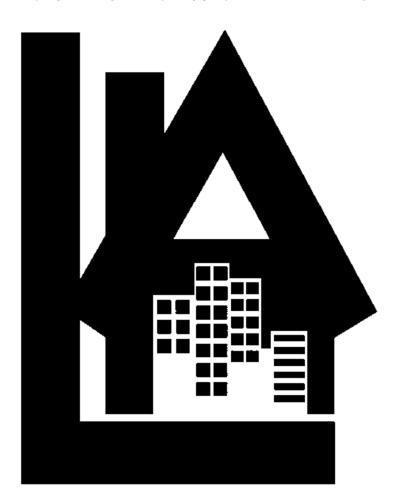
# FY2017 MOVING TO WORK ANNUAL PLAN



# **Lexington Housing Authority**

Submitted July 29, 2016

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# TABLE OF CONTENTS

Section I – Introduction	1
Section I – Goals	1
Section II – Operating Information	7
Section III – Proposed MTW Activities	12
Section IV – Approved MTW Activities	24
Activities Not Yet Implemented	35
Section V – Sources & Uses of Funds	40
Section VI – Administrative	42
LHA Board Resolution	43
Certification of Compliance	44
Public Comment Documents	46
Evaluation	49
Annual Statement/Performance and Evaluation Report	50
Appendix A – Hardship Policy	63
Appendix B – Hardship Policy (Activity 17)	64

#### **SECTION I**

#### **INTRODUCTION**

The Lexington-Fayette Urban County Housing Authority (LHA) submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011 with the execution of an MTW Agreement between HUD and LHA. In April 2016, HUD extended the agreements of all 39 MTW agencies until 2028. The LHA is excited to know that the opportunity to be forward thinking and innovative will continue to shape the direction of affordable housing in Lexington.

The LHA was established in 1934 to provide safe and desirable affordable housing to low and moderate-income individuals and families while partnering with community agencies to promote increased self-sufficiency and a higher quality of life for its residents. LHA presently manages 1,097 public housing units and 2,659 Housing Choice Voucher (HCV) tenant-based and project based vouchers, 337 special purpose vouchers throughout the Lexington community as well as 201 units that fall outside of Section 8 (HCV) and 9 (public housing) authority. In total, LHA can serve 4,292 households at full occupancy.

The Authority is governed by a Board of Commissioners, a group of dedicated citizens and local officials appointed in accordance with state housing law, who establish and monitor agency policies and are responsible for preserving and expanding the Authority's resources and ensuring the Authority's ongoing success.

The mission of the Lexington-Fayette Urban County Housing Authority (LHA) MTW Program is to:

Serve as a prudent financial steward of federal, state and local resources, endeavoring to more effectively provide safe and desirable affordable housing, while furthering the self-sufficiency of families within Lexington-Fayette County.

#### SHORT TERM GOALS

# **Improve Public Housing Occupancy**

Traditionally the LHA has maintained public housing occupancy at or above 95%. However, in recent years occupancy rates have dipped at public housing sites to 89% (976 occupied/of 1097 units) in recent months. Staff has cited various reasons for the decrease in occupancy: Housing Choice Vouchers being made available in jurisdictions in close proximity to Lexington with low-income families applying for and receiving vouchers in counties close to Lexington, and; the LHA's requirements for self-sufficiency units which make up 77% of the LHA's public housing

stock were restrictive, dictating that the head/co-head/spouse have 6 months of consecutive employment history and currently be employed at application. An amendment to the FY2016 Annual Plan in early 2016 relaxed the occupancy/admissions requirement from 6 months of consecutive employment history to 3 months of consecutive employment history. In addition, 12 months of landlord history was eliminated and now landlord history can be determined to be satisfactory by housing management without time constraints. These two adjustments were made in early 2016 therefore staff expects to see improvement throughout FY 2017 in the number of applicants who meet admissions requirement for Self-Sufficiency I & II units.

#### **Lease-Up Centre Meadows**

The LHA's public housing management Team I is in the process of leasing up 206 units at Centre Meadows. The Centre Meadows site (formerly Pimlico) was converted to project-base vouchers (PBV) through the Rental Assistance Demonstration (RAD) and underwent major renovation that closed the site since March of 2013. Staff begin leasing units at Centre Meadows as half of them were released back to the LHA in December 2015. The remaining 103 units were released to the LHA in March 2016. At press time, 70 units had been leased and occupied at the site. LHA staff anticipates that all 206 units will be fully leased by the start of FY2017 (July 1, 2016).

# **Waiting List**

In March 2016 there were 9,098 applicants on the waiting list for both public housing and the Housing Choice Voucher programs. The agency's HCV waiting list was opened temporarily August 31, 2015 – September 4, 2015. From that opening the LHA selected 1,500 randomly selected applicants to complete the eligibility process. Staff anticipates seeing all of those applicants over a 24-month period. The LHA will open the waiting list for all housing programs as necessary during FY2017 to address vacancy issues. The waiting list for two and three bedroom self-sufficiency units in public housing is presently open but is opened and closed as necessary throughout the year. In addition, the waiting list for Centre Meadows is currently open and will remain open until the site is completely occupied.

# **Special Partner Programs**

During FY2017 the LHA plans to modify the special partner program agencies identified in activities 10 and 12. Through MTW Activity 10, two social service agencies provide stable tenant-based voucher assistance and special services to those households. These agencies provide wraparound services in order to stabilize a household's situation to increase self-sufficiency.

Greenhouse17, one of the above mentioned special partner programs, receives assistance for 25 vouchers. This agency is developing fixed units that are scheduled to be complete in October 2016. The LHA has agreed to allow Greenhouse17 to receive the monthly "block grant" funding for the housing subsidy.

Additionally, the LHA has added one single-family unit being utilized as permanent housing for homeless families with children. The property is owned by the LHA and the first year's rent is funded by the Lexington-Fayette Urban County Government Office of Homelessness Prevention and Intervention (OHPI). Families must agree to participate in case management services to remain in the unit. After the initial year of occupancy, the LHA proposes that the family

occupying this unit will be provided a tenant-based voucher by the LHA to continue to live in the property or move elsewhere. Therefore, after the initial year, the LHA proposes to include this property as a special partner program receiving a monthly rental subsidy. Activity 12 has been revised with details of this program.

Activity 12 – will require that Greenhouse17 enter into a Memorandum of Understanding (MOU) with the LHA to provide designated, fixed housing to low-income families while receiving a monthly rental subsidy requiring that participants reside in designated service-enriched housing units in order to receive rental subsidy. Greenhouse17 will continue to have authority under Activity 10 until their fixed units are available for occupancy, at that time Greenhouse17 will have the authorizations associated with Activity 12.

The LHA's FY2014 Annual Plan proposed the following language for Activity 12:

The LHA has no plans at this time to expand either the number of special partners receiving funding or the amount of funding each receives. Should the Housing Authority decide to add additional special partners in the future, publicly available planning and/or assessment documents such as the city's Consolidated Plan and the Department of Social Services' Lexington Social Service Needs Assessment Report, will be used to determine the unique special populations most in need of subsidized housing that includes on-site supportive services. A public Request for Proposals (RFP) process will then be used to select non-profit partners that serve these populations.

The LHA requests the authority to waive the RFP process for Greenhouse17 because their funding will not exceed the 20% of HCV Program funding for special partners. In addition, this special partner has been included in our special partner programs since FY2012-13 and no planning and/or assessment documents should be necessary to determine this population's need for subsidized housing.

#### **Initiatives to House Veterans**

The LHA is committed to serving veterans in need of affordable housing. The LHA currently provides 282 Housing Choice Vouchers for the Veterans Affairs Supportive Housing (VASH) Program. Through VASH, participating veterans receive a voucher and case management services provided by the local VA Hospital.

During FY2016, the LHA made an additional 75 vouchers available for families that include an adult household member who is a veteran. In addition to veterans receiving a preference on the HCV and public housing waiting list, the LHA has created and filled two housing navigator positions who devote their time to assisting veterans in securing permanent housing. Both positions are licensed clinical social workers with specialized skills needed to work with homeless veterans. The navigators assist veterans through the leasing process as well as working with landlords and performing inspections to expedite leasing. In March of 2016 the navigators coordinated a landlord recruitment luncheon to provide information about HCV and housing

veterans. Through these efforts, the LHA plays an integral part in ending homelessness for veterans in Lexington.

#### **Family Self-Sufficiency Program**

Currently the LHA is revising and combining the Action Plans for both the HCV and public housing Family Self-Sufficiency (FSS) Programs. So many requirements for the HCV and public housing programs are identical, it makes sense to combine the two separate plans into one document. Instances where there are differing requirements have been clearly indicated. The FSS Program seeks to assist participants in achieving self-sufficiency. The LHA defines self-sufficiency as a participant that is able to supply for their own needs with reduced need for subsidy. To assist the client in achieving self-sufficiency the Housing Authority will provide client-centered policies and practices to optimize the FSS participant's living condition. The LHA plans to use single-und flexibility to offer incentives for goal achievement and homeownership.

# LONG TERM GOALS

To ensure LHA's participation in the MTW demonstration program meets the specific needs of the Lexington-Fayette community, the agency will continue to craft local initiatives to address long term needs and meet the following MTW objectives:

- 1. To reduce costs and achieve greater cost effectiveness in federal expenditures;
- 2. To give incentives to families with children where the head of household is working; is seeking work; or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- 3. To increase housing choices for low-income families.

Specifically, the LHA continues to seek ways to not only provide affordable housing but to provide the tools needed for continued self-sufficiency success for residents. Our efforts at collaborating with service providers who can offer support to our clients continues to grow. The LHA has created the Self-Sufficiency Through Resident Involvement Vision and Education (STRIVE) Program was created to reward LHA residents for success. STRIVE was piloted to elementary school students attending summer school who lived at one of the LHA's newest HOPE VI developments in the summer of 2014. At the end of the session, students were rewarded for their achievements with gifts. The LHA continues to seek community partners to join in expanding this program.

As renovation of Centre Meadows (formerly Pimlico) is now complete and lease-up is underway, the LHA is looking further into the future and evaluating its past development strategies and synthesizing new approaches. Two large developments remain in the LHA's housing stock that

require major rehabilitation – 183-units at Connie Griffith Towers and 134-units at Ballard Towers, two elderly high-rise buildings that sit side by side. Although Griffith Towers is a public housing property, Ballard Towers' designation is slightly more complicated. Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a tax-credit entity until October 20, 2015 when the property exited tax credit compliance and is now solely owned by the Ballard, LLC, a LHA controlled entity. The LHA is weighing the possibility of Voluntary Conversion for Connie Griffith Towers and continues to seek a funding mechanism for Ballard Towers. LHA is eager to develop alternative strategies besides competitive grant applications that don't leave the Authority possibly waiting for years for its turn at highly competitive and extremely limited funds.

Looking beyond the rehabilitation needs of sites like Connie Griffith and Ballard Towers, the agency is focusing on the acquisition and development of smaller sites, typically only a half-dozen units or less. This kind of work requires that the Housing Authority must be able to adjust to continuously shifting local market conditions and act swiftly when a promising site becomes available. The flexibilities provided by the MTW demonstration, including single-fund fungibility and a streamlined acquisition process, will better position LHA to take advantage of opportunities as they appear.

As part of the future rehabilitation plans at smaller sites, LHA will explore the concept of "flexible floor plans." Flexible floor plans will allow LHA to seamlessly adapt to the constantly changing demographics of residents without expensive unit reconfigurations, using these units alternately as either multi-bedroom homes or one-bedroom apartments.

To further MTW statutory objectives below; the LHA has sought and received HUD approval to implement 17 MTW activities since entering the program in 2011. Through the submission of the FY2017 Plan, the Authority seeks approval of four new activities. The chart below summarizes the LHA's MTW activities: (The numbers in the statutory objectives column of the table corresponds with the numbered descriptions below.)

#### **Statutory Objectives**

- 1. To reduce costs and achieve greater cost effectiveness in federal expenditures;
- 2. To give incentives to families with children where the head of household is working; is seeking work; or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
- 3. To increase housing choices for low-income families.

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Implemented agency- wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
	After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents			-
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Ongoing	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 Significantly Modified	Implemented FY2015 w/ Emphasys Elite Software	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013		3
8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013 -FY2014 Significantly Modified	Modified in FY2014 - Pimlico Converted to PBV w/ RAD/Not Implemented	3
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Implemented Resources used for RAD revitalization of Pimlico	3
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014 Significantly Modified	Ongoing	3
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Implemented until/ necessary for emergency capital repairs	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014	Ongoing	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing Implemented April 1, 2014	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Discontinue in FY2017	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Ongoing	1
18	Streamlined HQS Inspection of LHA- Owned/Controlled Property	FY2017	Proposed	1
19	Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	FY2017	Proposed	3
20	Assign Project-Based Vouchers To LHA Owned and Controlled Units Without Bid Process	FY2017	Proposed	3
21	Triennial Certifications For HCV Homeownership Participants (Rent Reform)	FY2017	Proposed	1

# SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION

	(II) General Housing Authority Operating Information										
Annual MTW Plan											
						11.	.1.Plar	n.HousingSt	tock		
				А	. мт	W Pla	an: Ho	ousing Stoc	k Information		
		PI				c Hou	sing Ur		ded During the Fi		FAS Units
AMP Name and Number	С	0 1	Bed 2	3	Size 4	5	6+	Total Units	Population Type *	Fully Accessible	Adaptable
PIC Dev. # /AMP	o	O	o	o	o	o	0	0	Type Noted *	o	o
PIC Dev. # /AMP PIC Dev. Name PIC Dev. # /AMP	O	0	0	0	0	0	0	0	Type Noted *	0	0
PIC Dev. Name PIC Dev. # /AMP	0	0	0	0	0	0	0	0	Type Noted *	0	0
PIC Dev. Name	0	0	0	0	0	0	0	0	Type Noted *	0	0
To * Select Population		iblic Ho						erly/Disabled.	0 Other		
Jeicet Cp									opulation type ser	rved	
			Planne	ed Pub	olic Ho	ousing	Units 1	to be Remov	ved During the Fis	cal Year	
PIC Dev. # / AMP and PIC Dev. Name		Num	ber of Rem	f Units noved	to be				Explanation	n for Removal	
Connie Griffith			1	.83			The	LHA plans to	apply for Volunta	ary Conversion for	this development.
PIC Dev. # /AMP PIC Dev. Name				0					r	N/A	
PIC Dev. # /AMP PIC Dev. Name				0					r	N/A	
Total Number of Units to be			1	.83							
Removed	_					<u></u>	_				
		Nev	v Hou	sing C	hoice	Vouc	hers to	be Project-	Based During the	Fiscal Year	
Property Name	-	of N	icipate New Vo Projec	ouche	rs to	_			Descriptio	on of Project	
Connie Griffith			1	.83					n elderly high-rise for Voluntary Con		ng that the LHA is 2017.
The LHA plans to apply for Set-Aside Funding for VASH PBV's for up to 150 units during FY2017. LHA is still investigating the need for these vouchers with input from the local VA hospital. (This inumber is not counted in the 'Anticipated Total # of PBVs Leased Up or Issued to a Potential Tenant at VASH PBV 150 the End of the Fiscal Year below.) The LHA owns a parcel of land at Glenn Arvin Avenue where 10 new units will be constructed using city and state funds to provide permanent housing for homeless families. The Housing Authority plans to assign PBVs to these units. The LHA will proceed with these units if the Set-Aside HUD VASH PBVs are not awarded.											
VASH PBV	4			0					1	N/A	
VASH PBV Property Name				0		N/A			r	N/A	
				Anticipated Total New Vouchers to be Project-Based  Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End							

# Other Changes to the Housing Stock Anticipated During the Fiscal Year N/A 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

1408-Mgmt. Improvements-PHA Wide software upgrades \$156,064
1410-Administration-PHA Wide Capital Fund Fee \$111,474
1430-Fees and Costs-PHA Wide A & F Fees \$111,474
KY004000001-Bainbdge-PineVly-Const: Dwelling Structure interior im

KY004000001-Bainbdge-PineVly-Const: Dwelling Structure interior improvements-doors, storm doors, windows \$84,140 KY004000002-Unnamed: Site improvements-Fencing; Dwelling unit door replacement; steps repair/replacement \$145,100

KY004000003-Unnamed: Window repair/replacement; bathroon repair/replacement \$63,815

KY004000004-CG: Energy Management System Replacement \$25,517

KY004000007 Homownership: Bldg. ext. painting; exterior steps, porches, door, stairway repair/replacement \$26,698

KY004000008 Sugar Mill: Building exterior painting \$21,502

KY004000010-BG Apartments: Brick dumpster enclosure; Dwelling structure exterior repair; Power Lift \$24,836

KY004000011 Bluegrass Phase II: Site exterior fencing repair/replacement; Power Lift \$12,627

KY004000013-BG Phase III: Dwelling structure exterior repair; Power Lift \$31,567

KY004000015-Bridlewood Apts.: Landscape erosion repair; sidewalk,driveways,apron rep., MF bldg. oor repairPower Lift \$22,164

KY004000028 Falcon Crest: Building exterior painting \$33,656

KY004000033-Grand Oaks Apts.: Landscape erosion repair; sidewalk,driveways,apron rep., MF bldg. oor repairPower Lift \$21,164

#### II.2.Plan.Leasing

#### B. MTW Plan: Leasing Information

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

Planned

#### Planned Number Number of Unit MTW Households to be Served Through: of Households to Months be Served\* Occupied/ Leased\*\*\* Federal MTW Public Housing Units to be Leased 1097 13164 Federal MTW Voucher (HCV) Units to be Utilized 2611 31332 Number of Units to be Occupied/Leased through Local, Non-Traditional, 1 12 MTW Funded, Property-Based Assistance Programs \* Number of Units to be Occupied/Leased through Local, Non-Traditional, 438 5256

Total Households Projected to be Served

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

MTW Funded, Tenant-Based Assistance Programs \*\*

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup>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.

LHA is currently in compliance with 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	Public Housing occupancy is down due to waiting list being depleted of eligible applciants for self-sufficiency sites that have a work requirement. The LHA has outlined steps being taken to address the issue in the short term goals of the FY2017 MTW Annual Plan.					
N/A	N/A					
N/A	N/A					

#### 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			
Public Housing	Community-Wide	5686	Partially Open	Yes			
Housing Choice Voucher	Community-Wide	1684	Partially Open	Yes			
Non-Traditional MTW Houising Assistance	Program Specific	7	Open	Yes			

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.

Public Housing - waiting list is open for the general public and Connie Griffith Towers waiting list is Elderly only.

Housing Choice Voucher - waiting list is open for the general public, Centre Meadows (a PBV site) applicants

Non-Traditional MTW Housing Assistance - waiting list is open for special program partner programs

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

Canaan House - Individuals who have been diagnosed with a mental illness;
 Urban League of Lexington-Fayette County Elderly Individuals;
 New Beginnings - Individuals who have been diagnosed with a mental illness;
 OASIS Rental Assistance
 Housing Program - Families in need of financial literacy, credit management, and homeownership resources

5) One Parent Scholar House - Single parents who are full-time students in a post-secondary educational institution; 6) Greenhouse17 - for victims of domestic violence

7) HOPE Center - Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment; 8)Serenity House Place - Parents with children: who have recently been released from jail, are homeless and who are substance abuse treatment program graduates

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									
N/A									
	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								

SECTION III - Proposed MTW Activities: HUD Approval Requested

Activity 18 - Streamline HQS Inspection of LHA-Owned/Controlled Property

# **Description**

The LHA proposes to have the LHA's Housing Choice Voucher (HCV) inspectors perform HQS inspections of LHA-owned property or affiliates that receive HCV assistance rather than a third-party inspector. Currently, HCV inspectors from other jurisdictions perform HQS inspections on LHA-owned properties or affiliates, which slows the leasing process. In cases where the property is a tax credit entity, the property is being inspected by LHA public housing management staff in addition to an HQS inspection. Staff believes this authority will allow for more efficient use of staff time and expects unit turn around to be expedited.

#### **Meets Statutory Objective**

Achieve greater cost effectiveness in federal expenditures. Agency cost savings in this activity is not the result of staff time savings but instead increased efficiency.

# **Anticipated Impact of Activity on Statutory Objectives**

The activity relates to the statutory objective to achieve greater cost effectiveness in federal expenditures by eliminating the need for third-party inspection of LHA units that are designated for HCV. The LHA does not anticipate a decrease in the cost of an inspection but rather time savings to housing management staff that will allow for more efficient use of time for other housing management responsibilities.

#### **Schedule for Achieving Objective**

Upon HUD approval LHA would immediately begin allowing LHA's HCV inspectors perform HQS inspections on LHA and LHA affiliate units that receive HCV assistance. The HCV manager and assistant manager will perform quality control inspections during the year. Units will be randomly selected that have been inspected within the last 90 days. If deficiencies are found the landlord is notified to correct the deficiency and the inspector who initially did the inspection is interviewed to respond to the deficiency. If needed, the inspector may be required to obtain additional HQS training or a review of HQS procedures.

#### **Standard HUD Metrics**

CE 1: Agency Cost Savings							
Unit of Measure: Cost Per HQS Inspection of LHA-Owned/Controlled Units							
Baseline	Benchmark	Outcome	Benchmark Achieved				
Total Cost of task prior to implementation of the activity.	Expected cost of the task after implementation of the activity.	Actual Cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.				
\$744	^744*						
Cost Per HQS Annual Inspection = \$24.00 X 31 HQS Inspections (Annuals, Interims, Complaint)	\$744*	TBD	TBD				

<sup>\*</sup> The LHA does not anticipate a decrease in the cost of an inspection but a more efficient use of time.

CE 2: Staff Time Savings							
Unit of Measure: Staff Time to Complete HQS Inspection							
Baseline	Benchmark	Outcome	Benchmark Achieved				
Total Time to Complete the Task in Staff Time (decrease)	Expected amount of staff time dedicated to the task after implementation of the activity (in hours).	Actual staff time dedicated to the task after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.				
15.5 hours *30 minutes per inspection X 31 Inspections	15.5 hours *30 minutes per inspection X 31 Inspections	TBD	TBD				

<sup>\*</sup>Prior to this activity an outside party completed these inspections; after implementation of the activity LHA staff will complete these inspections. There will be no time savings for LHA staff but more efficient use of time to eliminate scheduling inspections with a third-party and faster turn-around housing tenants.

CE #3: Decrease in Error Rate of Task Execution							
Unit of Measure: Average Error Rate in Completing Inspections							
Baseline	Benchmark	Outcome					
Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.				
0	0	TBD	TBD				

#### **Authorizations**

Attachment C. Section D.5. The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. This authorization waives certain provisions of Section 8(0)(8) of the 1937 Act and 24 C.F.R. 982, Subpart I as necessary to implement the Agency's Annual MTW Plan. The authorization is needed because PHAs are required to conduct third party inspections under Section 8(0)(11) of the Act and 24 CFR 983.103(f)(1).

# Activity 19 – Tenant-Based Rental Assistance for Youth Aging Out of Foster Care

#### **Description**

The LHA proposes develop a tenant-based assistance program for youth (ages 18-24) aging out of Kentucky's foster care. The initiative would serve direct referrals from Kentucky's Cabinet for Health and Family Services.

According to the Kentucky Cabinet for Health & Family Service (CHFS) more than 6,800 children are currently in Kentucky's CHFS foster care. Youth 18 to 21 years old who extend their commitment with the Cabinet are eligible for formal life skills classes, mentor and youth leadership opportunities, tuition assistance and a tuition waiver. The National Alliance to Prevent Homelessness statistics report that between 11 and 37 percent of youth aging out of foster care experience homelessness after they transition and an additional 25 to 50 percent are unstably housed after transition.

The LHA will provide a maximum ten (10) tenant-based vouchers annually for youth aging out of foster care. LHA staff will establish a partnership with state and local CHFS to implement this initiative. The LHA would enter into a Memorandum of Understanding with the Kentucky CHFS to supply vouchers to their referrals. The aging out Foster Care youth must agree to extend their commitment with CHFS to continue receiving case management services. The LHA HCV staff will interview, screen and enroll families for the program. In addition the LHA HCV staff will provide the program orientation to families prior to move-in.

The voucher can be utilized the same as a regular tenant-based voucher with the participant paying the greater of 30-40% of monthly adjusted income or 10% of gross income or minimum rent toward rent and average utilities. The LHA will provide the tenant-based voucher only as long as the foster youth receives case management services from CHFS. Once the commitment between the foster youth and the CHFS ends the voucher will be terminated.

# **Meets Statutory Objective**

This activity will allow the Housing Authority to increase housing choice to low-income families.

# **Anticipated Impact of Activity on Statutory Objectives**

LHA anticipates that this activity will make it possible for LHA to make permanent housing available foster youth who have aged out of the state system.

# **Schedule for Achieving Objective**

Upon approval of the FY2017 Plan the LHA plans to work with the CHFS to negotiate a Memorandum of Understanding (MOU) to begin accepting referrals. LHA anticipates being able to provide this housing assistance by October 2016.

# **Standard HUD Metrics**

SS #1: Increase in Household Income							
Unit of Measure: Average Earned Income of Youth aging out of foster care households.							
Baseline	Baseline Benchmark Outcome Benchmark Achieved?						
0	\$8,528	TBD	TBD				

SS #3: Increase in Positive Outcomes in Employment Status								
Unit of Measurement – (1) Full-time Employment Status of youth aging out of foster care households.								
Baseline	Baseline Benchmark Outcome Benchmark Achieved?							
0 10 TBD TBD								

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)					
Unit of Measurement – Youth Aging Out of Foster Care Households receiving TANF.					
Baseline	Benchmark Outcome Benchmark Achieved?				
0	0 7 TBD <b>TBD</b>				

SS #5: Households Assisted by Services that Increase Self Sufficiency						
Unit of Measurement - Youth Aging Out of Foster Care Households receiving services aimed to increase self-sufficiency.						
Baseline Benchmark Outcome Benchmark Achieved?						
10 10 TBD TBD						

SS #6: Reducing Per Unit Subsidy Costs for Participating Households					
Unit of Measurement - Average amount of Section 8 and/or 9 subsidy per youth aging out of foster care households affected by this policy in dollars (decrease).					
Baseline	Benchmark Outcome Benchmark Achieved?				
0	\$7,404	TBD	TBD		

SS #7: Increase in Agency Rental Revenue				
Unit of Measurement - PHA rental revenue in dollars (increase).				
Baseline	Benchmark	Outcome	Benchmark Achieved?	
0	TBD	TBD	TBD	

SS #8: Households Transitioned to Self Sufficiency				
Unit of Measurement – Number of households transitioned to self sufficiency (increase).				
Baseline	Benchmark	ork Outcome Benchmark Achieved?		
0	3	TBD	TBD	

# **Authorizations**

Broader Uses of Funds Authority amendment. LHA will adhere to all requirements set forth in PIH Notice 2011-45.

# Activity 20 – Assign Project-Based Vouchers to LHA Owned/Controlled Units Without Bid Process

#### **Description**

The LHA proposes to select existing and new LHA owned/managed property for project-based voucher assistance without a competitive bid process. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project. The LHA has plans to project-base its own new construction projects in the coming year and this flexibility will be have a positive impact for the agency and the clients we serve.

# **Meets Statutory Objective**

The proposed activity will reduce costs and increase cost effectiveness and increase housing choices for needy families.

# **Anticipated Impact of Activity on Statutory Objectives**

The proposed MTW activity will reduce costs and increase cost effectiveness by reducing the administrative burden and direct costs (i.e. cost of publication of public notice in the newspaper) normally associated with developing and issuing an extensive Request for Proposals (RFP), reviewing and processing the applications submitted, and waiting for HUD's review and approval of the LHA-owned/controlled project.

The proposed activity will be critical in helping LHA create a stable and reliable financial outlook for these units that will provide timely maintenance and upgrades and preserve the affordability of these units for the residents.

The activity will also increase housing choice for low-income families by accelerating the unusually lengthy processing time when bringing LHA-owned/controlled project-based units under contract.

#### **Schedule for Achieving Objective**

The LHA plans to develop ten units for homeless families on an LHA owned lot during FY2017 using this flexibility.

# **Standard HUD Metrics**

CE 1: Agency Cost Savings					
Unit of Measure: Cost to se	lect existing and new LHA ow	ned/managed property for p	project-based voucher		
assistance without a compe	etitive bid process				
Baseline	Benchmark	Outcome	Benchmark Achieved		
Total Cost of task prior to implementation of the activity.	plementation of the after implementation of implementation of the meets or exceeds the				
\$3,320	\$530	TBD	TBD		

CE 2: Staff Time Savings						
	<u> </u>	owned/managed property for	or project-based voucher			
assistance without a compe	etitive bid process					
Baseline	Benchmark	Outcome	Benchmark Achieved			
Total Time to Complete the	Expected amount of staff	Actual staff time dedicated	Whether the outcome			
Task in Staff Time (decrease)	time dedicated to the task	to the task after	meets or exceeds the			
	after implementation of the implementation of the benchmark.					
activity (in hours). activity.						
40 hours per project	10 hours	TBD	TBD			

# **Authorizations**

Attachment C, Section D.7.a. Establishment of an Agency MTW Section 8 Project-Based Program, which waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983.

# Activity 21 – Triennial Certifications for HCV Homeownership Participants (Rent Reform)

#### **Description**

LHA staff recommends this activity to reduce the administrative burden of annual certifications for Homeownership households by conducting income reexaminations every three (3) years. Staff sees minimal changes in income for the 32 homeownership households in the Housing Choice Voucher program. The elimination of these annual certifications will allow for more time for HCV specialist to devote to other HCV programs.

#### **Meets Statutory Objective**

This activity will reduce costs and achieve greater cost effectiveness.

#### **Anticipated Impact of Activity on Statutory Objectives**

This initiative is intended to impact LHA's operations by reducing the number of annual reexaminations conducted by staff resulting in reduced costs and greater cost/administrative effectiveness. A related benefit exists for households, who will by virtue of this activity, reduce the number of times they will have to engage in the recertification process, thus increasing client/customer satisfaction. Thirty-two households will be subject to this policy once the implementation is complete.

#### **Schedule for Achieving Objective**

The LHA will implement this activity once the Plan is approved by notifying tenants 60 days prior to their next annual certification.

#### **Standard HUD Metrics**

CE 1: Agency Cost Savings						
Unit of Measure: Cost Per Ann	Unit of Measure: Cost Per Annual Certification					
Baseline	Benchmark	Outcome	Benchmark Achieved			
Total Cost of Task in Dollars	Total Cost of task prior to	Actual Cost of task after	Whether the outcome			
	implementation of the	implementation of the	meets or exceeds the			
<ul> <li>Cost Per Annual</li> </ul>	activity.	activity (in dollars).	benchmark.			
Certification = \$28.53 X 31						
Annual Certifications =	Year 1: <b>\$884.43</b>	Year 1: TBD	Year 1: TBD			
\$884.43	Year 2: <b>\$0</b>	Year 2: TBD	Year 2: TBD			
	Year 3 - <b>\$0</b>	Year 3: TBD	Year 3: TBD			
• 1 hour – Average time to						
complete Annual	Cost per annual	Actual Cost of Annual	Explanation to be provided.			
Certification	certification after implementation of the	Certification				
• Staff Hourly Costs - \$27.78	activity \$28.53					
Hard Costs Per	31 Annual Certifications					
Certification – .75¢ (mail,						
paper, copies, etc.)						

CE 2: Staff Time Savings				
Unit of Measure: Cost Per Ann	ual Certification			
Baseline	Benchmark	Outcome	Benchmark Achieved	
Total Time to Complete the	Total amount of staff time	Actual Cost of task after	Whether the outcome	
Task in Staff Time (decrease)	dedicated to the task prior	implementation of the	meets or exceeds the	
	to implementation of the	activity (in dollars).	benchmark.	
31 hours	activity (in hours).			
		Year 1: TBD	Year 1: TBD	
• 1 hour staff time to	Year 1: <b>31 hours</b>	Year 2: TBD	Year 2: TBD	
complete annual	Year 2: <b>0</b>	Year 3: TBD	Year 3: TBD	
certification	Year 3 - <b>0</b>			
		Actual amount of staff time	Explanation to be provided.	
• 31 Annual Certifications		dedicated to the task after		
		implementation of the		
		activity (in hours).		

CE 5: Increase Agency Rental Revenue					
Unit of Measure: Rental Rever	ue in dollars (increase).				
Baseline	Benchmark	Outcome	Benchmark Achieved		
Rental revenue prior to	Expected rental revenue	Expected rental revenue	Whether the outcome		
implementation of the activity (in dollars).	prior to implementation of the activity (in dollars).	after implementation of the activity (in dollars).	meets or exceeds the benchmark.		
\$154,860*	\$154,860	TBD	TBD		

<sup>\*</sup>HCV does not receive rent – the amount shown is HAP paid on behalf of the tenant.

#### **Authorizations**

# D. Authorizations Related to Section 8 Housing Choice Vouchers Only

- D. 1. c. The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(0)(5) of the 1937 Act and 24 C.F.R. 982.516 as necessary to implement the Agency's Annual MTW Plan;
- 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(0)(1), 8(0)(2), 8(0)(3), 8(0)(10) and 8(0)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan;

Cited authorization from Attachment C or D is needed to engage in this activity Non MTW agencies are required to conduct annual reexaminations for all households. The flexibility provided in Attachment C allows the agency to alter the reexamination period.

# **Impact Analysis**

The nature of this activity reduces the likelihood of the creation of any increased financial impact on households. However because this is a rent reform activity, an impact analysis will be conducted to identify and/or measure any disparate impact that it might cause to protected groups in terms of an added rent burden.

HCV Homeownership Households	Heads of Household	Average Total Annual Adjusted Income Baseline	Average Gross Annual Earned Income Baseline	Average Gross Rent Payment Baseline
Total Households	31	\$19,927	\$16,050	\$956
Gender				
Female	29	\$20,414	\$17,157	\$966
Male	2	\$12,865	\$0	\$817
Race (Multiple selections permitted)				
Black	24	\$20,351	\$17,795	\$963
White	7	\$18,476	\$10,069	\$932
American Indian / Native Alaskan	0	-	-	-
Asian / Pacific Islander	0	-	-	-
Native Hawaiian / Other Pacific Islander	0	-	-	-
Other	0	-	-	-
Ethnicity				
Non-Hispanic	31	\$19,927	\$16,050	\$498
Hispanic	0	0	\$0	\$0
Age of Head of Household				
18-31	1	\$57,580	\$63,340	\$1,019
32-46	16	\$22,782	\$21,348	\$1,020
47-61	10	\$15,259	\$8,240	\$895
62 and Over	4	\$10,764	\$2,688	\$838

#### **Impact Analysis**

	Heads of	Average Total Annual	Avg. Gross Annual	Average Crees
HCV Households	Household	Adjusted Income	Earned Income	Average Gross Rent Payment
		,		,
Total Households	1344	\$10,682	\$8,737	\$878
Gender				
Female	1171	\$11,076	\$9,218	\$910
Male	173	\$8,013	\$5,508	\$662
Race (Multiple selections permitted)				
Black	1056	\$11,110	\$9,312	\$888
White	286	\$9,106	\$6,676	\$841
American Indian/Native Alaskan	1	\$12,769	\$480	\$986
Asian/Pacific Islander	0			
Native Hawaiian/ Other Pacific Islander	1	\$6,624	\$0	\$1,328
Other	0			
Ethnicity				
Non-Hispanic	1319	\$10,660	\$8,697	\$877
Hispanic	25	\$11,811	\$10,860	\$926
_				
Age of Head of Household				
18 - 31	358	\$10,132	\$9,561	\$860
32 - 46	714	\$11,572	\$9,161	\$938
47 - 61	272	\$9,066	\$6,542	\$744

#### Hardship Case Criteria

Households affected by this activity will be subject to the LHA's Hardship Policy (Appendix A)

# **Description of Annual Reevaluation of Rent Reform Activity:**

The LHA will review annually the activity and revise as necessary to mitigate the negative impacts of unintended consequences. Dr. Amanda Sokan, LHA's MTW Evaluator recommends conducting a customer satisfaction survey prior to implementation of this activity and post implementation to gauge how HCV Homeownership households feel about the activity.

Increase in Client/Customer Satisfaction				
Unit of Measure: Client/customer satisfaction survey				
Pre- Activity Survey	Post-Activity Survey	Outcome		
TOD	TOD	TDD		
TBD (Baseline data to be gathered prior to	TBD  Derive from baseline	TBD		
implementation of the activity)	Derive nom baseline			

#### **Transition Plan**

The LHA will give all HCV Homeownership participants 60-day notice of their next annual certification once the FY2017 MTW Annual Plan has been approved.

SECTION IV – Approved MTW Activities: HUD Approval Previously Granted – IMPLEMENTED ACTIVITIES

# Activity 1 – Increase Minimum Rent to \$150 Across All Housing Programs

#### Plan Year Activity Approved and Implemented

Proposed FY 2012 – FY 2013 for Pimlico Apartments Implemented May 1, 2012 Activity Expanded FY2014 to all Public Housing Units and HCV Units Implemented April 1, 2014

#### **Description**

All non-elderly/non-disabled public housing and Housing Choice Voucher (HCV) tenants pay \$150 in minimum rent. The LHA increased the minimum rent to \$150 across all housing programs (Section 8 & 9) excluding elderly and/or disabled households and households participating in HCV special partner programs in April 2014. The initiative promotes self-sufficiency by encouraging heads-of-household to work, while raising much-needed revenue.

#### **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

#### Changes or Modifications Metrics, Baselines or Benchmarks During FY2017

The LHA does not anticipate any changes or modifications during the FY2017 Plan year to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

#### Significant Change or Modifications to the Activity Since Approval

# Activity 3 - Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households

Plan Year Activity Approved and Implemented

Activity Proposed, Approved, and Implemented – FY2012-FY2013 Plan For Connie Griffith Manor households
Activity Expansion Approved and Implemented – FY2014 Plan
Expanded to include HCV elderly and disabled households on a fixed income

#### **Description of Activity and Status Update**

This activity is ongoing. The Housing Authority implemented this activity for all 183 units at Connie Griffith Towers, an elderly high rise, during FY 2012 – FY 2013. Through this activity the LHA is recertifying households at Connie Griffith once every three years instead of annually. Between triennial re-certifications, whenever the federal government adjusts benefits paid through fixed-income programs like Social Security and SSI, the LHA reserves the right to adjust resident household incomes and rent payments accordingly.

The success of that initiative prompted staff to request authority to expand the activity to HCV elderly and disabled families on a fixed income. As the vast majority of elderly and disabled households in the HCV programs rely on fixed-income sources, there is little variation in household income on an annual basis. In reference to this activity, households on a fixed income are defined as any household with any amount of income from a fixed income source like Social Security, SSDI, or pension income.

Additionally, the LHA created a "local version" of HUD-Form 9886 that would be signed by the tenant at the triennial recertification. Households who experience a significant loss of income, an increase in allowable medical expenses, or a change in family composition may request an interim recertification at any time. Households whose income increases \$200 or more per month must request an interim recertification.

The LHA is waiting to hear if HUD adopts streamlined certification for households on a fixed incomes in Section 8 and 9 programs. If triennial certifications are adopted by HUD this activity will be discontinued.

#### **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2017.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017 The LHA does not anticipate any changes or modifications during the FY2017 Plan year to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

#### Significant Changes or Modifications to the Activity Since Approval

# Activity 5 – Streamlined HQS Inspection Policy for Housing Choice Voucher

Plan Year Activity Approved and Implemented Proposed and Approved FY2012 – FY2013 Plan Significantly Modified FY2014 Plan Implemented FY2015

#### **Description**

Until June 25, 2014, HUD regulations mandated that housing authorities inspect every HCV unit at least annually to ensure they meet Housing Quality Standards (HQS). Section 220 of the 2014 Appropriations Act now allows housing authorities to comply with the requirement to inspect assisted housing units in the HCV program by inspecting such units not less than biennially, rather than annually. While LHA intends to uphold HUD's high standards of decent, safe, and sanitary housing maintained in good repair for all HCV households, the Authority believes it can achieve this outcome more cost-effectively through a new *Star Rating System* for HCV property owners.

## **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications to this activity during FY2017.

## Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017

There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

#### Significant Changes or Modifications to the Activity Since Approval

# Activity 10 – HCV Tenant-Based Special Partners Programs

# Plan Year Activity Approved and Implemented

Activity Proposed, Approved, and Implemented in FY 2012 - FY 2013

#### **Description**

LHA partners with two social service agencies in the Lexington area to provide stable, tenant-based voucher housing to low-income families while they receive services provided by the partner agency. (LHA partners with an additional seven social service agencies that provide designated, fixed housing to low-income families; these partners are addressed in Activity 12 of this Plan.) These "special partner programs" serve some of Lexington's most vulnerable low-income populations, those who need wraparound services in order to stabilize their family situation and begin working to increase self-sufficiency. Targeted populations include the mentally ill, the homeless, those recovering from alcohol or drug addiction, and parents who have recently been released from jail.

Through the approval of its FY 2012 – FY 2013 MTW Annual Plan, the LHA received permission to require that participants relinquish their tenant-based voucher at the time they graduate from or otherwise leave the program offered by the special partner, so another family may benefit from the housing and programming offered by the special partner.

The approval of this activity has permitted the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance.

Households receive HCV tenant-based assistance through the following special partner programs.

HCV Special Partner	Description of Households Served	Families Selecting Private Market Units
Bluegrass Domestic Violence (BGDV)	Victims of domestic violence, dating violence, sexual assault, and stalking	25
Bluegrass Regional Mental Health - Mental Retardation (BGMHMR)  Persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services		22
Total Units		47

While LHA hopes the majority of these families will subsequently seek unsubsidized housing in the private market, these households will also be eligible to apply for public housing or another HCV voucher (including Family Self-Sufficiency vouchers) through the Authority's normal application procedures.

# **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017 There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

# Significant Changes or Modifications to the Activity Since Approval

The LHA will make a significant modification to this activity during FY2017 by removing special partner Greenhouse17 (formerly Bluegrass Domestic Violence) from this activity. This special partner program will be moved to activity 12 because they are constructing 25 fixed units. At the time the agency begins housing participants in the partner's units the LHA will submit a request to HUD for a technical amendment to remove Greenhouse17 from this activity. The Volunteers of America special partner who provides services to homeless families is no longer participating as a partner due to staff reductions. This program had received 25 tenant-based youchers.

# Activity 12 - Local, Non-Traditional Use of MTW Funds for Special Partners

#### Plan Year Activity Approved and Implemented

This activity was proposed and implemented in FY2014 and is ongoing.

## **Description**

HCV staff met with representatives of the seven (7) special partner programs prior to implementation and signed Memoranda of Understanding (MOUs) in December 2013, and the activity was implemented in January 2014. The Authority currently provides monthly rental subsidy of \$130,509 to seven (7) special partners who have agreed to house and provide wraparound social services to a minimum of 358 families with special needs.

During FY2017 the LHA may add two additional special partner programs to this activity:

#### Greenhouse17

This partner is currently included in Activity 10. Greenhouse17 will develop 25 fixed units in October 2016 and at that time this special partner program will receive rental subsidy of

\$154,535 annually. Greenhouse17 serves victims of domestic violence, dating violence, sexual assault, and stalking.

# 352 Wilgus Street

Through funding made possible by the Lexington-Fayette Urban County Government (LFUCG) Office of Homelessness Prevention and Intervention (OHPI) the LHA will provide one single-family unit at 325 Wilgus Street as permanent housing for homeless families with dependent children. The Community Action Council will provide case management services for families living at this property. Families must agree to participate in case management services to remain in the unit. The LFUCG will provide one year of rental subsidy and the LHA will pay the utilities for one qualified family. After the initial year of occupancy, the LHA proposes that the family occupying 325 Wilgus Street will be provided a tenant-based voucher by the LHA to continue to live in the property or move elsewhere. Therefore, after the initial year, the LHA proposes to include this property as a special partner program receiving a monthly rental subsidy of \$1,143 (\$13,716 annually).

With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and with Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.

Those agencies are as follows:

Special Partner Program	Description of Households Served	# of Vouchers Provide
Canaan House	Individuals who have been diagnosed with a mental illness	17
Greenhouse17	victims of domestic violence, dating violence, sexual assault, and stalking	25
Hope Center	Persons who have a substance abuse problem and are in need of voluntary or court-mandated treatment	144
New Beginnings Bluegrass, Inc.	Individuals who have been diagnosed with a mental illness	24
OASIS Rental Assistance Housing Program	Families in need of financial literacy, credit management, and homeownership resources	30
One Parent Scholar House	Single parents who are full-time students in a post-secondary educational institution	80
Serenity Place (Chrysalis House)	Parents with children: 1) who have recently been released from jail or are homeless and 2) who are substance abuse treatment program graduates	40
Urban League of Lexington- Fayette County	Elderly individuals	23
Total Special Partner Units		358

# **Explanation of any Non-Significant Changes or Modifications Since**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

# Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017

The baselines and benchmarks and/or metrics for this activity have been modified to add the Greenhouse17 partner agency. In addition, should the family occupying 325 Wilgus remain in the unit for one year and receive a tenant-based voucher metrics will be updated to include this property.

# **Attachment C or D Changes**

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

#### Significant Changes or Modifications to the Activity Since Approval

The LHA plans a significant change to this activity by adding an additional partner agency during FY2017.

Activity 13 – Local Self-Sufficiency Admissions and Occupancy Requirements
Activity

#### Plan Year Activity Approved and Implemented

Proposed and approved in FY 2014, this activity was implemented April 1, 2014 and is ongoing.

A technical amendment was submitted to HUD on January 14, 2016 to reduce the requirement for prior employment history from six months to three months for eligibility certification prior to signing a lease at a self-sufficiency site. This change will cause no adverse effect to the applicant and it is the Housing Authority's expectation that it will enhance the leasing process. The LHA's requirements for admissions and occupancy at self-sufficiency sites will be revised in the LHA's Admissions and Continued Occupancy Policy (ACOP).

#### **Description**

LHA created this activity with the aim of eliminating loopholes that a small but significant number of residents use to avoid work requirements at its public housing self-sufficiency units. Through this activity, the LHA has the authority to:

a) Impose a minimum earned income calculation for families residing at self-sufficiency units regardless of employment status – Minimum earned income for households members subject to the LHA's self-sufficiency work requirement will be calculated based on the following: Self-Sufficiency I units - 52 weeks x 37.5 hours x federal minimum wage; and, Self-Sufficiency II units - 52 weeks x 20 hours x federal minimum wage. The amount of assumed

annual income will be modified when the federal minimum wage is updated. This requirement is a condition of admissions and continued occupancy for all families who accept self-sufficiency units. Families whose head/co-head is a full-time student, are exempted.

- b) Modify the Definition of Work Activity used to determine whether or not a family is compliant with the self-sufficiency requirements. In order to ensure that the employment activities sought by residents will enable them to earn at least the minimum imputed earned income, the LHA received permission to create a local definition of "work activity," which limits compliant work activities to paid activities that are most likely to ensure families' incomes at least equal the minimum imputed earned income amount. Instead of using the requirements found at 42 USC 607(d), the LHA now defines "work activity" as follows:
  - a) Unsubsidized employment;
- c) Subsidized public sector employment;
- b) Subsidized private sector employment;
- d) Paid on-the-job training

# Authorization to Expand Current Self-Sufficiency Requirements to the Revitalized Centre **Meadows Units**

In addition, the LHA received approval to require Self-Sufficiency Level II Admissions and Continued Occupancy Rules at Centre Meadows (formerly Pimlico Apartments) postrevitalization. Centre Meadows is a 206-unit site converted from public housing to project-based voucher through the Rental Assistance Demonstration (RAD) Program. LHA staff is in the process of lease-up at Centre Meadows, as renovation was complete in March 2016. Returning families are exempt from these requirements for one year following re-occupancy.

# **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017 There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

#### Significant Changes or Modifications to the Activity Since Approval

# Activity 14 – Rent Reform: Elimination of Earned Income Disallowance

# Plan Year Activity Approved and Implemented

This activity was proposed in the FY2015 MTW Annual Plan and implemented during FY2015.

# **Description**

LHA staff proposes to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV households. Currently, federal regulations mandate the exclusion of earnings for public housing households in the following cases:

- The household income increases as a result of employment of a family member who was previously unemployed for one or more years.
- · Families whose income increases during the participation of a family member in any economic self-sufficiency or other job training program.
- Families who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program.

In the Housing Choice Voucher Program, the EID calculation only applies to disabled family members in the following cases (This activity does not apply to treatment group participants in the HCV Rent Reform Study.):

- Families whose income increases as a result of employment of a disabled family member who was previously unemployed (defined as working less than 10 hours a week at the established minimum wage) for one or more years.
- Families whose income increases during the participation of a disabled family member in any economic self-sufficiency or other job training program.
- Persons with disabilities who are or were, within 6 months, assisted under a State TANF or Welfare-to-Work program for at least \$500.

An individual family member is eligible for the EID for a maximum of 24 consecutive months with an overall lifetime limit of 48-months. During the first 12 months 100% of earned income is excluded, while 50% of earned income is excluded during the second 12 months.

Staff reports that the EID calculation is only available to a very small population because of the very specific requirements for the disallowance. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months is difficult to track because households don't always report when employment status starts and stops. In addition, many who do receive the benefit quit their jobs at the end of the two year exclusion to avoid an increase in the household rent. For those reasons and the administrative burden, the LHA proposes to eliminate the EID calculation.

Staff reports that the elimination of the EID has been extremely helpful in making more efficient use of time to complete other housing management tasks.

This activity will reduce costs and achieve greater cost effectiveness in federal expenditures.

#### **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

# Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017

There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

# Significant Changes or Modifications to the Activity Since Approval

# Activity 16 – HCV Rent Reform Study

#### Plan Year Activity Approved and Implemented

This activity was approved and implemented in April 2015. Random assignment for the study and control group was done in March 2015.

#### **Description**

Lexington Housing Authority (LHA) has been selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally. The centerpiece of the new policy is the substitution of triennial recertification of households' incomes for annual recertification. During the three-year period until a household's next recertification date, any increase in earnings it achieves will not cause the amount of rent and utilities it pays to go up.

The majority of Study participants were enrolled by March 2016. A total of 1,024 HCV participants have been enrolled in the Study (509 Treatment/Study Group and 515 Control Group)

## **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

#### Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017

There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

# Significant Changes or Modifications to the Activity Since Approval

# Activity 17 – Limit Interim Re-Examinations for Public Housing Households

## Plan Year Activity Approved and Implemented

This activity was proposed in the FY2016 MTW Annual Plan and implemented during FY2016.

#### **Description**

By limiting interim re-examinations, this initiative will reduce the administrative burden involved in processing annual and interim re-examinations and reduce the rate of errors in calculating adjusted income and rent. The staff time saved through this initiative will allow for better efficiency in processing annual and interim re-examinations.

# **Meets Statutory Objective**

Interim reductions in the rent portion will be made, but limited to reduce administrative costs to the LHA and to provide incentives to employed families to remain employed.

For households who are not elderly or disabled, interim adjustments will be limited as follows:

- Households may only request an interim reduction once between regularly scheduled reexamination periods. However, see the Hardship Policy below for exceptions to this limitation;
- Interim decreases will only be processed for loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits.
- No reduction based upon loss of job will be processed until the LHA receives documentation of eligibility or ineligibility for unemployment benefits;
- Decreases in public assistance income that are the result of a finding of fraud or a failure to comply with work/school requirements will not be processed.
- In calculating the reduction, all household income, including previously unreported income, will be counted;
- The household's loss of income must be expected to last longer than four (4) months;
- All interim rent reductions will be temporary.
- An exception to this policy allows for an interim at any time for compliance in 50058 reporting and is limited to the following: the addition of a household member, the death or removal of a household member.

After receiving a rent decrease, a family becomes obligated to report any new income within ten business days. A follow-up interim will be conducted to include new income, and the resulting increase will be implemented after providing the family with 30-day notice of the increase.

Activity 17 Hardship Policy can be seen at Appendix B.

# **Non-Significant Changes or Modifications During FY2017**

The LHA does not anticipate any non-significant changes or modifications during the FY2017 Plan year.

# Changes or Modifications to the Metrics, Baselines or Benchmarks During FY2017

There have been no changes to benchmarks and/or metrics for this activity.

#### Attachment C or D Authorization(s) Changes

There have been no changes in Attachment C or D authorizations since this activity was proposed and approved.

# Significant Changes or Modifications to the Activity Since Approval

# NOT YET IMPLEMENTED ACTIVITIES

#### Activity 7 – Public Housing Acquisition Without Prior HUD Approval

## Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved - FY 2012-2013 Plan

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. For example, sellers are not always willing to provide the agency with an option of long enough duration to cover the typical amount of time LHA requires to obtain HUD approval for site acquisition.

This relief will apply only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.

All acquired properties will meet HUD's site selection requirements. Approval from the local HUD office will be sought when a pending real estate acquisition deviates from the selection requirements. Copies of all required forms and appraisals will be maintained at the Authority's main office. After acquisition, all required documentation will also be provided to the HUD field office so HUD officials can ensure that site selection requirements were met and establish records for these new public housing properties in the agency's data systems.

#### Provide an update on the plan for implementation of the activity;

The LHA did not acquire any public housing properties during where it necessary to implement this activity.

#### Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2017 should the Authority decide to acquire public housing units or land for the development of public housing.

## Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

## Activity 8 – Conversion of Appian Hills Public Housing to Project-Based Vouchers

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved - FY 2012-2013 Plan

Activity Significantly Modified in FY2014

While Appian Hills received \$500,000 in ARRA-funded energy improvements (cool roofing materials, new doors, and high-efficiency furnaces and water heaters), this 1970's turnkey development still needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site's 27 four-bedroom homes.

LHA continues to work diligently to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority. Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.

#### Provide an update on the plan for implementation of the activity;

Should HUD issue a NOFA during FY 2017 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.

#### Provide a timeline for implementation;

The LHA does not know when funding resources will be available for implementation of this activity. The LHA will actively seek funding opportunities during FY2017.

### Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

## Activity 9 – Development of Project-Based Voucher Units at 800 Edmond Street

## Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed and Approved – LHA's FY2012-FY2013

LHA plans to develop between five and eight projected-based 3-bedroom townhomes on a vacant lot owned by the agency on Edmond Street. The property is adjacent to an existing 3-unit public housing site and close to the Authority's Pine Valley Management Office.

The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed on project-based voucher developments. Current project-based voucher rules limit percentage of project-based units to 25% of the units in the development. The LHA plans to project-base 100% of the units at this site.

#### Provide an update on the plan for implementation of the activity;

The activity has been not been implemented so that available financial resources could be focused on the rehabilitation of Centre Meadows. The LHA still plans to implement this activity once financial resources become available.

#### Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2017 should the Authority decide to develop the Edmond Street property.

### Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

Activity 11 – Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers

Describe any approved activities that were proposed in the Plan, approved by HUD, but have not yet been implemented, and discuss why these activities were not implemented; specify the Plan Year in which the activity was first approved;

Activity Proposed in FY2012-2013 Plan Approved with FY2012 – FY2013 Plan Approval Revised in FY2014 Plan Revision Approved with FY2014 Plan Approval

Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Tower (which is attached to an LHA-owned public housing site, Connie Griffith Manor; serves low-income, elderly households; and is managed, but not owned, by the LHA) require significant emergency capital repairs. MTW funds would only be used if the tax credit investor can demonstrate to the Authority's satisfaction that it does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Place no more than \$300,000 in emergency funds in total.

When this activity was proposed the LHA did not have a confirmed funding source for sorely needed capital improvements at Ballard. After the activity was approved, the site's tax credit investors informed the LHA that they would indeed have sufficient funds to complete the needed work. Having spent a significant portion of their reserves to fund these improvements the Housing Authority was concerned about their ability to cover any additional emergency capital repairs, which prompted creation of this activity.

#### Provide an update on the plan for implementation of the activity;

This activity has not yet been implemented, but will be implemented if there is an emergency capital expense necessitating the use of these funds at Ballard Place. LHA is pursuing several options to provide much-needed supportive services to residents of both Connie Griffith Manor and Ballard Place, including onsite case management and health services. To this end, the LHA has hired two service coordinator positions at the towers. The Authority will continue to examine possible avenues to utilize MTW funding flexibility to enhance the provision of services to residents of both towers.

#### Provide a timeline for implementation;

The LHA will develop a timeline for this activity during FY 2017 should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.

## Provide an explanation of any non-significant changes or modifications to the activity since it was approved;

#### **CLOSED OUT ACTIVITIES**

15 – Limit HCV Landlord Rent Increases to the Least of 2%, HUD Fair Market Rent (FMR), or the Comparable Rent

#### Plan Year Activity Approved and Implemented

This activity was proposed in the FY2015 MTW Annual Plan and implemented during FY2015. The LHA proposed to limit annual contract rent increases for participating landlords to the least of a 2% increase in current contract rent, HUD's FMR or the comparable rent.

This activity is being closed out because LHA staff has found that this activity places a burden on the landlord and is negatively affecting landlords and hindering new landlords from making their units available to the HCV program.

#### **SECTION V: SOURCES & USES OF FUNDS**

	Uses of MTW Funds	
A. MTW Plan: Sources a	and Uses of MTW Funds	
Estimated Sources of MTM	Funding for the Fiscal Year	
Estimated Sources of Will W	runding for the ristal real	
PHAs shall provide the estimated sources and amo	ounts of MTW funding by FDS lin	e item.
	rces	1
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	4095958
70600	HUD PHA Operating Grants	23759944
70610	Capital Grants Total Foo Boyonus	300000
70700 (70710+70720+70730+70740+70750) 71100+72000	Total Fee Revenue Interest Income	1632643 9676
71100+72000	Gain or Loss on Sale of Capital	3070
71600	Assets	\$0
71200+71300+71310+71400+71500	Other Income	81329
70000	Total Revenue	29879550
	unts of MTW spending by FDS li	ne item.
PHAs shall provide the estimated uses and amou		ne item.
PHAs shall provide the estimated uses and amou	unts of MTW spending by FDS li	ne item.  Dollar Amount
PHAs shall provide the estimated uses and amou	unts of MTW spending by FDS li	
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PHAs shall provide the estimated uses and amount Uses  FDS Line Item  91000 (91100+91200+91400+91500+91600+91700+91800+91900) 91300+91310+92000 91810 92500 (92100+92200+92300+92400) 93000 (93100+93600+93200+93300+93400+93800) 93500+93700 94000 (94100+94200+94300+94500)	FDS Line Item Name Total Operating - Administrative Management Fee Expense Allocated Overhead Total Tenant Services Total Utilities Labor Total Ordinary Maintenance	Dollar Amount 4030784 1632643 0 0 1806938 0 3118380
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The difference between the total revenue and total expense in the Estimated Sources of MTW Funding for the Fiscal year section is due to depreciation and adjustment for tax credit (non-LHA activity).

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#### **SECTION VI: ADMINISTRATIVE**

- A. Resolution Signed by the Board of Commissioners and Certifications of Compliance
- B. The beginning and end dates of when the Plan was made available for public review, public hearing sign-in sheet and # of attendees, etc.
- C. Evaluation

#### A. LHA Board Resolution

#### RESOLUTION APPROVING THE LHA'S FY 2017 MOVING TO WORK ANNUAL PLAN

WHEREAS, the Lexington-Fayette Urban County Housing Authority (LHA) executed a Moving to Work (MTW) Agreement on November 10, 2011, which provides LHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the MTW Agreement, an annual plan must be developed and submitted to HUD to formally enable the Authority to fully use the policy and budget flexibility provided to participants in the MTW Program; and

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) approved the LHA's FY 2012 MTW Annual Plan on December 29, 2011; and

WHEREAS, the LHA's FY 2016 MTW Annual Plan was submitted to HUD on June 1, 2015 and approved by HUD on October 15, 2015, effective through June 30, 2016; and

WHEREAS, LHA has proposed four new activities in the FY 2017 MTW Annual Plan that will serve to reduce costs and achieve greater cost effectiveness in federal expenditures; encourage self-sufficiency for working families; or, increase housing choice for low-income families; and

WHEREAS, the LHA has proposed to modify MTW Activities 10 and 12 that include Housing Choice Voucher Special Partner Program Greenhouse17 (formerly Bluegrass Domestic Violence) in the FY2017 MTW Annual Plan to allow this special partner program to receive monthly block grant funding for 25 vouchers attached to fixed units; and

WHEREAS, the LHA has proposed to eliminate Activity 15 proposed in the FY2015 MTW Annual Plan to limit annual contract rent increases for participating landlords to the least of a 2% increase in current contract rent, HUD's FMR or the comparable rent; and

WHEREAS, a Board Resolution approving the proposed FY 2017 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from March 15, 2016 through April 15, 2016 for the public to comment on the Plan, and has conducted a Public Hearing on March 29, 2016 to discuss the proposed Annual Plan before its submission to HUD,

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2017 MTW Annual Plan is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.

Daryl Smith

Chairperson, Board of Commissioners

April 18, 2016

Date

#### **Certification of Compliance**

OMB Control Number: 2577-0216 Expiration Date: 5/31/2016

#### 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 7/1/1,6ereinafter 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:

- 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.
- 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.
- 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.
- 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.
- 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.
- The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- 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.
- 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.
- 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.

OMB Control Number: 2577-0216 Expiration Date: 5/31/2016

- 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.
- The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR
   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.
- With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section
   of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- 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.

Lexington-H	ayette Urban (	County	-KY004	
PHA Name	Housing Auth		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)

Daryl Smith

Chairman, Board of Commissioners
Title

7/25/2016 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 Comment Documents**

The FY2017 MTW Annual Plan was made available for public comment March 15 – April 15, 2016. The public hearing was held March 29, 2016. A public hearing announcement was advertised in the local newspaper and posted at all LHA offices as follows:

Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding: 1) Proposed FY 2017 Moving to Work (MTW) Annual Plan; 2) Revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP); and 3) Revisions to the Housing Choice Voucher (Section 8) Administrative Plan, and; 4) Revision to the Family Self-Sufficiency Action Plan for Public Housing and Housing Choice Voucher programs and; Proposed FY2016 Capital Fund Work Activities.

There will be a public hearing on **Tuesday, March 29, 2016 at 5:30 PM** at LHA's Central Office, located at 300 W. New Circle Rd, Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2017 MTW Annual Plan that includes four new activities; proposed modifications to the Public Housing ACOP; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan; and proposed revisions to the Public Housing Maintenance Fee Schedule, and; the proposed FY2016 Capital Fund Work Activities.

LHA welcomes public comment regarding these changes from March 15 – April 15, 2016. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

The following is a copy of the ad from the <u>Lexington Herald-Leader</u> newspaper Tuesday, March 15, 2016



#### **Public Hearing Sign-In Sheet**

#### LHA Public Hearing Sign-In Sheet 5:30 p.m. – Tuesday, March 29, 2016

Name	Address	Email Address/Phone #
Andiomo M. whier	LHA	
Tom Smith	1.H.P.	
Cathy Hall	LHA	
Kathy Self	GRIFFITH BallARDTUNE	95
Dissie Edward	TOWN Plaza A3	
Thomas Lonel	650 Sower Ply#B1	
Bill Gam	LHA	
Pm Wholese		
Julian Willow	LHB	
SAZZY HOLIE	_ CHA	
Michele Clee	_ LHA	
Alderteaset	_CHA	
Sian Cooper		
atertia	LHA	·
		· <del></del>

#### C. Evaluation

Since entering the Demonstration, the LHA has partnered with Kentucky State University to evaluate our rent reform MTW activities. During FY2015 KSU underwent a major overhaul of administrative staff that included a new president. Many of the core staff who were present when the LHA entered the agreement with KSU are no longer with the university. The LHA elected to secure a new evaluator, but one who worked with KSU at the start of our partnership with KSU, Dr. Amanda Sokan. Dr. Sokan is an independent consultant, who is currently an assistant professor with the University of Kentucky in the Health Management and Policy Department. Dr. Sokan served as lead evaluator of the LHA's MTW program when the LHA entered the Demonstration in 2011. At that time she was employed by KSU but has since left the university. Dr. Sokan will lead oversight of the MTW program evaluation process, with an overall mandate to assess, monitor and report on the effects of the LHA's MTW initiatives.

The central goal of the rent reform evaluation is to measure the overall effectiveness of the rent reform in accomplishing HUD's stated goals of: increasing the number and quality of affordable housing choices throughout the Lexington-Fayette community, increasing the number of families moving toward self-sufficiency, strengthening the number of community partnerships benefitting residents with special needs, and reducing administrative costs while limiting administrative burdens placed on staff and residents. In addition, the evaluation will consider potential disparate impacts on protected classes of residents as determined by sex, race, ethnicity, age and disability.

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

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 08/31/2011

Authority Capital I			Type and Number Fund Program Grant N Yes/ No); ment Housing Factor (		112	Federal	Federal FFY of Grant: 07/2012			
Development Number Name/PHA-Wide Activities	General Description of Major Categories	Work	/ork Development Account No.	Quantity	Total Estin	nated Cost	Total Actual Cost		Status of Work	
					Original	Revised <sup>1</sup>	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>		
PHA – Wide	Operations		1406		257,719	257,719	257,719	257,719		
Management Improvements	Security-On-Site		1408		182,642	182,642	182,642	182,642		
Administration	Management Fees		1410		128,860	128,860	128,860	128,860		
PHA-Wide	Fees & Costx		1430			461,114	461,114	347,523.47		
PHA – Wide	Dwelling Structures		1460		719,379	24,414	24,414	24,414		
PHA-Wide	Nondwelling Equipment		1475			233,851	233,851	233,851		

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
<sup>2</sup> To be completed for the Performance and Evaluation Report.

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

PHA Name: Lexington-Fayett	ie Orban County Hot	ising Authority			Federal FFY of Grant: 07/2012
Development Number Name/PHA-Wide Activities		d Obligated Ending Date)		ls Expended Ending Date)	Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406 LHA Wide Operation	03/2014	03/2014	03/2016	03/2014	
1408 Mgmt, Improvements	03/2014	06/2013	03/2016	04/2014	
1410 LHA Wide Administration	03/2014	06/2012	03/2016	06/2012	
1430 PHA – Wide – Fees & Costs	03/2014	02/2016	03/2016		
1460 PHA Wide Dwelling Structures	03/2014	02/2016	03/2016	02/2016	
1475 PHA-Wide Nondwelling Equipment	03/2014	02/2016	03/2016	03/2015	

<sup>&</sup>lt;sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>&</sup>lt;sup>4</sup> RHF funds shall be included here.

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

	Summary					
PHA Na County	me: Lexington-Fayette Urban Housing Authority	Grant Type and Number Capital Fund Program Grant No: KY3 Replacement Housing Factor Grant No Date of CFFP:	6P00450113			FFY of Grant: 2013 FFY of Grant Approval:
⊠ Perf		Reserve for Disasters/Emergencies for Period Ending: 02/29/2016	[	Revised Annual Stater Final Performance and	nent (revision no: )	
Line	Summary by Development		Total Est	imated Cost		Total Actual Cost 1
			Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				12.300.000.02	
2	1406 Operations (may not ex-	10.00 Med 10.00 Million (10.00 Mill)	249,891		249,891	249,891
3	1408 Management Improvem		103,000		103,000	167,348.64
4	1410 Administration (may no	t exceed 10% of line 21)	124,945		124,945	124,946
5	1411 Audit					1,000
6	1415 Liquidated Damages					
7	1430 Fees and Costs					
8	1440 Site Acquisition					
9	1450 Site Improvement		162,445		162,445	113,829.93
10	1460 Dwelling Structures		609,174		609,174	407,457.69
11	1465.1 Dwelling Equipment-	-Nonexpendable			007,177	107,137.05
12	1470 Non-dwelling Structure					
13	1475 Non-dwelling Equipme	nt				
14	1485 Demolition					
15	1492 Moving to Work Demo	nstration				
16	1495.1 Relocation Costs					
17	1499 Development Activities	4				

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

Part I:	Summary				Expires 08/31/2011
PHA Nan Lexingto Urban C	me: on-Fayette Grant Type and Number			of Grant: 2013 of Grant Approval:	
Per	Grant  ginal Annual Statement  Greerve for Disasters/Eme formance and Evaluation Report for Period Ending:	rgencies		Annual Statement (revision no:	)
Line	Summary by Development Account	Total Estima			ital 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)	1,249,455		1,249,455	1,063,473,26
21	Amount of line 20 Related to LBP Activities	1,217,133		1,247,433	1,003,473.20
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				
Signatu	ure of Executive Director	Date Signature	of Public Housing	g Director	Date

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>&</sup>lt;sup>4</sup> RHF funds shall be included here.

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report, <sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement, <sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Part II: Supporting Page		T = -								
PHA Name: Lexington-Fa	yette Urban County Housing Authority	Capital CFFP (	Type and Number Fund Program Grant N Yes/ No): ment Housing Factor (		113	Federal	Federal FFY of Grant: 2013			
Development Number Name/PHA-Wide Activities	General Description of Major Categories	Work	Development Account No.	Quantity	Total Estim	ated Cost	Total Actual Cost		Status of Work	
					Original	Revised 1	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>		
PHA-Wide	Operations		1406		249,891					
PHA-Wide	Management Improvements		1408							
	Software Upgrade				103,000					
	Total Management Improvement	ents			103,000					
PHA-Wide	Administration		1410							
	CF Program Fee		1.1.2		124,945		-		+	
	Total Administration		1410		124,945					
KY004000001					211,278					
Bainbrdge-PineVly- Const										
Allante Brook	Door replacement		1460	32 units	34,208					
	Sub-Total				34,208					
Appian Hills	Parking lot repavement		1450	44 units	120,960					
	Sub-Total				120,960					
Camelot	Door replacement		1460	36 units	36,360					
	Sub-Total				36,360					
Trent	Door & window replacement		1460	9 units	19,750					
	Sub-Total				19,750					
	Total Project KY004000001				211,278					

Part II: Supporting Page									
PHA Name: Lexington-Fa	Capital F CFFP (Y	ype and Number fund Program Grant N es/ No): nent Housing Factor (		113	Federal	Federal FFY of Grant: 2013			
Development Number Name/PHA-Wide Activities	General Description of Major Categories	Work Develo	Development Account No.	Quantity	Total Estim	ated Cost	Total Actual	Cost	Status of Work
					Original	Revised 1	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>	
KY004000003					171,135		Obligated	Expended	
Unnamed					171,133			-	
Atiya	Roof replacement		1460	18 units	124,000			_	
	Sub-Total		1.100	Tourits	124,000			-	
Constitution	Parking lot light repair		1450	17 units	10,000				
	Sub-Total				10,000				
Scattered	Roof replacement		1460	1 unit	8,000				
	Sub-Total				8,000				
Old Wilson	Door and window replacement		1460	10 units	19,135				
	Sub-Total			To unito	19,135	-			
Catera Trace	Door replacement		1460	23 units	10,000				
	Sub-Total		1.00	ao anto	10,000				
	Total Project KY004000003				171,135				
KY004000004					318,749				
Connie Griffith	Window repair & brick sealing		1460	183 units	268,749				
	Energy management system repla	acement	1460	183 units	50,000				
	Sub-Total				318,749				
	Total Project KY004000004				318,739				

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
<sup>2</sup> To be completed for the Performance and Evaluation Report.

KY004000006				10.520	
Homeownership	Paint exterior trim	1460		10,530	
riomeownership		1460	17 units	10,530	
	Sub-Total			10,530	
	Total Project KY004000006			10,530	
KY004000008					
Sugar Mill	Paint exterior siding, rails, and doors	1460	16. 5	12,442	
ougai wiiii	Sub-Total	1460	46 units	12,442	
	Sub-10tal			12,442	
	Total Project KY004000008			12,442	
KY004000010				37,918	
Bluegrass Apartments	Restrip & seal parking lot	1450	32 units	5,918	
(The Shropshire)	Mold remediation	1460	32 units	8,000	
	Dumpster & dumpster enclosure replacement	1450	32 units	16,000	
	Repair structural damage	1460	4 units	8,000	
	Total Project KY004000010			37,918	
KY004000011				9,567	
Bluegrass Phase II	Dumpster & dumpster enclosure replacement	1450	24 units	6,567	
	Restrip & seal parking lot	1450	24 units	3,000	
	Total Project KY004000011			9,567	

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
<sup>2</sup> To be completed for the Performance and Evaluation Report.

PHA Name: Lexington-Fayette	Urban County Housing A	Authority			Federal FFY of Grant: 2013
Development Number Name/PHA-Wide Activities		d Obligated Ending Date)		is Expended Ending Date)	Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406 PHA-Wide	03/2015		03/2017		
1408 Mgmt. Improvements	03/2015		03/2017		
1410 LHA Wide Administration	03/2015		03/2017		
1450 Site Improvements	03/2015		03/2017		
1460 Dwelling Structures	03/2015		03/2017		

<sup>&</sup>lt;sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226

	Summary				•	Expires 8/31/201
	me: Lexington-Fayette Urban Housing Authority	Grant Type and Number Capital Fund Program Grant No: KY: Replacement Housing Factor Grant No Date of CFFP:	36P00450114 Jo:			FFY of Grant: 2014 FFY of Grant Approval:
⊠ Perf	ginal Annual Statement formance and Evaluation Report	Reserve for Disasters/Emergencies for Period Ending: 02/29/2016		Revised Annual States Final Performance and	nent (revision no: ) I Evaluation Report	-
Line	Summary by Development A	Account	Total Es	imated Cost		Fotal Actual Cost 1
1	Total non-CFP Funds		Original	Revised <sup>2</sup>	Obligated	Expended
2	1406 Operations (may not exc	eed 20% of line 21) 3	271,695			
3	1408 Management Improveme	ents	244,525		164,153	127,123.62
4	1410 Administration (may not	exceed 10% of line 21)	135,847		135,847	135,847.00
5	1411 Audit		122,011		133,017	155,647.00
6	1415 Liquidated Damages					
7	1430 Fees and Costs		30,000			
8	1440 Site Acquisition		50,000			
9	1450 Site Improvement		194,290			
10	1460 Dwelling Structures		482,120			
11	1465.1 Dwelling Equipment—	-Nonexpendable	102,120			
12	1470 Non-dwelling Structures	S				
13	1475 Non-dwelling Equipmen	t				
14	1485 Demolition					
15	1492 Moving to Work Demon	stration				
16	1495.1 Relocation Costs					
17	1499 Development Activities					

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

Part I: S	Summary				Expires 08/31/		
Lexington Urban Co	n-Fayette Grant Type and Number			FFY of Grant 2014 FFY of Grant Approval:			
	Frant    Reserve for Disasters/Emergencies   Transport   Reserve for Disasters/Emergencies   Reserve for Disasters/Emergencies			d Annual Statement (revision no:	)		
Line	Summary by Development Account	Total Estimat		erformance and Evaluation Repo			
		Original	Revised 2	Obligated	etal Actual Cost   Expended		
18a	1501 Collateralization or Debt Service paid by the PHA	(USCOMEDIA)	535,1000	Obligated	Expended		
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)	1,358,477		200,000	262.080.62		
21	Amount of line 20 Related to LBP Activities	1,336,477		300,000	262,970.62		
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						
Sionatu	re of Executive Director Date	Signature	of Public Housin	ng Divertou	Date		

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>&</sup>lt;sup>4</sup> RHF funds shall be included here.

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>&</sup>lt;sup>4</sup> RHF funds shall be included here.

C			Grant Type and Number Capital Fund Program Grant No: KY36P00450114  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 Estim	ated Cost	Total Actual Cost		Status of Work	
					Original	Revised 1	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>		
PHA-Wide	Management Improvements		1408	+	-					
	Software Upgrade		1408	+	135,847		135,847	111,238.62		
	Total Management Improveme	ents			135,847		133,047	111,230.02		
			*							
PHA-Wide	Administration		1410							
	CF Program Fee				135,847		135,847	135,847		
	Total Administration		1410		135,847					
PHA-Wide	Fees and Costs		1430							
	A & E Fees		1100		30,000					
	Total Fees and Costs		1430		30,000					
								,		

KY004000001					
Allante Brook	Tree trimming	1450	32 units	6757	
	Sub-Total			6757	
Appian Hills	Fence removal & replacement	1450	44 units	24,000	
	Retaining wall & landscape replacement	1450	44 units	60,000	
	Sub-Total			84,000	
Circle at Bainbridge	Tree trimming	1450	48 units	6758	
	Sub-Total			6758	
Camelot	Tree trimming	1450	36 units	6758	
	Sub-Total			6758	
Scattered Single- Family Housing	Roof & gutter replacement	1460	5 units	30,800	
	Siding & soffit replacement	1460	2 units	4320	
	Door & window replacement	1460	6 units	24,960	
	Sub-Total			60,080	
	Total Project KY004000001			164,353	

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
<sup>2</sup> To be completed for the Performance and Evaluation Report.

Part II: Supporting Page	5					19			
PHA Name: Lexington-Fa	yette Urban County Housing Authority	Capital CFFP (	Type and Number Fund Program Grant N Yes/ No): ement Housing Factor O		114	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 <sup>2</sup>	Funds Expended <sup>2</sup>	
KY004000002									
Heartsbrook	Replace storm doors		1460	34 units	39,440				
	Vinyl wrap exterior doors		1460	34 units	12,240				
	Sub-Total				51,680				

D D I						
Rogers Road	Back porch railing repair/replacement	1460	10 units	16,600		
	Sub-Total			16,600		
Rosemary	Replace storm doors	1460	26 1	20.170		
Roselliary		1460	26 units	30,160		
	Vinyl wrap exterior doors	1460	26 units	9360		
	Sub-Total			39,520		
_	Total Project KY004000002			107,800		
KY004000004						
Connie Griffith	Security Camera Upgrade	1408	183 units	108,678	29.206	
Comme Official	Sub-Total	1400	165 units		28,306	
	Sub-10tal			108,678		
	Total Project KY004000004			108,678		
KY004000007						
12th Street	Door replacement: bldg. exterior & apartment entrance	1460	40 units	50,400		
	Fence repair & replacement	1450	40 units	15,822		
	Sub-Total	11.0550		66,222		
	Total Project KY004000007			66,222		
KY004000009						
Russell Cave	Roof & gutter repair over doors	1460	26 units	43,160		
	Trim trees	1450	26 units	15,000		
	Fence repair/replacement	1450	26 units	10,000		
	Sub-Total			68,160		
	Total Project KY004000009			68,160		
KY004000003						
Atiya Place	Bathroom-cabinet & vanity top replacement	1460	18 units	5380		
	Kitchen-cabinet & counter top replacement	1460	18 units	5380		
	Roof & gutter replacement	1460	18 units	72,880		
	Dead trees removal	1450	18 units	2000		
	Perimeter fencing replacement	1450	18 units	8105		

	Sub-Total			93,745	
Catera Trace	Retention Basin Gates-gate, poles & railing repair/replacement	1450	23 units	900	
	Unit fencing-gate, poles, & rail replacement	1450	23 units	900	
	Privacy fence repair/replacement	1450	23 units	1200	
	Sub-Total			3000	
Scattered Single- family housing	Roof & gutter replacement	1460	13 units	57,080	
	Doors & windows replacement	1460	8 units	54,980	
	Bathroom-cabinet & vanity top replacement	1460	13 units	9580	
	Kitchen-cabinet & counter top replacement	1460	13 units	9580	
	Tree & shrubbery replacement	1450	8 units	6300	
	Sub-Total Sub-Total		90000000	137,520	
	Total Project KY004000003		-	234,265	
	Total Project Revolution			234,203	
					- V
KY004000010					
Bluegrass Apartments (The Shropshire)	Perimeter Fencing Replacement	1450	32 units	8105	
(The Shropshire)	Total Project KY004000010			8105	
KY004000015					
Bridlewood Apartments	Perimeter Fencing Replacement	1450	88 units	8105	
	Paver repair & restriping	1450	88 units	11,225	
	Dumpster pad repair	1450	88 units	3775	
	Total Project KY004000015			23,105	
KY004000033					
Grand Oaks	Perimeter Fencing Replacement	1450	88 units	800	
	Large Tree removal	1450	88 units	3600	
	Total Project KY004000033		-	4400	

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 08/31/2011

PHA Name: Lexington-Fayette U	Jrban County Housing	Authority			Federal FFY of Grant: 2014
Development Number Name/PHA-Wide Activities		d Obligated Ending Date)	All Func (Quarter	ls Expended Ending Date)	Reasons for Revised Target Dates <sup>1</sup>
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
1406 LHA Wide - Operations					
1408 Mgmt Improvements					
1410 Administration		06/2015		06/2015	
1430 Fees & Costs					
1450 Site Improvements					
1460 Dwelling Structures					
		_			

<sup>&</sup>lt;sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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

	Summary					Expires 06/			
PHA Na	HA Name: Lexington-Fayette Urban County Housing Authority  Grant Type and Number Capital Fund Program Grant No: KY36P00450115 Replacement Housing Factor Grant No: Date of CFFP:								
Type of ☐ Orig  ☑ Perf	inal Annual Statement	Reserve for Disasters/Emergencies for Period Ending:02/2*9/2016		Revised Annual States	nent (revision no: )				
Line	Summary by Development		Total Es	timated Cost		Total Actual Cost 1			
1	Total non-CFP Funds		Original	Revised <sup>2</sup>	Obligated	Expended			
2	120000 10000000000000000000000000000000								
2	1406 Operations (may not ex-								
3	1408 Management Improvem	ents							
4	1410 Administration (may no	t 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 Equipmen	nt							
14	1485 Demolition								
15	1492 Moving to Work Demoi	nstration	1,070,421		45,000	23,898.82			
16	1495.1 Relocation Costs				.5,000	23,070.02			
17	1499 Development Activities	4							

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>&</sup>lt;sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>To be completed for the Performance and Evaluation Report.
To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
PHAs with under 250 units in management may use 100% of CFP Grants for operations.
RHF funds shall be included here.</sup> 

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 06/30/2017

	Summary		181500	West and the second sec		
Urban C	on-Fayette Grant Type and Number		FFY of Grant: 2015 FFY of Grant Approval:			
=	Grant  ginal Annual Statement			d Annual Statement (revision no:	)	
ine	Summary by Development Account	Total Estimate		Performance and Evaluation Report		
	Samuel, sy Series parent recount	Original	Revised 2	Obligated	al Actual Cost   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)	1,070,421		45,000	23,898.82	
21	Amount of line 20 Related to LBP Activities	1,070,421		45,000	23,090.02	
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					
Signati	ure of Executive Director Date	Signature	of Public Housi	ng Director	Date	

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

Authority			Grant Type and Number Capital Fund Program Grant No: KY36P00450115 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal	Federal FFY of Grant: 2015			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories		Development Account No.	Quantity	Total Estir	mated Cost	Total Actual	Cost	Status of Work	
					Original	Revised 1	Funds Obligated <sup>2</sup>	Funds Expended <sup>2</sup>		
PHA-Wide	Operations		1406				- Ungared	Saperided		
PHA-Wide	Management Improvements		1408							
PHA-Wide	Administration		1410							
PHA-Wide	Moving to Work Demonstratio	n	1492			1,070,421	45,000	23,898.82		

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>&</sup>lt;sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> RHF funds shall be included here.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

PHA Name: Lexington-Faye	A Name: Lexington-Fayette Urban County Housing Authority								
Development Number Name/PHA-Wide Activities		d Obligated Ending Date)		s Expended Ending Date)	Reasons for Revised Target Dates <sup>1</sup>				
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date					
1492 Moving to Work Demonstration									
		5C =							

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

#### APPENDIX A – HARDSHIP POLICY

This policy is applicable to LHA housing programs excluding the HCV Rent Reform Study and MTW Activity 17.

A Hardship Review Committee will be created to review individual cases of significant rent burdens or rent increases for families. Residents can request a Hardship Waiver Request form from their housing management office. The Hardship Review Committee will review hardship requests on a case-by-case basis.

The hardship committee will consist of at least two people on of which must by a senior LHA public housing or housing choice voucher management staff member.

In order to qualify for a hardship exemption, the household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:

- The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
- A death has occurred in the family which eliminates a prior source of income; or
- Other circumstances determined to warrant an exemption by the LHA.

The qualifying financial hardship must be long-term (a minimum of 4 months) and will set the household's Total Tenant Payment (TTP) at 30 percent of current income, but no lower than the minimum rent for up to six (6) months.

Until the request for a hardship exemption is reviewed and approved by the LHA Hardship Review Committee, the participating household is expected to continue to pay its portion of the rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination/eviction.

The Hardship Review Committee will send decisions to the housing manager within five (5) business days of receiving verification of all necessary information, such as income, social security benefits, etc., associated with the hardship request.

If the resident disagrees with the Hardship Review Committee's decision they can request a grievance hearing. The LHA will take no action to change a resident's rent in cases where a grievance hearing has been requested until such time as the grievance process has concluded.

If the resident is approved for a hardship and the hardship expires, the resident can re-apply as needed. There is no limit on the number of hardship requests that can be made.

The Hardship Review Committee will consist of at least two people. One of whom will be a member of LHA's senior staff. Public Housing management teams or HCV management will not review hardship requests submitted for tenants that report to their management team or HCV office.

#### **APPENDIX B – HARDSHIP POLICY (ACTIVITY 17)**

#### **Hardship Policy for Interim Re-examinations**

The LHA will adopt a policy that may limit the ability of a participating family to request an interim reexamination between normally scheduled annual re-examinations. This restriction applies to all households who are not defined as elderly or disabled households. However, a household will be exempted from the limit of one rent decrease each year if it qualifies for a hardship exemption. To be considered for a hardship exemption the participant household must demonstrate that it is experiencing a financial hardship due to an unexpected or unprecedented economic burden on the family.

At any time between required annual re-examinations and after one interim reduction in rent, a family residing in public housing may submit a written request for an exemption to the interim rent reduction policy. A household must meet the following requirements in order to receive a hardship exemption; all cases will be reviewed on a case-by-case basis:

- 1. The participant household must provide proof it is unable to continue to pay the current rent share because of a financial hardship, including:
  - The family's income has decreased because of loss of employment through no fault of the family and the family demonstrates efforts towards regaining employment;
  - A death has occurred in the family which eliminates a prior source of income; or
  - Other circumstances determined to warrant an exemption by the LHA.
- 2. The qualifying financial hardship must be long-term (a minimum of 4 months).
- 3. Allowing an additional interim re-examination beyond the normal one-per-year option could lower the household's rent (but only as low at the \$150 minimum rent) for up to 6 months.
- 4. Setting the household's rent at the minimum level for up to 6 months.
- 5. Setting the household's TTP at 30 percent of current income (but no lower than the \$150 minimum rent), for up to 6 months.

Until the request for a hardship exemption is reviewed and approved by the LHA the participating household is expected to continue to pay its portion of rent and utilities as previously agreed. The family is required to abide by all other requirements for continued occupancy and failure to do so is grounds for termination.