

2016

Moving to Work

Annual Plan



Keene Housing

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RECORD OF SUBMISSION

Original Submission Date: October 16, 2015

Resubmission - Response to HUD Comments: January 12, 2016

HUD Approval Date: TBD

I. INTRODUCTION

Keene Housing (KH) is a recognized leader in innovative, successful housing policy and program development. Established in 1965, KH's record of high performance enabled the agency to become one of the first agencies accepted into the Department of Housing and Urban Development's (HUD) Moving to Work (MTW) deregulation demonstration program in 1999. Fifteen years later, KH continues performing to the highest standards while creating innovative policies and programs that support the well-being and success of the low-income households we serve.

The importance of the regulatory and funding flexibilities provided by MTW in the continuing success of KH and those we serve cannot be overstated. MTW rejects HUD's traditional one-size-fits-all approach to helping low-income families, and acknowledges the unique strengths and challenges of the households and communities each MTW agency serves. MTW provides participating agencies the ability to waive many of the costly, burdensome and sometimes counterproductive regulations that stifle a traditional public housing authority's (PHA's) ability to implement common sense cost-savings measures and policy reforms and prevents PHAs from quickly responding to changing local economics. The effect of the current regulatory framework and accompanying rules is that too often residents, voucher holders, and families waiting for affordable housing suffer, while opportunities to genuinely address housing shortages and opportunity gaps are lost in a sea of red ink.

The ability to test innovative ways to develop and maintain high quality affordable housing and explore new methods for providing the supports low-income households need to improve their and their children's lives is a core strength of the program. Just like any new idea or innovation, not all activities designed in MTW work as expected. However, MTW flexibility allows agencies to quickly react by adjusting or discontinuing MTW activities based on results, rather than the whims or passions of policy makers in DC. This flexibility to make local choices, based on local circumstances is not available to non-MTW PHAs who, despite their expertise and passion for our shared mission, must continue their slow march towards obsolescence as the rules promulgated by HUD increase each year while the funds PHAs receive steadily decline.

While MTW focuses on designing programs that center on local realities, successful activities developed by MTW agencies can also provide insight into cost savings measures and self-sufficiency supports that work for all PHAs. Recent changes to the law regarding the frequency of housing quality standards (HQS) inspections and the calculation of utility allowances in the Housing Choice Voucher (HCV) Program, as well as proposed future changes to recertifications for households on fixed incomes, are the result of common sense improvements developed, vetted, and perfected by MTW agencies.

While KH uses our MTW flexibility to address the unique needs and opportunities in New Hampshire's Monadnock region, we make sure that all of our MTW activities accomplish at least one of the three statutory objectives established by Congress when it created Moving to Work 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.

Guiding Principals

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

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

Independence — Provide residents the supports they need to best manage their lives and attain the life goals they set for themselves – being sensitive to the fact that, for each of us, “success” is relative. Success for one households may be the purchase of a home while for another it may simply mean having a safe, affordable home in which to comfortably grow old.

MTW AT KEENE HOUSING

The last two years saw a significant amount of change at KH. In 2014, we evaluated and, where necessary, restructured nearly every MTW activity to improve performance and more easily measure outcomes. Continuing evaluation of the restructuring and feedback from participants in 2015, indicate that the changes we implemented were successful in providing work-able adults important relief and supports to help them reach greater economic independence. For example, changes to the Stepped Subsidy activity saw a drop in the number of households entering Step 2 with high rent burdens. The household-centered focus of the Resident Self-Reliance program and addition of Development Grants and Rent Credit (DGRC) fund provided many households the needed supports to increase their earnings by obtaining reliable childcare, pursuing educational goals, or acquiring a professional license. As of July 2015, 19 households that received DGRC funds in 2014 increased their income, by an average of nearly \$8,000.

In 2015 KH was provided the opportunity to work with Monadnock Menus and the Cheshire County Conservation District to bring fresh, local produce to KH families. The Farm to Family Buying Club is a pilot program that allows KH-assisted households to order produce directly from local farmers each week, often at prices at or below those found at local grocery stores. In addition, Farm to Family members that receive SNAP benefits are eligible to use their benefits and receive up to \$10 in Granite State Market Match credit towards their order each week. In the first month thirty-seven (37) households registered in Farm to Family, providing fresh produce to 32 children, 22 work-able adults, and 27 elderly/disabled residents.

For our youth, KH spent 2014 and 2015 developing and strengthening partnerships with local organizations to provide access to programs generally unavailable to children living in low-income households. The addition of the sports, arts, and leadership development activities our partners provided to our existing youth program, Building Bridges, created a more robust program. By the end of 2015 households with children who participated in our youth programs showed increases in kindergarten readiness, improvements in youth self-image, and better parent engagement. The continuing growth and success of our youth services programs allowed KH, with the help of MTW funds, to take the next step and create a new non-profit to serve KH kids, the Keene Housing Kids Collaborative (KHKC). Our existing youth services transitioned to KHKC in mid-2015.

Finally, 2015 saw the first preservation of an expiring Project Based Section Eight property using the Affordable Housing Preservation Program (AHPP) and significant improvements to our portfolio through the Affordable Housing Preservation and Modernization (AHPM) activity. Of note, KH's ability to use MTW funds for preservation activities was critical to our successful Community Development Block Grant (CDBG) application for Meadow Road (2014) and the Men's Shelter (2015). KH's ability to utilize MTW savings to help address our capital needs plays a large part in our outstanding property management performance. KH's vacancy rate typically hovers around .7%; vacated units are made ready for re-occupancy in ten days and reoccupied within twenty.

SHORT TERM GOALS

In the short term, KH plans to build on our successes and take advantage of opportunities that support KH's mission and improve the lives of those we serve. For our adult participants, KH continues to monitor each of its MTW activities for unintended impacts and potential problems. The Resident Service Coordinators (RSC) who oversee the RSR program look for new ways to remove the barriers holding back our work-able adults from becoming economically independent,

healthy wage earners. KH is exploring options for expanding programs, like Farm to Family, which bring healthy, low-cost food options to our participants. For our elderly and disabled participants, KH is looking for ways to provide opportunities and partnerships that encourage engaged, healthy, and active living in our elderly/disabled properties.

With KH's support, KHKC is positioned to expand youth services programming to provide not just educational, sports, and creative activities for our school-aged youth but also internships, homework support, and eventually, funding permitting, Individual Development Accounts (IDA) to older youth, ultimately providing them the skills and resources needed to pursue secondary education or enter the workforce.

For our housing stock, KH anticipates that addressing the capital needs will take several years. The Capital Needs Assessment (CNA) done in 2014 showed a significant number of immediate and long-term issues that need to be addressed. Over the next few years, KH is expecting to spend significant funds improving the properties to ensure their long-term viability. In conjunction with these needs, KH is addressing our carbon footprint by connecting energy efficiencies with capital improvements. For more information on what KH is doing to increase our energy efficiencies see our Energy Improvement Plan in Appendix I.

LONG-TERM MTW PLAN

As this Annual Plan is being drafted MTW agencies and HUD are in the second year of negotiations over the 10-year extension of our MTW Agreement (from 2018-2028). Significant hurdles have been overcome to ensure a MTW agreement that both sides can agree upon, however, there is still much to be done. While KH completed an agency-wide Five Year Strategic Plan in 2015 (Appendix II), with the uncertainty of what the future MTW agreement will look like, it is impossible to articulate KH's long-term MTW goals other than to secure an extension of our MTW Agreement that does not diminish or weaken our ability to help make sure that the Monadnock region's most vulnerable citizens have a chance to live the best lives they can. If an extension is secured, we will accomplish this not only by providing an ever-broadening menu of housing opportunities, but by directly offering or connecting our neighbors to the services and programs they need to help them meet the goals they set out for themselves.

HOUSING STOCK INFORMATION

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

MTW flexibilities have allowed us to re-imagine how a PHA can develop and manage its housing portfolio. In 2007 KH got out of the public housing business by converting its entire public housing portfolio to conventional financing with MTW Project-Based Vouchers (PBVs). This protected these crucial units from the slow decay caused by years of federal disinvestment in public housing. In addition, many of our LIHTC properties include MTW PBV subsidies providing higher income than we would receive absent the public housing operating subsidy, thereby allowing us to better maintain the properties. Our homeless shelters utilize shallow subsidies provided through our Transitional Housing Assistance Subsidy Program (THASP) and the Affordable Housing Preservation Program (AHPP) allows us to preserve the affordability of eighteen expired Project-Based Section 8 units at Meadow Road. For a clearer picture of which units benefit from our participation in MTW, please see the table provided on page 14.

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

KH does not intend to add any public housing units to our portfolio in 2016.

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

* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other

If Other, please describe: N/A

If Other, please describe: N/A

Planned Public Housing Units to be Removed During the Fiscal Year

KH does not own any public housing units.

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

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

Table 1. New PBVs anticipated in FY2016.

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

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

Other Changes to the Housing Stock Anticipated During the Fiscal Year

KH does not anticipate any other changes to our housing stock in FY2016.

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

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

LEASING INFORMATION

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

Table 2. Anticipated number of households served in FY2016.

MTW Households to be Served Through	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	0	0
Federal MTW Voucher (HCV) Units to be Utilized	587	7044
Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	62	744
Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	651	7812

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

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

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

Reporting Compliance with Statutory MTW Requirements

Keene Housing is in compliance with all statutory MTW requirements.

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

KH does not anticipate any issues relating to leasing in any of its MTW programs for FY2016.

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

WAIT LIST INFORMATION

Table 3. Projected Number of Wait List Applicants for FY2016 by Wait List Type.

Housing Programs(s)*	Wait List Type**	Number of Households on Wait List	Waitlist Open, Partially Open, or Closed***	Are There Plans to Open the wait List During the Fiscal Year?
Federal MTW HCV Units (Tenant Based)	Community-Wide	337	Open	N/A
Federal MTW HCV Units (Tenant Based)	Program Specific (PBV Mobility)	57	Partially Opened	No
Federal MTW HCV Units (Tenant Based)	Program Specific (NED)	185	Open	N/A
Federal Non-MTW HCV Units	Program Specific (Mainstream)	185	Open	N/A
Federal MTW HCV Units (Project Based)	Site-based (Unduplicated)	627	Open	N/A

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

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

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

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

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

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

Keene Housing Owned and Managed Portfolio

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

2016.01.CE Project-Based Unit Agency Conducted Inspections

Currently, KH's Director of Facilities and Assets certifies all KH owned and managed Project Based Voucher (PBV) units to Uniform Physical Condition (UPC) Standards at turnover. In addition, a KH inspector certifies that these units meet Housing Quality Standards (HQS) as specified in KH's MTW HQS activities: 2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule and 2013.01.CE Housing Quality Standards (HQS) Alternative Inspection Protocol. In addition, supervisory personnel who have not been involved in routine inspections monitor the quality of KH's inspections, by re-inspecting five (5%) percent of all initial and annual inspections performed each quarter as a Quality Control (QC) mechanism.

Section 8(o)(11) of the 1937 Housing Act and 24 CFR 983.103(f)(1) requires PHAs to contract with a third party inspector for PHA owned PBV units. In response, we began searching for a third party inspector for the owned and managed PBV units. A Request for Proposals (RFP) was released in 2014 and again in September of 2015. KH received no proposals.

Due to KH's inability to locate a third party inspector, KH proposes to waive the third party inspection requirement until such time that an independent inspector can be found. KH would continue to perform all inspections as described above. The proposed activity achieves the cost-effectiveness objective by allowing KH to continue inspecting its units without the additional expense of hiring an independent inspector. The activity only affects KH's former public housing portfolio as all other KH owned PBV units are inspected at a higher standard by an outside regulatory agency. There is no anticipated impact on KH or residents due to this activity as it makes no change to current practice.

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

Activity Metrics Information

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$10,279	\$10,279		

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	481	481		

CE #3: Decrease in Error Rate of Task Execution

Unit of Measure	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	<1%	<1%		

Need/Justification for MTW Flexibility

The Project-Based Unit Agency Conducted Inspections activity utilizes Attachment C D.7.d, Ability to Certify Housing Quality Standards of the 2008 Amended and Restated Moving to Work Agreement to waive provisions of Section 8(o)(13) of the 1937 Housing Act and 24 C.F.R. 982, Subpart I. Specifically the proposed activity waives the requirement that PHAs contract with a third party inspector to certify HQS compliance for all owned PHA PBV units. This flexibility is necessary as KH is unable to locate a firm interested in contracting as KH's third party HQS inspector.

ACTIVITY NUMBERING SYSTEM

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

IMPLEMENTED ACTIVITIES

1999.01.HC Eligibility Administration Guidelines

Plan Year Approved: 2000

Year Implemented: 2000

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

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.02.CE Housing Quality Standards (HQS) Landlord Self-certification Inspection Protocol

Plan Year Approved: 2000

Year Implemented: 2000

Property owners are permitted to self-certify HQS compliance of units that pass an initial KH HQS inspection in lieu of a KH administered biennial inspection. This self-certification is completed by the owner certifying a unit has been maintained

to HQS standards or by providing evidence that a unit has passed a third party inspection with criteria that are equal or at a higher standard than HQS, such as REAC or UPC.

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

Landlord self-certified units are held to the same schedule or standards as other units, per our MTW activities 2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule (page 28) and 2013.01.CE Housing Quality Standards (HQS) Alternative Inspection Protocol (page 29).

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.03.CE Rent Reasonableness Neighborhood Analysis Discontinuance

Plan Year Approved: 2000

Year Implemented: 2000

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

Dictating to participants what is a reasonable rent is also contrary to KH's philosophy of empowering participants to make decisions based on their needs, rather than arbitrary requirements set by KH. It is KH's belief that the household, not KH, is the best judge of what an appropriate rent is (see 40% Affordability Discontinuance activity on page 19). To ensure HCV holders are not being unfairly charged higher rents, KH compares our participants' rents against the Market Analysis released regularly by the New Hampshire Housing Finance Authority.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.07.HC Reasonable Rent Determination Discontinuance

Plan Year Approved: 2000

Year Implemented: 2000

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

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.08.HC 40% Affordability Discontinuance

Plan Year Approved: 2000

Year Implemented: 2000

KH does not require participants to maintain a rent burden of less than 40% when leasing a unit or negotiating rents with an owner. Instead, we allow the participant to be the judge of his or her priorities in relation to housing choice and rent burden. Participants are counseled during the issuance briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing a unit that creates a high rent burden. Once a unit is chosen, KH calculates the proposed rent burden and if it exceeds 40%, KH allows the participant an opportunity to demonstrate

how they will afford their rent without sacrificing necessities. Households whom KH permits to lease-up with a rent burden exceeding 40% are not eligible for Safety Net unless an unanticipated change in circumstances, such as income loss or change in household composition, causes a rent burden in excess of their rent burden at lease-up.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

2005.03.HC MTW Homeownership Flat Subsidy

Plan Year Approved: 2005

Year Implemented: 2005

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

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

While KH believes that supporting a household's homeownership goals and maintaining homeownership is important, we also believe that continuing to assist households after they no longer need assistance is contrary to our mission and an inefficient use of ever declining tax payer funds. To balance these two goals, KH initiated a flat subsidy for households in the program with incomes between 80% AMI and 140% AMI, in addition to HUD's standard term limits. By adopting both a flat subsidy and term limits, KH promotes participants' efforts to increase financial stability while holding them to a higher standard than HUD's traditional homeownership program.

With the economic and housing market instability in 2008, Keene Housing initiated a policy change that permitted homeownership families to request an interim

recertification if their incomes changed. This policy change prevented at least two foreclosures and remains in place.

No new Homeowner Vouchers were issued in 2015, although 4 households purchased a home without our assistance. Participation is currently at 6 households.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.06.HC Transitional Housing Assistance Subsidy Program (THASP)

Plan Year Approved: 2000

Year Implemented: 2000

THASP helps homeless and hard-to-house individuals and families access stable housing through partnerships with local service providers. THASP partners receive shallow subsidies to offset the costs of maintaining shelters for the region's homeless. In exchange, the partners agree to that THASP participants do not pay more than 30% of their income for shelter and receive case management and counseling to help gain long-term housing.

THASP has become a critical component of Keene's homeless and domestic violence shelter system. KH provides shallow subsidies for 5 transitional housing programs – a Men's Homeless Shelter, a Family Homeless Shelter, Second Chance for Success, Fairweather Lodge, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault. Three of the shelters – the men's shelter, family shelter, and Second Chance – are managed by Southwestern Community Services (SCS), the local Tri-Cap agency.

As of this writing, our partner at Fairweather is pulling out of the property. We anticipate executing a THASP agreement with a new partner using the space, which is owned by a non-profit organization dedicated to making sure Fairweather is used for helping the region's most vulnerable citizens.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

1999.04.CE Stepped Subsidy Rent Reform

Plan Year Approved: 2000

Year Implemented: 2000

In KH's experience, non-elderly, non-disabled households coming off the wait list are often in need of more support and financial assistance than those who have been receiving assistance for a longer period of time. The Stepped Subsidy Rent Reform responds to this need by providing a deep Housing Assistance Payment (HAP), with households only paying 20% of gross income towards rent for the first two years of housing assistance (see table, below, for 2015 Stepped Subsidy amounts). During this time participants are also enrolled in the Resident Self-Reliance (RSR) program (page 24) where they receive supportive services from KH's resident service coordinators (RSCs). Households work with RSCs throughout their time with us to identify barriers to self-sufficiency and develop a plan to move towards financial security and, eventually, out of housing assistance.

2016 Voucher Payment Standard by Bedroom Size and Step Subsidy Level

# 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

We have found that calculating HAP based upon a household's earnings punishes them for increasing their income by responding to the increased income with an in-kind increase in the tenant payment. This is a serious disincentive for a household to increase their income and has been found to result in employment instability¹. It has also been found to negatively impact a household's ability to save or plan for the future², both which are contrary to KH's mission.

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

¹ Heather Boushey. 2002. *Staying Employed After Welfare*. Economic Policy Institute. Washington, DC

² Corse, Sarah. and Silva, Jennifer. 2013. "Intimate Inequalities: Love and Work in a Post-Industrial Landscape" Paper presented at the annual meeting of the American Sociological Association Annual Meeting, New York City.

Stepped Subsidy is mandatory for all non-elderly, non-disabled households, although both elderly and disabled households may opt-in to the program. Typically between 110 and 130 households have their subsidy calculated under the Stepped Subsidy Rent Reform.

Stepped Subsidy households are subject to the Reasonable Rent Determination Discontinuance activity (page 19). HAP is paid directly to the household and it is the household's responsibility to pay the full rent to the owner and KH has no HAP contract with the owner. In addition, all Stepped Subsidy participants are required to participate in the RSR program as long as they receive housing assistance.

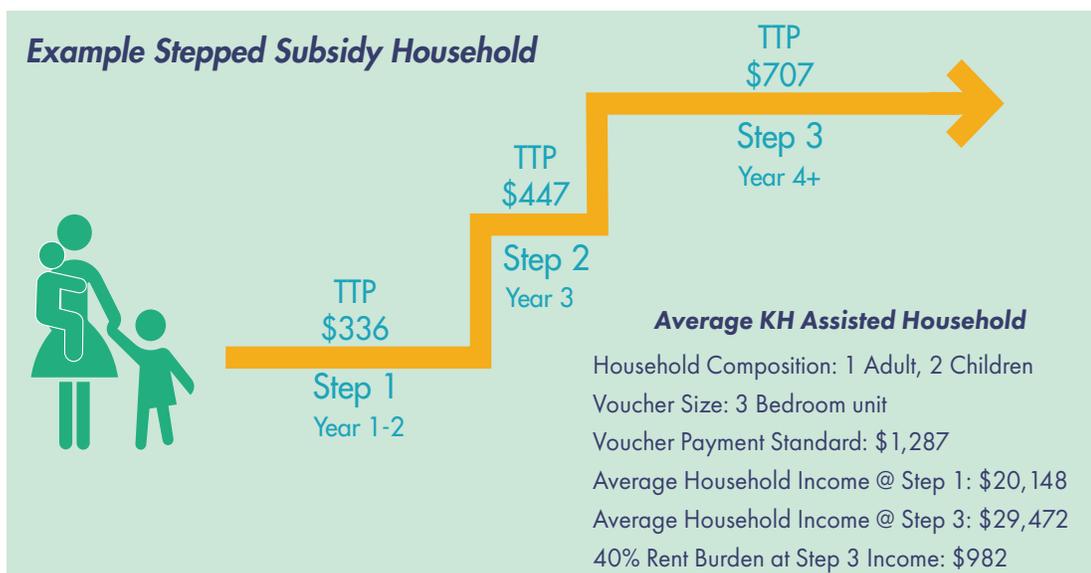
In 2015, 11 (10%) Stepped Subsidy households moved out of housing assistance and became self-sufficient. Since 2010, the number of self-sufficient households moving out of housing assistance has remained steady at 10% to 15% of participating households annually, compared to less than 5% of similar households we serve in other programs who cannot participate in Stepped Subsidy or RSR programs. KH monitors rent burden quarterly to ensure participation in Stepped Subsidy does not cause excessive burdens to participating households. Ongoing evaluation shows that most households with high rent burdens only remain burdened for a short period of time or have chosen to lease-up at a high rent burden (see 40% Affordability Discontinuance activity page 19) for reasons that they feel are important enough to lease-up a unit that is more expensive than we'd usually expect.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.



1999.05.SS Resident Self-Reliance (RSR) Program

Plan Year Approved: 2000

Year Implemented: 2000

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

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

Individualized Goal Setting

New participants meet with their RSC to complete an initial proficiencies assessment. The assessment helps the household and RSC develop an individualized 3-year Goal Action Plan. The plan includes actionable goals and milestones tailored to the assessment findings with concrete dates for completion. Participants are encouraged to anticipate scheduled increases in rent, as described in the Stepped Subsidy activity (page 22), or other potential changes in financial needs, such as changing child care needs, when developing their Goal Action Plan. Upon completion of a 3-year Goal Action Plan, the participant and RSC establish a new 3-year plan.

Development Grants and Rent Credits

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

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

Rent Credits are designed to provide a financial reward to households that meet an established milestone or goal from their 3-Year Goal Action Plan. Upon completing a goal, the household receives a small credit towards the following month's rent.

Rent credit amounts are established by RSCs based upon the difficulty of the goal and the amount of funding available. Households may receive a Rent Credit for meeting any goal, even if they utilized a Development Grant to achieve it.

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

Participant Compliance

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

RSR Waivers

Prior to 2014, participants that completed the RSR program requirements or had completed 5-years in the RSR program received an RSR waiver. Those households remained in the Stepped Subsidy program but were no longer required to attend meetings with their RSC or participate in RSR workshops. When the RSR program was restructured in 2014 we discontinued this practice. RSR Participants that received a waiver prior to the restructuring are permitted to keep their waiver unless they apply for hardship through Safety Net or are found non-compliant with their lease or Obligations of the Family.

Changes Proposed for FY2016

A recent analysis shows that households waived from the RSR program remain in the voucher program longer, on average, than households who continue to participate in RSR, 8.7 years versus 3.5 years, respectively. KH proposes requiring waived households to return to the RSR program if the household's Step 3 Total Tenant Payment (TTP) is less than 30% of the household's gross income.

Currently, 16 waived households meet the proposed criteria. Many of these households have remained at the same income level for several years and are close to reaching self-sufficiency. We believe access to the DGRC fund, coupled with supports from our RSCs, may provide these families with the necessary tools to take the last step to self-sufficiency.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

2005.01.CE Elderly and Disabled Household Alternative Recertification Schedule

Plan Year Approved: 2005

Year Implemented: 2005

KH uses a streamlined recertification process for elderly and disabled households with fixed income sources – Social Security (SS), Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), or assistance from the Aid to the Terminally and Permanently Disabled (ATPD) program – and net assets below \$50,000. Instead of the traditional recertification, KH relies on the published Cost of Living Adjustment (COLA) and Enterprise Income Verification (EIV) system to calculate each household's income. Households receive a notification via mail of their new tenant share and subsidy without attending a recertification appointment. Included with this notice is the standard Authorization for Release of Information/ Privacy Act Notice (HUD form 9886). All elderly and disabled households may also request a interim at any time per the policies laid out in our MTW Administrative Plan.

Changes Proposed for FY2016

KH proposes expanding the COLA recertifications to all households receiving 100% of their income from any fixed income source that do not have net assets exceeding \$50,000. This change adds the following categories to our definition of fixed income:

- Disability Compensation and/or Dependency and Indemnity Compensation (DIC) payments, received from the Veteran's Administration (VA);
- Federal, State, local, and private pension plans that provide substantially the same amount year to year; and
- Other regular payments received from annuities, disability or death benefits, insurance policies, retirement funds, and other similar types of income that provide substantially the same amount year to year.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2005.02.CE Stepped Subsidy Recertification Schedule

Plan Year Approved: 2005

Year Implemented: 2005

Instead of the traditional annual recertification process, participants whose subsidy is calculated under the Stepped Subsidy Rent Reform are recertified at each Step

change, typically Years 3 and 4.

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

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2008.01.HC Project-based Voucher Program

Plan Year Approved: 2008

Year Implemented: 2008

KH project-bases at least 60% of its available voucher funding plus any funding received for units project based through the AHPP activity. In addition, KH waives the required public process for project-basing units within KH owned and managed properties and those project-based through the AHPP activity (page 29). KH also uses its MTW flexibility to project base up to 100% of the units within a property.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2008.02.CE Restrictions on Section 8 Portability

Plan Year Approved: 2008

Year Implemented: 2008

KH restricts the ability of participants in the RSR program to port out of the Monadnock Region unless they can provide a demonstrable need for a reasonable accommodation, are the victim of domestic violence, or can show that, consistent

with the RSR program's intent, such a move would demonstrably increase their financial stability, such as new employment or enrollment in an educational program. There are no portability restrictions for elderly/disabled households.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule

Plan Year Approved: 2011

Year Implemented: 2011

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2013.01.SS \$0 HAP Rent Burden Test

Plan Year Approved: 2013

Year Implemented: 2013

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

The \$0 HAP Rent Burden Test provides a way to meet that delicate balance. When a Stepped Subsidy household reaches economic independence, measured as having a gross rent at or below 30% of gross income, KH reduces the HAP to \$0

for 6 months. If the household does not experience an unanticipated change in income within the \$0 HAP period, housing assistance is terminated. This provides households a period to adjust to life without housing assistance, while also ensuring we are being responsible stewards of the tax payer's investment.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

2013.02.CE Housing Quality Standards (HQS) Alternative Inspection Protocol

Plan Year Approved: 2013

Year Implemented: 2013

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2014.01.HC Affordable Housing Preservation Program (AHPP)

Plan Year Approved: 2014

Year Implemented: 2015

AHPP provides property owners the ability to opt-out of an expiring PBRA contract and execute to a AHPP PBV HAP contract with KH. As vouchers sometimes provide higher payments than older PBRA contracts, entering into a AHPP PBV HAP contract can provide owners access to additional rental revenue and new potential funding opportunities for capital improvements. In addition, the AHP program is much easier and less expensive for owners to comply with HUD's multifamily program. This results in reduced overhead for owners, which when combined with competitive PBV rents, makes the AHP program very attractive to owners of expiring use properties as well as investors interested in purchasing and preserving them. At opt-out, KH provides residents the option of remaining in place and converting their Enhanced Voucher to a PBV, staying in-place with their Enhanced Voucher or taking their voucher to the private market.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2014.02.CE Medical Deduction Threshold

Plan Year Approved: 2014 Year Implemented: 2014

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2014.03.SS Asset Exclusion Threshold

Plan Year Approved: 2014

Year Implemented: 2014

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2014.04.SS Keene Housing Kids Collaborative (KHKC)

Plan Year Approved: 2014 (Amended)

Year Implemented: 2015

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

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

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

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2014.05.HC Affordable Housing Preservation & Modernization Program

Program Year Approved: 2014 (amended)

Year Implemented: 2014

The Affordable Housing Preservation and Modernization Program allows KH to use savings realized from rent, programmatic, and administrative reforms to address KH – and KH-affiliate owned properties’ growing capital needs. These funds allow KH to respond to the portfolio’s needs in a rational way, with a predictable schedule, based on greatest need and economies of scale, rather than in reaction to unpredictable and uncertain grant opportunities. With planned capital expenditures for 2016 of more than \$1 million, MTW is playing a critical role in preserving the lion’s share of Keene’s affordable units.

Changes Proposed for FY2016

KH proposes no changes to this activity.

Metrics Changes for FY2016

KH will outline any changes to metrics or baselines for this activity in the FY2016 Report.

2015.01.CE Affordable Housing Preservation Program (AHPP) – Rent Reform

Plan Year Approved: 2015

Year Implemented: 2015

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

- Triennial recertifications for all households.
- Interim recertifications limited to household composition changes and cases where the total household income permanently drops by \$50 per month or more, with access to Safety Net for short term financial hardship.
- The Utility Allowance in effect at the effective date of the last regular recertification used to calculate rents at interim recertifications.
- Household assets with a total net value of \$50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated.

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

Changes Proposed for FY2016

KH proposes to adopt a Cost-of-Living Adjustment (COLA) recertification process for elderly and disabled AHPP households who receive 100% of their income from fixed sources. Similar to the streamlined recertification process outlined in Elderly and Disabled Household Alternative Recertification Schedule (page 26), Keene Housing will not require elderly and disabled households with fixed income sources and net assets at or below \$50,000 to participate in the triennial recertification process.

Instead KH will rely on the published Cost of Living Adjustment (COLA) and the Enterprise Income Verification (EIV) system to calculate household income. Households are notified via mail of their new tenant share and subsidy amount. Households with pensions and assets above \$50,000 will continue to participate in the regular, full triennial recertification process.

This change applies to five (5) households currently living at Meadow Road. As this merely streamlines the recertification process and does not change how we calculate tenant payment, there is no anticipated impact to eligible participants.

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

Hardship Case Criteria

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

If a household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program which provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. KH has operated Safety Net for 15 years as part of the Stepped Subsidy activity.

2015.02.CE Affordable Housing Preservation Program (AHPP) – Alternative Inspection Schedule

Plan Year Approved: 2015

Year Implemented: 2015

Properties participating in AHPP (page 29) use the following alternative schedule for Housing Quality Standards (HQS) inspections:

- All units converting to AHPP are inspected by the administering agency for HQS compliance no more than 30 days before initial conversion.
- If all units pass initial inspection, the property is subject to biennial HQS inspections of 20% of total units.
- Should any unit fail initial or any other inspection, the property is subject to an annual inspection of 100% of units until all pass HQS inspection, at which time the property returns to a 20% biennial inspection schedule.
- Properties subject to a higher inspection protocol than HQS may use that protocol in lieu of a biennial (not initial) HQS inspection.
- Properties that fail an inspection based upon a higher standard protocol are subject to an annual HQS inspection of all (100%) units until all units pass HQS or a higher inspection protocol.

A household may, at any time, request a HQS inspection from the administering agency should the tenant believe that their unit does not meet HQS.

Changes Proposed for FY2016

KH proposes to increase the number of days between initial inspection and conversion to AHPP PBV from 30 to 90 days. This change will provide time for HQS inspectors to complete inspections and owners to make any necessary repairs before conversion.

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

2015.03.CE Earned Income Disregard (EID) Discontinuance

Plan Year Approved: 2015

Year Implemented: 2015

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

Activity Metrics Information

Any changes to metrics or baselines for this activity will be outlined in the FY2016 Report.

Hardship Case Criteria

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

NOT YET IMPLEMENTED ACTIVITIES

All KH MTW activities have been implemented.

ACTIVITIES ON HOLD

No KH activities are on hold at this time.

CLOSED OUT ACTIVITIES

2006.01.CE Standard Deductions

Plan Year Approved: 2006

Year Closed: 2013

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

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

In 2013, Keene Housing discontinued application of the standard deduction for households with no unreimbursed medical expenses or expenses below the medical deduction threshold as it actually increased agency costs overall.

V. SOURCES AND USES OF FUNDING

This section describes the agency's projected revenue and expenditures for MTW funds for 2016 and reflects use of MTW Block Grant Single-fund Flexibility.

ESTIMATED SOURCES OF MTW FUNDING FOR THE FISCAL YEAR

The following table summarizes estimated MTW sources of funds for 2016 by Financial Data Schedule (FDS) line item, as required by new HUD guidance on MTW Plans and Reports. Since HUD's FY2016 funding levels have yet to be established, the following estimates assumes no additional proration in HUD funding.

Table5. FY2016 Estimated Sources of Funding by FDS Line Item

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300 + 70400)	Total Tenant Revenue	\$0.00
70600	HUD PHA Operating Grants	\$5,381,293.00
70610	Capital Grants	\$0.00
70700 (70710 + 70720 + 70730 + 70740 + 70750)	Total Fee Revenue	\$0.00
71100+72000	Interest Income	\$0.00
71600	Gain or Loss on Sale of Capital Assets	\$0.00
71200 + 71300 + 71310 + 71400 + 71500	Other Income	\$0.00
70000	Total Revenue	\$5,381,293.00

ESTIMATED USE OF MTW FUNDING FOR THE FISCAL YEAR

The next table summarizes estimated MTW expenditures of funds for 2016 by FDS line item. The FDS line item format captures only select capital costs. The table does not include funds utilizing Single Fund Flexibility and/or allocated to programs and activities outside traditional operations, for example KH's Affordable Housing and Modernization Program. As a result, comparing totals of the two tables will not provide a clear picture of KH's financial outlook. Expenses which are not captured within the table are described within the narrative of the individual activities which utilize MTW funds in ways not captured by FDS.

Table 6. FY2016 Estimated Uses of Funding by FDS Line Item

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Administrative	\$474,374.00
91300+91310+92000	Management Fee Expense	\$ 0.00
91810	Allocated Overhead	\$ 0.00
92500 (92100+92200+92300+92400)	Total Tenant Services	\$201,544.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$ 0.00
93500+93700	Labor	\$ 0.00
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$ 0.00
95000 (95100+95200+95300+95500)	Total Protective Services	\$ 0.00
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$2,000.00
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$ 0.00
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$ 0.00
97100+97200	Total Extraordinary Maintenance	\$ 0.00
97300+97350	Housing Assistance Payments + HAP Portability-In	\$4,027,580.00
97400	Depreciation Expense	\$1,000.00
97500+97600+97700+97800	All Other Expenses	\$ 0.00
90000	Total Expenses	\$4,706,498

SINGLE FUND FLEXIBILITY

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

LOCAL ASSET MANAGEMENT PLAN

Is the PHA allocating costs within statute? YES

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

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

Has the PHA provided a LAMP in the appendix? NO

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

PUBLIC NOTICE

Keene Housing (KH) invites the community-at-large to review and provide comments regarding the Keene Housing DRAFT Moving to Work (MTW) Annual Plan for FY 2016. The DRAFT FY 2016 MTW Annual Plan includes one proposed new initiatives and changes to several existing activities. The public comment period is open from 8:30 am on Tuesday, September 1, 2015 until 4:30 pm on Wednesday, September 30th, 2015. KH welcomes written comments received at our Administrative Office during the public comment period.

Keene Housing will hold seven (7) public hearings prior to finalizing its FY 2016 MTW Annual Plan. All meetings will occur at the Community Room/FAC of KH-owned or managed property's unless otherwise noted.

Wednesday, September 2nd @ 5:00p – Brookbend Pavilion

Wednesday, September 9th @ Noon – Central Square Terrace

Wednesday, September 9th @ 5:00p– Forest View FAC

Thursday, September 17th @ Noon – Harper Acres Mill Building

Thursday, September 17th @ 5:00p – North & Gilsum FAC

Wednesday, September 23rd @ 5:00p – Keene Housing Main Office

Wednesday, September 30th @ 5:00p – Cutler Elementary, Swanzey

A copy of the DRAFT MTW Plan is available for review at our Administrative Office located at 831 Court Street, Keene, starting from September 1st until September 30th during normal business hours. Electronic versions can be downloaded from www.keenehousing.org or e-mailed to interested members of the public upon request by contacting April Buzby, Planning and Policy Analyst, at (603) 352-6161 or abuzby@keenehousing.org.

Total Attendees: 27

AGENCY DIRECTED EVALUATION OF DEMONSTRATION

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

ANNUAL STATEMENT/PERFORMANCE EVALUATION REPORT

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

Extract of the Minutes of the Regular Meeting of the
Keene Housing Board of Commissioners
October 14, 2015

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

Resolution 532 – Approval of Fiscal Year 2016 Moving to Work Annual Plan

RESOLVED, that the Keene Housing Board of Commissioners approves and adopts the Keene Housing Fiscal Year 2016 Annual Moving to Work Plan; and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated October 7, 2015 from April A. Buzby, Planning and Policy Analyst, to Joshua Meehan, Executive Director.

Motion to adopt: Mr. Moses

Motion seconded by: Mr. Mack

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



Joshua Meehan, Executive Director

10/15/15

Date

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

Attachment B

Certifications of Compliance

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

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning January 1, 2016, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Keene Housing
PHA Name

NH010
PHA Number/HA Code

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

Lee Robator
Name of Authorized Official

Chairperson of the Board of Commissioners
Title


Signature

10-14-15
Date

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

OVERVIEW OF STRATEGIES

As energy increasingly represents a risk to our operations, we are focused on minimizing this risk through establishing sound standard operating procedures for energy management. We are pursuing a data-driven approach to energy conservation to ensure careful allocation of our limited resources. Keene Housing (KH) has engaged Nova Consulting Group, Inc. to oversee our energy program for the agency. This includes energy purchasing, energy conservation, and capital improvement activities as well as maintaining an ongoing energy and water consumption tracking system. We are also reviewing operations to identify cost-effective applications for alternative energy such as wind, biomass, and solar.

SUMMARY OF ROLES AND RESPONSIBILITIES

Nova Consulting, Inc. holds primary responsibility for KH's annual energy plan and participation in the Department of Energy's Better Buildings Challenge. Nova works very closely with KH's administrative and maintenance staff, each of whom have a role in project planning, administration, and finance.

MAJOR INITIATIVES

Benchmarking

As a first step to managing utility expenses, KH compared the utility consumption of each development in the portfolio against a baseline of similar properties. This comparison identified the properties that are good targets for energy improvements. Next, KH developed a priority list of energy conservation projects which was cross-compared to capital improvement plans. With this information, several sites were targeted for further analysis and for energy conservation initiatives to be synchronized with capital needs upgrades.

Incentives and Rebates

KH keeps abreast of all energy efficiency incentive programs for multifamily housing, with a particular emphasis on opportunities for affordable sites. This is an ongoing effort.

Integrating Capital Planning and Energy Management

KH has developed energy models of three developments to guide long term capital planning decisions. The energy models enable an analysis of various improvements or combinations of improvements in a "virtual" setting in order to optimize energy savings and cost effectiveness. This tool is critical when evaluating marginal expenditures for higher performing equipment relative to a "like for like" replacement. The questions we begin to answer are, "Is it worth spending more

money for a boiler with a higher efficiency rating?” Nova can also provide financial metrics for decision making in these areas. KH anticipates developing models for the remaining sites as internal resources and capital planning needs align.

Participation in Local & National Energy Efficiency Programs

KH has chosen to participate in the US Department of Energy’s “Better Buildings Challenge”, a voluntary leadership initiative designed to assist with affect a 20% reduction in energy consumption over the next 10 years. KH was recently approved as a program participant and is looking forward to collaborating with other industry and community leaders to reduce operating costs and environmental impact and improve the comfort and performance of housing stock within the portfolio.

In addition to national programs, KH has been active with NH Local Energy Solutions, attending the conference held in Dover in May to gain perspective and share approaches with other organizations in New Hampshire.

Staff and Resident Training

Through trainings, incentives and challenges, residents will be encouraged to reduce their consumption of KH and tenant paid utilities. We will start with a pilot site and expand the programming to include other KH managed sites. In addition, KH plans to invest in energy efficiency skills for staff and equipment to continue to improve the in-house capability of our Facilities and Assets staff.

SPECIFIC INTERIM TARGETS

Through the Better Buildings Challenge, KH has committed to reducing energy consumption by 20% over the next 10 years. KH intends to incrementally reduce energy consumption annually to meet the 20% target.

EVALUATION MECHANISMS

The primary evaluation mechanism is the regular update to the energy benchmarking. Using industry standard methodology, KH compares actual consumption to the baseline for each asset. Through this, we can track the performance of each energy conservation measure and evaluate its performance.

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INTRODUCTION

Keene Housing (KH) developed this Strategic Plan with the active engagement of the Board of Commissioners, KH management and operations staff and residents. In addition to an updated mission statement, the Plan includes a series of priority goals and initiatives that provide a framework for major agency activities and resource allocation decisions for the three to five year period beginning in January 2015.

The Strategic Plan was presented to the Board for review and approval at their December 2014 meeting. Prior to Board approval, Keene Housing published a draft version of this Plan to provide the public with an opportunity for review and comment.



BACKGROUND ON KEENE HOUSING PROGRAMS, CHALLENGES AND OPPORTUNITIES

- Keene Housing was originally established in 1965 as the Keene Housing Authority pursuant to the New Hampshire Housing Authorities law. Today, KH is one of the largest providers of affordable housing and rental assistance in Keene and the Monadnock region, owning and managing a complex, diverse portfolio of housing resources.
- KH's affordable housing resources include tenant-based rental assistance vouchers funded through the US Department of Housing and Urban Development (HUD) Housing Choice Voucher program. This program consists of 150 vouchers that are targeted specifically for people with disabilities, plus 235 tenant-based vouchers that are available for low-income households selected from KH's waiting list.
- In addition to providing tenant-based rental assistance, KH (through affiliates) owns and/or manages a portfolio of 551 housing units that are assisted with HCV project-based assistance or other forms of subsidy. Due to their age and the limited availability of capital resources, many of these existing units require significant capital investments now and into the near future. Improving and preserving KH's current affordable housing portfolio is a primary goal over the next several years:

Keene Affordable Housing Properties (KAHP) – KAHP consists of 211 rental units in nine (9) former public housing sites that have been converted to Project Based Voucher (PBV) developments. There is an estimated need for approximately \$3.8 million in capital improvements at KAHP developments.

Low Income Housing Tax Credit (LIHTC) Properties – KH's portfolio includes 164 LIHTC family and senior rental units located in four developments (Riverbend, Evergreen Knoll, Stone Arch Villages and Brookbend East and West). Financing sources and operating subsidies for these developments come from a variety of State, Federal, and private sources. The initial LIHTC compliance period is over for the twenty-four (24) units at Riverbend, creating the need for refinancing and/or other efforts to preserve its long-term viability and affordability. Excluding the Brookbend developments, which were completed in 2014, there is an estimated need for approximately \$1.88 million in capital improvements at these sites.

HUD Multifamily Section 8 Properties – This includes two (2) developments consisting of a total of 108 family and senior/disabled rental units. Both Meadow Road (18 units) and Central Square Terrace (90 units) have significant capital needs, estimated at approximately \$580,000.

Homeless Shelters – KH owns a 14 bed men’s shelter on Roxbury Street and a 20 bed family shelter on Water Street. Both shelters are operated by Southwestern Community Services with operating support from KH’s Transitional Housing Assistance Subsidy Program (THASP).

Special Programs/Management Only – This property grouping includes forty (40) units including the Ash Brook development of twenty-four (24) rental units managed by KH; two group homes for persons with disabilities owned by Monadnock Family Services (MFS).

- The cost of utilities, labor and other expenses associated with owning and managing rental properties continues to out-pace the revenue received by Keene Housing through its HUD and other subsidy sources. Given the extreme pressures on the federal budget, it appears unlikely that this trend will reverse itself. Thus, efforts to conserve energy and to implement management innovations and other cost-saving measures are strategically important goals now and into the future.
- With a median rent of \$1,039 in 2013 and a very low vacancy rate, the demand for affordable housing in Keene and the surrounding area is high. Waiting times for low-income households on KH’s property waiting lists range from one to seven years. The average waiting time for a tenant-based voucher is approximately three years. In light of increasing demand, KH has prioritized both the need to preserve its existing housing portfolio as well as to preserve other at-risk affordable developments and expand the supply of affordable housing in the Monadnock region.
- Residents of Keene Housing are some of the region’s poorest citizens: Median household income is \$13,680; 33% of household heads are disabled; 58% of all household income comes from Social Security and Social Security Disability payments; and, only 23% of households have income from employment. Almost 500 children live in KH developments or homes receiving KH rental assistance. Based on family income and other factors, they are at-risk for low school performance, involvement with the criminal justice system, health issues and other problems.
- Keene Housing’s mission statement acknowledges the importance of providing supportive services in tandem with affordable housing as a means to strengthen and empower residents. Towards this end, KH has implemented innovative rent policies and partnered with local agencies on an array of supportive service programs. Work-able adults receiving housing assistance through the Moving to Work Housing Choice Voucher Program participate in the Resident Self Reliance (RSR) and Stepped Subsidy Program (SSP) designed to encourage work, improve educational attainment, increase financial literacy and succeed in meeting lease obligations. Family Activity Centers (FAC) at KH’s North & Gilsum and Forest View properties provide a focal point for these services as well as for the new Keene Housing Kids Collaborative (KHKC) initiative. In

collaboration with Keene Public Schools and other partners, KHKC will focus intensive services to support youth from preschool through high school. Both ongoing work to support economic self-sufficiency among adults and the new initiative to support healthy youth development are considered high priority goals under the Strategic Plan.

- Keene Housing is one of only thirty-nine (39) Public Housing Authorities in the country selected to participate in the federal Moving to Work (MTW) program. MTW is a demonstration program created by Congress under which Keene and other participating agencies are able to waive some provisions of the US Housing Act of 1937, flexibly use their funding to support approved purposes, and test out locally determined strategies that help address one or more of MTW's statutory objectives. These statutory objectives focus on expanding housing choice, encouraging resident economic self-sufficiency, and achieving operational efficiencies.
- The MTW Agreement between Keene Housing and HUD is currently slated to expire in 2018. Given the enormous negative impact that termination of MTW status would have on the availability of housing and service program resources, Keene Housing views extension of the MTW Agreement beyond 2018 as one of its top priority goals.

MISSION STATEMENT

Early in 2013, KH 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. This self-reflection resulted in a new name, logo, and branding that better reflected our role as more than providers of affordable housing but also as advocates for our low-income neighbors and the community we call home. The last phase of this process is the adoption of a new mission statement that conveys who we are.

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of it. The mission statement provides the basis for strategy development, identification of critical success factors, resource allocation decisions, as well as ensuring client and stakeholder satisfaction. After extensive engagement of KH's Board of Commissioners, management and operations staff, and residents, KH adopted the following revised mission statement:

"Keene Housing provides and advocates for affordable housing and supportive services that strengthen and empower low and moderate-income households in the Monadnock region."

STRATEGIC GOALS AND OBJECTIVES

To respond to the challenges and opportunities facing Keene Housing, the following eleven (11) strategic goals are adopted:

- Goal 1. Preserve, maintain and improve Keene Housing's existing housing portfolio
- Goal 2. Preserve and expand the Monadnock region's affordable housing stock
- Goal 3. Promote energy conservation and sustainability
- Goal 4. Prudently manage and oversee agency finances
- Goal 5. Achieve excellence in management
- Goal 6. Promote wellness and independence among seniors and residents with disabilities
- Goal 7. Support greater resident self-sufficiency
- Goal 8. Focus on healthy youth development
- Goal 9. Build staff and Board capacity and skills
- Goal 10. Enhance customer service and operational efficiency
- Goal 11. Foster innovation through the Moving to Work program

The Strategic Goals are intended as a framework to help shape major activities and budget priorities over the next three to five years. For each goal, a set of related Objectives and Priority Projects are identified as summarized on the following pages. As circumstances change and new challenges and opportunities present themselves, the goals and objectives may be modified accordingly. For example, significant decreases to agency funding may require that some priority projects be reconsidered. The Executive Director will monitor and report periodically to the Board of Commissioners on the status of each goal and priority project.

GOAL 1: PRESERVE, MAINTAIN AND IMPROVE KH'S EXISTING HOUSING PORTFOLIO

KH's existing portfolio (551 units) of affordable housing developments represents an enormous investment and an irreplaceable community asset. Improving physical conditions at KH developments and ensuring their ongoing financial viability are essential to the quality of life for current residents and for the preservation of these resources for future generations. This goal encompasses a broad range of planned activities including high priority capital improvements, landscaping and other initiatives to improve "curb appeal", preventive maintenance and, at selected sites, analysis of future ownership and/or refinancing options.

Objective

- Address priority capital needs
- Restructure financing where needed to ensure viability and long-term affordability
- Streamline ownership structures where feasible
- Identify and secure new funding to support capital needs including broader use of MTW funds
- Improve "curb appeal"

Priority Projects

- 1.1** Update and implement preventive maintenance plans system-wide
- 1.2** Develop and implement portfolio-wide landscape and grounds improvement and maintenance plan
- 1.3** Implement approved Capital Plan activities with a focus on life safety issues and building envelope projects, in a manner that keeps residents informed and minimizes the disruptions to their lives
- 1.4** Update Physical Needs Assessment on a five-year cycle
- 1.5** Assess construction defects and implement corrective action plan at Harper Acres, North & Gilsum and Forest View
- 1.6** Develop and implement refinancing/recapitalization plans for Riverbend and Central Square Terrace
- 1.7** Conduct a feasibility study to assess needs, ownership options and future strategies for scattered site units and shelters
- 1.8** Create and capitalize a working capital account for modernization and acquisition

GOAL 2: PRESERVE AND EXPAND THE REGION'S AFFORDABLE HOUSING STOCK

The increasing cost of rents in the Monadnock region, combined with very low vacancy rates, highlights the urgent need to preserve existing affordable housing units while also expanding the regional supply. In tandem with efforts to maintain and preserve its existing housing portfolio, Keene Housing's goal is to leverage its resources to address broader, regional housing needs through a combination of preservation and new development initiatives.

Objective

- Leverage Project Based Vouchers and the Transitional Housing Assistance Subsidy Program (THASP) as regional preservation and expansion tools
- Pursue development opportunities that respond to identified, quantifiable regional housing needs
- Protect long-term affordability of the region's Expiring Use properties

Priority Projects

2.1 Undertake at least one development project by 2020

2.2 Evaluate potential role in local efforts to re-purpose vacant and/or underutilized Keene properties

2.3 Assess regional need for, and feasibility of, expanded Affordable Housing Preservation Program

GOAL 3: PROMOTE ENERGY CONSERVATION AND SUSTAINABILITY

Energy costs represent Keene Housing’s largest single category of non-personnel operating expense. Focusing on reducing current utility consumption and incorporating energy efficient, sustainable materials into capital projects is the focus of this strategic goal.

Objective

- Leverage energy conservation and investment strategies to lower costs and reduce carbon footprint
- Integrate conservation and sustainability into modernization and development planning

Priority Projects

3.1 Assess options and develop an energy reinvestment/sustainability plan exploring generation options, use of sustainable materials and other strategies for reducing consumption and promoting sustainability

3.2 Evaluate options for replacing electric heat systems and, if financially feasible, implement at North and Gilsum and Forest View

3.3 Monitor utility consumption to inform choices and quantify savings from retrofits

GOAL 4: PRUDENTLY MANAGE AND OVERSEE AGENCY FINANCES

Ongoing reductions in federal housing expenditures have severely constrained Keene Housing's ability to fully address capital, supportive service and other needs. Over the next several years, there appears to be little likelihood that this situation will be reversed. Utilizing its MTW flexibility, KH has worked to maximize the resource leveraging impact of its available funds, while implementing creative management policies that have helped to keep per unit housing cost increases to a manageable level. KH's Strategic Goals in this area include efforts to diversify funding sources, increase non-federal financial reserves and contain operating costs.

Objective

- Strengthen financial analysis and reporting capabilities
- Contain/minimize operating costs
- Expand and diversify funding sources to reduce reliance on HUD and USDA
- Increase non-federal operating reserves
- Maximize potential rent for commercial spaces

Priority Projects

4.1 Create and implement an agency-wide Financial Management Plan

4.2 Regularly renew and update cost allocation methodology

4.3 Conduct analysis of benefits and health insurance costs pursuing cost-effective but equitable opportunities where feasible

4.4 Conduct analysis of property insurance costs pursuing cost effective opportunities where feasible

4.5 Identify and secure additional revenue through grants, increased management fees, and other initiatives

4.6 Evaluate and, if feasible, increase commercial rents

GOAL 5: ACHIEVE EXCELLENCE IN MANAGEMENT

A commitment to providing high quality property management and maintenance services to all residents is at the core of Keene Housing's organizational culture. This strategic goal focuses on achieving industry-leading performance on key performance indicators including occupancy, vacancy turnaround, rent collections and work order completion. Documenting and implementing best practice procedures throughout the organization is a major objective under this goal. KH will also collaborate with affordable housing providers throughout the country to create a national Affordable Housing Accreditation system.

Objective

- Maximize utilization of available voucher and housing resources
- Meet or exceed performance goals related to property management and maintenance indicators
- Document and maintain policies and procedures that meet applicable regulatory requirements
- Become accredited

Priority Projects

5.1 Maintain 96% utilization in MTW voucher program, 98% in the Mainstream and Non Elderly Disabled voucher programs, and 98% occupancy in the owned and managed portfolio

5.2 Develop and implement Housing and Programs and Services policy and procedures manuals including an annual review/revision plan

5.3 Review and revise all Agency forms including an annual review/revision plan

5.4 Develop and implement an agency-wide Quality Control protocol

5.5 Work with Affordable Housing Accreditation Board (AHAB) to help inform and create industry-wide accreditation standards

5.6 Improve business systems and governance practices as needed to meet Accreditation standards

GOAL 6: PROMOTE WELLNESS AND INDEPENDENCE AMONG SENIORS AND RESIDENTS WITH DISABILITIES

Seniors and people with disabilities comprise a substantial percentage of Keene Housing's residents. This strategic goal reflects a commitment to assist elderly and disabled residents to live independently and to access health care and other services. Primarily this will continue to be accomplished through partnerships with local agencies that have the necessary resources and expertise. Efforts will be undertaken to secure funding for site-based service coordinators to assist in linking residents to local resources.

Objective

- Leverage resources to secure funding and services

Priority Projects

- 6.1** Secure new funding or allocate existing funding to hire elderly/disabled resident coordinators
- 6.2** Evaluate feasibility of implementing home-based services options for elderly and disabled residents
- 6.3** Assess strategies to ensure successful housing search and long-term tenancies for disabled residents and voucher holders

GOAL 7: SUPPORT GREATER RESIDENT SELF-SUFFICIENCY

Assisting work-able residents in finding and keeping employment, improving educational attainment and increasing family assets are key objectives under the MTW Program. The Resident Self Reliance (RSR) and Stepped Subsidy Program (SSP) are innovative strategies adopted by KH that work together to encourage and incentivize residents towards family self-sufficiency. This Strategic Goal incorporates the continued operation and evolution of RSR and SSP and related partnerships and other activities. KH is committed to ongoing program evaluation to determine which program components are effective or ineffective so that policy and procedural changes can be made.

Objective

- Provide incentives for employment and asset building
- Build social connections and sense of community
- Focus on measurable outcomes

Priority Projects

- 7.1** Continue operating RSR and SSP programs with mentoring, incentives, employment and financial literacy tools
- 7.2** Evaluate RSR and SSP annually, using data to inform policy revisions
- 7.3** Define and collect measurable outcomes for Transitional Housing Assistance Shelter Program (THASP)
- 7.4** Evaluate feasibility of establishing Family Activity Centers at additional family sites
- 7.5** Continue expanding partner programming for adults at Family Activity Centers

GOAL 8: FOCUS ON HEALTHY YOUTH DEVELOPMENT

Through the newly formed Keene Housing Kids Collaborative (KHKC), a major effort is being launched to support the healthy development and educational success of KH youth. Working in partnership with the Keene Public Schools, MoCo Arts, and an array of other local agencies, KH is committed to building/strengthening a network of programs and services that support youth development from preschool through high school. During the Strategic Plan term, KH will work with its partners to raise new funds to support expanded after school programming, internships, Individual Development Accounts (IDA) and other initiatives proven to help low-income youth become successful, self-sufficient adults.

Objective

- Build on existing efforts to create a broad service/program network that focuses on youth development from preschool through high school
- Incorporate best practice research to identify evidence based, outcome focused programming
- Achieve collective impact through collaboration with schools and other partners

Priority Projects

8.1 Establish KHKC with MTW seed funding and property management operating proceeds

8.2 Develop and implement long and short-term KHKC fundraising strategy to reduce and ultimately eliminate reliance on MTW funding

8.3 Develop and implement programming including IDA, internship and after school initiatives

GOAL 9: BUILD STAFF AND BOARD CAPACITY AND SKILLS

A capable and well-trained Board and staff are essential for Keene Housing to continue to achieve excellence, foster innovation and address community needs. This goal incorporates ongoing efforts to support and build Board and staff capacity through training on their respective roles and responsibilities, as well as initiatives to regularly solicit feedback from staff and acknowledge high performance.

Objective

- Provide staff with the training needed to excel at their jobs
- Provide opportunities for growth in the work place
- Provide opportunities for local students to learn about KH's work and share their ideas
- Ensure that new and current Board members are fully informed of roles and responsibilities
- Work towards establishing a national Housing Authority Accreditation system

Priority Projects

9.1 Develop and implement agency-wide training plan for all positions including new hires

9.2 Continue bonus program that recognizes extraordinary performance

9.3 Expand Policy & Technology lab to PHAs beyond the Cambridge Housing Authority and attract more local student interns

9.4 Implement periodic employee satisfaction/feedback surveys

9.5 Develop a revised on-boarding packet for new Board members

9.6 Develop regular Board training schedule for new and current members consistent with emerging accreditation standards

GOAL 10: ENHANCE CUSTOMER SERVICE AND OPERATIONAL EFFICIENCY

Streamlining agency operations wherever feasible and striving to continuously improve customer service is the focus of this Strategic Goal. Towards this end, Strategic Goal 10 incorporates activities to upgrade KH's website and other technologies, provide more helpful and timely information to residents and minimize disruption to residents and employees in the event of natural disaster or other unforeseen event.

Objective

- Implement an agency-wide technology plan that helps streamline work processing and improves public/resident access to information
- Implement a communications plan that improves the accuracy and timeliness of information provided to residents
- Provide additional opportunities to receive and respond to public feedback
- Implement a disaster response and recovery plan

Priority Projects

10.1 Develop and implement short and long-term strategies for website enhancements, network support, document management, cloud computing, disaster recovery, and enhanced use of electronic communications

10.2 Develop and implement a Communications Plan that uses technology to improve the timeliness and accuracy of information about KH plans and strategies for residents, community stakeholders and other target audiences

10.3 Develop and implement a plan to utilize technology, satisfaction surveys, and focus groups to solicit feedback on KH programs and initiatives

10.4 Work with local, regional and national experts to develop a disaster response plan that accounts for the safety of residents and staff as well as the need to recover quickly from a natural disaster

GOAL 11: FOSTER INNOVATION THROUGH THE MOVING TO WORK PROGRAM

Participation in the MTW Program is a critically important component of Keene Housing's strategy to preserve and expand its portfolio of affordable housing resources and to support residents in securing jobs and improving economic self sufficiency. This goal incorporates activities to secure a long-term extension to the MTW Agreement with HUD and to continue to use MTW flexibility to support innovation and excellence.

Objective

- Secure an MTW Agreement extension beyond 2018
- Utilize MTW flexibility to improve operations, increase efficiency and implement innovative solutions

Priority Projects

- 11.1** Collaborate with other MTW agencies, HUD, industry groups and Congress to secure a ten-year extension of the MTW agreement or permanent MTW status
- 11.2** Conduct ongoing evaluations of MTW activities, and use results of evaluations to improve/modify activities as needed
- 11.3** Develop and implement an effective Rent Simplification program for the Affordable Housing Preservation initiative that can be replicated at other agencies

APPENDIX III. MTW ACTIVITIES MATRIX

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

<u>Activity Number</u>	<u>Activity Name</u>	<u>Plan Year Approved</u>	<u>Current Status</u>	<u>Change Year</u>	<u>Change</u>	<u>Reasoning</u>
1999.05.SS	Resident Self-Reliance Program	FY1999	Active	2013	Increased mandatory participation from 3 years to 5 years before a waiver would be considered	Families that received a waiver after 3 years consistently struggled with tenancy issues, such as paying rent on time and lease compliance. Determined that 3 years was not sufficient to gain self-supports needed to succeed.
				2014	Implemented individualized goal plans. Establish Development Grants and Rent Credit fund. New compliance rules and meeting schedule. Removed waiver option for all households.	Provide RSR participants more individualized options for attaining financial stability and self-sufficiency.
			Pending	2016	Require households that received a waiver prior to 2015 return to RSR program is their Step 3 TTP exceeds 30% of gross income.	On average, waived households remain in housing assistance longer than no waived households. Provides access to RSCs and DGRC funds to promote greater self-sufficiency.
1999.06.HC	Transitional Housing Assistance Subsidy Program (THASP)	FY2000	Active			
1999.07.HC	Rent Reasonableness Determination Discontinuance	FY1999	Active			
1999.08.HC	40% Affordability Discontinuance	FY1999	Active			
2005.01.CE	Elderly and Disabled Household Alternative Recertification Schedule	FY2005	Active	2013	Added COLA certification for household's whose sole income source is SS/SSI and asset value is less than \$5,000.	Cut recertification processing time by 1 hour per recertification for households that would qualify for a COLA recertification, saving approximately 100 staff hours.
				2014	Eliminates triennial certifications. Self-certification only for households with Pensions or Assets over \$50,000. Creates annual Well Checks.	Administrative cost savings of nearly \$5,000 and staff time reduction of 330 hours per year.

<u>Activity Number</u>	<u>Activity Name</u>	<u>Plan Year Approved</u>	<u>Current Status</u>	<u>Change Year</u>	<u>Change</u>	<u>Reasoning</u>
2005.02.CE	Stepped Subsidy Recertification Schedule	FY2005	Active	2014	Eliminates triennial recertifications for households who have reached Step 3. KH will use annual EIV check to determine if a family has met the \$0 HAP threshold.	Reduce administrative costs and provide households the opportunity to increase income and savings without concern about rent increases
2006.01.CE	Standard Deductions	FY2006	Inactive	2013	Discontinued	
2008.01.HC	Project-Based Voucher Program	FY2008	Active	2011 2014	Increased percentage of KH's MTW allocation available for PBV use from 50% to 60%. Percentage of voucher funding available for PBVs, in excess of 60%, will increase equal to funding approved through the Affordable Housing Preservation Program.	Expand and/or improve affordable housing options Expand and/or improve affordable housing options
2008.02.CE	Restrictions on Section 8 Portability	FY2008	Active	2014 2015	Added "ability to demonstrate an economic opportunity" to permitted reasons for porting. Removed portability restrictions for elderly and disabled households.	Provide households an opportunity to pursue economic opportunities without potentially losing housing assistance Expand and/or improve affordable housing options
2005.03.HC	MTW Homeownership Flat Subsidy	FY2005	Active			
2011.01.CE	Housing Quality Standards (HQS) Biennial Inspection Schedule	FY2011	Active			
2013.01.SS	\$0 HAP Rent Burden Test	FY2013	Active			
2013.02.CE	HQS Alternative Inspection Protocol	FY2013	Active			
2014.01.HC	Affordable Housing Preservation Program (AHPP)	FY2014	Active			

<u>Activity Number</u>	<u>Activity Name</u>	<u>Plan Year Approved</u>	<u>Current Status</u>	<u>Change Year</u>	<u>Change</u>	<u>Reasoning</u>
2014.02.CE	Medical Deduction Threshold	FY2014	Active			
2014.03.SS	Asset Exclusion Threshold	FY2014	Active			
2014.04.SS	Keene Housing Kids Collaborative	FY2014	Active			
2014.05.HC	Affordable Housing Preservation and Modernization Program	FY2014	Active			
2015.01.CE	AHPP Rent Reform	FY2015	Active			
2015.02.CE	AHPP Alternative Inspection Protocol	FY2015	Active			
2015.03.CE	Earned Income Disallowance (EID) Discontinuance	FY2015	Active			
2016.01.CE	Project-Based Unit Agency Conducted Inspections	FY2016	Pending			

MOVING TO WORK (MTW) RELATED COMMENTS

Comment (C): One commenter asked for clarification of KH's proposed Project-based Unit Agency Conducted Inspections activity and whether it would result in increased inspections.

Response (R): The proposed activity will not change how often project-based voucher units are inspected. The activity only permits us to continue using a KH employee to conduct HQS inspections for our owned and managed properties until a third party inspector can be found.

C: One commenter asked if the expansion of the definition of fixed income for COLA recertifications would increase the frequency of recertifications.

R: No, the expansion of the definition of fixed income will not change how often a household is recertified. COLA recertifications reduce a household's requirement to prove income in cases where income changes little and is based upon the annually published Cost of Living Adjustment (COLA).

C: One commenter asked how COLA recertifications affect a household's eligibility for medical deductions.

R: If a household that receives a COLA recertification believes their out of pocket medical expenses exceed KH's medical deduction threshold, they can contact their Tenant Assistance Specialist and request a regular recertification.

C: One commenter asked if Funeral Expenses, Term Life Insurance, and Whole Life Insurance accounts are counted as income.

R: Funeral Expense and Whole Life Insurance accounts are considered assets, as such, the funds will not be included in the household's income calculation unless the total value of all assets exceeds \$50,000. We do not count Term Life Insurance as income or an asset.

C: One commenter questioned why KH is requiring households waived from the RSR program to return to active status as some of these households have maintained full time employment for an extended period of time.

R: An evaluation of the RSR program shows that households waived from programmatic requirements have consistently lower economic success rates than households that actively participate in the program. Active households have access to a variety of services, opportunities, coaching, and mentoring tailored to their specific household goals. Additionally, waived households returning to active status will be able to access Development Grant and Rent Credit funds which help offset financial barriers to economic success. These supports help households attain

their financial goals and reduce their need for housing assistance. It is for these reasons that KH has decided to return waived households to active status in the RSR program.

C: One commenter proposed changing the \$0 HAP Threshold to be based upon the lesser of gross rent or the voucher payment standard (VPS).

R: Thank you for the suggestion. KH uses gross rent as a portion of gross income as an indicator that a household has reached economic self-sufficiency and no longer needs housing assistance to afford market rents. To change the threshold to include the lesser of gross rent or VPS would make us rely on voucher holders' ability to find units at VPS, which may not always be the case. While we do our best to maintain a VPS that is consistent with market rents, the nature of how and when VPS is calculated means we cannot respond as quickly to market variabilities as would be necessary to make the VPS criteria work. For this reason, we have decided not to use VPS as an indicator of a household's ability to pay rent.

NON-MTW RELATED COMMENTS

C: Several commenters at Harper Acres thanked KH for the new picnic table.

R: We are happy to hear residents like the new table.

C: Some commenters at Harper Acres expressed concerns that several trees around the property had loose branches that may come down during a storm.

R: We are aware of the issue. The landscaper selected to complete the landscaping project at Harper Acres and Meadow Road has removed the dead trees. For those trees that are still healthy, a crew will be cleaning up the loose branches.

C: Several commenters provided positive feedback about the new landscaping company.

R: Thank you for your feedback. Improving the properties' curb appeal has been a high priority for us over the past year and finding the right landscaper is a critical part of that effort.

C: One commenter pointed out that the current plowing policy may require elderly and disabled residents to move their vehicle during the early morning hours when the lights are low and sidewalks are still covered. She asked if it was possible to have the plow drivers arrive at later to accommodate.

R: Thank you for the suggestion. KH takes resident safety seriously and we appreciate the suggestion. Since we need to keep the roadways and parking lots clear for emergency vehicles we cannot promise that we will always be able to

plow at a later time. However, if emergency access is not an issue we can certainly work to begin plowing at a later time where appropriate.

C: One commenter asked if we are planning to install security cameras at all properties.

R: It is not KH's intent to install security cameras throughout our portfolio.

C: A commenter at Harper Acres asked whether KH could provide storage units for residents.

R: Unfortunately due to the number of apartments at Harper Acres it is unlikely we will be able to provide individual storage units for all residents. We may look into other options in a future budget year.

C: One commenter asked if KH plans to have a social worker or services coordinator on staff dedicated to elderly and disabled households.

R: KH will be adding a elderly/disabled Resident Services Coordinator to our staff in 2016.

C: Several commenters noted that the lighting in Central Square Terrace's outdoor breezeway is dim and the switches are not matched with sunrise and sunset.

R: Thank you for letting us know. We will have the lights checked and repaired or replaced as needed.

C: Several commenters at Central Square Terrace and Harper Acres voiced concern over people smoking in their units or directly outside open windows.

R: Thank you for voicing your concern. KH would like to remind residents that smoking in units is prohibited on all properties and that, if they wish to smoke, residents must be at least 20 feet from all windows and doors or in a designated smoking area. Residents are encouraged to let their property manager know if someone is smoking outside of a permitted area.

C: Several commenters thanked KH maintenance for their work, including timeliness, quality, and choosing to replace broken appliances rather than trying to fix them.

R: Thank you for your comments. Our maintenance staff takes pride in their work ,which is reflected in the quality of their work and the speedy turnaround on work orders, which in 2015 was under 24 hours.

C: Several commenters at Central Square Terrace requested updated/new furnishing for the common areas as the current furniture is old and in some cases damaged.

R: We have budgeted for new furniture and are actively looking for furniture that is both attractive and suited to the needs of Central Square Terrace's elderly and disabled residents. If any residents have suggestions, feel free to provide them to the Housing staff.

C: Commenters at Central Square Terrace requested window boxes for the front facade of the building and new awnings over the commercial spaces.

R: Thank you for your interest in making Central Square Terrace an attractive place to visit and live. We will be doing facade work in 2016 and new awnings have been ordered. Once that work is completed we can look at whether flower boxes can be placed on the Central Square side of the building.

C: One commenter asked if KH could place rent drop boxes at locations other than central office.

R: Due to security concerns it is not possible to place drop boxes at all properties. However, if you are interested in avoiding a trip to central office we suggest contacting your property manager about signing up for free auto deduction from your bank account.

C: One commenter asked if parking spots could be assigned at Harper Acres.

R: There currently are not enough parking spaces at Harper Acres to provide an assigned spot to each resident. We are working with the city to expand the number of spaces available but, due to land availability, it will still not be enough space to provide enough parking spaces for everyone. Parking spots at Harper Acres are on a first-come, first-served basis and we ask that residents be respectful of each other's right to park in any spot available. We encourage our disabled residents to apply for a Reasonable Accommodation (RA) if this policy causes a burden or safety issue. If interested, please contact your property manager for more information.

C: One commenter at Harper Acres expressed concerns that existing, resident tended flowerbeds will be removed or damaged in the upcoming landscaping work.

R: The landscaper has been given instruction to not remove any maintained flower beds.

C: One commenter asked if RSR participants can receive rent credits for attending homeownership workshops or other activities.

R: Yes, attendance to workshops or participation in an activity consistent with your Three Year Goal Action Plan is eligible for a Rent Credit.