

2015 MTW Annual Plan



SUBMITTED OCTOBER 2014
RESUBMITTED JANUARY 2015



CONTENTS

I. INTRODUCTION	4
<i>Overview of Keene Housing’s Short Term Goals</i>	<i>5</i>
<i>Long-Term MTW Plan</i>	<i>6</i>
II. GENERAL OPERATING INFORMATION	8
<i>Housing Stock Information</i>	<i>8</i>
<i>Leasing Information</i>	<i>11</i>
<i>Wait List Information.....</i>	<i>12</i>
III. PROPOSED MTW ACTIVITIES.....	14
<i>2015.01.CE Affordable Housing Preservation Program (AHPP) - Rent Reform</i>	<i>14</i>
<i>2015.02.CE Affordable Housing Preservation Program (AHPP) – Alternative Inspection Schedule</i>	<i>17</i>
<i>2015.03.CE Earned Income Disregard (EID) Elimination</i>	<i>19</i>
IV. APPROVED MTW ACTIVITIES	21
<i>1999.01.HC Eligibility Administration Guidelines.....</i>	<i>22</i>
<i>2008.03.HC MTW Homeownership Flat Subsidy</i>	<i>22</i>
<i>1999.02.CE Housing Quality Standards (HQS) Landlord Self-certification Inspection Protocol</i>	<i>23</i>
<i>1999.03.CE Rent Reasonableness Neighborhood Analysis Discontinuance</i>	<i>24</i>
<i>1999.07.HC Reasonable Rent Determination Discontinuance</i>	<i>24</i>
<i>1999.08.HC 40% Affordability Discontinuance.....</i>	<i>25</i>
<i>1999.04.CE Stepped Subsidy Rent Reform</i>	<i>25</i>
<i>2013.01.SS \$0 HAP Rent Burden Test</i>	<i>26</i>
<i>1999.05.SS Resident Self-Reliance (RSR) Program</i>	<i>27</i>
<i>1999.06.HC Transitional Housing Assistance Shelter Program (THASP) (Formerly Shelter Housing Assistance Coupon).....</i>	<i>29</i>
<i>2005.01.CE Elderly and Disabled Household Alternative Recertification Schedule</i>	<i>29</i>
<i>2005.02.CE Stepped Subsidy Recertification Schedule</i>	<i>30</i>

2008.01.HC Project-based Voucher Program (formerly Project-Based Coupons).....	30
2008.02.CE Restrictions on Section 8 Portability	31
2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule	31
2013.01.CE Housing Quality Standards (HQS) Alternative Inspection Protocol.....	32
2014.02.CE Medical Deduction Threshold.....	33
2014.02.SS Asset Exclusion Threshold	33
2014.04.SS Keene Housing Kids Collaborative (KHKC)	34
2014.03.HC Affordable Housing Preservation & Modernization Program	34
Not Yet Implemented Activities	34
Activities on Hold.....	35
Closed Out Activities	35
2006.01.CE Standard Deductions.....	35
V. SOURCES AND USES OF FUNDING	36
<i>Estimated Sources of MTW Funding for the Fiscal Year.....</i>	<i>36</i>
<i>Estimated Use of MTW Funding for the Fiscal Year.....</i>	<i>36</i>
<i>Single Fund Flexibility</i>	<i>37</i>
<i>Local Asset Management Plan</i>	<i>38</i>
VI. ADMINISTRATIVE	39
<i>Public Notice</i>	<i>39</i>
<i>Agency Directed Evaluation of Demonstration</i>	<i>39</i>
<i>Annual Statement/Performance Evaluation Report</i>	<i>39</i>
APPENDIX I: IMPACT ANALYSIS.....	43
APPENDIX II: MTW ACTIVITIES.....	44
APPENDIX III: PUBLIC COMMENT.....	45
<i>MTW Related Comments</i>	<i>45</i>
<i>Non-MTW Comments.....</i>	<i>46</i>

I. INTRODUCTION

Established in 1965, Keene Housing's (KH) long standing reputation for innovation and high performance helped us become one of the initial 12 public housing authorities (PHAs) chosen to participate in the Department of Housing and Urban Development's (HUD) Moving to Work (MTW) deregulation demonstration program in 1999. By waiving many of the regulations that normally apply to PHAs administering Housing Choice Voucher Program, MTW provides us the freedom to test innovative ways to develop and maintain more, higher quality affordable housing than is possible outside of MTW. MTW also provides us the opportunity to explore new ways for providing the educational, vocational and social supports low-income households need to improve their socio-economic outcomes. MTW flexibility allows us to reject a one-size-fits-all approach to helping the families we serve and instead allows us to take advantage of, and react to, the unique opportunities and challenges we face here in New Hampshire's Monadnock region.

By jettisoning all but a few of the most burdensome and costly regulations most PHAs must navigate, MTW PHAs are free to explore a host of financial, programmatic, and development strategies that save tax payer dollars while providing high quality services to our neediest neighbors. While MTW's detractors (of which there is a small, but very vocal cabal) are loathe to admit it, many of the innovations curated by MTW agencies are finding thier way into statute. 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 Program, are common sense improvements that many MTW agencies implemented years ago.

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

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

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

Choice

Support the households we serve by offering them a menu of housing, program, and service options that provide each household opportunities to meet their unique socio-economic needs while pursuing opportunities for developing, on our own or in partnership with others, new affordable housing for our region's low-income residents.

Collaboration

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

Independence

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

OVERVIEW OF KEENE HOUSING’S SHORT TERM GOALS

KH spent much of 2014 monitoring its activities and expanding our partnerships in the community. Partnerships with local youth programs have given our youth opportunities normally unavailable to low-income households such as access to dance and creative arts classes at MoCo Arts, archery classes, and soccer league at the Keene Recreation Center, classes and activities at the two local YMCAs, and experiences in community gardening and healthy living. For our adult population, our partners have provided free make-overs for individuals preparing for job interviews, healthy eating and nutrition classes, and free trainings from the school district for parents of children aged 0-4 that help the parents get their toddlers ready for kindergarten. Many of these opportunities are only possible with the funding flexibility MTW provides.

Feedback from participants and the community indicates that these partnerships, many of them still in their infancy, are already working in small and large ways: from increasing kindergarten academic readiness and instilling community connections to providing adults positive self-images that push them to explore employment and education options they once thought out of reach.

These partnerships represent KH and the community’s commitment to helping our low-income neighbors understand that they are not defined by their economic status or where they live. They also are a testament to the power MTW flexibility has to elevate low-income households out of the cycle of intergenerational poverty by providing them with the tools every person needs to succeed. Without MTW flexibility many of these partnerships would not have been possible. KH’s ability to commit funding and staff to coordinate all the pieces necessary for these programs to work is only possible through the administrative and cost efficiencies our local initiatives provide us.

MTW flexibility also allows us to support our housing portfolio’s long-term capital needs. While most non-MTW agencies must rely on the shamefully inadequate Capital Fund Program to support their portfolios’ capital needs, KH uses the flexibility MTW provides to pro-actively address both routine and non-routine capital needs throughout its portfolio. MTW’s ability to help bolster 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.

In the short term, KH plans to continue engaging community partners and expanding the variety of services available to our participants. Through the non-profit developed using our Keene Housing Kids Collaborative activity we will provide not just educational, sports, and creative activities for our youth but also internships, homework help, and eventually, funding permitting, Individual Development Accounts (IDA) that combined provide older youth the skills and resources needed to pursue secondary education or enter the workforce. Our Resident Service Coordinators will look for new opportunities to provide work-able adults the skills and supports they need to be successful, healthy wage earners. And our staff continues to monitor the needs of our elderly and disabled households so we can connect them to the services, or inform the community of gaps in services, needed to age in place with dignity and safety.

KH is also always looking at ways to increase the number of households we serve. In 2014, KH served approximately 1,000 households through our MTW and non-MTW programs, around half through our MTW HCV and PBV programs alone. For 2015 we have set the goal to increase the number of households we serve in the MTW HCV, PBV, and THASP programs to over 1300. All programs and properties combined, KH will be providing housing assistance to over 5% of our community's population by the close of 2015. The impact on our waiting lists will be significant as we expect the wait for a MTW Housing Choice Voucher to drop from 5 to 3 years.

LONG-TERM MTW PLAN

As this Annual Plan is being drafted a 10-year extension to our MTW Agreement (from 2018-2028) is being negotiated with HUD. It is difficult to articulate a long-term plan at this point because HUD is proposing, as a condition of an extension, a re-benchmarking of our MTW funding based solely on Housing Assistance Payments (HUD-speak for the payments we make to owners in the voucher program) made in 2018. At this early date in negotiations it appears that HUD would only consider costs related directly to the provision of housing when re-determining how much funding we will be eligible to receive in 2019. If that were to happen it is very unlikely that we would be able to continue building, or even maintaining any of the resident service, capital maintenance or new affordable housing programs that are essential to the core of who we are as an organization and critical to the role we play in our community.

If HUD's re-benchmarking proposal is not altered substantially, or preferably rescinded altogether, it appears that KH stands to lose, without recourse or a path to restoration, funding that we earned through innovation and careful planning over these past 14 years of MTW participation. It is hardly an exaggeration to characterize HUD's proposed re-benchmarking as an existential threat to the programs and partnerships that our residents, staff and community have grown to rely upon.

As of this writing, KH can have only one long-term goal: to secure an extension to our MTW Agreement that does not diminish or weaken in any way 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.



“Courage and perseverance have a magical talisman, before which difficulties disappear and obstacles vanish into air.”

— John Quincy Adams



II. GENERAL OPERATING INFORMATION

HOUSING STOCK INFORMATION

Keene Housing owns or manages 551 units of affordable housing including two homeless shelters, two HUD multi-family properties, six Low Income Housing Tax Credit (LIHTC) properties, two homes for chronically mentally ill, and ten former public housing developments.

MTW plays an integral part in the management of our entire portfolio. Both our former public housing portfolio and many of our LIHTC properties include MTW Project Based Voucher (PBV) subsidies; our homeless shelters utilize shallow subsidies provided through our Transitional Housing Assistance Subsidy Program (THASP); and in 2015 we are completing the conversion of Meadow Road, an expiring use Project-Based Section 8 property, to MTW PBVs through our Affordable Housing Preservation initiative. For a clearer picture of which units benefit from our participation in MTW, please see the table provided on page 10.

In late 2014¹, we completed transferring ownership of Wedgewood, a thirty (30) unit multi-family property, to our community partner Southwest Community Services (SCS). Through a combination of LIHTC, Community Development Block Grant (CDBG) and other funding, SCS is able to perform a long-overdue rehabilitation of the property. KH and SCS have worked hard to get this project moving and are excited to finally see forward momentum.

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 2015.

Amp Name and Number	Bedroom Size							Total Units	Population Type*	# Of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0				
N/A	0	0	0	0	0	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

¹ As of this draft the sale of Wedgewood is scheduled for late October 2014

Planned Public Housing Units to be Removed During the Fiscal Year

KH does not own any public housing units at this time.

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

In June 2015, KH will add the 18 units at Meadow Road to our PBV inventory as part of our Affordable Housing Preservation activity. In addition, we are adding 3 PBV units at Evergreen Knoll.

Table 1. New PBVs anticipated in FY2015.

Property Name	Anticipated Number of New Vouchers to be Project- Based*	Description of Project
Meadow Road	18	Former S8 Multifamily property; 18 townhouse style 2- and 3-bedroom units
Evergreen Knoll	3	Rural Development/LIHTC property with townhouse style 2- and 3-bedroom units
Anticipated Total New Vouchers to be Project- based	21	Anticipated Total Number of PBVs Committed at the End of the Fiscal Year
		Anticipated Total Number of PBVs Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year
		357
		357

*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.

Keene Housing Owned and Managed Portfolio

	Units	Population	Subsidy
Main Developments (Former Public Housing)			
Keene Affordable Housing Properties (KAHP)	210	Family	MTW PBV — ALL UNITS
Project-Based Rental Assistance (PBRA)			
Central Square Terrace	90	Senior and Disabled	Multifamily Section 8
Emerald Street House	10	Chronically mentally ill	Section 202
Low Income Housing Tax Credit (LIHTC) Properties			
Riverbend	24	Family	MTW PBV — ALL UNITS
Evergreen Knoll	32	Family	Rural Development/ HOME/MTW PBV — 3 UNITS
Stone Arch Village Senior Housing	33	Senior	MTW PBV — ALL UNITS
Stone Arch Village Family Housing	24	Family	MTW PBV — ALL UNITS
Brookbend East	40	Family	Multifamily Section 8/ MTW PBV — 11 UNITS
Brookbend West	35	Family	Multifamily Section 8/ MTW PBV — 10 UNITS
Affordable Housing Preservation Program			
Meadow Road	18	Family	MTW PBV — ALL UNITS (June 2015)
Special Programs – Cheshire Housing Opportunities & Shelters			
Ash Brook	24	Family	
Fairweather Lodge	6	Chronically mentally ill	
Cottage Street	3	Family	MTW PBV — ALL UNITS
Water Street Family Shelter	1	Homeless	MTW THASP
139 Roxbury Street Shelter	1	Homeless	MTW THASP
Total Units	551		

Other Changes to the Housing Stock Anticipated During the Fiscal Year

KH does not anticipate any other changes to our housing stock in FY2015.

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

In July 2014 KH entered a THASP agreement with Monadnock Center for Violence Prevention (MCVP) to provide shallow subsidies to victims fleeing domestic violence and sexual abuse living in MCVP's transitional shelter. KH is expecting that nearly all THASP supported shelter beds will be filled during the year, accounting for an increase in households served through our non-traditional subsidy programs.

In addition, KH is converting Meadow Road to PBVs through our Affordable Housing Preservation activity in 2015, this will add an additional 18 households to our MTW program. Finally, after careful consideration, we have decided to convert 3 units to MTW PBVs at Evergreen Knoll, a Rural Development property.

Table 2. Anticipated number of households served in FY2015.

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	47	563
Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	64	768
Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	111	1331

* 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 FY2015.

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

WAIT LIST INFORMATION

KH made several changes to our waiting list policies in 2013 and 2014 that have reduced our waiting list times and streamlined administration.

The first policy change created a Mobility Waiting List for residents of our PBV units. The Mobility Waiting List is administered at a 6:1 ratio, with every sixth tenant-based voucher being offered to an existing KH PBV resident who has lived in a PBV unit for at least 2 years and indicated an interest in a mobile voucher. This change provided greater mobility and housing choice to PBV tenants, while uncluttering the HCV waiting list with households already assisted in PBV units.

The second change removes a household that receives a NED or Mainstream voucher from all other voucher waiting lists, instead of only the list from which their Special Project Voucher (SPV) was issued.

Prior to these policy changes, households who entered our PBV or HCV programs were allowed to remain on all tenant-based HCV waiting lists, this included those issued a NED or Mainstream voucher. As applicants are permitted to apply for any waiting list upon application, this policy filled the waiting lists with households either already receiving assistance, or in the process of being assisted, making it difficult to serve those still in need and making it difficult to determine need. It also was difficult to effectively administer the waiting lists or manage our properties and programs, as we sometimes spent more time moving existing households from one program to another rather than bringing in new households in need.

The two policy changes reduced our HCV waiting list time by three (3) years and ensures that KH is prioritizing households still in need over those already being served. As both policy changes were not in full effect all of FY2014, we anticipate additional administrative corrections may be necessary in 2015 to ensure that the waiting list changes are easy for staff to administer and for applicants to understand.

Table 3. Projected Number of Wait List Applicants for FY2015 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	Community-Wide	408	Open	N/A
Federal MTW HCV Units	Program Specific (NED)	155	Open	N/A
Federal Non-MTW HCV Units	Program Specific (Mainstream)	229	Open	N/A
Federal MTW PBV Units	Site-based (Unduplicated)	624	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.

N/A

If Local, Non-Traditional Housing Program, please describe:

N/A

If Other Wait List Type, please describe:

N/A

III. PROPOSED MTW ACTIVITIES

2015.01.CE AFFORDABLE HOUSING PRESERVATION PROGRAM (AHPP) - RENT REFORM

Activity Description

Throughout the country, owners of PBRA properties are opting out of their expiring contracts. There are typically two primary reasons for opt-outs: income and regulations. Converting affordable properties to market rate provides higher returns on owner investment without the administrative burden that comes with managing a HUD assisted property. By converting affordable housing units from PBRA to project based vouchers the Affordable Housing Preservation Program (AHPP, page 29) may address owner's income in cases where the PBV rents exceed PBRA rents. However, it does little to substantially resolve the administrative burden issue.

The AHPP Rent Reform initiative provides administrative relief to participating owners by simplifying the recertification and rent calculation process. These reforms will lower administrative costs which will provide further incentives for owners considering opting-out of their PBRA HAP contract to keep their units affordable via AHPP. As in the traditional PBV program, subsidy will be calculated based upon 30% of a household's adjusted annual income. However, the activity alters the current methodology for calculating rent and recertification schedule with the following streamlined strategies:

- Establish a triennial recertification schedule for all households.
- Limit interim recertifications 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.
- Apply the Utility Allowance in effect at the effective date of the last regular recertification to calculate rents at interim recertifications.
- Disregard household assets in the calculation of annual household income and tenant rent if the value of the total net assets is \$50,000 or less.
- Eliminate the Earned Income Disregard (EID).

In addition, this policy allows participant households the opportunity to increase earnings and establish and increase 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 has positive outcomes for households.

Under the Stepped Subsidy program, many households maintain stable employment longer than workable households not in the program². Research correlates long-term employment with wage growth and successful transition out of public assistance³. Higher wages result in households transitioning into self-sufficiency faster than households who are unable to maintain steady employment. For example, Stepped Subsidy residents stay with KH, on average, 2 to 5 years as opposed to 5 or more nationally⁴.

2 Keene Housing FY2014 MTW Annual Report. Forthcoming

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

4 HUD. 2014. *Resident Characteristics Report April 2013 through July 2014*. <https://hudapps.hud.gov>

Activity Metrics Information

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$2326	\$2088		
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	99	87		
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease).	0	0		
SS #1: Increase in Household Income				
Average earned income of households affected by this policy (increase).	\$9865	\$9964		
SS #2: Increase in Household Savings				
Average amount of savings/escrow of households affected by this policy (increase).	\$15,777	\$15,935		
SS #3: Increase in Positive Outcomes in Employment Status				
Number of Head of Households that are:				
(1) Employed Full-time	5	7		
(2) Employed Part-time	3	2		
(3) Enrolled in an Educational Program	0	1		
(4) Enrolled in a Job Training Program	1	1		
(5) Unemployed	2	0		
(6) Other	0	0		
Percentage of total Work-able Households that are:				
(1) Employed Full-time	45%	64%		
(2) Employed Part-time	27%	18%		
(3) Enrolled in an Educational Program	0%	9%		
(4) Enrolled in a Job Training Program	10%	9%		
(5) Unemployed	18%	0%		
(6) Other	0%	0%		
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Number of households receiving TANF assistance (decrease).	1	0		
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase).	0	2		

*Baselines calculated using actual number of recertifications/interims done at Meadow Road FY2014.

Need/Justification for MTW Flexibility

The changes to the recertification schedule, interim requirements, and Utility Allowance calculation utilize the flexibilities described in Attachment C Section D(1)c which authorizes KH to “define, adopt, and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations”. Specifically, the policy waives the requirements outlined in CFR 982.516(a) which requires KH to “conduct a reexamination of family income and composition at least annually”; CFR 982.516(b) which outlines interim requirements, including when an interim is conducted (Section (b)1) and requirements for adjusting housing assistance payments during interims (Section (d)2).

Establishing a \$50,000 asset threshold when determining household income utilizes flexibilities found in Attachment C Section D.2(a) Rent Policies and Term Limits which permits KH to “adopt and implement any reasonable policies to calculate the tenant portion of the rent”.

As households are eligible for interims when their income drops by \$50 or more a month and increases in income do not change the tenant rent between recertifications, which happen every three years, use of EID is no longer necessary or administratively feasible. Eliminating EID for participating households is authorized under Attachment C, Section D.3(a) Eligibility of Participants which permits the agency “to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements of the 1937 Act and its implementing regulations”. Specifically, the policy waives the requirements of CFR 982.201 (3) Eligibility and Targeting which requires PHAs “In determining annual income of a participant family which includes persons with disabilities, the determination must include the disallowance of increase in annual income as provided in 24 CFR 5.617, if applicable.”

Impact Analysis

KH performed an impact analysis on the current residents of Meadow Road, the first property converting from PBRA to PBV under AHPP in mid-2015. Analysis shows that all but one (1) household will see no change in their tenant share. The one household will actually have their TTP decrease by \$8 per month due to the new asset threshold.

KH analyzes all activities, prior to proposal and during the life of an activity, to ensure that no individual or group, including any federal or state protected classes, is disproportionately affected by the activity. KH found that the AHPP Rent Reform activity does not disproportionately affect any single individual or group, regardless of protected status. Please see Appendix I for the complete impact analysis.

Hardship Case Criteria

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

If the 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 precipitated the need for Safety Net. KH has operated Safety Net for 15 years as part of the Stepped Subsidy activity.

Annual Reevaluation of Activity

KH uses an Improvement-Focused model of evaluation to assess all MTW programs annually for program performance and to confirm statutory compliance. KH also monitors household rent burden and number/reasons for Safety Net applications on a quarterly basis.

Transition Period

Transition into this activity corresponds with the transition into the Affordable Housing Preservation Program.

2015.02.CE AFFORDABLE HOUSING PRESERVATION PROGRAM (AHPP) –

ALTERNATIVE INSPECTION SCHEDULE

Activity Description

To further streamline administration of properties participating in the AHPP (page 29), KH is establishing an alternative schedule for Housing Quality Standards (HQS) inspections. This policy adopts a biennial inspection schedule and alternate inspection protocols similar to KH's HQS Biennial Inspection Schedule (page 31) and HQS Alternative Inspection Protocol (page 32) activities with the following stipulations and modifications:

- All units converting to AHPP must be inspected by the administering PHA for HQS compliance no more than 30 days before initial conversion.
- Should all units pass initial inspection, the property is subject to biennial HQS inspections of 20% of the property's units.
- Should any unit fail initial or any other inspection, the property is subject to an annual inspection of 100% of the property's units until all units 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 the higher inspection protocol.
- A household may at any time request an HQS inspection from the administering PHA should the tenant believe their unit does not meet HQS.

Activity Metrics Information

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$374	83		
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	18	4		
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease).	0	0		

*Baselines calculated using actual number of units at Meadow Road.

Need/Justification for MTW Flexibility

The modifications outlined in this policy utilize the MTW flexibilities outlined in Attachment C Section D(5) Ability to Certify Housing Quality Standards. Specifically KH waived CFR 982.405(a) PHA Initial and Periodic Unit Inspection (as modified by 79 FR 35940) which requires PHAs to inspect a unit leased to a household “at least annually during assisted occupancy”.

Annual Reevaluation of Activity

KH uses an Improvement-Focused model of evaluation to assess all MTW programs annually for program performance and to confirm statutory compliance. KH also monitors the number of household-initiated HQS inspections and properties returning to annual recertification to determine owner HQS compliance.

Transition Period

Transition into this activity corresponds with the transition into the Affordable Housing Preservation Program.

2015.03.CE EARNED INCOME DISREGARD (EID) ELIMINATION

Activity Description

KH will eliminate the Earned Income Disregard (EID) from the calculation of a tenant's share of the rent for participant households. EID allows the income from disabled households returning to work to be disregarded when calculating tenant share for two, 12 month exclusion periods with a lifetime limit of 48 months.

Activity Metrics Information

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$576	\$0		
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	24	0		
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease).	0	0		
CE #5: Increase in Agency Rental Revenue				
Rental revenue in dollars (increase).	\$225,078	\$239,310		

Need/Justification for MTW Flexibility

Eliminating EID will reduce HAP payments in the HCV and PBV programs while reducing administrative cost. EID requires KH to exclude earned income in the calculation of the household's tenant share for elderly and disabled households who move from unemployment to employment. EID results in increasing the federal contribution to housing assistance by calculating the household's tenant share by a lower amount than households that were employed upon entering the program.

Tracking for EID is also extremely burdensome. EID participants often are unable to maintain steady employment, this results in an increase in interim recertifications compared to non-EID households. Currently, KH administers EID benefits for five (5) households who average three (3) interims per year compared to the rest of the Elderly/Disabled population who average one (1) interim per year.

This activity is authorized under Attachment C, Section D.3(a) Eligibility of Participants which permits the agency "to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements of the 1937 Act and its implementing regulations". The activity would specifically waive the requirements of CFR 982.201 (3) Eligibility and Targeting which requires PHAs "In determining annual income of a participant family which includes persons with

disabilities, the determination must include the disallowance of increase in annual income as provided in 24 CFR 5.617, if applicable.”

Impact Analysis

KH will allow households currently receiving the EID to continue doing so until the naturally occurring expiration of their 48 months under the current program, but will not enroll new households in EID. Therefore there will be no impact on the households currently enrolled.

Hardship Case Criteria

Although there is no anticipation of this initiative creating a hardship for MTW participants, 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.

Annual Reevaluation of Activity

KH uses an Improvement-Focused model of evaluation to assess all MTW programs annually for program performance and to confirm statutory compliance. KH also monitors household rent burden and number/reasons for Safety Net applications on a quarterly basis.

Transition Period

As existing households will be allowed to retain their EID benefits until the naturally occurring end of their 48 months, KH will not require a transition period to initiate this activity.

IV. APPROVED MTW ACTIVITIES

As one of the nation's first MTW agencies, KH has seen significant changes in our MTW reporting requirements over the past fourteen years. Conversations with stakeholders indicated that the current organization of some of our initiatives, particularly the older ones, makes it difficult for individuals and organizations to fully identify the MTW flexibilities being used and each MTW activity's outcome.

More importantly, by lumping multiple undertakings into one activity it can be difficult to determine if the entire activity or individual pieces are contributing to the outcomes we see. This marks KH's first Annual Plan using the revised Attachment B. For the purpose of greater transparency and ease in showing program efficacy, KH is taking the opportunity the new Plan format provides us to reorganize our activities so that they are easier to understand and track. The reorganization allows us to provide a clearer and more accurate picture of what we are doing with our MTW flexibility and report the actual impact the individual pieces of our MTW program have on meeting the program's statutory obligations. See Appendix II for a breakdown of the original activities (based upon the FY2014 Plan) and their new designation.

Methodology for Restructuring

KH reviewed each activity to determine which aspects of program administration the activity affected and what specific CFR under the MTW waiver we utilized. If an activity affected more than one aspect of program administration and/or individual parts of an activity used a different CFR waiver (under the same MTW authorization) then that portion of the activity was broken out into its own activity. KH is proposing no other changes to the restructured activities nor require any additional MTW waiver authority in this reorganization.

Activity Numbering System

Consistent with the numbering system adopted in 2014, activities utilize the Plan approval year for the first section of the activity number. The Plan year chosen is the year in which that portion of the activity was approved. In some cases these "new" activities were added to the original activity in a subsequent Plan Year, in these cases the numbering reflects the actual approval date of that portion of the original activity. For example, the Eligibility Administration and Homeownership activity has now been reorganized into two (2) activities – Eligibility Administration Guidelines and MTW Homeownership Flat Subsidy. While the original activity was approved in 1999, the Homeownership portion of that activity was not added until 2008. Therefore Eligibility Administration uses the original Plan year while the MTW Homeownership Flat Subsidy uses 2008 as its Plan approval year.

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 may fall under more than one objective, KH's primary goal in initiating the activity is used.

IMPLEMENTED ACTIVITIES

1999.01.HC Eligibility Administration Guidelines (Formerly Eligibility Administration and Homeownership)

Year Implemented: 2000

KH's MTW HCV program income eligibility threshold was increased to 80% of Area Median Income (AMI) as part of its original MTW agreement. This expanded the number of programs available to low-income households by targeting households up to 80% AMI.

In addition, Keene Housing established a \$100,000 asset threshold to its MTW program's eligibility guidelines in 2014. When determining eligibility, KH calculates anticipated income by applying all applicable income sources as described at 24 CFR 5.609. If the calculated income is 80% AMI or less, KH applies the asset threshold 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.

This 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 FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Eligibility Administration and Homeownership activity, KH proposes to utilize the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

2008.03.HC MTW Homeownership Flat Subsidy (Formerly part of the Eligibility Administration and Homeownership Activity)

Year Implemented: 2009

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

located and a lender secured. To avoid penalizing homeownership participants who increased their income above 80% AMI while in the process of finding a home, Keene Housing initiated, upon HUD approval of our FY2008 Annual Plan, a flat subsidy for families in the Homeownership Program with incomes between 80% AMI and 140% AMI.

KH also applies the flat subsidy and 140% AMI ceiling to households after closing. Under the traditional HUD homeownership program, a non-elderly, non-disabled (work-able) household may receive assistance for up to 15 years on a 20 year or longer mortgage (10 years for a shorter mortgage). This assistance continues regardless of income after the initial income eligibility determination. By utilizing both an income guideline and HUD's standard term limits, KH promotes participants' efforts to increase financial stability while holding the household to a higher standard than HUD's traditional homeownership program. With the economic and housing market instability in 2008, Keene Housing initiated a policy change that permitted homeownership families to request interims if their incomes changed. This policy change prevented at least two foreclosures and remains in place.

No new Homeowner Vouchers were issued to date in 2014. Participation remains level at 7 households. It is noteworthy, however, that even with our assistance; it is very difficult for low-income families to afford the costs of purchasing and maintaining a home.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Eligibility Administration and Homeownership activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

1999.02.CE Housing Quality Standards (HQS) Landlord Self-certification Inspection Protocol (Formerly Part of the Housing Quality Standards Inspection activity)

Year Implemented: 2000

This activity permits participating property owners to self-certify HQS compliance, after the initial KH HQS inspection, with KH performing quality control inspections on randomly selected owner certified units. Additionally, participants can request a special inspection anytime they believe their unit violates HQS. Units that fail a biennial, quality control, or tenant requested inspection return to a KH administered annual inspection schedule until the unit receives a 'Pass' status.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the HQS Inspection activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

1999.03.CE Rent Reasonableness Neighborhood Analysis Discontinuance

Year Implemented: 2000

Under the traditional HCV program, PHAs are required to develop and maintain a database of rental units in the PHA's jurisdiction. The development of this database often requires extensive administrative hours surveying existing rental units based on unit size, neighborhood, and amenities provided. While maintenance must be completed on at least an annual basis to provide updates based on HUD's release of fair Market Rents for the area. KH found that the annual maintenance of this data tended to be administratively demanding with very little return as the region's rental market is incredibly tight with little variance from neighborhood to neighborhood or town to town. As it is KH's belief that the household, not KH, is the best judge of what an appropriate rent is (see 40% Affordability Elimination activity on page 25) KH determined that the annual neighborhood analysis for rent reasonableness in 2000 as part of its MTW HCV program in its original MTW Agreement executed in 1999.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Rent Reasonableness activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks are recalculated to report on only this portion of the original activity.

1999.07.HC Reasonable Rent Determination Discontinuance

Year Implemented: 2000

Based upon the region's housing market, economic environment, and the rural nature of much of the area, KH believes that the determination of a rent's reasonableness should be the household's decision according to the household's priorities, income, and needs. For this reason, KH does not test any unit for rent reasonableness for participants nor negotiate rents or hold a contract with owners.

During the issuance briefing, 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. The education and support provided by KH continues throughout the applicant's housing search and during their rent negotiations with prospective owners.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Rent Reasonableness activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

1999.08.HC 40% Affordability Discontinuance

Year Implemented: 2000

KH believes the best judge of what a household's priorities are in relation to housing is a well-informed, educated household. In our original Plan, KH eliminated the 40% affordability rule for its MTW programs. Instead households 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 household's proposed rent burden and if it exceeds 40%, KH allows the household the opportunity to demonstrate that they can manage the higher rent burden. Households who choose a high rent burden are not eligible for Safety Net unless a change in circumstances causes their rent burden to exceed their rent burden at lease-up.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Rent Reasonableness activity, KH proposes to utilize the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

1999.04.CE Stepped Subsidy Rent Reform

Year Implemented: 2000

The Stepped Subsidy activity introduced a three (3) stepped subsidy structure for all work-able and interested elderly/disabled families. All households receiving assistance under Stepped Subsidy are required to participate in the Resident Self-Reliance Program. Rather than charging residents 30% of adjusted income for rent, residents pay only 20% of gross income towards rent in the first two years.

The subsidy is then reduced at Year 3 – to 65% of Voucher Payment Standard (VPS) – and Year 4 – to 45% of VPS (see table below).

Table 4. 2015 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

In 2013 alone, Keene Housing has helped 15 stepped subsidy families move out of housing assistance and into self-sufficiency. Between 110 and 130 households typically participate in the Stepped Subsidy and Resident Self-Reliance programs.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

Any changes to metrics or baselines for this activity will be outlined in the FY2015 Report.

2013.01.SS \$0 HAP Rent Burden Test

Year Implemented: 2013

In FY2013, Keene implemented a rent burden test to measure a family’s progress towards economic independence. When a Stepped Subsidy household’s gross rent burden is at or below 30% of their gross income, KH reduces HAP to \$0 for 6 months. If the household does not experience an unanticipated change in income within the \$0 HAP period, housing assistance is terminated. This change helped better align the metrics for measuring self-sufficiency with those used for hardship in the Safety Net program.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

While this activity was originally a part of the Stepped Subsidy activity, it does little to promote cost efficiencies. This activity more closely aligns with the Self-Sufficiency objective. KH will utilize the following metric to evaluate this activity.

	Baseline	Benchmark	Outcome	Benchmark Achieved?
SS #8: Households Transitioned to Self-Sufficiency				
Number of Households transitioned into self sufficiency (increase).	1	2		

1999.05.SS Resident Self-Reliance (RSR) Program

Year Implemented: 2000

The RSR program provides service coordination and case management to help families become financially stable. The program is required for all non-elderly, non-disabled households enrolled in the Stepped Subsidy program. Elderly and Disabled households that elect to enroll in the Stepped Subsidy program are also required to participate in the program. The program serves approximately 100 households per year.

Upon issuance, RSR participants complete an assessment to determine potential barriers to self-sufficiency and financial stability based upon the following five (5) Foundational Proficiencies:

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

Individualized Goal Setting Plans

Within 30 days of lease-up, new participants meet with a Resident Service Coordinator (RSC) for an assessment session. The assessment session helps identify the Foundational Proficiencies in which the household needs the most support. The assessment meeting is followed by a goal-setting session where participants develop an individualized 3-year plan to attain competencies in the areas identified. The plan includes specific goals and milestones with dates for completion. Participants are encouraged to consider and set goals to mitigate increases in the participant's tenant share predicted by enrollment in the Stepped Subsidy activity.

All households are required to have an active 3-year plan as long as they are receiving housing assistance through the Stepped Subsidy program. Upon completion of a 3-year Goal Action Plan, the participant and RSC establish a new 3-year plan.

Development Grants and Rent Credits

Keene Housing understands that cost is often a major barrier to low-income households' success. In an effort to provide the best chance for our participants to reach their goals, Keene Housing offers Development Grants to help offset costs associated with attaining goals within a household's 3-year Goal Action Plan. The grant fund is renewed annually with the amount of the grant determined by funding availability. Examples of Development Grant approved uses include help with tuition, textbooks, exams, and even childcare.

In addition, participants can choose use their Development Grant funds for Rent Credits they meet an established milestone or goal. The amount of the Rent Credit varies dependent upon the significance of a participant's achievement and the amount of funds left in the household's annual Development Grant fund.

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

Participant Compliance

KH requires RSR participants to attend quarterly one-on-one RSC progress meetings. Participants who miss three (3) progress meetings with their RSC are terminated from the RSR and Stepped Subsidy programs. In addition to the quarterly meetings, participants are encouraged to join monthly round table sessions which revolve around trainings, guest speakers, and discussion relevant to a specific Foundational Proficiency.

KH stopped approving new programmatic waivers from RSR, including the 5-year participation requirement, in 2014. Participants that received an RSR programmatic waiver prior to implementation of this policy revision may keep their waiver. However, KH can require the household to reenter the RSR program if the household applies for hardship through Safety Net or is non-compliant with their lease or Obligations of the Family.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH is now counting households that transition to self-sufficiency due to economic self-sufficiency under the \$0 HAP Threshold activity, the baselines for this metric in the RSR activity will be the following:

	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>SS #8: Households Transitioned to Self-Sufficiency</i>				
Number of Households transitioned into self sufficiency (increase).	14	10		

1999.06.HC Transitional Housing Assistance Shelter Program (THASP) (Formerly Shelter Housing Assistance Coupon)

Year Implemented: 2000

Keene Housing began providing shallow subsidies to local service provider partners for shelter and transitional housing as part of its original MTW agreement. The program focuses on homeless and hard-to-house populations by working together with local service providers who provide both shelter and case management to help homeless individuals find stable housing.

KH provides shallow subsidies for 4 transitional housing programs – Roxbury Street Men’s Shelter, Water Street Family Shelter, Second Chance for Success, and Fairweather Lodge. The first shelter, Roxbury Street Men’s Shelter, came under contract in September, 2001 and is managed by Southwestern Community Services (SCS), a local Tri-Cap agency. In 2014 KH expanded the program again and now provides shallow subsidies to the Monadnock Center for Violence Prevention (MCVP) to support their shelter for victims of domestic violence and sexual assault.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

Any changes to metrics or baselines for this activity will be outlined in the FY2015 Report.

2005.01.CE Elderly and Disabled Household Alternative Recertification Schedule (Formerly part of the Alternative Recertification activity)

Year Implemented: 2005

Keene Housing does not require 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 to participate in the annual recertification process. Instead KH relies on the published Cost of Living Adjustment (COLA) and Enterprise Income Verification (EIV) system to calculate each household’s income. KH notifies households via mail of their new tenant share and subsidy amount. Included with this notice is the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). Households with pension and assets above \$50,000 continue to participate in the regular full annual recertification process.

Keene Housing understands the value of regular contact with HCV participants, particularly elderly and disabled participants, yet the recertification process for many elderly and disabled households can be quite confusing and stressful to them. To maintain contact with participants in a more productive manner, Keene Housing created an annual Wellness Response system. The Wellness Response provides

referrals to community partners for households needing assistance outside of housing.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Alternative Recertification activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

2005.02.CE Stepped Subsidy Recertification Schedule

Year Implemented: 2005

Households participating in the Stepped Subsidy program currently participate in a recertification at each step change.

Upon reaching Step 3, participating households are no longer subject to full recertifications. Instead, KH conducts Enterprise Income Verification (EIV) systems check at least annually on all households to test if the family has met the \$0 HAP threshold and for processing recertifications. As all Stepped Subsidy households also participate in RSR and are required to attend quarterly meetings with their RSC, income and employment data is collected quarterly. This data is used to ensure program eligibility and to measure each household's progress towards their 3-Year Goal Action Plan. In addition, RSCs collect new Authorization for Release of Information/Privacy Act Notice (HUD form 9886) when the existing 9886 is expiring.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

As this activity was originally a part of the Alternative Recertification activity, KH proposes utilizing the same metrics and baselines first described in the FY2013 Report. To accommodate the reorganization of the activity, baselines and benchmarks will be recalculated in the FY2015 Report to report on only this portion of the original activity.

2008.01.HC Project-based Voucher Program (formerly Project-Based Coupons)

Year Implemented: 2008

KH continues to run its local Project Based Voucher (PBV) program, initially approved in 2008. This activity permits Keene Housing to waive regulatory caps on the total HCV inventory KH may project

base. 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 utilizes this activity to waive the required public process for project-basing units within KH owned and managed properties as well as the limitations on the percentage of units within a property that may be project-based.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2008.02.CE Restrictions on Section 8 Portability

Year Implemented: 2008

Since 2009, KH restricts households from porting out of our jurisdiction to those households who provide demonstrable need for a reasonable accommodation, are the victim of domestic violence, or for RSR participants who can show that such a move would demonstrably increase their financial stability, such as a new employment or educational opportunity.

Changes Proposed for FY2015

KH will no longer apply this activity to elderly/disabled households with a MTW HCV or NED voucher.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

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

Year Implemented: 2011

The approval of the FY2011 MTW Plan gave Keene Housing the ability to change the annual Housing Quality Standards (HQS) inspection requirement to a biennial HQS inspection schedule for units meeting HQS compliance at the initial or annual inspection conducted in 2011, including KH-owned and managed properties. 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 FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2013.01.CE Housing Quality Standards (HQS) Alternative Inspection Protocol

Year Implemented: 2013

In FY2013 Keene Housing was authorized to discontinue HQS inspections in units held to a stricter inspection protocol – REAC/UPCS, State Finance Authority, etc. If a property is inspected under a stricter alternative inspection method, and the property receives a “pass” score, KH relies on that inspection to demonstrate compliance with the property’s biennial HQS inspection requirement.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2014.01.HC Affordable Housing Preservation Program (AHPP)

Year Implemented: 2015

KH proposed and received approval for our Affordable Housing Preservation Program in our FY2014 Plan. Building on the successes of similar initiatives at other MTW Agencies, the program more effectively uses the subsidy provided by the Enhanced Voucher program (Section 8(t) of the U.S. Housing Act) to preserve properties that would otherwise either continue to suffer from inadequate funding, or convert to market rate.

It does this by providing property owners the option to opt-out of an expiring PBRA contract and convert to a PBV HAP contract with KH. As vouchers often provide higher payments than older PBRA contracts, entering into a PBV HAP contract can provide owners access to additional rental revenue and new potential funding opportunities for capital improvements. KH then provides residents the option of remaining in place and converting their voucher to a PBV or taking their Enhanced Voucher to the private market at which time KH will provide a PBV for the unit.

KH chose Meadow Road, a KH owned Multi-family Section 8 property, as the first property to convert under this new initiative. Regulations stipulate that owners provide their tenants one (1) year notice of their decision to opt-out of their existing Housing Assistance Payment contract. This stipulation, in conjunction with delays in the FY2014 Plan approval process, meant that KH did not begin the notification and education process until mid-2014. Initial outreach meetings have shown most residents are excited about the conversion and would prefer to remain in place. Anticipation of the conversion allowed KH to apply for and win Community Development Block Grant (CDBG) funds which have been directed towards much needed capital improvements to the property. Meadow Road’s PBV conversion is expected to take place in June 2015.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2014.02.CE Medical Deduction Threshold

Year Implemented: 2014

Under the traditional medical deduction calculation, households may claim unreimbursed medical expenses up to 3% of their annual income as a deduction towards their adjusted annual income calculation. Keene Housing found that most households either did not need the exclusion or were using the exclusion to pay for additional private insurance which would no longer be necessary with the implementation of the Affordable Care Act (ACA). To streamline the recertification process and reduce the amount of federal housing subsidy going to personal insurance, KH increased the threshold for medical deductions to 7.5% for elderly and disabled households' unreimbursed medical expenses.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2014.02.SS Asset Exclusion Threshold

Year Implemented: 2014

In FY2014, KH adopted a policy to disregard net assets that total \$50,000 or less from the income calculation when determining a participant's tenant portion of the rent. This policy allowed residents the opportunity to establish and increase assets without being discouraged by a corresponding increase in rent. KH continues calculating imputed value for all assets in the income calculation when a household's total net assets exceed \$50,000.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2014.04.SS Keene Housing Kids Collaborative (KHKC)

Year Implemented: 2014

For many years Keene Housing operated a relatively small after school and summer program for children living in KH's Forest View and North and Gilsum properties, Building Bridges. Even with a small budget, relatively simple curriculum, and small staff the kids who participating in Building Bridges flourish. Through the Use of Funds authority provided through MTW, Keene Housing created a 501(c)(3) non-profit organization in 2014 that offers wrap-around services to all children living in KH- and KH- affiliate owned and managed properties (all of whom are below 80% AMI), not just those living in units supported through KH's MTW PBV and HCV programs.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

2014.03.HC Affordable Housing Preservation & Modernization Program

Year Implemented: 2014

In spring of 2014, Keene Housing completed a six-month effort of compiling and aggregating the projected capital needs of the entire KH- and KH-affiliate owned portfolio through 2018. The results were sobering. KH's portfolio will require almost \$3.8M in modernization over the next three and a half years.

In the amended FY2014 Plan, KH created the Affordable Housing Preservation and Modernization Program to address these capital needs. The activity allows KH to address the KH- and KH-affiliate owned portfolio's growing capital 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.

Changes Proposed for FY2015

KH proposes no changes to this activity.

Metrics Changes for FY2015

KH will outline any changes to metrics or baselines for this activity in the FY2015 Report.

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

Year Implemented: 2012

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 resulted in KH being unable to determine the impact of this activity until 2012. Analysis showed that the loss in HAP funds due to households receiving a medical deduction they may 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 2015 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 2015 by Financial Data Schedule (FDS) line item, as required by new HUD guidance on MTW Plans and Reports. Since HUD’s FY2015 funding levels have yet to be established, the following estimates assumes no additional proration in HUD funding.

Table5. FY2015 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	\$5,102,313.00
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	\$5,102,313.00

ESTIMATED USE OF MTW FUNDING FOR THE FISCAL YEAR

The next table summarizes estimated MTW expenditures of funds for 2015 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 in greater detail in the Single Fund Flexibility section.

Table 6. FY2015 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	\$469,062.00
91300+91310+92000	Management Fee Expense	\$ 0.00
91810	Allocated Overhead	\$ 0.00
92500 (92100+92200+92300+92400)	Total Tenant Services	\$199,224.00
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	\$4,209,370.00
97400	Depreciation Expense	\$1,000.00
97500+97600+97700+97800	All Other Expenses	\$ 0.00
90000	Total Expenses	\$4,880,656.00

SINGLE FUND FLEXIBILITY

KH maintains a MTW Block Grant Fund to support an array of activities to support low-income housing services and programs focused on promoting self-sufficiency, affordable housing preservation, homelessness and violence prevention services, and youth services. In FY2014, KH adopted the First Amendment to the Amended and Restated MTW Agreement. This amendment allows KH to exercise its authority to utilize MTW funds and project cash flow among projects and programs that may not fall completely under the traditional HCV model but the agency determines best meets our strategic objectives.

KH plans to use MTW Block Grant funding flexibility towards affordable housing preservation through its Affordable Housing Preservation and Modernization Fund activity and expansion of youth services through the Kids Housing Kids Collaborative activity with an estimated MTW Block Grant contribution of \$221,657 in FY2015.

In addition, KH anticipates significant underfunding of its Non-Elderly Disabled (NED) program again in FY2015. As in FY2013 and FY2014, KH expects to cover this shortfall with MTW funds in anticipation of set aside funding in 2015. KH respectfully reminds the Department that this is not a sustainable

model as using MTW funds to support NED short funding diminishes KH's ability to implement board and HUD approved MTW activities.

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.

VI. ADMINISTRATIVE

PUBLIC NOTICE

Keene Housing (KH) invites the community-at-large to review and provide comments regarding the Keene Housing DRAFT Moving to Work (MTW) Annual Plan for FY2015. The DRAFT FY2015 MTW Annual Plan includes three proposed new initiatives. The public comment period is open from 8:30 am on Thursday, August 28, 2014 until 4:30 pm on Monday, September 29, 2014. KH welcomes written comments received at our Administrative Office during the public comment period.

Keene Housing will hold six (6) public hearings prior to finalizing its FY2015 Moving to Work Annual Plan. All meetings will occur at the Community Room/FAC of KH-owned or managed property's unless otherwise noted.

Thursday, September 4th @ 12:00 pm — Central Square Terrace

Tuesday, September 9th @ 5:30 pm — Cutler Elementary School

Tuesday, September 16th @ 12:00 pm — Harper Acres Mill Building

Wednesday, September 17th @ 5:30 pm — ForestView

Tuesday, September 23rd @ 5:30 pm — North & Gilsum

Thursday, September 25th @ 5:30 pm — KH Central Office

A copy of the DRAFT MTW Plan is available for review at our Administrative Office located at 831 Court Street, Keene, starting from August 28th until September 29th 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, Special Assistant to the Executive Director, at (603) 352-6161 or abuzby@keenehousing.org.

Total Attendees: 30

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.

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

Attachment B

Certifications of Compliance

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

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 01/01/2015, 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

20-15-14
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.

**Extract of the Minutes of the Regular Meeting of the
Keene Housing Board of Commissioners
October 14, 2014**

Members Present: Lee Robator, Chairperson
Tom Moses, Commissioner
Pam Slack, Commissioner

Also Present: Joshua Meehan, Secretary
Linda Griffin, Director of Finance
Amy Wright, Director of Human Resources
April Buzby, Special Assistant to the Executive Director
Mari Brunner, Policy and Sustainability Intern

Resolution 505 – Approval of Fiscal Year 2015 Moving to Work Annual Plan

RESOLVED, that the Keene Housing Board of Commissioners approve and adopt the Keene Housing Fiscal Year 2015 Annual Moving to Work Plan; and further authorizes the Executive Director to make any technical corrections necessary pursuant to the memorandum dated October 9, 2014 from April A. Buzby, Special Assistant to the Executive Director, to Joshua Meehan, Executive Director.

Motion to adopt: Ms. Slack

Motion seconded by: Mr. Moses

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



Joshua Meehan, Executive Director



Date

APPENDIX I: IMPACT ANALYSIS

HH ID	Eld/Dis	Adj Inc	Gross Rent	Current TTP	New Adj Inc	New Gross Rent (VPS)	New TTP	TTP Change
17586	N	16824	1166	348	16824	1287	348	0
16096	N	3564	1166	16	3564	1287	16	0
1032	Y	8444	1043	137	8444	1067	137	0
20767	Y	34875	1043	798	34875	1067	798	0
19573	N	14690	1043	293	14688	1067	293	0
21217	Y	30591	1043	691	30592	1067	691	0
16980	N	19530	1166	415	19202	1287	407	-8
393	N	20517	1166	440	20517	1287	440	0
17571	Y	31963	1043	725	31963	1067	725	0
21590	N	2868	1043	219	2868	1067	219	0
15342	Y	8360	1043	135	8360	1067	135	0
18552	N	16028	1043	327	16028	1067	327	0
13557	Y	11420	1166	213	11420	1287	213	0
21586	N	22275	1166	484	22273	1287	484	0
19704	N	6180	1166	82	6180	1287	82	0
15936	N	19360	1166	411	19360	1287	411	0
18875	Y	29942	1043	675	29942	1067	675	0
18736	Y	20624	1043	442	20624	1067	442	0

APPENDIX II: MTW ACTIVITIES

2014 MTW Activity #	2014 MTW Activity Name	Year Approved	2015 MTW Activity #	2015 MTW Activity Name	Year Approved
1999.01.HC	Eligibility Administration & Homeownership	1999	1999.01.HC	Eligibility Administration Guidelines	1999
			2008.03.HC	MTW Homeownership Flat Subsidy	2008
			2011.01.CE	Housing Quality Standards (HQS) Biennial Inspection Schedule	2011
1999.02.CE	HQS Inspections	1999	2013.01.CE	Housing Quality Standards (HQS) Alternative Inspection Protocol	2013
			1999.02.CE	Housing Quality Standards (HQS) Landlord Self-certification Inspection Protocol	1999
			1999.03.HC	Rent Reasonableness Neighborhood Analysis Discontinuance	1999
1999.03.CE	Rent Reasonableness	1999	1999.07.HC	Reasonable Rent Determination Discontinuance	1999
			1999.08.HC	40% Affordability Discontinuance	1999
1999.04.CE	Stepped Subsidies (formerly Housing Assistance Coupon)	1999	1999.04.CE	Stepped Subsidy Rent Reform	1999
			2013.01.CE	\$0 HAP Rent Burden Test	2013
1999.05.SS	Resident Self-Reliance (RSR) Program	1999		No Change	
1999.06.HC	Shelter Housing Assistance Coupon Program (THASP)	2000		Rename to THASP; no other change	
2005.01.CE	Alternative Recertification Schedule	2005	2005.01.CE	Elderly and Disabled Household Alternative Recertification Schedule	2005
			2005.02.CE	Stepped Subsidy Recertification Schedule	2005
2006.01.CE	Standard Deductions	2006		<i>Discontinued 2014</i>	
2008.01.HC	Project-Based Coupons	2008		Rename to Project-based Voucher (PBV) Program; no other changes	
2008.02.CE	Restrictions on Section 8 Portability	2008		No Change	
2014.01.HC	Affordable Housing Preservation Initiative	2014		No Change	
2014.02.CE	Medical Deduction Threshold	2014		No Change	
2014.03.CE	Asset Exclusion Threshold	2014		No Change	
2014.04.SS	Keene Housing Kids Collaborative	2014 (amended)		No Change	
2014.05.HC	Affordable Housing Preservation and Modernization Program	2014 (amended)		No Change	
			2015.01.CE	Affordable Housing Preservation Program (AHPP) Rent Reform	2015
			2015.02.CE	Affordable Housing Preservation Program (AHPP) Alternative Inspection Protocol	2015
			2015.03.CE	EID Elimination	2015

APPENDIX III: PUBLIC COMMENT

MTW RELATED COMMENTS

C: One commenters asked for clarification on why KH restricts portability for voucher holders and is changing that policy for elderly and disabled households only.

R: KH provides a significant amount of resources in both time and funds to RSR participants during the first few years they are in the program. These costs are mitigated later in the program as the household becomes more financially secure and therefore needs less assistance. KH believes it is a disservice to both the community and the household to allow participants to leave the area without proper supports to ensure continuing success. This is why we limited port-outs to those that are related to health and safety issues, or have proven financial benefit.

However, we realize that for many of our elderly and disabled participants the restrictions are unwarranted. In many cases requests to move are to help elderly and disabled residents live closer to loved-ones or supportive services outside of our jurisdiction. We believe our elderly and disabled participants should be able to age in a place that meets their needs, even should that mean leaving our area.

C: One commenter expressed opposition to KH’s proposal to go to a triennial recertification schedule in the Affordable Housing Preservation Program (AHPP) - Rent Reform activity. The primary concern expressed was that less recertifications will lead to less accurate household information.

R: The information collected triennially will be no more or less accurate than information gathered weekly, monthly, annually, or biennially. It will simply be collected less frequently than it is under the PBRA program. Further, triennial recertifications do not exempt households from having to report changes in household composition nor do they deny households access to Safety Net.

C: One commenter expressed concern that under the proposed AHPP - Rent Reform activity AHPP participants would be exempt from KH’s current interim policies.

R: Household rent and income in AHPP properties is determined pursuant to policies specific to AHPP, just as HUD’s Project Based Section 8, USDA’s Rural Development, IRS’s Low Income Housing Tax Credit and KH’s Stepped Rent Subsidy and Transitional Housing Assistance Subsidy Programs all have their own (albeit in some cases largely shared) requirements with respect to eligibility, continued participation, rent calculation, and income determination.

All of these programs have shared regulatory ancestry, but KH’s programs are distant relatives of HUD’s traditional programs, rather than their children or brethren. When viewed through this perspective, one should expect that any KH Rent Reform initiative would have its own set of policies, designed to best address whatever challenges – regulatory, administrative, philosophical, financial, etc. – the proposed

reform seeks to address. Just as the Stepped Rent Subsidy program looks nothing like the Housing Choice Voucher program, AHPP looks very different than the Project Based Section 8 program, from which AHPP residents and properties will be transitioning.

C: Several commenters noted that the Safety Net (Hardship) policy in the MTW Administrative Plan does not permit medical expenses as a permissible hardship for Income-based Subsidy households.

R: Safety Net is for any household that experiences a sudden, unexpected increase in rent burden. While the Safety Net policy does not explicitly state medical expenses as permissible cause for such hardship, if medical expenses were the reason for the increase in rent burden, a household may be eligible for Safety Net.

C: One commenter noted that the Interim policy in the MTW Administrative Plan does not permit medical expenses as a permissible hardship for Income-Based Subsidy households.

R: KH thanks the commenter for pointing this out. KH is revising the MTW Administrative Plan to align with the hardship criteria in this Plan.

NON-MTW COMMENTS

C: Several commenters provided both positive and negative feedback about the condition of our properties. Although generally, commenters were pleased with the progress KH has made to improve the grounds keeping at curb appeal throughout the portfolio over the last year, in particular.

R: KH increased its commitment to the appearance of our properties in 2014. With a new vendor in place to handle landscaping and general grounds maintenance, we have turned our attention to safety related issues, such as improved lighting and fencing, and upgrading playground equipment. For 2015 we are looking at a variety of projects that will provide a comfortable outdoor environment for our residents, including additional bike racks to reduce clutter, updating patios and storage units at some of our family sites, and exploring options for increased community gardening spaces.

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

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

C: Commenters at several properties expressed dissatisfaction with the condition of the interiors, particularly problems with flooring, laundry areas, and windows.

R: We are aware that several properties require interior improvements. The Capital Needs Assessment (CNA) we completed in October 2013 allowed us to understand these issues more clearly and in

2014 we completed a five-year Capital Plan that outlines the order and cost of modernization projects throughout the portfolio. As the first part of that Plan we focused on health and safety issues in 2014 by replacing faulty electrical panels and updating accessibility ramps and doorways at several properties. With those complete we will be switching our focus to the more immediate needs of each property including repaving projects and patio and shed replacement projects at North and Gilsum and Forest View in 2015 and 2016.

C: Commenters at Riverbend expressed concerns about water quality at their property and recent notices from the Town of Swanzey on the safety of the water.

R: We are aware that Swanzey's water can cause discomfort, particularly it's hardness and high acidity. All units are equipped with a water filter to help mitigate some of the problems however, there is little else we can do to help as well water is not an option at this time. If residents notice a change in their water, we urge them to place a work order via phone, email, or our website as water filters do need periodic changing.

C: Commenters at several properties provided positive feedback about the addition of on-site office hours for Property Managers and Resident Service Coordinators (RSC) and asked whether it would be possible to increase those hours or have later hours for those who work.

R: We thank the commenters for the positive feedback and are glad they are finding the managers' increased on-site presence a positive change. As we've just begun the new on-site office hours, we intend to keep the hours as they are currently posted for at least several months before considering changing them. However, we are open to suggestions and if we see sufficiently high demand for staff to be on-site more often we will consider the possibility.

C: Commenters at several sites provided positive feedback on the increase in programming for youth both on-site and in the community but cited transportation as a barrier to getting children to the activities, particularly at the Keene YMCA.

R: Thank you for your feedback. We are in the process of looking at ways to make our activities more accessible to all our youth. The City Express is adding a stop at the YMCA to its route soon. This should help those families that live near stops along the route. We are also exploring the possibility of providing transportation to other activities. We are using our partnership with the Keene SAU's Ready! For Kindergarten program as an initial test. If you are looking for transportation to any of the Ready! For Kindergarten sessions in Keene, please contact Anna Crosby at acrosby@keenehousing.org or (603) 313-0236.

C: One commenter at North & Gilsum requested property improvements to make outdoor areas , such as the dumpsters and playground, more accessible for those with limited mobility.

R: Thank you for bringing this issue to our attention. We've asked our Director of Facilities and Assets to meet with residents at North & Gilsum to go over what accessibility improvements are needed

and determine how those improvements can be integrated into the landscaping and repaving plans scheduled for 2015.

C: Commenters at Harper Acres thanked KH staff for changes to the property's smoking policy but mentioned concerns about the location of the smoking areas and condition of the walkway to those areas.

R: We understand that the walkways and curbs at Harper Acres are in need of work. Some of these areas are owned by KH while others belong to the City of Keene. We plan to repave the KH-owned walkways and sidewalks next spring and are working with the City to improve the City's streets and walkways. Please notify your property manager if you see people smoking or disposing of their litter in non-designated area.

C: Commenters at Harper Acres expressed safety concerns as several cars have recently been broken into and requested security cameras.

R: We do not have any plans to install security cameras at Harper Acres at this time. We recommend that residents contact the local police department and notify their property manager about any safety concerns or vehicle break-ins.

C: One commenter asked why KH does not permit residents to install satellite TV, such as Direct TV, on KH property.

R: Unfortunately satellite TV providers, such as Direct TV, require the satellite to be installed on the exterior of a building. The installation provides areas that water, ice, and insects can enter the building and cause extensive damage. Also, as each unit would require its own satellite and satellites are not removed when a tenant moves out, the number of satellites installed on one building could quickly become an eyesore.

C: Commenters at North & Gilsum, Harper Acres, and CST requested more on-site programming for adults, such as exercise and cooking classes.

R: We appreciate that feedback. Over the past year we have concentrated our efforts on building on and off-site programming for children through agreements with various local partners. We will begin working on similar opportunities for adults in response to the comments we received during this year's Listening Tour. We are currently working with the UNH Co-op to provide nutrition and cooking classes at several of our properties. We now offer classes at several site and growing. If anyone is interested in bringing this programming to their property, please contact April Buzby or Carolyn Crane at 603.352.6161. Please look for additional programming on the property bulletin boards, upcoming newsletters, on Facebook, and our website.

C: One commenter mentioned concerns about children being bullied on property playgrounds at North & Gilsum by other tenants and tenants' children.

R: Both KH's leases and the KH Housing Contract are clear that no household member may disrupt the peaceful enjoyment of our properties by others, this includes youth. Residents who are concerned about bullying should discuss the issue with the youth services coordinator, Anna Crosby, their RSC, and/or the property manager to discuss possible resolutions to the situation.