Louisville Metro Housing Authority

Moving to Work Annual Plan

Fiscal Year 2018

July 1, 2017 – June 30, 2018

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I. Introduction

The Louisville Metro Housing Authority, formerly known as the Housing Authority of Louisville, is a nonprofit agency responsible for the development and management of federally assisted housing in the Louisville Metro area. In 2003, Louisville Metro Mayor Jerry Abramson and the Louisville Metro Council approved the merger of the Housing Authority of Louisville and Housing Authority of Jefferson County, thereby creating the Louisville Metro Housing Authority (LMHA). A nine-member Board of Commissioners, appointed by the Metro Mayor, serves as the policy making body of the agency. LMHA has over 4,000 public housing units, and administers rental assistance to approximately 9,400 families through its voucher programs.

Moving To Work (MTW) Demonstration Program Overview

LMHA, then the Housing Authority of Louisville, became one of a small group of public housing agencies participating in the Moving to Work (MTW) Demonstration Program in 1999. The MTW Program, authorized by Congress and signed into Law as part of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, offers public housing agencies (PHAs) the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families. The program allows exemptions from existing low-income public housing (Section 9) and Housing Choice Voucher (Section 8) rules, and it permits LMHA to combine public housing operating and capital funds, along with Housing Choice Voucher rental assistance funds, into a single agency-wide funding source.

Under the MTW Program, LMHA creates and adopts an MTW Annual Plan that describes new and ongoing activities that utilize authority granted to LMHA under its MTW Agreement with HUD. This Plan focuses primarily on the Public Housing, Housing Choice Voucher (HCV), and Capital Fund programs, as these are the LMHA programs that fall under MTW. The Annual Plan also focuses on newly proposed MTW activities and MTW activities that are ongoing. In addition, it contains information about some of LMHA's non-MTW initiatives, such as public housing site improvements, resident self-sufficiency programs, and new or upcoming grant opportunities. The MTW Annual Report - prepared at the end of each Fiscal Year (FY) - is an update on the status and outcomes of those activities included in the MTW Annual Plan.

MTW Objectives

MTW is a demonstration program that allows PHAs to design and test ways to achieve three statutory goals. Each one of LMHA's MTW activities must achieve at least one of these statutory objectives:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to residents, especially families with children, to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

At the inception of LMHA's status as an MTW agency, LMHA carefully evaluated its own goals and objectives against those of the demonstration. The outcome was six long-term goals for LMHA's participation in the MTW program.

Locally Defined LMHA MTW Goals
These goals, as outlined in the FY 1999 Annual MTW Plan, are locally-driven refinements of HUD's objectives:

- Increase the share of residents moving toward self-sufficiency;
- Achieve a greater income mix at LMHA properties;
- Expand the spatial dispersal of assisted housing;
- Improve the quality of the assisted housing stock;
- Reduce and/or reallocate administrative, operational and/or maintenance costs; and
- Enhance the Housing Authority's capacity to plan and deliver effective programs.

Since that time LMHA has recognized a growing number of populations with specific needs that often go unmet by existing housing and support service infrastructure. The agency has revised and updated its goals to reflect changes in the local community and the evolution of the HUD MTW demonstration into a performance-driven program. In addition to the goals above, LMHA has set the goal to:

- Develop programs and housing stock targeted to populations with special needs, especially those families not adequately served elsewhere in the community.

MTW Activity Overview

An MTW activity is defined as any activity LMHA engages in that requires MTW flexibility to waive statutory or regulatory requirements.

LMHA is proposing two new MTW activities for FY 2018:

- Activity #48-2018: Local Project-Based Voucher Program
- Activity #49-2018: Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing

LMHA will also close out one MTW activity during FY 2018:

- Activity #45-2016: MTW Special Referral Program – Coalition for the Homeless "Move Up" Initiative

A complete list of LMHA's MTW activities (along with their current status) follows:

Moving to Work (MTW) Activity Matrix

#	Fiscal Year	MTW Activity	Status
49	2018	Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing	Proposed for FY2018
48	2018	Local Project-Based Voucher Program	Proposed for FY 2018
47	2017	MTW Special Referral Program – ChooseWell Communities	Implemented
46	2017	MTW Special Referral Program – Riverport Scholar House	Implemented
45	2016	MTW Special Referral Program – Coalition for the Homeless "Move Up" Initiative	Implemented; To Be Closed Out in FY2018
44	2015	MTW Special Referral Programs	Implemented
43	2015	HCV Program - HUD/MDRC Rent Reform Demonstration	Implemented
42	2015	MTW Special Referral Program - Centerstone	Implemented
41	2014	Public Housing - Special Occupancy Requirements for Floors 1-9 of Building C at Dosker Manor	Proposed, Not Approved
40	2014	HCV Program - Financial Aid Disregard in Calculation of TTP	Implemented
39	2014	HCV Program - Rent Increase Limit	Implemented
38	2013	MTW Special Referral Program – Parkland Scholar House	Implemented
37	2013, 2014	Public Housing - Sublease Agreement with Frazier Spinal Cord Rehab Institute	Not Approved in 2013, Approved in 2014, Implemented
36	2013	MTW Special Referral Program – Wellspring at Bashford Manor/Newburg	Implemented
35	2012	MTW Special Referral Programs – Allocation of MTW Housing Choice Vouchers	Implemented
34	2012	MTW Special Referral Program – Wellspring at Youngland Avenue	Implemented
33	2012	Public Housing - Rents Set at 30% of Adjusted Income	Closed Out
32	2012	HCV Program & Public Housing - Elimination of the Earned Income Disregard	Implemented
31	2012	MTW Special Referral Program - Stoddard Johnston Scholar House	Implemented
30	2012	MTW Special Referral Program – 100,000 Homes Initiative	Implemented
29	2011, 2015	Public Housing - Sublease Agreement with YouthBuild Louisville	Not Approved in 2011, Approved in 2015, Implemented
28	2011	Public Housing - Locally Defined Guidelines for Development, Maintenance, & Modernization	Not Yet Implemented
27	2011	HCV Program & Public Housing - Deduction of Child-Care Expenses in Determination of Eligibility	Implemented
26	2011	Public Housing - Acquisition of Mixed-Income Sites	Implemented
25	2010	Public Housing - Sublease Agreement with Catholic Charities	On Hold
24	2010	Public Housing - Increased Flat Rents for New Scattered Sites	Closed Out
23	2010	Public Housing - Lease-up Incentives for New Residents at Dosker Manor	Implemented
22	2010	Public Housing - CFL Trade-in Pilot Program for Avenue Plaza Residents	Single Budget Authority Only, Closed Out

#	Fiscal Year	MTW Activity	Status
21	2010	Public Housing - Occupancy Criteria Changes for New Scattered Sites - Mandatory Case Management	Closed Out
20	2010	MTW Special Referral Program - Downtown Family Scholar House	Implemented
19	2010	HCV Homeownership Program - Weatherization and Energy Efficiency Pilot	Single Budget Authority Only, Closed Out
18	2009	Public Housing - Simplification of the Public Housing Development Submittal	Implemented
17	2009	HCV Program & Public Housing - Multicultural Family Assistance Program	Single Budget Authority Only, Implemented
16	2009	Public Housing - Streamlined Demolition and Disposition Application Process for MTW Agencies	Closed Out
15	2009	MTW Special Referral Program - Louisville Scholar House	Implemented
14	2009	Center for Women and Families at the Villager - Determinations for Program Eligibility	Non-MTW
13	2009	HCV Homeownership Program – Exception Payment Standards (Revised 2016)	Implemented
12	2009	HCV Program - Maintenance Specialist	Single Budget Authority Only, Not Yet Implemented
11	2009	HCV Homeownership Program - Flexibility in Third-Party Verifications	Implemented
10	2008	Locally Defined Definition of Elderly	Implemented
9	2007	Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites (Revised 2014, 2016)	To Be Closed Out in FY 2017 Report
8	2008	HCV Program & Public Housing - Standard Medical Deduction	Implemented
7	2008	MTW Special Referral Program - Day Spring (Renewed 2012)	Implemented
6	2008	HCV Program - Earned Income Disregard for Elderly Families	Implemented
5	2007	HCV Program - Spatial Deconstruction of HCV Assisted Units	Closed Out
4	2007	HCV Program & Public Housing - Alternate Year Reexaminations of Elderly and Disabled Families (Revised 2012, 2014)	Implemented
3	2006	HCV Homeownership Program - Amount and Distribution of Homeownership Assistance	Implemented
2	1999	MTW Inspections Protocol	Implemented
1	2005	MTW Special Referral Program - Center for Women and Families	Implemented

Short and Long Term MTW Plan

The mission of the Louisville Metro Housing Authority (LMHA) is to provide quality, affordable housing for those in need, to assist residents in their efforts to achieve financial independence, and to work with the community to strengthen neighborhoods. In implementing these goals, LMHA will, in the **short term**, focus on implementing its MTW Annual Plan. In the **long term**, LMHA will continue to focus on the following initiatives:

Reposition and Redevelop the Conventional Public Housing Stock

The physical stock of the remaining original family developments owned and managed by LMHA needs to be completely redeveloped. These sites – large, dense, urban and often isolated – need major renovation or replacement. LMHA's goal is to transform these communities in the coming years, replacing the current public housing developments with mixed income communities, while at the same time providing replacement units so that the overall number of families served will not decrease. In the elderly developments, modernization efforts will proceed with an eye toward appropriate and expanded service provision. Key initiatives include:

- **Russell Choice Neighborhoods Initiative (Vision Russell)**
  Begun in 2010, the Choice Neighborhoods Initiative (CNI) is a HUD-funded grant program that replaces the HOPE VI Program. There are three types of CNI funding available: **Planning, Action, and Implementation.**

  - **Planning:** LMHA was awarded a $425,000 **Planning** grant in January 2015. The Housing Authority, in collaboration with Louisville Metro Government, residents, and other community stakeholders, created a Transformation Plan for the Russell neighborhood (including the Beecher Terrace public housing development). The final Plan, submitted to HUD in January 2017, focuses on the following goals: transforming Russell into a neighborhood of opportunity and choice; revitalizing Beecher Terrace as part of an overall plan for improving the Russell neighborhood; and attracting investments to Russell to improve quality of life for residents.

  - **Action:** In June 2016, LMHA was awarded $1 million in CNI Action funds, which will be used to complete projects that enhance and accelerate the transformation of the Russell neighborhood. These projects include the creation of neighborhood gateways; construction of smART bus stops; redevelopment of vacant lots; and the revitalization of Sheppard Park. Funds must be expended by December 31, 2017.

  - **Implementation:** LMHA and co-applicant Louisville Metro Government received a $29,575,000 CNI Implementation grant in December 2016, providing critical funding for the transformation of Beecher Terrace and the surrounding Russell neighborhood. The site's current 758 dwelling units will be razed and replaced by a mixed-income, mixed-use community. All 758 units will be replaced either on- or off-site. As new units are completed, displaced residents will have first priority to return either on-site or to off-site replacement housing as long as they were lease-compliant at the time of departure from the original site and remained lease-compliant during the relocation period (No work / income requirements are permitted.).

    During FY 2018, LMHA plans to relocate the residents living in Buildings 51-59, which together contain 121 units, and demolish these structures. This demolition is necessary to make way for the first phase of construction, which will result in a new 120-unit senior

building on the northern half of Old Walnut Park (between 9th Street, 10th Street, Fisk Court, and a new street that has not yet been named).

Off-site in FY 2018, LMHA plans to develop 80-100 Beecher Terrace replacement units either in the Russell neighborhood or in other neighborhoods of opportunity. The Housing Authority's first purchase will be two buildings at 1506-1508 W. Market Street. Together, these two buildings will provide 4 Beecher Terrace replacement units.

Finally, during the fiscal year and in tandem with the revitalization, LMHA will submit one or more disposition application(s) for Beecher Terrace to the HUD Special Applications Center. The Housing Authority is still evaluating whether or not it will be feasible to submit a single application for the entire site, or if separate applications will be needed for each phase of redevelopment.

- **Sheppard Square HOPE VI Revitalization**
  LMHA received a $22 million HOPE VI grant to raze and revitalize the severely distressed Sheppard Square public housing development in FY 2010. As with Liberty Green and all subsequent revitalization plans that require demolition of existing public housing units, LMHA committed to, and has now accomplished, one-for-one replacement of the 326 public housing units formerly on the Sheppard Square site.

  In fact, all rental development, both on- and off-site, is now complete, and the construction of the last on-site units, 23 for-purchase homes, is set to begin in FY 2018.

- **Liberty Green (Clarksdale) HOPE VI Revitalization**
  In redeveloping the Clarksdale public housing development, LMHA has to date received a total of $40 million in Federal HUD HOPE VI Revitalization grant funds, obtained over $200 million in physical development leverage, and partnered with several for-profit and non-profit developers to create more than 1,900 public housing, low-income tax credit, market rate rental, and homeownership units. All the rental units included in the original Revitalization Plan are complete. Following the economic downturn, the site plan was revamped to respond to evolving market conditions, and the unit mix was shifted toward market rate rental. A local developer has since constructed 173 market rate rental units in three buildings, with a portion of the units designated for students, and is now building a HOME 2 Suites by Hilton hotel containing approximately 100 rooms.

  - **Redevelopment of the Friary**
    During FY 2018, LMHA will continue to hold 24 units off-line at the Friary, a historic structure that LMHA purchased several years ago and had used as Liberty Green HOPE VI replacement public housing. More recently, the site was emptied because the structure is in need of comprehensive rehabilitation. In FY 2016, LMHA procured a private developer to redevelop the site. The agency subsequently submitted a disposition application to HUD, which was approved in FY 2017. The developer plans to apply for low-income housing tax credits during FY 2018. Once renovation work has been completed, LMHA will utilize 18 of the renovated units for public housing. An additional six replacement public housing units will be acquired in non-impacted areas.

- **Possible Park DuValle Rental Assistance Demonstration (RAD) Conversion**
  In 1996, LMHA received a HOPE VI grant to redevelop Cotter and Lang Homes as the mixed-income Park DuValle community. During FY 2018, LMHA will examine the feasibility of converting the 59 public housing units located in Park DuValle Phase I (The Oaks) to Project-Based

Vouchers (PBV) or Project-Based Rental Assistance (PBRA) through HUD's Rental Assistance Demonstration (RAD) program. Should the Housing Authority decide to proceed with a RAD conversion, LMHA will hold at least two meetings with residents of The Oaks to discuss conversion plans and provide opportunity for comment.

Increase Housing Choice through Stronger Rental Communities and Options, and Expanded Homeownership Opportunities

Affirmatively furthering fair housing by offering and promoting increased housing options for residents is a primary goal for the Housing Authority. This is done through a variety of means, including the pursuit of strategies recommended in the jurisdiction's *Analysis of Impediments to Fair Housing Choice*.

Key initiatives include:

- **Housing Choice Voucher (HCV) Homeownership Program**
  Homeownership is an important housing option for many low-income families, and it is an affordable and secure way for qualified LMHA families to achieve self-sufficiency. LMHA had the first Section 8 closing in the nation in November of 1997 and has experienced exponential growth over the years. The award winning program offers a comprehensive route to self-sufficiency for low-income families through mortgage assistance, counseling, and maintenance support. The HCV Homeownership option has helped LMHA families make the transition from renting to owning by allowing them to utilize the voucher to pay a portion of their mortgage for up to 15 years.

  Participants challenge their over-representation in poverty statistics and under-representation in indicators of success. In addition to financial assistance, the program provides intensive pre and post purchase counseling and requires homebuyer participation in Individual Development Accounts with a two to one match for repairs and maintenance to help families navigate the home-buying/home-owning process and increase their chances of success.

  In FY 2017, LMHA used the authorizations provided through MTW to expand the number of HCV Homeownership Program exception payment standard areas. The Housing Authority anticipates that setting the payment standard to 120% of Fair Market Rent in additional non-impacted census tracts will encourage program participants to purchase homes in areas of opportunity.

- **Resident Councils**
  LMHA has formed Resident Councils at many of its housing developments to assist and serve as a resource for the Housing Authority and the residents of the respective communities. Resident Councils are charged with the responsibility of promoting programs and activities that improve educational, recreational, cultural, and social opportunities at their developments. The Resident Council Board members are also responsible for managing the affairs and conducting the business of the organization, as well as consulting with and keeping residents informed.

- **Green Initiatives**

  - **Sheppard Square:** LMHA's greenest construction project to date, the Sheppard Square revitalization features mandatory recycling and composting; rain water retention, bio swales, and pervious pavers in the parking lots; photovoltaics; electric vehicle charging stations; a green roof; and four energy efficient / storm resistant houses. In addition to the Enterprise Green Community certification (Block B was certified during FY 2016 and an application for the remaining blocks, including the adaptive re-use of the historic Presbyterian Community

Center, is pending), LMHA is pursuing LEED Neighborhood certification, funded in part by a grant from the U.S. Green Building Council.

Thanks to funding from the Carol Mount Peterson Foundation, during FY 2016 LMHA expanded the St. Peter Claver Community Garden (located behind the Sheppard Square Management Office), adding 10 new raised beds to the 23 available previously. The grant also funded a new a "fitness garden" on the property with 10 fitness stations positioned along a walking path that connects to a newly designated "Mayor's Mile" within the footprint of Sheppard Square; a large, multi-purpose lawn area that provides space for activities such as yoga, tai-chi, and other group fitness classes; and up cycled playground equipment for children.

Also in FY 2016, LMHA received a $30,000 Place-Based Strategies Grant from Ohio Capital Impact Corporation to build a splash pad on the St. Peter Claver site. The project should be completed during FY 2018.

- **Parkway Place:** In FY 2016, LMHA secured a $38,750 grant from the Humana Foundation grant to construct a walking path with fitness stations; create a soccer field; and make improvements to the on-site community garden. The project is now in the preliminary design phase, with construction to begin in FY 2018.

- **Beecher Terrace:** LMHA was awarded a Choice Neighborhoods Implementation grant in December 2016, providing critical funding for the transformation of Beecher Terrace. The site's current 758 dwelling units will be razed and replaced by a green and sustainable mixed-income, mixed-use community. All new on-site construction is being planned to conform to Enterprise Green Community certification requirements, and LMHA will pursue LEED Neighborhood certification for the new community, thanks in part to technical assistance and funding being provided through a U.S. Green Building Council grant.

- **Smoke-Free Housing:** In January 2016, LMHA updated its public housing *Admissions and Continued Occupancy Policy* to begin phasing in a no-smoking requirement across all of its public housing stock. All newly admitted public housing families, as well as families transferring between public housing units, are now required to sign a no-smoking lease addendum indicating they will not smoke in their dwelling unit or in the common areas of their building. This policy will allow LMHA to gradually transition its public housing stock to no-smoking by prohibiting smoking in individual units whenever an existing family moves out and a new family moves in.

Develop Programs and Housing Stock Targeted to Populations with Special Needs Not Adequately Served Elsewhere in the Community

MTW allows LMHA to break from HUD established "norms" in order to maximize the potential of locally available resources to develop programs for people with specific needs. The goal is to meet needs not met by other agencies and to partner with local organizations that have social services programs that need a housing support element. Some of these needs will be transitional; others are for programs that provide more long-term support, particularly for single parents with children where the parent is working or preparing for work by participating in educational programs and young people enrolled in job and college prep programs. Developing comprehensive initiatives in these areas will continue to require regulatory relief. In FY2014, LMHA received Broader Use of MTW Funds Authority by executing an Amendment to Attachment D of the Agency's MTW Standard Agreement with HUD. The "Broader Use of MTW Funds" amendment gives LMHA the authority to use MTW funds for purposes other than those specified in Section 8 and Section 9 of the 1937 Housing Act, provided such uses are consistent with

other requirements of the MTW statute and have been proposed in the Agency's MTW Annual Plan and approved by HUD.

Encourage Program Participant Self-Sufficiency

The MTW Demonstration allows LMHA to rethink its policies – like the rent policy for Clarksdale HOPE VI replacement scattered sites – to encourage families to work towards housing self-sufficiency. LMHA will continue to promote self-sufficiency initiatives including the HCV Homeownership Program, the Family Self-Sufficiency (FSS) Program, and the agency's MTW Special Referral Programs, which tie supportive services to a housing voucher, to encourage resident self-sufficiency, education, and job training.

- **Credit Building Program for Public Housing Residents**
  In 2014, the Credit Builders Alliance, a national non-profit that helps low- and moderate-income households and businesses build credit and financial access, completed the two-year *Power of Rent Reporting Pilot*, funded by the Citi Foundation. The pilot tested a new method of building positive credit histories for renter households through the regular, on-time payment of rent. Historically, homeowners have been able to build positive credit through on-time mortgage payments, but there has been no similar mechanism available to renter households. Through the pilot, eight affordable housing providers became credentialed with Experian RentBureau and began rental payment reporting on behalf of 1,255 low-income residents. The results were promising. A large majority (79%) of participants experienced an increase in credit score, with an average increase of 23 points.

  Here in Louisville – Louisville Metro Government, the Metropolitan Housing Coalition, and LMHA have begun a conversation with the Credit Builders Alliance staff members who led the pilot program to determine whether it would be feasible to pilot such a program with LMHA public housing residents. During FY 2018, LMHA will continue to work with these partners on program design.

HUD/MDRC Housing Choice Voucher Rent Reform Demonstration

HUD is conducting an HCV Program rent reform demonstration program designed to test and evaluate an alternate rent policy, in conjunction with several MTW public housing agencies, including LMHA. The Housing Authority has modified its policies and rent calculation methodology for a group of program participants (the Alternate Rent Group), and will compare the results to a group of program participants who are assisted under the rent policies used for all other LMHA-assisted households (the Control Group).

The study will test an alternative rent policy that includes:

- A revised formula to calculate tenant share of rent and utilities at 28% of gross annual income
- A minimum rent payment from tenants to owners of $50
- A revised method for determining gross annual income
- Elimination of deductions and allowances
- A disregard of income from assets valued below $25,000
- A triennial recertification procedure
- A limited number of interim re-certifications per household per year
- A revised methodology for determining tenant rent to owner
- A simplified utility allowance schedule
- A hardship policy to protect tenants from excessive rent burden

II. General Housing Authority Operating Information

(II) General Housing Authority Operating Information

Annual MTW Plan

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

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

AMP Name and Number	Bedroom Size 0	1	2	3	4	5	6+	Total Units	Population Type *	# of UFAS Units: Fully Accessible	Adaptable
H Temple Spears, 1515 Cypress St. (AMP TBD)	0	65	0	0	0	0	0	65	General	0*	2
N/A	0	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added 65

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

If Other, please describe: N/A

** LMHA Note : The H Temple Spears development is an adaptive rehab of an old school building. The building was originally converted into a senior nursing facility and then into a general occupancy apartment building. Although no units meet current accessibility guidelines, all 65 units met the guidelines in effect at the time the school was originally converted into a senior nursing facility. Should LMHA undertake significant rehab in the future, at least 5% of the units will be brought into compliance with accessibility guidelines in effect at that future date.*

Planned Public Housing Units to be Removed During the Fiscal Year

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
Beecher Terrace (KY001000002)	121	LMHA received a Choice Neighborhoods Initiative Implementation Grant in December 2016. The demolition of 121 units is required to permit the first construction phase, a 120-unit senior building to be constructed on the northern half of Old Walnut Park between 9th and 10th streets.
Fegenbush-Whipps Mill (KY001000017)	34	21 for excessive mold and/or lead abatement costs. 13 to Simmons College for student housing.
HOPE VI Scattered Sites (KY001000034)	44	10 for recurring water damage. 10 to Simmons College for student housing. 24 at the Friary (See also *Other Changes to the Housing Stock Anticipated During the Fiscal Year* table below.)
Total Number of Units to be Removed	199	

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	**Anticipated Number of New Vouchers to be Project-Based ***	**Description of Project**
Various	80-100	As part of its Beecher Terrace Choice Neighborhoods Initiative Transformation Plan, LMHA has committed to providing 442 off-site replacement units by September 30, 2023. Most, if not all, of these units will be funded with project-based vouchers. For units that the Housing Authority does not own, LMHA will begin a rolling competitive process during FY 2018 to select PBV recipients. This competitive process will remain open until all 442 replacement units have been provided. Units will be developed as qualified PBV recipients are selected. The Housing Authority anticipates approximately 80-100 tenant-based vouchers will be project-based as part of this process during FY 2018, although LMHA will exceed this number should additional eligible units be identified.
N/A	0	N/A
N/A	0	N/A

Anticipated Total New Vouchers to be Project-Based	80-100	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	80-100
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	50

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

Other Changes to the Housing Stock Anticipated During the Fiscal Year
In 2013, LMHA acquired full ownership of the 100 units built through Phase I of the Park DuValle HOPE VI project (59 public housing units, 21 tax credit, and 20 market rate). During FY 2017, LMHA acquired full ownership of all 213 units built through Park DuValle Phase II (95 public housing, 54 tax credit, and 64 market rate). During FY 2018, LMHA plans to acquire full ownership of all 108 units built through Park DuValle Phase III (79 public housing, 18 tax credit, and 11 market rate). The acquisition of Park DuValle Phase IV units will follow in a future year.
During FY 2018, LMHA will continue to hold 24 units off-line at the Friary, a historic structure that LMHA purchased several years ago and had used as Liberty Green HOPE VI replacement public housing. More recently, the site was emptied because the structure is in need of comprehensive rehabilitation. In FY 2016, LMHA procured a private developer to redevelop the site. The agency subsequently submitted a disposition application to HUD, which was approved in FY 2017. The developer plans to apply for low-income housing tax credits during FY 2018. Once renovation work has been completed, LMHA will utilize 18 of the renovated units for public housing. An additional six replacement public housing units will be acquired in non-impacted areas. Although disposition may occur during FY 2018, LMHA does not currently anticipate that any acquisition will occur before FYE.
LMHA is committed to one-for-one replacement of all units removed from its public housing stock beginning with the demolition of Iroquois Homes. Acquisition does not occur on a fixed schedule, but rather as suitable properties become available. During FY 2018, LMHA will be working toward one-for-one replacement of the units listed in the *Planned Public Housing Units to be Removed During the Fiscal Year* table, as well as the continued replacement of units removed through the demolition of Iroquois Homes. Replacement units may be PBV, public housing, or local, nontraditional units.
LMHA is also committed to one-for-one replacement of all 758 Beecher Terrace units that will be demolished as part of its Choice Neighborhoods Initiative Transformation Plan. Although LMHA currently plans to create replacement units using PBV, a portion of the replacement units may be provided as public housing should this favorably impact the financing of a particular project or be deemed advantageous in order to allow the units to serve households with incomes up to 80% of AMI.
Off-site Beecher Terrace replacement unit development will begin with the purchase of two 4-plexes (located in the Russell Neighborhood) from New Directions Housing Corp. in FY 2018. Four of these units will be used as Beecher replacement housing. Upon HUD approval of proposed Activity #49-2018, four of the units will be acquired using MTW Broader Use of Funds authority. These units will be restricted to households with incomes below 80% of AMI, but will not receive direct, ongoing operating subsidy. LMHA is also examining the feasibility of acquiring a second, 12-unit apartment building in Russell where the same funding structure would be used.
During FY 2018, LMHA will examine the feasibility of converting the 59 public housing units in Park DuValle Phase I (The Oaks) to Project-Based Vouchers (PBV) or Project-Based Rental Assistance (PBRA) through HUD's Rental Assistance Demonstration (RAD) program. Should the Housing Authority decide to proceed with a RAD application, LMHA will hold a meeting with residents of The Oaks to discuss conversion plans and provide opportunity for comment.

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year
This table describes the Housing Authority's planned capital projects by public housing development. Section V, "Sources and Uses of Funds," describes how the Housing Authority plans to use its MTW single fund flexibility, which encompasses the Capital Fund Program, during FY 2018.
Avenue Plaza/550 Apts. Annual A/E Contract ($14,988); Dwelling Equipment ($25,479); Eviction Prevention ($2,743); Resident Stipends ($9,000); Safety/security ($253,200); Paint/drywall ($48,000); Bathroom fixtures ($144,000); Plumbing infrastructure ($233,430); Waste management ($50,000)
Beecher Terrace CHOICE Implementation ($2,000,000); Annual A/E Contract ($29,310); Landscaping ($30,006); Dwelling Equipment ($49,827); Safety/security ($47,500); Eviction Prevention ($19,885); Resident Stipends ($3,000)
Dosker Manor Annual A/E Contract ($40,341); Dwelling Equipment ($68,580); Eviction Prevention ($1,371); Resident Stipends ($31,000); Safety/security ($538,200); PTAC ($350,000); Signage ($5,000); Landscaping ($2,500); Office equipment ($5,000)
Lourdes Hall Dwelling Equipment ($22,230); Eviction Prevention ($5,486); Resident Stipends ($9,000); Safety/security ($135,400); HVAC ($30,000); Painting ($50,000); Roof ($20,000); Structural repairs ($15,000)
Park DuValle Phase II Mixed Finance Capital Contributions ($182,665); Phase III Mixed Finance Capital Contributions ($222,997); Phase IV Mixed Finance Capital Contributions ($78,040)
Parkway Place Annual A/E Contract ($30,561); Landscaping ($29,997); Dwelling Equipment ($51,954); Safety/security ($197,500); Eviction Prevention ($14,400); Parking lots ($105,000); Roofs ($250,000); Plumbing infrastructure ($50,000); Gator carts ($48,000); Windows ($50,000); HVAC ($80,000)
St. Catherine Court Eviction Prevention ($686); Resident Stipends ($8,400); Safety/security ($103,200)
Scattered Sites Annual A/E Contract ($21,723); Landscaping/erosion control ($179,997); Dwelling Equipment ($36,930); Eviction Prevention ($3,429); Brick work ($75,000); Hot water heaters ($75,000); Sidewalks ($50,000); HVAC ($250,000); Painting ($50,000); Abatement ($150,000)
Will E. Seay Plaza Annual A/E Contract ($13,077); Boilers ($545,000); HVAC ($200,000)

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

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

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/ Leased***
Federal MTW Public Housing Units to be Leased	3900	46800
Federal MTW Voucher (HCV) Units to be Utilized	9750	117000
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	7	36
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	13657	163836

* 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

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

LMHA is in compliance with all MTW statutory requirements.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions	
Housing Program	**Description of Anticipated Leasing Issues and Possible Solutions**
Public Housing (Scattered Sites)	LMHA anticipates vacancies in its Public Housing Scattered Sites, in particular in AMP KY001000034, which includes 24 units currently off-line at the Friary. For additional detail, see *Other Changes to the Housing Stock Anticipated During the Fiscal Year* table above. LMHA has also had difficulty fully leasing single-family scattered site units, which currently have a work/school requirement. LMHA plans to remove this requirement as of April 1, 2017, closing out Activity #9-2007, "Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites."
Public Housing (Dosker Manor)	LMHA has had difficulty fully leasing Dosker Manor, an elderly/disabled high rise development, for a number of years. In FY 2008, the Housing Authority used its MTW authority to reduce the age at which a non-disabled applicant is eligible for occupancy from 62 to 55, and in FY 2010, LMHA again used the flexibility provided through MTW to begin offering lease-up incentives at the site. Although leasing rates improved following each intervention, they have not reached levels deemed acceptable by LMHA. During FY 2015, the agency was awarded Emergency Safety and Security Grants funding for Dosker Manor, and the Housing Authority completed critical security upgrades at the site during FY 2017. LMHA will continue to consider if an official elderly and/or disabled-only designation of one or more buildings at the site is appropriate.
Public Housing (General)	LMHA will begin relocating public housing families from Beecher Terrace during FY 2018, and may need to leave units at other public housing sites temporarily unoccupied to make certain there are sufficient housing options available to relocating residents.
MTW Housing Choice Voucher (HCV) Program	LMHA has been experiencing lower than normal leasing rates in its HCV Program. Strategies to increase leasing include: absorbing incoming ports; accepting new families off the waiting list; accepting homeless veteran and Special Referral Program referrals; and hiring new staff for vacant positions, including Housing Specialists and Housing Clerk Typists. In addition, Metro Government has hired two additional housing inspectors, who are dedicated to HCV units. This will reduce the average number of days it takes to complete an initial inspection, allowing units to be added to the HCV Program more quickly.

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Program	Community-Wide	15,301	Open	No
Federal MTW Public Housing Units	Community-Wide	3,653	Open	No
Federal MTW Public Housing Units	Site-Based	3,625	Open	No
Federal MTW Public Housing Units / Federal MTW Housing Choice Voucher Program	Merged / Program Specific	951	Open	No
Project-Based Local, Non-Traditional MTW Housing Assistance Program	Program Specific	0	Open	No

Rows for additional waiting lists may be added, if needed.

* *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
N/A
N/A

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

LMHA provides temporary housing in units located at the Liberty Green Community Center to Spinal Cord Injury out-patients of the Frazier Rehab Institute. Housing is also provided to homeless YouthBuild participants in units located at Beecher Terrace. Households must be low-income to qualify.
N/A
N/A

If Other Wait List Type, please describe:

N/A
N/A
N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

N/A

III. Proposed MTW Activities: HUD approval requested

LMHA is proposing two new MTW activities in FY 2018:

- Activity #48-2018: Local Project-Based Voucher (PBV) Program
- Activity #49-2018, "Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing"

Activity #48-2018: Local Project-Based Voucher (PBV) Program

A. Description

HUD awarded LMHA a $29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All buildings on the current Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community.

Today's Beecher Terrace includes 758 public housing dwelling units that together contain 1,317 bedrooms. Per the Housing Authority's CNI Implementation Grant Agreement with HUD, LMHA must replace **all 1,317 bedrooms** currently on the site. LMHA has further committed to replacing **all 758 units** on the site, ensuring that the same number of households residing at Beecher today will be housed post-revitalization.

Replacement units will be affordable to low-income families for a minimum of 40 years, and all replacement housing must be available to families by the end of the CNI Implementation Grant term, which expires September 30, 2023.

The Housing Authority anticipates that all or nearly all of the 758 Beecher Terrace replacement units will be subsidized with Project-Based Voucher (PBV) assistance.

In order to deliver on this large-scale commitment within a limited time frame, and while meeting all other CNI program requirements, LMHA plans to utilize the regulatory flexibilities provided through MTW to create a Local PBV Program.

This Local PBV Program will not be limited to Beecher replacement units; however, the provision of these units will be the central goal of the Program until all 1,317 pledged bedrooms have been delivered through the creation of approximately 758 affordable dwelling units.

The Housing Authority's Local PBV Program has been designed with the following key objectives in mind:

- Supporting neighborhood revitalization, especially the transformation of the Russell neighborhood (which includes Beecher Terrace), by creating new housing choices that provide in-neighborhood relocation options for displaced LMHA residents and attract new residents to the neighborhood;
- Increasing housing choices for low-income families in high-opportunity areas;
- Providing options for low-income families to live in mixed-income and mixed-use developments; and
- Incentivizing developers to preserve or create affordable housing units that expand housing options for low-income families.

Use of the following MTW authorities will further the Housing Authority's ability to meet these key objectives:

Proposal Selection Process

Proposed Policy: PBV proposals may be selected based on any one of the following three methods:

1. The results of a previous competition (no MTW authority required);
2. Issuance of a Request for Proposals, which may be limited to a specific site or sites or to geographic areas that meet certain criteria (for example, non-impacted census tracts); or
3. Selection of LMHA-owned properties without a competitive process or prior HUD approval.

1st Applicable Regulation: Current regulations at 24 CFR 983.51 require that proposals not be limited to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.

Rationale for Use of MTW Authority: LMHA and Louisville Metro Government currently maintain site control for (or may obtain site control for) several highly desirable properties that are suitable for development as Beecher Terrace replacement units. In addition, Louisville Metro Government has committed $1 million to the acquisition of an additional parcel(s) for development as Beecher Terrace replacement housing.

The Housing Authority believes that the offer of such properties to developers at market rate, below market rate, or no cost will serve as a strong inducement to developers to apply for PBV assistance, while giving LMHA greater ability to ensure that units are developed at properties that will be highly desirable to LMHA residents, and that in some cases are located at critical locations where neighborhood revitalization efforts are being concentrated. For example, the Housing Authority has site control of a key parcel located at the epicenter of the Russell neighborhood, directly across the street from the Kentucky Center for African American Heritage and fronting the planned arts and cultural district along Muhammad Ali Boulevard. Compatible redevelopment of this parcel would have a catalytic effect, spurring additional development along the Muhammad Ali corridor.

Secondly, the CNI Program requires that replacement housing units be built either in the Russell neighborhood or in non-impacted census tracts.[1] LMHA seeks the authority to restrict PBV proposals to these or any other geographic criteria that affirmatively further fair housing or encourage affordable housing development in neighborhoods that are undergoing significant revitalization.

2nd Applicable Regulation: Current regulations at 24 CFR 983.51 require that properties owned by the Public Housing Agency must be selected through a competitive process.

Rationale for Use of MTW Authority: While LMHA believes that there will be a strong response from local developers interested in project-based assistance for their developments (The Housing Authority has never made PBV assistance available before, and the level of interest already expressed by developers leads us to believe that there is significant pent up demand), the provision of such a large number of Beecher Terrace replacement units by September 30, 2023 will be a challenge, and the Housing Authority has no interest in waiting to see if the private market will

[1] A "non-impacted census tract" is a census tract in which the poverty rate is below 40% and the minority concentration is no more than 20% higher than that for the MSA as a whole.

fully accomplish this task. LMHA would also like to hasten the pace with which PBV units come on-line, so that families relocating from the Beecher site can move directly into permanent replacement units.

To this end LMHA has obtained site control for two turnkey four-plexes (8 units in total) in the Russell neighborhood at which it would like to project-base assistance for four units. As all Beecher replacement units will be in mixed-income developments, the other four units will also be restricted to families whose household income is below 80% of AMI, but these non-PBV units will not receive direct, ongoing subsidy.[2]

LMHA is also examining the feasibility of acquiring a second, 12-unit apartment complex in the Russell neighborhood, at which it would also like to project-base assistance at half of the units, while restricting the balance to families whose household income is below 80% of AMI.

LMHA will continue to pursue the acquisition of properties suitable for use or development as Beecher Terrace replacement units, and seeks authority to project-base assistance at such properties.

Proposal Selection Requirements

Proposed Policy: Up to 100% of units within any given project may be awarded PBV assistance. However, in furtherance of the Housing Authority's commitment to the development of mixed-income housing, at its sole discretion, LMHA may limit the percentage of units that may be project-based at any given project to some amount less than 100%.

Applicable Regulation: 24 CFR 983.56 provides that a Public Housing Agency may not provide PBV assistance for more than 25% of units within a given project unless the units are in a building that has four or fewer dwelling units or the additional units house elderly and/or disabled families or the families residing in the additional units receive (and are required to participate in) supportive services.

Rationale for Use of MTW Authority: LMHA is committed to providing Beecher replacement units in mixed-income communities and in areas of opportunity, but the Housing Authority does not believe that a particular structure or project should be looked at in isolation when considering whether awarding PBV assistance will contribute to the goal of creating mixed-income communities.

For example, a local developer, who would qualify for PBV assistance under the previous competition selection method and who has expressed interest in receiving such assistance, is currently developing a 21-unit apartment building within an existing New Urbanist community that already contains more than 2,000 market-rate units. The median household income in this community is $124,495 (more than 2.5 times the average median income for Louisville Metro). Within this context, providing PBV assistance for all 21 units within this building would increase,

[2] Additional MTW flexibilities related to this project will be requested through the Housing Authority's FY 2018 MTW Annual Plan.

rather than decrease, the income mix within the community, and would provide LMHA residents with a wide variety of amenities and services, including a new elementary school, YMCA, grocery store, drugstore, restaurants, childcare facility, parks, and pools.

Likewise, on-site at Beecher Terrace, LMHA plans to project-base just under 50% of the new units (49.4%). The remaining units will be either tax-credit-only (21.6%) or market rate (29.6%). The approximate proportions are the result of a two-year, CNI-funded community planning process that involved more than 600 residents and community stakeholders and nearly 100 meetings. The ratio also meets the CNI Program requirements regarding mixed-income development.

Requirements for Rehabilitated and Newly Constructed Units

Proposed Policy: When LMHA has received owner notice that the rehabilitated or newly constructed housing is completed, the Housing Authority will inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter a HAP Contract (AHAP), including compliance with HQS standards, except that in lieu of LMHA inspection of the units, the owner may submit the Certificate of Occupancy issued by Louisville Metro Government as evidence of compliance.

Applicable Regulation: According to 24 CFR 983.156, upon owner notice that rehabilitated or newly constructed housing is completed, the Public Housing Agency must inspect the units to determine compliance with the AHAP, including HQS.

Rationale for Use of MTW Authority: Before issuing a Certificate of Occupancy, Louisville Metro Government inspects rehabilitated and newly constructed housing to ensure compliance with local codes and ordinances, which are more stringent than HQS. LMHA believes it is not a cost effective use of federal funds to duplicate these inspections. LMHA has used this MTW authority in the past at developments associated with several of its HCV Special Referral Programs.

HAP Contract Term

Proposed Policy: The initial term of the HAP contract will not exceed 20 years or be less than one year. LMHA may agree to enter into an extension at the time of the initial HAP contract term or any time before expiration of the contract, for an additional term not to exceed 20 years, if LMHA determines an extension is appropriate to continue providing affordable housing for low-income families. LMHA may provide for multiple extensions; however, in no circumstance may such extensions exceed 20 years, cumulatively.

Applicable Regulation: Per 24 CFR 983.205, the initial term of the HAP contract must not exceed 15 years. Although contract extensions are permitted, in no case may the cumulative length of any extensions granted total more than 15 years.

Rationale for Use of MTW Authority: LMHA has committed that Beecher Terrace replacement housing will be permanent units, and in its CNI Implementation Grant application, committed to providing a 40-year affordability restriction for all replacement units. Increasing the permitted cumulative length of the HAP contract from 30 years (15 year initial contract plus 15 year extension) to 40 years (20 year initial contract plus 20 year extension) will allow us to fulfill this commitment. The policy would apply to LMHA-owned units as well.

This proposed policy is also consistent with regulatory changes to the HAP contract term described in the Federal Register notice entitled "Housing Opportunity Through Modernization Act of 2016: Implementation of Various Section 8 Provisions," which was published in the Federal Register on January 18, 2017 (82 FR 5458) and originally scheduled to become effective on April 18, 2017. It is the Housing Authority's understanding that this notice is currently subject to a regulatory freeze/review by Executive Order, and that its future implementation is uncertain. Should the notice provisions permitting the initial PBV HAP contract term to extend for up to 20 years and providing that any extension(s) of the PBV HAP contract may cumulatively total up to 20 years be implemented at some future date, this MTW authority will be removed from subsequent MTW Annual Plans.

Inspections

Proposed Policy: LMHA will not inspect units at new tenant turnover. LMHA will inspect all units within a specific building concurrently once per year. Should the owner add or substitute a unit covered under the HAP contract, LMHA will inspect the new or substitute unit before providing assistance to that unit. LMHA will also conduct complaint inspections upon tenant request.

Applicable Regulation: The regulation at 24 CFR 983.103 requires that all units must be inspected at turnover. It also requires that at least 20% of the contract units in each building be inspected at least biennially.

Rationale for Use of MTW Authority: Conducting inspections concurrently at each building once per year will increase the cost effectiveness of federal expenditures by allowing LMHA to schedule inspections by geography instead of conducting inspections on an individual basis across the city whenever a unit turns over.

In any given year, one unit may turn over several times while another unit houses the same family for the entire 12 months. Under HUD's current regulations, the unit experiencing multiple turnovers will receive multiple inspections during the year, while the unit that does not turn over will likely not be inspected at all unless captured in the random 20% sampling of units inspected biennially. It may be years between inspections for a unit occupied by a long-term tenant.

LMHA believes inspecting all units annually, but in a more geographically efficient manner, will better ensure compliance with HQS.

LMHA may still choose to rely on an alternative inspection process at mixed-finance properties in lieu of an annual inspection. However, the Housing Authority will ensure that all units are inspected at least once per year.

Locally-Defined Definition of Elderly

Proposed Policy: For the purpose of determining the order in which families on the Housing Authority's PBV waiting list are referred by LMHA to the owner of a project-based elderly or elderly/disabled building, an "Elderly Family" will be defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 55 years of age. It may include two or more persons who are at least 55 years of age living together, or one or more persons who are at least 55 years of age living with one or more Live-In Aides.

Applicable Regulation: Per 24 CFR 5.403, an elderly family is defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more Live-In Aides.

Rationale for Use of MTW Authority: For the purpose of determining eligibility for admission to designated housing developments in its Public Housing Program, LMHA has lowered the age at which a person can be considered elderly from 62 to 55. LMHA wishes to maintain consistency in this usage between the two programs. This is especially important to provide additional housing choices to public housing residents relocating from Beecher Terrace, as at the time of CNI Implementation Grant application submission, 117 Beecher households included a family member between the ages of 55 and 61.

Income Limits

Proposed Policy: The income eligibility limit for PBV units will be increased from 50% to 80% of Area Median Income (AMI) except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd-party funding sources (for example, units that also have low-income housing tax credits or funding awarded through the National Housing Trust Fund). In the case of funding sources that impose an income cap that falls between 50% and 80% of AMI, the maximum allowable income cap will be used (For example, PBV units that also have low-income housing tax credits capped at 60% of AMI, would have an income eligibility limit of 60% of AMI).

Applicable Regulation: PBV units are subject to the income eligibility requirements governing the tenant-based HCV Program, which can be found at 24 CFR 982.201. Typically, admission to a PBV unit is limited to households whose income does not exceed 50% of AMI with special exceptions made only for certain households with incomes between 50% and 80% of AMI. These exceptions include, but are not limited to, families that are "continuously assisted" under the 1937 Housing Act or that that meet additional eligibility criteria specified in the Public Housing Agency's Administrative Plan.

Rationale for Use of MTW Authority: Today, Beecher Terrace's 758 public housing units serve households whose income does not exceed 80% of AMI at the time of admission. Absent MTW authority, post-revitalization, the 758 planned PBV replacement units will serve households whose income does not exceed 50% of AMI.

758 units represents nearly 20% of the Housing Authority's total public housing stock today. Absent the requested MTW flexibility, LMHA's ability to serve families with incomes between 50% and 80% of AMI will be significantly hampered. Households in this income range will simply have fewer housing choices.

Regulation already makes provision for the admission of certain households with incomes between 50% and 80% of AMI, including in the fairly generic case that families "meet additional eligibility criteria specified in the PHA administrative plan." LMHA is simply requesting the ability to increase the income eligibility limit to 80% of AMI without "additional eligibility criteria."

Income and Asset Verification

Proposed Policy: For PBV units that are also low-income housing tax credit (LIHTC) units, LMHA will utilize the LIHTC program's Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at recertification.

Applicable Regulation: 24 CFR 982.201 provides that Public Housing Agencies must verify that families are income-eligible before issuing them a voucher. Regulations at 24 CFR 982.516 further require that Agencies must re-examine and verify family income at least annually thereafter; family assets must be verified at least once every three years.

Rationale for Use of MTW Authority: Owners of PBV units that utilize tax credits must comply with federal LIHTC regulations, which are very similar to HCV regulations. This will increase the cost effectiveness of federal expenditures by reducing LMHA staff cost incurred to verify income and assets, while still meeting the objective of the federal regulation, which is to ensure that families are income-eligible and that their Total Tenant Payment is equitable and justifiable. Residents will also benefit as they will not have to produce redundant documentation to both LMHA staff and the PBV owner. The Tenant Income Certification form requires the client's statement of income and assets, the client's signature, and the property owner's certification that they verified the data provided by the client, and is therefore reliable documentation of the client's income/asset profile.

Notes:

- LMHA recognizes that several of the authorities requested above require modifications to the OMB-numbered HAP contract. Following activity approval, LMHA will submit a local HAP contract to HUD that reflects the approved modifications as a technical amendment to the MTW Annual Plan then in effect or in any manner that may otherwise be directed by HUD.

- LMHA already uses a number of HUD-approved MTW activities within its HCV Program. The Housing Authority plans to use the following eligibility, rent, and occupancy flexibilities in its PBV Program as well:
  - Alternate year reexaminations of elderly and disabled families (Activity #4-2007)
  - Elimination of standard earned income disregard (Activity #32-2012) and creation of new earned income disregard for elderly families (Activity #6-2008)
  - Standard medical deduction (Activity #8-2008)
  - Deduction of childcare expenses when determining Program eligibility (Activity #27-2011)
  - Annual contract rent increase limit (Activity #39-2012)
  - Financial aid disregard in calculation of Total Tenant Payment (Activity #40-2014)

B. Relation to Statutory Objectives

This activity will increase high quality housing choice for low-income families by encouraging the development of affordable, mixed-income housing in areas of opportunity and in neighborhoods undergoing targeted revitalization; by allowing families with incomes between 50% and 80% of AMI to live in PBV units; and by allowing families whose head, co-head, spouse, or sole member is between the ages of 55 and 61 to have the option to live in an elderly or elderly/disabled building.

Lengthening PBV contracts to a maximum of 40 years will ensure that these housing choices remain available to families over the long-term.

The activity will increase the cost effectiveness of federal expenditures by eliminating duplicative inspections and by allowing inspectors to coordinate inspections by geography, while still ensuring that units are inspected annually. Likewise, the activity will streamline the process for income and asset verification.

C. Anticipated Impact on the Stated Objectives

By September 30, 2023, LMHA plans to develop 758 new PBV units, leveraging a $29,575,000 CNI Implementation grant and more than $200 million in additional committed funds, to create a diverse array of housing choices for low-income families. The new housing will be operated in a manner that increases the cost effectiveness of federal expenditures by reducing income/asset verification and inspection costs.

D. Anticipated Schedule for Achieving the Stated Objectives

Upon HUD approval of this activity, LMHA will begin soliciting PBV proposals. Concurrently, the Housing Authority will develop a local HAP contract for submission to the MTW Office within two weeks of activity approval.

LMHA anticipates it will begin selecting proposals for PBV award before the end of calendar year 2017, awarding approximately 100 – 150 PBV vouchers annually in order to fulfill its commitment to create 758 new PBV units by September 30, 2023. Once all Beecher Terrace replacement units have been provided, the Housing Authority will make a determination as to whether or not it should close the application process for its Local PBV Program.

Timeline:

Louisville Choice Neighborhoods Implementation Grant Replacement Housing Schedule		
TASK NAME	**START DATE**	**COMPLETION DATE**
CNI IMPLEMENTATION GRANT PERIOD	**12/12/16**	**9/30/23**
HOUSING IMPLEMENTATION		
Relocation / Demolition (59 Buildings; 768 Units)		
Relocation of Phase I households	5/26/17	9/30/17
Phase I Demolition (9 buildings; 121 units)	10/5/17	12/31/17
Relocation of Phase II households	4/1/18	9/30/18
Phase II Demolition (29 Buildings; 392 units)	10/1/18	3/31/19
Relocation of Phase III households	3/4/19	9/30/19
Phase III Demolition (21 buildings; 255 units)	10/1/19	5/31/20
LMHA Off-Site Acquisition		
1506 & 1508 W. Market St. (Turnkey Acquisition of Two 4-Plex Apartment Buildings)		
Acquisition	8/15/17	8/15/17
Lease-Up / Stabilization	8/15/17	11/1/18
Additional Off-Site Acquisition as Opportune	7/1/18	12/31/22
Off-Site Project Based Voucher Partnership (438 units)*		
Release of Rolling, General RFP Open to New Construction, Rehab, & Turnkey Units (No Location Specified)	9/1/17	9/30/22
Application Review and Selection for General, Rolling RFP	11/1/17	12/31/22
Execution of Agreements & Commitment Letters for General, Rolling RFP	1/1/18	1/31/23
810 Barret Ave (Vacant property jointly owned by LMHA & Louisville Metro Government)		
Release of Solicitation of Interest	1/15/17	3/15/17
Public Comment Period on 5 Proposals Received	4/12/17	5/12/17
Application Review & Selection	6/1/17	TBD
Execution of Agreement & Commitment Letter	TBD	TBD
Construction	TBD	TBD
Lease-up & Stabilization	TBD	TBD
Iroquois Homes (Former Public Housing Site; Now Vacant Land)		
Release of RFP	3/1/18	4/30/18
Application Review & Selection	5/1/18	7/31/18
Predevelopment / LIHTC Application Process (If applicable)	8/1/18	4/30/19
Construction	5/1/19	10/30/20
Lease-up Stabilization	11/1/20	6/1/21
Property to Be Acquired by Louisville Metro Government Through Its "Louisville Cares" Affordable Housing Initiative ($1 Million Leverage Commitment to CNI Grant)		
Release of RFP	3/1/19	4/30/19
Application Review & Selection	5/1/19	7/31/19
Predevelopment / LIHTC Application Process (If applicable)	8/1/19	4/30/20
Construction	5/1/20	8/30/21
Lease-up & Stabilization	9/1/21	3/31/22
1718 Muhammad Ali Blvd (Vacant Land; LMHA Has Purchase Agreement)		
Release of RFP	3/1/19	4/30/19
Application Review & Selection	5/1/19	7/31/19
Predevelopment / LIHTC Application Process (If applicable)	8/1/19	4/30/20
Construction	5/1/20	8/30/21
Lease-up & Stabilization	9/1/21	3/31/22

TASK NAME	START DATE	COMPLETION DATE
Phase I: On-Site Senior Housing (120 units, including 116 PBV)		
Submission of 4% tax credit application (2017 award)	5/30/17	5/30/17
Initial Financial Closing and Construction Commencement	1/11/18	1/11/18
Housing Construction	1/12/18	6/1/19
Lease-up & Stabilization	5/1/19	10/1/19
Phase II: On-Site Mixed-Income, Multifamily (100 units, including 39 PBV)		
Submission of 9% tax credit application (2018 set-aside)	7/1/2017	10/6/2017
Initial Financial Closing and Construction Commencement	10/1/2018	10/1/2018
Housing Construction	11/2/2018	2/1/2020
Lease-up & Stabilization	1/1/2020	8/1/2020
Phase III: On-Site, Mixed-Income, Multifamily (100 units, including 41)		
Submission of 9% tax credit application (2019 set-aside)	7/1/2018	10/5/2018
Initial Financial Closing and Construction Commencement	8/1/2019	8/1/2019
Housing Construction	10/1/2019	2/27/2021
Lease-up & Stabilization	11/1/2020	6/1/2021
Phase IV: On-Site, Mixed-Income, Multifamily (100 units, including 40 PBV)		
Submission of 9% tax credit application (2020 set-aside)	7/1/2019	10/4/2019
Initial Financial Closing and Construction Commencement	8/1/2020	8/1/2020
Housing Construction	10/1/2020	2/27/2022
Stabilization	11/1/2021	6/1/2022
Phase V: On-Site, Mixed-Income, Multifamily (200 units, including 80 PBV)		
Submission of 4% tax credit application (2021 award)	12/1/2020	4/1/2021
Initial Financial Closing and Construction Commencement	7/1/2021	7/1/2021
Housing Construction	7/2/2021	12/1/2022
Lease-up & Stabilization	11/1/2022	4/1/2023

E-I.Activity Metrics Information

LMHA will track the following HUD Standard Metrics for this activity:

CE #1: Agency Cost Savings[1]				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Unit Inspections			
	As of FY2017: Total cost is $0 (No PBV units) **FY2017 average inspection cost per HCV unit:** $37.03 (1.5 inspections per unit * 0.6 hrs per inspection * $41.14 per staff hour)	$1,234.20 using FY2017 staff cost (50 initial inspections for units where LMHA is inspector (as opposed to units where CO is used) * 0.6 hrs per inspection * $41.14 per staff hour)	TBD	TBD

	Income / Asset Verification			
	As of FY2017: Total cost is $0 (No PBV units) **FY2017 average verification cost per HCV unit:** $21.12 (0.75 hrs per verification * $28.16 per staff hour)	$1,126.40 using FY2017 staff cost (0.4 hrs per verification * 100 verifications * $28.16 per staff hour)	TBD	TBD
	Total Savings			
	As of FY 2017: $0 (No PBV units) **FY2017 average verification + inspection cost per HCV units:** $58.15	$3,454.40 (FY2018 total verification & inspection cost for all PBV units - FY2017 total verification & inspection cost for 100 HCV units)	TBD	TBD
	Cost of inspecting and verifying income/assets for PBV units annually prior to implementation	Expected cost of inspecting and verifying income/assets for PBV units during FY	Actual cost of inspecting and verifying income/assets for PBV units during FY	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

[1] Although average per unit inspection and verification costs are expected to decrease over time (when comparing traditional HCV units to new PBV units), total inspection and verification costs are expected to increase over time as new PBV units are developed.

CE #2: Staff Time Savings[1]				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	Unit Inspections			
	As of FY2017: 0 hrs (No PBV units) **FY2017 average inspection hours per HCV unit:** 0.9 hrs (1.5 inspections per unit * 0.6 hrs per inspection)	30 hrs (50 initial inspections for units where LMHA is inspector (as opposed to units where CO is used) * 0.6 hrs per inspection)	TBD	TBD
	Income / Asset Verifications			
	As of FY2017: 0 hrs (No PBV units) **FY2017 average verification hours per HCV unit:** 0.75 hrs	40 hrs **(**0.4 hrs per verification * 100 verifications)	TBD	TBD
	Total Savings			
	As of FY 2017: 0 hrs (No PBV units) **FY2017 average verification + inspection**	100 hrs (FY2018 total verification & inspection hrs for all PBV units - FY2017 total verification &	TBD	TBD

	hours per HCV unit: 1.7 hrs	inspection hrs for 100 HCV units)		
	Staff hours expended inspecting and verifying income/assets for PBV units annually prior to implementation	Expected staff hours expended inspecting and verifying income/assets for PBV units during FY	Actual staff hours expended inspecting and verifying income/assets for PBV units during FY	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

[1] Although average staff time spent per unit on inspections and verifications is expected to decrease over time (when comparing traditional HCV units to new PBV units), total staff time spent per unit on inspections and verifications is expected to increase over time as new PBV units are developed.

CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: $0 (No PBV units)	$19,048,700 ($190,487 (TDC for a 2-BR walkup) * 100 units)	TBD	TBD
	Amount leveraged prior to implementation of the activity	Expected amount leveraged during FY	Actual amount leveraged during FY	Explanation to be provided
Data Source(s): CNI quarterly reports; PHA financial records				

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number (#) of new housing units made available for households (HHs) at or below 80% AMI as a result of the activity (increase). If units reach a specific type of HH, give that type in this box.	Housing units of this type prior to implementation of the activity (#). This # may be zero.	Expected housing units of this type after implementation of the activity (#).	Actual housing units of this type after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of 2017: 0 (No PBV units)	100	TBD	TBD
	PBV units acquired/developed prior to implementation of the activity	Expected PBV units acquired/developed during FY	Actual PBV units acquired/developed during FY	Explanation to be provided
Data Source(s): CNI quarterly reports; Emphasys				

HC #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: 65 months	63 months	TBD	TBD

	Average applicant time on wait list prior to implementation of the activity.	Expected average applicant time on wait list during FY.	Actual average applicant time on wait list during FY.	Explanation to be provided
Data Source(s): Emphasys				

HC #4: Displacement Prevention				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
# of HHs at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of HH, give that type in this box: Families relocating from the Beecher Terrace public housing development	HHs losing assistance/moving prior to implementation of the activity (#).	Expected HHs losing assistance/ moving after implementation of the activity (#).	Actual HHs losing assistance/moving after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: 23 HHs moved (no assistance lost)[1]	130 HHs moved (no assistance lost)[2]	TBD	TBD
	# of HHs that lost assistance/ moved prior to implementation.	Expected # of HHs that will lose assistance/move during FY.	Actual # of HHs that lost assistance/ moved during FY.	Explanation to be provided
Data Source(s): Emphasys				

[1] In preparation for the first phases of on-site construction at Beecher Terrace, 23 households were relocated from the site during FY2017. No household lost assistance as a result of relocation. Moreover, post-revitalization, relocated households will receive an admission preference for all on- and off-site replacement units.

[2] In preparation for the first phases of on-site construction at Beecher Terrace, approximately 130 households are expected to be relocated from the site during FY2018. No lease-compliant household at or below 80% of AMI will lose assistance as a result of relocation. Moreover, post-revitalization, relocated households will receive an admission preference for all on- and off-site replacement units.

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
# of HHs able to move to a better unit &/or neighborhood of opportunity as a result of the activity (increase).	HHs able to move to a better unit &/or neighborhood of opportunity prior to implementation of the activity (#). This # may be zero.	Expected HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Actual increase in HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: 0 (No PBV units)	100	TBD	TBD
	# of HHs residing in a PBV unit prior to implementation of the activity	Expected # of HHs residing in a PBV unit at FYE	Actual # of HHs residing in a PBV unit at FYE	Explanation to be provided
Data Source(s): Emphasys				

J-K. Authorizations Cited and Explanation

Attachment C, Section B.3, "Definition of Elderly Family," which allows LMHA "to amend the definition of elderly to include families with a head of household or family member who is at least 55 years old." This authorization waives certain provisions of Section 3(b)(3) and (G) of the 1937 Act and 24 CFR 5.403 as necessary to implement the agency's Annual MTW Plan.

- Necessary to permit families whose head, co-head, spouse, or sole member is between the ages of 55 and 61 to reside in elderly and elderly/disabled developments.

Attachment C, Section D.1.a, which allows the Housing Authority "to determine the term and content of Housing Assistance Payment (HAP) contracts to owners during the term of the MTW demonstration." This authorization waives certain provisions of Section 8(0)(7) of the 1937 Act and 24 CFR 982.162 as necessary to implement the agency's Annual MTW Plan;

- Required to increase cumulative term of HAP contract (initial term plus any extensions) to 40 years.

Attachment C, Section D.3.a, which authorizes the Housing Authority "to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations." This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 CFR 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the agency's Annual MTW Plan.

- Necessary to initially determine families whose household income is between 50% and 80% of AMI eligible for PBV assistance.

Attachment C, Section D.3.b, which permits the Housing Authority to "adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations." This authorization waives certain provisions of 24 CFR 982.516 and 982 Subpart E, as necessary to implement the agency' s Annual MTW Plan.

- Needed to permit LMHA to accept the LIHTC program's Tenant Income Certification form to verify income and assets both for determining eligibility at admission and at recertification.

Attachment C, Section D.5, "Ability to Certify Housing Quality Standards," which allows LMHA "to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD." This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 CFR 982, Subpart I as necessary to implement the Agency' s Annual MTW Plan.

- Necessary to permit proposed inspection schedule.

Attachment C, Section D.6.c, which allows LMHA to "adopt a local process for determining whether units meet certain eligibility requirements, including "[p]rocedures to determine whether or not units meet the Agency's requirements regarding rehabilitation and construction, including what information is required to be submitted by owners to the Agency." This authorization waives certain provisions of Section 8(o)(13) of the 1937 Act and 24 CFR 983 Subpart D as necessary to implement the agency's Annual MTW Plan.

- Required to permit LMHA to accept the Louisville Metro Government issued Certificate of Occupancy as evidence of compliance with HQS in lieu of Housing Authority inspection of the units when determining whether the units meet the requirements for rehabilitation and construction.

Attachment C, Section D.7, "Establishment of an Agency MTW Section 8 Project-Based Program," which permits the Housing Authority "to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance."

- Needed to allow LMHA to project-base up to 100% of units within a given development.

Attachment C, Section D.7.a, which authorizes the Housing Authority "to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing" and allows that "[p]roject-based assistance for such owned units does not need to be competitively bid." This authorization waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and 24 CFR 982.1, 982.102 and 24 CFR Part 983 as necessary to implement the agency' s Annual MTW Plan.

- Necessary to project-base assistance at agency-owned units without a competitive process.

Attachment C, Section D.7.b, which permits LMHA "to establish a reasonable competitive process or utilize an existing local competitive process for project-basing leased housing assistance at units that meet existing Housing Quality Standards, or any standards developed by the Agency pursuant to this MTW Agreement and approved by the Secretary, and that are owned by non-profit, or for-profit housing entities." This authorization waives certain provisions of 24 CFR 983.51 as necessary to implement the agency's Annual MTW Plan.

- Needed to restrict PBV requests for proposals to a specific site or sites or to geographic areas that meet certain criteria (for example, non-impacted census tracts).

L. Information for Rent Reform

1) *Impact Analysis*

This activity has a single rent reform component: the use of the LIHTC Program's Tenant Income Certification form to serve as verification of household assets and income for PBV units that are also LIHTC units.

Because the calculation used to determine Total Tenant Payment will not change, LMHA does not anticipate that this initiative will affect the amount of rent paid by any household.

At the family's request, LMHA staff will conduct a second verification of income and assets instead of relying solely on the PBV owner provided Tenant Income Certification form. LMHA will monitor the volume of such requests and the frequency with which they result in a material change to household income or assets.

Should a significant percentage of secondary reviews conducted by LMHA result in a material change to household income or assets, the Housing Authority will evaluate whether additional training of PBV unit management staff could remedy the situation; whether LMHA staff could rely on certain information contained in the Tenant Income Certification form while conducting independent verification of other data points; or if the use of the Tenant Income Certification form should be discontinued altogether.

2) *Hardship Case Criteria*

At the family's request, LMHA staff will conduct a second verification of income and assets instead of relying on the PBV owner provided Tenant Income Certification form. Families will also have recourse through the Housing Authority's informal hearing process.

3) *Description of Annual Reevaluation of Rent Reform Activity*

This rent reform initiative will be reevaluated annually by LMHA using the benchmarks and metrics discussed above. The Housing Authority will also consider the volume of resident requests for LMHA staff to conduct secondary reviews of household income and assets, and the percentage of secondary reviews that result in a material change to household income or assets. Finally, LMHA

will take into account community input received during the MTW Annual Plan public comment period and public hearing.

4) *Transition Period*
The Tenant Income Certification form will be used for PBV units that also have low-income housing tax credits upon execution of the HAP contract.

Activity #49-2018: Beecher Terrace CNI Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing

A. Description

HUD awarded LMHA a $29,575,000 Choice Neighborhoods Initiative (CNI) Implementation Grant in December 2016 for the revitalization of the Beecher Terrace public housing development and the wider Russell neighborhood. All buildings on the current Beecher Terrace site will be razed and replaced with a vibrant, sustainable mixed-income, mixed-use community.

Current Beecher Terrace households will be relocated in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), as described at 49 CFR Part 24, and in accordance with Section 104(d) of the Housing and Community Development Act, whose requirements are specified at 24 CFR Part 42. Post-revitalization, relocated Beecher Terrace households will receive a lifetime admission preference for both on-site and off-site replacement units.

Today's Beecher Terrace includes 758 public housing dwelling units that together contain 1,317 bedrooms. Per the Housing Authority's CNI Implementation Grant Agreement with HUD, LMHA must replace **all 1,317 bedrooms** currently on the site by September 30, 2023. LMHA has further committed to replacing **all 758 units** on the site, ensuring that the same number of households residing at Beecher today will be housed post-revitalization.

The CNI Transformation Plan calls for the construction of 316 replacement units on the existing Beecher Terrace footprint and the provision of 442 replacement units off-site. Off-site, the replacement units must be located either in the targeted Russell neighborhood or in non-impacted census tracts,[3] and they must be affordable to low-income families for a minimum of 40 years. Off-site developments must also meet two additional criteria designed to ensure that replacement housing is located in mixed-income developments:

- Replacement units must be located in developments where no more than half of units receive direct, ongoing operating subsidy; and
- They must be located in developments where at least 20% of the units are available to households with incomes above 60% of Area Median Income (AMI).

LMHA anticipates that most (if not all) of the 442 off-site replacement units will be subsidized through the Housing Authority's Local Project-Based Voucher (PBV) Program. LMHA plans to launch a competitive process during early FY 2018 to solicit PBV proposals from local developers and property owners who wish to provide Beecher replacement units at their properties. While LMHA believes that there will be a strong response from local developers and owners interested in project-based assistance for their developments (The Housing Authority has never made PBV assistance available before, and the level of interest already expressed by developers leads us to believe that there is significant pent up demand), the provision of such a large number of Beecher Terrace replacement units by September 30, 2023 will be a challenge, and the Housing Authority

[3] A "non-impacted census tract" is a census tract in which the poverty rate is below 40% and the minority concentration is no more than 20% higher than that for the MSA as a whole.

has no interest in waiting to see if the private market will fully accomplish this task. LMHA would also like to hasten the pace with which PBV units come on-line, so that families relocating from the Beecher site can move directly into permanent replacement units.

To this end, LMHA is actively pursuing opportunities to acquire properties where the Housing Authority can provide off-site replacement housing itself without relying on a 3rd-party developer or owner, and has already obtained site control for two turnkey four-plexes (eight units in total) in the Russell neighborhood. As these units are move-in ready, their acquisition would provide immediate relocation options for Beecher Terrace residents in their current neighborhood.

Absent the CNI requirement - and LMHA's commitment – that replacement housing be provided in mixed-income developments, the Housing Authority could simply acquire the eight units described above and use all of them as replacement units. In fact, in high income neighborhoods where the provision of affordable housing units would actually increase the area's income mix, LMHA is seeking the CNI Office's approval to count up to 100% of units within a given development as replacement units. However, in a high poverty neighborhood like Russell, where affordable, assisted housing is already the norm, using 100% of the units within a given project as replacement housing would simply perpetuate the status quo.

The challenge then becomes how to structure the financing of the acquisition in such a way that at least half of the units will not receive direct, ongoing operating subsidy and at least 20% of the units will be available to households with incomes above 60% of AMI.

Since half of the units cannot receive direct, ongoing operating subsidy, they must be purchased outside of Section 8 and Section 9. The only way for LMHA to accomplish this goal is through the exercise of MTW Broader Use of Funds authority, which would allow the Housing Authority to acquire the unsubsidized units outside of Section 8 and Section 9 using MTW Single Fund dollars, provided the purchased units are restricted to households whose income does not exceed 80% of AMI.

In this context, the application of Broader Use of Funds authority serves two purposes that promote mixed-income development - the use of this authority allows LMHA to purchase units that do not receive direct, ongoing operating subsidy, and it allows the Housing Authority to make these units available to households who income is greater than 60% of AMI (but does not exceed 80% of AMI).

Once purchased, LMHA recognizes that without the ongoing subsidy that would be provided through either Section 8 or Section 9, these units will rely solely on rental income to cover future costs. Thus, setting a viable rent for these units becomes critical, especially since this rent must serve several purposes:

1. It must be high enough to cover ongoing operating and capital costs;
2. It must be low enough to be affordable to households whose incomes are at or below 80% of AMI; and
3. It must be competitive when compared to other market-rate rents in the neighborhood.

In the case of the two 4-plexes already slated for acquisition, a preliminary analysis by LMHA staff, which examined the ongoing costs of similar scattered site public housing units and considered a neighborhood market study conducted as part of the CNI Planning process, indicates that achieving this rental rate "sweet spot" is feasible. According to the market study, typical

market rate rents in Russell are "slightly above LIHTC 60% AMI levels," an amount high enough to fund ongoing operating costs, but low enough to be affordable to low-income families.

LMHA views the acquisition of the two Russell neighborhood 4-plexes as a pilot project to determine whether this unique approach to the provision of mixed-income replacement housing developments is indeed feasible. Once the agency has "proof of concept," the Housing Authority plans to pursue additional acquisitions of this nature in furtherance of its CNI Transformation Plan commitments. Given the tight time restraints of the CNI Implementation grant, LMHA anticipates the pilot phase will last no more than one year.

Because this activity involves Broader Use of Funds authority, it meets HUD's definition of a "Local, Non-Traditional Activity." For this reason, the activity must be implemented in accordance with the requirements described in PIH Notice 2011-13, "Parameters for Local, Non-Traditional Activities under the Moving to Work Demonstration Program."

B. Relation to Statutory Objectives

This activity will improve the cost effectiveness of federal expenditures by leveraging MTW Single Fund dollars to create permanent affordable units that do not rely on direct, ongoing federal subsidy, while also increasing housing options for low-income families.

C. Anticipated Impact on the Stated Objectives

The activity's pilot, which involves the acquisition of two 4-plexes in the Russell neighborhood, will provide eight permanently affordable housing options for low-income families. Furthermore, ongoing federal subsidy of approximately $455 per unit month, which would otherwise be incurred for the four unsubsidized units (if these units were to be operated within Sections 8/9), will be avoided, a savings of approximately $21,840 annually.[5]

D. Anticipated Schedule for Achieving the Stated Objectives

Upon HUD approval of this activity, LMHA will exercise its current purchase agreement for the two 4-plexes located at 1506 and 1508 W. Market St., and immediately begin leasing.

E-I. Activity Metrics Information

LMHA plans to track the following HUD standard metrics for this activity (Baselines and benchmarks are based on the planned development of four local, non-traditional units during the activity's pilot phase):

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidies per	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.

[5] Estimated savings is based on the average monthly HAP payment for a 2-bedroom unit in the Housing Authority's tenant-based HCV Program.

household affected by this policy in dollars (decrease).	**As of FY 2017:** $5,460	$0	TBD	TBD
	Average annual HAP payment for a 2-BR HCV household prior to implementation of the activity.	Expected average annual subsidy for household residing in an affected non-traditional unit at FYE.	Actual average annual subsidy per household residing in an affected non-traditional unit at FYE	Explanation to be provided
Data Source(s): Emphasys; PHA financial records.				

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: $7,536 ($1,884 per household * 4 households)	$33,600 ($8,400 per household * 4 households)	TBD	TBD
	Total average annual Rent to Owner for four 2-BR HCV households prior to implementation of the activity.	Expected PHA rental revenue during FY (annualized).	Actual PHA rental revenue during FY (annualized).	Explanation to be provided
Data Source(s): Emphasys; PHA financial records.				

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline[1]**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
# of new housing units made available for HHs at or below 80% AMI as a result of the activity (increase). If units reach a specific type of HH, give that type in this box.	Housing units of this type prior to implementation of the activity (#). This # may be zero.	Expected housing units of this type after implementation of the activity (#).	Actual housing units of this type after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of 2017: 0	4	TBD	TBD
	Local, non-traditional units acquired/developed prior to implementation of the activity	Expected number of local, non-traditional units acquired/developed during FY	Actual number of local, non-traditional units acquired/developed during FY	Explanation to be provided
Data Source(s): PIC; Staff logs				

HC #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number (#) of households (HHs) able to move to a better unit &/or neighborhood	HHs able to move to a better unit &/or neighborhood of opportunity prior to implementation of the activity (#). This # may be zero.	Expected HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Actual increase in HHs able to move to a better unit &/or neighborhood of opportunity after implementation of the activity (#).	Whether the outcome meets or exceeds the benchmark.
	As of FY 2017: 0	4	TBD	TBD

of opportunity as a result of the activity (increase).	# of HHs moving to a local, non-traditional unit prior to implementation	Expected # of households moving to a local, non-traditional unit during FY	Actual # of households moving to a local, non-traditional unit during FY	Explanation to be provided
Data Source(s): Emphasys				

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	As of FY2017: $84.48 (4 HHs * 0.75 hrs per verification * $28.16 per staff hr)	$84.48 (4 HHs * 0.75 hrs per verification * $28.16 per staff hr)	TBD	TBD
	Total average annual cost of verifying income/assets for 4 HCV household prior to implementation of the activity.	Expected cost of verifying income/assets for affected units during FY	Actual cost of inspecting and verifying income/assets for PBV units during FY	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

J-K. Authorizations Cited and Explanation

Attachment D, which provides that LMHA "may use MTW Funds to provide housing assistance for low-income families, as defined in section 3(b)(2) of the 1937 Act, and services to facilitate the transition to work, whether or not any such use is authorized by Sections 8 or 9 of the 1937 Act, provided such uses are consistent with other requirements of the MTW statute."

- This authorization is necessary to permit LMHA to use its MTW Single Fund to acquire and operate dwelling units outside of Sections 8 and 9, provided such units serve low-income families and comply with all MTW statutory requirements.

L. Information for Rent Reform

Not applicable. Because the units acquired through Broader Use of Funds authority will operate outside of Sections 8 and 9, this activity does not include rent reform.

IV. Approved MTW Activities: HUD Approval Previously Granted

A. Implemented MTW Activities

For each previously approved and ongoing activity, LMHA has provided:

1) The Plan Year in which the activity was first approved and implemented;
2) A description of the activity and an update on its status;
3) An indication of whether or not the Housing Authority anticipates any non-significant changes or modifications to the activity during the Plan Year; and
4) An indication of whether or not the Housing Authority anticipates changes or modifications to the metrics, baselines or benchmarks during the Plan year.

Within this Plan, implemented MTW activities have been grouped by topic area as follows:

A.1 Occupancy at Elderly/Disabled High Rise Developments
A.2 MTW Rent Policies (Non HCV Rent Reform Demonstration)
A.3 HCV Rent Reform Demonstration
A.4 Public Housing Development
A.5 Expanded Homeownership Opportunities
A.6 Local Leased Housing Program
A.7 Local, Non-Traditional Housing Programs

A.1 Occupancy at Elderly/Disabled High Rise Developments

By FY 2008, when LMHA implemented a local definition of "elderly" (Activity #10-2008), the agency had been experiencing decreased occupancy rates at several of its elderly/disabled-only sites for a number of years. Through a combination of MTW initiatives, LMHA has been able to increase the average occupancy rate for these developments from 90% at FYE 2007 to 94% at FYE 2016. Higher occupancy rates at these sites improve LMHA's operating revenues and achieve greater cost effectiveness, and increase housing choices for 0- and 1-bedroom qualified applicants age 55 to 61.

Local Definition of Elderly (Activity #10-2008)
This activity, proposed and implemented in FY 2008, has permitted LMHA to use the following local definition of "elderly": any family whose head of household, cohead, or spouse is age 55 or above. Within the Public Housing Program, this definition is only used to determine eligibility for occupancy at the Housing Authority's elderly/disabled high-rise towers. In all other public housing contexts, "elderly" begins at age 62.

LMHA had been experiencing decreased occupancy rates at its elderly and/or disabled high-rises prior to adopting a local definition of elderly for these communities. The MTW age criteria are used to determine eligibility for residency at Dosker Manor, Avenue Plaza, Will E. Seay Plaza (formerly Bishop Lane Plaza), and Lourdes Hall. Opening up these sites to non-disabled households between ages 55 and 61 has raised occupancy rates and increased the pool of one-bedroom and efficiency units available to these applicants.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Lease-Up Incentives for New Residents at Dosker Manor (Activity #23-2010)
LMHA proposed and implemented this activity in FY 2010; it gives lease-up incentives to new residents at Dosker Manor, an elderly/disabled high-rise located in downtown Louisville. New residents receive a waiver of the initial deposit and the first month's rent free. The incentives have successfully increased occupancy rates at the site. Dosker Manor's occupancy rate has increased from below 90% at the time the activity was implemented to 93% as of FYE 2016.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.2 MTW Rent Policies (Non HCV Rent Reform Demonstration)

The MTW Demonstration also allows LMHA to rethink other policies – like the rent policy for its Public Housing and HCV programs – to encourage families to work towards housing self-sufficiency. Alternate rent structures also ease the administrative burden on residents and the agency. As part of LMHA's rent reform goals, the Authority will continue to use HUD's Enterprise Income Verification (EIV) System in its day-to-day operations.

Elimination of the Mandatory Earned Income Disregard (Activity #32-2012)
Proposed and implemented in the FY 2012 Plan, LMHA eliminated the HUD Mandatory Earned Income Disregard from the calculation of total tenant payment for families who are in the Public Housing and HCV programs. This activity increases rent revenues and simplifies the rent payment calculation.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Standard Medical Deduction (Activity #8-2008)
Proposed and implemented in the FY 2009 Plan, disabled and elderly families are eligible to receive a $1,600 standard medical deduction. The deduction is not mandatory; if the families' health care costs exceed the $1,600 exemption, families may opt to have their expenses itemized. The cost reductions from this activity are administrative savings due to reduction in verifications and paperwork. The initiative covers families in both the Public Housing and the HCV program. Taken together, the Public Housing and HCV programs reduced the cost to process applicants and conduct rent calculations by approximately $45,899 in FY 2016. The activity has achieved greater cost effectiveness in federal expenditures.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Alternate Year Reexaminations (Activity #4-2007)
This activity allows LMHA to conduct a re-certification of elderly and disabled families in the Public Housing and HCV programs once every two years instead of annually.

In the HCV program, eligible households receive a full reexamination every odd numbered fiscal year. In even numbered years, families are required to complete a mini-recertification packet, which they return to the agency by mail. In the Public Housing program, each year 50% of eligible families receive a full reexamination of eligibility on the anniversary of their lease-up date.

This activity was proposed and implemented on schedule in FY 2008. Originally, the only households eligible for biennial recertifications were elderly families and disabled families where the head of household and/or spouse was age 55+. The activity was significantly amended in FY 2012 to include all disabled families, and HCV staff began conducting biennial recertifications for all disabled families that year. In the Public Housing Program, biennial recertifications for all disabled families did not begin until FY 2016.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Earned Income Disregard for Elderly HCV Families (Activity #6-2008)
This activity was proposed in the FY 2009 Plan and implemented that year. It gives a $7,500 earned income disregard to elderly families in the HCV Program whose only other source of income is their Social Security entitlement. While the disregard affects only a small number of families, it gives elderly families who do choose to work the ability to retain all of the earned income that falls below the threshold.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.3 HCV Rent Reform Demonstration

HCV Program - HUD/MDRC Rent Reform Demonstration (Activity #43-2015)
LMHA was selected to participate in a HUD-commissioned study to evaluate an alternative HCV rent reform policy (the "Study"). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that have been implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency;
- Simplify the administration of the HCV Program;
- Reduce housing agency administrative burden and costs;
- Improve accuracy and compliance of program administration;
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under current rules; and
- Improve transparency of the program requirements.

Only vouchers administered under the MTW Program are eligible for the Study. Non-MTW vouchers (i.e., Veterans Assisted Special Housing, Moderate Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and HUD Project-Based Vouchers are excluded from the Study, as are households receiving a biennial certification.

The Study is focused on work-able populations, and does not include Elderly Households, Disabled Households, or households headed by people older than 56 years of age (who will become seniors during the course of this long-term study). Households utilizing the childcare expense deduction for purposes of determining adjusted annual income, as well as households participating in Family Self Sufficiency and Homeownership programs, were not eligible for Study selection.

In addition, households that contain a mix of members: 1) with an immigration status that is eligible for housing assistance, and 2) with an immigration status that is non-eligible for housing assistance, are not included in the Study.

Finally, households receiving case management or supportive services through one of the Housing Authority's MTW Special Referral Programs are also excluded from the Study.

Study participants for both the Alternate Rent Group and the Control Group were randomly selected from the eligible voucher programs by a computer generated program. The Alternate Rent Group vouchers are being managed using the proposed policies. The Control Group vouchers are being managed using the LMHA's standard policies. Households selected for the Alternate Rent Group met with an LMHA Housing Specialist to review the Study and their specific calculation of Total Tenant Payments under both the traditional and Study policies. They then had a period of 30 days to consider whether to select to be excluded from the Study. Study enrollment was completed in December 2015, at which time 775 participants had been enrolled in the Alternate Rent Group and 1,037 in the Control Group. 221 clients opted to be excluded from the Study.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.4 Public Housing Development

LMHA's goal is to transform the aging portions of its physical housing stock in the coming years, replacing these developments with mixed income communities, while at the same time providing replacement units so that the overall number of public housing families served will not decrease. LMHA has implemented several initiatives (both MTW and non-MTW) designed to expedite the redevelopment process and to ensure that all new and newly acquired properties are energy-efficient and cost effective.

Simplification of the Public Housing Development Submittal (Activity#18-2009)
LMHA proposed and implemented this activity in FY 2009. It simplifies the proposal process for each acquired or developed public housing property. Twice yearly, LMHA also submits a six month report summarizing the agency's acquisition and development activities to the HUD Louisville Field Office. The activity has reduced the amount of time staff spends preparing development submittals and reduced the average length of time to close on a property.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Acquisition of Mixed-Income Sites for Public Housing (Activity #26-2011)
This activity was proposed and implemented in the FY 2011 Plan; however, the policy has not yet been used to acquire property at mixed-income sites. The activity authorizes LMHA to acquire units for public housing or vacant land for developing public housing without prior HUD authorization if HUD does not respond to LMHA's request for authorization within 10 days of the submittal date. All acquired properties will meet HUD's site selection requirements. LMHA will request approval of the HUD Field Office when a pending acquisition deviates from the selection requirements and/or at the discretion of the Executive Director. Copies of all required forms and appraisals will be maintained in the project file.

LMHA will utilize the regulatory flexibility provided by this activity in the event that HUD has not responded to LMHA's request for authorization within 10 days of the submittal date.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.5 Expanded Homeownership Opportunities

The agency continues to focus on expanding homeownership opportunities for low-income families in its Public Housing and HCV programs. LMHA has implemented several MTW policy changes to its HCV Homeownership Program.

Amount and Distribution of HCV Homeownership Assistance (Activity #3-2006)
This activity was proposed and implemented in the FY 2006 Plan. LMHA revised its HCV Administrative Plan to allow for the utilization of a two-bedroom payment standard for all one bedroom eligible HCV Homeownership households. The activity maintains the 110% of Fair Market Rent (FMR) local payment standard for census tracts that are not considered to be exception payment standard areas. In exception areas, 120% of FMR is used.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

HCV Homeownership Program – Exception Payment Standards (Activity #13-2009)
Proposed in the FY 2009 Plan and implemented that year, this activity adjusts payment standards for the HCV Homeownership Program to 120% of Fair Market Rent in high opportunity census tracts that LMHA has designated exception payment standard areas.

Exception census tracts are determined by analyzing 5-Year American Community Survey data published by the U.S. Census Bureau. When this activity was first implemented in FY 2009, an exception census tract was defined as one where the *Owner Occupied Median Value* was greater than **100%** of the same value for the Metropolitan Statistical Area (MSA) as a whole.

In FY 2008 (the year before this activity was implemented), no families purchased homes in exception payment standard areas, which at the time were set to 110% of Fair Market Rent. Between FY 2009 and FY 2015, a total of 13 families (an average of nearly two per year) purchased homes in exception census tracts. However, the vast majority of Homeownership Program participants (nearly 90%) were still purchasing houses in non-exception payment standard areas.

In order to boost participants' buying power in areas of opportunity, in FY 2016 LMHA increased the number of exception census tracts by re-defining the criteria to encompass any census tract where the *Owner Occupied Median Value* exceeded **80%** of the *Owner Occupied Median Value* for the Louisville MSA as a whole.

During FY 2017, five new homeowners purchased homes in exception census tracts (more than twice the historic average of two per year). The fact that all five purchases were in newly added exception census tracts is a promising indication that the activity's expansion will greatly improve the ability of households to acquire homes in neighborhoods of opportunity. FY 2017 data will be reported more fully in the Housing Authority's FY 2017 MTW Annual Report.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.6 Local Leased Housing Program

LMHA continues to look at its leased housing program to see what policy and program changes might strengthen communities and make them better places to live. Developing comprehensive initiatives in this area will continue to require regulatory relief.

LMHA has discussed its Special Referral Programs with HUD, specifically the issues related to resident choice, portability, term-limits, and voucher replacement, and will be in discussions with its Special Referral partners during FY 2018 to determine feasible alternatives to the current Special Referral Program structure. As a first step in this process, during FY 2018 LMHA will close out Activity #45-2016, the "Move Up" Special Referral Program with the Coalition for the Homeless.

Through the "Move Up" partnership, LMHA currently allocates up to 100 vouchers to formerly homeless families, allowing them to transition from homeless services vouchers to HCV vouchers, thus freeing up additional homeless services vouchers to serve currently homeless families. Upon further review of this activity, the Housing Authority has determined, with the MTW Office's concurrence, that this partnership can be continued without MTW authority through the provision of a "limited admission preference" to the agency's HCV Program.

This determination is based on a review of HUD guidance provided through PIH Notice 2013-15, "Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher programs," which makes the following provision on page 6:

> PHAs may create a preference or limited preference specifically for people who are referred by a partnering homeless service organization or consortia of organizations (for example, an organization that refers people transitioning out of a shelter, transitional housing program, or rapid re-housing program)…
>
> …A PHA may also have a preference for individuals and families transitioning, or "moving up," from Permanent Supportive Housing (PSH) units. These are persons that were previously homeless prior to entry into the PSH program but who no longer need that level of supportive services. While these persons would not be considered homeless for reporting purposes on the Form HUD 50058, creating such a "move up" preference will contribute significantly to the community's overall efforts to end homelessness by freeing up units for currently homeless families and individuals with disabilities who need housing combined with services.

LMHA will close out the "Move Up" activity during FY 2018, and report on final activity outcomes in its FY 2018 MTW Annual Report.

Special Referral MTW HCV Programs (Activity #44-2015)

Note: LMHA tracks standard metrics for all of its MTW Special Referral Programs jointly under the umbrella of this single master activity. Individual Special Referral Programs are referred to as "sub-activities"; however, many of these "sub-activities" were originally approved by HUD as individually numbered, standalone MTW activities.

Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. LMHA provides housing subsidy to HCV-eligible households, while the partnering agency provides social services support. The provision of services helps families make strides towards self-sufficiency, and the programs increase housing choices for low-income families who might otherwise have difficulty succeeding in the privately-managed real estate market.

Families are referred to LMHA by the partner agencies, and program applicants receive an admissions preference for the authority's HCV Program. Households are required to meet basic HCV eligibility criteria, and the amount of housing assistance each family receives is determined according to traditional HCV Program rules as modified through LMHA's HUD-approved MTW initiatives.

The voucher recipients participating in some of the agency's MTW Special Referral Programs are initially required to reside on-site and to meet the partner's program requirements. However, their voucher resumes full portability after they successfully graduate from the program. As a participant moves from the site, LMHA issues a voucher to the next eligible applicant. For other Special Referral Programs, the voucher is fully portable from the time of admission.

Many of the residential facilities operated by these Special Referral partners are newly constructed or renovated. As such, LMHA has used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HUD Housing Quality Standards (HQS) inspection. This substitution has saved the authority thousands of dollars since Louisville Scholar House first came online in 2008.

LMHA does not anticipate that any non-significant changes or modifications will be made to this master activity (#44-2015) during FY 2018. However, the Housing Authority will close out one "sub-activity" during FY 2018, the "Move Up" MTW Special Referral Program in partnership with the Coalition for the Homeless (Activity #45-2016). Activity #45-2016 is included in Section IV.D of this Plan ("Closed-Out MTW Activities"), and will officially be closed out through the Housing Authority's FY 2018 MTW Annual Report.

- **The Villager - Center for Women and Families (CWF) (Sub-Activity #1-2005)**
  Proposed and implemented in the FY 2005 Plan, LMHA allocates up to 22 vouchers to an MTW Special Referral Program with the Center for Women and Families for their long-term transitional housing on their downtown campus. Programs at the Center focus on the elimination of domestic violence, sexual violence, and economic hardship. Voucher utilization has remained 100%. This activity has increased housing choices and the cost effectiveness of federal funds.

- **Day Spring (Sub-Activity #7-2008)**
  This activity was initially proposed and approved in the FY 2009 Plan. It was tabled at the end of FY 2009 due to low voucher utilization, and then re-authorized under the FY 2012 Plan. LMHA provides housing assistance to up to four households with members who have a severe mental illness, as long as they initially reside at a Day Spring constructed unit, while they are participating in the program Day Spring, a faith-based charitable organization, provides residential and

supportive services to adults with developmental disabilities who want the opportunity to live independently in a supportive community setting. Under this initiative, not all of the residential units are subject to typical HUD HQS and rent reasonableness requirements.

- **Louisville Scholar House - Family Scholar House (formerly Project Women) (Sub-Activity #15-2009)**
  Proposed and implemented in the FY 2008 Plan, LMHA allocates up to 56 vouchers to a Special Referral Program with Family Scholar House for their Louisville Scholar House facility. These solo heads of households often face multiple barriers to furthering their education and obtaining employment that will provide their families with adequate income to become self-sufficient.

- **Downtown Scholar House - Family Scholar House with Spalding University (Sub-Activity #20-2010)**
  This activity was proposed in the FY 2010 Plan and implemented in FY 2011. The activity allocates up to 43 Housing Choice Vouchers annually to a Special Referral Program with the Family Scholar House and Spalding University at the Downtown Scholar House.

- **100,000 Homes Initiative (Sub-Activity #30-2012)**
  Proposed and approved in FY 2012, LMHA has set aside up to 50 vouchers for a Special Referral Program with the 100,000 Homes initiative of the Louisville Substance Abuse and Mental Health Services Administration (SAMHSA) Community Consortium. This activity increases housing choices and access to services for up to 50 of the most vulnerable homeless persons on the streets of Louisville Metro. Participants in this Housing First model program, who are identified and referred by the Louisville SAMHSA, must be chronically homeless.

- **Stoddard Johnston Scholar House - Family Scholar House (Sub-Activity #31-2012)**
  This activity was proposed and approved in the FY 2012 Plan. The activity sets aside up to 57 vouchers for a Special Referral Program with Family Scholar House for their new Stoddard Johnston Scholar House location.

- **Wellspring - Youngland Avenue Facility (Sub-Activity #34-2012)**
  This activity was proposed and approved in the FY 2012 Plan and implemented in FY 2012. The activity establishes a Special Referral Program to provide housing assistance to up to five households with members with severe mental illness, as long as they initially reside at Wellspring's Youngland Avenue facility, while they are participating in the program. Wellspring is a charitable organization that addresses Louisville's need for supportive housing for adults with severe and persistent psychiatric illnesses. Referrals accepted for this initiative are considered to be Mainstream Program participants.

- **Wellspring – Bashford Manor / Newburg Facility (Sub-Activity #36-2013)**
  This activity was proposed in the Amended FY 2012 Plan and implemented in FY 2012. The activity establishes a Special Referral Program that provides housing assistance to up to eight households with members with severe mental illness, as long as they initially reside at Wellspring's Bashford Manor / Newburg facility, while they are participating in the program. Referrals accepted for this initiative are considered to be Mainstream Program participants.

- **Parkland Scholar House - Family Scholar House (Sub-Activity #38-2013)**
  This activity was proposed and approved through in FY 2013. The activity sets aside up to 53 vouchers, including five vouchers for participants who reside off-campus, for a Special Referral

Program with Family Scholar House at their Parkland Scholar House facility. Vouchers become portable upon graduation.

- **Centerstone (Formerly Seven Counties Services, Inc.) Initiative (Sub-Activity #42-2015)**
  Proposed and approved in FY 2015, LMHA set aside 50 vouchers to a Special Referral HCV program with Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices and access to services for 50 families referred through Centerstone's Assertive Community Treatment (ACT) team. Assertive Community Treatment is an Evidenced Based Practice approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) and designed to engage persons with a Severe Mental Illness (SMI) whose needs are not met by traditional outpatient services. Services are delivered in the context and environment where they are needed (i.e. the team goes to the person). The priority population is adults with a severe mental illness who are currently institutionalized at a personal care home or at risk of being institutionalized because of a lack of adequate community support. Lack of on-site support is one of the primary reasons this priority population has been unsuccessful in achieving sustained psychiatric stability in the past. Assertive Community Treatment fills this gap, and assists the program participants in achieving and maintaining community integration. Those persons originally from Jefferson County but placed in a personal care home in another region of the State will be considered for return to the Louisville area.

- **Riverport Scholar House - Family Scholar House (Sub-Activity #46-2017)**
  Proposed and approved in FY 2017, the activity sets aside up to 64 vouchers for a Special Referral Program with Family Scholar House at their new Riverport Scholar House facility. Vouchers become portable upon graduation.

- **ChooseWell Communies, Inc. (Sub-Activity #47-2017)**
  Proposed and approved in FY 2017, LMHA expanded its successful existing partnership with ChooseWell Communities' Thrive Program, which assists families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance. In FY 2016, LMHA allocated up to 10 vouchers to this program; this was increased by 60 vouchers in FY 2017.

- **Allocate MTW Housing Choice Vouchers to Special Referral Programs (Sub-Activity #35-2012)**
  Proposed and approved in FY 2012, LMHA may, without prior HUD approval, allocate up to 10 MTW Housing Choice Vouchers to an MTW Special Referral Program for service-enriched, affordable housing programs within the agency's jurisdiction. Eligible programs will offer housing and supportive services targeted to families whose needs are not adequately served elsewhere in the community. Some allocations may be incremental additions to existing Special Referral Programs while others will be allocations to newly established programs.

  <u>FY 2012</u>
  - Up to 10 vouchers to Coalition for the Homeless for homeless families with children.

  <u>FY 2013</u>
  - Up to 10 additional vouchers to the Coalition for the Homeless for homeless families with children; and

  <u>FY 2014</u>

- Up to 4 vouchers to Choices, Inc. to provide permanent supportive housing for homeless families, including case management.

FY 2016

- One additional voucher to Choices, Inc. to provide permanent supportive housing for homeless families, including case management;
- Up to 10 vouchers to Wellspring for families with members with severe mental illness who are exiting Wellspring's Ardery House facility for permanent housing. These vouchers are only issued to households that are not eligible for an Olmstead voucher. Wellspring continues to provide case management / peer specialist services to all clients utilizing these vouchers.
- Up to 10 vouchers to the Kentucky Housing Corporation. These vouchers are available to low-income households where a family member meets one of the following criteria:
    1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals
    2. Persons with severe mental illness who are at risk of institutionalization
    3. Persons with disabilities exiting nursing homes and intermediate care facilities for individuals with intellectual or other developmental disabilities
- Up to 10 vouchers to ChooseWell Communities' Thrive Program to assist families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance.

FY 2017

- Up to 10 vouchers to Family & Children's Place for Olmsted-eligible families participating in the organization's Homeless Prevention Program, which serves families that include at least one individual who is leaving an institution and is also at risk of homelessness. This population includes individuals leaving prison after being paroled or serving out their sentence; individuals who have aged out of foster care; and individuals who have a high rate of hospitalization due to a Severe Mental Illness. Participants receive case management.

FY 2018

- During FY 2018, LMHA plans to allocate up to 10 vouchers to St. Vincent DePaul's Transitional Housing Program, which assists families with children, where the family is either homeless or at risk of becoming homeless, combining housing support with case management services. Participants will initially reside at 1015-A S Preston Street; however, vouchers remain fully portable. Inspections will be conducted with each new occupant and once per year concurrently.
- During FY 2018, LMHA also plans to allocate up to 10 vouchers to the House of Ruth to assist individuals who are homeless and HIV-positive, combining housing with wraparound social service support services, including:
    - A safe, drug and alcohol-free community living environment;
    - Intensive case management;
    - Group and individual mental health counseling;
    - Intensive outpatient substance abuse treatment;
    - Life skills education; and
    - Transportation assistance.

  Special Referral Program participants will be required to live at the House of Ruth's Glade House, a single-room occupancy facility for two years, after which time vouchers become fully portable. Inspections will be conducted with each new occupant and once per year concurrently.

LMHA Special Referral MTW Voucher Programs
Fiscal Year 2018

Organization	Site	Voucher Allocation	FY Proposed	FY First Voucher Issued	Portable? *Term Limited?*	Streamlined Admission?	MTW Inspections?
100K Homes Initiative	N/A	50	2012	2012	Full portability.	No	No: Traditional inspection protocol.
Center for Women and Families	Villager	22	2005	2005	Full portability upon program completion.	Yes	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and once per year concurrently.
Centerstone	N/A	50	2015	2015	Full portability.	No	No: Traditional inspection protocol.
Choices, Inc.	Choices owned units	5	2014	2014	Full portability.	No	No: Traditional inspection protocol.
ChooseWell Communities	N/A	60 in 2016 + 10 in 2017	2016, 2017	2016	Full portability.	No	No: Traditional inspection protocol.
Coalition for the Homeless	N/A (Rapid Re-housing)	20	2012	2013	Full portability.	No	No: Traditional inspection protocol.
Day Spring	Day Spring constructed units	4	2009	2009, 2012*	Full portability.	Yes	No: Traditional inspection protocol.
Family & Children's Place	N/A	10	2017	2017	Full portability.	No	No: Traditional inspection protocol.
Family Scholar House	Louisville	56	2008	2008	Full portability upon program completion.	No	Yes: For initial lease-up, C.O. is used. After initial move-in, with new occupant and once per year concurrently.
	Downtown	54	2010	2011			
	Stoddard Johnston	57	2012	2012			
	Parkland + 5 off-site	53	2012 Amended	2012			
	Riverport	64	2017	---			
House of Ruth	Glade House	10	2018	---	Full portability after two years.	No	Yes: Inspection with new occupant and once per year concurrently.
Kentucky Housing Corporation	N/A	10	2016	2016	Full portability.	No	No: Traditional inspection protocol.
St. Vincent dePaul	1015-A S. Preston St.	10	2018	---	Full portability.	No	Yes: Inspection with new occupant and once per year concurrently.
Wellspring	Youngland Avenue	5	2012	2012	Full portability.	Yes	No: Traditional inspection protocol.
	Bashford Manor/Newburg	8	2012	2013		No	
	N/A	10	2016	2016		No	

*Referral program suspended during FY2010 and FY2011.

MTW Unit Inspection Protocol (Activity #2-1999)
Unit inspections of facilities at LMHA's Section 8 certificate programs that are managed by organizations with which the Agency has had a long-term and outstanding relationship, are waived upon initial occupancy and held once per year concurrently. Section 8 certificate programs include YMCA SRO, Roberts Hall and St. Vincent de Paul, and Willow Place. These facilities have been receiving assistance for over 10 years. This activity has significantly reduced costs to inspect the units "tied" to these programs. In 2013, LMHA began inspecting units at Villager at the Center for Women and Families once per year, concurrently. At the time of initial occupancy by voucher holders, the units were new and had achieved certificate of occupancy issued by Louisville Metro inspectors.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Amend HCV Admissions Policy to Allow for Deduction of Child-Care Expenses in Determination of Eligibility (Activity #27-2011)
This activity was proposed and implemented in FY 2011, and allows for the deduction of verified ongoing child-care expenses from a working household's gross income when determining income eligibility. In order to qualify for the adjustment, the family must include a head of household, co-head, and/or spouse with a demonstrated work history for a period of 12 months or longer. While this activity was designed to increases housing choice for working families with children who may be struggling to make ends meet, LMHA has determined that it also achieves the HUD Standard metrics of "Reducing the per Unit Subsidy Costs" for participating households and "Increases Agency Rental Revenue."

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

HCV Program Rent Increase Limit (Activity #39-2014)
This activity was proposed and implemented in FY 2014. It places a 2% cap on annual contract rent increases for units where the tenant is already receiving HCV rental assistance. At contract renewal, LMHA limits the landlord's requested rent to whichever is least: 102% of the previous contract rent for the same tenant; the (exception) payment standard; or to the rent as determined through a rent reasonableness analysis.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

A.7 Broader Use of Funds Initiatives

Accessible Units Sublease Agreement with Frazier Rehab Institute (Activity #37-2014)
This activity was proposed and implemented in FY 2014, and allows LMHA to sublease fully accessible units as temporary housing for Spinal Cord Injury (SCI) out-patients of Frazier Rehab Institute. The units are transitional housing provided for up to six months per family. Frazier Rehab Institute is responsible for verifying that the family is eligible to live in the unit (e.g., a program participant, household income is at or below 80% AMI). Two fully-accessible units located at the Liberty Green Community Center are dedicated to this activity. The Community Center is ideally located one-half mile from the Frazier Rehab Institute. Frazier Rehab leases the apartments from LMHA and pays the cost of all utilities. Rent to Frazier Rehab is set at $210 per month (or roughly 30% of monthly SSI for one person), and Frazier Rehab has agreed to pass on no more than 100% of the rent plus utilities to the tenant (the sub lessee). Frazier Rehab uses a modified version of LMHA's public housing lease as its tenant sublease and has established a hardship policy to define circumstances under which households may be exempted or temporarily waived from the rent Frazier Rehab may charge to the sub lessee. Examples could include involuntary loss of income or unexpected medical expenses. Frazier Rehab also refers sub lessees to area service providers, including the Center for Accessible Living (Kentucky's first Independent Living Center), who can assist households with leaving the program.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

Public Housing Sublease Agreement YouthBuild Louisville (Activity #29-2015)
This activity was proposed and implemented in FY 2015; it allows YouthBuild Louisville (YBL) to sublease public housing units to provide temporary housing for low-income YBL participants who are experiencing homelessness. LMHA subleases up to three 2-bedroom apartments for the use of YBL participants (and their families) and facility space for the YBL program. Units are provided to YBL on an as needed basis.

For unemployed young people who left high school without a diploma, YBL is an opportunity to reclaim their educations, gain the skills they need for employment, and become leaders in their communities. YBL serves low or very-low income youth, ages 16-24, who have dropped out of high school or are basic skills deficient, and, are a foster care recipient or have aged out of care, and/or a youthful or adult offender, a youth possessing a disability and/or a child of an incarcerated parent or a migrant youth. They are trained in small cohorts of 35 youth each year with one additional year of job placement, higher education assistance, community mentoring, and social service support. Youth receive individual and group education to complete their GED and/or high school diploma and pre-college curriculum, while all gain construction skills through the Homebuilders Institute Pre Apprenticeship Certificate Training (PACT) with additional elective certification in green construction, weatherization and facilities maintenance, and pre-nursing certification through the American Red Cross and Norton Healthcare.

Participant housing is not a traditional component of the YBL program. For many students, maintaining stable housing is not a struggle; however some participants are homeless or may become homeless. The sublease agreement between YBL and LMHA ensures that these young people have a place to call home so they are able to make the most of this unique learning opportunity.

For each month a unit is occupied by an YBL program participant, YBL pays LMHA $60. YBL certifies that students are income eligible upon entry to the YBL program through the application process and

follow-up verification through local and state subsidy programs. The participant and their household may continue to live in the unit as long as they are active in the YBL program. Upon graduation, the household may elect to receive preference for either a public housing unit.

All participants residing in the subleased public housing units must meet basic Public Housing Program eligibility criteria (no outstanding rent balance with LMHA or other public housing authority, criminal background check, age 18 or older). LMHA staff verifies that the YBL program participant is eligible for this MTW initiative.

This activity increases housing choices for families enrolled in self-sufficiency programs. It uses public housing as an incentive for young people to enroll in the YBL job training program, which increases their chances of becoming self-reliant.

LMHA does not anticipate that any non-significant changes or modifications will be made to this activity during FY 2018, nor does the agency expect that any changes or modifications will be made to the metrics, baselines, or benchmarks used to measure its effectiveness.

B. MTW Activities Not Yet Implemented

Develop Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing (Activity #28-2011)

This activity was proposed in FY 2011. The activity is to explore using MTW authority to create locally defined guidelines for the re/development, maintenance, and modernization of public housing. LMHA plans to develop reasonable and modest design guidelines, unit size guidelines, and unit amenity guidelines for new and ongoing public housing development activities. The criteria will focus on strategies for developing sustainable housing, preserving affordable housing, and developing low-income housing in low-concentration, non-impacted areas of the agency's jurisdiction. Strategies include rehabilitation and new construction standards that reduce energy consumption, including Energy Star criteria, and that increase the supply of accessible housing in the community.

There have been no non-significant changes or modifications to this activity since its approval. Planning for this activity will be ongoing during FY 2018 in conjunction with the Housing Authority's Choice Neighborhoods Initiative efforts for the Russell neighborhood and the Beecher Terrace public housing development. As part of this process, LMHA is examining innovative ways to provide one-for-one replacement of the 758 Beecher Terrace public housing units, including the potential use of locally defined guidelines for the development, maintenance, and modernization of public housing. Any locally defined guidelines resulting from the Choice process would be officially proposed to HUD as an amendment to this Plan.

C. MTW Activities On Hold

Public Housing Sublease Agreement with Catholic Charities (Activity #25-2010)
Proposed and approved in the FY 2010 Plan, this activity has been tabled. HUD OGC investigated the use of public housing as emergency housing for victims of human trafficking and found that it was not feasible under MTW to permit families who could not produce valid identification to live in public housing communities. During FY 2018, LMHA will continue to investigate both MTW and non-MTW methods for serving this extremely vulnerable population.

D. Closed-Out MTW Activities

Spatial Deconstruction of HCV Assisted Units (Activity #5-2007)
LMHA proposed this initiative in the 2007 Annual Plan and it was approved by HUD. The activity was to limit the concentration of Housing Choice Voucher assisted units in complexes of one hundred or more units to 25% (excluding both elderly/disabled and special referral program sites). This activity was closed at fiscal yearend 2009 because of its potential to limit voucher holders' universe of housing choices.

Public Housing - Term Limits and Employment/Education Requirements for New Scattered Sites (Activity #9-2007)
Proposed and implemented in FY 2007, this activity revised the occupancy criteria for detached, single family, scattered site units to include 5-year residency term limits and employment/education requirements for admission and ongoing occupancy. Due to continued low occupancy rates at these sites, the activity was revised in FY 2016 to remove the 5-year residency term limit; however, this change did not increase occupancy rates to levels LMHA deemed acceptable. LMHA stopped enforcing the employment/education requirements associated with these units effective April 1, 2017, and will formally close out this activity in the FY 2017 Annual Report, reporting final outcomes and lessons learned at that time.

Flexibility in Third-Party Verifications for HCV Homeownership (Activity #11-2009)
Proposed and implemented in the FY 2009 Plan, applicants to the HCV Homeownership program are allowed to provide income verification including employment verification from employer, child support verification, statements for all bank accounts, proof of CDs at the bank, pension plan verification and proof of all medical costs including prescriptions. Also, income verification is valid for eight months. Cost savings through the elimination of staff time spent obtaining verifications and conducting reviews has been achieved.

LMHA has determined that due to a recent change in HUD regulations MTW authority is no longer necessary to achieve a portion of this activity. This portion of the activity was ended in FY 2014. LMHA will continue to seek regulatory relief for making income verifications valid for eight months.

Explore HUD's Streamlined Demolition and Disposition Application Process for MTW Agencies (Activity #16-2009)
Proposed and approved in the FY 2009 Plan, this activity was never implemented. HUD investigated the possibility of streamlined demolition/disposition activities for MTW agencies but found that it was not feasible under MTW. Out of concern for residents' rights and the public process, HUD decided that MTW agencies must follow the established procedures for demolition and disposition of property.

Occupancy Criteria Changes for New Scattered Sites – Mandatory Case Management (Activity #21-2010)
Proposed and implemented in FY 2010, this activity revised the occupancy criteria for detached, single-family scattered site units to include mandatory participation in a case management program and movement toward self-sufficiency. Residents moving into one of these units could choose between General Case Management and the Family Self-Sufficiency (FSS) Program.

Due to low occupancy rates at these sites, this activity was closed out in early FY 2016.

Increased Flat Rents (Activity #24-2010)
LMHA proposed this initiative in the 2010 Annual Plan and it was approved by HUD. LMHA proposed flat rents for the Agency's scattered sites be raised and adjusted based on the square footage, location, age and amenities at the property as rent comparables for the site are completed. LMHA will not implement this activity in lieu of adopting the MTW policy total tenant payment is calculated based on 30% of income, which was approved in FY 2012 and marked the "close out" of the Flat Rent Activity.

Rents Set at 30% of Adjusted Income – Public Housing Program (Activity #33-2012)
Proposed and implemented in the FY 2012 Plan, families receiving rental assistance under the Public Housing program will pay either 30% of their monthly adjusted income for rent, or the minimum rent established by the LMHA, whichever is higher.

In 2012, LMHA proposed to eliminate flat rents and, upon further consideration, because the Authority's housing stock includes units financed with tax credits, LMHA is considering an amendment to the activity. LMHA may amend the activity to include "ceiling rents" that will vary by bedroom size and that will be in accordance with the annual tax-credit ceiling rents, as published by the Kentucky Housing Corporation (KHC). KHC is the tax credit allocating agency for the Commonwealth of Kentucky. The proposal to change this activity will be made via a future Plan amendment including the planned ceiling rents and the associated impact analysis as required by the Agency's Standard MTW Agreement with HUD.

In 2014, LMHA decided not to pursue this activity. Instead, the Agency revised its flat rent structure. LMHA anticipates that higher flat rents will achieve the goals of the proposed activity within HUD's existing regulatory framework.

MTW Special Referral Program – Coalition for the Homeless "Move Up" Initiative (Activity #45-2016)
Proposed and implemented in FY 2016, the "Move Up" Special Referral Program in partnership with the Coalition for the Homeless allocates up to 100 vouchers to formerly homeless families, allowing them to transition from homeless services vouchers to HCV vouchers, thus freeing up additional homeless services vouchers to serve currently homeless families. Upon further review of this activity, the Housing Authority, with MTW Office concurrence, has determined that this partnership can be continued without MTW authority through the provision of a "limited admission preference" to the agency's HCV Program.

This determination is based on HUD guidance provided through PIH Notice 2013-15, "Guidance on housing individuals and families experiencing homelessness through the Public Housing and Housing Choice Voucher programs," which makes the following provision on page 6:

> PHAs may create a preference or limited preference specifically for people who are referred by a partnering homeless service organization or consortia of organizations (for example, an organization that refers people transitioning out of a shelter, transitional housing program, or rapid re-housing program)…
>
> …A PHA may also have a preference for individuals and families transitioning, or "moving up," from Permanent Supportive Housing (PSH) units. These are persons that were previously homeless prior to entry into the PSH program but who no longer need that level of supportive services. While these persons would not be considered homeless for reporting purposes on the Form HUD 50058, creating such a "move up" preference

> will contribute significantly to the community's overall efforts to end homelessness by freeing up units for currently homeless families and individuals with disabilities who need housing combined with services.

LMHA will close out the "Move Up" activity during FY 2018, and report on final activity outcomes in its FY 2018 MTW Annual Report.

V. Sources and Uses of Funds

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	**FDS Line Item Name**	**Dollar Amount**
70500 (70300+70400)	Total Tenant Revenue	6,955,000
70600	HUD PHA Operating Grants	101,016,128
70610	Capital Grants	0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	69,332
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	294,000
70000	**Total Revenue**	108,334,460

Estimated Uses of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.		
Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	7,317,309
91300+91310+92000	Management Fee Expense	5,733,356
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	608,066
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	6,951,642
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	12,535,008
95000 (95100+95200+95300+95500)	Total Protective Services	1,086,053
96100 (96110+96120+96130+96140)	Total Insurance Premiums	813,817
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	284,656
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	0
97100+97200	Total Extraordinary Maintenance	6,166,600
97300+97350	Housing Assistance Payments + HAP Portability-In	63,392,106
97400	Depreciation Expense	4,421,107
97500+97600+97700+97800	All Other Expenses	0
90000	Total Expenses	109,309,720

In the "Sources and Uses of Funds" tables provided above, the Housing Authority's uses for FY 2018 appear to exceed sources by $975,260. This is due to the "Depreciation Expense" of $4,421,107 listed in the Uses table for FDS line item 97400. Depreciation expense is a non-cash item (book entry) that is requested in the table, but that does not represent actual funds the agency plans to expend during FY 2018.

The depreciation expense of $4,421,107 is partially offset by a projected operating surplus of $3,445,847 (contained entirely in the HCV Program). Subtracting the projected operating surplus ($3,445,847) from the depreciation expense ($4,421,107) results in the perceived deficit of $975,260.

However, this apparent deficit is not representative of the agency's true, balanced budget for FY 2018. Instead, it is a function of the required format in which the data must be presented.

Describe the Activities that Will Use Only MTW Single Fund Flexibility
Planned Uses of MTW Single Fund Flexibility, Including Reserves: • Approx. $5,218,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall of $1,545,000 in the Public Housing program for calendar year 2017 and 2018, and the continued ability to operate AMPs at a high level and maintain a balanced operating budget. The HUD approved project expense levels (PEL) at some AMPs do not adequately provide for management services at the level deemed necessary by LMHA. • Although LMHA has traditionally made transfers to the public housing program from both the CFP program and Section 8 program in past years, the proposed budget year's transfer is made entirely from the Section 8 program. However, LMHA retains the authority and flexibility to transfer CFP funds as necessary under current MTW regulations. • Although LMHA utilizes the funding fungibility available through the MTW Program, all budgeting and reporting within the public housing program is done on an individual site basis, and LMHA utilizes a "fee for service" methodology that charges sites only for the services they receive. Please note that LMHA has submitted a Local Asset Management Plan (LAMP) to HUD for approval (see Appendix I). Should the proposed LAMP be approved, it may be implemented during FY 2018.
• Approx. $4,000,000 to acquire and/or develop replacement units to offset units that have been lost through demolition or disposition (See Housing Stock Information tables in Section II for additional information regarding the development of replacement units.). • Approx. $29,450,000 to supplement the Choice Neighborhoods Initiative (CNI) Implementation grant for the revitalization of Beecher Terrace and the wider Russell neighborhood for activities both on the Beecher Terrace footprint and off-site, including but not limited to the provision of replacement housing, in a manner consistent with the goals and objectives described in the CNI Transformation Plan. • Approx. $2,500,000 to acquire a new facility to house LMHA's Section 8 offices (In last year's Annual Plan, this item was budgeted as replacement of chillers and boilers at Vine St. LMHA has decided it would be more prudent to seek a new facility.) • Approx. $650,000 to acquire 108 units and retire related debt on a HOPE VI tax-credit project that will soon reach the end of its tax-credit compliance period (Park DuValle III). • Approx. $50,000 to provide educational scholarships to public housing and/or Section 8 residents.
Additionally, MTW single flexibility may be used in the case of: • Emergencies and catastrophic events • Funding shortfalls • Operating deficits • To provide adequate cash flow when receipt of federal subsidy is delayed • To increase housing inventory (Section 8 Vouchers) • To provide gap financing in mixed-finance projects

Activities that only use MTW Single Fund Flexibility are no longer individually numbered. The activities listed below were developed before this change was made.

Homeownership Maintenance Specialist (Activity #12-2009)
This activity was proposed and approved in FY 2009, but has not yet been implemented. LMHA plans to restructure the current homeownership inspection, training, and consultation process (these 3 duties are currently split among different individuals) and instead steer all of these tasks through a Home Maintenance Specialist (HMS). Annually, LMHA evaluates staff capacity to perform these duties. The Housing Authority may hire an HMS during FY 2018, should the agency determine this would be beneficial.

MultiCultural Family Assistance Program (Activity #17-2009)
This activity was proposed in FY 2008 and implemented in FY 2012. Louisville continues to experience a growing demand from Somali and other African immigrant families living within its jurisdiction for housing and supportive services. LMHA has hired a staff person who is knowledgeable about this community and who can interpret and translate for families that speak several dialects commonly used in Somalia. This staff person is able to address the unique needs of African immigrant families, with the added benefit of helping the agency with property management, operations, and lease enforcement.

HCV Homeownership Weatherization and Energy Efficiency Pilot (Activity #19-2010)
This activity has been closed out.

Avenue Plaza CFL Trade-in Program (Activity #22-2010)
This activity has been closed out.

V.2.Plan.Local Asset Management Plan			
B. MTW Plan: Local Asset Management Plan			
Is the PHA allocating costs within statute?	Yes	or	
Is the PHA implementing a local asset management plan (LAMP)?		or	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?		or	No

VI. Administrative

A. Board Resolution Adopting the Annual Plan

RESOLUTION NO. 45-2017 (4/18/17)

APPROVAL OF FY 2018 MOVING TO WORK ANNUAL PLAN

Item No. 5h

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville, executed a Moving to Work (MTW) Agreement with the U.S. Department of Housing and Urban Development (HUD) on August 2, 1999 and an Amended and Restated Agreement on April 15, 2008, which provides LMHA the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the Amended and Restated MTW Agreement, an MTW Annual Plan for Fiscal Year 2018 must be developed and submitted to HUD to formally enable the Housing Authority to fully use the policy and budget flexibility provided to public housing agencies participating in the MTW Program; and

WHEREAS, a Board Resolution approving the proposed FY 2018 MTW Annual Plan and required Certifications of Compliance must be included in the submission provided to HUD; and

WHEREAS, the proposed FY 2018 MTW Annual Plan was made available for public comment from March 17, 2017 through April 17, 2017, and a public hearing was held on March 28, 2017, to discuss the proposed FY 2018 MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2018 MTW Annual Plan is approved, and that the Executive Director and Contracting Officer, Tim Barry, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development; and

BE IT FURTHER RESOLVED that Board Chair Manfred Reid is hereby authorized to sign the required FY 2018 MTW Annual Plan Certifications of Compliance.

cc: Tim Barry
Wavid Wray
J Sarah Galloway

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2018 MOVING TO WORK ANNUAL PLAN

Item No. 5h

I. STATEMENT OF FACTS

Moving to Work (MTW) is a demonstration program legislated by Congress in 1996 that provides increased autonomy for selected Public Housing Agencies (PHAs), authorizing certain regulatory and funding flexibilities in order to assist the PHA in meeting specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and increase housing choices for low-income families. MTW legislation allows participating PHAs to combine federal resources from the Public Housing Operating Budget, Capital Fund Program, and the Housing Choice Voucher Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

In October 1997, the former Housing Authority of Louisville (HAL) was chosen as one of 24 MTW Demonstration awardees. HAL's MTW Agreement, which specified the regulatory relief afforded to the organization, was finalized and signed on August 2, 1999, and was originally for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire as of June 30, 2005. LMHA was fortunate to receive a one-year extension, followed by an additional three-year extension.

On December 20, 2007, HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board on April 15, 2008, and was set to expire on June 30, 2018. On April 14, 2016, HUD notified LMHA that its existing agreement has been extended in its current form through June 30, 2028, with one modification, the addition of a single paragraph prohibiting any statutory offset of any reserve balances equal to four months of operating expenses.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other agencies. The FY 2018 MTW Annual Plan is for the fiscal year that begins July 1, 2017 and ends June 30, 2018.

The proposed FY 2018 MTW Annual Plan was made available for public comment from March 17, 2017 through April 17, 2017. A public hearing to discuss the proposed Plan was held on March 28, 2017.

The FY 2018 MTW Annual Plan requests HUD approval of one proposed MTW activity, "Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing" (Activity #49-2018). This activity is designed to assist the Housing Authority in meeting a Choice Neighborhoods Initiative requirement that off-site Beecher Terrace replacement units be located within mixed-income developments.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2018 MOVING TO WORK ANNUAL PLAN

Item No. 5h

Specifically, no more of 50% of units in any given development may receive direct, ongoing operating subsidy, meaning these units cannot receive Public Housing or Project Based Voucher subsidy. Rather, they must be purchased or developed outside of the Section 8 and Section 9 programs. LMHA has proposed to HUD that this be accomplished through the Broader Use of Funds authority provided through the MTW Program. This authority would allow the agency to acquire or develop non Section 8/9 units using its MTW Single Fund, provided the units are restricted to low-income households (households whose income does not exceed 80% of Area Median Income).

The Annual Plan indicates that LMHA will close out one MTW activity during FY 2018, "MTW Special Referral Program – Coalition for the Homeless 'Move Up' Program (Activity #45-2016). In partnership with the Coalition for the Homeless, this Special Referral Program provides expedited admission to the Housing Choice Voucher Program for families assisted by homeless services vouchers. Upon further research, LMHA staff believes this expedited admission process can be accomplished in a more streamlined manner outside of the MTW Program through the use of a limited admission preference.

The Plan also re-proposes the creation of a Local Asset Management Program, which would allow the agency to implement a broader fee for service approach towards asset management than is permissible for non-MTW public housing agencies. This activity was first proposed in the FY 2017 MTW Annual Plan, but has not yet received HUD approval. During FY 2017, LMHA executed an amendment to its Amended and Restated MTW Agreement with HUD that approves the creation of such a program; however, HUD has not yet approved the specific Local Asset Management Plan that LMHA has proposed.

A full copy of the FY 2018 MTW Annual Plan and the required Certifications of Compliance are provided as attachments to this resolution.

II. ALTERNATIVES

A. Approve the submission of the proposed FY 2018 Moving to Work Annual Plan and the required certifications.

B. Do not approve the submission of the proposed FY 2018 Moving to Work Annual Plan and the required certifications.

III. RECOMMENDATION

Staff recommends Alternative "A."

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2018 MOVING TO WORK ANNUAL PLAN

Item No. 5h

IV. JUSTIFICATION

LMHA, in consultation with residents and the community, has developed the proposed FY 2018 MTW Annual Plan.

Approval of an MTW Annual Plan by Board Resolution is a contractual requirement under the MTW Program, and will permit LMHA to take advantage of the flexibilities afforded to MTW agencies during FY 2018.

Submitted by: Tim Barry, Executive Director
Sarah Galloway, Moving to Work Coordinator
April 18, 2017

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 July 1, 2017, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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

Louisville Metro Housing Authority PHA Name	KY001 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)

Manfred Reid Name of Authorized Official	Chairman of the Board Title
Manfred H Reid Signature	4/12/2016 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.

B. Public Review Process

The Housing Authority's FY 2018 MTW Annual Plan was made available for public comment from March 17, 2017 thru April 17, 2017. Copies of the draft Plan were made available for public review on the Housing Authority's website (www.lmha1.org), at the Authority's central offices (420 S. 8th St., Louisville, KY 40203), at the Housing Authority's Section 8 office (801 Vine St., Louisville, KY 40204), and by mail as requested. In addition, members of the public who had previously requested to be notified of changes to LMHA policies were emailed an electronic copy of the Annual Plan.

A public hearing was held on March 28, 2017 at 6:00 PM at Avenue Plaza (400 S. 8th St., Louisville, KY 40203). A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 17, 2017. Approximately 13 people attended the hearing, including LMHA staff, Housing Authority residents, and local housing advocates.

- Newspaper notice advertising the Annual Plan public hearing and public comment period
- Resident flyer advertising the Annual Plan public hearing and public comment period
- Annual Plan public hearing sign-in sheet
- Annual Plan public hearing transcript
- Comments received from the public regarding the Annual Plan
- LMHA's responses to comments received from the public

Louisville Metro Housing Authority (LMHA) - Public Hearing & Public Comment Period for: 1) Amendment to FY2017 Moving to Work (MTW) Annual Plan to Create a Local Project-Based Voucher Program; 2) Changes to Public Housing Admissions & Continued Occupancy Policy; 3) Changes to Housing Choice Voucher Program Administrative Plan; & 4) Adoption of FY2018 MTW Annual Plan

There will be a public hearing to discuss the topics listed above on March 28, 2017 at 6:00 PM at Avenue Plaza (400 S. 8th St.) in the Community Room on the 2nd floor. Draft documents will be available for review and public comment from March 17, 2017 thru April 17, 2017 on LMHA's website (www.lmha1.org); at LMHA's Public Housing & Section 8 offices (420 S. 8th St. & 801 Vine St.), or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-4372. TDD: (502)587-0031.

Self Storage, lien auction, 1340 [illegible] Monday 3/20/2017

REAL ESTATE

PUBLISHER'S NOTICE

It is illegal under fair housing laws to advertise any preference, limitation, or discrimination based on race, color, religion, national origin, sex, disability, familial status, sexual orientation, or gender identity, or any intention to make any such preference, limitation, or discrimination. This newspaper will not knowingly accept any advertising for real estate which is in violation of the law. Our readers are hereby informed that all dwellings advertised in this newspaper are available on an equal opportunity basis. Please notify the Louisville Metro Human Relations Commission at 502-574-3631 if you feel there has been a violation.

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LOUISVILLE METRO HOUSING AUTHORITY

Public Hearing

Why? To get your input on:

1. A proposed Amendment to the FY 2017 Moving to Work Annual Plan
2. Draft FY 2018 Moving to Work Annual Plan
3. Proposed Changes to Housing Choice Voucher Program Administrative Plan
4. Proposed Changes to Public Housing Admissions & Continued Occupancy Policy

When? Tuesday, March 28, 2017 at 6:00 P.M.

Where? Avenue Plaza - 2nd Floor Community Room
400 S. 8th St., Louisville, KY 40203

Drafts of the these documents are being made available for review from March 17, 2017 thru April 17, 2017 on the agency's website (www.lmha1.org); at the Housing Authority's Central Office (420 S. 8th St); at the Housing Authority's Section 8 Office (801 Vine St.); or you can call (502) 569-4372 to request that a copy be mailed to you.

Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, please call (502) 569-4372. TDD: (502) 587-0831.

LOUISVILLE METRO HOUSING AUTHORITY

EQUAL HOUSING OPPORTUNITY

Public Hearing
FY17 Plan Amendment, FY18 Plan, HCV Admin Plan, ACOP
March 28, 2017

Would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings?

Name (Magac)	Organization / Development	Address / Phone Number	Email Address	Yes / No
Example: Jane Doe	Avenue Plaza	400 S. 8th St., Unit 1, 40203 (502) 555-1234	jdoe@gmail.com	Yes
1 Jessica Rhodes	Winterwood	1804 Russell Lee 5027787277	jRhodes@winterwoodonline.org	Yes
2 Sharon Summitt	Winterwood	Lexington Office 859-983-0834	ssummitt@winterwoodline.com	Yes
3 Lisa Osanka	LMHA	801 W. Ave St 40204	Osanka@lmha1.org	Y
4 Michael Johnson	Louderschall	634-3932		
5 Tim Barry	LMNV			
6 Robert Eulman	Lourdes Hall	295-9559	—	N
7 Tonya Wise	LMHA	569-4385	—	
8 Sheila Whitlock	Resident - different mail address	(502) 851-7297	Rlindsey@gmail.com	Y
9 Veresia Sistrunk	LMHA	5694490	—	N
10 Kevin Hughes	LMHA	569-3400	Hughes@lmha1.org	
11 Kathy Head	LMHA	569-3400	head@lmha1.org	
12 Mohamed Ambur	LMHA	569 6810	ambur@lmha1.org	
13 James Thomas	LMHA	569-7987	—	
14				
15				

Public Hearing

Avenue Plaza Community Room
420 S. Eighth Street
Louisville, KY 40203
March 28, 2017
6:00 p.m.

Tim Barry welcomed everyone to the FY 2018 Moving to Work Annual Plan public hearing comment period. He noted there are updates and changes to both Public Housing and Section 8.

Barry then introduced Sarah Galloway, LMHA's MTW Program Coordinator.

Galloway talked about the changes to the FY 2018 MTW Annual Plan:

During the next fiscal year, LMHA plans to purchase the H. Temple Spears building, located at 1515 Cypress Street. This building contains 65 one-bedroom units, and will be public housing.

In December 2016, LMHA received a $29,575,000 Choice Neighborhoods Implementation Grant from HUD to revitalize the Russell neighborhood, including the Beecher Terrace site. The Housing Authority plans to demolish all public housing units at Beecher, and replace them with a mixed-income community that will include replacement housing units to Beecher Terrace residents to move back into.

We plan to demolish the public housing units at Beecher in phases over several years. In FY 2018, the Housing Authority plans to demolish Buildings 51-59, which together contain 121 units.

This demolition will make way for the first phase of construction which will be a 120-unit senior building on the northern half of what is today Old Walnut Park (between 9th and 10th Street). The building will be open to individuals or families age 55 and older.

We also plan to develop about 80-100 Beecher Terrace replacement units off-site during the year. People will be relocated either within Russell or in other neighborhoods of opportunity across the city. The units will be subsidized with Project Based Vouchers. The Housing Authority's first purchase will be two buildings located at 1506 and 1508 W. Market Street. Together, these two buildings will provide 4 Beecher Terrace replacement units.

By the end of 2023, LMHA plans to develop new units to replace all 758 public housing units that will be demolished at Beecher Terrace. Households that are relocated from Beecher because of the project will have first priority to return to the new units as long as they remain lease compliant during the time they are living off-site. There will be no employment or income requirements.

In mid-April, LMHA will hold a meeting for Beecher Terrace residents to describe the relocation process and to provide an update on the plans for the senior building. We will distribute flyers to all residents with more information about the meeting beforehand.

Finally, related to Beecher Terrace, during the year we plan submit one or more disposition applications to the HUD Special Applications Center. We are still trying to figure out whether or not we will be doing a single application for the entire site or if we will need to do separate applications for each phase of redevelopment.

We also plan to sell 23 scattered site public housing units to Simmons College so they can use the apartments as student housing. We will replace those units with 23 new units so that no net housing units are lost.

We plan to sell 21 scattered site units because of excessive mold and/or lead abatement costs, and another 10 units because of recurring water damage. Again, LMHA will purchase replacement units so that no net housing units are lost.

LMHA will also continue to hold 24 public housing units off-line at the Friary. The Housing Authority has procured a private developer to redevelop the site, and that developer plans to apply for financing for tax credit funding during FY 2018.

We will also acquire full ownership of all 108 units that were built through the Park DuValle HOPE VI Project for Phase III (79 public housing units, 18 tax credit units, and 11 market rate units).

Galloway next talked about leasing:

By the end of fiscal year, which is June 30, 2018, LMHA plans to house approximately 3,900 households in our public housing program and approximately 9,750 families through our Section 8 Program.

We also expect to house 2 families through a special partnership with the Frazier Rehab Center. That program helps families that include persons with a spinal cord injury, and also 3 families through a partnership with YouthBuild Louisville that helps homeless YouthBuild participants.

LMHA also plans to house 4 families through what's called a "local, nontraditional, MTW Funded, Property-Based Assistance Program," which, she said, I'll describe a little later.

For a number of years, LMHA has had work or school requirements for single-family public housing homes. This year we will be removing those requirements so that you will not need to work or be in school to live in a public housing unit that is a single-family home.

LMHA may need to "freeze" some of its public housing units (that means not bringing in a new tenant when someone moves out), in order to make sure there are enough public housing units available for families that will be relocating from Beecher Terrace who wants to go to another public housing site.

Galloway then talked about a couple of significant new initiatives:

We said earlier that LMHA intends to demolish all 758 units that are currently at Beecher and replace them one for one. We are going to do that in a couple of different ways:

1. We are going to build back new units on the Beecher footprint

2. We are going to provide Project Based Voucher subsidies to units that are owned by someone else and we are going to buy or build possibly new units ourselves either in Russell or in other areas of opportunity throughout the city.

So, the Annual Plan describes how we're going to do the last option, which is where we would build or buy units off-site. According to our Choice Neighborhoods Grant Agreement with HUD, we can only put replacement units in developments where no more than half of the units are replacement units. So, if we bought a building that had four units in it only two of them could be replacement units for Beecher and the other two would have to be something else. The question is, what are those other two units? So the answer is, those other two units would be affordable to families earning at or below 80% of the Area Median Income and that would be restricted to those families. They will not receive direct, ongoing federal funding. The first place we plan to do that is with those two buildings we plan to buy in the Russell neighborhood at 1506 and 1508 W. Market Street. Four of those units will be for replacement units and the other four will be restricted to low-income families but they will not receive ongoing federal subsidy. Those four units that don't receive ongoing federal subsidy are the ones that are local, nontraditional, MTW Funded, Project-Based Assistance units.

We also plan to begin two new Section 8 partnerships during FY 2018 allocating up to 10 vouchers to St. Vincent DePaul's Transitional Housing Program, which assists families with children who are either homeless or at risk of being homeless. The document we put out for public comment says the program would serve homeless, disabled families with children but St. Vincent DePaul has requested we broaden the eligible population a little bit so we have revised it to read families with children where the family is either homeless or at risk of becoming homeless. We also plan to allocate up to 10 Section 8 vouchers to the House of Ruth to house individuals who are homeless and HIV-positive.

We are also changing the way one of our Section 8 partnerships work. Right now we allocate up to 100 vouchers to the Coalition for the Homeless to allow families that currently have a homeless services voucher to transition to a tenant-based Section 8 voucher. Instead of operating from them that way, instead we are going to offer a limited admission preference to eligible families. The program will still serve the same population, it's just kind of a technical change to the way we do the admission. The Coalition for the Homeless has also let us know that they would like for us to increase the number of families served through that partnership to 200, so we will make that change and put that document out for public comment.

Galloway next talked about how we plan to use our funding (Planned Uses of MTW Single Fund Flexibility, Including Reserves):

Approximately $5,218,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall of $1,545,000 in the Public Housing program for calendar year 2017 and 2018, and the continued ability to operate our projects at a high level and maintain a balanced operating budget. The HUD approved project expense levels at some of our properties do not adequately provide for management services at the level that we think should be necessary.

Although the Housing Authority has traditionally made transfers to the public housing program from both the Capital Fund Program (CFP) and the Section 8 program, the proposed budget year's transfer is made entirely from the Section 8 program. However, LMHA retains the authority and flexibility to transfer CFP funds as necessary under our current MTW regulations.

Although the Housing Authority utilizes the funding fungibility available through the MTW Program, all budgeting and reporting within the public housing program is done on an individual site basis, and LMHA utilizes a "fee for service" methodology that charges sites only for the services they receive. We have submitted what's called a Local Asset Management Plan (LAMP) to HUD for approval and should HUD approve that proposal, we may be implementing it during FY 2018.

We've also budgeted approximately $4,000,000 to acquire and/or develop replacement units to offset units that have been lost through demolition or disposition.

We've set aside approximately $29,450,000 to supplement the Choice Neighborhoods Initiative Implementation grant for the revitalization of Beecher Terrace and the wider Russell neighborhood, specifically for activities both on the Beecher Terrace footprint and off-site, including but not limited to the provision of replacement housing, in a manner consistent with the goals and objectives described in our Choice Neighborhoods Transformation Plan.

We've set aside approximately $2,500,000 to acquire a new facility to house the Housing Authority's Section 8 offices. This was included in last year's Annual Plan but we had budgeted it as replacement of chillers and boilers and we decided it would be more cost effective to seek a new facility instead of trying to repair.

Approximately $650,000 has been set aside to acquire 108 units and retire related debt on a HOPE VI tax-credit project that will soon reach the end of its tax-credit compliance period from Park DuValle III.

Also, approximately $50,000 to provide educational scholarships to public housing and Section 8 residents.

We may use our MTW single fund flexibility in the case of emergencies or catastrophic events, funding shortfalls, planned operating deficits, to provide adequate cash flow when receipt of federal subsidy is delayed, to increase our housing inventory (including Section 8 vouchers), or to provide gap financing in mixed-finance projects.

Galloway discussed the Amendment to LMHA's FY 2017 Annual Plan:

This amendment is related to the revitalization of Beecher Terrace. It creates what is called a local project-based voucher plan, which will allow us to attach Section 8 subsidy to specific housing units. As said earlier it will be 7-8 years to demolish Beecher Terrace and the replacement units are likely to be all or close to all project-based vouchers. Although the vouchers are tied to a specific unit, as long as you live in the unit for at least one year you can

take the voucher with you when you leave, and at that point it is portable just like a regular Section 8 voucher.

A draft Project Based Voucher Plan has been designed with several key objectives in mind:

- Supporting neighborhood revitalization, especially the transformation of the Russell neighborhood, by creating new housing choices that provide in-neighborhood relocation options for displaced Housing Authority residents and attract new residents to the neighborhood;
- To increase housing choices for low-income families in high-opportunity areas;
- To provide options for low-income families to live in mixed-income and mixed-use developments;
- To incentivize developers to preserve or create affordable housing units that expand housing options for low-income families.

We are asking for several waivers to the normal HUD rules to govern Project Based Voucher Program. These are the waivers we are asking for:

1. When a Housing Authority typically creates a Project Based Voucher Program, it is required to use the competitive process to decide where the vouchers will go. Through that competition, owners of housing units throughout the community are asked to submit proposals to the Housing Authority describing the units they want vouchers for. The housing can either be existing units or units the owner plans to construct in the near future. The Housing Authority then scores the application, and that's how units are selected. The Housing Authorities usually are not allowed to limit proposals to a specific site or geographic area, but we have asked for waivers that we can request proposals from developers who want to build new units on sites that we have ownership of or site control of or in various areas that meet certain criteria like areas of a lower poverty rate for example.

2. We have also asked for a waiver so that we can direct these vouchers at units that we own – for example, the two buildings we plan to buy at 1506 & 1508 W. Market Street without going through a competitive process.

3. Typically, you can only provide Project Based Vouchers to a maximum of 25% of the units in any project unless the project meets certain exception criteria, like the units are only available to senior, so we've asked for the ability to exceed this cap and to provide special assistance for 100% of units in any project.

4. We have also asked for a waiver relating to inspections. It is important that all housing units are inspected before they receive a voucher to make sure they are decent, safe, and sanitary. Under normal rules, the Housing Authority conducts those inspections, but since in the case of new construction and significant rehab, the city already does an inspection of all the units, we'd like to ask for permission to use the city's inspection as proof of satisfaction, they will have to prove to us that they passed the city inspection by providing us what's known as a "Certificate of Occupancy."

5. It's also important that units be inspected on a regular basis once they've received a voucher so we can make sure they stay decent, safe, and sanitary. The normal rules require that units be inspected whenever a tenant moves out and a new family moves in and that a random 20% of units be inspected once every two years. We've requested permission to inspect all of the units in any given building at the same time once per year so we can make sure inspections are occurring on a more regular basis.

6. Under normal rules, the contracts for the vouchers can only be 30 years long. We want to make sure voucher units stay affordable to low-income households for as long as possible, so we have asked for permission to extend those contracts to 40 years.

7. The first building being built back on the Beecher Terrace is going to be a senior building. Under typical rules, it would only be open to people at least 62 years old. We've asked permission to reduce that age and open the building up to people who are 55 and older.

8. We are also asking for a waiver regarding the maximum income of people living with Project Based Vouchers. Today, a family with an income that is at or below 80% of the Area Median Income can live at Beecher, but the incomes of families receiving Project Based Vouchers are usually capped at 50% of Area Median Income. We want to make sure families who are earning between 50% and 80% of Area Median Income can live in the Project Based Voucher units that we will be creating for the Beecher revitalization.

9. We also anticipate that many of the units that will receive Project Based Vouchers will also receive low-income housing tax credits. Usually, the Housing Authority has to verify income and assets for each family, but since the managers of tax credit units already have to do this, we are asking for permission to essentially re-use the form that the tax credit manager would use anyway.

Galloway then presented the changes to the Section 8 Housing Choice Voucher Program Administrative Plan:

Louisville Metro Government has set up a "rental registry" and all owners are required to register their rental units with the city now. So, LMHA will not provide Section 8 subsidy to any rental unit that is not listed in the city's registry.

LMHA also caps the rent increase that a Section 8 owner can request each year to 2% of the current rent. This has been our policy for a while, but was not explicitly stated in the Administrative Plan or the MTW Annual Plan but it was in other documents.

We've also added Family and Children's Place as a Section 8 special referral partner. Through this partnership, LMHA allocates up to 10 vouchers for people who are leaving an institution but who are at risk of homelessness.

Galloway said if you want to submit additional comments if you think of something you want to let us know about after today's meeting, you can either email or mail me your comments. We welcome comments through April 17.

Barry opened the floor for any questions/comments. There being none, the meeting adjourned.

Metropolitan Housing Coalition
P.O. Box 4533
Louisville, Kentucky 40204
Phone: (502) 584-6858
Fax: (502) 452-6718

Louisville Metro Housing Authority
FY2018 Moving to Work Annual Plan
FY2017 Moving to Work Plan amendments
Public Housing Admissions and Continued Occupancy Plan
Housing Choice Voucher Plan
Comments by Cathy Hinko
28 March 2017

Public Housing Admissions and Continued Occupancy Policy.

8.1 I

One of the tenets of public housing is that all public housing units are interchangeable, but the LMHA has set up a hierarchy of units that really is reminiscent of "deserving poor" and a caste system. Most distressing is that if a family that has not violated rules to be evicted is nonetheless forced, on their own cost, to move from scattered site units because of 4 or more late payments, behavior that apparently is not cause for eviction in other public housing sites. MHC is not suggesting making the rules tighter in other sites, but to have fair and even policies for ALL sites. While MHC is not, at this time, contesting rules for entry into the scattered site units, we are contesting the rules to force families to move at their own cost for behavior that would not cause eviction in other sites.

MHC reminds LMHA that this hierarchical approach of "good tenants" getting into places was not successful in the units on Breckinridge and other scattered sites, much as MHC predicted. Do not fine tune a failed approach which is all that this is doing

2017 Moving to Work Plan amendments

MHC applauds that Choice Grant one for one replacement includes one for one replacement of the number of bedrooms. Prior one for one replacement had a deleterious effect on the number of units serving families even as the percent of children experiencing homelessness rose. Please ensure the number of family units remains the same as well.

The fact that LMHA is forced to define "elderly" as 55 shows that the shift from family units to one bedroom units from prior HOPE VI programs has resulted in an oversupply of one bedroom units at cost to families.

MHC is not sure how lowering the age of elderly at the Beecher site would actually give more access to households already living there. This is not a sound reasoning for lowering the age of "elderly". But it is an excuse to replace with one-bedroom units. This may violate the Fair Housing Act as disparate impact by familial status.

MHC understands the benefits of the old school "rent ranges" and the need to bring in people with higher incomes. But there is no limit on how many will be in the 50% to 80% of income range and it looks like a push out of the very people that are most in need of public housing. There should be a limit for that upper range or LMHA will have lost the very reason that public housing exists.

Since 31% of Louisville's African Americans and 28% of Hispanic/Latinos live in poverty compared to 12% of Whites, this could have a disparate impact by race, nationality and ethnicity under the Fair Housing Act.

Housing Choice Voucher Plan

Much of this is about Project Based Vouchers. MHC renews its comments on income ranges from the comments on the amendments to the 2017 Moving to Work Plan amendments.

MHC also renews its comments on lowering "elderly" to age 55.

Moving To Work Annual Plan FY2018

MHC recommends keeping the Waiting List open.

MHC recommends one application for ALL units of public housing/ Project-Based housing HOPE VI housing and /or Choice Neighborhood housing and Housing Choice Vouchers. Why continue to torture those in need by making them guess where to apply to get assistance operated by LMHA. The single point of entry for homeless families is a best practice and that entailed different agencies. Surely LMHA can operate as one agency for those in need. LMHA simplified their entry criteria, so why not give that benefit to those who are in desperate need?

[**LMHA Note:** Original unsigned.]

April 27, 2017

Cathy Hinko
Executive Director
Metropolitan Housing Coalition
P.O. Box 4533
Louisville, KY 40204

Ms. Hinko:

Thank you for your comments on behalf of the Metropolitan Housing Coalition (MHC) regarding draft documents posted by the Louisville Metro Housing Authority (LMHA) for public comment from March 17 through April 17, 2017.

Please find your original comments, along with our responses, below:

Public Housing Admissions and Continued Occupancy Policy

MHC Comment

One of the tenets of public housing is that all public housing units are interchangeable, but the LMHA has set up a hierarchy of units that really is reminiscent of "deserving poor" and a caste system. Most distressing is that if a family that has not violated rules to be evicted is nonetheless forced, on their own cost, to move from scattered site units because of 4 or more late payments, behavior that apparently is not cause for eviction in other public housing sites. MHC is not suggesting making the rules tighter in other sites, but to have fair and even policies for ALL sites. While MHC is not, at this time, contesting rules for entry into the scattered site units, we are contesting the rules to force families to move at their own cost for behavior that would not cause eviction in other sites.

MHC reminds LMHA that this hierarchical approach of "good tenants" getting into places was not successful in the units on Breckinridge and other scattered sites, much as MHC predicted. Do not fine tune a failed approach which is all that this is doing

LMHA Response

LMHA respectfully disagrees with MHC's comparison of the required move policy for non-compliant scattered site households to "eviction." Although families who do not comply with the additional continued occupancy requirements for these units are obliged to move to a non-scattered site unit at the family's expense, they do **not** lose their housing subsidy, and continue to receive public housing assistance.

All moves to scattered site units are completely voluntary, and only occur when there is an affirmative request by the family. No family is required to reside in a public housing unit that has these additional continued occupancy requirements, and all families are made aware of and must agree to the move requirements before signing a lease.

420 South Eighth Street | Louisville, KY 40203 | 502 569.3400 | 502 569.3459 Fax

Amendment to FY 2017 Moving to Work (MTW) Annual Plan

MHC Comment

MHC applauds that Choice Grant one for one replacement includes one for one replacement of the number of bedrooms. Prior one for one replacement had a deleterious effect on the number of units serving families even as the percent of children experiencing homelessness rose. Please ensure the number of family units remains the same as well.

The fact that LMHA is forced to define "elderly" as 55 shows that the shift from family units to one bedroom units from prior HOPE VI programs has resulted in an oversupply of one bedroom units at cost to families.

MHC is not sure how lowering the age of elderly at the Beecher site would actually give more access to households already living there. This is not a sound reasoning for lowering the age of "elderly." But it is an excuse to replace with one-bedroom units.

LMHA Response

LMHA believes the bedroom size distribution of proposed on-site Beecher Terrace replacement units is appropriate given the family size and composition of the 674 households currently living at Beecher Terrace.[1] A full 58% of today's families (391 households) meet the Housing Authority's standards for residency in a one-bedroom unit. In contrast, 49% of the replacement units to be built back on the site will be one-bedroom units.

LMHA also considers the construction of a 120-unit senior building on the site more than warranted based on current resident demographics. As can be seen in the table below, 205 Beecher Terrace households include a head of household or spouse who is at least 55 years of age. By the end of the Choice Neighborhoods Initiative (CNI) Implementation grant period, 293 Beecher Terrace families will include a head of household or spouse who is at least 55 years of age. This equates to 2.4 eligible households for every one senior unit to be built back on the site.

Elderly Beecher Terrace Families*

	Number of Families	
	Today (3/27/2017)	**End of CNI Grant Period (9/30/2023)**
Age 55-61	105	94
Age 62+	100	199
Total (Age 55+)	**205**	**293**

*Based on age of head of household or spouse (whichever is older).

Furthermore, lowering the age at which a family may qualify for the new senior building from 62 to 55 will increase the number of current Beecher Terrace families eligible to return to this building within the CNI Implementation grant period from 199 to 293.

[1] Beecher Terrace demographic data is as of March 27, 2017.

MHC Comment

This may violate the Fair Housing Act as disparate impact by familial status.

LMHA Response

The Fair Housing Act specifically exempts certain types of senior housing facilities from liability for familial status discrimination; this is sometimes referred to as the "Housing for Older Persons" exemption. Housing that is "[i]ntended and operated for occupancy by persons 55 years of age or older" is exempted provided the facility satisfies each of the following requirements:

- At least 80% of the units have at least one occupant who is 55 years of age or older;
- The facility publishes and adheres to policies and procedures that demonstrate the intent to operate as "55 or older" housing; and
- The facility complies with HUD's regulatory requirements for age verification of residents.

The senior building to be constructed on the current Beecher Terrace footprint will be operated in a manner that fulfills the "Housing for Older Persons" exemption requirements.

MHC Comment

MHC understands the benefits of the old school "rent ranges" and the need to bring in people with higher incomes. But there is no limit on how many will be in the 50% to 80% of income range and it looks like a push out of the very people that are most in need of public housing. There should be a limit for that upper range or LMHA will have lost the very reason that public housing exists.

Since 31% of Louisville's African Americans and 28% of Hispanic/Latinos live in poverty compared to 12% of Whites, this could have a disparate impact by race, nationality and ethnicity under the Fair Housing Act.

LMHA Response

LMHA appreciates MHC's concern that the Housing Authority continue to serve those most in need of assistance. However, per statute, at least 75% of the families the Housing Authority assists must be very low-income (at or below 50% of Area Median Income (AMI)). This statutory requirement **cannot** be waived using LMHA's MTW authority, and provides a de facto limit on the number of families in the 50% to 80% income range who can be assisted by the Housing Authority.

LMHA also notes that all 316 replacement units to be built back on the Beecher Terrace site are slated to receive low-income housing tax credits (LIHTC), and will be limited to families whose income is at or under 60% of AMI. LMHA anticipates a significant majority of off-site replacement units will also receive LIHTC, and have an income cap of either 50% or 60% of AMI.

Housing Choice Voucher Program Administrative Plan

MHC Comment

Much of this is about Project Based Vouchers. MHC renews its comments on income ranges from the comments on the amendments to the 2017 Moving to Work Plan amendments.

LMHA Response

Please see previous response.

MHC Comment

MHC also renews its comments on lowering "elderly" to age 55.

LMHA Response

Please see previous response.

FY 2018 MTW Annual Plan

MHC Comment

MHC recommends keeping the Waiting List open.

LMHA Response

LMHA agrees that the waiting list should be kept open.

MHC Comment

MHC recommends one application for ALL units of public housing/ Project-Based housing HOPE VI housing and /or Choice Neighborhood housing and Housing Choice Vouchers. Why continue to torture those in need by making them guess where to apply to get assistance operated by LMHA. The single point of entry for homeless families is a best practice and that entailed different agencies. Surely LMHA can operate as one agency for those in need. LMHA simplified their entry criteria, so why not give that benefit to those who are in desperate need?

LMHA Response

LMHA agrees that simplification of the application process across its housing programs is a worthwhile goal, and will continue to examine the feasibility of combining applications where possible. However, such a system would require significant modifications to both LMHA's computer systems and the systems of private property managers. Funding for such a comprehensive overhaul is quite a challenge these days, to say the least, but LMHA will continue to look for grants and other opportunities to fund the conversion.

Thank you again for your thoughtful comments. Our door is always open for discussion of potential ways to improve the lives of the residents we serve.

Sincerely,

Tim Barry
Executive Director

COALITION FOR THE HOMELESS

Coalition for the Homeless
louhomeless.org

1300 S 4th St. Suite 250
Louisville, KY 40208

502.636.9550
502.636.9950 fax

March 24, 2017

Mr. Tim Barry
Louisville Metro Housing Authority
420 S. Eighth St.
Louisville, KY 40203

Dear Mr. Barry,

The Metro Louisville Continuum of Care board and The Coalition for the Homeless would like to once again thank Louisville Metro Housing Authority for the leadership you have provided in Louisville's efforts to end veteran, chronic and now youth homelessness through preferences, partnerships and set asides in LMHA resources. With your leadership, Louisville housed over 1,100 veterans in two years while also cutting the number of chronically homeless persons on the street in half.

After reviewing the plan, we understand that the method you will begin using to address the community's need of moving people from service-rich supportive housing and rapid re-housing to the housing choice voucher program has changed from a set aside to a limited admission preference coordinated through Family Health Centers. We agree that this maintains housing for those in the greatest need while simplifying administration that saves time for those in need of housing. We do, however, wish to request that you expand the number that can be served to 200 as we already have over 50 applicants in process and this would allow us to continue the program at the same level in the coming year.

Thank you again for your leadership, your willingness to target those in greatest need and this opportunity to make comment on the proposed changes.

Sincerely,

Natalie Harris
Executive Director

Sarah Galloway

From:	Sarah Galloway
Sent:	Wednesday, April 05, 2017 1:51 PM
To:	'Natalie Harris'
Cc:	Lisa Osanka; Tim Barry
Subject:	RE: Message from "RNP00267337F0F6"

Ms. Harris –

Louisville Metro Housing Authority staff thanks you for your comments regarding our draft FY 2018 MTW Annual Plan and related changes to our Housing Choice Voucher (HCV) Program Administrative Plan.

In response to your comments, the Housing Authority agrees that the limited admissions preference for those transitioning from a homeless services voucher to the HCV Program should be increased from a maximum of 100 families to a maximum of 200 families, so that the program can continue at the same level during the coming year. This change will be incorporated into the final versions of the Annual and HCV Administrative plans.

Thank you for your ongoing partnership as we work together to serve those with the greatest need in our community.

Sarah Galloway
Moving to Work (MTW) Program Coordinator
Louisville Metro Housing Authority
Phone: (502) 569-4372
Fax: (502) 569-3459
galloway@lmha1.org

SOCIETY of
ST. VINCENT
de PAUL

LOUISVILLE

1015-C S. Preston Street

Louisville, KY 40203

502.584.2480

fax 502.587.1977

www.svdplou.org

De Paul Apartments

Follow-Up Program

Open Hand Kitchen

Ozanam Inn

Roberts Hall

Simon Hall

St. Jude Women's Recovery Center

Tranquil House

De Paul Thrift Stores

Parish Conferences

Vehicle Donation

Volunteer Program

April 12, 2017

Sarah Galloway
Moving to Work (MTW) Program Coordinator
Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203

Dear Ms. Galloway,

Following review of the "Draft" of the Moving to Work / Housing Choice Voucher Plan documents, St Vincent de Paul is requesting a change in the description of the population served to be **"Homeless or at Risk of Homelessness Families with Children"** from the draft description of "Homeless, disabled Families with children".

Thank you,

Ed Wnorowski

Executive Director | CEO

From:	Sarah Galloway
To:	"ewnorowski@swdplou.org"
Cc:	Lisa Osanka
Subject:	RE: Louisville Metro Housing Authority Public Comment Period and Public Hearing
Date:	Thursday, April 27, 2017 5:18:00 PM

Mr. Wnorowski –

Louisville Metro Housing Authority staff thanks you for your comments regarding our FY 2018 MTW Annual Plan and related changes to our Housing Choice Voucher (HCV) Program Administrative Plan.

In response to your comments, the final FY 2018 MTW Annual Plan and HCV Program Administrative Plan adopted by our Board of Commissioners last week reflect your request that the description of the population to be served through our MTW Special Referral Program in partnership with St. Vincent de Paul be expanded to include families with children, where the family is either homeless or at risk of homelessness. The original draft versions of these documents indicated the program would serve homeless, disabled families with children.

Thank you for your ongoing partnership as we work together to serve those with the greatest need in our community.

Sarah Galloway
Moving to Work (MTW) Program Coordinator
Louisville Metro Housing Authority
Phone: (502) 569-4372
Fax: (502) 569-3459
galloway@lmha1.org

C. PHA-Directed Evaluations

LMHA has not directed an evaluation of its MTW program beyond those to be conducted and reported on in the MTW Annual Report and the impact analysis and annual reevaluation of ongoing rent reform initiatives.

D. Annual Statement / Performance and Evaluation Reports (HUD 50075.1)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2014
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 14 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant
x Original Annual Statement — Reserve for Disasters/Emergencies — x Revised Annual Statement (revision no: 3)
Performance and Evaluation Report for Period Ending: — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]				
3	1408 Mangagment Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	7,789,044	7,789,044	7,789,044	4,783,142
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:	Grant Type and Number		FFY of Grant: 2014
Louisville Metro Housing Auth	Capital Fund Program Grant No:	KY 36 P 001 501 14	FFY of Grant Approval: 0
	Replacement Housing Factor Grant No:		
	Date of CFFP:		

Type of Grant

x **Original Annual Statement** Reserve for Disasters/Emergencies **Revised Annual Statement (revision no: 3)**

Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)		0		
20	Amount of Annual Grant:: (sum of lines 2-19)	7,789,044	7,789,044	7,789,044	4,783,142
21	Amount of line 20 Related to LBP Activities	150,000	0		
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs		0		
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director **Date** **Director** **Date**

3/08/17

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised An
[3] PHAs with under 250 units in management may use 100% of CFP Grants for
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report. 0

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary

PHA Name:	Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/No): Replacement Housing Factor Grant No:	Federal FFY of Grant: 2014

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
PHA Wide	MTW Demonstration			7,789,044	7,789,044	7,789,044	1,263,966	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2015
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 15 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant

Original Annual Statement — Reserve for Disasters/Emergencies — Revised Annual Statement (revision no:)

x Performance and Evaluation Report for Period Ending: 6/30/16 — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]				
3	1408 Mangagment Improvements	45,378	45,378	45,378	45,378
4	1410 Administration (may not exceed 10% of line 21)	764,866	764,866	764,866	764,866
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	6,838,412	6,838,412	6,831,238	382,341
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2015
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 15 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 0

Type of Grant

Original Annual Statement — Reserve for Disasters/Emergencies — Revised Annual Statement (revision no:)

x Performance and Evaluation Report for Period Ending: 6/30/16 — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost[1]	
		Original	Revised[2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2-19)	7,648,656	7,648,656	7,641,482	1,192,585
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	Date	Director	Date
	3/1/17		

[1] To be completed for the Performance and Evaluation Report.
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[3] PHAs with under 250 units in management may use 100% of CFP Grants for
[4] RHF funds shall be included here.

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: CFFP (Yes/No): Replacement Housing Factor Grant No:	2015

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Park DuValle	Phase III Mixed Fin Contribution	1408	100%	45,378	45,378	45,378	45,378	
PHA Wide	Admin Salaries	1410	100%	764,866	764866	764,866	764,866	
PHA Wide	MTW Demonstration	1492	100%	6,838,412	6,838,412	6,831,238	382,341	
				7,648,656	7,648,656	7,641,482	1,192,585	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2016
Louisville Metro Housing Authorit	Capital Fund Program Grant No: KY 36 P 001 501 16 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant

Original Annual Statement — Reserve for Disasters/Emergencies — Revised Annual Statement (revision no:)
x Performance and Evaluation Report for Period Ending: 1/31/17 — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]				
3	1408 Mangagment Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration	8,276,117	8,276,117	846012	846012
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

Part I: Summary

PHA Name:		FFY of Grant: 2016
Louisville Metro Housing Auth	**Grant Type and Number** Capital Fund Program Grant No: KY 36 P 001 501 16 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 0

Type of Grant

x **Original Annual Statement** **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no:)**

x **Performance and Evaluation Report for Period Ending: 6/30/16** **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	8,276,117	8,276,117	846,012	846,012
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	Date	ctor	Date
[signature]	3/1/17		

[1] To be completed for the Performance and Evaluation Report
[2] To be completed for the Performance and Evaluation Report or a Revised Annual S
[3] PHAs with under 250 units in management may use 100% of CFP Grants for opere
[4] RHF funds shall be included here

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part II: Supporting Pages

PHA Name:	Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/No): Replacement Housing Factor Grant No:	Federal FFY of Grant:

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
	Moving to Work Demonstration	1492		8,276,117	8,276,117	846012	846012	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evalustion Report.

form HUD-50075.1 (7/2014)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/2011

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2015
Louisville Metro Housing Auth	Capital Fund Program Grant No: Emergency Safety and Security Grant - PIH 2014-09 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:

Type of Grant
Original Annual Statement — Reserve for Disasters/Emergencies — Revised Annual Statement (revision no:)
x Performance and Evaluation Report for Period Ending: 1.31.17 — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds	0			
2	1406 Operations (may not exceed 20% of line 21)[3]	0	0		
3	1408 Mangagment Improvements	48,791	0		
4	1410 Administration (may not exceed 10% of line 21)	0	0		
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	111,335	0		
8	1440 Site Acquisition				
9	1450 Site Improvement	0	0		
10	1460 Dwelling Structures	89,874	250,000	250,000	224,703
11	1465.1 Dwelling Equipment-Nonexpendable	0			
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	0	0		
14	1485 Demolition	0			
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]				

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/2011

Part I: Summary

PHA Name: Louisville Metro Housing Auth	**Grant Type and Number** Capital Fund Program Grant No: Emergency Safety and Security Grant - PIH 2014-09 Replacement Housing Factor Grant No: Date of CFFP:	**FFY of Grant:** 2015 **FFY of Grant Approval:** 0

Type of Grant
x **Original Annual Statement** **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no:)**
Performance and Evaluation Report for Period Ending: **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	0	0		
20	Amount of Annual Grant:: (sum of lines 2-19)	250,000	250,000	250,000	224,703
21	Amount of line 20 Related to LBP Activities	0	0		
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs		0		
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	Date	irector	Date
[signature]	3/2/17		

7,539,044

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised An
[3] PHAs with under 250 units in management may use 100% of CFP Grants for
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

1/31/2017

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/11

Part II: Supporting Pages

PHA Name:
Louisville Metro Housing Authority

Grant Type and Number
Capital Fund Program Grant No: KY 36 E 001 501 05
CFFP (Yes/No): N
Replacement Housing Factor Grant No:

Federal FFY of Grant: 2015

505

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account Number	Estimated Cost			Actual Cost		Status of Work
			Original	Revised [1]	Difference	Funds Obligated	Funds Expended	
			0	0	0	0	0	
			0	0	0	0	0	
			0	0	0	0	0	
			0	0	0	0	0	
Dosker Manor Ky 1-12								
	Security Upgrades - Bldg "A"	461000-146019-505-012	250,000	25,297	(224,703)	25,297		
	Ltd Access Control & Exterior Lighting - Bldg "A"	461000-146019-505-012						
	Caged Light Fixtures in stairwells (96 @ 317.40 ea)	1460		29,184	29,184	29,184	29184	
	Security Station Relocation and Enclosure	1460		60,184	60,184	60,184	60,184	Payne Electric
	Call Box Entry System Replacement	1460		135,335	135,335	135,335	135,335	Martin Construction
					0			
			250,000	250,000	0	250,000	224,703	0
			0	0	0	0	0	
			0	0	0	0	0	

Appendix I. Wait List Households by Bedroom Size

Households on LMHA Wait Lists by Bedroom Size (March 2017)

	Bedroom Size								Total
	0	1	2	3	4	5	6	Unknown	
Housing Choice Voucher (HCV) Program									
HCV Program	-	6,295	5,528	2,853	543	75	7	-	**15,301**
Public Housing Program									
LMHA-Managed Sites*	-	2,450	830	277	95	1	-	-	**3,653**
Liberty Green	46	690	98	194	-	-	-	-	**1,028**
Park DuValle	-	245	246	220	55	-	-	-	**766**
Sheppard Square	-	550	512	574	82	-	-	-	**1,718**
Wilart Arms	-	72	40	1	-	-	-	-	**113**
* Avenue Plaza, Beecher Terrace, Dosker Manor, Lourdes Hall, Parkway, St. Catherine Court, Will E. Seay Plaza									
Combined HCV / Public Housing Wait Lists									
Family Scholar House	-	-	-	-	-	-	-	951	**951**

Please note that households may be duplicated across wait lists.