

2017 MTW Annual Plan

Keene Housing



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Section I.

Introduction

Moving to Work (MTW) is a Department of Housing and Urban Development (HUD) deregulation demonstration that offers a select group of high-performing public housing authorities (PHAs) opportunities to design and test innovative, locally responsive housing and self-sufficiency strategies for low income families by providing MTW PHAs exemptions from many of the regulations ordinarily imposed upon PHAs. The program also permits PHAs to “de-silo” its funding streams by combining them into a single agency-wide pool.

Keene Housing (KH) entered into its first MTW agreement with HUD in 1999 as part of the original MTW cohort. This agreement was extended to 2018 in 2008. In December 2016, KH secured a second, ten-year extension of our agreement through 2028, providing a long horizon to implement, test, and assess new initiatives and approaches to our work in support of the MTW program’s goals.

The purposes of the MTW program are to give PHAs and HUD the flexibility to design and test various approaches for providing and administering housing assistance that accomplishes three primary goals:

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

While the goals of the MTW program are admirable, our experience shows that pursuit of these goals in of themselves fails to adequately address the consequences of past decisions made by policymakers on those living in poverty. Without highlighting the important link between policy making and the individual, it’s easy to continue developing policy interventions that are inconsistent with on-the-ground realities, such as the connection between employment security and the need for access to affordable childcare. KH’s Guiding Principles reflect a person-first approach to policy development that, in partnership with the MTW program’s statutory goals, provide the framework around which we do our work.

- **Choice** — Provide every household we serve a variety of opportunities to meet their unique needs while pursuing opportunities for developing, on our own or in partnership with others, new affordable housing.

- **Collaboration** — Create a spirit of collaboration which links Keene Housing, KH-assisted households, local organizations, and the public into a healthier, more resilient, more supportive community.
- **Independence** — Provide residents the supports they need to best manage their lives and attain the life goals they set for themselves – being sensitive to the fact that, for each of us, “success” is relative. Success for one households may be the purchase of a home while for another it may simply mean having a safe, affordable home in which to comfortably grow old.

During our time in MTW we have been proud to be a part of an amazing group of PHAs dedicated to finding new ways to improve the lives of low-income families with the resources entrusted to us by tax payers. Along with our extension came the promise of adding 100 new agencies to the MTW family, a decision we whole-heartedly support and look towards with anticipation.

Overview of the Agency’s Long-Term MTW Goals and Objectives

The 2015-2020 Strategic Plan provides a framework for our long-term goals and objectives. The Strategic Plan outlines 11 individual goals which can be summarized as; reducing costs, increasing the economic independence of our participants, and increasing the availability of affordable housing in the Monadnock region. A few of the larger projects currently in progress or under consideration include:

- Continuing to preserve, maintain and improve Keene Housing’s existing housing portfolio – Many of our properties face significant capital needs. With the help of MTW funding and our Affordable Housing Preservation and Modernization activity we are steadily making gains on those needs, investing over a million dollars a year into our portfolio since the Affordable Housing Preservation and Modernization activity was approved.
- Preserve and expand the Monadnock region’s affordable housing stock – With the preservation of Meadow Road using the Affordable Housing Preservation Program (AHPP) complete, we are assessing other opportunities to help preserve affordable units using AHPP. In addition, market analyses show the region has a crucial unmet need for new low-income units for our elderly and disabled populations.
- Promote Energy Conservation and Sustainability – In 2015, KH joined the Better Building Challenge. Better Buildings is a partnership between the Department of Energy and leaders in the public and private sectors to reduce the nation’s energy consumption through advancing energy efficiency investment and sharing of best

practices. As a Better Buildings Challenge partner, we have committed to reducing our energy and water usage by 10% by 2025.

This commitment is pushing us to rapidly reduce energy consumption, thereby reducing our energy costs and our environmental impact. As of 2016, we are actively researching alternative energy projects, have taken steps towards resident and staff engagement around energy savings, and are piloting a new heating system to replace aging, inefficient heaters in our former public housing units.

- Foster innovation through the Moving to Work program – While it goes without saying that KH is always looking for ways to improve upon our existing programs, we believe that the possibilities for innovation are endless. With our status as an MTW agency secured well into the next decade, we look forward to assessing every aspect of our business and pursuing every opportunity that presents itself.

Overview of the Agency's MTW Goals and Objectives for 2017

We continue utilizing our flexibilities to explore new ways of supporting low-income families, keeping in mind that not each person or family has the same needs. For example, our Resident Self-Reliance program provides non-elderly, non-disabled participants access to the supports and resources necessary to maintain employment and move towards economic independence. The Kids Housing Kids Collaborative (KHKC) provides KH youth access to the same social, academic, and athletic programs as their higher-income peers in hoping of reducing the achievement gap that often limits low-income children's socio-economic prospects. The combined Transitional Housing Assistance Program (THASP) and newest initiative, Project MARCH (Monadnock Area Resources Curing Homelessness) ensures that the region's homeless have access to safe temporary and permanent housing opportunities. Each of these activities relies on our MTW authority to not only for their existence but to be tailored to the targeted population's specific needs.

This year we are proposing formalizing an existing policy as a new MTW activity. The Project Based Voucher Mobility Wait List activity changes to how and when PBV households access tenant-based vouchers with the goal of ensuring that those being assisted remain so, while expanding the number of new households can serve.

In addition to our new activity, we are also proposing a minor change to our Project Based Voucher and \$0 HAP Rent Burden Test activities. The PBV change is an important step to expand our use of PBVs to leverage funding for the development of additional, permanently affordable housing. The \$0 HAP change ensures that all households receiving housing assistance are held to the same definition of economic self-sufficiency.

Section II.

General Operating Information

Keene Housing owns or manages 551 units of affordable housing including two homeless shelters, 90 units under a HUD Multifamily Project Based Section 8 contract, six Low Income Housing Tax Credit (LIHTC) properties, two homes for chronically mentally ill, and ten former public housing developments.

MTW flexibilities have allowed us to re-imagine how a PHA can develop and manage its housing portfolio. In 2007 KH got out of the public housing business by converting its entire public housing portfolio to conventional financing with MTW Project-Based Vouchers (PBVs). The conversion protected this important community resource from the slow decay caused by years of federal disinvestment in public housing. In addition, many of our LIHTC properties include MTW PBV subsidies. The deep subsidy the PBVs provide expands the housing available to extremely low-income households who could not otherwise afford LIHTC rents. Our homeless shelters utilize shallow subsidies provided through our Transitional Housing Assistance Subsidy Program (THASP) and the Affordable Housing Preservation Program (AHPP) allows us to preserve the affordability of eighteen expired Project-Based Section 8 units at Meadow Road. For a clearer picture of which units benefit from our participation in MTW, please see the table provided on page 12.

Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year

KH does not intend to add any public housing units to our portfolio in 2017.

AMP Name and Number	Bedroom Size							Total Units	Population Type *	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
N/A	0	0	0	0	0	0	0	0	N/A	0	0
Total Public Housing Units to be Added								0			

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other
 If Other, please describe: N/A
 If Other, please describe: N/A

Planned Public Housing Units to be Removed During the Fiscal Year

KH does not own any public housing units.

PIC Dev. #/Amp and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
N/A	0	N/A
Total Public Housing Units to be Removed	0	

New Housing Choice Vouchers to be Project-based During the Fiscal Year

Property Name	Anticipated Number of New Vouchers to be Project-Based*	Description of Project
N/A	0	N/A
Anticipated Total New Vouchers to be Project-based*	0	Anticipated Total Number of PBVs Committed at the End of the Fiscal Year 339 Anticipated Total Number of PBVs Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year 330

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year

KH does not anticipate any other changes to our housing stock in FY2017.

General Description of All Planned Capital Fund Expenditures During the Plan Year

KH does not have any public housing units and is ineligible for Capital Funds at this time.



Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	0	0
Federal MTW Voucher (HCV) Units to be Utilized	587	7044
Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	62	744
Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	20	240
Total Households Projected to be Served	669	8028

* Calculated by dividing the planned number of unit months occupied/leased by 12.

** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

Keene Housing is in compliance with all statutory MTW requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Voucher, and/or Local Non-Traditional Units and Possible Solutions

KH does not anticipate any issues relating to leasing in any of its MTW programs for FY2017.

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
N/A	N/A

Wait List Information

Housing Programs(s) *	Wait List Type **	Number of Households on Wait List	Waitlist Open, Partially Open, or Closed***	Are There Plans to Open the wait List During the Fiscal Year?
Federal MTW HCV Units (Tenant Based)	Community-Wide	331	Open	N/A
Federal MTW HCV Units (Tenant Based)	Program Specific (PBV Mobility)	76	Partially Opened	No
Federal MTW HCV Units (Tenant Based)	Program Specific (NED)	177	Open	N/A
Federal Non-MTW HCV Units	Program Specific (Mainstream)	177	Open	N/A
Federal MTW HCV Units (Project Based)	Site-based (Unduplicated)	605	Open	N/A

* Select Housing Program: Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** Select Wait List Types: Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

The PBV Mobility Waitlist is only available to households leased up in a PBV unit interested in obtaining a tenant-based voucher.

If Local, Non-Traditional Housing Program, please describe: N/A

If Other Wait List Type, please describe: N/A

Keene Housing Owned and Managed Portfolio

	Units	Population	Subsidy	MTW
Main Developments (Former Public Housing)				
Keene Affordable Housing Properties (KAHP)	211	Family	MTW PBV (211)	Yes
Project-Based Rental Assistance (PBRA)				
Central Square Terrace	90	Senior and Disabled	Multifamily PBRA	No
Emerald Street House	10	Chronically mentally ill	Section 202	No
Low Income Housing Tax Credit (LIHTC) Properties				
Riverbend	24	Family	MTW PBV (24)	Yes
Evergreen Knoll	32	Family	USDA RD/HOME/ MTW PBV (3)	Yes
Stone Arch Village Senior Housing	33	Senior	MTW PBV (33)	Yes
Stone Arch Village Family Housing	24	Family	MTW PBV (24)	Yes
Brookbend East	40	Family	Multifamily PBRA / MTW PBV (11)	Yes
Brookbend West	35	Family	Multifamily PBRA / MTW PBV (10)	Yes
Affordable Housing Preservation Program				
Meadow Road	18	Family	AHPP PBV (18)	Yes
Special Programs – Cheshire Housing Opportunities & Shelters				
Ash Brook	24	Family	KH Managed	No
Fairweather Lodge	6	Chronically mentally ill	MTW THASP	Yes
Cottage Street	3	Family	MTW PBV (3)	Yes
Family Shelter	1	Homeless	MTW THASP	Yes
Men’s Shelter	1	Homeless	MTW THASP	Yes
Housing Choice Voucher Programs				
MTW Housing Choice Voucher Program	587	All	MTW	Yes
Non-Elderly Disabled (NED) Vouchers	100	Non-elderly Disabled	Special Purpose	Yes
Mainstream-5 Vouchers	50	Non-elderly Disabled	Section 811	Yes
Total Units	952			

Section III.

Proposed MTW Activities

2017.02.HC PBV Mobility Wait List

Under HUD regulation 24 CFR 983.260 – Family Right to Move, when issuing tenant-based vouchers PHAs are required to provide them first to project-based voucher (PBV) households who requests one and has fulfilled at least one year of tenancy. However low turnover rates in our tenant based voucher program means that PBV residents are generally eligible for a tenant-based voucher as soon as one becomes available. Under the current regulation each voucher we issued would then go to a household already receiving housing assistance rather than one from our wait list, essentially makes residency in a PBV a “requirement” to access a tenant-based voucher.

For example, in 2016 alone, 76 PBV residents have requested a tenant-based vouchers. Of those, nearly all are eligible under the current regulations. During 2015 however, we only issued 6 tenant-based vouchers and in 2016 5 were issued.

Additionally, as a majority of our PBV properties are two and three-bedroom family sites with short wait times (1-2 years), compared to our elderly/disabled sites (5-7 years) and 86% of the PBV households who have requested a mobile voucher are from family sites, issuing scarce vouchers to PBV households would severely limit the number of elderly and disabled households able to access tenant-based vouchers.

Keene Housing values housing choice, however we also recognize the need to assist otherwise eligible, unassisted households, who have often waited years for assistance; particularly the elderly/disabled households who makeup 58% of our wait list applicants. To balance these two priorities, Keene Housing increased the tenancy requirement for PBV households from one to two years. In addition, we established a ratio whereby every sixth tenant-based voucher issued will go to an eligible PBV household that has requested a tenant-based voucher by opting in to our Mobility wait list.

The policies ensure equitable access to housing by households waiting for assistance as well as by assisted households looking to move to the private market. This initiative meets the Housing Choice statutory objective and increases the number of units available to all low-income households by ensuring that availability of PBV units are not a barrier to those needing assistance. And it reduces wait times by ensuring that those on the wait list are assisted before those already being assisted.

For administrative purposes, all PBV households who applied for our tenant-based wait list prior to the implementation of this policy were automatically moved to the Mobility Wait List in the order of their original application. At lease-up, all PBV households are informed of their right to a tenant-based voucher after two-years of tenancy and given the choice to opt-in to our Mobility Wait List. PBV households may request to be placed on the Mobility wait list at any time.

PBV households are still eligible for transfers within the KH PBV portfolio during the PBV Mobility Wait List tenancy requirements if such a transfer is approved by the PBV owner. In addition, KH waives the PBV Mobility Wait List requirements for PBV households that meet the eligibility criteria for a tenant-based voucher under KH’s Violence Against Women Act (VAWA), Reasonable Accommodation, or Government Displacement/Natural Disaster Preference policies.

Metrics

The following is a list of the metrics KH will track using HUD’s established criteria. As is often the case since the adoption of the most recent 50900, many of the metrics that HUD require we track as a prerequisite for approving an MTW activity are irrelevant to this activity’s design or intended outcomes.

The metrics marked with a (!) are those that HUD is requiring us to measure, despite the metrics’ inappropriateness and irrelevance. Baselines and benchmarks for most of these metrics are set to zero because they cannot be measured. KH, like HUD, is committed to measuring MTW initiatives’ efficacy, and we look forward to working with the Department to improve the 50900 so that it becomes a more useful tool for tracking and evaluating MTW activities.

CE#1: Agency Cost Savings[!]

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Cost in task dollars (decrease).	0	0		

CE#2: Staff Time Savings[!]

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Time to complete task in staff hours (decrease).	0	0		

HC #3: Decrease in Wait List Time

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	84	36		

Need/Justification for MTW Flexibility

KH originally implemented this policy as part of an MTW Administrative Plan change in August 2013. At that time, after discussion with the HUD MTW office, it was determined that the policy change did not require proposal of a new MTW activity or change in our existing PBV activity. However, in 2016, a HUD review of the policy and its implementation prompted the MTW office to reverse its decision and request that we propose this existing policy as a new MTW activity in this Plan.

The PBV Mobility Wait List activity utilizes Attachment C, Section D(7) – Establishment of an Agency MTW Section 8 Project-Based Program to waive provisions of 24 CFR 983 and Attachment C, Section D(4) – Waiting List Policies to waive provisions of Section 8(o)(16) (D) of the 1937 Housing Act. Specifically the proposed activity increases the tenancy requirements for PBV households wishing to receive a tenant-based voucher, establishes a separate wait list for PBV households who have requested one, and establishes a ratio for the frequency in which the agency will provide a tenant-based voucher to a PBV assisted households.

This flexibility is necessary as analysis shows that without this activity tenant-based vouchers would almost exclusively go to PBV participants, hampering the agency's ability to help those still requiring housing assistance.

Section IV.

Approved MTW Activities

Activity Numbering System

KH utilizes a numbering system to assist readers in finding specific activities or identifying an activity's purpose. The Plan approval year is the first section of the activity number. The second number refers to the activity number for that year. The final two letters indicate the statutory objective the activity relates to – Housing Choice (HC), Cost Effectiveness (CE), and Self-Sufficiency (SS). In cases where an activity falls under more than one objective, KH's primary goal in initiating the activity is used.

Implemented Activities

1999.01.HC Eligibility Administration Guidelines

Plan Year Approved: 2000

Year Implemented: 2000

KH uses a two-tiered system for determining eligibility for our MTW HCV program. First, we calculate a household's anticipated income by applying all applicable income sources as described at 24 C.F.R. 5.609. If the calculated income is 80% AMI or less, the household is eligible for assistance under the first threshold. KH then applies an asset threshold of \$100,000 as a second layer for eligibility determination. Applicant households with assets of \$100,000 or more are not eligible for assistance even if the applicant's anticipated income falls at or below the 80% AMI threshold.

The \$100,000 asset threshold does not apply to inaccessible assets, such as irrevocable trusts. KH applies income from inaccessible assets to a household's income for determining income eligibility as if this threshold did not exist.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.02.CE Housing Quality Standards Landlord Self-Certification Inspection Protocol

Plan Year Approved: 2000 Year Implemented: 2000

Property owners are permitted to self-certify HQS compliance of units that pass an initial KH HQS inspection in lieu of a KH administered biennial inspection. This self-certification is completed by the owner certifying a unit has been maintained to HQS standards or by providing evidence that a unit has passed a third party inspection with criteria that are equal or at a higher standard than HQS, such as REAC or UPCS.

KH performs quality control inspections on a randomly selected number of owner certified units biennially. HCV participants receive information on HQS standards at lease-up and may request special inspections anytime they believe a unit violates HQS. Units that fail a biennial, quality control, or participant requested inspection return to a KH administered annual inspection schedule until the unit receives a 'Pass' status.

Landlord self-certified units are held to the same schedule or standards as other units.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.03.CE Rent Reasonableness Neighborhood Analysis Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

To comply with C.F.R. 24 902.507, PHAs typically develop and maintain, or purchase, a database of rental units in the PHA's jurisdiction which they use to determine if an owner's proposed rent is reasonable compared to similar, unassisted units. Developing a reasonableness database often requires extensive administrative time or is accompanied by the high costs of hiring an outside contractor to provide the necessary data. KH found that the high annual administrative and financial costs of this task provided little value as the region's rental market varies little from year to year and almost not at all across neighborhoods.

Dictating to participants what is a reasonable rent is also contrary to KH's philosophy of empowering participants to make decisions based on their needs, rather than to comply with arbitrary requirements set by KH or HUD. It is KH's belief that the household, not KH, is the best

judge of what an appropriate rent is (see 40% Affordability Discontinuance activity on page 18). To ensure HCV holders are not being unfairly charged unreasonable rents, KH compares our participants' rents against the Market Analysis released regularly by the New Hampshire Housing Finance Authority.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.07.HC Reasonable Rent Determination Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

KH believes that the determination of rent reasonableness for a unit is best left in participants' hands, as determined by each household's priorities, income, and needs. Instead of determining if a rent is reasonable for the participant, KH staff educates applicants on how factors relating to rent reasonableness – such as location, unit size, unit type, accessibility, amenities, tenant paid utilities, and maintenance – contribute towards a reasonable rent and provides support, if necessary, during the participant's negotiations with the owner.

To further support participant independence, KH does not execute Housing Assistance Payment (HAP) contracts, or negotiate rents with owners on participants' behalf. Instead, KH pays the HAP directly to the participant with the understanding that the participant is expected to pay full rent, not just their portion, to the owner. Participants who fail to pay their full rent are subject to eviction, removed from the HCV program, and any remedies available to KH for recovering misspent HAP.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.08.HC 40% Affordability Discontinuance

Plan Year Approved: 2000 Year Implemented: 2000

KH does not require participants to maintain a rent burden of less than 40% when leasing a unit or negotiating rents with an owner. Instead, we allow the participant to be the judge of his or her priorities in relation to housing choice and rent burden. Participants are counseled during the issuance briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing a unit that creates a high rent burden. Once a unit is chosen, KH calculates the proposed rent burden and, if it exceeds 40%, KH allows the participant an opportunity to demonstrate how they will afford their rent without sacrificing other household necessities. Households whom KH permits to lease-up with a rent burden exceeding 40% are not eligible for Safety Net unless an unanticipated change in circumstances, such as income loss or change in household composition, causes a rent burden in excess of their rent burden at lease-up.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

2005.03.HC MTW Homeownership Flat Subsidy

Plan Year Approved: 2005 Year Implemented: 2005

Keene Housing provides participants interested in homeownership the opportunity to purchase a home while keeping their MTW HCV through the MTW Homeownership Program. KH's program generally mirrors the traditional HUD homeownership program by requiring households to meet specific requirements in order to be eligible for the program, including homeownership counseling. Under the traditional HUD homeownership program, a non-elderly, non-disabled household may receive assistance for up to 15 years on a 20 year or longer mortgage (10 years for a shorter mortgage). This assistance continues regardless of income after the initial income eligibility determination.

In our experience, the lengthy approval process sometimes results in an eligible household finding themselves over the 80% AMI threshold by the time a home is located and a lender secured. Additionally, households sometimes increase their income above 80% AMI after obtaining a home.

While KH believes that supporting a household's homeownership goals and maintaining homeownership is important, we also believe that continuing to assist households after they no longer need assistance is contrary to our mission and an inefficient use of tax payer funds. To

balance these two goals, in addition to HUD's standard term limits, KH initiated a flat subsidy for households in the program with incomes between 80% AMI and 140% AMI. By adopting both a flat subsidy and term limits, KH promotes participants' efforts to increase financial stability while holding them to a higher standard than HUD's traditional homeownership program.

With the economic and housing market instability in 2008, Keene Housing initiated a policy change that permitted homeownership families to request an interim recertification if their incomes changed. This policy change prevented at least two foreclosures and remains in place.

As of July 2016, no new Homeowner Vouchers were issued, although 2 households purchased a home without our assistance. Five households currently participate in the Homeownership program.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.06.HC Transitional Housing Assistance Subsidy Program

Plan Year Approved: 2000 Year Implemented: 2000

KH's Transitional Housing Assistance Subsidy Program (THASP) helps homeless and hard-to-house individuals and families access stable housing through partnerships with local service providers. THASP partners receive fixed subsidies to offset the costs of maintaining shelters for the region's homeless, re-entry, and domestic violence populations. In exchange, partners agree that THASP participants do not pay more than 30% of their income for shelter and receive case management and counseling to help gain long-term housing.

THASP has become a critical component of Keene's homeless and domestic violence shelter system. KH provides fixed subsidies for 4 transitional housing programs – a Men's Homeless Shelter, a Family Homeless Shelter, Second Chance for Success transitional housing program for individuals leaving incarceration, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault. Three of the shelters – the men's shelter, family shelter, and Second Chance – are managed by Southwestern Community Services (SCS), the local Tri-Cap agency.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.04.CE Stepped Subsidy Rent Reform

Plan Year Approved: 2000 Year Implemented: 2000

In KH’s experience, non-elderly, non-disabled households coming off the wait list are often in need of more support and financial assistance than those who have been receiving assistance for a longer period of time. The Stepped Subsidy Rent Reform responds to this need by providing a deep Housing Assistance Payment (HAP), with households only paying 20% of gross income towards rent for the first two years of housing assistance (see table, below, for 2017 Stepped Subsidy amounts).

# BR	VPS	Step 1 HAP	Step 2 HAP (65% of VPS)	Step 3+ HAP (45% of VPS)
SRO	\$597	VPS-20% Gross Income = Subsidy	\$390	\$270
0	\$797	VPS-20% Gross Income = Subsidy	\$520	\$360
1	\$851	VPS-20% Gross Income = Subsidy	\$550	\$380
2	\$1067	VPS-20% Gross Income = Subsidy	\$690	\$480
3	\$1287	VPS-20% Gross Income = Subsidy	\$840	\$580
4	\$1566	VPS-20% Gross Income = Subsidy	\$1020	\$700
PAD	\$388	VPS-20% Gross Income = Subsidy	\$250	\$170

During this time participants are also enrolled in the Resident Self-Reliance (RSR) program (page 22) where they receive supportive services from KH’s Resident Service Coordinators (RSCs). Households work with RSCs throughout their time with us to identify barriers to self-sufficiency and to develop a plan for moving towards financial security and, eventually, out of housing assistance.

We have found that calculating HAP based upon a household's earnings punishes them for increasing their income by responding to the increased income with an in-kind increase in tenant rent payment. This is a serious disincentive for a household to increase its income and has been found to result in employment instability and under reporting of income. It has also been found to negatively impact a household's ability to save or plan for the future, both of which are contrary to KH's mission.

To promote long-term employment and financial stability, after the first two years of assistance the amount of HAP a household receives is disconnected from their earnings and is instead calculated as a percentage of the voucher payment standard (VPS) the household is eligible to receive. In Year 3 the household receives 65% of the VPS towards their rent. The HAP is reduced again in Year 4 to 45% of VPS.

Stepped Subsidy is mandatory for all non-elderly, non-disabled households in the MTW HCV and PBV programs, although both elderly and disabled households may opt-in to the program. Currently 141 households have their subsidy calculated under the Stepped Subsidy Rent Reform.

Stepped Subsidy households are subject to the Reasonable Rent Determination Discontinuance activity (page 17). HAP is paid directly to the household and it is the household's responsibility to pay the full rent to the owner and KH does not execute a HAP contract with the owner. In addition, all Stepped Subsidy participants are required to participate in the RSR program as long as they receive housing assistance.

In 2015, 11 (10%) Stepped Subsidy households moved out of housing assistance and became self-sufficient. Since 2010, the number of self-sufficient households moving out of housing assistance has remained steady at 10% to 15% of participating households annually, compared to less than 5% of similar households we serve in other programs who cannot participate in Stepped Subsidy or RSR programs.

KH monitors rent burden quarterly to ensure participation in Stepped Subsidy does not cause excessive burdens to participating households. Ongoing evaluation shows that of 16 households with a rent burden exceeding 45% in June 2016, 13% (2) have been burdened for less than six months and 19% (3) receive Temporary Assistance for the Needy (TANF). The remaining are employed with an average wage of under \$10 an hour.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

1999.05.SS Resident Self-Reliance Program

Plan Year Approved: 2000 Year Implemented: 2000

Participants in the Stepped Subsidy Program are required to participate in KH's Resident Self-Reliance (RSR) program. RSR's central premise is that to become financially stable and self-sufficient, households must achieve the following five Foundational Proficiencies: Household Stability, Wellness and Healthy Relationships, Education and Training, Financial Management, and Employment and Household Management.

Each household is assigned a Resident Service Coordinator (RSC) who provides service coordination and case management to help participants understand and remove the obstacles keeping them from achieving self-sufficiency. The RSCs are funded through HUD's Housing Choice Voucher (HCV) Family Self-Sufficiency (FSS) Grant Program.

Individualized Goal Setting

New participants meet with their RSC to complete an initial Proficiencies Assessment. The assessment helps the household and RSC develop an individualized 3-year Goal Action Plan. The plan includes actionable goals and milestones tailored to the assessment findings, with concrete dates for completion. Participants are encouraged to anticipate scheduled increases in rent, as described in the Stepped Subsidy activity (page 20), or other potential financial changes, such as changes in benefits due to increases in earnings, when developing their Goal Action Plan so as to avoid the so-called "cliff effects" that often result from increases in earned income. Upon completion of a 3-year Goal Action Plan, the participant and RSC establish a new 3-year plan. This process continues until the household leaves the MTW program.

Development Grants and Rent Credits

KH created the Development Grants and Rent Credit (DGRC) fund in 2014 to help offset the costs associated with attaining household goals and to provide RSR participants financial rewards for attaining them. The amount of DGRC funds available to each household is determined annually based upon MTW funding availability. RSR participants can receive DGRC funds both as Development Grants and Rent Credits.

Development Grants help households pay the costs associated with achieving goals in their 3-year Goal Action Plan. Examples of Development Grants include help with tuition, textbooks, exams, childcare, and even car repairs.

Rent Credits are designed to provide a financial reward to households that meet an established milestone or goal from their 3-Year Goal Action Plan. Upon completing a goal, the household receives a credit towards the following month's rent. Rent credit amounts are agreed upon by RSC based upon the difficulty of the goal and the amount of funding available. Households may receive a Rent Credit for meeting any goal, even if they utilized a Development Grant to achieve it.

Development Grants and Rent Credits are available to all RSR participants who are in compliance with the RSR program and the Obligations of the Family agreement, which outlines all the responsibilities a voucher household is required to fulfill, as well as all prohibited actions.

Participant Compliance

Once a household establishes a 3-Year Goal Action Plan, the household and RSC meet quarterly to discuss the household's progress and any barriers that have arisen since the last meeting. Attending these meetings is mandatory. Participants who miss three (3) quarterly meetings are terminated from the RSR, Stepped Subsidy, and MTW HCV programs.

RSR Waivers

Prior to 2014, participants who completed the RSR program requirements or had completed 5 years in the RSR program received an RSR waiver. Those households remained in the Stepped Subsidy program but were no longer required to attend meetings with their RSC or participate in RSR workshops. When the RSR program was restructured in 2014 we discontinued this practice. RSR Participants that received a waiver prior to the restructuring are permitted to keep their waiver unless they:

- Apply for hardship through Safety Net;
- Are found non-compliant with their lease or Obligations of the Family; or
- The Step 3 Total Tenant Payment (TTP) is less than 30% of the household's gross income.

As of June 2015, all waived households have moved to active status.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

2005.01.CE Elderly and Disabled Household Alternative Recertification Schedule

Plan Year Approved: 2005 Year Implemented: 2005

KH uses a streamlined recertification process for elderly and disabled households receiving 100% of their income from any fixed income source that do not have net assets exceeding \$50,000. Instead of the traditional recertification, KH relies on the published Cost of Living Adjustment (COLA) and Enterprise Income Verification (EIV) system to calculate each household's income.

Households receive a notification via mail of their new tenant share and subsidy without attending a recertification appointment. Included with this notice is the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). All elderly and disabled households may request an interim at any time.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2005.02.CE Stepped Subsidy Recertification Schedule

Plan Year Approved: 2005 Year Implemented: 2005

Instead of the traditional annual recertification process, participants whose subsidies are calculated under the Stepped Subsidy Rent Reform are recertified at each Step change, typically Years 3 and 4.

Once a household reaches Step 3, KH replaces the recertification process with an Enterprise Income Verification (EIV) systems check to test if the family has met the \$0 HAP threshold (page 26), and for processing recertifications.

All Stepped Subsidy households also participate in the Resident Self-Reliance Program (RSR) and are required to attend quarterly meetings with their Resident Service Coordinator (RSC). Participants and RSCs review income and employment data at these meetings. This data is used to ensure program eligibility and to measure each household's progress towards their 3-Year Goal Action Plan. If necessary, RSCs also collect new Authorization for Release of Information/Privacy Act Notices (HUD form 9886) at this time.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2008.01.HC Project-based Voucher Program

Plan Year Approved: 2008 Year Implemented: 2008

KH project-bases at least 60% of its available voucher funding plus any funding received for units project based through the AHPP activity (page 27). In addition, KH waives the required public process for project-basing units within KH owned and managed properties and those project-based through the AHPP activity. KH also uses its MTW flexibility to project base up to 100% of the units within a property.

Changes Proposed for FY2017

The New Hampshire Housing Finance Authority (NHHFA) recently completed its Housing Needs in New Hampshire assessment, a three-part study performed by the New Hampshire Center for Public Policy Studies and Applied Economic Research. The study examined the State's future housing needs particularly around factors such as job growth, age of housing stock, expected demographics forecast through 2025. The second part of the study, "Senior Housing Perspective", delved into the needs and preferences of our rapidly growing senior population. The study determined that based on the fact that New Hampshire has the fourth oldest median age population in the country, and that seniors will occupy one in three housing units by 2025, the current housing stock is insufficient to meet this expanding need. Our experience in the Monadnock Region confirms NHHFA's findings. Already the wait list times for our elderly/disabled properties are nearly double that of our family sites, 5-7 years compared to 1-3, respectively. Based on the study findings and our demand trends, it is unlikely that we will be able to meet this demand with our current housing stock.

In response to current and anticipated future demands, KH proposes to increase the percentage of its available voucher funding to 75% plus any funding received for units project based through the AHPP activity. This change would permit the agency to pursue development and acquisition options consistent with the anticipated needs of the community.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2008.02.CE Restrictions on Section 8 Portability

Plan Year Approved: 2008 Year Implemented: 2008

KH restricts the ability of participants in the RSR program to port out of the Monadnock Region unless they have a verifiable need for a reasonable accommodation, are the victim of domestic violence, or can show that, consistent with the RSR program's intent, such a move would demonstrably increase their financial stability, such as new employment or enrollment in an educational program. There are no portability restrictions for elderly/disabled MTW HCV, NED, or MTW PBV households.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2013.01.SS \$0 HAP Rent Burden Test

Plan Year Approved: 2013 Year Implemented: 2013

KH encourages participants to increase their income and move towards self-sufficiency. However, we understand that the fear of a sudden loss of important safety nets, such as housing subsidy, may hold participants back from pursuing opportunities to change jobs and/or increase income. Even if a household increases their income so that they no longer need housing assistance, there are many obstacles that they may face in the first few months after the household loses housing assistance. However, as an agency dedicated to helping our low-income neighbors reach permanent financial independence, we recognize that we should not continue helping households that no longer need our assistance.

The \$0 HAP Rent Burden Test provides us a way to meet that delicate balance. When a Stepped Subsidy household reaches economic independence, measured as having a gross rent at or below 30% of gross income, KH reduces the HAP to \$0 for 6 months. If the household does not experience an unanticipated change in income within the \$0 HAP period, housing assistance is terminated. This provides households a period to adjust to life without housing assistance, while also ensuring we are being responsible stewards of the tax payers' investment.

Changes Proposed for FY2017

KH proposes to change the basis for the \$0 HAP threshold from the household's actual gross rent to the lesser of the household's gross rent or eligible VPS. Current policy allows a household

with a higher gross rent than their eligible voucher payment standard, either by renting a costlier unit or choosing to be over housed, to continue getting subsidy long after a similar household renting within the VPS or in an appropriately sized unit would have transitioned to self-sufficiency. As KH capped the project based rent at the VPS and requires over housed households to transfer to smaller units, this creates a situation where our project based voucher holders are disproportionately held to a higher standard than our tenant based voucher holders.

Impact

Currently three households are paying a higher gross rent than their eligible VPS. All three are active RSR participants and two are over housed by choice.

Subsidy	Annual Income	Eligible Unit Size	Unit Size Rented	Eligible VPS	VPS Rent Burden	Gross Rent	Gross Rent Burden
Stepped	\$39,546	1	1	\$851	26%	\$1027	31%
Stepped	\$24,960	1	2	\$426	20%	\$693	33%
Stepped	\$44,944	2	3	\$1067	28%	\$1381	37%

Transition

KH will confirm household eligibility under the new policy at each participant’s next quarterly meeting (RSR households) or annual recertification (Income Based households). As the activity already provides a 6 month transition period, no additional transition time is necessary.

Metrics Changes for FY2017

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

2014.01.HC Affordable Housing Preservation Program

Plan Year Approved: 2014 Year Implemented: 2015

AHPP provides property owners the ability to opt-out of an expiring Project Based Rental Assistance (PBRA) contract and execute to a AHPP PBV HAP contract with KH. As vouchers sometimes provide higher payments than older PBRA contracts, entering into a AHPP PBV HAP contract can provide owners access to additional rental revenue and new potential funding opportunities for capital improvements. In addition, the AHP program is much easier and less expensive for owners to comply with than HUD’s multifamily program. This results in reduced overhead for owners, which when combined with competitive PBV rents, makes the AHP

program very attractive to owners of expiring use properties as well as investors interested in purchasing and preserving them. At opt-out, KH provides residents the option of remaining in place and converting their Enhanced Vouchers to PBVs, staying in-place with their Enhanced Vouchers, or taking their vouchers to the private market.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2014.02.CE Medical Deduction Threshold

Plan Year Approved: 2014 Year Implemented: 2014

Using HUD's traditional medical deduction formula, elderly and disabled households may claim unreimbursed medical expenses over 3% of their annual income as a deduction when their income is being calculated for the purpose of rent determination. Prior to implementing this initiative KH found that most households did not need the deduction or were using it to offset costs not covered by Medicaid or Medicare. With the implementation of the Affordable Care Act (ACA), KH found that fewer households needed the lower medical deduction threshold for out-of-pocket medical expenses and were primarily using the deduction for optional private insurance coverage. KH decided to align its medical deduction threshold to that used by the Internal Revenue Service and increased the threshold to 7.5% for elderly and disabled households' unreimbursed medical expenses. This change created a buffer for households that suffer unusually high out-of-pocket medical expenses while ensuring that limited housing dollars were not being used to subsidize private insurance.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2014.03.SS Asset Exclusion Threshold

Plan Year Approved: 2014 Year Implemented: 2014

When a household's assets total \$50,000 or less, KH does not include the imputed value of the household's assets as income when determining the household's total tenant payment. This allows voucher participants the opportunity to establish and increase assets without being penalized by a corresponding rent increase. KH continues calculating the imputed value for all assets in the income calculation when a household's total assets exceed \$50,000.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2014.04.SS Keene Housing Kids Collaborative

Plan Year Approved: 2014 Year Implemented: 2015

Keene Housing Kids Collaborative (KHKC) is a 501(c)(3) non-profit organization KH created in 2015 to provide educational and other services to children living in KH owned or managed properties, as well as children living in privately owned housing with assistance from an MTW Housing Choice, Non-Elderly Disabled, or Mainstream voucher. No child for whom KH provides any sort of support is excluded from participating in KHKC programming or community partnerships.

After many years of operating a small after school program with just a handful of children participating, KH, through its support for KHKC, is now fully engaged in the very difficult work of providing KH youth the educational, social and emotional tools and experiences they need to flourish in school and in the community so that, once they complete high school and move on to secondary or vocational school, they will be prepared to succeed. KHKC's task is to make sure that children growing-up in KH or KH assisted housing will not need housing assistance when they become adults.

To that end, KHKC has already forged important partnerships with various providers of educational, social, athletic, and other programming for children, with an initial focus on preschool to elementary-aged children. KHKC is engaging local academics with interest in issues of child development and generational poverty to study how KHKC's interventions with support from KH, can effect the economic outcomes of children living in KH-assisted housing. The hope is that much can be learned by exploring how, thanks to MTW, KH is combining its focus on adult self-sufficiency in the RSR program with the work KHKC is doing with the children of RSR families in particular, to effect multi-generational economic development.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2014.05.HC Affordable Housing Preservation & Modernization Program

Program Year Approved: 2014

Year Implemented: 2014

The Affordable Housing Preservation and Modernization Program allows KH to use savings realized from MTW rent, programmatic, and administrative reforms to address KH, and KH-affiliate owned properties' growing capital needs. These funds allow KH to respond to the portfolio's needs in a rational way, with a predictable schedule, based on greatest need and economies of scale, rather than in reaction to unpredictable and uncertain grant opportunities. With planned capital expenditures for 2017 of more than \$1 million, MTW is playing a critical role in preserving the lion's share of Keene's affordable units.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2015.01.CE Affordable Housing Preservation Program Rent Reform

Plan Year Approved: 2015

Year Implemented: 2015

The AHPP Rent Reform provides a streamlined methodology for calculating rent while providing households an opportunity to increase income and assets without immediate increases in rent. As in the traditional PBV program, subsidy is calculated based upon 30% of a household's adjusted annual income. However, the activity alters the current methodology for calculating rent and the recertification schedule with the following streamlined strategies:

- Triennial recertifications for all households.
- Interim recertifications are limited to household composition changes and cases where the total household income permanently drops by \$50 per month or more,

with access to Safety Net for short term financial hardship.

- The Utility Allowance in effect at the effective date of the last regular recertification is used to calculate rents at interim recertifications.
- Household assets with a total net value of \$50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated.
- Utilizes the published Cost of Living Adjustment (COLA) and the Enterprise Income Verification (EIV) system to calculate household income for elderly and disabled households.

By simplifying the recertification and rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. In addition, this policy allows participant households the opportunity to increase earnings and assets without being discouraged by corresponding increases in rent. As evidenced by KH's successful Stepped Subsidy Activity, disconnecting a household's rent from increases in earnings or assets often leads to positive household outcomes.

Changes Proposed for FY2017

KH proposes no changes to this activity..

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

Hardship Case Criteria

Households affected by this policy are provided two options when they experience a hardship that increases their rent burden. First, should a household experience a decrease in household income of \$50 or more per month, it may request that KH, or the administering agency, perform an interim recertification to recalculate the household's share of the rent.

Second, if a household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program which provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. KH has operated Safety Net since first joining

MTW in 2000 as part of the Stepped Subsidy activity.

2015.02.CE Affordable Housing Preservation Program Alternative Inspection Schedule

Plan Year Approved: 2015 Year Implemented: 2015

Properties participating in AHPP (page 27) use the following alternative schedule for Housing Quality Standards (HQS) inspections:

- All units converting to AHPP are inspected by the administering agency for HQS compliance no more than 90 days before initial conversion.
- If all units pass initial inspection, KH inspects 20% of the units biennially.
- Should any unit fail initial or biennial HQS inspection, the property is subject to an annual inspection of 100% of units until all pass HQS inspection, at which time the property returns to a 20% biennial inspection schedule.
- Properties subject to a higher inspection protocol than HQS may use that protocol in lieu of a biennial (not initial) HQS inspection.
- Properties that fail an inspection based upon a higher standard protocol are subject to an annual HQS inspection of all (100%) units until all units pass HQS or a higher inspection protocol.
- A household may, at any time, request a HQS inspection from the administering agency should the tenant believe that their unit does not meet HQS.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

2015.03.CE Earned Income Disregard Discontinuance

Plan Year Approved: 2015 Year Implemented: 2015

KH discontinued allowing new households to claim the Earned Income Disregard (EID) from the calculation of tenant rent. All households claiming EID as of January 1, 2015 were permitted to do so until the natural end of their EID allowance, as required by regulation.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2017 Report.

Hardship Case Criteria

All households are eligible for assistance under KH's Safety Net program. Safety Net permits households who suffer unanticipated increases in rent burden due to a loss of income or increase in medical expenses to apply for a temporary reduction of their tenant share. In addition, the population eligible for the EID are generally not in the Stepped Subsidy program and can request an interim recertification for long-term income changes at any time.

2016.01.CE Project-Based Unit Agency Conducted Inspections

Plan Year Approved: 2016 Year Implemented: 2016

Due to KH's inability to locate a third party inspector, KH waived the third party inspection requirement under Section 8(o)(11) of the 1937 Housing Act and 24 CFR 983.103(f)(1) in our 2016 Plan.

KH's Director of Facilities and Assets certifies all KH owned and managed Project Based Voucher (PBV) units to Uniform Physical Condition Standards (UPCS) at turnover. In addition, a KH inspector certifies that these units meet Housing Quality Standards (HQS). In addition, supervisory personnel who have not been involved in routine inspections monitor the quality of KH's inspections, by re-inspecting five percent (5%) of all initial and annual inspections performed each quarter as a Quality Control (QC) mechanism.

A Request for Proposals (RFP) for HQS services was published in 2014, in September of 2015, and again in September 2016. KH received no proposals.

KH will continue publishing a RFP for third party HQS inspections at least annually in an attempt to locate a third party inspector.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2016.02.HC Project MARCH (Monadnock Area Resources Curing Homelessness)

Plan Year Approved: 2016 (Amended)

Plan Year Implemented: 2016

Project MARCH uses a Housing First model that provides partner agencies fixed subsidies to secure and maintain private market housing for their homeless clients. The first Project MARCH Partner is Southwestern Community Services (SCS). SCS is our region's Community Action Agency, and our largest THASP partner. KH pledged up to twenty (20) Project MARCH subsidies to SCS in 2016. This commitment expands affordable housing options in the community and provides options beyond the shelters for those who may otherwise find it difficult to secure permanent, affordable housing.

Project MARCH utilizes preferences to prioritize homeless veterans, followed by chronic homeless households, then homeless households. Every household who receives housing through Project MARCH is also offered two months of supportive services from SCS. SCS continues working with households who request its additional services after two months.

The Project MARCH partner is responsible for creating and enforcing eligibility and continued occupancy policies. Such policies must, at minimum, meet the following requirements:

- Ensure that no policies or procedures violate any federal, state, or local regulation or statute.
- Certify that no Project MARCH participant has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- Require that at least one member of the participating household has established citizenship or eligible immigration status.
- Confirm that all units leased through Project MARCH meet Housing Quality Standards (HQS) protocols and are subject to KH's HQS quality control protocols.
- Establish that a Project MARCH participant's rent burden cannot exceed 45% of monthly income.
- Certify that no Project MARCH participant's annual income will exceed 80% Area Median Income (AMI) at eligibility.
- Verify that the partner will not impose a time limit for participation, but will require

Project MARCH participants to apply for housing assistance with KH.

Changes Proposed for FY2017

KH proposes no changes to this activity.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

Not Yet Implemented Activities

All KH MTW activities have been implemented.

Activities on Hold

2011.01.CE Housing Quality Standards Biennial Inspection Schedule

Plan Year Approved: 2011 Year Implemented: 2011

KH uses a biennial schedule for units that have passed an initial or annual inspection for HQS compliance. Any property that fails an initial or biennial inspection is held to an annual inspection schedule until such time that all units pass an annual inspection.

Changes Proposed for FY2017

Due to changes in 24 CFR982.405 which now permit all public housing authorities to utilize a biennial inspection schedule, KH is closing out this activity in FY2017. We have notified the field office of our intent to continue our biennial inspections as permitted under the new regulation.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

2013.02.CE Housing Quality Standards Alternative Inspection Protocol

Plan Year Approved: 2013 Year Implemented: 2013

KH permits units that pass an inspection held to a stricter protocol than HQS – REAC, UPCS, State Finance Authority, etc. – to use the stricter protocol to demonstrate compliance with the property's biennial HQS inspection requirement.

Changes Proposed for FY2017

Due to changes in 24 CFR982.405 which now permits all public housing authorities to use a higher protocol to verify HQS compliance, KH is closing out this activity in FY2017. We have notified the field office of our intent to use alternative inspections in lieu of HQS, as permitted under the new regulation.

Metrics Changes for FY2017

KH will outline any changes to metrics or baselines for this activity in the FY2017 Report.

Closed Out Activities

2006.01.CE Standard Deductions

Plan Year Approved: 2006 Year Closed: 2013

In 2006, KH adopted a flat deduction for all elderly and/or disabled households. Households who believed their unreimbursed medical expenses were above the 3% medical deduction threshold could request that KH calculate their medical deduction instead of applying the standard deduction.

Since the process of verifying and calculating medical deductions can often be administratively burdensome, it was believed that using a flat deduction would provide administrative savings to offset any potential HAP loss. Delays in implementation and data collection resulted in KH being unable to determine the impact of this activity until 2012. A 2012 analysis showed that the loss in HAP funds due to households receiving medical deductions that they would not otherwise be eligible for far outweighed any administrative savings.

In 2013, KH discontinued application of the standard deduction for households with no unreimbursed medical expenses or expenses below the medical deduction threshold.

Section V.

Sources and Uses of Funding

This section describes the agency's projected revenue and expenditures for MTW funds for 2017 and reflects use of MTW Block Grant Single-fund Flexibility.

Estimated Sources of MTW Funding for the Fiscal Year

The following table summarizes estimated MTW sources of funds for 2017 by Financial Data Schedule (FDS) line item, as required by new HUD guidance on MTW Plans and Reports. Since HUD's FY2017 funding levels have yet to be established, the following estimates assumes no additional proration in HUD funding.

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300 + 70400)	Total Tenant Revenue	\$0.00
70600	HUD PHA Operating Grants	\$5,292,693.00
70610	Capital Grants	\$0.00
70700 (70710 + 70720 + 70730 + 70740 + 70750)	Total Fee Revenue	\$0.00
71100+72000	Interest Income	\$0.00
71600	Gain or Loss on Sale of Capital Assets	\$0.00
71200 + 71300 + 71310 + 71400 + 71500	Other Income	\$0.00
70000	Total Revenue	\$5,292,693.00

Estimated Use of MTW Funding for the Fiscal Year

The next table summarizes estimated MTW expenditures of funds for 2017 by FDS line item. The FDS line item format captures only select capital costs. The table does not include funds utilizing Single Fund Flexibility and/or allocated to programs and activities outside traditional operations, for example KH's Affordable Housing and Modernization Program. As a result, comparing totals of the two tables will not provide a clear picture of KH's financial outlook. Expenses which are not captured within the table are described within the narrative of the

individual activities which utilize MTW funds in ways not captured by FDS.

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$505,712.00
91300+91310+92000	Management Fee Expense	\$ 0.00
91810	Allocated Overhead	\$ 0.00
92500 (92100+92200+92300+92400)	Total Tenant Services	\$199,533.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 0.00
93500+93700	Labor	\$ 0.00
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 0.00
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 0.00
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$2,000.00
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 0.00
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 0.00
97100+97200	Total Extraordinary Maintenance	\$ 0.00
97300+97350	Housing Assistance Payments + HAP Portability-In	\$4,018,341.00
97400	Depreciation Expense	\$1,000.00
97500+97600+97700+97800	All Other Expenses	\$ 0.00
90000	Total Expenses	\$4,726,586.00

Single Fund Flexibility

KH does not own any public housing and therefore does not combine Section 8 and Section 9 funds. KH relies solely on Section 8 funds and administrative fees to administer our programs.

Local Asset Management Plan

Is the PHA allocating costs within statute? YES

Is the PHA implementing a local asset management plan (LAMP)? NO

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix? NO

Keene Housing does not own or manage any public housing units and is not required to implement or submit a Local Asset Management Plan.

Extract of the Minutes of the Regular Meeting of the
Keene Housing Board of Commissioners
September 21, 2016

Members Present: Lee Robator, Chairperson
J.B. Mack, Vice Chairperson
Tom Moses, Commissioner
Pam Slack, Commissioner
Jen Marsh, Commissioner

Resolution No. 555 - Approval of Fiscal Year 2017 Moving to Work Annual Plan

RESOLVED, that the Keene Housing Board of Commissioners approves and adopts Keene Housing's Fiscal Year 2017 Annual Moving to Work Plan; and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated September 14, 2016 from April A. Buzby, Planning and Policy Analyst, to Joshua Meehan, Executive Director.

Motion to adopt: Ms. Slack

Motion seconded by: Ms. Marsh

Motion, upon being put to vote, was passed unanimously.



Joshua Meehan, Executive Director

9/28/16
Date



Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications 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 01/01/2017, 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 conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. 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.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its 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.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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.
10. 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 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. 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.

13. 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. 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).
20. 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.
21. 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

PHA Name

NH010

PHA Number/HA Code

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

Lee Robator

Name of Authorized Official

Chairperson

Title

Signature

Date

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

Section VI.

Administrative

Public Notice

Keene Housing (KH) invites the community-at-large to review and provide comments regarding the Keene Housing DRAFT Moving to Work (MTW) Annual Plan for FY 2017. The DRAFT FY 2017 MTW Annual Plan includes one proposed initiative and changes to two existing activities. The public comment period is open from 8:30 am on Monday, August 1, 2016 until 4:30 pm on Wednesday, August 31, 2016. KH welcomes written comments received at our Administrative Office during the public comment period.

Keene Housing will hold three (3) public hearings prior to finalizing its FY 2017 MTW Annual Plan. All meetings will occur at the Community Room/FAC of KH-owned or managed property's unless otherwise noted.

Wednesday, August 3rd @ 12:30p – Harper Acres Mill Building

Tuesday, August 9th @ 5:30p – Brookbend Pavilion

Tuesday, August 23rd @ 3:30p – Keene Housing Main Office

A copy of the DRAFT MTW Plan is available for review at our Administrative Office located at 831 Court Street, Keene, starting from August 1st until August 31st during normal business hours. Electronic versions can be downloaded from www.keenehousing.org or e-mailed to interested members of the public upon request by contacting April Buzby, Planning and Policy Analyst, at (603) 352-6161 or abuzby@keenehousing.org.

Total Attendees: 3

Keene Housing received no public comment during the Public Comment period.

Agency Directed Evaluation of Demonstration

Keene Housing has not engaged any outside evaluators to review our program as a whole. The agency does engage outside evaluators on an as-needed basis.

Annual Statement/Performance Evaluation Report

Keene Housing does not own or manage any public housing units or receive any Capital Fund Grants. As such, KH is not subject to submittal of the Annual Statement/Performance Evaluation Report.

Appendix 1

MTW Activities Record of Changes

Activity Number	Activity Name	Plan Year Approved	Current Status	Change Year	Change	Reasoning
1999.01.HC	Eligibility Administration for Section 8 HCV Program	FY1999	Active	2014	Set a \$100,000 asset cap for program eligibility	Allows KH to serve those in greatest need first. Households which meet this threshold may still apply and be on the wait list.
1999.02.CE	HQS Landlord Self-Certification Inspection Program	FY1999	Active			
1999.03.CE	Rent Reasonableness Neighborhood Analysis Discontinuance	FY1999	Active			
1999.04.CE	Stepped Subsidy Rent Reform	FY1999	Active	2013 2014	Extend Step 1 from one to two years for households whose sole adult member is currently enrolled in degree or trade program Extended Step 1 to two years and decreased Step 2 to one year for all households	Provides households pursuing continuing education or professional training additional support to complete program. Decrease the number of rent burdened households at year 2.

Activity Number	Activity Name	Plan Year Approved	Current Status	Change Year	Reasoning
1999.05.SS	Resident Self-Reliance Program	FY1999	Active	2013	<p>Families that received a waiver after 3 years consistently struggled with tenancy issues, such as paying rent on time and lease compliance. Determined that 3 years was not sufficient to gain self-supports needed to succeed.</p> <p>Increased mandatory participation from 3 years to 5 years before a waiver would be considered</p> <p>Implemented individualized goal plans. Establish Development Grants and Rent Credit fund. New compliance rules and meeting schedule. Removed waiver option for all households.</p> <p>Provide RSR participants more individualized options for attaining financial stability and self-sufficiency.</p>
1999.06.HC	Transitional Housing Assistance Subsidy Program (THASP)	FY2000	Active	2016	<p>On average, waived households remain in housing assistance longer than no waived households. Provides access to RSCs and DGRC funds to promote greater self-sufficiency.</p> <p>Require households that received a waiver prior to 2015 return to RSR program is their Step 3 TTP exceeds 30% of gross income.</p>

Activity Number	Activity Name	Plan Year Approved	Current Status	Change Year	Reasoning
1999.07.HC	Rent Reasonableness Determination Discontinuance	FY1999	Active		
1999.08.HC	40% Affordability Discontinuance	FY1999	Active		
2005.01.CE	Elderly and Disabled Household Alternative Recertification Schedule	FY2005	Active	2013	Added COLA certification for household's whose sole income source is SS/SSI and asset value is less than \$5,000. Eliminates triennial certifications. Self-certification only for households with Pensions or Assets over \$50,000. Creates annual Well Checks.
2005.02.CE	Stepped Subsidy Recertification Schedule	FY2005	Active	2014	Eliminates triennial recertifications for households who have reached Step 3. KH will use annual EIV check to determine if a family has met the \$0 HAP threshold. Reduce administrative costs and provide households the opportunity to increase income and savings without concern about rent increases

Activity Number	Activity Name	Plan Year Approved	Current Status	Change Year	Change	Reasoning
2006.01.CE	Standard Deductions	FY2006	Inactive	2013	Discontinued	
2008.01.HC	Project-Based Voucher Program	FY2008	Active	2011	Increased percentage of KH's MTW allocation available for PBV use from 50% to 60%.	Expand and/or improve affordable housing options
				2014	Percentage of voucher funding available for PBVs, in excess of 60%, will increase equal to funding approved through the Affordable Housing Preservation Program.	Expand and/or improve affordable housing options
				2016	Percentage of voucher funding available for PBVs, increased to 75% plus any AFFH funding	
2008.02.CE	Restrictions on Section 8 Portability	FY2008	Active	2014	Added "ability to demonstrate an economic opportunity" to permitted reasons for porting.	Provide households an opportunity to pursue economic opportunities without potentially losing housing assistance
				2015	Removed portability restrictions for elderly and disabled households.	Expand and/or improve affordable housing options

Activity Number	Activity Name	Plan Year Approved	Current Status	Change Year	Change	Reasoning
2005.03.HC	MTW Homeownership Flat Subsidy	FY2005	Active	2017	Extend home value as asset exclusion from 10 years to life of participation	
2011.01.CE	Housing Quality Standards (HQS) Biennial Inspection Schedule	FY2011	Inactive			
2013.01.SS	\$0 HAP Rent Burden Test	FY2013	Active	2016	Change criteria for \$0 HAP eligibility from Gross Rent to the lesser of gross rent or eligible VPS	
2013.02.CE	HQS Alternative Inspection Protocol	FY2013	Inactive			
2014.01.HC	Affordable Housing Preservation Program (AHPP)	FY2014	Active			
2014.02.CE	Medical Deduction Threshold	FY2014	Active			
2014.03.SS	Asset Exclusion Threshold	FY2014	Active			
2014.04.SS	Keene Housing Kids Collaborative	FY2014	Active			

Activity Number	Activity Name	Plan Year	Current Status	Change Year	Change	Reasoning
2014.05.HC	Affordable Housing Preservation and Modernization Program	FY2014	Active			
2015.01.CE	AHPP Rent Reform	FY2015	Active			
2015.02.CE	AHPP Alternative Inspection Protocol	FY2015	Active			
2015.03.CE	Earned Income Disallowance (EID) Discontinuance	FY2015	Active			
2016.01.CE	Project-Based Unit Agency Conducted Inspections	FY2016	Active			
2016.02.HC	Project MARCH	FY2016	Active			
2017.01.CE	Alternative Asset Calculation for Homeownership Participants	FY2017	Pending			
2017.02.HC	PBV Mobility Waitlist	FY2017	Pending			