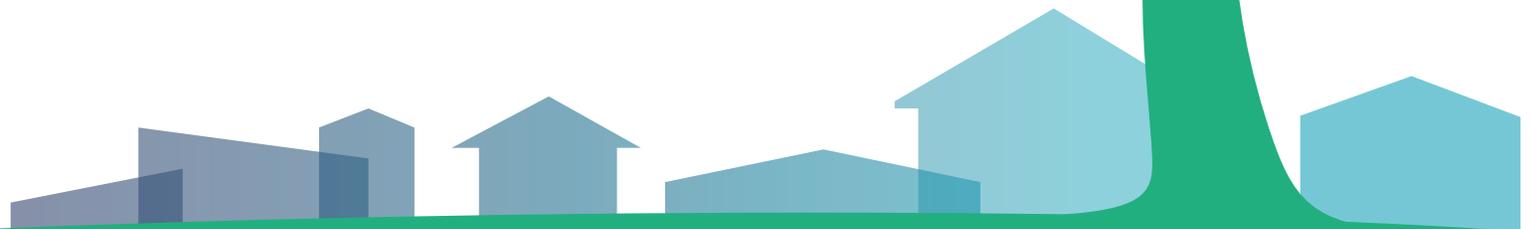




**FY 2014**  
**MOVING TO WORK**  
**Annual Plan**



**ORIGINAL OCTOBER 17, 2013**  
**REVISIONS JANUARY 24, 2014**  
**APRIL 11, 2014**

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# INTRODUCTION

## WHAT'S IN A NAME? ITS ABOUT ADVOCACY NOT AUTHORITY

Early in 2013, we began the process of taking a long, hard look at who we are as an organization and where we see ourselves heading in the years ahead. What we realized was that, with the exception of the powers granted to us by the state and city, and perhaps with the exception of the Mainstream and Non Elderly Disabled programs that we administer, we bare very little resemblance to a traditional housing authority. We no longer own or manage a single unit of public housing; thanks to MTW our Housing Choice Voucher program is virtually unrecognizable to those who've only known HUD's traditional model; self-sufficiency and resident services are central, not subordinate to our operational goals; and while project based vouchers are essential to its ongoing viability, relatively little of our portfolio is HUD financed. With the realization that we are not what the U.S. Congress envisioned in 1937 when the Housing Act was passed, nor what the New Hampshire legislature envisioned in 1941 when it passed the Housing Authorities Law, we were free to think more deeply about what we should call ourselves and why.

Through the spring of 2013 the Board of Commissioners and staff spent time picking apart, and carefully considering each word in our name. "Keene". "Housing". "Authority." The associations we attach to words, and the assumptions they lead us to, impact our interactions with the people and objects in our lives. The Board and staff agreed that "Keene" and "Housing" were important parts of our identity. We are headquartered in Keene. It was the City of Keene that created us in 1965 and our Mayor appoints our Board of Commissioners. While we do much more than simply provide housing, developing, owning and managing a portfolio of affordable developments is what we do best, and our properties are the hub of our resident self-reliance and children's programming.

Just as there was unanimity among the Board and staff over the appropriateness of "Keene" and "Housing" in our name, there was universal uneasiness about the word "Authority". "Authority" conveys a sense of power over another, unilateral decision-making and bureaucracy. The word, particularly in the context of an organization delivering services to traditionally disenfranchised populations, suggests a power structure that consumers need to navigate rather an organization that serves and advocates for them. The word puts us in a role disconnected from, rather than partners in, our residents' lives.

As evidenced by our program designs dating back to our first year in MTW, and consistent with our community's expectations of us, we see ourselves as advocates for our families, not authorities over them. Our job is to facilitate not dictate and we want this to come through in everything we do. Taking all of these things into consideration, and after a great deal of thoughtful deliberation, the Board of Commissioners resolved to change our name from Keene Housing Authority to simply Keene Housing at their May, 2013 Board meeting.

The name change does not signify any diminution or modification of our legal powers or status, but instead memorializes our commitment to service and innovation. We are here to help our region's low-income families, elders and disabled individuals live and thrive in vibrant, high quality, affordable housing. We accomplish this through forward-thinking program design, strategic partnerships, thoughtful development and most of all intellectual curiosity and an unwavering dedication to our mission.

## MTW AT KEENE HOUSING

Since 1965, Keene Housing (KH) has played a vital role in promoting a stronger Monadnock region by providing housing assistance and supportive services to some of our community's most vulnerable low-income neighbors. In recognition of our high performance and established reputation for innovation, Keene Housing became one of the initial 12 public housing authorities (PHAs) chosen to participate in the Department of Housing and Urban Development's (HUD's) Moving to Work (MTW) demonstration program in 1999.

MTW offers PHAs the opportunity to design and test innovative, locally sensitive initiatives aimed at not only providing more, higher quality affordable housing than is possible outside of MTW, but at finding new ways of providing the educational, vocational and social supports low-income households need to improve their socio-economic condition. By jettisoning many of the most burdensome sections of the Code of Federal Regulations, MTW PHAs are free to explore a host of financial, programmatic and development strategies that non-MTW agencies can only dream of. MTW flexibility allows us to reject a one-size-fits-all approach to helping the families we serve and instead allows us to take advantage of, and react to, the unique opportunities and challenges we face here in New Hampshire's Monadnock region.

While we use our MTW authority in ways that are uniquely ours, we do so making sure that each MTW activity we develop is designed to accomplish at least one of the three statutory objectives established for MTW when Congress created the program in 1996:

- 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.

Consistent with these statutory objectives, Keene Housing relies upon three guiding principles to inform how we approach our work:

*To break the intergenerational poverty cycle, we must invest in individual choice and control.*

*—Tiziana C. Dearing, CEO Boston Rising*

## Choice

- Support Keene Housing-assisted families in their efforts to achieve financial security by offering a menu of housing, program, and service options that provide individualized assistance to each household's unique needs and pursue opportunities to develop, on our own or in partnership with others, new affordable housing opportunities for our region's low-income families.

## Collaboration

- Create a spirit of collaboration which links Keene Housing, KH-assisted families, local organizations, and the public into a healthier, more resilient, more supportive community.

## Independence

- Provide residents the supports they need to take control of their lives and attain the goals they set for themselves – being sensitive to the reality that “success” is relative. One family may succeed by no longer needing our help at all, while another may succeed simply by having a safe, affordable home to grow old.

In order to meet these objectives and principles, Keene Housing believes that ongoing program evaluation is crucial to understanding how our programs impact participants, the community, and the organization. In addition, Keene Housing understands its role as a MTW agency in the larger affordable housing discourse – a role that comes with the responsibility of transparency both to policy makers and the public. To better understand and inform our programs and their future, Keene Housing spent much of 2013 evaluating our ongoing MTW activities.

The following plan presents an overview of Keene Housing's existing MTW activities and includes proposed changes to, and new, initiatives for implementation during the 2014 Fiscal Year which begins January 1, 2014.

## OVERVIEW OF KEENE HOUSING'S 2014 PRIORITIES

This year marks the fifteenth year of Keene Housing's participation in the MTW program. MTW's regulatory and financial flexibility has helped Keene Housing make great strides in increasing and improving the quality of affordable housing in the Monadnock region, and to support low-income families in their journey to greater financial security. This work has continued – in no small part thanks to MTW – in the face of historic budget pressures.

In our continuing effort to meet the statutory objectives of the MTW programs, Keene Housing plans for 2014 include:

- Leveraging partnerships with outside local, state, and national agencies to expand programmatic and housing options for the region's most vulnerable households.

- Reinvigorating and recapitalizing resident services programming to help work-able adults and their children realize their economic and educational goals.
- Modifying existing MTW activities to allow us to assist more families in more substantial ways.
- Ensuring the long term financial viability of Keene Housing through on-going administrative reforms, business system refinements and when appropriate, asset repositioning.
- Engaging in organizational and staff development to better serve our residents and community.

As demonstrated throughout this plan, although Keene Housing is proposing small modifications to many of its MTW activities, all show signs of success. The changes to MTW activities that are proposed are in response to our growing understanding of the reality of the new, post-recession economy and our belief that change begins with individual choice. We believe that with continued support of the MTW program the lessons learned over the past years can create a new paradigm for low-income housing assistance, one that provides people the tools they need to become financially secure while using every dollar in the most efficient and economically responsible way possible.

## OVERVIEW OF KEENE HOUSING'S MTW ACTIVITIES

MTW Activity	Approved	Status	Change Proposed
Eligibility Administration	1999	Active	Yes
Housing Quality Standards (HQS) Inspections	1999	Active	No
Rent Reasonableness	1999	Active	No
Stepped Subsidies (Formerly Housing Assistance Coupon)	1999	Active	Yes
Resident Self-Reliance Program	1999	Active	Yes
Shelter Housing Assistance Coupon Program	2000	Active	No
Alternative Recertification Schedule	2005	Active	Yes
Standard Deductions	2006	Inactive*	No
MTW Homeownership Program	2008	Active	No
Project-Based Voucher Program (Formerly Project-Based Coupons)	2008	Active	Yes
Restrictions on Section 8 Portability	2008	Active	Yes
Affordable Housing Preservation	New 2014		

\* Eliminated in 2014

# GENERAL OPERATING INFORMATION

## WHO WE SERVE

During Keene Housing’s fifteen years in the MTW program, we have increased the number of families served from 636<sup>1</sup> to over 1,000 through the expansion of our Housing Choice Voucher (HCV), Project Based Voucher (PBV), Mainstream, and Non-Elderly Disabled (NED) Voucher programs, Low Income Tax Credit rural development properties, our shelters, and the properties we manage on behalf of local non-profits.

Keene Housing serves 1,567 people in 863 households. Elderly/disabled households are the largest population we serve with disabled household members accounting for 48% (749) of the total population. 28% (245) of our assisted households have one or more child at home and children account for the second largest portion of our population served at 32% (495). Households headed by a single parent are most common, making up almost 72% (176) of all households with children. Somewhat surprisingly the number of male versus female headed households are split evenly with male-headed households being slightly more prevalent (52% versus 48%).

## Employment and Earnings

Over a third of the households we serve are Extremely Low Income (ELI) (<30% AMI) even though 50% of individuals, not receiving assistance through our shelter program, are employed and earn a median gross income of \$22,572. Not surprisingly households on fixed incomes earn significantly less with elderly households earning about \$17,544 annually and the median income for disabled sitting at around \$12,660.

## Demographics Keene Housing Assisted Household

	HCV	Housing	Total	Percent
<b>General Information</b>				
Households	677	186	<b>863</b>	
with children	183	62	<b>245</b>	28%
Individuals	1,222	345	<b>1,567</b>	
Employed	720	66	<b>786</b>	50%
<b>Gender</b>				
Males	491	148	<b>639</b>	41%
Females	729	197	<b>926</b>	59%
<b>Populations*</b>				
Children	379	116	<b>495</b>	32%
Elderly	285	73	<b>358</b>	23%
Disabled	652	97	<b>749</b>	48%
<b>Race</b>				
White	666	317	<b>983</b>	62.7%
American Indian	5	1	<b>6</b>	0.4%
Asian	6	3	<b>9</b>	0.6%
Black	9	3	<b>12</b>	0.8%
Pacific Islander	1	2	<b>3</b>	0.2%
Not Available			<b>540</b>	34.5%
Hispanic/Latino	7	7	<b>14</b>	0.9%

\*Children and Elderly populations may include disabled individuals

<sup>1</sup> Keene Housing Authority. Moving to Work: Keene Housing Authority Spectrum Demonstration Application (HUD approved 1997)

## HOUSING STOCK INFORMATION

Keene Housing owns or manages 583 units of affordable housing including two homeless shelters, three HUD multi-family properties, six LIHTC properties, two homes for chronically mentally ill, and ten properties that were converted from public housing to Project Based Vouchers in 2009. Of our properties that are not former public housing, MTW plays an integral part in their management. For example, many of our LIHTC properties include MTW PBV subsidies, our shelters utilize shallow subsidies permitted through our Shelter Housing Assistance Coupon (SHAC) activity, and in 2014 we anticipate converting Meadow Road to MTW PBVs through our Affordable Housing Preservation initiative. For a clearer picture of which units fall under our MTW programs, please see the table provided below.

In October 2013 we celebrated the grand opening of Brookbend Family Housing. The first units went on-line in August 2012 and we expect all 75 units fully leased-up in early 2014. Brookbend is funded through a combination of subsidies including LIHTC and MTW PBV assistance.

In 2013, we anticipated beginning the demolition and replacement of Wedgewood Duplexes in Winchester, NH. While not currently part of our MTW programs, the replacement of this aging property is integral to the agency-wide health of our housing stock and programs. Unfortunately, we were unable to secure Low-Income Housing Tax Credits for this project in 2013. A new round of Community Development Block Grants (CDBG) and LIHTC applications were submitted in June 2013 and we expect a decision sometime last quarter 2013.

### Keene Housing Portfolio

#### Main Developments

	Units	Housing Type/Program	Description
Keene Affordable Housing Properties (KAHP)	210	Family/MTW project-based subsidy ALL UNITS	Previously public housing. Range of units and building styles from efficiencies to 4 bedrooms – 14 accessible units

#### Multi-Family Section 8 (All Non-MTW)

	Units	Housing Type/Program	Description
Meadow Road	18	Family/Multifamily	2 and 3 bedroom townhouse style units – 2 accessible units
Wedgewood Duplexes	30	Family/Multifamily	2 and 3 bedroom duplex units
Central Square Terrace	90	Senior and Disabled/Multifamily	Efficiencies and 1 bedroom units in high rise with elevator – 9 accessible units

*Low Income Housing Tax Credit (LIHTC) Properties (Any units not receiving MTW PBV subsidy are serviced through Non-MTW programs)*

	<b>Unit</b>	<b>Housing Type/Program</b>	<b>Description</b>
Riverbend (Includes HOME Units)	24	Family/MTW project-based subsidy ALL UNITS	2 and 3 bedroom townhouse style units – 2 accessible units
Evergreen Knoll (Includes HOME units and USDA Subsidy)	32	Family/MTW project-based subsidy 3 UNITS	2 and 3 bedroom townhouse style units – 4 accessible units
Stone Arch Village Senior Housing	33	Senior/MTW project-based subsidy ALL UNITS	1 and 2 bedroom units in high rise with elevator – 3 accessible units
Stone Arch Village Family Housing	24	Family/ MTW project based subsidy ALL UNITS	2 and 3 bedroom townhouse style units – 2 accessible units
Brookbend East	40	Family/MTW project-based subsidy 11 UNITS	2 and 3 bedroom units in townhouse style units - 2 accessible units
Brookbend West	35	Family/MTW project-based subsidy 10 UNITS	2 and 3 bedroom units in townhouse style units - 2 accessible units

*Special Programs – CDBG & Shelter*

	<b>Units</b>	<b>Housing Type/Program</b>	<b>Description</b>
Ash Brook	24	Family (Non-MTW)	1 bedroom units
Emerald Street House	10	Section 202/Chronically mentally ill (Non-MTW)	Group home with shared bathroom/s and common spaces. Manager unit on site.
Fairweather Lodge	6	Chronically mentally ill (Non-MTW)	5-bedroom and 1-bedroom apartment with shared bathroom and common spaces.
Cottage Street	3	Family/ MTW project-based subsidy ALL UNITS	2 and 3 bedroom units – 3 accessible units
Water Street Family Shelter	1	Shelter Housing/MTW SHAC	SRO
139 Roxbury Street Shelter	1	Shelter Housing/MTW SHAC	SRO
<b>Total Units</b>	<b>583</b>		

## KEENE HOUSING VOUCHER PROGRAMS<sup>2</sup>

	Units
Moving To Work (MTW) Housing Choice Voucher (HCV) Program	587
Mainstream-5 Voucher Program	50
Non-Elderly/Disabled (NED) Voucher Program Administered under MTW Policies	100
<b>Total</b>	<b>727</b>

## PLANNED LEASING INFORMATION

Keene Housing does not own any public housing units. Even with continuing budgetary constraints KH expects to issue Housing Choice Vouchers (HCVs) to households on our waiting list again in 2014 and is anticipating a utilization rate of 102% by the close of FY 2014. In addition, KH plans on adding 3 new project based vouchers (PBV) at our Cottage Street property upon unit turnover and 18 new PBVs at Meadow Road through the Affordable Housing Preservation initiative.

KH anticipates significant underfunding of its Non-Elderly Disabled (NED) program again in FY 2014. Despite being denied set aside funds for which we believe we were eligible in FY 2013, KH will fund the FY 2014 NED shortfall in anticipation of set aside funding in 2014. This is not however, a sustainable model and KH will likely be forced to let the NED program shrink via attrition in FY 2015 if set aside funds are not made available to cover the FY 2014 shortfall.

### Anticipated Leasing Information

	Total	Comments
MTW HCV units leased in the Plan year	598	Assumes 102% monthly utilization (UML) rate
Mainstream-5 Voucher Program	50	Assumes 98% UML Rate
Non-Elderly/Disabled (NED) Voucher Program Administered under MTW Policies	100	Assumes 98% UML rate

## WAITING LIST INFORMATION

**Anticipated changes to the waiting lists for KH owned and managed properties:** Keene Housing's current waiting list policy allows households to apply to any open property or HCV list. At this time, all lists are open and Keene Housing has no plans to close any property-based or HCV

<sup>2</sup> \*MTW HCV units includes MTW Project Based Vouchers

waiting lists. Waiting lists are purged annually, with the last purge having occurred in February 2013. During the purge, applicants receive a letter asking them to confirm they would like to remain on the waiting lists. Applicants have 30 days to respond. Those who do not are removed from the list.

Waiting List by Bedroom Size (yrs)	Studio	1 BR	2 BR	3 BR	4 BR
Family	2.0	3.3	2.1	2.2	4.6
Elderly	1.0	3.0	7.0	N/A	N/A

**Anticipated changes to the waiting lists for Housing Choice Vouchers (HCV):** Keene Housing manages separate waiting lists for our HCV and Mainstream programs. NED vouchers are administered from the HCV waiting list for those households who meet program requirements. We are not considering closing any waiting lists at this time. Currently 270 households on the HCV waiting lists are also on one or more property waiting lists.

Waiting List by Program	Current Applicants	Wait Length (yrs)
Distinct Applicants	637	
Total Applicants	3063	
Mainstream	182	2.0
MTW Housing Choice Vouchers (formerly HAC)	329	4.3
Project-Based Voucher*	1884	2.5
Non-Voucher Assistance	668	2.0

\*Based on applicants on KAHP property waiting lists with PBV units

**Anticipated changes in the number of families on the waiting lists:** The waiting lists continue increasing due to low turnover rates and increases in the number of applications received. From 2011 to 2012, the waiting list grew by 24% for the HCV programs and 35% for KH owned and managed properties. Between January and April 2013, an additional 160 HCV and 181 Housing applicants were added to the waiting list. During the same period only 26 vouchers and 35 units were given to waiting list applicants. With Brookbend coming fully on-line and the issuance of approximately 9 new Housing Choice Vouchers at the end of FY 2013, we anticipate a slight decline in the number of households on the waiting list but overall little change in wait times.

# NON-MTW RELATED INFORMATION

## HEADING FOR HOME (H4H)

The Heading for Home Program (H4H) offers eligible participants the option of buying a home with mortgage payment assistance through the MTW Housing Choice Voucher (HCV) program. Eligible applicants for H4H must be eligible for a HCV. 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 Individual Development Accounts (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.

Keene uses 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 (see Eligibility Administration and Homeownership Activity). The purpose is to provide an incentive and reward for RSR families who were successful in the program. KH does not want to penalize families who are able to increase their income during the program by denying them homeownership opportunities.

## BUILDING BRIDGES

Building Bridges is Keene Housing's youth services program. The program currently works with approximately 25 school aged youth, ages 5 through 10 years old. Building Bridges offers after school programming at Family Activity Centers (FACs) located at our North and Gilsum and Harmony Lane communities. Daily activities focus on social and educational programming known to help reduce juvenile delinquency and encourage community engagement.

Research shows that children with a developed sense of self and commitment to education are more likely to succeed in school and break the cycle of intergenerational poverty<sup>3</sup>. Building Bridges uses homework labs, community service, and regular events to encourage a positive attitude towards education, build a sense of self-respect, and develop community connections.

Homework labs provide 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 provide a dual role of tutors and positive role models for students.

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<sup>3</sup> Pajares, Frank, and Dale H. Schunk. "Self-beliefs and school success: Self-efficacy, self-concept, and school achievement." *Perception* (2001): 239-266.

Community service builds community connections by teaching youth that their commitment to the community matters. Youth coordinated service activities focus on neighborhood needs, such as community gardens, Clean-up Days, and Youth and Senior game days. Family events and meals at activity centers encourage positive interactions between youth and adults as they plan, prepare, and serve community members together. Youth also spend time volunteering at local community non-profits such as the Humane Society and the local Grey Hound rescue organization – Fast Friends.

Finally, regular events provide students a variety of activities which help build self-respect and an appreciation for a healthy lifestyle. The Monadnock region's natural spaces provide youth with a variety of seasonal outdoor activities from hiking to apple picking. Community partnerships have also introduced youths to a variety of healthy activities and new experiences while reinforcing the importance of community to the youth. In 2013, community partners provided dance lessons, Yoga for Peace, and a visit from a traveling zoo.

Building Bridges is part of our wrap-around resident services designed to help KH-assisted families attain financial stability and break the intergenerational poverty cycle. Part of our renewed commitment to resident services in FY 2014 is looking for ways to expand our youth program to include programming for other age groups. In 2013 Keene Housing entered into conversations with the Keene school district and Ready! for Kindergarten – an pre-kindergarten school learning program – about ways to bolster early childhood education in Keene. Thanks to these conversations, Keene Housing began hosting educational programming for our children, ages 2 to 5 years old, at two of our FACs in the Fall of 2013. If the program is successful, we hope to expand to all our preschool aged residents over the next 2-3 years.

Ready! for Kindergarten is the first step in our multi-year effort to transform Building Bridges into a comprehensive educational and developmental curriculum for all children living in Keene Housing properties. Through a combination of staff-led programming and community partnerships we will give kids the social and educational tools needed to succeed in school, and beyond.

## ENERGY EFFICIENCY

As operating costs climb, it is essential that low-income multifamily property owners seek ways to cut expenses without diminishing the quality of the housing we provide, or passing increased costs on to our low-income tenants; increasing energy efficiency is one of the best ways of accomplishing this. In summer 2013, with help from an energy consultant and Keene State College Energy Interns, we began collecting data on the energy consumption at each KH-owned property. We will be finished collecting baseline data in early 2014, at which time we will begin using them to create a multi-year energy improvement strategy. It is our intent to use combinations of building envelope improvements; and energy saving and energy generation investments to reduce long-term costs, as well as the portfolio's carbon footprint.

## POLICY + TECHNOLOGY LAB – WEST

In 2013, Keene Housing partnered with the Cambridge Housing Authority (CHA) to create the Policy + Technology Lab – West. The Lab provides college and university students from Massachusetts, New Hampshire, and Vermont an opportunity to work on a variety of projects while gaining real-world work experience. The partnership between Keene Housing and CHA will allow CHA interns opportunities to work and learn in a rural environment and Keene Housing interns a chance to do the same in an urban setting. The Lab offers on-going paid or for-credit internships to students with specific research aims or interests in the following fields:

### *Communication*

Keene Housing understands the importance of improving its communication with the public. In summer 2013, a student intern worked with staff on projects related to Keene Housing’s rebranding campaign, new website development, event planning, and growing our social media presence. Future Communication interns will take-on a series of ongoing projects including website and social media upkeep, press releases and communications collateral development.

### *Energy and Sustainability*

Our Energy and Sustainability interns played a pivotal role in our energy audit, which began in summer 2013. Student interns worked closely with staff and our energy consultant in data gathering and analysis, creating the road map for our long-term energy strategy. Once completed, future Energy and Sustainability Interns will be part of the team tasked with implementing the strategy and tracking its efficacy.

### *Policy and Technology*

The Policy and Technology internship is designed to give students experience in program administration or policy design and implementation. Projects provide interns a range of experience, from data analysis to working on policy development to GIS mapping.

## PUBLIC ENGAGEMENT

Traditionally, residents’ interaction with staff revolves around each resident’s property manager or resident services coordinator (RSC). In Fall 2012 we introduced the first series of annual Listening Tours at our owned and managed properties. The Listening Tour are open forums for residents and HCV participants to voice their concerns and compliments directly to our Executive Director and management team. The 2012 tour provided insight into concerns residents had about our services and property maintenance. Residents’ insights prompted many of the site improvements and resident service reforms found in this Plan.

Keene Housing recognizes that the work we do affects not only our residents but the community as a whole. The conventional public comment process – with its formalized structure of a single traditional public hearing – lacks the accessibility that initiates true public engagement<sup>4</sup>. As a first step in getting residents and the public more engaged in the MTW planning process, Keene Housing conducted six (6) public meetings on this Plan. Meetings were held at community rooms throughout our properties during evenings and at mid-day to provide multiple opportunities for the public to provide their input on plans for the coming year. Since the public comment period occurs during the same time as our Listening Tours, Keene Housing decided to combine the meetings with the tours with the hope of enticing more people to engage. We also heavily marketed the public hearings, using both the traditional print and social media to educate and inform the public of the public comment period. The combination seems to have created the desired effect, while only one individual attended last year’s public hearing, this year more than 80 attended a public hearing. Over the next year we will test other ways to expand public engagement.

## PROPERTY IMPROVEMENTS

A common theme from the 2012 Listening Tour was resident dissatisfaction with our properties’ curb appeal. In response, Keene Housing initiated modernization projects at two of our elderly/disabled properties and grounds improvements across the portfolio – including better playground equipment at our North and Gilsum family property.

While cleaning up and improving the properties are key pieces to improving resident satisfaction, we also believe that improving our maintenance response time is just as important. This year our maintenance department adopted a grading system set to measure work-order turnaround times. Maintenance set a very high bar for non-emergency turnarounds; turnaround less than 7 days is required to receive an “A”. Since initiating this grading system, the department has consistently maintained an “A” average on both work order and unit make ready times.

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4 Kettering Foundation, *Painting the Landscape: A Cross-Cultural Exploration of Public-Government Decision-Making* (Thornton, CO: International Association for Public Participation, 2009), 11.

# LONG-TERM MTW PLAN

Thanks in large part to the administrative savings realized through Keene Housing's various MTW initiatives, as well as the financial health of our Low Income Housing Tax Credit (LIHTC) and Project Based Voucher (PBV) properties, Keene Housing is in the enviable position of being able to think not about how we will survive the current federal funding crisis, but how we will continue to grow despite it. In the coming years we will concentrate on the following areas:

## *The Properties*

While the majority of our stock, particularly the newer LIHTC properties are in excellent condition, we do have a few properties that need significant capital reinvestment. In the coming years we will, using MTW flexibility wherever possible, make significant investments in Bennett Block, Central Square Terrace, and as described later in the Affordable Housing Preservation Initiative, Meadow Road. If our application for LIHTCs and Community Development Block Grant Funds is successful, Wedgewood Apartments will be sold to our long-time community partners, Southwestern Community Services who will demolish and rebuild the aging property, thereby ensuring its long-term viability and affordability.

Beginning in FY 2014 curb appeal and routine maintenance will be of paramount importance. Improved landscaping, lawn maintenance, snow removal and play spaces for children will be critical management indicators and staff will be given adequate resources to make sure the properties look their best. Keene Housing properties will not look any different than any other multi-family rental properties in town. Our residents will feel pride in where they live just as our staff will feel proud of the bricks and mortar legacy they are entrusted with stewarding.

## *The Money*

Keene Housing will continue pushing to reduce operating costs without diminishing the quality of the housing or programs we provide to our residents and voucher holders. To accomplish this we will constantly look for opportunities to use emerging technologies to reduce costs, whether it be by building a photo-voltaic and wind turbine farm, or simply by finding smarter ways to purchase office supplies. We will always seek opportunities for reducing debt service and will leverage our property management and development expertise to aggressively seek out ancillary revenue streams so long as doing so is consistent with our mission and goals. We do all of this not for its own sake, but because we recognize that every dollar we save is a dollar we can use to improve the quantity and quality of the housing and programming we provide to the families we serve.

## The People

We hope that even a casual reader of this year's Annual Plan sees a theme arising. That theme is our re-commitment to helping the people we serve help themselves. Whether it be modifications to the Resident Self Reliance program or improvements to the Stepped Subsidy initiative, or the beginning of an exponential expansion of Building Bridges, Keene Housing's primary focus, and investment, in the years ahead will be on our residents and voucher holders, with a special emphasis on the children.

We take this challenge on with eyes wide open; fully recognizing that so-called "self-sufficiency" is a program area fraught with obstacles both practical and philosophical. As budgets for resident services have dried-up and budget cuts have forced housing authorities into survival mode, many housing authorities' resident services programs have atrophied or simply disappeared. It is also true that helping low-income families make real strides towards greater economic independence is hard; there is no one-size-fits all solution. Each family struggles with its own, unique set of difficulties, complications and roadblocks. We also recognize that moving families even a little way towards greater independence is expensive, and often disappointing. But despite all of these perfectly good reasons not to bother, we are going to keep trying. In fact we are doubling down on our families, and especially the kids. We know it will be hard. We expect to be criticized by some for the time, energy and resources we will expend in this effort.

## The Key

None of what we have outlined above will be possible if Keene Housing's Moving to Work Agreement is allowed to expire in 2018, the year the current agreement ends. While we acknowledge and support the broad efforts in Congress to expand and make MTW permanent, we also recognize that Congress has more pressing issues to tackle and, at least lately, a tendency to move very slowly. Therefore Keene Housing will work hard in partnership with other MTW agencies, HUD staff, and our Congressional delegation to insure that our current MTW agreement is renewed and extended for at least another ten years beyond 2018. All we have accomplished to date, and all we hope to accomplish in the years to come, is reliant upon the flexibility and regulatory relief MTW provides us; securing an extension is our most pressing goal.

# PROPOSED MTW ACTIVITIES

## 2014.01.HC

### AFFORDABLE HOUSING PRESERVATION INITIATIVE

In FY 2014 Keene Housing will implement its Affordable Housing Preservation Initiative. Building on the successes of similar initiatives at other MTW Agencies, this initiative will more effectively use the subsidy provided by the Enhanced Voucher program (Section 8(t) of the U.S. Housing Act) to preserve properties that would otherwise either continue to suffer from inadequate funding, or convert to market rate. This initiative will utilize HUD's enhanced voucher program to protect affordable housing stock by project basing eligible units for 15 years.

There are several thousand affordable units in New Hampshire at risk of being lost to owner opt-outs, including Meadow Road Apartments in Keene. Meadow Road consists of 18 affordable units and provides housing to 6 elderly/disabled and 12 family households. This Multi-Family Section 8 property is in need of significant capital improvements including new roofs, HVAC systems, energy upgrades and repaving. Additionally there is no community or play space available to Meadow Road residents. Contract rents at the property do not support its capital needs, and as a result Meadow Road's physical condition, financial soundness, and resident satisfaction — as indicated by its Real Estate Assessment Center (REAC) scores — continue plummeting. Project basing this property will significantly increase its income, thereby making it easier to fund its long-overdue capital needs.

#### *Program Description*

When owners who are opting out agree to participate in the Affordable Housing Preservation Initiative Keene Housing will extend the property's affordability by entering into a 15 year project-based contract once the enhanced vouchers are received from HUD. The owner must agree to a 15-year contract period. The payment standard will take the owner's projected capital needs over the contract period, and other appropriate factors into account to make sure that contract rents are both reasonable and attract owners who would otherwise opt-out of these expiring contracts. Once the project based contract is executed Keene Housing will convert the enhanced vouchers into MTW project-based vouchers using our existing MTW authorization to project base up to 100% of the property's units.

Once an owner has given notice of his/her decision to opt-out of their existing Housing Assistance Payment contract in exchange for participation in the Affordable Housing Preservation Initiative, Keene Housing will meet with residents to explain how the initiative works, and how it may affect them and the property in which they live. After educating residents about the implications of, and rationale for participating in Keene Housing's Affordable Housing Preservation Initiative, Keene Housing will give existing residents the choice to retain their Enhanced Voucher or to allow their

unit to be Project Based. As evidenced by the frequency of resident meetings and extensive public engagement we undertake around all of our MTW and non-MTW activities, Keene Housing recognizes the importance of making sure that residents are well informed about decisions they make that can affect their housing, their families or their future.

The City of Keene is relatively small, and there are no organizations that could reasonably take on responsibility for educating residents about the Preservation Initiative other than Keene Housing staff. However, if the Meadow Road conversion successfully preserves the property's affordability and results in site improvements, it is possible that other property owners may be interested in participating in the Preservation Initiative. Keene Housing will always seek out local organizations to help educate residents about the Preservation Initiative and residents' right to retain Enhanced Vouchers, should they decide to do so, but will rely on Keene Housing staff for the educational piece when no suitable partner can be found.

Keene Housing will schedule a certification appointment with property residents to determine eligibility under the MTW project based voucher requirements and the appropriate subsidy program for the household – Stepped or MTW Income-based. Households in preserved units will be eligible to receive a mobile voucher consistent with Keene Housing's PBV Mobility Eligibility policies.

### *Statutory Objectives*

This initiative addresses MTW's statutory goal of increasing housing choices for low-income families. By extending the life of affordable projects, and reducing rent burdens, the region will be able to offer increased affordable housing opportunities over time as properties that were set to lose their affordability are preserved for at least an additional 15 years.

### *Anticipated Impact*

There are many advantages of this initiative for residents. Currently, Meadow Road residents pay minimum rent or 30% of their income towards rent. The traditional Enhanced Voucher could have residents paying more than 30% of their income. Once adjustments to the stepped subsidy activity (see Ongoing MTW Activities: Stepped Subsidies, page 28) are implemented, at least 12 current Meadow Road households will become Resident Self Reliance participants and will only pay 20% of their gross income for rent for 2 years, with no rent increases tied to increased income; all while being provided the tools and support needed to increase their economic independence. The remaining 6 households will have the option of entering the RSR program or remaining with their current income-based subsidy calculation method, in which case there would be very few changes to their income calculations and rent burdens.

Meadow Road's current residents will also benefit from living in a property that is rapidly improving as long-overdue capital improvements are addressed. A capital needs assessment was completed in FY2013 in anticipation of this initiative's approval.

## Applicable Standard Metrics

### HC#2: Units of Housing Preserved

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI as a result of the activity (increase).	0	18		

### HC#4: Displacement Prevention

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	18	0		

## Data collection process

Keene Housing will track the number of project-based units through this initiative, the contracted rent as a percentage of our Payment Standard, the length of each PBV contract, and the actual costs of this program including replacement or rehabilitation costs of units that have been preserved if available. This data will be used to report on the efficacy of this activity.

## MTW Authorizations

Attachment C Section D(1)(a),(b),(e),(f); Section D(3)(a); Section D(7)(b)(c)

## 2014.02.CE MEDICAL DEDUCTION THRESHOLD

Keene Housing uses the 3% threshold for unreimbursed medical expenses of elderly and disabled households. In FY 2014 Keene Housing will implement its Medical Deduction Threshold initiative. The initiative will align our threshold with the Internal Revenue Service's, by increasing the

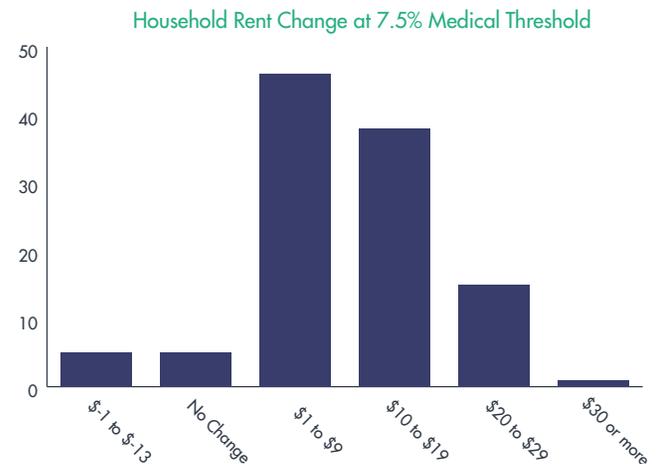
threshold for unreimbursed medical expenses to 7.5% of gross income. With the anticipated changes to health care costs upon implementation of the Affordable Care Act (ACA), we foresee a reduction in the out of pocket expenses for most of this population. Increasing the medical expense threshold will reduce the hidden costs of indirectly subsidizing residents' medical expenses, while still providing an adequate safety net for those families with unexpected medical costs.

### Statutory Objectives

This initiative addresses the cost effectiveness statutory goal. Currently, only 28% (110) of our elderly and disabled households claim unreimbursed medical expenses. The higher threshold will provide Keene Housing a HAP savings of almost \$13,000 a year, without putting any unreasonable pressure on affected household's TTP.

### Anticipated Impact

The graph to the right provides an overview the anticipated impact the higher medical threshold will have on the 110 households who claimed unreimbursed medical expenses in FY 2013. 76% (84) of affected households will see an increase in rent between \$1 and \$19 while 10% (10) will see a decrease or no change to their rent. The remaining 15% (16) of households will see a more substantial increase of \$20 or more (including 1 household with an increase of \$39 in TTP). It is important to note that those households with the highest TTP increases also have the highest incomes and in some cases assets in excess of \$100,000. For a complete impact analysis, please see Appendix II: Medical Deduction Threshold.



### Hardship Policy

The Medical Deduction Threshold activity includes a hardship policy to help those who experience hardship due to an unanticipated increase in medical expenses. In these cases, households have two avenues available. Households in the Income Based Subsidy program may at any time request an interim recertification from their Tenant Assistance Specialist. In addition, while KH's Safety Net program has traditionally focused on our Stepped Subsidy Participants, KH will expand the Safety Net policy to include households experiencing a hardship as a result of this activity. Participants affected by this activity will be notified of the hardship options available to them at their next recertification.

## Standard Metrics

### CE#1: Agency Cost Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$1320	\$990		

### CE#2: Staff Time Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	110 hours	96 hours		

### CE #5: Increase in Agency Rental Revenue

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$176,077	\$180,487		

## MTW Authorization

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

### 2014.02.SS

#### ASSET EXCLUSION THRESHOLD

Currently Keene Housing excludes assets below \$5,000 from the income calculations for elderly and disabled household. In FY 2014 Keene Housing will implement its Asset Exclusion Threshold initiative. The initiative will increase our assets exclusion threshold from \$5,000 to \$50,000 and expand this threshold to include all households.

### Statutory Objectives

This initiative addresses the cost effectiveness statutory goal.

### Anticipated Impact

Analysis of this proposed change indicates an increase in HAP costs of approximately \$2,400 per year with an average tenant TTP decrease of \$1 per month. Currently, 90% (310) of our households have assets that do not exceed \$50,000. Under the current system, assets for these individuals are calculated and verified unless the household is elderly or disabled and has assets under \$5,000. The threshold will provide KH a net savings in staff time and agency cost which exceeds the cost in terms of increased HAP costs. For a complete impact analysis, please see Appendix II: Asset Exclusion Threshold

### Hardship Policy

The Asset Exclusion activity includes a hardship policy to help those who experience hardship due under the activity. In these cases, households have two avenues available. While KH anticipates no hardship to participants under this activity. All households experiencing a hardship are covered under KH's Safety Net program. In some cases, households may also request an interim recertification from their Tenant Assistance Specialist. Participants affected by this activity will be notified of the hardship options available to them at their next recertification.

### Standard Metrics

#### CE#1: Agency Cost Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$7440	\$5568		

#### CE#2: Staff Time Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	310	232		

### CE #3: Decrease in Error Rate of Task Execution

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Data unavailable at this time. KH will provide baselines and benchmarks in our FY 2014 Report			

### CE #5: Increase in Agency Rental Revenue

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$229,051	\$229,051		

#### MTW Authorization

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

# ONGOING MTW ACTIVITIES

Keene Housing has developed a numbering convention for MTW activities. The new convention comes at the suggestion of HUD and enhances readers' ability to track activities throughout the years.

The first number is the approval year. The second number refers to the activity number for that year. The letters indicate the statutory objective the activity relates to – HC relates to Housing Choice, CE relates to Cost Effectiveness, and SS refers to Self-Sufficiency. For example, an activity with the number 1999.03.CE would be the third activity approved in 1999 and would be related to the statutory objective “reduce cost and achieve greater cost effectiveness in federal expenditures”. In cases where an activity may fall under more than one objective, KH's primary goal in initiating the activity is used.

## 1999.01.HC ELIGIBILITY ADMINISTRATION AND HOMEOWNERSHIP

Keene Housing's Section 8 program eligibility was increased to 80% of AMI as part of its original MTW agreement. This expanded the number of programs available to low-income households by targeting households between 50% and 80% AMI. Recently HUD determined that eligibility for MTW Programs is set at 80% AMI thus rendering unnecessary the AMI increase portion of this activity.

**Keene Housing proposes modifying this activity by adding a \$100,000 asset threshold to its program eligibility guidelines.** When determining eligibility, KH will continue to calculate anticipated income by applying all applicable income sources as described at 24 CFR 5.609. If the income calculation results in 80% AMI or less, KH will apply the asset threshold as a second layer of eligibility determination. Under this new eligibility layer households with assets that total \$100,000 or more will not be eligible for assistance even if the household's anticipated income falls at or below the 80% AMI threshold. This threshold does not apply to inaccessible assets, such as irrevocable trusts. Households with inaccessible assets will have income from that asset applied to their household income for determining subsidy as if this threshold did not exist. Keene Housing would not apply this threshold to any families currently participating in our programs.

### MTW Homeownership Program

In 2005 Keene Housing created its Section 8 Homeownership program as part of its Public Housing Resident Opportunities for Self-Sufficiency (ROSS) grant under the Family Self-Sufficiency (FSS) program (now RSR). Over the course of administering the program, KH found that some households who expressed interest in homeownership were near 80% AMI when they began the process of meeting the program's requirements - such as homeownership counseling. As this process may take up to year, it was possible that the household may have income in excess of 80%

AMI. by the time a home was located and lender secured. To avoid penalizing homeownership participants who increased their income above 80% AMI while in the process of finding a home Keene Housing initiated, upon HUD approval of our FY 2008 Annual Plan, a flat subsidy for families in the program with incomes between 80% AMI and 140% AMI.

KH also applies the flat subsidy and 140% AMI ceiling to households after closing. Under the traditional HUD home ownership program, a non-elderly, non-disabled (work-able) 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. By utilizing both an income guideline and HUD's standard term limits, KH promotes the participants efforts to increase financial stability while holding the household 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 interims if their incomes changed. This policy change prevented at least two foreclosures.

No new Homeowner Vouchers were issued to date in 2013. Participation remains level at 9 households. It is noteworthy, however, that even with our assistance; it is very difficult for low-income families to afford the costs of purchasing and maintaining a home. The effectiveness of this program will be examined in FY 2014 and depending on the examination's outcome; the program may be suspended or terminated in FY 2015.

**Keene Housing is not proposing changes to the Homeownership portion of this activity.**

#### *MTW Authorization*

Attachment C Section D.3. Eligibility of Participants and Section D.8. Homeownership Program

### **1999.02.CE**

## **HOUSING QUALITY STANDARDS (HQS) INSPECTIONS**

The approval of the 2011 MTW Plan gave Keene Housing the ability to change the annual Housing Quality Standards (HQS) inspection requirement to a biennial HQS inspection requirement for units meeting HQS compliance at the initial or annual inspection conducted in 2011, including KH-owned and managed properties. In 2013 Keene Housing was authorized to discontinue HQS inspections in units held to a stricter inspection protocol – REAC/UPCS, State Finance Authority, etc.

**Keene Housing is not proposing any changes to this activity.**

#### *MTW Authorization*

Attachment C. Section D.5 Ability to Certify Housing Quality Standards

## 1999.03.CE RENT REASONABLENESS

Keene Housing eliminated rent reasonableness as part of its MTW Section 8 program in its original MTW Agreement executed in 1999. As such, KH does not test any unit for rent reasonableness for participants nor negotiate rents or hold a contract with landlords. KH believes that the determination of rent affordability (reasonableness) should be determined by the household according to the household's priorities and needs. Therefore, KH also eliminated the 40% affordability rule for its MTW programs. During the issuance briefing, KH staff educates applicants on how factors such as location, unit size, unit type, accessibility, amenities, tenant paid utilities, and maintenance contribute towards a reasonable rent. The education and support provided by KH continues throughout the applicant's housing search and during their rent negotiations with prospective landlords. In addition, households are also counseled during the briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing a unit that creates a high rent burden.

**Keene Housing proposes no changes to this activity.**

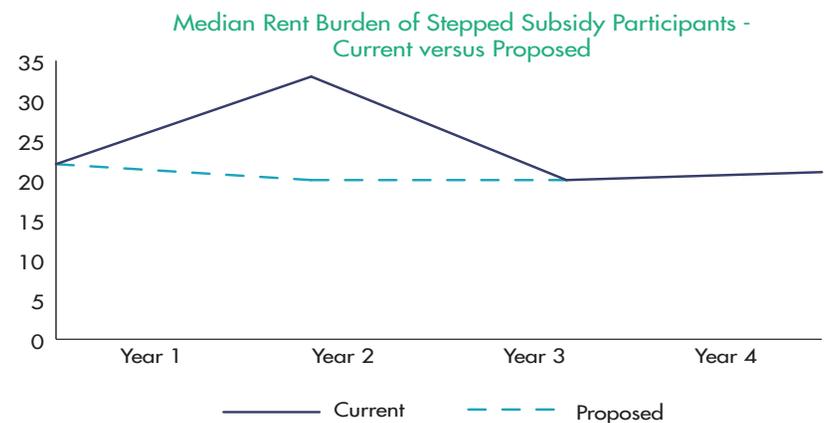
### *MTW Authorization*

Attachment C Section D.2 Rent Policies and Term Limits

## 1999.04.CE STEPPED SUBSIDIES

The Stepped Subsidy Program introduced a 3 stepped subsidy structure for all work-able and interested elderly/disabled families. All families receiving assistance under the Stepped Subsidy program are required to participate in the Resident Self-Reliance Program. Rather than charging residents 30% of adjusted income for rent, residents pay only 20% of gross income towards rent in the first year. The subsidy is then reduced at Year 2 – to 65% of Voucher Payment Standard (VPS) – and Year 4 – 45% of VPS (see table on next page).

Since 2008, Keene Housing has helped 90 stepped subsidy families move out of housing assistance and into self-sufficiency. Program evaluation of the Stepped Subsidy activity indicates, however, that under the current subsidy calculations the median rent burden increases dramatically – from 22% to over 30% - when families transition to the second subsidy step in year 2 (see graph).



The median rent burden then drops down again in year 3. Keene Housing believes this trend is counter to our goal of helping people attain financial stability. The jump in rent from Step 1 and 2 is extremely problematic for most households, who have only been participating in the RSR program for a year.

# 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

**In FY 2014, Keene Housing proposes to modify the Stepped Subsidy program by extending Step 1 to two years and reducing Step 2 to one year. This change will be phased in for all current Step 1 participants starting with their next step change occurring after April 2014; Step 2 participants will remain on their current track. As shown above, this change will provide a more level rent burden through the life of the program for most families. The proposed changes to the Stepped Subsidy activity would decrease the number of households experiencing rent burden at year 2, giving families more time to increase their income, and is more in line with the overarching goal of giving families time to increase their income without concern that their rent will immediately increase.**

Analysis shows that this proposed modification will cost Keene Housing \$41,460 per year in KH's Housing Assistance Payment (HAP) costs. However, long-term projections of HAP costs show that this increase is off set over the average length of a typical RSR household's stay in our programs as subsidies decline significantly in year 3 and beyond. In addition, Keene Housing also expects a significant savings in administrative

cost through a lower rent delinquency/termination rate and fewer Safety Net applications. For a complete analysis, please see Appendix II: Step Subsidy Program.

### **\$0 HAP Rent Burden Test**

In FY2013, Keene implemented a rent burden test to measure a family's progress towards self-sufficiency. When a household's gross rent burden is at or below 30% of gross income, Keene Housing reduces 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 change helped better align the metrics for measuring self-sufficiency with those used for hardship in the Safety Net program.

**Keene Housing proposes no changes to its rent burden test.**

### **Safety Net Program (Hardship Policy)**

As part of its Stepped Subsidy activity, Keene Housing administers a Safety Net program for all MTW PBV and HCV households. Safety Net provides eligible households experiencing a demonstrable financial hardship due to loss of income or other extraordinary circumstance with temporary relief from some or their entire rent portion. Eligibility Guidelines and program information are distributed at lease-up and regularly throughout program participation.

Households requesting Safety Net are provided three options for how Safety Net is applied to their individual situation: work/volunteer, payment arrangement, and a temporary subsidy increase through an interim adjustment. Participants who chose the work/volunteer option receive a rent credit towards their rent balance based on the number of hours worked. Work hours can be accrued though volunteer with Keene Housing, one of our community partners, or an approved location of the individual's choosing.

Keene Housing has found that managing volunteer work hours for Safety Net participants is administratively burdensome. As such, Keene Housing removed the work requirement from its Safety Net Policy. We have also discovered that residents in economic crisis are often going to other local government and non-profit entities for rent assistance rather than applying for Safety Net. While it is unknown how many families are reaching out to other organizations for assistance, our findings in the Stepped Subsidy analysis indicate that Safety Net is greatly underutilized. We have reached out to these organizations and requested that applicants for their assistance be steered back to Keene Housing as appropriate. We will also redouble efforts to educate voucher holders about the Safety Net Program.

**Keene Housing proposes no changes to the current Safety Net program.**

### *MTW Authorization*

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

## 1999.05.SS

### RESIDENT SELF-RELIANCE (RSR) PROGRAM

Originally part of Keene Housing's Spectrum program approved in our initial MTW plan, the RSR program provides service coordination and case management to help families become financially stable. The program is required for all non-elderly, non-disabled households enrolled in the Stepped Subsidy program. Elderly and Disabled households that elect to enroll in the Stepped Subsidy program are also required to participate in the program. The program serves approximately 100 households per year. Traditionally, RSR focused on four main program requirements for participants:

- Financial plan development
- Quarterly goal setting meetings
- Skill development activities
- Individual Service Training Program (ISTP) goal progression

Through feedback from Resident Service Coordinators (RSCs) and RSR participants, Keene Housing has chosen to revise the RSR program to provide participants more control and flexibility in attaining financial stability. To provide this more individualized service, Keene Housing proposes the following changes to the RSR program:

#### Curriculum

As of July 2013, Keene Housing staff has identified a set of five (5) Foundational Proficiencies for the new curriculum:

- Household Stability
- Wellness and Healthy Relationships
- Education and Training
- Financial Management
- Employment and Household Management

These five proficiencies closely align with competencies identified as necessary for personal success by several organizations focused on ending poverty including Crittenton Women's Union (CWU), Annie E. Casey Foundation (AECF), Center for Women's Welfare (CWW), and United Way. Keene Housing staff has developed specific skill sets necessary for participants to achieve success in each core area.

#### Individualized Goal Setting Plans

Within 30 days of lease-up, new participants will meet with a RSC for an assessment session. The assessment session will help identify the

foundational proficiencies in which the household needs the most support. The assessment meeting is followed by a goal-setting session where participants will develop an individualized 3-year plan to attain competencies in the identified areas. The plan will be comprised of specific goals and milestones including dates for completion of each milestone. The plan will take into account and set goals around changes in participant rent connected to Stepped Subsidy<sup>5</sup>. Upon completion of a 3-year Goal Action Plan, the participant and RSC will establish a new 3-year plan. With the focus on creating a more participant driven individualized plan for self-sufficiency, Keene Housing will be eliminating the mandatory quarterly group meetings, but will require quarterly one-on-one RSC meetings. Participants will be encouraged to join monthly round table sessions. These sessions will revolve around trainings, guest speakers, and discussion relevant to a specific foundational competency.

### Development Grants and Rent Credits

Keene Housing understands that cost is often a major barrier to individual success. In an effort to provide the best chance for our participants to reach their goals, Keene Housing will offer a Development Grant to help offset costs associated with attaining goals within a household's 3-year plan. The grant fund will be renewed yearly and the amount of the grant is contingent upon funding availability for the fiscal year. Examples of Development Grant approved uses include help with tuition, textbooks, exams, and even childcare.

In addition, Keene Housing is implementing rent credits for participants who make meaningful progress towards their 3-year goals. The amount of the rent credit varies dependent upon the significance of a participant's achievement and funding availability.

Both Development Grants and Rent Credits are available to all RSR participants and are contingent upon funding availability.

### Participant Compliance

Residents will be required to participate in quarterly progress meeting with their RSC to identify plan progression and any barriers to success. Participants who miss 3 progress meetings with their coordinator will be removed from the program and lose their subsidy. Keene Housing is proposing to discontinue the ability for households to apply for a waiver from RSR's programmatic requirements. Participants that have received an RSR programmatic waiver prior to implementation of this policy revision may be required to reenter the program if the household applies for hardship through Safety Net or is non-compliant with their lease or Obligations of the Family. In addition, as no new waivers will be issued, all households will be required to have an active 3-year plan as long as they are receiving housing assistance through the Stepped Subsidy program.

Keene Housing spent much of 2013 improving its data collection system for RSR. RSCs will use a new eLogic module within the Tracker database system for ongoing program evaluation.

**Keene Housing proposed no MTW-related changes to this activity.**

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5 RSR is the programmatic requirement for households receiving Stepped Subsidy.

## *MTW Authorization*

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

### **1999.06.HC SHELTER HOUSING ASSISTANCE COUPON PROGRAM**

Keene Housing began providing shallow subsidies to local service provider partners for shelter and transitional housing as part of its original MTW agreement. The program focuses on homeless and hard-to-house populations by providing both shelter and case management to help participants find stable housing. Once participants graduate from the program, they are given a preference for our Housing Choice Voucher program so they can find housing on the private market.

The first shelter, Roxbury Street, came under contract in September, 2001 and is managed by Southwestern Community Services, a local Tri-Cap agency. Currently Keene Housing provides shallow subsidies for 4 transitional housing programs – Roxbury Street men’s shelter, Water Street family shelter, Second Chance for Success, and Fairweather Lodge.

**Keene Housing proposes no changes to this activity.**

## *MTW Authorization*

Attachment C Section E. Authorizations Related to Family Self-Sufficiency; Section B.2 Partnerships with For-Profit and Non-Profit Entities; and Section B.4 Transitional/Conditional Housing Program.

### **2005.01.CE ALTERNATIVE RECERTIFICATION SCHEDULE**

#### **Elderly and Disabled Household Recertification Schedule**

In 2012, Keene Housing discontinued the triennial full recertification activity for all elderly and disabled households in the income-based subsidy program. Annual recertification are done by applying a Cost of Living Adjustment (COLA) to households receiving Social Security benefits and using HUD’s Enterprise Income Verification (EIV) system to verify income information. Participants self-certify income derived from assets.

**Keene Housing will further streamline the recertification process by no longer requiring elderly and disabled households with fixed income through Social Security (SS), Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), or the Aid to the Terminally and**

**Permanently Disabled (ATPD) program to participate in the annual recertification process. Instead Keene Housing will rely on the published Cost of Living Adjustment and Enterprise Income Verification system for each year's income calculation and notify participants of their new tenant share and subsidy amount. Included with this notice will be the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). Households with pension and assets above \$50,000 will continue with the current recertification process and schedule.**

Keene Housing understands the value of regular contact with HCV participants, particularly elderly and disabled participants, yet the certification process for many elderly and disabled households can be quite confusing and stressful to them. This change will remove the anxiety associated with recertification without losing track of, or touch with, our elderly and disabled participants.

Keene Housing will create an annual Wellness Response system to reach out to households and make sure their basic needs are met. The system will include informational material provided to households at lease-up and each year, when their rent is recalculated. Households needing assistance outside of housing will be referred to our local service partners. The Wellness Response team will follow-up with the household post-referral to determine whether or not the household's needs are being met. This program reform allows us to spend less time certifying income that rarely changes and more time making sure our elderly and disabled participants are getting the services they need to enjoy the highest possible quality of life.

With this change, we anticipate an administrative cost savings of nearly \$5,000 per year and a staff time reduction of 330 hours per year. Additionally there will be no HAP or TTP impact as the proposed change does not change the TTP calculation only the nature of how we gather the data. For a complete analysis, please see Appendix II: Alternative Recertification.

### **Stepped Subsidy Recertification Schedule**

Households participating in the stepped subsidy program currently participate in a recertification at each step change. Triennial certifications are in effect for those families who have reached the Step 3. During interim years households are required to complete self-certifications.

**Keene Housing proposes modifying this activity by discontinuing household participation in triennial certifications once households reach Step 3. After Step 3, Keene Housing will conduct an annual Enterprise Income Verification systems check on all stepped subsidy households for the purpose of testing if the family has met the \$0 HAP threshold and processing recertifications. It is important to point out however, that stepped subsidy households also participate in RSR. Changes to RSR, described earlier, include quarterly meetings with RSCs. Income data will be collected at these meetings. This data will be used both to ensure program eligibility and to measure each household's progress towards their long-term goals. In addition, RSCs will collect a new Authorization for Release of Information/Privacy Act Notice (HUD form 9886) should an existing release be facing expiration.**

### *MTW Authorization*

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

#### **2006.01.CE**

#### **STANDARD DEDUCTIONS (*DISCONTINUED*)**

In 2013, Keene Housing discontinued application of the standard deduction for households with no unreimbursed medical or childcare expenses. Under the proposed change to the medical deduction threshold (see Proposed MTW Activities: Medical Deduction Threshold) those households would no longer receive the standard deduction and no households would qualify for the standard deduction under the new threshold.

**Keene Housing discontinued this activity FY 2013.**

### *MTW Authorization*

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

#### **2008.02.HC**

#### **PROJECT-BASED VOUCHER PROGRAM (FORMERLY PROJECT-BASED COUPONS)**

Keene Housing continues to run its local Project Based Voucher (PBV) program, initially approved in 2008. This activity permits Keene Housing to waive regulatory caps on the total HCV inventory KH may project base. Currently, KH project-bases up to 60% of its available voucher funding. In addition, KH utilizes this activity to waive the required public process for project-basing units within KH owned and managed properties and the limitations on the percentage of units within a property that may be project-based.

In 2013, Keene Housing executed PBV contracts with Cheshire Housing Trust (20 PBV) and at Cottage Street (3 PBV). The impending completion of Brookbend will add 21 PBVs as late as first quarter 2014. Initially KH was considering project basing 3 units at Evergreen Knoll, however, we have decided not to project base in that property.

**Effective FY 2014, the percentage of voucher funding available for PBVs will increase at a rate equal to funding received for units project based through the Affordable Housing Preservation initiative.**

### *MTW Authorization*

Attachment C Section D(7); Attachment C Section D(1)e

2008.03.CE

## RESTRICTIONS ON SECTION 8 PORTABILITY

Keene Housing stopped absorbing ports from other PHAs in 2009. Keene Housing also restricts households from porting out of our jurisdiction to those households who provide demonstrable need for a reasonable accommodation or are the victim of domestic violence.

**Keene Housing proposes to permit porting out for those families who can show that such a move would demonstrably increase their financial stability, such as a new employment opportunity.**

*MTW Authorization*

Attachment C Section D.1. (g) Operational Policies and Procedures

# SOURCES AND USES OF FUNDING

KH anticipates significant underfunding of its Non-Elderly Disabled (NED) program again in FY 2014. Despite being denied set aside funds for which we believe we were eligible in FY 2013, KH will fund the FY 2014 NED shortfall in anticipation of set aside funding in 2014. This is not however, a sustainable model and KH will likely be forced to let the NED program shrink via attrition in FY 2015 if set aside funds are not made available to cover the FY 2014 shortfall.

	MTW Vouchers	NED Vouchers	Total Budget
<b>Sources</b>			
Section 8 Funds	4,994,739	583,843	5,578,582
<b>Other Income</b>	-	68,400	68,400
Total Sources	4,994,739	652,243	5,646,982
<b>Uses</b>			
Audit Fees	20,000	2,000	22,000
Office Expenses	150,000	15,000	165,000
Salaries	439,945	51,400	491,345
Tenant Services	63,000	-	95,500
Other Expense	18,650	-	18,650
<b>Total Administrative Expenses</b>	691,595	68,400	792,495
			-
HAPs Disbursed	4,256,044	669,600	4,925,644
Transfer Out to MTW Block Grant	42,100	-	14,600
Total Uses	4,989,739	738,000	5,732,739
Net Income/(Net Loss)	-	(85,757)	(85,757)

# ADMINISTRATIVE

## NOTICE OF PUBLIC HEARING AND COMMENT PERIOD

Public comments and documentation associated with the public comment period can be found in Appendix I: Public Comments and Responses.

### Public Notice

Keene Housing invites Keene Housing-assisted households and the community-at-large to review and provide comments regarding the Keene Housing DRAFT Moving to Work (MTW) Annual Plan for FY 2014. The DRAFT FY 2014 MTW Annual Plan includes changes to existing MTW activities as well as proposed new initiatives.

**Keene Housing will hold six (6) public hearings prior to finalizing its FY 2014 Moving to Work Annual Plan.** All meetings will occur at the Community Room/FAC of KH-owned or managed property's at 5:30 pm unless otherwise noted.

**Tuesday, September 3rd – Harmony Lane, 8 Harmony Lane, Keene**

**Wednesday, September 4th @ 2p – Central Square Terrace, 5 Central Square, Keene**

**Tuesday, September 10th – Harper Acres, 105 Castle Street, Keene**

**Tuesday, September 17th – North & Gilsum, North Street, Keene**

**Thursday, September 18th – Cutler Elementary, 31 South Winchester Street, Swanzey**

**Thursday, September 19th – Keene Housing Main Office, 831 Court Street, Keene**

In addition, Keene Housing welcomes written comments received at our Administrative Office before 4:30pm on September 28, 2013.

A copy of the **DRAFT** MTW Plan will be available for review at our Administrative Office located at 831 Court Street, Keene, starting August 28, 2013 to September 28, 2013 during normal business hours. Electronic versions can be e-mailed to interested members of the public upon request by contacting April Buzby, Special Assistant to the Executive Director, at (603) 352-6161 or [abuzby@keenehousing.org](mailto:abuzby@keenehousing.org).

## AGENCY DIRECTED EVALUATION OF DEMONSTRATION

Keene Housing has not engaged any outside evaluators to review the program as a whole. The agency does engage outside evaluators on an as-needed basis. In this FY2014 MTW Annual Plan, Keene Housing engaged the services of Edgemere Development, Inc. to evaluate the proposed changes to the Stepped Subsidy activity. KH will continue to evaluate the impact of our proposed and ongoing activities in 2014.

Keene Housing adopted new software in 2013 to aid us in extracting and analyzing data relative to our programs. We also engaged key staff in policy discussion and regular planning sessions to determine the best way to align our policies and procedures across all programs. MTW specific policy discussions help us monitor the efficacy of our activities and redirect those activities as appropriate.

## 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, 2014**, 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.

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

NH010

PHA Name 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 K ROBERTSON  
Name of Authorized Official

CHAIRMAN  
Title

[Signature]  
Signature

10-16-13  
Date

**Extract of the Minutes of the Regular Meeting of the  
Keene Housing Board of Commissioners  
October 16, 2013**

Members Present: Lee Robator, Chairperson  
Jack Noonan, Vice Chairperson  
Christopher Coates

Also Present: Joshua Meehan, Executive Director  
Carl Jacobs, City of Keene Liaison  
April Buzby, Special Assistant to the Executive Director  
Amy Wright, Human Resource Manager

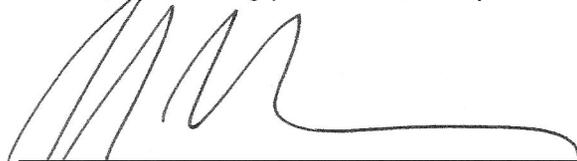
**Resolution 469: Fiscal Year 2014 Moving to Work Annual Plan**

RESOLVED, that the Keene Housing Board of Commissioners approves and adopts the Keene Housing Fiscal Year 2014 Annual Moving to Work Plan; and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated October 7, 2013 from April A. Buzby, Special Assistant to the Executive Director, to Joshua Meehan, Executive Director.

Motion to adopt: Mr. Noonan

Motion seconded by: Mr. Coates

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

  
\_\_\_\_\_  
Joshua Meehan, Executive Director

10/16/13  
Date

# APPENDIX I: PUBLIC COMMENTS AND RESPONSES

## MTW-RELATED COMMENTS

### Stepped Subsidy

*C: Two commenters asked what would happen to families who came in the Stepped Subsidy program at a higher subsidy level last year with the changes proposed for next year. The commenters were concerned that their rents would increase sooner than they anticipated.*

*R: To mitigate any unforeseen rent increases, families who entered the Stepped Subsidy program at Step 1 in 2013 will see their Step 1 subsidy extended for 1 year. All other families will remain on their current subsidy track. This means that a family who entered the program at Step 1 in 2012 or Step 2 in 2012 or 2013 will remain in Step 2 for 2014. Families scheduled to move to Step 3 in 2014 will see no change.*

*C: One commenter asked “What will be new Step 2 procedures on lease expiration?”*

*R: Procedures will remain the same for all Step 1 and Step 2 participants. The only change will be the schedule step changes, and related recertification. Under the current program recertification and step changes occur at Years 1, 2, and 4. The proposed change to the Stepped Subsidy program would change these to Years 1, 3, and 4.*

*C: Three commenters stated that the Step 3 subsidy was too low and asked if there are any changes in store for Step 3 participants. One commenter in particular points out that the higher tenant costs at Step 3 may jeopardize his wife’s ability to remain in school.*

Keene Housing is constantly evaluating its programs to make certain we are helping as many people possible and that our policies are having the intended effect. Based upon analysis of the program, including rent burdens and participant incomes, we are not planning on any changes to the Step 3 Subsidy. The Stepped Subsidy and Resident Self-Reliance programs work in tandem to make sure that work-able participants are working towards their educational and economic goals so that they are prepared to afford their rent from Step 1 through Step 3. The Safety Net program exists for participants who, for unforeseen reasons, are unable to afford their rent at any time during their journey through the Stepped Subsidy program.

### Resident Self-Reliance Program

*C: Several commenters expressed concerns that Keene Housing may focus on moving families out of the program before they are ready. Commenters pointed out that many families often struggle to find adequate employment due to their individual situation - part-time students, single parents , etc.- and/or because many regional employers have reduced employee work hours the past several years.*

R: Keene Housing recognizes that many families have limited options for increasing their income. While we would be happy to see more families gain enough economic security to no longer need our assistance, at this time we have no intention of changing our programs to force a family out before they are able to pay rent without assistance. RSR is about more than increasing income, however, it is also our goal to help families reduce their debts and become more financially literate which means that a family can more easily live within their current and anticipated income.

*C: Several commenters expressed dissatisfaction with the current RSR curriculum, stating that it was not appropriate to their specific situation or repetitive for those in the program for an extended period of time.*

R: Keene Housing recognizes that the current curriculum lacks flexibility and individualization. This is why we are proposing in this plan to change to an individualized goal setting program. We hope that by letting families set their own goals they will better benefit from the program and succeed in realizing their potential.

*C: How does the new curriculum and program effect current RSR participants?*

Current RSR participants will be required to develop an individualized goal plan in 2014 regardless of their step. Waived participants will remain waived unless they apply for Safety Net at which time their waived status will be revoked and they will need to set up a goal plan. Keene Housing is removing the option of waiving the programmatic requirements from the program effective January 1, 2014.

*C: How far along is Keene Housing in developing the new curriculum?*

R: Our RSCs are already deep in curriculum development and have already begun releasing some of the new training options to participants. At the November and December mandatory monthly meetings, the RSCs will provide a more comprehensive outline of what is in store for participants in the coming year.

### **Assets Threshold Changes**

*C: How is income calculated from assets and what assets are included? For example, do vehicles or real estate count towards the \$50,000 asset threshold?*

We calculate assets based on HUD's published passbook rate. HUD determines what assets are included but generally personal use vehicles are not included and real estate is included.

### **Medical Deduction Threshold Changes**

*C: One resident expressed concerns about the proposed increase to the medical deduction threshold.*

R: Keene Housing is aligning the deduction threshold with the IRS threshold. While we understand this is a significant increase in the threshold, most individuals will see little change to their rent portion. Those affected by this change, on average, will see an increase of \$1 to their rent portion. Households who see an unexpected increase in unreimbursed medical expenses during the year are encouraged to contact their tenant assistance specialist or property manager to request a referral to our Well Check program for assistance.

### Recertification Changes

*C: Several commenters asked for clarification on how recertification will happen under the proposed changes.*

R: Elderly and disabled households who do not have a pension or assets in excess of \$50,000 will no longer need to provide information for annual recertification or self-certifications. Instead, Keene Housing staff will confirm household income through the EIV system and recalculate rent based on changes as indicated by EIV or through the federal government's posted cost-of-living adjustment (COLA). Those households with pensions or assets in excess of \$50,000 will be required to self-certify income from these income sources annually.

Step 3 Stepped Subsidy participants will no longer be required to recertify, either through self-certification statements or triennial full recertification. Instead Keene Housing staff will periodically check EIV to determine if 30% of the household's gross income is equal to, or more than, the contract rent — known as the \$0 HAP Rent Burden Test (see p28). Step 3 participants will still be required to meet with their RSC quarterly and follow an individualized action plan. Quarterly meetings will include a review of household's income and expenses. Subsidy is terminated after 6 months of \$0 HAP.

### General Comments and Questions

*C: One commenter asked how Keene Housing is reinvesting in resident services and fairing in light of the recent sequester, funding cuts, etc.*

R: Due to our MTW status, Keene Housing is in the unique position of being able to streamline many of our processes. This streamlining frees up staff and residents from burdensome and time consuming bureaucracy. Fortunately, these efficiencies also bring administrative costs down that we can then reinvest into projects that improve the quality of life for our residents and increase the aesthetic and monetary value of our properties.

### NON-MTW COMMENTS

*C: Several commenters provided both positive and negative feedback about the condition of our properties, particularly the landscaping changes this past year. At Stone Arch Village and Riverbend, commenters expressed dissatisfaction with the landscapers excessive pruning of property trees and shrubs.*

R: Keene Housing has increased its commitment to the appearance of our properties. This year we hired a new vendor to handle landscaping and general grounds maintenance. While we are pleased overall with the appearance of the properties this year, we realize that there are several opportunities for further improvement. Next year we will be adding a mid-year landscaping clean-up in addition to our pre-season and end-of-season mulching/edge trimming projects.

While we appreciate the concerns of our residents about the potential over-pruning of trees and shrubs, this was done intentionally. Many of the trees were in bad shape and required extensive cutting to bring them back to health. Shrubs that were removed this year, particularly at Riverbend, were removed to make room for other property improvements such as replacing fences. Over the next few years, these trees will grow back healthier than ever.

*C: One resident asked how to notify KH of income change due to husband being in hospice care.*

R: When required residents should call their property manager or tenant assistance specialist and notify them of any changes in income. Our receptionist can point callers in the right direction when they are uncertain who to speak to.

*C: Commenters at all properties made positive comments about our maintenance staff and spoke about the great job they are doing. Several commented on the improvement in turn around times for work orders and the quality of work.*

R: We thank you for the response to our maintenance staff. Please continue to provide feedback on the work they do and promptly report any issues that need to be resolved.

*C: Several commenters at both North and Gilsum and Central Square Terrace expressed dissatisfaction with the condition of the units. At North and Gilsum residents are having difficulties with defective stoves, improperly installed flooring, and poor quality windows. CST residents are concerned with the condition of the flooring throughout the building but in the halls particularly.*

R: We are aware that several properties require interior improvements. We have engaged an outside firm to evaluate our capital needs and provide a Capital Needs Assessment (CNA). The CNA will help better inform our on-going property investments and provide us a road map to future improvements

*C: Commenters at several properties expressed dissatisfaction with last year's snow removal.*

R: Keene Housing has hired a new vendor to handle snow removal at our Keene properties. KH maintenance staff will handle snow removal at our Swanzey properties. Commenters were directed to ask their property manager about property-specific snow removal policies and encouraged to contact us anytime there is a problem with snow removal on a property.

# APPENDIX II: IMPACT ANALYSES

## STEPPED SUBSIDY PROGRAM

The following is an analysis of extending the Step 1 subsidy by one year for households in Year 1 of the Stepped Subsidy Program. These households would otherwise move to the Step 2 subsidy calculation in 2014.

**Total Households** 20

**Average Gross Income** \$14,365

### Households with an Increase in Total Tenant Payment

TTP Increase Amount (in Dollars)	%
Total Households with an Increase	30%
\$0.01 to \$25	10%
\$25.01 to \$50	5%
\$50.01 to \$100	10%
\$100.01 to \$250	5%
\$250.01 to \$500	0%
\$500.01 to \$1000	0%

### Households with a Decrease in Total Tenant Payment

TTP Decrease Amount (in Dollars)	%
Total Households with a Decrease	70%
\$0 (No Change)	0%
\$0.01 to \$25	0%
\$25.01 to \$50	15%
\$50.01 to \$100	5%
\$100.01 to \$250	25%
\$250.01 to \$500	25%
\$500.01 to \$1000	0%

### Change in Household Total Tenant Payment (in Dollars)

	Current	Proposed	Change
Average	\$417	\$244	-\$173
Median	\$447	\$246	-\$201
Maximum	\$447	\$445	-\$2

### Change in Household Rent Burden (TTP as percent of Gross Income)

	Current	Proposed
Average	45%	20%
Median	33%	20%
Maximum	94%	20%

### Change in Total Monthly Housing Assistance Payment Cost

	Current	Proposed	Change
<b>Total Monthly HAP</b>	\$15,550	\$19,005	+\$3,455

## ALTERNATIVE RECERTIFICATION

The following is an analysis of discontinuing recertification for elderly and/or disabled households beginning 2014.

**Total Households** 330  
**With Pensions** 38  
**With Asset Income** 2

### Participant Income from Pension and Assets

	Pension Income Amount	Asset Income Amount
Average	\$3,123	\$5,931
Median	\$1,962	\$5,931
Maximum	\$18,539	\$11,162

### Agency Cost and Staff Time Comparison

	Current	Proposed	Savings
Staff Time Spent per recert (hrs)	1.5	0.5	-1.0
Total Staff Time Spent (hrs)	495	165	-330
Admin Cost per recert	\$22.50	\$7.50	-\$15
Total Admin Cost	\$7,425	\$2,475	-\$4,950
Monthly HAP Cost	\$181,595	\$185,110	+\$3,515

## MEDICAL DEDUCTION THRESHOLD

The following is an analysis of the proposed medical deduction threshold increase on elderly and disabled households.

**Total Households** 338

**With Medical Expenses** 110

**Median Gross Income** \$17,484

### Households with an Increase in Total Tenant Payment

	#	%
Reduction of TTP \$1 to \$13	5	5%
\$1 to \$9	46	42%
\$10 to \$19	38	35%
\$20 to \$29	15	14%
\$30 or more	1	1%
Households with No Change in TTP	5	4%

### Change in Monthly Household Total Tenant Payment

	Current	Proposed	Change
Average	\$387	\$397	+\$10
Median	\$345	\$354	+\$9
Maximum	\$992	\$1,003	+\$11

### Median Income By Monthly Total Tenant Payment Increase

TTP Change	Median Income
Decrease in TTP \$1 to \$13	\$11,124
No increase	\$8,700
\$1 to \$9	\$13,459
\$10 to \$19	\$20,814
\$20 to \$29	\$31,202
\$30 or more	\$41,014

### Change in Total Monthly HAP Cost

	Current	Proposed	Change
Total Monthly HAP	\$55,285	\$54,166	-\$1,119

## ASSET EXCLUSION THRESHOLD

The following is an analysis of the proposed increase of the assets exclusion threshold to \$50,000 for all MTW participants.

**Total Households** 330

**Households with Assets under \$50K** 310

**Households with Assets <\$100K** 8

### Change in Monthly Housing Assistance Payment costs

	Current	Proposed	Change
Monthly HAP Cost	\$181,595	\$181,785	+\$190

### Change in Total Tenant Payment

	Current	Proposed	Change
Average	\$368	\$367	+\$1
Median	\$300	\$300	\$0
Maximum	\$1,291	\$1,291	\$0

### Households with Decrease in Total Tenant Payment

	#	%
\$1 to \$9	74	22%
\$10 to \$19	3	1%
\$20 or more	1	1%
No Change in TTP	252	76%

# APPENDIX III: MOVING TO WORK ACTIVITIES

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics
Eligibility Administration	Increase housing options	Provide increased housing choices for applicants	100% of applicants lease-up after issuance in 2009. 100 private landlords and 7 waiting lists for the Section 8 program	95% of applicants lease up after issuance on an annual basis	Percentage of applicants issued Coupons who lease up in Section 8 program
HQS Inspections	Increase cost effectiveness/efficiency	Reduce number of required HQS inspections. Reduce number of duplicative inspections.	100% HQS inspections conducted by KH 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.	75% reduction in HQS inspections conducted by KH 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	Percentage of HQS inspections conducted by the landlord vs. KH staff. Number of units failing HQS; Number of inspections conducted by KH staff and contracted services.
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

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Stepped Subsidies (formerly Housing Assistance Coupon)	Incentive for self-sufficiency; Increase cost effectiveness/efficiency	Provide incentives for families to move to work; Reduce administrative burden for KH and reporting requirements for participant; Provide educational incentives for families.	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.
Resident Self-Reliance Program	Give incentives to families with children to obtain employment and self-sufficiency	Increase number of families working; Increase share of residents making progress toward self-sufficiency	47% of households employed full-time in 10/1999; 51% of households increased their earned income in 2008; 39% households exiting the program achieved self-sufficiency in 2005	15 % increase in number of households employed; 75% of households increase their earned income. 75% of households leaving the program due to achievement of self-sufficiency competencies	Number of households employed; Earned income of households; Reasons participants leave the program
Shelter Housing Assistance Coupon Program	Increase housing options/Increase cost effectiveness	Increase housing options for homeless; effective use of HAP to serve more families	Predates 2008; not required.	SRO Average HAP/yr, \$6,420; SHAC Average HAP/yr, \$1,056	Number of families served. SHAC Average HAP. SRO Average HAP.
Alternative Recertification Schedule	Increase cost effectiveness/efficiency	Reduce administrative burden	Estimated baseline of 359 certifications conducted annually in 1999; Staff time spent on annual re-certifications; Reduction in coupon administrative costs per HAP (baseline in 2010)	30% reduction in number of required full re-certifications; 50% reduction in staff time spent on annual re-certifications; 25% reduction in administrative costs per HAP	Number of full re-certifications conducted annually; Staff time; Changes in administrative costs per HAP on a monthly basis

MTW Activity	Statutory Objective	Impact on Statutory Objective	Baseline	Benchmarks	Metrics
Standard Deductions	Increase cost effectiveness/efficiency	Reduce administrative burden and reporting requirements for residents	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	75% of households receive standard deduction within a fiscal year. Number of staff time verifying expenses saved per year per household	Percentage of households receiving the standard deduction. Staff time saved.
Homeownership Programs	Increase housing options	Increase number of households moving to homeownership	1 household achieved homeownership in 1999	10 households active in KH's homeownership program by 4/2008	Number of households in KH's Section 8 homeownership program
Project-Based Coupons	Increase housing options	Increase availability, quantity and quality of assisted housing	Zero units of PBVs on 1/1/2009. Supplemental Measures: income distribution of Section 8 tenants; Average time spent on waiting list. Number of coupons issued vs. utilized (baselines will be established when issuance resumes)	213 units of PBVs 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 PBV inventory; Supplemental Measures: Income distribution of Section 8 tenants; Average time spent on waiting list;  Number of coupons issued vs. utilized
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.