates the Volunteers of America Mid-States' commitment to providing supportive housing for those experiencing houselessness, as well as other low-income families in the Louisville area. Thus, we are pleased to provide conditional approval of VOA's request for twenty (20) special referral vouchers to be used at its planned Germantown location pending final approval by the LMHA Board of Commissioners and HUD.

Please note that these are not Project Based Vouchers, as referred to in the reference line of your letter.

Sincerely,

Lisa Osanka  
Executive Director



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



## Comments from Wellspring



Ms. Lisa Osanka, Executive Director  
Louisville Metro Housing Authority

RE: MTW Annual Plan for FY23 and Need for Special Referral Vouchers for Wellspring New Supportive Housing Development

Dear Director Osanka:

Thank you for the opportunity to provide comments on the Louisville MHA Moving to Work Annual Plan for FY23.

I am extremely grateful for the longstanding partnership Wellspring has had with LMHA. That partnership has allowed us to house and support many, many persons with disabling symptoms of serious mental illness (and often mental illness with co-occurring substance use disorders), homelessness, and poverty with nearly all of our clients living well below 30% of the area median income. Our work together with the Special Referral, Olmstead, and Mainstream voucher programs has been immeasurably beneficial to the vulnerable population that Wellspring serves. We talked a few months ago about the likelihood that Wellspring would be awarded funds from the City of Louisville to develop additional supportive housing units and we are also applying to the LAHTF but everything is contingent upon our partnership with LMHA. When we talked previously, Wellspring anticipated the need for an additional 30 vouchers through MTW but I now believe our total need will be closer to 55.

Wellspring's supportive housing program will help advance LMHA's stated priorities of:

- Increase residents moving to self-sufficiency
- Improve housing stock

As you know, Wellspring has a proven track record providing intensive but voluntary services to tenants in supportive housing. We will assist the tenants with a Moving Up strategy, as described in the MTW plan, when households no longer need the intensive supports that we provide.

You know the problems of homelessness better than most in our community as well as the dearth of housing with supports for those with the greatest needs. You know, too that many who remain on our streets have behavioral health problems and that is who serve. I apologize for asking for an increase in our MTW allocation at this late hour but if it is possible, I would be grateful.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Dobbins".

Katharine R. Dobbins, LCSW  
CEO, Wellspring

P.O. Box 1927  
Louisville, KY 40201

[www.WellspringKY.org](http://www.WellspringKY.org)



502.637.4361  
[info@WellspringKY.org](mailto:info@WellspringKY.org)

## Response to Comments from Wellspring



April 19, 2022

Ms. Katharine R. Dobbins  
Wellspring  
P.O. Box 1927  
Louisville, KY 40201

Dear Ms. Dobbins,

Thank you for your letter regarding the Louisville Metro Housing Authority's draft FY 2023 Moving to Work Annual Plan.

We too are grateful for the longstanding partnership that the Housing Authority has had with Wellspring and are pleased to expand this cooperation by providing 55 special referral vouchers to your organization. The draft Annual Plan contemplated a commitment of 30 vouchers, so this will extend our commitment by an additional 25 vouchers. This commitment is conditional on the receipt of final approval by the LMHA Board of Commissioners and HUD.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Osanka".

Lisa Osanka  
Executive Director



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



### Summary of Public Comments & LMHA Responses

The table below includes a summary of the comments received at the Fiscal Year 2023 MTW Plan Public Hearing held on March 29, 2022 via web conference. Where comments are made only at the hearing, LMHA summarized the comment and included the LMHA's response below.

No.	Topic	Comment	LMHA Response
<b>Member of the Public</b>			
1.	Disposition and Relocation	<ul style="list-style-type: none"><li>A member of the public asked what would happen to the residents of the Manslick Road units that are slated for disposition (see Table 3:Planned Public Housing Units to be Removed in FY 2023) .</li></ul>	<ul style="list-style-type: none"><li>LMHA responded that these tenants will be transferred.</li></ul>



## 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> Enter Name and Address of Prime:   <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</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
<b>11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</b>		
<b>Signature:</b> _____  <b>Print Name:</b> _____  <b>Title:</b> _____  <b>Telephone No.:</b> _____ <b>Date:</b> _____		<b>Federal Use Only</b>   Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

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

### Certification of Payments to Influence Federal Transactions

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

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

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)

6/9/2022

Previous edition is obsolete

form HUD 50071 (01/14)



## Appendix E: Anticipated Public Housing Units Capital Projects, Disposition, Demolition

The Louisville Metro Housing Authority (LMHA) anticipates that a number of public housing units will need to stand unoccupied for extended periods in order to accommodate major physical improvements, repairs, or renovation. Also, some units may need to be held vacant in preparation for their disposition or demolition.

This Appendix identifies units that are projected for significant capital improvements, disposition, or demolition. As the need arises, LMHA will request approval to assign the units' relevant Unit Tenant Statuses in HUD's Inventory Management/Public Housing Information Center (IMS/PIC) system to reflect their actual occupancy and utilization. Units receiving status changes for these activities will be characterized as either "Vacant HUD-Approved – Undergoing Modernization" or "Vacant HUD Approved - Demo/Dispo Approved."

	Development Code	Bldg. No.	Unit No.	Unit Address	Proposed Unit Tenant Status	Work to be Completed	Year
	<b>KY001000017 - Fegenbush-Whipps Mill</b>						
1	KY001000017	1904	190062	3627 W. Broadway St. #2	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
2	KY001000017	1904	190064	3627 W. Broadway St. #4	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
3	KY001000017	1907	190069	610 S. 24 <sup>th</sup> Street #1	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement	2022, 2023
4	KY001000017	1907	190070	610 S. 24 <sup>th</sup> Street #2	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement	2022, 2023
5	KY001000017	1907	190071	610 S. 24 <sup>th</sup> Street #3	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement	2022, 2023
6	KY001000017	1912	190085	621 E. St. Catherine Street #5	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
7	KY001000017	1912	190086	621 E. St. Catherine Street #6	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
8	KY001000017	2210	220107	1131 S. 6 <sup>th</sup> Street #1	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
9	KY001000017	2210	220108	1131 S. 6 <sup>th</sup> Street #2	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
10	KY001000017	2210	220109	1131 S. 6 <sup>th</sup> Street #3	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
11	KY001000017	2210	220110	1131 S. 6 <sup>th</sup> Street #4	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
12	KY001000017	2210	220111	1131 S. 6 <sup>th</sup> Street #5	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
13	KY001000017	2210	220112	1131 S. 6 <sup>th</sup> Street #6	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement	2022, 2023
14	KY001000017	2212	220115	2754 Montana Avenue	Undergoing Modernization	Unit reconfiguration, systems replacement	2022, 2023
15	KY001000017	2217	220121	2705 Virginia Avenue #1	Undergoing Modernization	Structural repairs, bath renovation, new cabinetry & finishes	2022, 2023
16	KY001000017	2217	220122	2705 Virginia Avenue #2	Undergoing Modernization	Structural repairs, bath renovation, new cabinetry & finishes	2022, 2023
	<b>KY001000034 - HOPE VI Scattered Sites</b>						

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
1	KY001000034	3416	350215	1638 W. Kentucky St., #1	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
2	KY001000034	3416	340379	1638 W. Kentucky St., #4	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
3	KY001000034	3416	350232	1638 W. Kentucky St., #5	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
4	KY001000034	3416	450305	1638 W. Kentucky St., #7	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
5	KY001000034	3416	450360	1638 W. Kentucky St., #8	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
6	KY001000034	3460	340383	1638 W. Kentucky St., #9	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
7	KY001000034	3460	340204	1638 W. Kentucky St., #10	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
8	KY001000034	3460	350246	1638 W. Kentucky St., #11	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
9	KY001000034	3460	350283	1638 W. Kentucky St., #14	Demo/Dispo Approved	Environmental mediation and unit renovation would	2022, 2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
						be cost prohibitive – disposition proposed	
10	KY001000034	3460	340272	1638 W. Kentucky St., #16	Demo/Dispo Approved	Environmental mediation and unit renovation would be cost prohibitive – disposition proposed	2022, 2023
11	KY001000034	4592	450335	3600 Manslick Road #1	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
12	KY001000034	4592	450336	3600 Manslick Road #2	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
13	KY001000034	4592	450337	3600 Manslick Road #3	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
14	KY001000034	4592	450338	3600 Manslick Road #4	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
15	KY001000034	4593	450339	3602 Manslick Road #1	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
16	KY001000034	4593	450340	3602 Manslick Road #2	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
17	KY001000034	4593	450341	3602 Manslick Road #3	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
18	KY001000034	4593	450342	3602 Manslick Road #4	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
19	KY001000034	4594	450343	3618 Manslick Road #1	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
20	KY001000034	4594	450344	3618 Manslick Road #2	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
21	KY001000034	4594	450345	3618 Manslick Road #3	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
22	KY001000034	4594	450346	3618 Manslick Road #4	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
23	KY001000034	4595	450347	3620 Manslick Road #1	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
24	KY001000034	4595	450348	3620 Manslick Road #2	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
25	KY001000034	4595	450349	3620 Manslick Road #2	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
26	KY001000034	4595	450350	3620 Manslick Road #4	Demo/Dispo Proposed	Excessive repairs needed - disposition proposed	2023
27	KY001000034	3341	334001	8714 Bayberry Place #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
28	KY001000034	3341	334002	8714 Bayberry Place #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and	2023

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						underfunded – disposition proposed	
29	KY001000034	3341	334010	8714 Bayberry Place #6	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
30	KY001000034	3341	334003	8714 Bayberry Place #7	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
31	KY001000034	3342	334004	8716 Bayberry Place #14	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
32	KY001000034	3342	334005	8716 Bayberry Place #19	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
33	KY001000034	3342	334006	8716 Bayberry Place #20	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function	2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
						well, as the regime is often ill-equipped and underfunded – disposition proposed	
34	KY001000034	3343	334007	8716 Bayberry Place #21	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
35	KY001000034	3343	334008	8718 Bayberry Place #25	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
36	KY001000034	3343	334009	8718 Bayberry Place #28	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
37	KY001000034	3413	340201	1488 Bland St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
38	KY001000034	3413	340367	1488 Bland St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
39	KY001000034	3413	340353	1488 Bland St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
40	KY001000034	3543	350384	1518 Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
41	KY001000034	3543	350361	1518 Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
42	KY001000034	3543	350245	1518 Magazine St. #5	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and	2023



	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
						underfunded – disposition proposed	
43	KY001000034	3535	450317	1521 W. Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
44	KY001000034	3535	350230	1521 W. Magazine St. #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
45	KY001000034	3535	350239	1521 W. Magazine St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
46	KY001000034	3535	350354	1521 W. Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
47	KY001000034	3417	350231	1529 W. Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function	2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
						well, as the regime is often ill-equipped and underfunded – disposition proposed	
48	KY001000034	3417	450278	1529 W. Magazine St. #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
49	KY001000034	3417	340205	1529 W. Magazine St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
50	KY001000034	3417	340206	1529 W. Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023
51	KY001000034	4599	450332	2720 Rodman Street	Undergoing Modernization	Unit repairs and replacement of plumbing and HVAC systems	2022, 2023
	<b>KY001000061 - Sheppard Square HOPE VI Replacements</b>						
1	KY001000061	6110	610401	2700 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023

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2	KY001000061	6110	610402	2700 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
3	KY001000061	6110	610403	2700 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
4	KY001000061	6100	610404	2700 Holly Park Drive #5	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
5	KY001000061	6100	610405	2700 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
6	KY001000061	6111	610407	2702 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
7	KY001000061	6111	610408	2702 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
8	KY001000061	6111	610409	2702 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
9	KY001000061	6112	610415	2704 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023

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10	KY001000061	6112	610415	2704 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
11	KY001000061	6113	610420	2706 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
12	KY001000061	6113	610420	2706 Holly Park Drive #5	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
13	KY001000061	6113	610421	2706 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
14	KY001000061	6114	610422	2708 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
15	KY001000061	6114	610425	2708 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
16	KY001000061	6114	610426	2708 Holly Park Drive #5	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
17	KY001000061	6114	610427	2708 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023

	<b>Development Code</b>	<b>Bldg. No.</b>	<b>Unit No.</b>	<b>Unit Address</b>	<b>Proposed Unit Tenant Status</b>	<b>Work to be Completed</b>	<b>Year</b>
18	KY001000061	6115	610428	2710 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
19	KY001000061	6115	610431	2710 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
20	KY001000061	6115	610431	2710 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
21	KY001000061	6115	610433	2710 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
22	KY001000061	6116	610437	2712 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
23	KY001000061	6116	610439	2712 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
24	KY001000061	6117	610440	2714 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
25	KY001000061	6117	610441	2714 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023

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26	KY001000061	6117	610442	2714 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
27	KY001000061	6117	610443	2714 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement	2022, 2023
28	KY001000061	6199	611114	1515 Cypress Street #114	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
29	KY001000061	6199	611115	1515 Cypress Street #115	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
30	KY001000061	6199	611116	1515 Cypress Street #116	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
31	KY001000061	6199	611117	1515 Cypress Street #117	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
32	KY001000061	6199	611118	1515 Cypress Street #118	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
33	KY001000061	6199	611119	1515 Cypress Street #119	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023

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34	KY001000061	6199	611120	1515 Cypress Street #120	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
35	KY001000061	6199	611121	1515 Cypress Street #121	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
36	KY001000061	6199	611122	1515 Cypress Street #122	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
37	KY001000061	6199	611123	1515 Cypress Street #123	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
38	KY001000061	6199	611124	1515 Cypress Street #124	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
39	KY001000061	6199	611125	1515 Cypress Street #125	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
40	KY001000061	6199	611214	1515 Cypress Street #214	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
41	KY001000061	6199	611215	1515 Cypress Street #215	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023

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42	KY001000061	6199	611216	1515 Cypress Street #216	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
43	KY001000061	6199	611217	1515 Cypress Street #217	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
44	KY001000061	6199	611218	1515 Cypress Street #218	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
45	KY001000061	6199	611219	1515 Cypress Street #219	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
46	KY001000061	6199	611220	1515 Cypress Street #220	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
47	KY001000061	6199	611221	1515 Cypress Street #221	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
48	KY001000061	6199	611222	1515 Cypress Street #222	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
49	KY001000061	6199	611223	1515 Cypress Street #223	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023



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50	KY001000061	6199	611224	1515 Cypress Street #224	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
51	KY001000061	6199	611225	1515 Cypress Street #225	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement	2022, 2023
52	KY001000061	5602	560381	1491 Bland St. #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed	2023

It should be noted that during the course of LMHA's operations, a unit or multiple units may require extensive capital investment and physical work due to circumstances such as fire or storm damage, extraordinary wear and tear, identification of unforeseen hazards or damage, and damage resulting from criminal activities. In such instances, LMHA may opt to add these units to those identified in this Appendix. As the need arises, LMHA will request approval to reassign the units' Unit Tenant Statuses in HUD's IMS/PIC system.