

LAWRENCE-DOUGLAS COUNTY HOUSING AUTHORITY

# 2017 MTW PLAN



SUBMITTED OCTOBER 11, 2016  
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**The Lawrence-Douglas County Housing Authority**  
**Mission Statement**  
**To promote quality affordable housing, economic opportunity**  
**and a suitable living environment free from discrimination.**

## **Section I: Introduction**

The Lawrence-Douglas County Housing Authority (LDCHA) is proud to submit this 2017 MTW Plan that provides the strategy for continuing the remarkable success the MTW Demonstration has had in creating a locally driven housing program that increases the self-sufficiency of participants and housing choices in Lawrence, Kansas.

The LDCHA was created in 2001 through the merger of the Lawrence Housing Authority (KS053) and the Douglas County Housing Authority (KS160). The predecessor, Lawrence Housing Authority, was created in 1968 under the Kansas Municipal Housing Act as an independent agency of the City of Lawrence charged with developing, operating and managing low rent housing for the low income population of Lawrence, Kansas. The Douglas County Housing Authority was created in 1983 by the Douglas County Commission for the purposes of administering the Section 8 Certificate Program in Douglas County, Kansas, that was administered by the Lawrence Housing Authority. With the passage of the Quality Housing and Work Responsibility Act of 1998 the dual administration of these programs became impractical, and consequently on January 1, 2001, through a joint resolution of the City of Lawrence and Douglas County and with the approval of HUD, the two housing authorities merged as KS053, and KS160 was dissolved.

The LDCHA is governed by a five member board of commissioners, two appointed by the Douglas County Commission and three by the Mayor of the City of Lawrence. One member must be a LDCHA participant and is an appointee of the City of Lawrence. The LDCHA is operated by 40 dedicated staff members and administers combined a budget in excess of \$8 million.

### **Innovation Through Moving To Work**

The LDCHA was selected by HUD as one of the original 23 housing authorities to participate in the Moving to Work Demonstration program in 1998. The agency began implementation of the program on June 1, 1999, by adopting the following program initiatives to meet the Congressional MTW Objectives:

1. Abolish the separate public housing and Section 8 program administrative structure and create a new program of housing assistance called General Housing assistance which combines the family housing units of the public housing program and Section 8 Housing Choice Voucher (HCV) programs.
2. Change or eliminate four basic federal rules under the 1937 Housing Act that contradict customary social and economic norms and create administrative expense. The changes include:
  - The institution of suitability criteria as a part of eligibility criteria.
  - Modifying the definition of countable income and adjusted income.
  - The establishment of the concept of annual rent and abolishing (with some exceptions) interim re-examinations.
  - Instituting sweeping and comprehensive changes in the rent structure.
3. Establish a rent structure that provides affordability while it:
  - Values the unit.
  - Creates incentives to work.
  - Motivates households to work through a work requirement for all work able adults.
  - Establishes meaningful minimum and maximum rents.
  - Increases PHA income thereby reducing federal subsidy or increasing housing assistance without additional subsidy.
4. Increase Housing Choice:
  - For all Section 8 participants increase housing choice by permitting full discretion as to location, size and cost without regard to local Fair Market Rents.
  - For public housing residents of Edgewood Homes, increase housing choice by vouchering out up to 50 percent of the units over a 3 year period freeing units to rent to moderate income households thus creating a mixed income development. (*This was later eliminated in subsequent Plans.*)
5. Increase usage of existing federal funds:
  - Increase public housing rental income by \$150,000 per year.
  - Free \$500,000 per year of Section 8 subsidy.
  - Using these amounts to serve an additional 100 low income households without additional federal subsidy.
6. Expand by at least 100%, the Family Self Sufficiency program to require participation of non-exempt public housing and Section 8 households.

7. Provide homeownership opportunities including a \$3000 down payment match with local HOME funds. (*This was later modified in subsequent MTW Plans. See Activity 09-5.*)

The above initiatives created a locally driven housing program, and all of these initiatives continue to be the foundation of LDCHA's MTW program.

In April 2008 the agency signed a new 10 year standardized agreement extending the program to 2018. The new agreement provided expanded authorities for the agency, most significantly the establishment of LDCHA's MTW single fund budget with full flexibility that permits LDCHA through adoption of Activity 09-1 to combine its public housing operation, Capital Funds subsidies, and Section 8 HCV assistance into a single source to carry out its approved MTW activities. In May of 2016 the agency accepted HUD's offer of a 10-year extension of its existing MTW Restated Agreement, extending the MTW program according to its current terms through 2028.

The regulatory flexibility granted through the MTW Restated Agreement allows LDCHA to develop and implement innovative, market-based solutions to pursue and fulfill the three MTW statutory objectives:

- Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- Give incentives to families with children whose heads of households are either working, seeking work, or participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and
- Increase housing choices for low-income families.

LDCHA elected to participate in the MTW demonstration to make system-wide progressive changes to its housing programs in a way that allows the agency to provide the educational, vocational, and social supports that low-income households need to increase their opportunities to become self-sufficient. The MTW program has been more successful than initially envisioned and LDCHA remains committed to the innovative changes and progress this program has made possible for participants.

### **LDCHA Short-Term MTW Goals**

- Retain and successfully administer all proposed and previously approved Activities.

- Execute capital improvements to preserve, maintain and revitalize our public housing portfolio, to make the properties attractive, safe and energy efficient.
- Execute our operations in a manner to continue high performing status and to provide exceptional customer service.

### **LDCHA Long-Term MTW Goals**

- The agency's long-term MTW plan is to continue to institute policies and programs that create incentives for households to work, to increase household income and to become self-sufficient. In so doing, the agency will continue to promote homeownership and create additional housing opportunities for households.
- The agency will look for ways to reduce administrative burden, focusing on enhanced customer service and increased automation.
- LDCHA is committed to expanding the stock of affordable housing through the acquisition, new construction, reconstruction or moderate or substantial rehabilitation of housing (including, but not limited to, assisted living or other housing as deemed appropriate by LDCHA, in accordance with its mission), or commercial facilities consistent with the objectives of the demonstration. LDCHA plans to meet this goal through leveraging its MTW reserve funds to create innovative financing and development strategies through joint ventures or other partnerships.
- LDCHA is committed to being a good steward of the housing programs it is charged with administering. The agency will explore creative ways to continue to meet the statutory objectives of the MTW Demonstration while sustaining the long term financial viability of the LDCHA.

### **Non-MTW Related Housing Authority Programs and Partnerships**

The LDCHA operates several other housing programs besides the public housing and Section 8 HCV programs, and has developed several other partnerships that support LDCHA's MTW program.

### **Clinton Place**

The largest is a 58-unit project based Section 8 multi-family development for the elderly which the agency purchased in late 2006 and significantly renovated in 2007 with MTW funds.

### **Peterson Acres II**

The agency owns a second smaller 8-unit senior development that is fully handicapped accessible. This development is unsubsidized and operates with a below market sliding scale rate rent structure based on income.

### **Lawrence Expanded Housing**

Seven units of LDCHA owned property that is unsubsidized and operates with below market sliding scale rent structure based on income. Preference is given to youth aging out of foster care and /or veterans.

### **HOME - State**

LDCHA administers a grant that funds an estimated 18 - 20 unit Tenant-based Rental Assistance (TBRA) program funded by the State of Kansas with state HOME funds. The grantee for this program is the Bert Nash Community Mental Health Center. The LDCHA administers the program on behalf of the Bert Nash Center. Admission is restricted to Bert Nash clients.

### **HOME – City – Transitional Housing**

The LDCHA administers a Transitional Housing program that issues an estimated 15 - 20 units of TBRA and is grant funded annually by the City of Lawrence's HOME allocation. This program is restricted to homeless families and individuals who do not otherwise qualify for public housing or Section 8 assistance.

In both the Bert Nash program and the City HOME program, participants must enter into a support service agreement and participate in the activities contained in the agreement. Participants have up to two years to meet the qualifications for public housing or Section 8 assistance. At the end of the two year period they are transferred to either public housing or Section 8 assistance if they meet the eligibility qualifications, or, if not, their assistance is terminated. After their completion of the Transitional Housing program, many participants are then prepared to enter LDCHA's MTW program.

### **New Horizons**

LDCHA administers a grant from the City of Lawrence and Douglas County to house homeless families from the Lawrence Community Shelter. The program operates with the same requirements as the Transitional Housing Program. This program was developed to address the needs of homeless families and supplement the LDCHA Transitional Housing program which has received significant reductions in HOME funds. It currently serves 6 households.

### **HOPE Building**

The LDCHA also operates 6 units of permanent housing under the Continuum of Care Permanent Supportive Housing program for chronically homeless individuals who are dual diagnosed with mental health and substance abuse problems. The LDCHA uses MTW funds to provide the required match for this program.

### **Building Independence III**

Building Independence III is a Section 811 PRAC 4-unit property located in Baldwin City, Kansas. The property is owned by the Bert Nash Community Mental Health Center and operates under an annual housing assistance payment contract with HUD. The LDCHA is the owner's management agent responsible for all aspects of administration, management, operations and maintenance of the property.

### **Partnership with Douglas County Child Development Association (DCCDA)**

The LDCHA leases Units 159 and 160 at Edgewood Homes without a fee to the DCCDA to operate an early childhood education program called "Positive Bright Start". The lease requires that at least 16 children of LDCHA residents be enrolled per year in a DCCDA program. This space is also used for special educational services for these students and for providing evening childcare services for LDCHA parent/guardian MTW training opportunities. This program supports LDCHA's MTW program by providing convenient and affordable childcare for parents who are required to meet the MTW work requirement.

### **HUD-VASH Vouchers**

The HUD-Veterans Affairs Supportive Housing Program (HUD-VASH) combines Housing Choice Voucher rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA). LDCHA was given the opportunity to join in this effort in 2013 and to expand its participation in 2014 and 2015. The LDCHA readily accepted this opportunity to serve our veterans, and for 2017 will administer a total of 45 VASH vouchers.



## Section II: General Housing Authority Operating Information

### Section II.A: Housing Stock 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 |   |   |   |   |   |    | Total Units | Population Type * | # of UFAS Units  |           |
|----------------------------------|--------------|---|---|---|---|---|----|-------------|-------------------|------------------|-----------|
|                                  | 0            | 1 | 2 | 3 | 4 | 5 | 6+ |             |                   | Fully Accessible | Adaptable |
| PIC Dev. # /AMP<br>PIC Dev. Name | 0            | 0 | 0 | 0 | 0 | 0 | 0  | 0           | N/A               | 0                | 0         |
| PIC Dev. # /AMP<br>PIC Dev. Name | 0            | 0 | 0 | 0 | 0 | 0 | 0  | 0           | N/A               | 0                | 0         |
| PIC Dev. # /AMP<br>PIC Dev. Name | 0            | 0 | 0 | 0 | 0 | 0 | 0  | 0           | N/A               | 0                | 0         |
| PIC Dev. # /AMP<br>PIC Dev. Name | 0            | 0 | 0 | 0 | 0 | 0 | 0  | 0           | N/A               | 0                | 0         |

**Total Public Housing Units to be Added**

**0**

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

If Other, please describe: **N/A**

**Planned Public Housing Units to be Removed During the Fiscal Year**

| PIC Dev. # / AMP and<br>PIC Dev. Name | Number of Units to<br>be Removed | Explanation for Removal |
|---------------------------------------|----------------------------------|-------------------------|
|---------------------------------------|----------------------------------|-------------------------|

PIC Dev. # /AMP

**0**

**N/A**

PIC Dev. Name

PIC Dev. # /AMP

**0**

**N/A**

PIC Dev. Name

PIC Dev. # /AMP

**0**

**N/A**

PIC Dev. Name

**Total Number of Units  
to be Removed**

**0**

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

**Property Name**

**Description of Project**

**Anticipated Number  
of New Vouchers to  
be Project-Based \***

|     |   |     |
|-----|---|-----|
| N/A | 0 | N/A |
| N/A | 0 | N/A |
| N/A | 0 | N/A |
| N/A | 0 | N/A |

**Anticipated Total New  
Vouchers to be Pro-  
ject-Based**

**0**

Anticipated Total Number of Project-Based  
Vouchers Committed at the End of the Fiscal  
Year

**0**

Anticipated Total Number of Project-Based  
Vouchers Leased Up or Issued to a Potential  
Tenant at the End of the Fiscal Year

**0**

\*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

NONE.

N/A

N/A

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

LDCHA will use its 2017 Capital Funds grant exclusively for maintenance and improvements to public housing developments. The agency anticipates major expenditure for upgrades at turnover to the interiors of all its developments to include new kitchens and baths. Additionally the agency will spend an estimated \$50,000 for HVAC replacement at Edgewood Homes, and \$40,000 to replace hot water tanks and boilers at Babcock Place. Furthermore the LDCHA will use MTW reserve funds to replace the shingle roofs on its Edgewood Homes, a 130-unit family public housing development, and install speed humps for the safety of residents.

## Section II.B: Leasing Information

### 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   | 356  | 4,272   |
| Federal MTW Voucher (HCV) Units to be Utilized  | 745  | 8,940   |
| Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs ** | 70   | 840   |
| Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **   | 0  | 0   |
| <b>Total Households Projected to be Served</b>  | <b>1,171</b>                               | <b>14,052</b>                                     |

\* 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.

N/A

## 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

The Public Housing occupancy rate averages between 97% - 98%. There is a high turnover rate at the family developments as a result of LDCHA's strict enforcement of rent payment and anti-crime policies. The LDCHA has experienced difficulty filling 3 and 4 bedroom units due to lack of sufficient applicants. The Kansas Residential Landlord Tenant Act requires all lease holders to give 30 day notice of termination of the lease. This state law notice provision creates a 30 day delay from when a tenant accepts a public housing unit to when they can take occupancy. Vacancy days created by state law are beyond the ability of the agency to control.

Public Housing

Leasing issues may arise depending on funding that is actually provided under budget authority.

Section 8 HCV Program

Leasing issues may arise depending on funding that is actually provided under budget authority.

**Section II.C: Waitlist Information**

| 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 |
| General Housing<br>Federal MTW<br>Public Housing - Section 8<br>HCV        | Community-Wide<br>Combined/Merged | 400                               | Open  | N/A  |
| Babcock Place / Peterson<br>Acres I<br>Federal MTW<br>Public Housing Units | Site Based                        | 116                               | Open  | N/A  |
| Clinton Place<br>Project Based Local<br>Non-traditional MTW                | Site Based                        | 77                                | Open  | N/A  |
| Peterson Acres II<br>Project Based Local<br>Non-Traditional MTW            | Site Based                        | 4                                 | Open  | N/A  |

|                                  |                   |          |             |            |
|----------------------------------|-------------------|----------|-------------|------------|
| <b>Lawrence Expanded Housing</b> | <b>Site Based</b> | <b>1</b> | <b>Open</b> | <b>N/A</b> |
|----------------------------------|-------------------|----------|-------------|------------|

*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.

|            |
|------------|
| <b>N/A</b> |
| <b>N/A</b> |
| <b>N/A</b> |

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

|   |
|---|
| <b>Clinton Parkway Apartments - HUD Multifamily - Site based elderly and near elderly - open</b>                            |
| <b>Peterson Acres II -Site based non-subsidized LDCHA-owned affordable housing, all handicapped accessible units - open</b> |

**Lawrence Expanded Housing – Site based non-subsidized LDCHA owned affordable housing with a preference for youth aging out of foster care and/or veterans - open**

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

### Section III: Proposed MTW Activities: HUD Approval Requested

| A.   | B.  | C.  | D.  |
|--|---|---|---|
| <b>Activity<br/>17-1</b>   | <b><i>How Proposed Activity will<br/>meet Statutory Objective(s)</i></b>  | <b><i>Anticipated impact of proposed MTW ac-<br/>tivity of the stated objective(s)</i></b>  | <b><i>Anticipated<br/>schedules for<br/>achieving the<br/>stated objec-<br/>tive(s)</i></b> |
| <b>Exclude Asset Income from In-<br/>come Calculations for House-<br/>holds with Assets of \$20,000 or<br/>less and Allow Self-Certification<br/>of Assets valued at less than<br/>\$20,000 after initial certification.</b> | <p>This Activity will use MTW flexibility to:</p> <p>Exclude asset income from income calculations for as-<br/>sets of \$20,000 or less.</p> <p>Allow self-certification of the<br/>value of assets of \$20,000 or<br/>less after initial certification.<br/>This will meet the statutory<br/>objective to reduce adminis-<br/>trative costs of recertifications<br/>because the verification of as-<br/>set income process is very<br/>time consuming and yields lit-<br/>tle benefit or impact on rent<br/>calculation.</p> | <p>LDCHA anticipates that the impact of the<br/>activity will be to reduce administrative costs<br/>by decreasing time and resources utilized<br/>by all parties. It also may help households<br/>move toward economic self-sufficiency by<br/>encouraging saving. The majority of partici-<br/>pant households have assets of \$20,000 or<br/>less. This activity will simplify the income<br/>calculation process and reduce staff time to<br/>verify asset income.</p> <p>This activity qualifies as a rent reform activ-<br/>ity.</p> <p>This activity will work to the benefit of partic-<br/>ipants as an exclusion from income so no<br/>hardship policy is necessary.</p> <p>The agency will monitor and track self-certi-<br/>fications to determine the cost and time sav-<br/>ings. This will be compared to the decrease<br/>in tenant asset income revenue, and in-<br/>crease in HAP cost to re-evaluate the in-<br/>tended or unintended consequence of this<br/>activity.</p> | January 1, 2017.  |



## ***Cost Effectiveness***

When citing the statutory objective to “reduce cost and achieve greater cost effectiveness in federal expenditures,” include all of the following metrics that apply:

| <b><i>CE #1: Agency Cost Savings</i></b>  |   |  |                                      |                                      |
|---|---|--|--------------------------------------|--------------------------------------|
| <b>Unit of Measurement</b>                | <b>Baseline</b>   | <b>Benchmark</b>   | <b>Outcome</b>                       | <b>Benchmark Achieved?</b>           |
| Total cost of task in dollars (decrease). | Cost of task prior to implementation of the activity (in dollars) = <b>\$10,083 annual total.</b> | Expected cost of task after implementation of the activity (in dollars) = <b>\$4,148 annual total.</b> | To be provided in MTW Annual Report. | To be provided in MTW Annual Report. |

| <b><i>CE #2: Staff Time Savings</i></b>                      |   |  |                                      |                                      |
|--|---|--|--------------------------------------|--------------------------------------|
| <b>Unit of Measurement</b>                                   | <b>Baseline</b>   | <b>Benchmark</b>   | <b>Outcome</b>                       | <b>Benchmark Achieved?</b>           |
| Cost of staff time: \$33.13 per hour x 1 hour per household. | Total amount of staff time dedicated to the certifications of assets prior to implementation of the activity (in hours) = <b>439 hours.</b> | Expected amount of total staff time dedicated to the certifications of assets after implementation of the activity = <b>174 hours.</b> | To be provided in MTW Annual Report. | To be provided in MTW Annual Report. |

| <b><i>CE #3: Decrease in Error Rate of Task Execution</i></b> |                 |                  |                |                            |
|---|-----------------|------------------|----------------|----------------------------|
| <b>Unit of Measurement</b>                                    | <b>Baseline</b> | <b>Benchmark</b> | <b>Outcome</b> | <b>Benchmark Achieved?</b> |

|   |   |   |                                      |                                      |  |
|---|---|---|--------------------------------------|--------------------------------------|--|
| Average error rate in completing a task as a percentage (decrease).<br><b>LDCHA has not previously tracked an error rate for this activity.</b> | Average error rate of task prior to implementation of the activity (percentage) = <b>0%</b>   | Expected average error rate of task after implementation of the activity (percentage) = <b>0%</b> | To be provided in MTW Annual Report. | To be provided in MTW Annual Report. |  |
|   |   |   |                                      |                                      |  |
| <b>CE #5: Increase in Agency Rental Revenue</b>   |   |   |                                      |                                      |  |
| <b>Unit of Measurement</b>  | <b>Baseline</b>   | <b>Benchmark</b>  | <b>Outcome</b>                       | <b>Benchmark Achieved?</b>           |  |
| Tenant rent share (decrease).   | 2016 tenant rental revenue from households with income from assets at or less than \$20,000 was \$287 and increase in HAP to HCV landlords will be \$104. | From tenant rental revenue from asset income for assets of \$20,000 or less = <b>0</b>            | To be provided in MTW Annual Report. | To be provided in MTW Annual Report. |  |

#### J. Authorization for Proposed Activity

This proposed activity is authorized in LDCHA's Moving to Work Agreement Attachment C as necessary to implement the Agency's Annual MTW Plan:

Paragraph C (4) The Agency is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided. *This authorization waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R. 966.4 and 960.257;*

Paragraph C (11) The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent, and to adopt and implement any reasonable policies for setting rents in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations. *This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A;*

Paragraph D (1)(c) The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated. *This authorization waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 C.F.R. 982.516;*

Paragraph D (2)(a) The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. *This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518; and*

Paragraph D (3)(b) The Agency is authorized 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. *This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E.*

#### **K. Explanation of why cited authorization is needed**

LDCHA needs MTW authorization to exclude income that differs from those in current statutes or regulations and use a different reasonable policy for verifying household income that differs from the currently mandated program requirements.

## Section IV: Approved MTW Activities: HUD approval previously granted

### A. IMPLEMENTED ACTIVITIES

| <b>Activity<br/>16-1</b>  | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications dur-<br/>ing Plan year</b> | <b>Planned changes or<br/>modifications to<br/>metrics, baselines<br/>or benchmarks</b> |
|---|--|--|---|
| <p><b>Approved for 2016 Plan<br/>Implemented 2016</b></p> <p><b>Safe Housing Program</b><br/>Rent Assistance for Victims<br/>of Domestic Violence</p> | <p>This Activity uses MTW flexibility to provide ten (10) Safe Housing Program (SHP) transitional housing vouchers issued to eligible households / individuals in the Willow Domestic Violence Center Program, or another service provider who certifies the applicant's status as a victim of domestic violence, and is a Douglas County, Kansas resident. To be eligible a SHP participant must meet the LDCHA General Housing eligibility requirements, except the good residential history.</p> <p>The SHP participants must be in a support services agreement while receiving SHP housing assistance. Support services will be administered by the Willow Domestic Violence Center (WDVC) or another provider. Participants refusing to participate in a support service agreement will not have their housing assistance renewed at the next annual recertification.</p> <p>The SHP participant must find a rental unit in Lawrence or Douglas County, Kansas, with a landlord who will enter into a lease and a rent subsidy contract with the LDCHA. The unit must be able to pass an inspection by the LDCHA.</p> <p>Vouchers issued under this activity are not portable except for reasonable accommodation or VAWA reasons. SHP voucher-holders that are in good standing at the end of the 24 month period, including working at least 15 hours per week (if in the MTW rent structure), positive landlord recommendation, no pending lease violations or eviction actions, and similar factors will be transferred to a standard Section 8 voucher.</p> | <p>No changes or modifications are planned.</p>                    | <p>No changes or modifications are planned.</p>   |

| <b>Activity<br/>16-2</b>   | <b>Description and Update on Status</b>   | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--|---|--|---|
| <p><b>Approved for 2016 Plan Implemented 2016</b></p> <p><b>Next Step Vouchers (NSV)</b><br/>Housing Assistance for Youth who have Aged Out of Foster Care</p> | <p>This Activity uses MTW flexibility to LDCHA will create up to five vouchers depending on available funding to house aged out foster youth for up to 36 months or until age 23, whichever comes first. To be eligible a youth must meet the LDCHA General Housing eligibility requirements except the good residential history. The NSV participant must find a rental unit in Lawrence or Douglas County, Kansas, with a landlord who will enter into a lease and a rent subsidy contract with the LDCHA. The unit must be able to pass an inspection by the LDCHA.</p> <p>NSV voucher-holders that are in good standing, including stabilization, working at least 15 hours per week if in the MTW rent structure, positive landlord recommendation, no pending lease violation or eviction actions, and similar factors at the end of the 36 month period, or longer if required for educational purposes, will be transferred to a standard Section 8 voucher. Participant would be able to transfer after 24 months but prior to 36 months if the LDCHA eligibility requirements are met and the participant requests the transfer.</p> <p>All NSV participants must complete the LDCHA Renters Education program. LDCHA will also require voucher-holders under this activity to begin, continue, and/or maintain appointments and visits with social service providers as recommended by assessment to assist these households in the preparation of living independently and creating a stable living environment.</p> <p>Vouchers issued under this activity are not portable except for reasonable accommodation or VAWA reasons. LDCHA reserves the authority to extend NSVs up to 12 months to allow full time students to complete their degree.</p> | <p>No changes or modifications are planned.</p>                  | <p>No changes or modifications are planned.</p>   |



| <b>Activity<br/>14-1</b>   | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--|--|--|---|
| <b>Approved for 2014 Plan<br/>Implemented 2014</b><br><br>Create a Biennial Housing<br>Quality Standards (HQS) In-<br>spection process for existing<br>Housing Choice Voucher<br>(HCV) properties. | This Activity uses MTW flexibility to revise the HQS certi-<br>fication to permit biennial HQS inspections for units that<br>have a record of good property maintenance, a history of<br>making repairs in a timely manner, and have passed HQS<br>on the first inspection for two consecutive annual inspec-<br>tions. If the unit does not pass on the biennial first inspec-<br>tion it will return to the annual inspection schedule. The unit<br>must also have the same resident for 36 months. Special<br>inspections will continue, including at the request of a resi-<br>dent. | No changes or<br>modifications are<br>planned.                   | No changes or<br>modifications are<br>planned.  |

| <b>Activity<br/>14-2</b>  | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|---|--|--|---|
| <b>Approved for 2014 Plan<br/>Implemented 2014</b><br><br>Create a Landlord On-Site<br>Self-Certification that minor re-<br>pairs are complete. | This Activity uses MTW flexibility to revise the HQS certi-<br>fication to allow Landlord Self-Certification of Correction at<br>LDCHA's discretion and in cases where all deficiencies are<br>minor non-life-threatening, non-safety-hazard deficiencies<br>as determined by an approved list maintained by LDCHA.<br>The "Landlord On-Site Verification and Re-Inspection<br>Form" is included in Appendix II. | No changes or<br>modifications are<br>planned.                   | No changes or<br>modifications are<br>planned.  |

| <b>Activity<br/>14-3</b>  | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|---|--|--|---|
| <b>Approved for 2014 Plan<br/>Implemented 2014</b><br><br>Change the effective dates of<br>variables affecting rent calcula-<br>tions to January 1. | This Activity uses MTW flexibility to change the effective<br>dates for program changes that affect rent calculations such<br>as Fair Market Rent, Voucher Payment Standard and Utility<br>Allowance, etc., to correspond with the beginning of<br>LDCHA's fiscal year, January 1. This will reduce cost and<br>achieve greater cost effectiveness by eliminating unneces-<br>sary reprinting of key agency documents. | No changes or<br>modifications are<br>planned.                   | No changes or<br>modifications are<br>planned.  |

| <b>Activity<br/>13-1</b>   | <b>Description and Update on Status</b>   | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--|---|--|---|
| <b>Approved for 2013 Plan<br/>Implemented 2013</b><br>Create an Affordable Housing<br>Acquisition and Development<br>Fund. | The LDCHA Board of Commissioners authorized the use of<br>up to \$1 million for the development of new low income af-<br>fordable housing, and LDCHA may use its MTW flexibility<br>to purchase land and/or improvements, or participate in<br>project ownership and/or development by providing financ-<br>ing for direct construction or rehabilitation costs. LDCHA<br>may leverage, where possible, additional funds from private<br>and public sources (including Low Income Housing Tax<br>Credits, Private Activity Bonds, or other available financing<br>methods). This activity is designed to increase housing<br>choice for low-income households utilizing MTW reserves.<br>There is no current acquisition or development in process,<br>however the LDCHA is exploring various projects. | No changes or<br>modifications are<br>planned.                   | No changes or<br>modifications are<br>planned.  |

| <b>Activity<br/>10-1</b>   | <b>Description and Update on Status</b>  | <b>Planned changes or modifications during Plan year</b> | <b>Planned changes or modifications to metrics, baselines or benchmarks</b> |
|--|--|--|---|
| <b>Approved for 2010 Plan Implemented 2010</b><br><br>Biennial recertification for public housing and Section 8 elderly and disabled households. | Adopt alternative recertification schedule to conduct biennial recertification for all elderly and disabled public housing and Section 8 households on fixed incomes, to reduce the total number of annual recertifications processed to reduce cost and achieve greater administrative efficiencies.<br><br><b>Hardship Policy:</b> Participants may request a hardship and be recertified in the year identified to skip if their annual medical expenses have increased by 10% in the previous 12 months. | No changes or modifications are planned.                 | No changes or modifications are planned.                                    |

| <b>Activity<br/>09-5</b>   | <b>Description and Update on Status</b>  | <b>Planned changes or modifications during Plan year</b> | <b>Planned changes or modifications to metrics, baselines or benchmarks</b> |
|--|--|--|---|
| <b>Approved for 2009 Plan, implemented 2009:</b> Homeownership matching grant. | Revised original MTW Homeownership Program to create equity between Public Housing and Section 8 to provide up to \$3000 matching grant for MTW households that purchase a home. | No changes or modifications are planned.                 | No changes or modifications are planned.                                    |

| <b>Activity<br/>09-6</b>   | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--|--|--|---|
| <b>Approved for 2009 Plan<br/>Implemented 2009</b><br><br>Revise definition of countable income. | Excluded earned income of young adult children between the ages of 18 and 21 not enrolled full-time in school, and excluded earned income of young adult children between 18-24 if enrolled full-time as a student, while retaining the work requirement for these groups. This Activity is authorized by the MTW flexibility to establish alternate definitions of income, and to encourage work. This Activity was designed to not penalize the entire household for the fluctuations in employment of young adult children. Additionally it reduces administrative cost by eliminating the need for frequent rent recalculations and encourages work through program enforcement for this population. | No changes or modifications are planned.                         | No changes or modifications are planned.  |

| <b>Activity<br/>09-6.1</b>   | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--|--|--|---|
| <b>Approved for 2009 Plan<br/>Implemented 2009</b><br><br>Revise definition of countable income. | This Activity is designed to achieve greater administrative efficiency by eliminating the 12:12:48 month Earned Income Disallowance rule, and including those amounts as income, as permitted by the MTW flexibility that allows LDCHA to establish alternate definitions of income. | No changes or modifications are planned.                         | No changes or modifications are planned.  |

| <b>Activity<br/>09-8</b>   | <b>Description and Update on Status</b>  | <b><i>Planned changes or<br/>modifications during<br/>Plan year</i></b> | <b><i>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</i></b> |
|--|--|---|--|
| <b>Approved for 2009 Plan<br/>Implemented 2010</b><br>Create a jail re-entry housing program | Create 5 units of transitional re-entry vouchers in partnership with Douglas County Sheriff's Office for inmates participating in a re-entry program. The Sheriff's Office provides the services for this program. To be eligible for referral to the LDCHA the inmate being released from Douglas County jail must meet performance criteria established by the Jail Re-entry Program. To qualify for assistance the inmate must be a Douglas County resident and must not be excluded under the federal housing mandatory prohibition rules. | No changes or modifications are planned.                                | No changes or modifications are planned.   |

| <b>Activity<br/>99-1</b>   | <b>Description and Update on Status</b>  | <b><i>Planned changes or<br/>modifications during<br/>Plan year</i></b> | <b><i>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</i></b> |
|--|--|---|--|
| <b>Approved for 1999 Plan<br/>Implemented 1999</b><br>Combined Public Housing and Section 8 HCV programs and operations. | This Activity uses MTW flexibility to establish a locally designed waiting list and tenant selection criteria by combining the public housing family housing units and Section 8 HCV into one program called General Housing with one waiting list and single organizational program structure. The objective of this Activity was to decrease the vacancy rate by using the same suitability criteria for both programs and offering the next available unit to the applicant at the top of the waiting list. Additionally it decreases administrative burden by reducing voluntary unit turnover cost. | No changes or modifications are planned.                                | No changes or modifications are planned.   |



| Activity<br>99-2  | Description and Update on Status   | Planned changes or<br>modifications during<br>Plan year | Planned changes or<br>modifications to met-<br>rics, baselines or<br>benchmarks |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
|---|--|---|---|---------|-----------|--------|--------|-----------|--------|--------|-----------|--------|--------|-----------|--------|--------|-----------|--------|--------|--|--|
| Approved for 1999 Plan<br>Implemented 1999<br>Alternative rent structure. | <p>Developed alternative MTW rent structure with minimum and maximum annual rents that are adjusted periodically and applied to all non-disabled/non-elderly households in the General Housing program. The rent structure requires all non-elderly, non-disabled adults to pay a significant minimum amount of rent regardless of their income. To reward work, the agency set a maximum rent for each size unit.</p> <table><tr><th>Bedroom Size</th><th>Minimum</th><th>Maximum</th></tr><tr><td>1 Bedroom</td><td>\$ 185</td><td>\$ 435</td></tr><tr><td>2 Bedroom</td><td>\$ 215</td><td>\$ 500</td></tr><tr><td>3 Bedroom</td><td>\$ 255</td><td>\$ 575</td></tr><tr><td>4 Bedroom</td><td>\$ 275</td><td>\$ 665</td></tr><tr><td>5 Bedroom</td><td>\$ 315</td><td>\$ 690</td></tr></table> <p>To encourage employment advancement the agency established a system of income deductions that increase as hours of work increase.</p> <p>Special income deductions for MTW households include:</p> <ul style="list-style-type: none"><li>• 10% earned income deduction for those working at least 35 hours/week</li><li>• \$2,000 medical deduction for those working at least 35 hours/week</li><li>• full out-of-pocket dependent care deduction necessary to allow work or school attendance</li><li>• utility allowance as an annual income deduction, not as a monthly deduction from rent</li><li>• increase in the child dependent deduction to \$840 per child capped at \$1,680 per household</li></ul> <p>Flat rents are not applied in the MTW rent structure, and MTW participants are not eligible for the flat rent option.</p> | Bedroom Size  | Minimum   | Maximum | 1 Bedroom | \$ 185 | \$ 435 | 2 Bedroom | \$ 215 | \$ 500 | 3 Bedroom | \$ 255 | \$ 575 | 4 Bedroom | \$ 275 | \$ 665 | 5 Bedroom | \$ 315 | \$ 690 | No changes or modifications are planned. | No changes or modifications are planned. |
| Bedroom Size  | Minimum  | Maximum   |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
| 1 Bedroom   | \$ 185   | \$ 435  |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
| 2 Bedroom   | \$ 215   | \$ 500  |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
| 3 Bedroom   | \$ 255   | \$ 575  |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
| 4 Bedroom   | \$ 275   | \$ 665  |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |
| 5 Bedroom   | \$ 315   | \$ 690  |   |         |           |        |        |           |        |        |           |        |        |           |        |        |           |        |        |  |  |

| <b>Activity<br/>99-2</b> | <b>Description and Update on Status</b>   | <b>Planned changes or<br/>modifications during<br/>Plan year</b> | <b>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</b> |
|--------------------------|---|--|---|
|                          | <p>The LDCHA's Rent Hardship Policy permits a degree of rent relief if the household experiences a loss in income. Under the policy, a household not under termination may be recertified based on the nature and amount of the income loss.</p> <p>If loss of earned income equals or is greater than 50% of total reported earned income, then the MTW Hardship Rent shall be reset to \$50 a month for the household for a three consecutive month period.</p> <p style="text-align: center;">Or</p> <p>If loss of earned income is at least 25% but is less than 50% of total reported earned income, the MTW Hardship Rent shall be reset \$100 a month for the household for a three consecutive month period.</p> <p>Amend the policy to establish that hardships requests may be denied based upon a pattern of policy abuse per the LDCHA Fraud Policy - Resolution 539, as amended. The rent reduction is for a period not to exceed three months. A household may have a hardship rent reduction only once every 12 months from the end of an approved hardship request. If the household's income loss is due to a condition that qualifies the individual for a disability under ADA, the household's designation is changed from MTW to income-based and they are then recertified. The alternative rent structure and hardship policies are more fully outlined in Appendix I.</p> <p>Section 8 portability is restricted. MTW households may not move outside the LDCHA's jurisdiction unless the household applies for and receives an exception from this rule as a reasonable accommodation for a disability, VAWA, or other good cause,</p> |  |   |

| <b>Activity<br/>99-2</b> | <b><i>Description and Update on Status</i></b>  | <b><i>Planned changes or<br/>modifications during<br/>Plan year</i></b> | <b><i>Planned changes or<br/>modifications to met-<br/>rics, baselines or<br/>benchmarks</i></b> |
|--------------------------|---|---|--|
|                          | <p>such as taking a job in a different city, education, or other household need. Households porting into the LDCHA's jurisdiction must participate in the MTW program.</p> <p>An important component of the LDCHA's MTW rent structure is the feature of Annual Rent or Fixed Rent. Rent is fixed for one year and does not change, regardless of changes in household income or composition except in instances where a household permanently loses income through death, divorce, or when an income producing adult child whose income was included in the rent calculation moves out of the household.</p> |   |  |

| <b>Activity<br/>99-3</b>  | <b>Description and Update on Status</b>  | <b>Planned changes or<br/>modifications dur-<br/>ing Plan year</b> | <b>Planned changes or<br/>modifications to<br/>metrics, baselines<br/>or benchmarks</b> |
|---|--|--|---|
| <p><b>Approved for 1999 Plan<br/>Implemented 1999</b><br/>Work requirement.</p> | <p>This Activity establishes an MTW work requirement which applies to all households in the General Housing program with a non-elderly non-disabled adult in the household. The work requirement mandates that all able-bodied adults age 18 and older work a minimum of 15 hours a week. For a two-adult household with minor children, the work requirement can be met if one adult works 35 hours per week. Enrollment in a post secondary education program or Work Training Program satisfies the work requirement. An adult child in the household is also subject to the work requirement. Residents who fail to meet the work requirement must participate in the LDCHA's Family Self-Sufficiency Program 15 hours per week. Failure to meet the work requirement is a major program breach.</p> <p>Following are the exemptions to the work requirement and MTW rent structure.</p> <ul style="list-style-type: none"> <li>• A person over age 62 or person who has a permanent disability that prevents them from getting and/or keeping employment.</li> <li>• A person under age 62 and over 18 who is the only caretaker for a disabled/elderly family member.</li> <li>• Discretionary exemption for households with only one adult who does not have disability status, who is over age 40, and/or who, due to limitations of employment experience, education or training, is unable to earn sufficient income to meet the rent requirement.</li> <li>• Households with one or two adults, neither of whom have disability status, who are over age 50, and who do not have children residing in the household.</li> </ul> | <p>No changes or modifications are planned.</p>                    | <p>No changes or modifications are planned.</p>   |

| <b>Activity<br/>99-3</b> | <b>Description and Update on Status</b>   | <b>Planned changes or<br/>modifications dur-<br/>ing Plan year</b> | <b>Planned changes or<br/>modifications to<br/>metrics, baselines<br/>or benchmarks</b> |
|--------------------------|---|--|---|
|                          | <ul style="list-style-type: none"> <li>Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work" by DCF. The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement.</li> </ul> <p>Exempt households may elect annually to participate in the MTW rent structure if they meet the work requirement through employment income.</p> <p>Failure to meet the work requirement results in a lease violation. If not corrected, tenant rent goes to full market rate for the unit.</p> |  |   |

## B. NOT YET IMPLEMENTED ACTIVITIES

All Activities have been implemented.

## C. ACTIVITIES ON HOLD

It is anticipated that no activities will be on hold for the 2017 Plan year, unless funding becomes an issue.

## D. CLOSED OUT ACTIVITIES

| <b>Activity<br/>12-1</b>  | <b>Description</b>  | <b>Reason Activity is closed out</b>              |
|---|---|---|
| <b>Approved for 2012 Plan, implemented 2012:</b> Biennial recertification for Section 8 elderly and disabled households. Closed out 2015. | Conduct biennial recertification for all elderly and disabled Section 8 households. | Combined with Activity 10-1, and closed out 12-1. |

| <b>Activity<br/>11-1</b>  | <b>Description</b>  | <b>Reason Activity is closed out</b>   |
|---|---|--|
| <b>Approved for 2011 Plan Implemented 2011:</b><br>Provide financial assistance for vehicle repair. | Provide up to \$500 per household for vehicle repair to assist MTW households with children to obtain or retain employment, | This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility." |

| <b>Activity<br/>11-1</b> | <b>Description</b>                                       | <b>Reason Activity is closed out</b> |
|--------------------------|--|--------------------------------------|
|                          | employment training, or attend post secondary education. |                                      |

| <b>Activity<br/>11-2</b>   | <b>Description</b>   | <b>Reason Activity is closed out</b>   |
|--|--|--|
| <b>Approved for 2011 Plan Implemented 2011:</b><br>Partner with Douglas County Housing Incorporated (DCHI), to create the Full Circle youth program. | Use DCHI, an affiliated nonprofit, to pursue private and public foundation grant funding that is restricted to nonprofit organizations in order to expand program opportunities and activities for LDCHA youth, particularly the children of parents participating in the MTW program. The Full Circle youth program provides year-round social, educational, health and recreational opportunities for youth. | This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility." |

| <b>Activity<br/>11-3</b>   | <b>Description</b>   | <b>Reason Activity is closed out</b>   |
|--|--|--|
| <b>Approved for 2011 Plan, implemented 2013:</b> Combine the Administrative Plan and the Public Housing ACOP into one policy statement. Closed out 2013. | Combine Section 8 Housing Choice Voucher Administrative Plan and public housing Admissions and Continued Occupancy policy and Methods of Administration to create consistency and safeguard staff accuracy in the application of MTW policies under the public housing and Section 8 HCV programs. | Activity was completed, published for public comment and adopted by the Board of Commissioners on August 26, 2013. |

| <b>Activity<br/>10-2</b>   | <b>Description</b>   | <b>Reason Activity is closed out</b>   |
|--|--|--|
| <b>Approved for 2009 Plan Implemented 2009:</b><br>Expand employment related services to MTW households. | Provide funding for technical training, education, certifications, employment counseling and childcare services to permit heads of household to seek, obtain and retain employment. This Activity is designed to reduce the barriers to employment and underemployment, to maximize a household's potential for securing long-term employment. | This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility." |

| <b>Activity<br/>10-3</b>   | <b>Description</b>  | <b>Reason Activity is closed out</b>   |
|--|---|--|
| <b>Approved for 2010 Plan, implemented 2010-2011</b><br>Energy Conservation Improvements. Closed out 2011. | Provided \$1.5 million from the single fund MTW budget to finance comprehensive energy improvements under HUD Energy Performance Contracting, resulting in guaranteed annual cost savings sufficient to provide funding for the 20 year investment. | The Energy Performance Contract was completed in 2011, and yearly reporting is provided to HUD Field Office to verify utility savings. |

| <b>Activity<br/>09-2</b>  | <b>Description</b>   | <b>Reason Activity is closed out</b>   |
|---|--|--|
| <b>Approved for 2010 Plan Implemented 2010:</b><br>Mandatory Orientation. | Required mandatory orientation program for all new residents on the services and programs offered by the LDCHA Resident Services Office. This Activity educates residents about available services to access in times of crisis that could lead to | This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility." |



| <b>Activity<br/>09-2</b> | <b>Description</b>  | <b>Reason Activity is closed out</b> |
|--------------------------|---|--------------------------------------|
|                          | termination of their housing assistance, or as a resource for households motivated toward upward mobility, economic self sufficiency and homeownership. |                                      |

| <b>Activity<br/>09-3</b>   | <b>Description</b>   | <b>Reason Activity is closed out</b>  |
|--|--|---|
| <b>Approved for 2009 Plan Implemented 2009:</b><br>Expand case management services to MTW households. Closed out 2013. | Provide case management for households below 40% AMI to reduce barriers to employment and underemployment to maximize household's potential for securing long-term employment. | Activity 09-3 will be absorbed into Activity 10-2 to encompass a broader scope of employment support. Previous benchmark of Activity 09-3, AMI increase, will report as income per SS #1. |

| <b>Activity<br/>09-4</b>  | <b>Description</b>  | <b>Reason Activity is closed out</b>  |
|---|---|---|
| <b>Approved for 2009 Plan Implemented 2009:</b><br>Biennial recertifications for MTW households. Closed out 2015. | Conduct biennial recertifications for public housing and Section 8 participants in the MTW rent structure who are at maximum rent or 50% AMI. | This Activity has never had the anticipated impact and it resulted in increasing complexity rather than reducing staff time and achieving greater cost efficiency. This initiative is a voluntary election and is subject to fluctuating tenant income resulting in too many mid-year recertifications. In 2012 there were 102 eligible to participate and only 24 elected to skip recertification. In 2013 there were only 70 eligible households and 38 elected to skip. In 2014 it is projected there will be 111 eligible for MTW biennial recertification and only 37 will skip. This Initiative is difficult to track and creates additional administrative complexity to our program without resulting in a significant benefit to participants. |

| <b>Activity<br/>09-7</b>   | <b>Description</b>   | <b>Reason Activity is closed out</b>   |
|--|--|--|
| <b>Approved for 2009 Plan I<br/>Implemented 2009:</b><br>Homeless to Housed. | Provide housing stabilization case management for recently homeless individuals who are housed in the LDCHA's Transitional Housing (TH) program and the Jail Re-Entry (JRE) program. | This Activity requires only the MTW Single Fund Authorization. It is being closed out and discussion of annual outcomes will be included in Section V under "Activities that Will Use Only MTW Single Fund Flexibility." |

## Section V: MTW Sources and Uses of 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                   | \$ 1,330,196  |
| 70600                                 | HUD PHA Operating Grants               | \$ 6,148,972  |
| 70610                                 | Capital Grants                         | \$ 415,931    |
| 70700 (70710+70720+70730+70740+70750) | Total Fee Revenue                      | N/A           |
| 71100+72000                           | Interest Income                        | \$ 11,649     |
| 71600                                 | Gain or Loss on Sale of Capital Assets | N/A           |
| 71200+71300+71310+71400+71500         | Other Income                           | \$ 90,375     |
| 70000                                 | Total Revenue                          | \$ 7,997,123  |

### 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                 | \$1,318,530   |
| 91300+91310+92000                                       | Management Fee Expense                           | 0             |
| 91810   | Allocated Overhead                               | 0             |
| 92500 (92100+92200+92300+92400)                         | Total Tenant Services                            | \$ 145,350    |
| 93000 (93100+93600+93200+93300+93400+93800)             | Total Utilities                                  | \$ 276,332    |
| 93500+93700   | Labor  | 0             |
| 94000 (94100+94200+94300+94500)                         | Total Ordinary Maintenance                       | \$ 733,482    |
| 95000 (95100+95200+95300+95500)                         | Total Protective Services                        | \$ 27,906     |
| 96100 (96110+96120+96130+96140)                         | Total insurance Premiums                         | \$ 190,535    |
| 96000 (96200+96210+96300+96400+96500+96600+96800)       | Total Other General Expenses                     | \$ 154,923    |
| 96700 (96710+96720+96730)                               | Total Interest Expense and Amortization Cost     | 0             |
| 97100+97200   | Total Extraordinary Maintenance                  | 0             |
| 97300+97350   | Housing Assistance Payments + HAP Portability-In | \$ 3,939,587  |
| 97400   | Depreciation Expense                             | \$ 542,241    |
| 97500+97600+97700+97800                                 | All Other Expenses                               | 0             |
| 90000   | Total Expenses                                   | \$ 7,328,886  |

## Describe the Activities that Will Use Only MTW Single Fund Flexibility

### 2017 Sources and Uses of Funds Details

Lawrence-Douglas County Housing Authority has set aside MTW reserves to implement the following activities using the single fund flexibility:

**Activity: Edgewood Homes Roof Replacement**

Program Affected: Public Housing  
Year Identified: 2016  
Effective Date: January, 2017  
Funding Allocated: \$350,000 - \$375,000

**Description of Activity:**

Use the MTW Single Fund reserves to fund the replacement of the single roofs on Edgewood Home 130 unit family public housing development. The existing roofs were installed in 1992-1993 and there have been a series of leaks in this development from the roof jacks. This project is too large to be funded from the agency's Capital Fund grants without negatively impacting the ability to fund turnovers and maintenance of the remaining public housing portfolio.

**Activity: Install Speed Humps on Edgewood Lane**

Program Affected: Public Housing  
Year Identified: 2016  
Effective Date: January, 2017  
Funding Allocated: \$16,000 - \$8,000 per speed hump

**Description of Activity:**

Use the MTW Single Fund reserves to fund installation of two speed humps at Edgewood Homes to improve the safety of this family development.

**Activity: Develop Strategic Plan and Upgrade Agency Website**

Program Affected: All Programs  
Year Identified: 2016

Effective Date: January 10, 2017  
Funding Allocated: \$20,000 - \$25,000

Description of Activity: Use the MTW Single Fund reserves to review operations, develop a strategic plan for the LDCHA to streamline the agency's operation where feasible, update the agency website, and provide better functionality and improved customer service. The current website lacks the capacity for functions such as online applications. It is difficult to find basic information and there is no mobile version for the many residents with a phone but no computer. Staff time and physical resource costs will be saved by a higher functioning website that enables visitors to locate information, to fill out and submit forms online, and to access services without calling or visiting the office. The strategic plan will develop a communications plan that improves the accuracy and timeliness of information to participants and other stakeholders.

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**Activity: Provide Financial Assistance for Vehicle Repair**

Program Affected: Public Housing, Housing Choice Voucher, VASH  
Year Identified: 2010  
Effective Date: January 1, 2011  
Funding Allocated: \$20,000 (estimated)

Description of Activity:

Provide up to \$500 per household for vehicle repair to assist MTW households to obtain or retain employment, employment training, or attend postsecondary education.

**Activity: Partner with Douglas County Housing Incorporated (DCHI), to create the Full Circle youth program.**

Program Affected: Public Housing, Housing Choice Voucher, VASH  
Year Identified: 2010  
Effective Date: January 1, 2011  
Funding Allocated: \$50,000 (estimated)

Description of Activity:

Use DCHI, an affiliated nonprofit, to pursue private and public foundation grant funding that is restricted to nonprofit organizations in order to expand program opportunities and activities for LDCHA youth, particularly the children of parents participating in the MTW program. The Full Circle youth program provides year-round social, educational, health and recreational opportunities for youth.

**Activity: Expand employment related services to MTW households.**

Program Affected: Public Housing, Housing Choice Voucher, VASH

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$175,000 (estimated)

**Description of Activity:**

Provide funding for technical training, education, certifications, employment counseling and childcare services to permit heads of household to seek, obtain and retain employment. This Activity is designed to reduce the barriers to employment and under-employment, to maximize a household's potential for securing long-term employment.

**Activity: Homeless to Housed.**

Program Affected: Public Housing and Housing Choice Voucher

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$40,000 (estimated)

**Description of Activity:**

Provide housing stabilization case management for recently homeless individuals who are housed in the LDCHA's Transitional Housing (TH) program and the Jail Re-Entry (JRE) program.

**Activity: Mandatory Orientation**

Program Affected: Public Housing and Housing Choice Voucher

Year Identified: 2008

Effective Date: January 1, 2009

Funding Allocated: \$300 (estimated)

**Description of Activity:**

Required mandatory orientation program for all new residents outlining the services and programs offered by the LDCHA Resident Services Office. This Activity educates residents about available services to access in times of crisis that could lead to termination of their housing assistance, or as a resource for households motivated toward upward mobility, economic self-sufficiency and homeownership.

**General Statement on Sources of Funds**

Since the 2017 allocation for HUD funded programs cannot be known at this time, the amounts listed for Public Housing Operating Subsidy and Section 8 HCV Budget Authority Renewal are based on 2016 funding allocations. For Capital Funds the allocation is based on the 2016 grant funding award.

**General Statement on Uses of Funds**

The uses of funds shows the aggregate expenses for all MTW programs the agency will operate by account and not program. However each individual program operated by the LDCHA contains a program specific budget.

The LDCHA plans to use funds in 2017 for intended purposes of the specific federal and resident services programs even though it will operate its Public Housing, Section 8 assistance and Capital Fund as a single fund budget with full flexibility. The agency will not reduce the number of public housing and Section 8 assisted units it has in 2017. Any development will be paid for through MTW reserves or leveraged funds. Public Housing, Section 8 and Capital Funds, as a single fund will be used to pay for the administrative, operational, maintenance costs and capital fund improvements of the respective program which includes previously approved MTW Activities.

Since all of the agency's public housing and Section 8 HCV units/households are in the MTW program, even though not all households participate in the alternative rent structure and work requirement, these programs are listed as MTW activities in the sources and uses.

Any surplus funds remaining at the end of 2017 will be used for MTW purposes outlined in the 2017 Plan and subsequent years.



## V.2.Plan.Local Asset Management Plan

### B. MTW Plan: Local Asset Management Plan

#### Asset Management

The LDCHA has 369 public housing units and opted out of the asset management requirement under the 2008, 2009, 2010 and 2011 HUD appropriations Act, and as provided for in 2012 and 2013 Continuing Resolutions. LDCHA elected to opt out of asset management for 2014 and 2015 pursuant to the FY 2014 Omnibus Appropriations Act and to the Consolidated and Further Continuing Appropriations Act of 2015. The agency will continue to elect to opt out again if provided that opportunity for 2017. The LDCHA uses a cost allocation system to prorate expenses among the different programs it administers.

Is the PHA allocating costs within statute?

YES

or

NA

Is the PHA implementing a local asset management plan (LAMP)?

N/A

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?

N/A

or

No

N/A

## **Section VI: Administrative**

### **A. Board Resolution**

Resolution 2016-17 was approved by the Board of Commissioners adopting the 2017 Annual MTW Plan on September 26, 2016. It and the Certification of Compliance are included in Appendix II.

### **B. Public Participation / Comment on the 2017 MTW Plan**

#### Resident Advisory Committee, June 16 and July 21, 2016

The LDCHA Resident Advisory Committee participated in the development of this plan and recommended this Plan for approval on July 21, 2016.

#### Notice of Public Hearing and Comment Period

#### **PUBLIC NOTICE**

Additionally, the LDCHA's Draft MTW Annual Plan for 2017 was available to the public for review and comment during a 30-day period beginning August 1, 2016 and ending at 4:00 pm September 1, 2016.

During the public comment periods the Draft MTW Annual Plan for 2017 was available on the LDCHA website and printed copies of the Plan were available at City and County Offices and all the agency's administrative and management offices. The location of copies and the public hearing were advertised in public notices published in the Lawrence-Journal World newspaper and the LDCHA website on August 1, 2016

The public was invited to comment on the Plan in writing, delivered or mailed to Lawrence-Douglas County Housing Authority, 1600 Haskell Avenue, faxed to 842-9596, or emailed to [housing@ldcha.org](mailto:housing@ldcha.org). Comments were received up to 4:00 p.m. September 1, 2016.

A public hearing on the Plan was held September 1, 2016 at 5:00 pm at the Administrative Offices of the agency at 1600 Haskell Avenue.

No comments were received during the comment period. No members of the public attended the public hearing which was opened at 5:00 pm and closed at 5:20 pm.

### **C. Agency Directed Evaluation of the Demonstration**

None at this time.

#### **D. Statement of Significant Amendment or Modification**

LDCHA considers a "significant amendment or modification" as a discretionary change in a plan or policy of the agency that fundamentally alters the plan or policy, and which will require the formal approval of the Board of Commissioners. Specifically the following will be considered to constitute a significant amendment:

- A material change in the policies regarding the manner which tenant rent is calculated,
- A material change in the admissions policy, or
- Any change with regard to demolition or disposition, homeownership, Capital Fund financing, conventional or mixed financing development are considered significant amendments to the Capital Fund 5-Year Action Plan.

Changes that result from HUD regulatory requirements will not be considered a significant amendment or modification to either the 5-Year Capital Fund Action or MTW Annual plans.

Significant changes to the LDCHA MTW Program as defined by HUD Form 50900 will be made through a MTW Plan amendment as approved by HUD.

#### **E. Declaration of Trusts**

The LDCHA filed Declaration of Trusts with the Douglas County Register of Deeds on all its public housing and agency owned housing on different dates over the years at the time the deeds were first filed with the registrar. The LDCHA has nine separate housing developments. Each deed was filed with a Declaration of Trust.

#### **F. Resident Commissioner**

The LDCHA is in compliance with the requirement that the agency have a commissioner who is a resident of one of the agency's housing programs. Maria Duran, who is a public housing participant, is the resident commissioner. Ms. Duran was appointed to the Board by the Mayor of Lawrence for a four year term in July 2016. The LDCHA's previous Resident Commissioner, Brenda O'Keefe, served for 11 years and her term expired in June, 2016.

## **Additional Appendix Items**

|                     |  |
|---------------------|--|
| <b>Appendix I</b>   | <b>LDCHA's MTW Demonstration Program</b>               |
| <b>Appendix II</b>  | <b>Certifications and Declarations, and Forms</b>      |
| <b>Appendix III</b> | <b>Capital Fund Performance and Evaluation Reports</b> |

## Appendix I:

### LDCHA's MTW DEMONSTRATION PROGRAM

The LDCHA submits Appendix I to provide a comprehensive outline of its Moving to Work (MTW) program elements that have been developed over its 15 years of participation in the MTW Demonstration through various MTW Plans submitted to HUD. Additionally, significant data of its MTW Program, maintained since the inception in 1999, will continue to be collected and presented with its annual reports.

The LDCHA merged the Public Housing and Section 8 Housing Assistance programs into one housing program called General Housing Assistance with one waiting list and two forms of assistance. A household whose name comes to the top of the waiting list is offered the first form of assistance available. An applicant is allowed to pass but will be assessed a pass penalty and moved down the waiting list to the date of the offer. Once an applicant has received an offer of all forms of housing and passes they are dropped from the waiting list.

All applicants for General Housing Assistance must meet suitability criteria as well as income eligibility criteria. Applicants with no prior rental experience can qualify by completing the Renter Education Program, the goal of which is to teach applicants various duties, responsibilities and rights as a leaseholder.

The agency developed an MTW rent structure that requires all non-elderly, non-disabled adults to pay a significant minimum rent regardless of their income. The LDCHA's rent structure goal was intended to move participants to work by making them responsible for paying a meaningful rent, high enough to require work but low enough to be affordable. To reward work, the agency set a maximum, or ceiling, rent for each unit by bedroom size. To encourage employment advancement the agency established a system of income deductions that increase as hours of work increase. The LDCHA's MTW rent structure requires a significant minimum payment regardless of income and caps rent as income rises to encourage upward economic mobility. The minimum and maximum MTW rents are adjusted periodically by Board resolution.

Minimum and maximum MTW rents are:

| Bedroom Size | Minimum | Maximum |
|--------------|---------|---------|
| 1 Bedroom    | \$ 185  | \$ 435  |
| 2 Bedroom    | \$ 215  | \$ 500  |
| 3 Bedroom    | \$ 255  | \$ 575  |
| 4 Bedroom    | \$ 275  | \$ 665  |
| 5 Bedroom    | \$ 315  | \$ 690  |

Actual MTW monthly rent is determined by:

- annualizing total household income
- subtracting allowable deductions
- multiplying the sum by 30%
- dividing the amount by 12

Income deductions for MTW households include:

- 10% earned income deduction for those working at least 35 hours/week
- \$2,000 medical deduction for those working at least 35 hours/week
- full out-of-pocket dependent care deduction necessary to allow work or school attendance
- utility allowance as an annual income deduction, not as a monthly deduction from rent
- increase in the child dependent deduction to \$840 per child capped at \$1,680 per household

If the final amount is less than the minimum rent for the bedroom size occupied by the household, the annual rent is increased to the minimum. If it is higher than the maximum rent, it is lowered to the maximum. If it falls between the minimum and maximum, it is set where it falls. Section 8 households may pay a rent higher than the maximum if they select a unit with a contract rent that exceeds the payment standard.

#### Application of MTW Rent Structure

The alternative MTW rent policy and work requirement apply to all households in the General Housing program with a non-disabled adult age 50 or younger in the household. Exempt households may elect to participate in the MTW rent structure if they meet the work requirement through employment income. There are limited exemptions permitted, as follows:

- A person over age 62 or who has a permanent disability that prevents them from getting and/or keeping employment.
- A person under age 62 and over 18 who is the only caretaker for a disabled/elderly household member.
- Discretionary exemption for households with only one adult who does not have disability status, who is over age 40, and/or who, due to limitations of employment experience, education or training, is unable to earn sufficient income to meet the rent requirement.
- Households with one or two adults, neither of whom have disability status, who are over age 50, and who do not have children residing in the household.
- Households receiving TANF Cash Assistance with one adult member who has been determined "not mandatory for work" by SRS. The household will receive assistance under the MTW rent structure, but the person will not be subject to the work requirement. This includes persons receiving TANF Cash with a child under 6 months of age and households with more than one adult when one of the adults is needed in the home to care for a person with disabilities.

#### Annual Rent

An important component of the LDCHA's MTW rent structure is the feature of Annual Rent or Fixed Rent. Rent is fixed for one year and does not change, regardless of changes in household income or composition except in instances where a household permanently loses income through death, divorce, or when an income producing adult child whose income was included in the rent calculation moves out of the household.

### Work Requirement

The work requirement mandates that all able-bodied adults age 18 and older work a minimum of 15 hours a week. For a two-adult household with minor children, the work requirement can be met if one adult works 35 hours per week. Enrollment in a post secondary education program or Work Training Program satisfies the work requirement. An adult child in the household is also subject to the work requirement. Residents who fail to meet the work requirement must participate in the LDCHA's Family Self-Sufficiency Program 15 hours per week. Failure to meet the work requirement is a major program breach.

### Other Approved Rent Reform Elements of the Rent Structure

Section 8 portability is restricted. MTW households may not move outside the LDCHA's jurisdiction unless the household applies for and receives an exception from this rule as a reasonable accommodation for a disability or other good cause, such as taking a job in a different city, education, or other household need. Households porting into the LDCHA's jurisdiction must participate in the MTW program, unless exempt.

Households that have both elderly/disabled members and non-disabled adult members are considered mixed eligibility households and are placed in the MTW rent structure.

Flat rents are not applied in the MTW rent structure, and MTW participants are not eligible for the flat rent option.

### Rent Hardship Policy

The LDCHA's Rent Hardship Policy permits a degree of rent relief if the household experiences a loss in employment income or medical illness. Under the policy, a household may be re-certified to a \$50 or \$100 monthly rent based on the nature and amount of the income loss. The rent reduction is for a period not to exceed three months. A household may have a hardship rent reduction only once every 12 months, measured from the completion of any prior hardship .

If the household's income loss is due to a condition that then qualifies the individual for a disability under ADA, the household's designation is changed from MTW to income-based and they are then recertified.

### Homeownership

Households who have an annual gross income that exceeds 50% of the Area Median Income (AMI) are offered an opportunity to join the homeownership program.

The LDCHA will provide a \$3,000 matching grant for down payment or closing costs for households that complete the Homeownership Program and purchase a house. Households participating in the Homeownership Program that have income between 80%-99% of AMI are allowed to pay the MTW maximum rent for three to five years or until they purchase a home. Households who do not join the homeownership program may remain in their public housing unit until their gross annual income reaches 80% AMI at which time they become responsible for paying the full market rent without subsidy. The LDCHA encourages households to leave the housing assistance program when a household's gross annual income reaches 100% AMI, so that higher income households not interested in purchasing a house will move into the private rental market, thereby opening up units of affordable housing for households at or below 80% of AMI.

Households participating in Section 8 voucher must leave the program when their rent obligation equals the full contract rent for their unit for six consecutive months. This is a provision of the Section 8 Housing Assistance Payment contract which serves as a term limit for higher income households.

Public housing households that reach 100% of AMI at the annual recertification will be given a 6 month notice to vacate. If the household has not provided the LDCHA with notice of a pending home purchase, the household will not be eligible for the homeownership down payment match. This will result in Section 8 HCV and public housing households being treated the same.

#### Alternate Rent Historic Outcomes

| Avg Gross Income / Participants / Homeownership | MTW YEAR               | AVG GROSS IN-COME | AVG TEN-ANT RENT | AVG HAP TO OWNER | AVG CON-TRACT RENT | AVG FAM-ILY SIZE | MTW RENT PARTI-CI-PANTS | HOME-OWNER-SHIP |
|---|------------------------|-------------------|------------------|------------------|--------------------|------------------|-------------------------|-----------------|
| <b>BASELINE</b><br>Year 2                       | 2000 - 2001 YR 2       | 16,434            | 296              | 213              | 622                | 3                | 391                     |                 |
|   | 2001 - 2002 YR 3       | 16,660            | 303              | 223              | 653                | 3                | 401                     | 1               |
|   | 2002 - 2003 YR 4       | 17,967            | 288              | 375              | 676                | 3                | 517                     | 5               |
| <b>BENCHMARK</b><br>Increase metrics over time  | 2003 - 2004 YR 5       | 19,564            | 329              | 378              | 731                | 3                | 492                     | 5               |
|   | 2004 - 2005 YR 6       | 19,901            | 332              | 403              | 737                | 3                | 479                     | 5               |
|   | 2005 - 2006 YR 7       | 19,274            | 324              | 436              | 768                | 3                | 450                     | 2               |
|   | 2006 - 2007 YR 8       | 20,372            | 349              | 422              | 786                | 3                | 456                     | 9               |
|   | 2007 - 2008 YR 9       | 21,625            | 368              | 439              | 814                | 3                | 440                     | 5               |
|   | 2008 - 2009 YR 10      | 20,446            | 367              | 499              | 874                | 3                | 426                     | 7               |
|   | 2010 YR 11             | 19,776            | 358              | 510              | 872                | 3                | 411                     | 7               |
|   | 2011 YR 12             | 19,793            | 355              | 513              | 870                | 3                | 411                     | 3               |
|   | 2012 YR 13             | 21,060            | 376              | 551              | 929                | 3                | 477                     | 8               |
|   | 2013 YR 14             | 22,558            | 388              | 539              | 937                | 3                | 478                     | 7               |
|   | 2014 YR 15             | 23,937            | 411              | 521              | 950                | 3                | 472                     | 5               |
| OUTCOME   | 2015 YR 16             | 27,429            | 424              | 526              | 961                | 3                | 485                     | 10              |
|   | <b>OVERALL AVERAGE</b> | 20,253            | 351              | 436              | 812                | 3                | 452                     | 6               |



## **Appendix II**

### **Certifications and Declarations**

- Board Resolution 2016-17 Adopting 2017 Annual MTW Plan
- Certification of Meeting MTW Statutory Requirements and Public Notices
- Certification of a Drug-Free Workplace
- Disclosure of Lobbying Activities
- Affidavit of Publication for Public Notice Ad
- Landlord on-Site Verification and Re-Inspection Form