

Keene Housing Authority

Moving to Work Demonstration Program

Annual Plan



2009

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KEENE HOUSING AUTHORITY MOVING TO WORK Annual Plan 2009

MESSAGE FROM P.C. HIEBERT, CEO

The Keene Housing Authority is pleased to present its plan for the year beginning January 1, 2009. Under the flexibility granted under the HUD Moving to Work Demonstration, the SPECTRUM Housing Program of the Keene Housing Authority has been in operation for 10 years, since 1999, and has resulted in great improvements for our housing and our residents and program participants. This year there is a major change in the way we operate that we have been planning for several years:

- In accordance with the MTW Plan for 2008, the KHA has received approval for the complete Disposition of its Public Housing units. This does not mean that the KHA is getting rid of units, but merely changing the way they are funded, in a dramatically positive manner. The KHA is making a considerable investment in the properties, and has received an allocation of Section 8 Vouchers to fund ongoing operating expenses. In addition, with creative financing through issuance of a bond, the KHA will be able to invest over \$5,000,000 into these properties in the next 2 years to rehabilitate and improve them. This will stabilize these units as affordable to our residents for the foreseeable future.
- Our goal is to have the Public Housing operated by the KHA be the equivalent of market based units, and to have them funded adequately to allow them to assist the low and moderate income residents that are our mission to serve.

As a result of this change, the KHA will not have a Public Housing program, but will have a MTW program consisting of a greatly enlarged Section 8 subsidy program. Our commitment to services for all of our residents will continue, and the condition of our properties and our ability to assist our customers will be greater than ever.

The MTW program allows us to deal with a lot of issues, and we will continue to utilize its flexibility to make our housing and housing programs the best ones possible for our participants and for the KHA.

Sincerely,

P. Curtis Hiebert, CEO

Section I. Introduction

A. The Keene Housing Authority

Keene Housing Authority Mission

The mission of the Keene Housing Authority is, directly or in collaboration with others, to provide and/or advocate for:

- *Decent, safe and affordable housing for individuals, families, elderly and disabled persons of low to moderate income within the Monadnock region;*

And; to provide and/or advocate for

- *Any and all services and programs that will assist in improving the social and economic welfare of such individuals and families.*

The Keene Housing Authority was created by resolution of the City Council for the city of Keene on July 15, 1965 in accordance with Section 4 of Chapter 203, New Hampshire Revised Statutes Annotated. The stated mission of the authority was filling the need for “safe, sanitary dwelling accommodations for the elderly and persons of low-income in Keene.” Pursuant to this resolution the Mayor of Keene, in accordance with NHRSA 203:5, appointed five persons as Commissioners of the Keene Housing Authority, and these appointments have been made regularly in accordance with the law, through and including the present time. The Authority, as a duly created municipal agency of the city, derives extensive powers from RSA 203.8. Among these powers is the authority to:

- Acquire, lease, manage, maintain or operate housing projects
- Provide for the construction, reconstruction, improvement, and extension of housing projects or any part thereof.
- Lease or rent any dwellings, houses, land, or buildings in any housing project.
- Establish and revise the rents and other charges for use of the property.
- Own, hold, and improve real or personal property.
- Purchase, lease, obtain options upon, and acquire by gift any real or personal property.
- Sell, lease, exchange, transfer or dispose of any real or personal property.

The Authority is governed by a five person Board of Commissioners appointed by the Mayor of the city of Keene. A list of the Board of Commissioners is attached. The Board is responsible for the hiring and supervision of the Chief Executive Officer, who is responsible for the day-to-day operation of the agency. The Keene Housing Authority has a staff of approximately 40.

Organization

Keene Housing Authority is a small agency that operates a full diversity of housing programs from traditional public housing (soon to be disposed) to Low Income Housing Tax Credit programs, Rural Development and Community Development Block Grant program. The diverse portfolio of housing and services enables the agency to fulfill its goal in providing affordable and quality housing to the Keene and surrounding communities now and into the future. As a small agency it is challenging to administer the complexity of the programs. Keene does not have the luxury of creating highly

specialized positions or departments that focus on compliance, data management and policy development. For instance, program staff must administer the program to clients, submit to PIC, use EIV and conduct annual recertifications and interims to name a few of the responsibilities delegated to a single position. The flexibilities granted under MTW help alleviate some, not all of the administrative requirements so staff can focus more energy working with direct housing needs of families.

Keene's organizational structure consists of three major departments as well as several administrative positions. The three major departments include Finance, Facilities and Asset Management and Housing and Services. Administrative positions include the Community Development and Block Grant program and the newly created Manager of Policy and Program Development.

Keene Facts

Keene, New Hampshire is located in Cheshire County in the southwest corner of the state and is the busy hub for several local and interstate roads and highways. At an elevation of 486 feet above sea level, it covers a land area of 37.3 square miles. Population in the year 2000 was 22,563. Industries providing employment include educational, health and social services (24%), retail trade (16.3%) and manufacturing (15.9%). The nearest cities with large populations include Nashua (57 miles), Boston (93 miles) and New York (191 miles). In addition to typical municipal services provided by the city the area is served by the Cheshire Medical Center, Keene State College, Antioch New England Graduate School, Franklin Pierce College and the Keene Public Library and the Dillant Hopkins Airport. Keene is also well known in the region for the quality of service programs available to families with low incomes.

B. Moving To Work Program Demonstration Summary

Keene was selected as part of the initial competitive process to join the demonstration by responding to HUD's request for proposals by HUD in 1996. The MTW agreement was executed in 1999 and included all of the agency's public housing stock and Section 8 allocation with the exception of the Mainstream Voucher program. Keene began implementing the program on October 1, 1999 for all Public Housing residents. The Section 8 program was implemented in 2000.

The three statutory objectives of the Moving to Work demonstration program are to:

1. Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2. Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in on the job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. Increase housing choices for low-income families.

In accordance with those objectives, the primary goals of **Keene's Spectrum MTW Demonstration Program** include:

- Increase share of residents making progress toward self-sufficiency
- Improve the quality of assisted housing stock
- Provide a full SPECTRUM of housing options for applicants
- Increase homeownership among residents
- Enhance Keene Housing Authority's capacity to plan and deliver effective programs
- Increase resident satisfaction with their housing and with Keene Housing Authority programs

Summary MTW Activities and Initiatives

Keene's current plans and activities are to continue with its successful MTW initiatives while embarking on a major goal, the Keene Affordable Housing Project, to ensure the preservation and financial viability of its former public housing inventory. New and ongoing strategies include the following:

- Utilize MTW flexibility to **increase housing options and services** through collaborative projects, partnerships and development with local, regional and national institutions.
- Initiate the **Keene Affordable Housing Project** to **rehabilitate and preserve** the former public housing portfolio.
- Provide subsidy reform initiatives, through the **Section 8 Housing Assistance Coupon program**, to provide incentives for working families to achieve and maintain employment.
- Operate the **Safety Net Program** to provide temporary relief for people who experience an increase in rent burden due to a qualified decrease in income or increase in expenses.
- Provide supportive services such as the **Resident Self-Reliance Program, Congregate Housing Program and Youth Services** to **increase success rates of tenants and participants**.
- **Diversify funding sources** to ensure the long term financial viability of all housing and service programs, including MTW initiatives, operated by the Keene Housing Authority.
- **Maximize efficiency** of operations and **streamline service delivery** through MTW initiatives such as self-certifications and standard deductions.
- Engage in regular **organizational and staff development initiatives** to accommodate the shifting paradigm of how we serve participants.

C. 2009 Strategic Goals

Spectrum Housing Choices

It is a goal of Keene's, beyond the MTW demonstration, to expand housing options. Combining the flexibility of the MTW demonstration program with Keene's various other housing programs, housing choices have dramatically expanded for Monadnock region residents in the past 10 years. Housing opportunities have been expanded under the MTW program due to the following strategies:

- The 40% income exemption allows for increased housing options for participants in the Section 8 program.
- Preferences for Section 8 assistance.
- Income eligibility up to 80% achieves a greater income mix of families.
- Collaborations with local shelter programs and the creation of the Heading for Home Homeownership program increase the spectrum of housing options
- Development of LIHTC programs has provided additional housing choices since 2006 for applicants on Keene Housing Authority waiting lists.
- Site based waiting list system for all KHA programs.

Within the MTW Section 8 program, Keene Housing Authority created several preferences and special programs to allow participants more housing options. The Shelter HAC program provides assistance

for households living in the shelters. Once the participant graduates from the program, they are given a preference for our Section 8 HAC so they can find housing on the private market.

There are preferences for applicants who are living in a KHA owned or managed property that do not receive subsidy. This provides affordability for tenants in non-public housing units and greater housing options.

Preferences are also in place for current tenants who are ready for homeownership so we may issue them a homeownership voucher from our existing MTW Section 8 allocation.

The number of affordable housing units in Keene's portfolio has increased by 131 over the past six years due to development and acquisition of 5 developments. Keene's Section 8 voucher utilization rates have increased over the 359 initially allocated at the start of the demonstration averaging around 400 per year. The Section 8 assistance has been expanded to cover the full spectrum of housing needs in Keene; this includes homeless households living in the shelter to individuals purchasing a home using the voucher.

After several years of developing and acquiring affordable housing, Keene's focus is on preserving its older existing housing stock and their financial viability. The majority of these efforts over the next two years will be concentrated on the Keene Affordable Housing Project. This projects involves completing the disposition of all 228 units of public housing and refinancing the rehabilitation of the units with funding generated through the Low Income Housing Tax Credit and Bond programs. The disposition is scheduled for the end of 2008 with rehabilitation activities scheduled to follow in 2009.

Keene's strategic focus for the next two years includes:

- Improve the quality and financial viability of existing housing.
- Develop Board and staff succession training and planning.
- Develop comprehensive public relations and marketing plans to expand awareness of affordable housing issues and options in the region.
- Explore housing needs of special populations in Keene and Cheshire county.
- Increase self-sufficiency of residents and section 8 participants.

Deconcentration Policy

The Keene Housing Authority monitors the characteristics of households served to make sure there isn't a large concentration of incomes in a specific geographic area. The Keene Housing Authority, after analyzing Census data from the City of Keene, has applied that analysis to the public housing developments owned and operated by the KHA. Due to the fact that there is but a single census tract for the City of Keene, and due to the small size of the KHA public housing family developments, (each of which is less than 50 units), the Board of Commissioners for the Keene Housing Authority determines that there is no need for a Deconcentration Plan for KHA operations.

Section II. General Housing Authority Operating Information

A. Housing Portfolio

The Keene Housing Authority owns and manages 522 units of housing, 228 of which are public housing. All of Keene's public housing units have been approved for disposition by HUD and the disposition was scheduled to occur by the end of 2008 at the first publication of this plan. Since October, the date of disposition has been delayed until 2009. As a result, information on public housing leasing and waiting lists isn't included as part of the plan for 2009.

Public Housing Inventory (fig. 1)

Public Housing	Units	Type	Bedrooms	Contract Number
Harper Acres	112	Elderly & Disabled	49-0BR, 55-1BR, 8-2BR	NH36-P010-001 & 002
Bennett Block	14	Elderly & Disabled	1-0BR,12-1BR,1-2BR	NH36-P010-009
Forest View	38	Family	12-2BR, 26-3BR	NH36-P010-003
North & Gilsum	29	Family	23-3BR & 6- 4BR	NH36-P010-003
32 Water St.	2	Family		NH36-P010-005
17-19 Roxbury Ct	4	Family/Elderly	4-1BR	NH36-P010-005
440 Main St. *	2	Family	2-4BR	NH36-P010-005
64 Spring St. *	2	Family	2-3BR	NH36-P010-005
69 Elm St. *	2	Family	2-2BR	NH36-P010-005
537-539 West St.	4	Family	4-2BR	NH36-P010-005
51 Forest St. *	3	Family	1-1BR, 2-3BR	NH36-P010-006
309 Water St.	3	Family	3-2BR	NH36-P010-006
390 Water St. *	2	Family	1-1BR & 1-4BR	NH36-P010-006
Farmstead Commons, #54,#59, * #69 *	3	Family	3- 2 BR	NH36-P010-009
45 Damon Court	6	Family	2-2BR, 4-3BR	NH36-P010-010
9 Spruce St. *	2	Family	2-3BR	NH36-P010-010
Total Public Housing Units	228	(* indicates unit will be sold as part of disposition.)		

Planned Capital Expenditures as part of the Keene Affordable Housing Project

The large developments were constructed between 1965 and the early 1970's and require a fair amount of rehabilitation. Current capital funds and reserves are not adequate to fund the necessary capital repairs therefore prompting the refinancing activities. Rehabilitation activities will vary from site to site. Approximately 5.9 million dollars is estimated for the rehabilitation of the developments. Market volatility may have an effect on the actual equity raised for the project and the actual scope of work will be refined as the project progresses. Some of the major work at the 4 main developments will include:

- New kitchens and bathrooms
- Energy efficient systems and fixtures
- Accessibility

- Siding
- Window replacement
- Flooring
- Heat and duct work

At Harper Acres a percentage of the small efficiency units will be enlarged to add on a bedroom by adding on to the outside of the building. The efficiency units which are barely large enough to fit a queen size bed are very difficult to market and lease-up.

Planned Rehabilitation Activities

Description	10-1	10-2	10-3	10-9	10-10
	Harper Acres	109 Ashuelot St	Harmony North & Gilsum	Bennett Block	Damon Ct.
Re-shingle Roofs	X	X			X
Replace Hot Water Tanks			X		
Replace Ranges	X	X	X		X
Replace Windows	X	X	X		X
Replace Siding	X	X	X		X
Seal Exterior	X	X	X		X
Replace Kitchen Cabinets	X	X	X		X
Replace Countertops	X	X	X		X
Replace Sinks	X	X	X		X
Replace Range Hoods	X	X	X		X
Replace Bath Vanities	X	X	X		X
Replace Bath Accessories	X	X	X		X
Replace Tub Surrounds	X	X	X		X
Replace Toilets	X	X	X		X
Replace Interior Doors	X	X	X		X
Paint Unit Interior	X	X	X	X	X
New Flooring	X	X	X	X	X
Replace Bath Vents	X	X	X		X
Replace heat	X	X	X	X	X
Replace Lights	X	X	X	X	X
Install Vinyl Stair Treads	X	X	X	X	X
Landscaping	X	X	X	X	X
Convert 32 Efficiencies	X			X	
Elevator Upgrade				X	

Changes in Housing Stock

Fifteen of the public housing scattered sites units will be placed on the market for sale in the fall of 2008. The remaining units will be owned by the Keene Affordable Housing Association Limited Partnership and refinanced through the Low Income Housing Tax Credit program to fund rehabilitation activities for the properties.

Other KHA Owned or Managed Housing Inventory

The remaining properties owned by Keene Housing Authority are governed by the IRS's Low Income Housing Tax Credit program (LIHTC), HUD's Multifamily program, CDBG, Rural Development, Home and other special programs. Keene also owns and manages approximately 28 commercial spaces disbursed among several different properties in Keene. Most of these spaces are rented to local non-profit agencies.

Keene Housing Authority also provides technical assistance and support to other small non-profit housing agencies. Such agencies include Cheshire Homes and Cheshire Housing Trust also operating in Keene and the Monadnock region.

Property	Location	Number of Units	Housing Type	Other Financing
HUD Multifamily Section 8				
Meadow Road	Keene, NH	18	2 and 3 bedroom townhouse units	HUD Multifamily Section 8 Project Based
Central Square Terrace	Keene, NH	90	Senior and disabled high rise w/ elevator	HUD Multifamily Section 8 Project Based
Wedgewood Duplexes	Winchester, NH	30	2 and 3 bedroom duplexes	HUD Multifamily Section 8 Project Based
Low Income Housing Tax Credit Program (LIHTC)				
Riverbend	West Swanzey, NH	24	2 and 3 bedroom townhouse units	Home
Evergreen Knoll	West Swanzey, NH	32	2 and 3 bedroom townhouses units	Home Rural Development
Stone Arch Senior Housing	Keene, NH	33	Senior high rise w/elevator 1 and 2 bedrooms	Home CDBG
Stone Arch Family Housing	Keene, NH	24	Family 2 and 3 bedroom townhouse units	CDBG

Special Programs				
Chamberlain Block	Keene, NH	12	High rise 0 and 1 bedrooms	CDBG
Cottage Street	Keene, NH	3	3 2 and 3 bedroom units	State Agency Financed and CDBG
Total Units		266		

Moving to Work Housing Choice Vouchers

As part of the Moving to Work Demonstration program, Keene created the Housing Assistance Coupon program (HAC) in 2001 as an alternative to the regular Housing Choice Voucher program (HCV). All of Keene's Section 8 assistance, with the exception of the 50 mainstream vouchers, is administered under the MTW program. Keene's Section 8 Voucher allocation includes 359 Section 8 vouchers and 50 Mainstream vouchers. In June of 2008, Keene applied for and was awarded 228 replacement vouchers to support the public housing units after the disposition has been completed. increasing Keene's MTW Section 8 voucher allocation to 587.

Some of the assistance is still issued as HCVs rather than HACs for two reasons. Keene continues to honor HCV contracts with Landlords signed before the implementation of the HAC program. Existing tenants will be offered the option to convert their HCV to a HAC each year at their annual recertification. Keene also administered HCVs to Section 8 recipients opting to move into KHA's LIHTC properties to avoid confusion in regulatory compliance between the two programs.

Project Base Section 8

Out of Keene's 587 allocated vouchers, up to 50% will be project based starting approximately in April 2009 in our public housing units scheduled for disposition (see **fig. 1** for list of projects that will receive project base vouchers). All of these units are currently occupied by existing public housing tenants who will have the option to remain in their units and receive the project based assistance after the disposition providing they are eligible at time of implementation. After these tenants have been offered their one time opportunity to move with their voucher, vouchers will be project based in the units. This will provide continued subsidy for existing and future tenants when the property is operated as a LIHTC development. These vouchers will be administered as part of the MTW Section 8 allocation called the Housing Assistance Coupon program. The plan to project base the vouchers up to 50% of its total voucher allocation in the KHA owned and managed properties was included and approved as part of our 2008 MTW annual plan. Public hearings were held on several occasions from January through July of 2007. There were no objections or comments on this part of the 2008 MTW Plan.

B. Occupancy and Lease-up Information

Projected lease-ups for both MTW Section 8 and Mainstream voucher programs in 2009 are as follows:

Moving to Work: 587

Mainstream: 50

The Moving to Work projection includes the additional 228 replacement vouchers which will be fully utilized as part of the disposition. Keene has a Section 8 waiting list that is approximately 5 years long.

We expect the length to increase throughout 2009 due to increased demand for assistance, higher rents and utility costs and full utilization of voucher funds with little projected turnover. Our voucher participants are successful in finding housing in the Keene community as well as within LIHTC units owned and managed by the Keene Housing Authority.

C. Waiting List Information

Keene operates two waiting lists; one for the MTW Housing Choice Voucher’s, (Housing Assistance Coupon), and another for the Mainstream program. Applicants have the option of applying for both of the programs. Keene plans to convert the existing public housing waiting list to a Section 8 project based waiting list separate from both the Mainstream and MTW Housing Choice Vouchers waiting lists. Applicants on the list will retain their current application date.

Current and Projected Length of Section 8 Waiting Lists

Program	Current Households	Current Length	Projected Length
Mainstream	119	5 yrs	6yrs
MTW HAC vouchers	338	5 yrs	6yrs
Project Base Vouchers List (former PHA list)	335	8 months to 2 yrs	1.5 to 2.5 yrs

Keene is not considering closing any of the waiting lists at this time. Waiting lists will continue to be purged at least annually. The next purge is scheduled for March 2009. The waiting lists were last purged in March of 2008.

Section III. Long-Term Vision for Keene’s Moving to Work Program

2009 will mark Keene’s ten year anniversary as a Moving to Work participant. The Moving to Work program was developed during a substantially different political, economic and social climate. Since the start of MTW we, as a nation, have become engaged in war. We have seen unemployment rates soar as job growth declines. We have seen the energy crisis explode causing a financial disaster for both the families we serve and properties we manage. Now, Keene, as many other regions in the country are witnessing unprecedented increases in the cost of living which makes it even more difficult for families to meet their basic needs for food, shelter and health care. The flexibilities granted by the MTW program will become increasing important as we need to adjust our policies to rapidly changing economics on both a national and local level. Strategies that succeeded at the beginning of the demonstration may now prove to be ineffective in achieving the goals of the demonstration. The goal itself of moving to work may become secondary to the goal of simply finding and maintaining affordable housing in a time of unprecedented layoffs and recession.

In 2009, Keene will be completing a full scale strategic planning and analysis of its MTW initiatives guided by the following principles:

- Affordability for residents
- Permanency and availability of housing

- Flexibility to meet local and changing needs
- Easily accessed and efficiently delivered services minimizing government regulation
- Emphasis on resident self-sufficiency and independent living
- Collaborative service delivery
- Green and energy efficient housing

Section IV. Proposed MTW Activities

While Keene is not proposing any new initiatives in 2009, it is seeking to make modifications to existing activities to support the Keene Affordable Housing Project and changes in the local rental market.

A. Proposed Change to Existing Initiative: Housing Assistance Coupon Subsidy

***Statutory Objective(s):** Reduce cost and achieve greater cost effectiveness in Federal expenditures; Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in on the job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and*

In response to increased utilities costs, many landlords have stopped including utilities in rent shifting the increase in costs to residents. Rents have increased while wages have stagnated. In a review of rent burdens, 20 out of the 70 households currently have a rent burden of over 30%. Keene would like to prevent this number from increasing.

Subsidy determination, for participants who do not qualify for an income based subsidy, is based on the number of years a participant has been in the program and eligibility for occupancy standards. The first year subsidy is calculated by subtracting 20% of a household's gross income from the Voucher Payment Standard (VPS). The second and third step subsidies are based on 55% and 35% of the VPS. The subsidies are adjusted annually with adoption of the payment standards. What has not and does not fluctuate according to existing policy is the percentage of the VPS used to determine step subsidies.

Keene is proposing to allow the percentages of each step to be adjusted annually in conjunction with adoption of the VPS. Like the VPS, it would be adopted at the tenant's next scheduled annual recertification. It is important to note this is not a new initiative but rather a modification to an existing initiative. Keene is proposing to increase the step subsidies to the following percentages starting January 1, 2009:

1 st Step (1 st year)	2 nd Step (2 nd year)	3 rd Step (4 th year)	Bedroom Size
Lower of Welfare rent or VPS - 20% of Gross Income	65% VPS	45%	1 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	65% VPS	45%	2 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	65% VPS	45%	3 Bedroom

Impact

Reviewing, and as necessary, adjusting not only the subsidies but the percentages on which they are based, would allow us to minimize rent burdens and maximize subsidy use based on changes in the local rental market and economy. Changing the step subsidy percentages will provide relief to tenants and allow them to successfully maintain their housing. This would, however, reduce the number of people we are able to serve as it would utilize more HAP funds. Keene is over utilized averaging around 400 vouchers, higher than its allocation of 359.

Baseline and Measures

Keene will continue to evaluate rent burden and evaluate the impact of its rent reform on utilization rates and funding levels. HUD also conducted a study of housing costs titled Trends in Housing Costs: 1985-2005 and the 30 % of Income Standard. The report touches on an important topic relevant to our assumptions and standards of calculations of rent burden. The study doesn't provide a method to calculate a tenant's rent burden relevant to their need to pay for housing and other basic costs of living. Keene will continue to examine the impact of its subsidy policies on tenants. Keene will review the percentage of income paid toward rent, including utilities, and compare to other basic living costs, as data is available, such as food, child care, health care, and transportation.

Data Collection

Keene collects data such as gross annual income, private market rents, utilities and rent burdens of tenants. The information is collected on case management forms and entered into several data bases. Keene uses New Hampshire Housing Finance Authority's annual utility study conducted by New Hampshire Housing Finance Authority to determine its utility allowances. Keene will also review other studies which provide cost estimates for other basic needs such as food, transportation etc.

Authorizations: Attachment C. Section D.2 Rent Policies and Term Limits.

The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

B. Proposed Initiative: Project Based Vouchers

Statutory Objective(s): Increase housing choices for low-income families.

The plan to project base the vouchers up to 50% of its total voucher allocation in the KHA owned and managed properties was included and approved as part of our 2008 MTW Annual Plan. Public hearings were held on several occasions from January through July of 2007. There were no objections or comments on this part of the 2008 MTW Plan. Keene will project base up to 50% of its Moving to Work Voucher allocation in Keene Housing Authority owned and managed properties as authorized in the Moving to Work agreement, Section D.7 of Attachment C. The HAP contract is scheduled to be

executed with the owner, Keene Affordable Housing LP, for the 213 Keene Affordable Housing units sometime in late 2008 early 2009.

Keene's policies for tenant based vouchers contained in the Moving to Work Administrative Plan also apply to the PBV program and its participants unless otherwise noted or specifically prohibited by PBV regulations not waived under the authority of the Moving to Work demonstration program.

Project base voucher units will be subject to HQS standards. The owner will be permitted to self-certify that the units meet HQS as authorized in the Moving to Work agreement attachment C Section D.5. for both initial and subsequent annual inspection requirements. The Section 8 program staff will conduct quality control inspections on the PBV units as described in the MTW Administrative Plan.

Separate waiting lists will be established and managed for individual projects receiving Project Based Vouchers. Additionally, the lists will be merged with the owner waiting lists for the projects as follows:

- Harper Acres
- Bennett Block
- Harmony Lane
- North/Gilusm
- Scattered Sites

Preferences will be applied for approved Congregate program applicants at Harper Acres and Bennett Block developments. Current eligibility for Harper Acres and Bennett Block are limited to elderly, disabled or near elderly households. After the disposition occurs, the developments would be subject to the Housing for Older Persons Act. Based on current ratios of elderly to younger disabled households in these developments, Keene would not be able to designate either development as elderly housing. Keene will reexamine the status of each of the developments after transfer of ownership to determine if any changes in the tenant population have occurred that would permit the developments to be designated as elderly.

Applicants for the properties must meet tenant selection criteria as established by the owner and Section 8 program as outlined in the MTW administrative plan. Selection of tenants must be approved by both the owner and Section 8 program designated staff.

Impact

Project basing the vouchers will continue to provide a subsidy source for tenants occupying Keene's Public Housing units after the disposition and for future tenants.

Baseline and Measures

Keene will track the number of housing units that use project base vouchers. Keene currently does not have any project base voucher so the baseline for number of units would be zero. Keene's goal is to project base 213 vouchers in 2009.

Data Collection

Keene operates both property management and Section 8 software which tracks units and households subsidized as well as tenant rent and income information.

Authorizations: Attachment C. Section D.7 Establishment of an Agency MTW Section 8 Project-Based Program. The Agency is authorized to project-base Section 8 assistance at properties owned

directly or indirectly by the Agency that are not public housing, subject to HUD's subsidy layering. If the Agency chooses to project-base Section 8 assistance at such properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. This authorization waives certain provisions of Section 8(o)(13)(B and D0 of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan.

C. Proposed Change to Existing Initiative: Permit Portability for Cases of Reasonable Accommodation and Domestic Violence

Portability

Portability is currently restricted to cases of reasonable accommodation or other good cause. In its 2008 plan, Keene restricted portability to cases of reasonable accommodation. Keene is proposing to alter its portability policy to permit it in cases of domestic violence as well as reasonable accommodation. Keene will also evaluate on a monthly basis whether or not it will absorb ports from other PHA's based on funding levels.

Impact

Under its original MTW Agreement cases of portability were restricted only to cases of reasonable accommodation. Expanding it to cases of domestic violence allows compliance with VAWA and provides flexibility for victims of domestic violence.

Baselines and Measures

Keene will track the number of ports it approves and absorbs and the impact on funding levels and utilization rates. It will also track the number of requests it receives and the reasons for the request to evaluate if the port policy should be altered. Keene will start 2009 with a baseline of zero.

Data Collection

Requests for ports will be tracked by staff in a spreadsheet. Ports are entered into the Section 8 software program as they are processed and reports are generated on a monthly basis to evaluate funding and utilization rates.

Authorizations: Attachment C. Section D.1.g. Operational Policies and Procedures.

The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. This authorization waives certain provisions of Section 8(p) of the 1937 Act and 24 C.F.R 983.53-54 and 982 Subparts H and M as necessary to implement the Agency's Annual MTW Plan.

D. Proposed Change to Existing Initiative: Heading for Home Homeownership Program

Statutory Objective(s): Increase housing choices for low-income families.

The amount of the monthly assistance payment is based on three factors: the voucher payment standard (VPS) for which the household is eligible; monthly homeownership expenses; and, the household's income. KHA pays the lower of either the VPS minus the total family contribution (TF)

or the household's monthly homeownership expenses minus the TFC. The household will pay the difference.

Keene established a flat rate subsidy payment for households in Resident Self-Reliance and Housing Assistance Coupon program (HAC) that would not receive subsidy based on the standard subsidy formula described above. A participant household in the Section 8 HAC program may receive flat rate subsidy if it is determined that the household would receive zero (0) assistance or less than the flat rate assistance, but meets all other eligibility criteria at the date of homeownership application. The flat rate is 50% of the applicable third step in the Spectrum HAC Program. The flat rate assistance will continue until the family's annual recertification determines that the family's gross income exceeds 140% of the area median income for the family's size.

Keene is proposing to change the interim policy for families receiving flat rate assistance to permit interims when a household's income changes. Interims are not permitted for households receiving flat rate assistance in the current Homeownership Administrative Plan. A family may request an interim if their household income changes according to the interim policies outlined in the MTW Administrative Plan for income based households. Households in the homeownership program would also be eligible in cases of hardship for the Safety Net program.

Impact

Keene's goal is to prevent homeownership families from going into foreclosure that received the flat rate subsidy but had a change in income and could no longer afford the mortgage payment. The ability to conduct an interim will help families who may have lost their job continue to pay their mortgage and remain homeowners. It also preserves their housing until the family is able to reestablish their income.

Baseline and Measure

Keene will track the number of families in the homeownership program, their level of assistance and percent of income paid toward housing expenses to analyze their success rates. Keene has also conducted a survey and will continue the survey annually to determine obstacles families are experiencing in maintaining homeownership. In response to the surveys, Keene has coordinated post homeownership counseling with the local HUD approved counseling agency, Cheshire Housing Trust. Keene will also track the number of failures, if any, and reasons for the failed homeownership cases.

Data Collection

Keene maintains data on homeownership participants in its Section 8 database as well as maintains surveys results in participant's files.

Authorizations: Attachment C. Section D.8 a. Homeownership Program

The agency is authorized to establish reasonable Section 8 homeownership programs that are not limited by the existing Section 8 homeownership requirements. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518.

E. Initiative: Resident Self-Reliance Program

***Statutory Objective:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in on the job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient;*

Keene is proposing to alter its policy for non-compliance with the Resident Self-Reliance Program. Current policy requires termination of assistance for an RSR HAC participant household for failure to comply with the terms and conditions noted in the Resident Self-Reliance program contract.

Keene is proposing to reduce subsidy to the third step level, rather than permanently terminate assistance, for participants who are not in compliance with the RSR program. The following outlines the proposed policies and procedures for non-compliance with RSR contract obligations.

To remain in compliance with the RSR program, participants must engage in the following activities as outlined in their RSR Contract:

- Complete skill development activities
- Participate in quarterly goal meetings
- Make reasonable progress toward established goals
- Create and maintain a financial plan

The Resident Services Coordinator assesses compliance on a quarterly basis. If it is determined a participant household is in non-compliance by the Resident Services Coordinator, the household will be notified in writing of their compliance breach with the RSR contract and program requirements. The letter will note the required activities the participant has failed to comply with and the actions the participant must complete within a specified time frame to become in compliance and prevent their subsidy from being reduced.

Impact

Preserving a level of subsidy for participant households rather than terminating their housing assistance provides continued support for families to maintain their housing. However, the shallow subsidy is substantial enough to encourage full compliance with the RSR program to maintain their subsidy. This strategy would also help maintain relationships with landlords who have expressed concerns about the affects of terminating subsidy on its tenants.

Baseline and Measures

Keene will track reasons participants leave the program. Different circumstances such as unusual increase in utility costs, could affect rates of people leaving the program independent of RSR program requirements. Keene will also tracks subsidy terminations that occur for non-payment of rent in connection with the reduced subsidy as a penalty for non-compliance with the RSR program.

Data Collection

Keene maintains and collects data on participants as they exit the program in an access database in addition to its Section 8 software. Keene conducts exit interviews with participant households, when they are willing, to collect data such as their reasons for leaving the program and their new housing. If participants are not willing to participate in the exit interview we use the last reported information on the household.

Authorizations: Attachment C. Section E. Authorizations Related to Family Self Sufficiency.

The Agency is authorized to operate any of its existing self-sufficiency and training programs, including its Family Self-Sufficiency (FSS) Program and any successor programs exempt from certain HUD program requirements. These may include those requirements governing size or participation, including whether to establish escrow accounts and other rent incentives and whether to establish mandatory

self-sufficiency participation requirements. This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R. 984, as necessary to implement the Agency's Annual MTW plan.

Section V. Ongoing MTW Activities

A. Initiative: Housing Assistance Coupon Program (HAC) Stepped Subsidies

Statutory Objective: Reduce cost and achieve greater cost effectiveness in Federal expenditures; Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in on the job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

Description

The Step Subsidy method works similar to the Public Housing Step Rent method. As in Public Housing, elderly and disabled households are allowed to choose the subsidy calculation. All families that do not have an elderly or disabled head of household are required to participate in the stepped subsidy program. The two main differences include a subsidy that is reduced over a five year period and first year subsidy calculations. The first year's tenant portion of rent is determined by subtracting 20% of gross income (or welfare rent) from the VPS. There is a minimum rent of \$50.

If a family's subsidy would be less than the 2nd step but more than the 3rd step, the subsidy would begin at the 2nd step (55% of the VPS) for three years and drop down to the 3rd step (35% of the VPS) for the remaining two years. If the participating family's subsidy would be less than the 3rd step, the subsidy would begin at the 3rd step and remain at that step for the full five years.

Utility rebates are not paid as part of the program as a minimum rent has been established.

Housing Assistance Coupon Program Subsidies Effective 10/1/2006 through 2007

1 st Step (1 st year)	2 nd Step (2 nd year)	3 rd Step (4 th year)	Bedroom Size
Lower of Welfare rent or VPS - 20% of Gross Income	\$400	\$250	1 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	\$500	\$320	2 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	\$600	\$380	3 Bedroom

Keene Housing Authority provides the households with a rental subsidy to assist them in paying their monthly rent in full. The subsidy is directly deposited into the family's bank account on the 1st of the month. In the case of elderly and disabled households, they may choose to receive the subsidy directly

or have it paid to the landlord as in traditional Section 8 programs. The family is then responsible for paying their rent in full and on time.

The payment process is explained to landlords in the Landlord Handbook and upon entry into the program. Landlords are sent letters detailing the participant's obligation for paying their rent. In addition, the letter states that if the tenant does not pay the contract rent in full by the fifth of month, then the landlord should contact Keene Housing Authority and Keene Housing Authority will contact the tenant about payment. If a tenant is late with rent payments, landlords may request that the subsidy be paid directly to the landlord. Keene Housing Authority anticipates that no more than 10% of the participants will fall into this category.

Keene Housing Authority works with our participants to resolve issues of late payments or non-payment of rent. Initially, some families do not have bank accounts and are required to come into the office to pick up their checks on the first of the month. The option of providing the rental assistance subsidy to the participant is also given to the elderly and individuals with disabilities.

Impact

Keene has been operating HAC Step Rent program for 9 years. As previous reports and data have demonstrated, it has provided incentives for families to move to work. The step subsidy can be very beneficial when families are working because their subsidy is not reduced when their income increases. Accumulation of savings and reduction of debt is another set of measurables Keene tracks. Since the tenant portion of their rent does not increase in the step subsidy program when the household's income increases, the tenant could use it to finance other costs of living necessities, reduce debt or build savings. The RSR program is designed to help tenants gain the personal financial management knowledge to make decisions that best help them achieve their goals.

Families who are not working receive a strong incentive to gain employment and take advantage of the employment programs. Families who move to work during or after their first year in the program benefit as they may have started with a very low tenant portion during their initial year but after gaining employment and receiving income, still benefit from a high subsidy level at 65% of the VPS regardless of their increased income. This helps the family stabilize and advance their financial and employment stability over the next two years before their subsidy is reduced to the final and third step subsidy level at 45% of the VPS.

Cases of hardship are referred to the Safety Net program. The ability to adjust the percentages of the VPS on which the step subsidies are based allow Keene to adapt the program to changing economic circumstances and maximize use of subsidy and while maintaining rent affordability for participants.

As with the Public Housing Step Rent program, it is expected that a Step Subsidy program will encourage and support self-sufficiency. Also, the method of subsidy calculation will allow more families to be served.

Baseline and Measures

Keene has traditionally monitored rent burdens of active participants over the years to evaluate this initiative. Keene will continue to monitor rent burdens, employment status, and local economic factors such as rents, utility costs, unemployment rates and costs of living as they impact rent affordability. Accumulation of savings and reduction of debt is another set of measurements Keene tracks. Since the tenant portion of their rent does not increase in the step subsidy program when the household's

income increases, the tenant could use it finance other costs of living necessities, reduce debt or build savings. The RSR program is designed to help tenants gain the personal financial management skills and knowledge to make decisions that best help them achieve their goals.

Data Collection

The information is tracked in an access database. Information on rents and housing subsidy are tracked in the Section 8 database.

Authorizations: Attachment C. Section D.2 Rent Policies and Term Limits.

The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

B. Safety Net: Keene's Hardship Policy for Public Housing and Section 8

Statutory Objective:

Description

The Safety Net program provides temporary relief to households experiencing a financial hardship. The Safety Net program allows participants to work off a portion of their rent by completing jobs for the Keene Housing Authority, following a payment arrangement, or requesting Keene Housing Authority allow a reduction in the rent/increase subsidy for a specified period of time by conducting an interim adjustment.

Participants who work to pay rent receive an hourly rental credit toward their rent balance. Safety Net is not meant to take the place of full-time employment for the participants who are able to work. Participants are encouraged to find employment rather than use the Safety Net program. It is meant to be temporary assistance during times of economic hardship.

Information on the Safety Net program is distributed during lease-up and/or issuance, during annual certifications and self-certifications to remind housing recipients that they are entitled to apply for assistance. No one shall be denied the opportunity to apply, but acceptance is at the sole discretion of the Keene Housing Authority.

Safety Net Eligibility Guidelines

Anyone who receives assistance under the MTW program may apply for assistance through the Safety Net program. Applicants must meet all three of the following criteria to be eligible for Safety Net:

- In good standing with the Keene Housing Authority
- In compliance with the RSR program
- Income eligible: resident pays more than 30% of their monthly income toward rent

Once an applicant meets the basic eligibility criteria, the Safety Net Committee will consider additional criteria such as:

1. Applicant presents a valid, verifiable reduction in income by job loss, change in household composition of income earners or other extraordinary circumstances
2. Applicant has lost their job for good cause or is unable to work
3. Flat, Minimum or Step Rent Level is not affordable (more than 30% of the Resident's monthly income)
4. Extraordinary circumstances (such as an increase in qualified expenses)
5. Applicant applies by the 20th of the month prior to the month for which they are requesting assistance or within ten days of the effective date of their income or expense change.(with exception of unexpected occurrences such as loss of job or illness)

Once an applicant has been accepted into the Safety Net program, they must sign an amendment to their lease or Family Obligations Contract that adjusts their rent/subsidy for a specified period.

Impact

The intention of the Safety Net program is to provide a temporary hardship policy for participants who cannot afford to pay rent due to circumstances beyond their control. Keene understands that circumstances such as loss of job, death of a partner or other factors can create hardships that require additional assistance. Safety Net has also served as an opportunity for participants to develop job skills. Many of the participants who have been given a work assignment in exchange for rental credits have achieved employment through the Keene Housing Authority and other local businesses as a result of the skills and experienced gained while participating in a Safety Net job assignment.

Baseline and Measures

The number of participants who request Safety Net, the reasons for their requests and the type of assistance received in Safety Net are monitored to track the impact of external factors and its MTW policies. Safety Net is an indicator of the health of the rent reform initiatives. If Keene witnesses a large percentage of HAC Step Subsidy participants requesting or receiving Safety Net assistance, the agency would need to reevaluate its initiatives and external factors to determine if changes are necessary in its policies. The number of participants has been steady over the years with five to ten households, at most, participating in the program at a given time. This will continue to serve as the benchmark as Keene monitors the number of Safety Net cases over the next year, especially as utility costs are shifted from landlords to the tenants.

Data Collection

Safety Net cases are tracked in an access databases. They are recorded as applications are received.

Authorization(s): Attachment C. Section D.2 Rent Policies and Term Limits.

The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I)

of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

C. Initiative: Ongoing Eligibility Administration

Statutory Objective(s): Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Description

Annually Keene Housing Authority reexamines the family characteristics to ensure the family is in the correct size unit or has the correct size voucher. Keene Housing Authority conducts a full recertification of income during the years households are moving from one Step Rent level to the next. Once the household has reached the final step, a full recertification of their income occurs every three years. During the interim years, households report their income through the self-certification process. Households still execute a HUD consent form every year. Full recertifications are held every three years for income-based households who are not in the Step Rent or Subsidy program. During the interim years, they will also complete a self-certification form.

Keene also removed the interim requirement for reporting increases in income.

Impact

The verification process consumes a tremendous amount of staff time. By implementing a standard deduction, a large portion of administrative costs are reduced without removing the benefit for a tenant. If a tenant has extraordinary medical costs not covered by the standard deduction, they may request their deduction be based on actual expenses through our Safety Net hardship policy. It is a win-win situation for both parties. It also limits the intrusiveness in tenant's lives. The requirement for tenants to track their individual expenses causes a tremendous amount of anxiety on a yearly basis for elderly and disabled families. Additionally, there is no need to conduct a full recertification for families if their rent is based on a step subsidy system and not their income. Continuing the process creates excess administrative work and defeats the purpose of the demonstration. Households with income-based rents in the MTW program are mostly on fixed incomes. Keene has not found any problems with elderly or disabled households fully reporting their income. The standard deduction, discussed in the next section, further removes the need to conduct a full recertification.

This activity was originally authorized as an amendment to Keene's original MTW Plan approved by HUD on October 6, 2004.

Baseline and Measures:

Keene will monitor the impact of the deduction on subsidy funds expended and number of participants requesting Safety Net because their medical expenses are higher than the standard deduction. This information will help us evaluate whether or not the standard deduction is sufficient to cover the median medical expenses of households yet not so high that the program is using more funds for subsidy than necessary.

Data Collection

This information is collected annually during the tenant's certification, whether it be a self-certification or full certification.

Authorizations: Attachment C. Section D.2 Rent Policies and Term Limits.

The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.

D. Initiative: Standard Deductions

Statutory Objective(s): Reduce cost and achieve greater cost effectiveness in Federal expenditures.

In its 2006 Annual Plan, Keene Housing Authority created a standard deduction for elderly and disabled households. A standard deduction of \$1718 is provided for all elderly and disabled households. This deduction includes any qualifying medical, disability assistance expenses, child care expenses and the elderly household deduction of \$400. It does not include the \$480 deduction per household dependent. Households with qualifying dependents receive \$480 per qualifying dependent in the household in addition to the standard deduction of \$1500. It is still assumed that residents can pay 3% of the medical expenses which is subtracted from the standard deduction. Households that would experience a rent burden of 30% or higher of their adjusted income would be eligible to receive a full deduction based on their actual qualifying expenses plus the standard \$400 deduction. In these cases, staff follow the standard procedures for calculating adjusted income, including verification procedures.

In an amendment to the 2007 Annual Plan, Keene Housing Authority included a clause that allows the standard deduction to be adjusted on a yearly basis according to the Medicare increase.

Impact

The verification process consumes a tremendous amount of staff time. By implementing a standard deduction, a large portion of administrative costs are reduced without removing the benefit for a tenant. If a tenant has extraordinary medical costs not covered by the standard deduction, they may request their deduction be based on actual expenses through our Safety Net hardship policy. It is a win-win situation for both parties. It also limits the intrusiveness in tenant's lives. The requirement for tenants to track their individual expenses causes a tremendous amount of anxiety on a yearly basis for elderly and disabled families.

Baseline and Measures:

Keene will monitor the impact of the deduction on subsidy funds expended and number of participants requesting Safety Net because their medical expenses are higher than the standard deduction. This information will help us evaluate whether or not the standard deduction is high enough to cover the median medical expenses of households yet not so high that the program is using more funds for subsidy than necessary.

Data Collection

This information is collected annually during the tenant's certification, whether it be a self-certification or full certification.

Authorization(s): Permitted by waiving Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518.

E. Initiative: HQS Inspections

Statutory Objective(s): Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Description

Keene Housing Authority conducts initial inspections for all units and encourages new landlords to participate in the initial inspection. Landlords are encouraged to conduct annual inspections on the units. However, 64% of the landlords view inspections as a service and have requested Keene Housing Authority to conduct their annual inspection. In the HAC Program, Keene Housing Authority conducts the initial inspections (as well as educating the landlords with HQS inspections). Interim inspections are conducted by Keene Housing Authority if requested by the participant, landlord or Keene Housing Authority.

Landlord Education and Participation

Landlords are encouraged to contact Keene with any questions they may have about the HQS. The owner is not responsible for a breach of the HQS that is not caused by the owner, and for which the family is responsible. Furthermore, the Keene Housing Authority may terminate assistance to a family because of the HQS breach caused by the family.

Family Education and Participation in HQS

Keene Housing Authority staff work on a regular basis to educate program participants about HQS, providing them with increased ownership over the leasing process while making sure they are not living in a sub-standard apartment. The program is designed to educate the residents so they are empowered to make informed decisions when searching for or living in an apartment. Due to this education, they are able to determine first hand if there are issues that need to be addressed to make sure the unit continuously meets HQS.

The education process starts with an intensive orientation before a HAC is issued. The participant's responsibility for ensuring that their rental unit meets the HQS is explained during this process. During the issuance of Housing Assistance Coupons, a Keene Housing Authority staff member provides a detailed explanation of Housing Quality Standards (HQS) utilizing the following materials:

- A Good Place to Live
- Inspection Form for the Housing Choice Voucher Program
- Protect Your Family from Lead in Your Home
- KHA checklist

Keene Housing Authority employees inquire about and discuss HQS during quarterly meetings and monthly contacts. Participants are asked during the Annual Review, about HQS and staff briefly reviews the HQS. Participants are asked to complete an inspection form demonstrating that they have assessed the condition of their apartment and determined whether it meets HQS.

During quarterly Resident Self-Reliance program meetings, families complete and update family information including information on HQS in their units. During the Annual Recertification process, participants are asked about the HQS and a brief review of HQS is conducted.

At least 5% of all units self-certified by the landlord are selected for a quality control inspection every year. The Keene Housing Authority employs several types of inspection strategies to ensure all subsidized apartments meet HQS in addition to extensive education programs for both the participant and the landlord.

HCV Planned Inspections Completed	Target Percentage Completed	Actual Percentage Completed
Annual HQS Inspections	100%	100%
Pre-Contract HQS Inspections	100%	100%
HQS Quality Control Inspections	100%	100%

Every three months, 5% of all units self-inspected by landlords receive a quality control inspection conducted by Keene Housing Authority. If the owner fails to maintain the dwelling unit in accordance with HQS, the Keene Housing Authority will take prompt and vigorous action to enforce the owner obligations. The Keene Housing Authority's remedies for such breach of the HQS include termination, suspension, or reduction of housing assistance payments and termination of the HAP contract.

The Keene Housing Authority will not make any housing assistance payments for a dwelling unit that fails to meet the HQS, unless the owner corrects the defect within the period specified by the Keene Housing Authority and the Keene Housing Authority verifies the correction. If a defect is life threatening, the owner must correct the defect within no more than 24 hours. For other defects, the owner must correct the defect within no more than 30 calendar days (or any Keene Housing Authority approved extension).

Impact

Again, the intended impact is to reduce the administration required to execute the program while shifting some of the program responsibility to the tenants in an effort to integrate self-sufficiency activities into the housing component. It may also indirectly have an impact on the quality of tenant-based housing units as tenants become more educated about HQS standards and local code requirements.

Baseline and Measures

Keene monitors the number of HQS violations not addressed through quality control inspections. Keene has been conducting quality control inspections of units since the start of the initiative and has not found a trend in landlords failing to meet the HQS standards or falsely certifying their units meet HQS on the Landlord certification form.

Data Collection:

Results of quality control inspections are tracked in spreadsheets the quality control inspections are conducted each quarter.

Authorization(s): Attachment C. Section D.5. Ability to Certify Housing Quality Standards

The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. This authorization waives certain provisions of Section 8(o)8 of the 1937 Act and 24 C.F.R. 982, Subpart, Subpart I as necessary to implement the Agency's Annual MTW Plan.

F. Initiative: Resident Self-Reliance Program (RSR)

Statutory Objective(s): Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in on the job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

Description

All families participating in the Step Rent or Subsidy programs are required to participate in the RSR program. An expansion of Keene Housing Authority's former Family Self-Sufficiency program, RSR provides service coordination and case management to help families become economically self-sufficient, recognizing that self-sufficiency will vary widely based on individual participant's abilities. Every family in the program is assigned a Resident Service Coordinator who is responsible for coaching the participant's progress.

The RSR program defines competencies for self sufficiency. These competencies outline the skills necessary to achieve economic self-sufficiency. Each family's needs are identified during an initial assessment. The competencies residents must work on are identified by the RSC and participant working together. In order to be exempt from required activities, participants must demonstrate they have developed the skills associated with each competency. Competency categories include the core skill groups of financial management, employment, education, and family planning in addition to the self-development groups of interpersonal skills, wellness, healthy relationships and household management. The program is uniquely tailored to the family's skills, resources and goals. Each family works to achieve competencies specific to their circumstances, since the abilities and backgrounds of participants are diverse and one plan would not be suitable for all families.

There are four main program requirements participants must engage in to remain active in the Spectrum program and maintain their housing assistance:

- Develop a financial plan
- Participate in quarterly goal setting meetings
- Participate in required skill development activities
- Make reasonable progress toward ISTP goals

Develop a Financial Plan

Each participant receives extensive counseling in financial management from the moment they lease-up in the program. They are taught how to track their income and expenses, develop a financial plan, calculate their net worth, read and interpret their credit score and manage debt.

Quarterly Goal Meetings

Participants meet on a quarterly basis to review progress on their goals in small groups of up to 20 people. The intention of these meetings is to provide an opportunity for program participants to

network, problem solve, share successful strategies and learn about new resources, programs, and financial management and employment strategies. Topics may include tax filing, job search strategies, saving for a financial goal, etc. At the end of every meeting, participants update their Individual Service and Training Plan (ISTP). An ISTP outlines the family's goals and the steps and resources required to meet them.

Skill Development Activities

Participants who need to achieve competencies are required to accomplish take home activities or workshops that will assist them in developing the associated skills. There are numerous workshops facilitated by Keene Housing Authority staff, as well as programs run by outside agencies.

Goal Setting

Every person is required to develop and update their ISTP every quarter. The ISTP helps participants identify a goal and break it down into simple steps. Participants are taught how to write SMART goals (Specific, measurable, achievable, resources, and time lines). They are required to document and track their progress on these forms and revise them as their goals change or new goals are added once significant milestones have been achieved.

The RSC acts as a coach and mentor guiding their participants to self-sufficiency. All RSCs are trained in financial management programs and are available to meet one on one to provide additional assistance to participants.

RSR Waiver

In 2005, the RSR waiver was implemented for those who have achieved all of their required competencies which waive certain RSR activities meeting with their RSC annually to review progress toward their goals. We anticipate a majority of families who qualify for this waiver will move into the Homeownership program but not all.

In order to receive the waiver, the household must present a portfolio that demonstrates how they have achieved the required competencies and the progress they have made on their goals. This process provides recognition for families for their accomplishments in the program. The skills they learn in creating and presenting the portfolio also helps them gain valuable public speaking and presentation skills valuable in the workplace.

Quarterly Goal Meetings

Two Tracks, employment and Finance, are offered every quarter. Within each Track there are three groups from beginner to advance skill level from which participants can elect to attend. Each of the groups is offered twice every quarter for a total of 12 meetings every quarter. Agendas are based on need identified from data collected from families in the program and their ideas.

Employment Track Meetings

- Track A Career and Life Planning
- Track B Surviving the Job
- Track C Management and Advancement

Financial Track Meetings

- Track A Financial Management
- Track B Credit and Debt Management

- Track C Homeownership and Long Term Financial Planning

First year participants must participate in Goal Setting at a Glance and Developing Your Financial Plan which serve as the foundation for developing skills they will build upon as they move through the different tracks throughout their participation in the program.

Impact

The purpose of the program is to provide families with the knowledge, skills and resources they need to achieve economic self-reliance. This task has become more difficult for families over the past several years with dramatic increase in costs of basic needs such as food, clothing shelter and transportation. In addition to affordable housing and livable wages, families will continue to need the support of the program to navigate the turbulent economy. Participants receive free employment and financial counseling to help them achieve their goals.

Baseline and Measures:

Keene has tracked since the inception of the demonstration, a wide variety of data on families in the program including public benefits, income, employment and job benefits, education level, service needs, child care, savings, assets and credit issues to name a few. Keene collects information on participant's employment, education, assistance levels, income and other factors. This information is used to evaluate the ability of participants to achieve self-reliance and the obstacles they may face in reaching the goal.

Data Collection:

Data is collected from families during quarterly goal meetings reported on a case management form. The information is then entered into an access database that has tracked all program participants since 1999. While primitive, the database has served its purpose.

Authorization(s): Attachment C. D.2.c. Rent Policies and Term Limits

The Agency is authorized to develop a local process to determine rent reasonableness that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(10) of the 1937 Act and 24C.F.R. 982.507, as necessary to implement the Agency's Annual MTW Plan.

G. Initiative: Rent Reasonableness

Statutory Objective(s):

Description

Keene Housing Authority removed rent reasonableness as a requirement in the MTW Section 8 program. When approving a unit, potential voucher holders do not have to meet the 40% rule. The responsibility of determining affordability is left to the participant. The program assumes participants are capable of making these decisions and provides education to every household member. Participants are trained to consider factors such as location, quality, size, number of bedrooms, age, amenities, housing services, maintenance and utilities. These factors are a better gauge of determining rent affordability than the 40% rule, as they are adjustable to individual circumstances and local market conditions. Additionally, participants are trained to negotiate rents with landlords.

Families also receive the document “Can I Afford the Unit I have Found?” with a detailed explanation of how to calculate affordability. The family must fill out and sign an Income and Expense Report with the program manager detailing their ability to afford the apartment. The Income and Expense Form is updated and reviewed at each examination.

Affordability Factors

- Age of the Head of Household
- Disability
- Currently in place
- Length of time family has lived at that address
- Actual dollar amount the family share exceeds 40% of their adjusted monthly income
- Location- near work or medical services
- Transportation
- Amount of assets a family has at its disposal
- Employment
- Contract Rent-does it include utilities?
- Fuel Assistance and/or Electrical Assistance
- Food Stamps and/or Community Kitchen

Impact:

Keene has a high success rate of households finding housing after they have been issued a voucher. As of the third quarter in 2008 all households who were issued vouchers found housing. Keene will continue to track its success rates in future reports. Removal of rent reasonableness and restriction of tenant rent to 40% of income increase housing options for families.

Baseline and Measures

Keene tracks utilization rate, success rates of tenants issued vouchers, reasons tenants do not find housing and rent burdens.

Data Collection

The information is collected and tracked in spreadsheets and program databases.

Authorization(s): Attachment C. D.2.c. Rent Policies and Term Limits

The Agency is authorized to develop a local process to determine rent reasonableness that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(10) of the 1937 Act and 24C.F.R. 982.507, as necessary to implement the Agency’s Annual MTW Plan.

H. Keene Housing Authority Special Programs

Homeownership

There are 2 homeownership programs offered by the Keene Housing Authority. The Heading for Home Program (H4H) offers eligible participants the option of buying a home with mortgage payment assistance through the Section 8 Housing Assistance Coupon (HAC). Eligible applicants for H4H must be eligible for a HAC. Current Keene Housing Authority residents or HAC participants will receive a

preference for the H4H HAC. H4H participants will also be required to participate in a Homeownership program facilitated by Cheshire Housing Trust, a HUD approved homeownership counseling agency.

Keene used its' MTW authority to permit households who graduated from the Resident Self-Reliance program to remain eligible for a flat rate of assistance if they were over the income limits but below 140% of the AMI. The purpose was to provide an incentive and reward for RSR families who were successful in the program. Keene didn't want to penalize families who were able to increase their income during the program by denying them homeownership vouchers.

Keene Housing Authority was also awarded the Public Housing Supportive Services Homeownership grant starting in fiscal year 2006. This program provides funding to expand homeownership counseling services to RSR Public Housing families with the specific goal of moving at least 10 families into homeownership each year. This is an extremely ambitious goal given the size of the Keene Housing Authority and the very tight and expensive local market. To date, a total of 11 households are enrolled in the Heading for Home program.

Homeownership Programs Information Sessions

The homeownership program of the Keene Housing Authority (KHA), known as the "Heading for Home Program" (H4H) offers eligible participants in the HAC or HCV programs the option of buying a home with mortgage payment assistance. The Keene Housing Authority also offers homeownership supportive services programs to public housing residents through a 3 year ROSS grant received from HUD in 2006. These programs as well as the homeownership Seminars and IDA accounts offered by Cheshire Housing Trust are reviewed for interested participants and the public wishing to learn more about programs available to help them achieve homeownership.

Building Bridges Youth Program

The BUILDING BRIDGES program uses several strategies to influence youth development, family and community to prevent juvenile delinquency. On average about 50 youth are served by the program annually. The program is offered to all family residents living in public housing operated by the Keene Housing Authority at both Harmony Lane and North Street housing communities. It is funded by a local grant through the Division of Children Youth and Families. There is a Family Activity Center at each community from which the program operates. The center has been the hub of the community, attracting and encouraging positive interaction with all youth, adults and staff. Program components include:

- Case management services for youth and their families
- Daily after-school and summer program for youth ages 5 through 10 (open to all youth up to age 18)
- Life skill workshops for teens and adults
- Community events and improvement projects

Case Management

All families that move to either Harmony Lane or North Street are automatically referred to the Building Bridges Youth Services programs by Keene Housing Authority staff. The Building Bridges program is integrated with the Resident Self-Reliance program for adults so all members of the family are served. After a family has signed the lease they are required to participate in the RSR assessment that identifies the family's assets and risk factors associated with the following categories:

- Employment
- Financial management
- Parenting and Family Planning
- Education
- Wellness
- Household management
- Interpersonal skills

The family then creates a plan to develop their skills to achieve competency in each of these areas for a five year period. The plans outline specific steps they must take within a given quarter to make progress in achieving the competencies. The plan includes required skill development activities they must complete in order to achieve a competency. Adults participate in group quarterly goal meetings to discuss and problem-solve ways to overcome obstacles in meeting their goals. Participants benefit not only from the facilitation and knowledge of the Resident Service Coordinator but they also benefit from their peers. Participants are likely to listen to others who are experiencing similar situations, offer advice and support and gain self-confidence when they have the opportunity to share an idea, offer advice or help someone problem solve and find themselves in an 'expert' role.

Youth participate in a similar process. They are interviewed by staff and a youth development plan is formulated with their parent's that lists activities the parents, youth and children can do to support the plan. The assessment reviews risk and protective factors and a plan is created to reduce high risk factors associated with the individual youth and increase their protective factors. Progress on the plan is reviewed and revised quarterly with youth, parents and staff.

Daily After-School Program

Homework Lab runs daily for 1 ½ hours providing youth with tutoring assistance and academic enrichment programs. As a result, there has been an overall improvement in the grades of youth attending the program in the past three years. Keene Housing Authority Youth Service Coordinators have developed strong partnerships with the local schools including Franklin, Fuller and Keene Middle School. Staff attends lunches with students at school and as needed meetings with teachers and guidance counselors. Schools provide copies of youth report cards and share weekly homework assignments with staff. Teachers have visited the sites to tutor individual students and provide staff with tools to assist youth with their academics.

Daily activities reflect current risks and needs of the youth in the program. The program's main focus is to serve youth ages 5 through 10 but youth up to age 18 may participate. Many teens are able to participate as volunteers, in the program. Middle school age youth are referred to the local MANY Options program by staff; all fees are paid by Keene Housing Authority.

Life Skills Workshops - Workshops are offered for all teens and adults in all of the competency areas. They are offered throughout the year as resources permit and demand requires and include GED classes, computer training, employment retention, household management, financial management and parenting. Parenting workshops are required for parents with high family risk factors such as inconsistent rules at home, abuse, or violence. Workshops offered encourage parent teacher conferences and build the ability of parents to communicate effectively with schools on behalf of their children. Teachers and KHA staff facilitate the workshop at the Family Activity Centers.

Community Coordination, Events, and Education

BUILDING BRIDGES Youth Services Program seeks to build community connections by offering events that encourage positive interactions and build a sense of ownership and responsibility. Youth coordinate community service events focusing on their neighborhood such as community beautification projects, cooking and delivering meals for families, participating in Kick Butts Day or hosting games for nearby elderly residents. All adult and youth residents have the opportunity to participate on the Residents Council and plan events with the support of staff such as the annual Easter egg hunt. The Family Activity Center hosts family events, and meals at the activity center are cooked and prepared by youth and parent volunteers.

Youth	Family	Community	School
After School Program activities focusing on the components of the work plan (Please see attached)	Goal Achievement and Coaching Services	Community events both on and off site, held monthly	Support for parents in communicating with the schools
Daily Homework Lab aided by KHA Staff, tutors, and volunteers	Self-Sufficiency Workshops	Resident Committees including “Coffee Chat” Group	Regular meetings with school officials
Service Coordination with local agencies including MANY Options, YMCA, Recreation Center	Service Coordination with local agencies	Community Service Programs and projects including Community Clean Up Day and “Adopt a Grand-Friend”	Parenting Series offered by Franklin school on-site
Mentoring with Big Brothers Big Sisters as well as volunteers and KHA staff	Parenting Programs hosted by Family Strengths, Planned Parenthood, MDS, CHINS	Big Brothers Big Sisters of the Monadnock Region Collaboration	Guidance Counselor Recommendations
Field Trips that accommodate all ages and sections of the year’s work plan	Family Events	Community Celebrations including Holiday parties and the Keene Pumpkin Festival	School supported events such as Kick Butts Day anti-tobacco campaign

Keene Mentoring Alliance

Clubhouse youth program continues to maintain and strengthen alliance with **Big Brothers Big Sisters of Monadnock Region** and **Monadnock Volunteer Center (MVC)**. Youth Service Coordinators meet regularly to discuss youth and programs and to facilitate new matches. The site-based program in which “Bigs” have meeting times with “Littles” continues during after-school program hours so youth have special one-on-one times.

Academic Achievement: Daily homework labs facilitate academic assistance and encourage youth to complete their school assignments in an organized and efficient fashion; thereby developing positive and productive attitudes towards education. Volunteers from Keene State College help facilitate daily homework labs.

Wellness and Healthy Choices: Throughout the year, youth are offered a variety of physical activities and nutrition classes. We have added a new and exciting Kids Fitness Class at the Keene YMCA thanks to a generous grant from PlusTime NH.

Congregate Housing Services Program at Bennett Block and Harper Acres

The Congregate Housing Services Program (CHSP) is a non-medical supportive program offered at Harper Acres and Bennett Block in Keene the CHSP is often described as the first step away from fully independent living. The CHSP offers services that enable residents to live in individual apartments; the services help to avoid premature admission to a nursing home or assisted living facility. Specifications for the program meet standards set by HUD and the New Hampshire Department of Health and Human Services (DHHS). Funding for the program is provided by HUD, DHHS and a participant fee. Services of the CHSP include a noon meal seven days a week; services to assist with homemaking and a limited range of personal care assistance. Assistance with area transportation services is available and at Harper Acres transportation to the meal site located in a community building is available during the winter months. Case management is provided by the CHSP Service Coordinator.

Individualized care plans are developed by the CHSP Coordinator and reviewed by the PAC to ensure that services meet the needs of the resident. Care plans are updated at least yearly and more often if needed. Program admissions are the responsibility of a Professional Assessment Committee (PAC) the PAC meets monthly to review needs assessment of new CHSP applicants. Needs assessments are completed by the CHSP Service Coordinator and documentation by the applicant's physician is required. In addition to admissions PAC members offer consultation and suggestions to the CHSP Coordinator as needed. The current PAC remains the same as last year; consisting of five members; three registered nurses (one retired) and two social workers. The individual and collective wisdom and knowledge of the PAC is invaluable to the CHSP coordinator and program. The CHSP Coordinator has been with the program since 2001.

CHSP homemaking and personal care services are contracted through a local home healthcare agency that is fully licensed and accredited. Meals are prepared at a central site and are then transported in bulk under temperature control to the meal sites; meals are served home style. Residents like the hearty menus and also that the meal program supervisor listens and responds to suggestions. Meals provide at least one-third of the daily recommended dietary allowance for the older adult as established by the Food and Nutrition Board of the National Academy of Science.

Social opportunities occur on a regular basis including an annual picnic and holiday party; other social and educational opportunities such as visits from children in KHA's youth and after-school programs; musical entertainment; health topics and screenings and other topics of interest such as information about Medicare Part D. Interaction with nutrition students from Keene State College continues providing a good source of health information and social interaction to residents who choose to participate. Age-in-Motion exercise programs a YMCA program that's geared for older adults is very popular. The social and educational programs at Harper Acres are available to all residents of the complex.

Interest in the CHSP program remains very good; apartment vacancies are filled quickly. Success in fulfilling the program goal of supporting independent living has resulted in lengthening the wait for CHSP vacancies.

Family Planning Collaborative

KHA and other social service and health care providers recognized that unintended pregnancies (which result in about half of the births in the United States) are a major threat to the health and financial well being of children and families. They are also responsible for enormous social service and health costs. These agencies formed the FPC to coordinate their education and case management efforts.

With limited funding, the FPC:

- Keeps records of pregnancy intentions and other characteristics of women giving birth at Cheshire Medical Center (CMC)
- Provides education and support to social service providers to help them discuss family planning and birth control. Also provides educational materials.
- Coordinates efforts with Dartmouth Hitchcock and Planned Parenthood to provide birth control education.
- Provides free condoms in some social service restrooms.
- Provides birth control education at Keene's transitional housing programs and other sites.

Section VI. Sources and Uses of Funding

A. Planned Sources (Operating, Capital, HCV)

Consolidated Budget Statement for AMP NH010000101

	2008 Projected Public Housing	2009 Budget Public/LIHTC Housing	2008 Projected Section 8- 359 Vouchers	2009 Budget Section 8- 359 Vouchers
Sources				
PH Rental Income	860,000	400,000	0	0
LIHTC Rental Income	0	400,000		
Non Dwelling Income	41,788	41,788	0	0
Section 8 -359 Vouchers	0	0	2,989,752	2,989,752
Section 8- 228 Vouchers	474,696	1,898,784	0	0
Operating Fund	655,641	327,820	0	0
PH Capital Fund	326,587	163,293	0	0
Congregate Program	48,000	48,000	0	0
Interest Income	1,800	1,800	8,000	8,000
Other Income	33,700	12,000	0	0
Total Sources	\$2,442,212	\$3,293,485	\$2,997,752	\$2,997,752
Uses				
Administrative	344,516	348,111	666,277	675,774
Programs & Services	135,000	145,000	215,699	227,052
Utilities	525,000	485,000	0	0
Maintenance	775,000	581,250	0	0
General Expenses	188,000	283,416	2,000	2,100
Disposition & Relocation	474,696	501,316		

HAP Disbursed	0	949,392	2,113,776	2,092,826
Total Uses	\$2,442,212	\$3,293,485	\$2,997,752	\$2,997,752

B. Changes in Sources & Uses from Previous Plan

The Deputy Assistant Secretary, Office of Public Housing Investments, approved the KHA's FY 2008 MTW Plan on December 5, 2007. The Plan included the disposition of 228 units of public housing. The disposition was approved in April 2008. Subsequent to the disposition approval, KHA submitted a request for 228 disposition vouchers in accordance with Notice PIH 2007-10. In June 2008, KHA received an amendment to our Section 8 ACC for 228 units of Section 8. The Sources and Uses schedule for 2009 includes the 228 disposition vouchers.

The 2008 Projected Budget for Public Housing includes the allocation of the additional 228 vouchers. Monthly funding for these vouchers began in October. The \$474,696 received for October through December is being used to cover the initial costs associated with the disposition, renovation, and relocation costs.

The 2009 Budget for Public Housing assumes a transfer date of July 1. The goal is to close on the project in April 2009, however the budget allows for additional timing to accommodate investor, banking, and legal processes that may delay the closing. The schedule reflects 6 months as public housing and six months as LIHTC housing. The complexity and magnitude of this project will affect the budget based on timing and other factors.

The 2008 Projected Budget for Section 8 is based on the actual expenses to date and the projected expenses for the remainder of the year.

The 2009 reflects the increased costs we anticipate.

Reserves

Operating reserves for public housing have been depleted as funding has decreased. Currently there is \$10,000 in reserves. Projected funding levels are inadequate to complete the extensive amounts of improvements that are needed for the properties. As part of the disposition and renovation budgeting process, sufficient operating and replacement reserves will be funded.

C. Single Fund Flexibility

In April 2008, KHA entered into an Amended and Restated MTW Agreement by and between HUD and KHA. The agreement authorizes KHA to combine funding awarded to it annually pursuant to Section 8(o), 9(d) and 9(e) of the 1937 Act. Within the scope of permissible eligible activities, KHA can carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve greater cost effectiveness in Federal expenditures, to give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient, and to increase housing choices for low- income families, through activities that would otherwise be eligible under Sections 8 and 9 of the 1937 Act. KHA is authorized to project base Section 8 assistance at properties owned directly or indirectly that are not public housing, subject to HUD's

requirements regarding subsidy layering. All funding for Section 8 is considered completely fungible according to the terms and conditions of the Amended and Restated MTW Agreement.

Funding fungibility allows the KHA to combine the Operating Fund, Capital Fund, and the new funding for the 228 vouchers. By combining these funding sources, we are able to provide funding where it is needed to serve our low-income tenants and to provide services and new opportunities in accordance with our mission.

In 2008, this fungibility is allowing us to cover the upfront costs associated with the disposition and renovation. In 2009, we will use the fungibility to project base the 228 vouchers, to continue in the renovation process, and to use assist those tenants who opt to take their voucher and move out of public housing. The number of vouchers available for the 228 units will decrease as a result of those tenants who opt to move. Funding fungibility allows us to make up for the costs of these vouchers and to still serve our tenants and continue to provide the programs and services we currently offer them.

Section VII. Administrative

Public Hearing Documentation

The 2009 MTW Annual Plan was made available for public comment from September 1, 2008 through September 30, 2008. A public hearing was conducted at 3:00 PM on September 4, 2008. A second hearing was held at 3:00 PM on October 2, 2008.

The following staff were present at the September 4th hearing:

1. CEO P. Curtis Hiebert
2. Julie Davenson, Manager of Policy and Program Development

The following public participants and tenants included:

1. Elizabeth Miller
2. Richard Pigeon
3. Jean Pigeon
4. Anne M. Picle

The following staff were present at the October 2nd hearing:

1. Assistant Director CEO/CFO Deb Guyot
2. Denise Pratt, Housing and Services Manager

The following public participants and tenants included:

1. Lucille Fournier
2. Harriette Smith
3. Elizabeth Miller

The required Board Resolution is included as an attachment to this plan.

Agency Directed Evaluation of the Demonstration

Keene has not engaged any outside evaluators to review the program. The agency will be continuing to evaluate the impact of its proposed and ongoing activities in 2009. The creation of a new position, Manager of Policy and Program Development, should afford additional time to spend in house on the evaluation of the demonstration that was not previously available to staff who were occupied managing the day to day operations of all of Keene's programs.

Keene will be working on identifying new measures for its initiatives and tools to collect and evaluate the data. Policy discussions will be scheduled with key staff as well as regular strategic planning sessions to help monitor and redirect demonstration activities as needed.

Keene values the opportunity to participate in the demonstration and the benefits it affords not only the recipients of its services but the organization. Over the years, the culture of the Keene Housing Authority has been able to shift from bureaucratic routines to that of a learning organization. The perception of staff and their roles has changed with the flexibility granted under the demonstration prompting more inquiry into the impact of its policy and activities on the community. Keene continues to nurture and cherish this growth as it tries to address the impact of a national housing crisis on the local community.

**Annual Moving to Work Plan
Certifications of Compliance**

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 01/2009, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 30 days before the public hearing, published a notice that a hearing would be held and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA 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.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Keene Housing Authority
PHA Name

NH 010
PHA Number/HA Code

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

Ken Jue
Name of Authorized Official

Chairman Board
Title

Ken Jue
Signature

10-08-08
Date

