

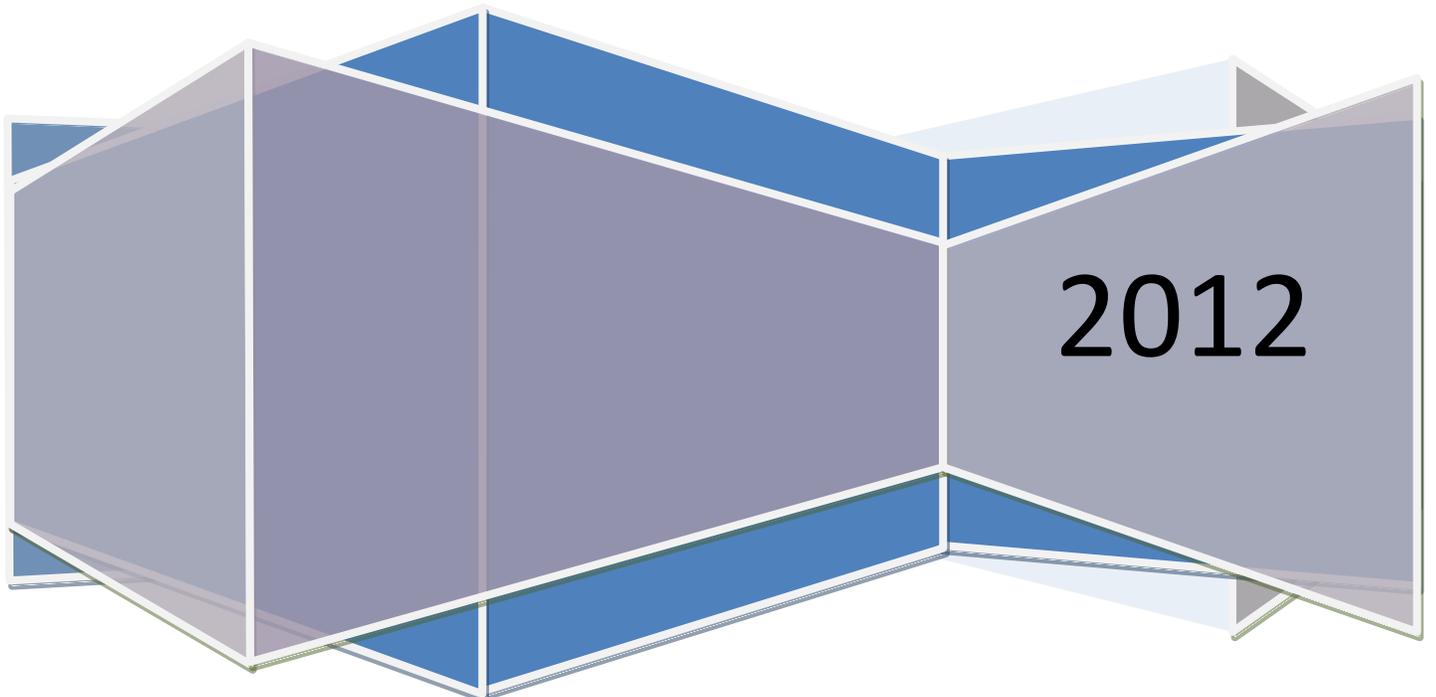
A Program of the Department of Housing and Urban Development



# Keene Housing Authority Moving to Work Demonstration Program

## Annual Plan

Submitted: November 2, 2011  
Re-Submitted: December 9, 2011



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# **Keene Housing Authority Governing Board and Staff**

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## **Board of Commissioners**

Christopher Coates, Chairperson

Audrey Hadcock

Tom Moses

Jennifer Marsh

Lee Robator

## **Chief Executive Officer**

P. Curtis Hiebert

## **Executive Director**

Dorothy D. Guyot

## **Senior Management Staff**

Linda Mangones, Community Development Block Grant Administrator

Bruce Soper, Facilities and Asset Manager

Michelle Young, Accounting Manager

Denise Pratt, Programs and Services Manager

Carolyn Crane, Housing Manager

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## Message from the CEO, P. Curtis Hiebert

The Keene Housing Authority is pleased to present its plan for the year beginning January 1, 2012. 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 12 years, since 1999, and has resulted in great improvements for our housing and our residents and program participants. During the past year, the KHA has completed most of the work on its properties and continues to improve the stability of our programs on an ongoing basis.

- During the last year, the transfer of the former KHA Public Housing units to its not-for-profit affiliate was completed, and the extensive renovations on these properties are very nearly done. The renovations required moving some tenants temporarily, however, the KHA was very sensitive to the disruption that this caused the families and tenants were offered significant staff support through the transition and seem to be pleased with the ultimate significant improvement in their living situation. During this transition process the residents maintained the benefits of the Spectrum Housing Program and the incentives and simplifications it contains.
- We believe we have largely achieved our goal which was to have the 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 income residents that are our mission to serve. KHA recognizes that we must be constantly vigilant to maintain this quality.

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

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. 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 35.

#### Organization

Keene Housing Authority is a small agency that operates a full diversity of housing programs including HUD Multifamily programs, Low Income Housing Tax Credit programs, Rural Development, HOME and Community Development Block Grant program. The diverse portfolio of housing and services enables the agency to fulfill its goal of providing affordable and quality

*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.*

housing to the Keene and surrounding communities now and into the future. As a small agency, it is challenging to administer the complexity of these programs. Keene does not have staff resources to create positions or departments that specialize in compliance, data management, policy development, etc. The flexibilities granted under MTW help alleviate some, not all, of the administrative requirements so staff can focus their time working directly with clients to address housing and service needs of families.

Keene's organizational structure consists of an Executive Director and four major departments as well as several administrative positions. The four major departments include Housing, Programs and Services, Facilities and Asset Management, and Finance. Administrative positions include the Community Development and Block Grant Administrator.

### **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, 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 (MTW) Demonstration Summary**

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Keene Housing Authority was selected as a Moving to Work participant after responding to HUD's initial request for proposals in 1996. The MTW agreement was executed in 1999 and included all of the agency's Public Housing portfolio and Section 8 allocation with the exception of the Mainstream Voucher program. KHA 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 Housing Authority'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 self-sufficiency among families.
- 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 of Keene Housing Authority's MTW Activities and Initiatives

KHA's plans and activities for 2012 are to continue with its successful MTW initiatives. 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.
- 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 rent.
- Provide supportive services such as the **Resident Self-Reliance 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, standard deductions, and HQS modifications.
- Develop plans to implement **energy efficiency programs** at properties owned or managed by KHA.
- Engage in regular **organizational and staff development initiatives** to accommodate the shifting paradigm of how we serve residents and the community.

## C. 2012 Operating Goals

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### Spectrum Housing Choices

It is a goal of the KHA, beyond the MTW demonstration, to expand housing options. For more than a decade, combining the flexibility of the MTW demonstration with KHA's various housing programs, dramatically expanded housing choices for residents of the Monadnock region. This section focuses on the KHA Operating Goals that have expanded housing opportunities under the MTW program.

The Keene Affordable Housing project was completed in 2011. Pursuing the goal of maintaining and preserving KHA's existing portfolio; KHA began the process of updating

capital needs assessments for several properties in its portfolio in 2011. This process included initiating funding strategies and submission of funding requests.

The KHA hopes to complete extensive structural and grounds improvements at several properties in 2012. Window replacement and site re-grading for proper water runoff is planned for Riverbend, a 24 unit family property located in Swanzey, NH. Several scattered sites in Keene will be improved with various internal, external and landscaping capital projects. LED lighting fixtures will be installed at various properties in common areas, exterior areas and parking lots.

Complete rehabilitation and weatherization is planned at Wedgewood, located in Winchester, NH; anticipating the approval of the Community Development Finance Authority application submitted by the Town of Winchester.

Brookbend is a project involving the acquisition, demolition, and replacement of a 75 unit existing Section 236 project located in Keene, NH. The property will be subdivided into two parcels, which will be owned by two separate Limited Partnerships. An existing HAP contract covering 54 units will be split and extended to 20 years. In addition KHA has committed Project Based Vouchers for a 20 year term to cover the 21 project units that will not be supported by the current HAP. Demolition and site work is expected to start in November 2011.

Administratively, KHA has reviewed and is in the process of updating personnel policies and fiscal processes to reduce inefficiencies and ensure compliance with federal and state regulations. Converting the financial software in 2011 was so successful in streamlining financial tasks and duties; staff time has been allocated to special projects such as custom report writing to aid in monthly and annual federal reporting requirements.

Staff, tenants/participants, and our neighbors in the community provide feedback and input on an ongoing basis helping KHA revise current policies and develop new policies and procedures that meet the ever changing requirements of our demographics. Participation in regular service provider/partner meetings keeps KHA tapped into the housing needs in our service area and gives KHA opportunity to gauge the efficacy of its programs and the impact on other local agencies with whom we share a wide client base. Services staff look for partnership opportunities to stretch ever shrinking resources and maximize the positive impact our

### **Keene Housing Authority Operating Goals**

 Maintain and preserve KHA's existing affordable housing portfolio.

 Improve administrative efficiency of the KHA by reviewing, updating and revising operational procedures, ensuring adherence to current laws and KHA practices.

 Identify the housing needs of special populations in the region and to foster and pursue collaborations to fulfill these needs.

 Provide supportive services for KHA's residents to foster independence and successful tenancies while empowering the residents to take ownership of and investment in their neighborhoods.

 Promote and increase the awareness of KHA's mission, programs, services, and initiatives.

programming provides. KHA will be exploring the feasibility of utilizing social media in 2012 to expand and market KHA services.

KHA is committed to ensuring that we provide the highest quality housing and the highest quality living environment. On-going assessments of how the larger economic and social environments are impacting our tenants will aid in adjusting our MTW Plans and KHA administrative procedures to ensure successful tenancies. Continuing to monitor internal and external measures, reviewing data for opportunities to improve programming or client access to community resources, and strengthening our connections with community providers will enable KHA to continue to deliver housing opportunities that support our mission in 2012 and beyond.

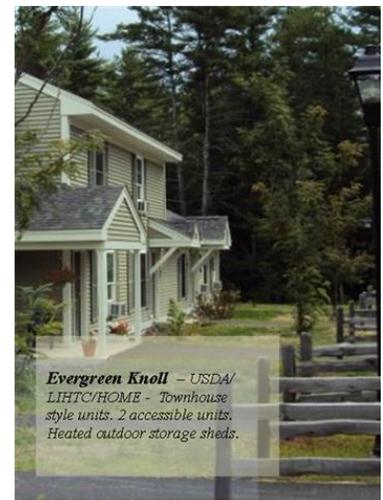
## Section II. General Housing Authority Operating Information

### A. Housing Portfolio

The Keene Housing Authority owns and manages 467 units of housing under multiple governing agents. The largest allocations of units (46%/213) are Conventional and CDBG. The second largest allocation (30%/141) is administered under HUD's Multi-family program. Low Income Housing Tax Credit units comprise the remaining allocation (24%/113). Rural Development and Home programs add another layer of complexity and compliance to the portfolio. As of the fourth quarter of 2009, KHA does not administer Public Housing units. The former public housing units, now privately owned by a KHA subsidiary organization, are subsidized with KHA MTW funds. A complete listing of all KHA properties with project based subsidies can be found in Appendix II.



Keene also owns and manages commercial spaces disbursed among several different properties in Keene. Many of these spaces are rented to local non-profit agencies providing essential services to residents of the KHA. Keene Housing Authority also provides technical assistance and support to other local non-profit housing agencies. Such agencies include Cheshire Homes and Cheshire Housing Trust also operating in Keene and the Monadnock region.



<b>Section 8</b>			
<b>Program</b>		<b>Units Allocated</b>	<b>Project-Based Units 12/2012</b>
Moving To Work (MTW)		587	352 (60%)
Mainstream-5 (MS) <b>NON-MTW</b>		50	0
Non-Elderly/Disabled (NED) <b>Administered under MTW Policies</b>		100	0
<b>Special Programs - Conventional, HOME Like – MTW PBCs (See Appendix II)</b>			
<b>Main Developments</b>	<b>Number of Units</b>	<b>Housing Type</b>	<b>Description</b>
Keene Affordable Housing Properties (KAHP)	213	Family/ <b>Project-based subsidy</b>	Range of units and building styles from efficiencies to 4 bedrooms – <b>14 accessible units</b>
Cottage St. (managed, not owned)	3	Family/ <b>Project-based subsidy</b>	2 and 3 bedroom units – <b>3 accessible units</b>
<b>Multi-Family Section 8 New Construction – NON MTW</b>			
Meadow Road	18	Family	2 and 3 bedroom townhouse style units – <b>2 accessible units</b>
Wedgewood Duplexes	30	Family	2 and 3 bedroom duplex units
Central Square Terrace	90	Senior and Disabled	Efficiencies and 1 bedroom units in high rise with elevator – <b>9 accessible units</b>
<b>Low Income Housing Tax Credit – MTW PBCs (See Appendix II)</b>			
Riverbend (Includes HOME Units)	24	Family/ <b>Project-based subsidy</b>	2 and 3 bedroom townhouse style units – <b>2 accessible units</b>
Evergreen Knoll (Includes HOME units and USDA Subsidy)	32	Family/ <b>3 units Project-based subsidy</b>	2 and 3 bedroom townhouse style units – <b>4 accessible units</b>
Stone Arch Village Senior Housing	33	Senior/ <b>Project-based subsidy</b>	1 and 2 bedroom units in high rise with elevator – <b>3 accessible units</b>
Stone Arch Village Family Housing	24	Family/ <b>Project based subsidy</b>	2 and 3 bedroom townhouse style units – <b>2 accessible units</b>
Brookbend East	40*	Family/ <b>Project-based subsidy</b>	*21 Total Project Based Units at both Brookbend East and Brookbend West. 2 and 3 bedroom units in townhouse style units - <b>2 accessible units</b>
Brookbend West	35*	Family/ <b>Project-based subsidy</b>	
<b>Total Units Section 8 Portfolio</b>		<b>737</b>	
<b>Total Units Residential Portfolio</b>		<b>542</b>	
<b>Total Accessible Units Residential Portfolio</b>		<b>43</b>	
<b>Total Units Project-Based Subsidy Residential Portfolio</b>		<b>321</b>	

### **Moving to Work Housing Assistance Coupons**

As part of the Moving to Work Demonstration program, Keene created the Housing Assistance Coupon program (HAC) in 2000 as an alternative to HUD’s Housing Choice Voucher program (HCV). All of KHA’s Section 8 assistance, with the exception of the 50 Mainstream Vouchers, is

administered under the MTW program. KHA's Section 8 MTW allocation includes 587 Section 8 Coupons. In October of 2010, KHA was awarded 100 non-elderly disabled vouchers. These vouchers are administered under the KHA's MTW administrative policies and are issued to eligible households as tenant based coupons. Some of the assistance is still issued as HCVs rather than HACs for two reasons. KHA continues to honor HCV contracts with landlords signed before the implementation of the HAC program. Existing families are offered the option to convert their HCV to a HAC each year at their annual recertification.

**Projected Section 8 Lease-ups for 2011**

**Moving to Work: 587**

**Mainstream: 50**

**NEDS Coupons: 100**

**Project-Based Section 8**

The approval of KHA's 2011 MTW Plan enabled KHA to begin phasing in 60%, or currently 352 units, of our MTW allocation as project-based units. The plan to project base up to 50%, or 293 units, of KHA's total coupon allocation in the KHA owned and managed properties was included and approved as part of the 2008 MTW Annual Plan. The process started in September of 2009 with the Keene Affordable Housing units. All of these units are currently occupied by former Public Housing tenants who received the option to remain in their units and receive the Section 8 Project-Based assistance or move with a coupon in March of 2009. These coupons are administered as part of the MTW Section 8 allocation called the Housing Assistance Coupon program.

Effective November 1, 2010, KHA executed Project-based HAP Contracts at Riverbend, Stone Arch Village Senior and Stone Arch Village Family. All families at these properties were provided with the same option as the tenants who resided in KHA's former Public Housing; the option to remain in their units and receive the project-based assistance or move with a coupon. Of the 82 families affected by the change, only 1 family chose to move to the private market.

The KHA will continue to phase in approved project-based subsidies in 2012.

**B. Occupancy and Lease-up Information**

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The Moving to Work lease-up projection reflects Keene's total unit allocation under our MTW block grant funding. KHA has a Section 8 waiting list that is approximately 6.5 to 7 years long. KHA's coupon 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

KHA manages separate waiting lists for MTW Section 8, Mainstream HCV, and for each property subsidized with project-based coupons. The Non-elderly Disabled coupons are administered from KHA’s MTW Section 8 waitlist to eligible families meeting the specific program criteria. Applicants choose their housing options when submitting their original application.

KHA is not considering closing any of the waiting lists at this time. Closing the waiting lists might prevent applicants

from accessing resource and referral services. Intake staff provide other referral services to applicants while

Waiting List	Current Households	Current Length	Projected Length
Mainstream	196	2.5 yrs	2.5 - 3 yrs
MTW HAC Coupons	327	6.5 – 7 yrs	7 yrs
Project-Based Coupons	456	6 mo – 4 yrs	1 to 4 yrs

they are on our waiting lists. Waiting lists will continue to be purged at least annually. The next purge is scheduled for February 2012. The waiting lists were last purged in February 2011.

## Section III. Non-MTW Related Housing Authority Information

Reporting in this section is optional.

### Homeownership

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. H4H participants are required to participate in the Homeownership Seminars facilitated by Cheshire Housing Trust (CHT), a HUD approved homeownership counseling agency. Participants are required to participate in counseling sessions and financial management workshops. CHT refers participants interested in establishing IDAs to the New Hampshire Community Loan Fund. Participants receive a match from the IDA program up to certain limits for contributions they make to their savings accounts. The money can then be used for eligible homeownership expenses. Cheshire Housing Trust will be exploring methods of continuing a reasonable funding level for the housing counseling program now that the HUD counseling grants have been completely eliminated from the federal budget.

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 coupons.

## Youth Services

The BUILDING BRIDGES program uses several strategies to influence youth development utilizing both family and community to prevent juvenile delinquency. On average about 25 youth are served by the program annually. The program is offered to all family residents living at Harmony Lane and North and Gilsum housing communities; both are Keene Affordable Housing properties operated by the Keene Housing Authority. Historically, a grant through the Division of Children Youth and Families provided funding for the program. This grant was completely eliminated in 2011 and KHA chose to use the flexibility offered through MTW to continue the youth services programming. 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

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 from not only 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.

Daily activities in the youth services program reflect current risks and needs of the participating youth. 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 in the program as volunteers. Middle school age youth are referred to the local MANY Options program by staff; all fees are paid by Keene Housing Authority.

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 workshops at the Family Activity Centers.



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. The Family Activity Center hosts family events, and meals at the activity center are cooked and prepared by youth and parent volunteers.

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.

### **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 IV. Long Term Vision for KHA's Moving to Work Program

KHA's focus in 2011 was reducing vacancy loss after completing the Keene Affordable Housing property renovations in 2011; leasing up 100 non-elderly/disabled coupons; completing capital needs assessments for some of its housing stock and formulating plans to prioritize and address identified needs; and increase the number of affordable housing units in the Monadnock region by coupling Section 8 assistance with other affordable housing programs managed by local non-profit entities.

The ability to create alternatives to the regulations governing project-based coupons has been, and will continue to be, critical in developing and prioritizing partnerships with non-profit housing providers that would otherwise not be feasible or result in conflicting program regulations. Maximizing the impact of its subsidy dollars, project-based coupons are designated in units where rents are already restricted for households with very low to extremely low incomes. We will continue to evolve the Housing Assistance Coupon and use of Section 8 funds to adapt to the housing needs of the region. As an MTW agency, KHA has the ability to request a change in policy, in cooperation with local stakeholders, more expeditiously than policies are changed on a federal level. This allows KHA to adapt more swiftly and efficiently to rapid changes on the local level. Administrative policy revisions in 2012 will include; minimum rent increase from \$50 to \$125; and, changes in required increase in income reporting between re-certifications by assisted households. Security deposits in KAHP properties will reflect the revised minimum rent. KHA will continue to analyze utilization and funding in the Section 8 program to determine if these policy changes, or others, such as changes in payment standards, rent reform, preferences and other initiatives are warranted. The need for Section 8 assistance is far beyond the funds allocated to the Keene Housing Authority. The waiting list reached 7 years in 2010, and remained level in 2011.

Keene Housing Authority's mission supports the integration of services, as a critical component, in the successful management of housing operations. However, with tight operating budgets and limited grants, it has become increasingly difficult to fund services. Determining the level and types of services KHA can offer, while weighing affordability is an ongoing and ever changing process. KHA has been innovative in its partnership with local service agencies but these partnerships often require a monetary contribution or fee for service provided to the participant. Ongoing, staff works on developing sustainability strategies to preserve service coordination for residents and expand it to other Keene Housing Authority owned properties. We are constantly looking for new resources to support this effort. KHA's two Resident Services Coordinator positions will be funded by HUD in 2012 through the Housing Choice Voucher/Family Self Sufficiency grant. The Youth Services Administrator position and programming budget is funded through our MTW allocation since the elimination of the State DCYF grant.

### Keene's Moving to Work Vision

-  Affordability for residents
-  Permanency and availability of housing
-  Flexibility to meet local and changing needs
-  Easily accessed and efficiently delivered services
-  Emphasis on resident self-sufficiency and independent living
-  Collaborative service delivery
-  Green and energy efficient housing

## Section V. Proposed MTW Activities

The Keene Housing Authority is not proposing any new MTW Activities this year.

## Section VI. Ongoing MTW Activities

This section of the plan provides an updated description of ongoing MTW initiatives. Progress on the initiatives is provided in the MTW Annual Report. Keene Housing Authority is not using an outside evaluator for any of its Moving to Work activities. All evaluation and data collection is conducted by program staff. In some instances, baseline data was not initially available and was collected where possible when completing the 2010 MTW Annual Report based on the initiative. KHA implemented its MTW program in 1999 and baseline data was not collected on individual initiatives. The Urban Institute did collect baseline data but Keene does not have access to the data they collected and it was specific to Keene's initiatives. Therefore, it is not accurate to evaluate an initiative based on a baseline collected over a decade into the demonstration program when numerous changes have already occurred. Establishing baselines as of 2005, 2007 or even 2009 are not providing accurate information or a true picture of the changes or impact of an initiative. It is much easier for new programs to establish baselines and comply with the new reporting requirements.

### A. Project-Based Coupons

**Statutory Objective(s):** Increase housing options

**Baseline:** Zero PBC units as of 1/2009.

**Benchmarks:** Lease 60%, currently 352 units, of KHA MTW Allocation with PBCs in KHA owned or managed properties (see Appendix II reflecting approved project based allocation of 50%, or currently 293 units) with PBC by 12/2011. 346 units project-based by 12/2012.

**Measures:** Number of housing units added to PBC inventory; Supplemental measures: Income distribution of Section 8 tenants; Average time spent on the waiting list; Number of coupons issued vs. utilized and reduction of administrative costs.

KHA currently has HUD approval to use up to 60% of its MTW allocation for project based units either owned or managed by the KHA (see chart of properties in Appendix II) or in which KHA is a partner with other organizations. This approval dramatically increased the number of units available for the foreseeable future to the low, very low, and extremely low income tenants the KHA serves.

The ability to determine the policy to select owners and percentage of project-based coupons created an important opportunity for housing authorities in the MTW program to increase the number of affordable housing units in their communities. KHA has designated properties managed by partnerships of which KHA is a part to receive a portion of the project-based coupons. A majority of the project-based coupons have been placed with the Keene Affordable Housing Project. The remaining units will be project-based in other LIHTC properties owned and managed by partnerships of which KHA is a part. Without Coupons, there is a narrow window of applicants who are income eligible for LIHTC programs AND can afford the rent. The ability to project-base coupons provides long-term affordability to a wider range of applicants who qualify for and can afford the housing.

Effective November 1<sup>st</sup> of 2010, KHA project-based the units at Riverbend, Stone Arch Village Senior and Stone Arch Village Family; all three properties are LIHTC with HOME units. All families were provided notice and opportunity to move to a unit on the private market; converting their tenant based MTW Housing Choice Voucher to a Housing Assistance Coupon. Of the 81 units converted to PBCs, only one family chose to move to the private market.

Residents who chose to continue their residency at these properties were notified that all non-elderly/non-disabled households would be integrated into the Resident Self Reliance (RSR) program beginning with re-certifications effective April 1st of 2011. To date, 26 non-elderly/non-disabled families residing in these units have been integrated into the RSR program during their 2011 annual recertification. Subsidy for the RSR families was calculated using the first year formula of VPS-20% GMI. Families leased in January, February and March of 2011 will be integrated into the RSR program as of their 2012 recertification.

Measures for this initiative will be presented in the 2011 MTW Annual Report.

**Data Collection:** Data will be maintained in the Tracker Systems Software which is used to administer all of KHA Section 8 Voucher and Coupon programs.

**Plan Year Implemented:** 2008 Annual Plan

**Authorization (s):** 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 they 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.

Attachment C authorization Section D(1)(e) – The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base, and criteria for expending funds for physical improvements on those units that differs from the percentage and criteria requirements currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8 (o)(13) of the 1937 Act and 24 C.F.R.983 as necessary to implement the Agency's Annual MTW Plan

## **B. Housing Assistance Coupon Program (HAC) Stepped Subsidies**

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**Statutory Objective(s):** Incentive for self-sufficiency; Increase cost effectiveness/efficiency  
**Baseline:** 100% coupon utilization or 359 coupons in 2001. 47% of MTW households were employed in 1999; 29% MTW households exiting program in 2004 evicted for non-payment of rent. Direct staff administrative costs of \$24,500 annually.

**Benchmarks:** 20% Reduction in administration costs; Increase of 15% in share of households working; 10% or less of households exiting the program due to program termination for non-payment of rent

**Measures:** Increase in number of households served and coupons utilized; Increase share of households working; Number of households leaving program due to eviction for non-payment of rent or rent burden; Reduction in administrative costs.

The Keene Housing Authority provides Section 8 Coupon assistance, paid on behalf or directly to the household, in the form of a Housing Assistance Coupon. The HAC can be used to pay for rent in units operated by private landlords. KHA calculates subsidy based on one of two methods; (1) Step subsidy method and (2) Income-based subsidy method. Elderly and disabled households are allowed to choose between participating in the step subsidy method of calculation, which includes required participation in the Resident Self-Reliance Program, or the income-based method of subsidy calculation. All families that do not have an elderly or disabled head of household are required to participate in the Step subsidy method and Resident Self-Reliance Program.

The Step subsidy method provides a flat rate subsidy that is based on unit size and the number of years in the program. The subsidy is gradually reduced over a five year period. The first year's tenant portion of rent is determined by subtracting 20% of gross income (or welfare rent) from the VPS. If, when calculating the first year subsidy, a family's subsidy would be less than the 2<sup>nd</sup> step but more than the 3<sup>rd</sup> step, the subsidy would begin at the 2<sup>nd</sup> step (65% of the VPS) and remain at that step for three years. After 3 years, the subsidy would then drop down to the 3<sup>rd</sup> step (45% of the VPS) for the remaining two years. If the family's subsidy would be less than the 3<sup>rd</sup> step, the subsidy would begin at the 3<sup>rd</sup> step and remain at that step for the full five years. There is a minimum rent of \$125. The second and third step subsidies are based on a percentage of the local Fair Market Rents. Utility rebates are not paid as part of the program as a minimum rent has been established.

**Housing Assistance Coupon Program Subsidies Effective 1/1/2011**

1 <sup>st</sup> Step (1 <sup>st</sup> year)	2 <sup>nd</sup> Step at 65% of FMR (2 <sup>nd</sup> year)	3 <sup>rd</sup> Step at 45% of FMR (4 <sup>th</sup> year)	Bedroom Size
Lower of Welfare rent or VPS - 20% of Gross Income	\$550	\$380	1 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	\$690	\$480	2 Bedroom
Lower of Welfare rent or VPS - 20% of Gross Income	\$840	\$580	3 Bedroom

The subsidy is directly deposited into the family's bank account on the 1<sup>st</sup> of the month. The family is then responsible for paying their rent in full and on time. 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 HCV programs.

Upon entry into the program, landlords are sent letters detailing the family's obligation for paying their rent. In addition, the letter states that if the family does not pay the contract rent in full per the lease agreement, then the landlord should contact Keene Housing Authority who will work with the family to address issues preventing timely payment.

Keene Housing Authority works with families 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 subsidy checks on the first of the month. The option of providing the rental assistance subsidy to the family is also given to the elderly and individuals with disabilities.

Keene has been operating the HAC Step Rent program for over 10 years. As previous reports and data have demonstrated, it has provided incentives for families to move to work. Families who are not working receive a strong incentive to gain employment and take advantage of the employment programs. Since the family portion of rent does not increase in the step subsidy program when their income increases, the family may 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 skills and knowledge to make decisions that best help them achieve their goals. These strategies help the family stabilize and advance their financial and employment base over the next two years before their subsidy is reduced at years two and four of the program.

In 2009 the percentages of the Fair Market Rents upon which the subsidies were based were increased to help residents afford increases in rents and utilities costs by landlords on the private market in Keene's jurisdiction. When Project-Based Coupons were issued to Public Housing tenants in September 2009 in conjunction with the Disposition of Public Housing, all tenants subsidies were calculated as if they were new admissions to the program. This gave families an additional break and almost all families tenant portion of rent was decreased.

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 allows KHA to adapt the program to changing economic circumstances and maximize the use of subsidy while maintaining rent affordability for participants. In 2009, KHA increased the percentage of the FMR on which the step subsidies were based to help offset a rise in rents on the local level. The deeper level of subsidy means fewer families would be served but those being served would remain stable in their housing.

### **Safety Net Program**

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 and during annual certifications and self-certifications to remind housing recipients that they are entitled to apply for assistance.

#### 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 20<sup>th</sup> 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 the Family Obligations Contract that adjusts their rent/subsidy for a specified period.

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. KHA 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 experience gained while participating in a Safety Net job assignment.

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.

**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.*

**Plan Year Implemented:** Original MTW Agreement executed in 1999

**Data Collection:** The information is tracked in the new KHA Tracker software. Information on rents and housing subsidy are tracked in the software. The software, Tracker by Tracker Systems, Inc. provides better reporting and better control of management information than our previous system. The KHA has traditionally monitored rent burdens of active participants over the years to evaluate this initiative. The KHA 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.

**Data Collection:** Safety Net cases are tracked in Excel. They are recorded as applications are received. Information on rents and housing subsidy are tracked in the Tracker Systems software. 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 MTW policies.

## C. Eligibility Administration

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**Statutory Objective(s):** Increase housing options

**Baseline:** 1 household achieved homeownership in 1999. See previous reports for baseline of income for new admissions

**Benchmarks:** 10 households achieving and maintaining homeownership; Maintain 75% of new admissions with incomes at or below the VLI

**Measures:** Number of households achieving homeownership; Number of households in KHA's Section 8 homeownership program; Income distribution of new admissions.

Keene Housing Authority increased program eligibility from 50% to 80% of the AMI in the Section 8 program at the start of its MTW program. Previously, the only program households in the 80% income bracket were eligible for was the Public Housing program. This change in program eligibility expanded the number of programs available for households. When the Section 8 Homeownership program was created in 2006, KHA realized that residents who progressed in the Resident Self-Reliance program and increased their incomes over 80% would be penalized by losing eligibility for the homeownership program. As a result, KHA changed eligibility requirements for this program to permit RSR households who were over 80% to be subsidized at a flat rate for homeownership. Later on, when the economy and housing market becomes unstable, KHA needed to address foreclosure potential among this population of participants. A policy change was added permitting households who entered the program at the flat rate subsidy to request an interim if their income changed. This policy change prevented two households from going into foreclosure.

**Plan Year Implemented:** Original MTW Agreement executed in 1999 for Section 8; 2008 Plan Year for Homeownership program changes

**Data Collection:** Data on new admissions is tracked in the Tracker Systems database. Data can be tracked separately for homeownership and Section 8 participants.

**Authorization(s):** Attachment C Section D.3. Eligibility of Participants - The agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(2) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have otherwise in Section C.I. of the MTW Agreement are met. This authorization waives certain provisions of Sections 16(b) and 8(o) (40 of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW plan.

## D. HQS Inspections

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**Statutory Objective(s):** Increase cost effectiveness/efficiency

**Baseline:** Currently 100% of the units are inspected each year. During 2009, of the 545 units inspected, over 65% passed with no HQS findings. Projected 2011 inspection costs, \$11,772; Projected administrative processing costs \$1,069.

**Benchmarks:** 60% reduction in unit inspection costs  
60% reduction in administrative processing costs for HQS inspections  
100% HQS Compliance for those units exempted from annual inspection requirement  
KHA will calculate the savings by monitoring this initiative and already measures participant and landlord satisfaction with surveys which are part of the annual renewal process.

**Measures:** Number of inspections conducted annually by KHA; Number of units failing HQS QC; Unit inspection costs; processing costs

The approval of the 2011 MTW Plan gave the Keene Housing Authority the ability to change the annual HQS inspection requirement to a biennial HQS inspection requirement for units meeting HQS compliance at the initial or annual inspection conducted in 2011, including KHA owned and managed properties. The initiative is intended to reduce cost and unnecessary administrative burden; as well as reduce the intrusiveness of numerous inspections on the families we serve.

### **Initiative Summary**

The KHA proposed in its 2011 MTW Plan and received approval, to initiate a biennial inspection cycle for any unit inspected either as an initial inspection or an annual inspection which meets HQS compliance. Units which achieve this high bar of compliance are generally of high quality, with property owners attentive to keeping the unit in good condition. The KHA incorporates thorough landlord and tenant HQS education programs and the systems we have in place provide an avenue to quickly address any issues that arise.

KHA sub-contracts services to conduct HQS inspections at the properties it owns and manages. January through September 2011, 94 sub-contracted HQS inspections met the criteria for biennial scheduling; which will result in a savings of at least \$3,290 annually (2011 rate of \$35/inspection). The future cost savings will increase as the cost of inspections increase. Two hundred and thirty six inspections conducted by the KHA inspector (private market) have met the criteria for biennial scheduling, furthering the benefit in administrative savings. Staff time may be reallocated to other tasks furthering opportunity for staff development and maximizing procedural efficiencies.

This initiative has already demonstrated that KHA will significantly reduce the administrative processing and the cost of inspections both internal and in contracted services. By cutting costs, KHA will have more dollars to invest in services. Further, this initiative will improve the quality of life for our residents. Imagine living in a situation where you and your family were subjected to strangers inspecting your unit and asking for the same information several different times a year. We believe that the biennial inspection scheduling is efficient, administratively and monetarily economical, and is less disruptive to our families.

### **Landlord and Tenant Education and Participation in HQS**

The sections below explain the KHA education programs to better inform both landlords and participant families of their responsibilities under HQS. We believe that this is an important support of the proposal to allow HQS inspections every two years in some situations. Well educated consumers will more quickly identify problems with unit quality and be able to address them. We believe that this education program along with the other protections built into the proposal will allow this proposed change in KHA HQS inspections requirements to protect the quality of the units in the KHA program.

#### **Landlord Education and Participation**

When new potential participants are briefed, they are given materials explained below and encouraged to do a walk through inspection with the landlord. Keene Housing Authority conducts initial inspections for all units and encourages new landlords to participate in the initial inspection.

This gives the landlord an opportunity to better understand his or her responsibilities under the HUD HQS. Landlords are encouraged to conduct annual inspections on the units. However, most landlords view inspections as a service, resulting in 7% or 40 units designated as inspected by landlords in 2010. The KHA has always sent the landlord a survey form about the unit called the Landlord Annual Form. As a part of the KHA effort to continually improve the quality of the program, this form has been updated to include the exact same information sent to the participant on HQS standards. That way, the feedback from both the owner and the tenant is based on the same questions and will give KHA a good sense of the quality of the unit.

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 KHA if requested by the participant, landlord or staff. Landlords are encouraged to contact KHA 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 KHA may terminate assistance to a family because of the HQS breach caused by the family.

### **Family Education and Participation in HQS**

KHA 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 Assistance Coupon Program
- Protect Your Family from Lead in Your Home

KHA employees inquire about and discuss HQS during quarterly meetings and monthly contacts. Participants are asked during the Annual Review, about HQS and staff briefly review 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.

KHA will conduct quality control inspections on 5% of units (assuming a lease rate of 98%) to ensure compliance with HQS. The KHA 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.

Every three months, 5% of all units self-inspected by landlords receive a quality control inspection conducted by KHA. 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 specified period and KHA 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 KHA approved extension).

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 Housing Quality Standards and local code requirements.

**Plan Year Implemented:** Original MTW Agreement executed in 1999.

**Data Collection:** Results of quality control inspections are tracked in spreadsheets. 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 I as necessary to implement the Agency's Annual MTW Plan.*

## **E. Standard Deductions**

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**Statutory Objective(s):** Increase cost effectiveness/efficiency

**Baseline:** 100% of eligible households reporting medical or disability expenses require verification. Data on staff time will be provided in 2009 Annual Report. Baseline on new measure won't be available until 2010 report.

**Benchmarks:** 75% Reduction in number of households claiming medical expense deduction higher than standard deduction; 25% Reduction in staff time to process annual certifications

**Measures:** Number of households claiming medical/disability expenses: Reported decrease in processing annual certifications; Difference between reported expenses and expenses provided by the standard deduction.

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 effective 1/1/2010. This deduction includes any qualifying medical, disability

assistance expenses, childcare 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 \$1718. 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 follows the standard procedures for calculating adjusted income, including verification procedures.

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

The verification process consumes a tremendous amount of staff time. By implementing a standard deduction, a large portion of administrative costs is reduced without removing the benefit for a family. If a family 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 tenants' lives. The requirement for a family to track their individual expenses causes a tremendous amount of anxiety on a yearly basis for elderly and disabled families.

KHA has not determined if an adjustment to the standard deduction will be implemented in 2012.

**Plan Year Implemented:** 2006 Annual Plan

**Data Collection:** This information is collected annually during the tenant's certification, whether it is a self-certification or full certification. Keene will monitor, with its Tracker software, 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.

**Authorization(s):** *Attachment C. Section C.11. Rent Policies and Term Limits. The agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The agency is authorized to adopt and implement any reasonable policies for setting rents in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations. The Agency is authorized to adopt and implement term limits for its public housing assistance. Such policies include provisions for addressing hardship cases. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(1) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.6238, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan.*  
*Section D.2 (a) 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 Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan.*

## F. 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.

**Baseline:** 47% households were employed FT in 1999; 56 out of 110 households increased earned income in 2008; 39% households exiting the program in 2005 left because they achieved self-sufficiency

**Benchmarks:** 15% increase in number of households employed; 25% increase in earned income among households reporting no income

**Measures:** Percentage of households employed; Earned income of households

In 2010 KHA modified the Resident Self-Reliance Program participation requirement for non-elderly and disabled families from 5 years to 3 years. KHA has focused on working with families in their first 3 years of the program before they reach the lowest subsidy level. Families wanting to continue after 3 years may do so but on a voluntary basis. Families may be required to participate in RSR activities after 3 years if they enter the Safety Net program. The required RSR activities will be listed as a condition on their Safety Net Contract Amendment.

The first 3 years are most crucial to helping a family address factors affecting their employment and financial stability. Those that continue to have problems paying their rent will likely apply for Safety Net and therefore be required to reenter the program so those who are having difficulty still will receive services. This focuses resources on the households that most need assistance. Keene will monitor the number of households, who, after 3 years, are still not meeting important self sufficiency benchmarks such as maintaining employment, paying their rent on time and rent burdens.

### Initiative Summary

All families participating in the Step 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 families must work on are identified by the RSC and participant working together. In order to be exempt from required activities, families 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 family 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

Families 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

Families 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 his or her ISTP every quarter. The ISTP helps families 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 the 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. The waiver removes certain RSR required activities with the exception of an annual meeting with their RSC to review progress toward their goals. In order to receive the waiver, the family 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 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 advanced 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 families 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.

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.

**Plan Year Implemented:** Original MTW Agreement executed in 1999

**Data Collection:** Data is collected from families during quarterly goal meetings reported on a case management form. The information is then entered into the KHA Housing Tracker database. Since the beginning of the demonstration, the KHA has tracked 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. This information is used by the RSC to evaluate the ability of participants to achieve self-reliance and the obstacles they

may face in reaching the goal. Self-sufficiency is defined as moving to non-subsidized rental on the private market or homeownership, employed and rent burden at 40% or below of the household's income.

**Authorization(s):** *Attachment C Section E. Authorizations Related to Family Self-Sufficiency. The Agency is authorized to operate any of its 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 program size or participation, including whether to establish escrow accounts and other rent incentives and whether to establish mandatory self-sufficiency participation requirements. If the agency receives dedicated funding for an FSS coordinator, such funds must be used to employ a self-sufficiency coordinator. In developing and operating such programs, the Agency is authorized to establish strategic relationships and partnerships with local private and public agencies and service providers to leverage expertise and funding. However, notwithstanding the above, any funds granted pursuant to a competition must be used in accordance with the NOFA and the approved application and work plan. 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.*

## **G. Alternative Recertification Schedule**

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### **Alternative Recertification Schedule**

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**Statutory Objective(s):** Increase cost effectiveness/efficiency

**Baseline:** Estimated baseline of 359 certifications conducted annually in 1999.

**Benchmarks:** 30% reduction in required annual certifications; 15% reduction in coupon administrative costs

**Measures:** Number of certification required under traditional HUD rules vs. MTW rules; Decrease in administrative costs of coupons; Changes in monthly HAP

#### **Introduction**

KHA conducts certifications every 3 years for families in the income-based subsidy program. In the two interim years, KHA recalculates subsidy based on information families provide in self-certifications. This has posed a problem, with mostly elderly and disabled families who are confused about their sources of income and how to report it. To address this, last year KHA proposed and HUD approved a procedure to recalculate subsidy during the interim years by using EIV data to verify available income information in addition to self-certifications. Information not available through EIV is provided by the tenant using the self-certifications. Most tenants in the income based program receive Social Security benefits. Social Security income benefits are calculated by applying the COLA to the previously verified Social Security benefit. Any income derived from assets is self-certified by the residents. KHA continues to reserve the right to verify information if tenant reporting of income is inconsistent or accuracy of information is in question.

Families in the step subsidy program are required to participate in a recertification with every step change and then every 3 years once they reach the final step. During the interim years, families are required to complete self-certifications. Since their rent is not based on income, there is no need to use EIV or supplement the self-certification with other forms of verification, as they have no bearing on the subsidy calculation.

This procedure has diminished confusion and frustration for income-based families during the recertification process and assures that KHA is not utilizing more subsidy than necessary while continuing to provide sufficient subsidy levels for the family. It will also allow a higher percentage of funding to be allocated for coupon subsidy rather than program administration.

This HUD approved change was in response to the change in HUD's regulations for the use of EIV and is not a rent reform activity. Additionally, KHA did not change the way it calculates subsidy, but rather, how we how we verify income information, and KHA did not conduct an impact analysis.

### **Initiative Summary**

Annually Keene Housing Authority reexamines the family characteristics to ensure the family has the correct size coupon. KHA conducts a full recertification of income during the years a family is moving from one Step subsidy level to the next. Once the family 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 certifications 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 complete a self-certification form.

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

Obtaining verification, a large part of the certification process, consumes a tremendous amount of staff time. 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. Families with income-based rents in the MTW program are mostly on fixed incomes. Keene has incorporated EIV and hand delivered documentation into the self-certification process for families in the income-based program. 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.

**Plan Year Implemented:** Amendment No.3 to the MTW original Agreement signed 10/6/2004

**Data Collection:** Keene Housing Authority will track the changes in HAP subsidy administered during the first year of implementation. KHA will also consider other factors that affect changes in subsidy such as rent increases, changes in the VPS and utility allowances etc. It is not be necessary to evaluate the change to this initiative on an ongoing basis once we determine it does result in a cost savings and 2) KHA is simply incorporating already HUD mandated use of the EIV system into its self-certification process for income-based coupons. If a cost savings is not realized, KHA will re-evaluate EIV and the self-certification process for income-based coupons.

**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.*

**Data Collection:** See Initiative Ongoing Eligibility.

## **H. Rent Reasonableness**

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**Statutory Objective(s):** Increase housing options; Increase cost effectiveness/efficiency

**Baseline:** 98% lease-up rate. Less than 5% of households leased with high rent burdens and rents over VPS. 95% of contract rents not exceeding 110% of FMR at lease up. Zero staff time conducting rent reasonableness.

**Benchmarks:** 2010 lease rate will be calculated year end from VMS and will be included in 2010 MTW report. 2010 average rent burdens/contract rents will be monitored and included in the 2010 MTW report. Range of rents and apartment types monitored and will be reported in the 2010 MTW report. Zero staff time in 2011 administering rent reasonableness for MTW assisted households, anticipated 2012 savings of approximately \$4,200.

**Measures:** Number of coupons utilized vs. coupons issued; Number households with high rent burdens and rents over the VPS; Monitor range of rents and apartment types in Section 8 software; reduction in staff time.

Keene Housing Authority removed rent reasonableness as a requirement in the MTW Section 8 program. When approving a unit, potential coupon 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

**Data Collection:** Keene does not conduct rent reasonableness; an exception granted as part of its original MTW agreement. Therefore, Keene does not tabulate the rental data on an annual basis nor does KHA determine if the rents in Keene are appropriate for the Section 8 MTW program. It is up to the household to determine rent reasonableness and select their unit. Keene tracks utilization rate, success rates of tenants issued coupons, reasons tenants do not find housing, and rent burdens.

**Plan Year Implemented:** Original MTW Agreement executed in 1999.

*Authorization(s): Attachment C Section 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 24 C.F.R. 982.507 as necessary to implement the Agency's Annual MTW Plan*

## **I. Restrictions on Section 8 Portability**

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**Statutory Objective(s):** Increase cost effectiveness/efficiency

**Baseline:** 4 ports annually; \$50,000 annually in HAP expense; \$400 annually in direct staff expense.

**Benchmarks:** Less than 5% of funds spent on ports.

**Measures:** Number and dollar amount of coupons utilized locally vs. administered through ports.

In 2009 KHA stopped absorbing ports from other PHAs. As part of MTW, KHA has always had restrictions on ports but no baseline data is available on the numbers of ports administered before the initiative was implemented. Keene has submitted data on ports to VMS for 2009 and included it as its baseline number. In order to measure this initiative, Keene would need to know the number of ports it would have administered if they were permitted. Since households are aware of this policy, and may not request portability as a result of the policy, it is unlikely KHA could estimate the number of ports it would administer if they were permitted. Therefore, KHA will track the value of dollars lost for the ports it does administer. Keene's main reason for restricting ports with the exception of those requested by reasonable accommodation or due to domestic violence, is to keep coupon funding in the Keene community for use by those who intend to live in the Monadnock region.

**Data Collection:** Ports are tracked in the Tracker software. To date there has been one reasonable accommodation request to port and one request to port due to domestic violence, both were approved.

**Plan Year Implemented:** 2008 Annual Plan

**Authorization(s):** 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(r) of the 1937 Act and 24 C.F.R. 982 subpart H as necessary to implement the Agency's Annual Plan.

## Section VII. Sources and Uses of Funding

### A. Planned Sources & Uses for Section 8

The Keene Housing Authority receives funding for 587 Section 8 coupons under its MTW plan, 50 Mainstream vouchers, and 100 Non-Elderly Disabled coupons. Consistent with the 2011 plan, the budget for the 2012 Section 8 block grant funding is based on the assumption of level funding at the 2011 final calculation.

The 2012 Sources for the Non-Elderly Disabled Coupons projects an administrative fee based on the assumption of the 2011 administrative fee rate.

The Keene Housing Authority has been awarded \$131,198 for the FY2011 Housing Choice Vouchers Family Self-Sufficiency (FSS) Coordinator Program. This award supports two (2) Resident Services Coordinator positions with funding ending December 31, 2012.

SOURCES	2012 Budget MTW Coupons	2012 Budget Mainstream Vouchers NON MTW	2012 Budget Non-Elderly Disabled Coupons NON MTW	Total Budget 2012
Section 8 Funds	\$5,174,056	\$373,168	\$982,224	\$6,529,448
HCV-FSS	\$131,198			\$131,198
Interest Income	\$1,700	\$400	\$600	\$2,700
Other Income				
<b>TOTAL SOURCES</b>	<b>\$5,306,954</b>	<b>\$373,568</b>	<b>\$982,824</b>	<b>\$6,663,346</b>
<b>USES</b>				
Audit Fees	\$20,000	\$1,000	\$1,000	\$22,000
Office Expenses	\$250,000	\$7,968	\$24,536	\$282,504
Salaries - Admin	\$400,000	\$11,000	\$2,000	\$413,000
Salaries - Programs & Services	\$517,138	\$34,000	\$79,000	\$630,138
Tenant Services	\$20,000			\$20,000
Other Expense				
<b>Total Administrative Expenses</b>	<b>\$1,207,138</b>	<b>\$53,968</b>	<b>\$106,536</b>	<b>\$1,37,642</b>
<b>HAPs Disbursed</b>	<b>\$4,099,816</b>	<b>\$319,600</b>	<b>\$876,288</b>	<b>\$5,295,704</b>
<b>TOTAL USES</b>	<b>\$5,306,954</b>	<b>\$373,568</b>	<b>\$982,824</b>	<b>\$6,663,346</b>

**B. State and Local Funding**

The Keene Housing Authority has not been awarded any state or local grants for 2012.

**C. Planned Sources and Uses of COCC**

Not applicable.

**D. Use of Single Fund Flexibility**

As a result of the sale of public housing in 2009, single fund flexibility is no longer applicable to the Keene Housing Authority.

## **Section VIII. Administrative**

### **Public Hearing Documentation**

The advertisement and minutes of the Public Hearing are contained in Appendix V.

### **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 2012.

Keene will be working on identifying new measures for its initiatives and tools to collect and evaluate the data. New Section 8 software will aid in KHA's ability to extract and evaluate data relative to the demonstration. 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. The perception of MTW 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.

## Appendix I KHA Properties Oversight

Name of Property and Address	Type(s) of Inspection(s) for the Property
<p>Stone Arch Village Family and Senior Housing 823 -827 &amp; 829 Court Street Keene NH 03431</p>	<p>New Hampshire Housing Finance Authority (NHHFA) Program Management Review</p> <p>Northern New England Housing Investment Fund (NNEIHF) Management Review</p> <p>New Hampshire Housing Finance Authority (NHHFA) Home Program Management Review (Stone Arch Senior Housing)</p> <p>Keene Housing Authority – Quality Control Inspections</p>
<p>Evergreen Knoll 851 West Swanzey Road Swanzey NH 03446</p>	<p>New Hampshire Housing Finance Authority (NHHFA) Management Review</p> <p>United States Department of Agriculture Rural Development</p> <p>New Hampshire Housing Finance Authority (NHHFA) Home Program Management Review</p> <p>Northern New England Housing Investment Fund (NNEIHF) Management Review</p> <p>Keene Housing Authority – Quality Control Inspections</p>
<p>Riverbend Apartments 836 West Swanzey Road Swanzey NH 03446</p>	<p>New Hampshire Housing Finance Authority (NHHFA) Management Review</p> <p>Boston Capital - Asset Manager</p> <p>New Hampshire Housing Finance Authority (NHHFA) Home Program Management Review</p> <p>Keene Housing Authority – Quality Control Inspections</p>

Name of Property and Address	Type(s) of Inspection(s) for the Property
Central Square Terrace 5 Central Square Terrace Keene, NH 03431	New Hampshire Housing Finance Authority (NHHFA) Management Review  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
Meadow Road 72 - 76 Meadow Road Keene, NH 03431	New Hampshire Housing Finance Authority (NHHFA) Management Review  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
Wedgewood Duplexes Wedgewood Drive Winchester, NH 03470	New Hampshire Housing Finance Authority (NHHFA) Management Review  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
<b>Notes for Central Square Terrace, Meadow Road and Wedgewood Duplexes</b> – These properties are Multi-Family New Construction - Project-Based Section 8.	
Elm City Co-Op 71-75 Cottage Street Keene, NH 03431	New Hampshire Housing Finance Authority (NHHFA) Management Review  Keene Housing Authority – Quality Control Inspections

## Keene Affordable Housing

*The properties below are former KHA public housing complexes which are now owned by Monadnock Affordable Housing Corporation, a wholly owned subsidiary of the Keene Housing Authority. All of these complexes were totally rehabilitated in the past year. They are inspected by a third party vendor with no interest in the property. KHA is proposing that they be treated like any other property in the program, that is, if they are 100% HQS Compliant, the next inspection will be scheduled for two years rather than one year.*

Name of Property and Address	Type(s) of Inspection(s) for the Property
Harper Acres Castle Street Keene, NH 03431	HQS - Initial and Annual  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
Harmony Lane Harmony Lane Keene, NH 03431	HQS - Initial and Annual  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
North and Gilsum North and Gilsum Streets Keene, NH 03431	HQS - Initial and Annual  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections

Name of Property and Address	Type(s) of Inspection(s) for the Property
Scattered Sites Roxbury Court Water Street West Street Damon Court Base Hill Road Keene, NH 03431	HQS - Initial and Annual  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections
Bennett Block 32 Washington Street Keene, NH 03431	HQS - Initial and Annual  Independent Contractor Threshold Home Inspection, LLC POB 63 165 Main Street Harrisville, NH 03450  Keene Housing Authority – Quality Control Inspections

## Appendix II - Properties with Project-Based Coupons

Property	Number of Units/Coupons	Housing Type	Description
Harper Acres	112	Family	Walk-up garden style buildings with studio, 1 and 2 bedroom units.
Bennett Block	14	Family	A 3 story building with elevator access with studio, 1 and 2 bedroom units.
Harmony Lane	38	Family	Townhouse style buildings with 2 and 3 bedroom units.
North/Gilsum	29	Family	Townhouse style buildings with 3 and 4 bedroom units.
Scattered Sites	18	Family	Four family homes scattered throughout Keene with 1, 2 and 3 bedroom units.
32 Water St. (Family Shelter)	2	Family	Emergency Shelter
Riverbend	24	Family	Row/townhouse style buildings with 2 and 3 bedroom units.
Stone Arch Village Family	24	Family	Townhouse style buildings with 2 and 3 bedroom units.
Stone Arch Village Senior	33	Senior	A 3 story building with elevator access with 1 and 2 bedroom units.
<b>Total as of 12/2011</b>	<b>294 (50% of MTW allocated units)</b>		
<b>Project base in 2012</b>			
Evergreen Knoll	3 (currently MTW HCV)	Family	Row/townhouse style buildings with 2 and 3 bedroom units
Cottage Street	3	Disabled/Services with designated service provider	Row house style building with 2 and 3 bedroom units.
Brookbend	21	Family	2 -3 BR townhouse units
<b>Total Project Based as of 12/2012</b>	<b>321</b>		

**Appendix III Moving to Work Evaluation Template: Keene's Major Initiatives**

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics
Determination of percentage and process for Project Basing Housing Assistance Coupons	Increase housing options	Increase availability, quantity and quality of assisted housing	Zero units of PBCs on 1/1/2009. Supplemental Measures: income distribution of Section 8 tenants (See report for baseline); Average time spent on waiting list (baseline will be established when lease-up resumed). Number of coupons issued vs. utilized (baseline will be established when issuance resumes)	213 units of PBCs by 12/31/2010 Income distribution of Section 8 tenants; Average time spent on waiting list; Number of coupons issued vs. utilized	Number of housing units added to PBC inventory; <i>Supplemental Measures:</i> Income distribution of Section 8 tenants; Average time spent on waiting list; Number of coupons issued vs. utilized
Housing Assistance Coupon	Incentive for self-sufficiency; Increase cost effectiveness/efficiency	Provide incentives for families to move to work; Reduce administrative burden for KHA and reporting requirements for participants	100% Coupons utilized in 2001. 47% of MTW households employed in 1999. 29% MTW households exiting program in 2004 evicted for non-payment of rent. \$617 average HAP as of 12/2009.	Increase in 15% of Coupons utilized; Increase of 15% in number of households working within first 5 years of demonstration; 20% or less of households evicted due to non-payment of rent annually	Increase in percentage of coupons utilized; Percentage of households working; Number of households evicted due to non-payment of rent and their rent burden. Average dollar amount of HAP paid per Coupon.
Eligibility Administration for Section 8 and Homeownership Programs	Increase housing options	Increase number of households moving to homeownership; Provide increased housing choices for applicants	1 household achieved homeownership in 1999; 100% of applicants lease-up after issuance in 2009. 100 private landlords and 7 waiting lists for the Section 8 program	10 households active in KHA's homeownership program by 4/2008; 95% of applicants lease up after issuance on an annual basis	Number of households in KHA's Section 8 homeownership program; Percentage of applicants issued Coupons who lease up in Section 8 program

**Appendix III Moving to Work Evaluation Template: Keene's Major Initiatives**

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics
<p>HQS Initiative: Landlord Option to Self-certify HQS. Biennial inspections for 100% Pass status on initial or annual HQS</p>	<p>Increase cost effectiveness/efficiency</p>	<p>Reduce number of required HQS inspections. Reduce number of duplicative inspections.</p>	<p>100% HQS inspections conducted by KHA in 2001. 0% conducted by Landlords in 2001. 130 units failed initial HQS Inspection in 2009 with 0 resulting in subsidy abatements 100% HQS inspections conducted in 2009. 65% passed with no findings.</p>	<p>75% reduction in HQS inspections conducted by KHA staff within first year of demonstration. Number of units failing HQS in a fiscal year resulting in subsidy abatement. 60% reduction in unit inspection costs realized in 2012. Reduction in administrative processing costs. 100% HQS compliance for units on biennial schedule.</p>	<p>Percentage of HQS inspections conducted by the landlord vs. KHA staff. Number of units failing HQS Number of inspections conducted by KHA staff and contracted services.</p>
<p>Standard Deductions</p>	<p>Increase cost effectiveness/efficiency</p>	<p>Reduce administrative burden and reporting requirements for residents</p>	<p>Percentage of eligible households receiving the standard medical/disability expense deduction. Baseline will need to be established in 2010. Baseline in number of hrs saved TBA</p>	<p>75% of households receive standard deduction within a fiscal year. Number of staff time verifying expenses saved per year per household</p>	<p>Percentage of households receiving the standard deduction. Staff time saved.</p>
<p>Resident Self-Reliance Program</p>	<p>Give incentives to families with children to obtain employment and self-sufficiency</p>	<p>Increase number of families working; Increase share of residents making progress toward self-sufficiency</p>	<p>47% of households employed full-time in 10/1999; 51% of households increased their earned income in 2008 (% of increase over 5 yr period baseline will be established in 2010);</p>	<p>15 % increase in number of households employed; 75% of households increase their earned income (by 25% over a 5 year period). 75% of households leaving the program over the</p>	<p>Number of households employed; Earned income of households; Reasons participants leave the program</p>

**Appendix III Moving to Work Evaluation Template: Keene's Major Initiatives**

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics
			39% households exiting the program achieved self-sufficiency in 2005	course of the demonstration due to achievement of self-sufficiency competencies	
Alternative Recertification Schedule	Increase cost effectiveness/efficiency	Reduce administrative burden	Estimated baseline of 359 certifications conducted annually in 1999. Staff time spent on annual recertifications (baseline in 2010) Reduction in coupon administrative costs per HAP (baseline in 2010)	30% reduction in number of required full recertifications on an annual basis; 50% reduction in staff time spent on annual recertifications. 25% reduction in coupon administrative costs per HAP	Number of full recertifications conducted annually; Staff time; Changes in administrative costs per HAP on a monthly basis
Rent Reasonableness	Increase housing options; Increase cost effectiveness/efficiency	Reduce administrative burden; Reduce barriers for tenants leasing up in Section 8	1 hr of staff time allocated to creating a Rent Reasonableness Table in 2009 (adopt NHHFA's table) Percentage of household receiving exemption to lease-up with rents over 40% of their gross monthly income (new measure in 2010)	100% reduction in staff time on rent reasonableness for MTW coupons on an annual basis  Less than 25% of households lease-up with rent over 40% of gross monthly income	Staff time spent on rent reasonableness charts annually; Number of households with rent burdens over 40% at initial lease-up
Restrictions on Section 8 Portability	Increase cost effectiveness/efficiency	Preserve ability to administer coupons locally	Less than 1% of coupons were issued as ports as of 12/31/2009; Average HAP of \$373 paid per port	Less than 5% of coupons paid as ports; Average HAP cost per port on a monthly basis.	Number of ports paid. Average HAP paid per port.



The KHA serves:  
Families and Children  
Seniors  
Persons with Disabilities

P. Curtis Hiebert  
Executive Director

# Keene Housing Authority

*Providing affordable housing in the Monadnock Region.*

831 Court Street  
Keene, NH 03431  
Phone & TDD: (603) 352-6161  
Fax: (603) 352-6845

## Keene Housing Authority

### Resolution 439

### Adopt 2012 Moving To Work Plan

RESOLVED, November 3, 2011 that the Keene Housing Authority Board of Commissioners approve and adopt the Annual Moving To Work Plan for 2012, as required by Amendment #2, to the Keene Housing Authority Moving To Work Agreement.

Adoption of this 2012 MTW Plan includes approval of the policy changes as outlined below:

**No proposed changes.**

The Board certifies compliance with the regulations as outlined in Attachment B of the 2012 MTW Plan.

Motion to Adopt: Commissioner Tom Moses

Motion Seconded By: Commissioner Lee Robator

Resolution Passed On November 3, 2011

## **Appendix V – Notice of Public Hearing and Comment Period**

### **PUBLIC NOTICE**

The Keene Housing Authority is preparing its 2012 Moving to Work Annual Plan in compliance with its Moving to Work Agreement. The Plan applies to the Section 8 Housing Assistance Coupon program and the Moving to Work portion of the program only applies to families. Elderly and disabled households are waived from the Moving to Work program requirements. Proposed changes to the plan include:

**No proposed changes in 2012.**

A draft will be available for review at the Authority's Office located at 831 Court Street, Keene, starting September 12, 2011 to October 12, 2011. The Authority's hours of operation are 8:30 a.m. to 4:30 p.m. The plan will also be available electronically by sending a request to [callen@kha.org](mailto:callen@kha.org). The electronic request should include the name, address and phone number of the person making the request and the organization represented, if any. In addition, a public hearing will be held on October 4, 2011, at Stone Arch Village Senior Housing Community Room, 833 Court Street, Keene, NH, at 2:00 pm. Everyone is invited to attend and provide comment. Additionally, written comments will be received from any interested parties up to October 12, 2011.

**Keene Housing Authority**  
**Minutes of the Public Hearing on the 2012 MTW Plan**  
**Held on October 4, 2011 at 2:00 p.m.**  
**Ms. Denise Pratt, Manager of Programs and Services Presiding**

**The Hearing was called to order by Denise Pratt, Manager of Programs and Services for the Keene Housing Authority.**

**Present were: Denise Pratt and Carl Allen from the KHA staff.**

**No one else attended the hearing.**

**There were no written comments during the 30 day comment period which was published in the Keene Sentinel on September 10 and 11, 2011. Further there were no phone calls to or personal visits to the Keene Housing Authority to request information or ask questions during that same 20 day period. A copy of the public notice is attached on the page immediately preceding these minutes.**

**Ms. Pratt held the hearing open for 15 minutes to be sure there were no late arrivals.**

**Ms. Pratt adjourned the hearing at 2:15 p.m.**

# Attachment B

Certification of Compliance

**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 January 1, 2012, 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 published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA 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.

OMB Control Number: 2577-0216

Expiration Date: 12/31/2011

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 PHA

NH010  
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)

Christopher Coates  
Name of Authorized Official

Board Chair  
Title

Signature

10-11-11

## Attachment B

Annual Plan	Annual Report
<p><b>I. Households Served</b></p> <p>A. Number and characteristic of households served at beginning of period, by:</p> <ul style="list-style-type: none"> <li>- Unit size</li> <li>- Family type (family vs. elderly or disabled)</li> <li>- Income group (&lt;30; 30-50; 50-80; &gt;80)</li> <li>- Housing type (LRPH; leased, other)</li> <li>- Race &amp; ethnicity</li> </ul> <p>B. Identify number and characteristic of households on waiting lists (all housing types). Discuss waiting list issues and proposed actions</p> <p>C. Number projected to be served at end of period</p> <p>D. Narrative discussion/explanation of change</p>	<p><b>I. Households Served</b></p> <p>A. Number Served: Plan vs actual by:</p> <ul style="list-style-type: none"> <li>- Unit size</li> <li>- Family type</li> <li>- Income group</li> <li>- Program/housing type</li> <li>- Race/ethnicity</li> </ul> <p>B. Changes in tenant characteristics</p> <p>C. Changes in waiting list numbers and characteristics</p> <p>D. Narrative discussion/explanation of difference</p>
<p><b>II Occupancy Policies</b></p> <p>A. Statement of policies governing eligibility, selection, admissions, assignment, and occupancy of families, including the admissions policy under section 16(a)(3)(B) for deconcentration of lower-income families</p> <p>B. Statement of Rent Policy</p>	<p><b>II. Occupancy Policies</b></p> <p>A. Changes in concentration of lower-income families, by program</p> <p>B. Changes in Rent Policy, if any</p> <p>C. Narrative discussion/explanation of change</p>
<p><b>III. Changes in the Housing Stock</b></p> <p>A. Number of units in inventory at beginning of period by program (LRHP, leased, other)</p> <p>B. Projected number at end of period by program</p>	<p><b>III. Changes in the Housing Stock</b></p> <p>I. Number of units in inventory by program: planned vs. actual</p> <p>B. Narrative discussion/explanation of the difference</p>

<p><b>IV. Sources and Amounts of Funding</b></p> <p>A. Identify/discuss all sources and amounts of funding included in consolidated budget statement.</p> <p>B. Identify/discuss sources, amounts and planned uses of special purposed funds outside the consolidated budget (e.g., DEG)</p> <p>C. Consolidated Budget Statement</p>	<p><b>IV. Sources and Amounts of Funding</b></p> <p>A. Panned vs. actual funding amounts</p> <p>B. Narrative discussions/explanation of difference</p> <p>C. Consolidated Financial Statement</p>
<p><b>V. Uses of funds</b></p> <p>A. Previous year expenditures by line item</p> <p>B. Planned expenditures by line item</p> <p>C. Description of proposed activities/investments by line item/explanation of change from previously approved plan</p> <p>D. Reserve balance at beginning of year. Discuss adequacy of reserves</p>	<p><b>V. Uses of funds</b></p> <p>A. Budgeted vs. actual expenditures by line item</p> <p>B. Narrative/explanation of difference</p> <p>C. Reserve balance at end of year. Discuss adequacy of reserves</p>
<p><b>VI. Management Information for Owned/Managed Units</b></p>	
<p><b>A. Vacancy Rates</b></p> <p>1. Vacancy rates by property beginning of period</p> <p>2. Narrative: Issues and proposed actions</p> <p>3. Target Rates by Property at end of period</p>	<p><b>A. Vacancy Rates</b></p> <p>1. Target vs. actual vacancies by property</p> <p>2. Narrative/explanation of difference</p>
<p><b>B. Work Orders</b></p> <p>1. Response rates beginning of period</p> <ul style="list-style-type: none"> <li>• % emergency within 24 hours</li> <li>• % regular within 30 days</li> </ul> <p>2. Narrative issues and proposed actions</p> <p>3. Target rates at end of period</p>	<p><b>B. Work Orders</b></p> <p>1. Target vs. actual response rates</p> <p>2. Narrative/explanation of difference</p>

<p><b>C. Inspections</b></p> <ol style="list-style-type: none"> <li>1. Description of inspection strategy</li> <li>2. Planned inspections (% of this FY)</li> </ol>	<p><b>D. Inspections</b></p> <ol style="list-style-type: none"> <li>1. Planned vs. actual inspections completed</li> <li>2. Narrative/discussion of difference</li> <li>3. Results of independent PHA's Inspections</li> </ol>
<p><b>D. Security</b></p> <ol style="list-style-type: none"> <li>1. Narrative: security issues and proposed actions</li> </ol>	<p><b>E. Security</b></p> <ol style="list-style-type: none"> <li>1. Narrative: Planned vs. actual actions/ explanation of difference</li> </ol>
<p><b>VII. Management Information for Leased Housing</b></p>	
<p><b>A. Leasing Information</b></p> <ol style="list-style-type: none"> <li>1. Units under lease (%) beginning of period</li> <li>2. Target Lease up rate at end of period</li> <li>3. Plans regarding: <ul style="list-style-type: none"> <li>• Ensuring rent reasonableness</li> <li>• Expanding housing opportunities</li> <li>• Deconcentration of low-income families</li> </ul> </li> <li>4. Issues and proposed actions</li> </ol>	<p><b>A. Leasing Information</b></p> <ol style="list-style-type: none"> <li>1. Target vs. actual lease ups at end of period</li> <li>2. Information and Certification of Data on Leased Housing Management, including: <ul style="list-style-type: none"> <li>• Ensuring rent reasonableness</li> <li>• Expanding housing opportunities</li> <li>• Deconcentration of low-income families</li> </ul> </li> <li>3. Narrative/explanation of difference</li> </ol>
<p><b>B. Inspection Strategy</b></p> <ol style="list-style-type: none"> <li>1. Description of inspection strategy, including: <ol style="list-style-type: none"> <li>a. Planned inspections completed (% this FY) by category: <ul style="list-style-type: none"> <li>• Annual HQS inspections</li> <li>• Pre-contract Inspections</li> <li>• HQS Quality Control Inspections</li> </ul> </li> <li>b. HQS Enforcement</li> </ol> </li> </ol>	<p><b>C. Inspection Strategy</b></p> <ol style="list-style-type: none"> <li>1. Description of strategy, including: <ol style="list-style-type: none"> <li>a. Planned vs. actual inspections by category: <ul style="list-style-type: none"> <li>• Annual HQS inspections</li> <li>• Pre-contract Inspections</li> <li>• HQS Quality Control Inspections</li> </ul> </li> <li>b. HQS Enforcement</li> </ol> </li> <li>2. Narrative/discussion of the difference</li> </ol>

<p><b>VIII. Resident Programs</b></p> <ol style="list-style-type: none"> <li>1. Description of activities</li> <li>2. Issues and proposed actions</li> </ol>	<p><b>IX. Resident Programs</b></p> <ol style="list-style-type: none"> <li>1. Narrative: panned vs. actual actions/ explanation of difference</li> <li>2. Results of latest PHAs Resident Survey or equivalent as determined by HUD.</li> </ol>
<p><b>X. Other Information As Required by HUD</b></p>	
<ol style="list-style-type: none"> <li>A. Board Resolution <ul style="list-style-type: none"> <li>• Adopting Plan</li> <li>• Certifying that Public Hearing Requirements were met</li> </ul> </li> <li>B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement</li> <li>C. Submissions required for the receipt of funds</li> </ol>	<ol style="list-style-type: none"> <li>A. Results of the latest completed 133 Audit (including program specific OMB compliance supplement items, as applicable to the HA's Agreement</li> <li>B. Required Certifications and other submissions from which the Agency is not exempted by the MTW Agreement</li> <li>C. Submissions required for the receipt of funds.</li> </ol>