

ANNUAL REPORT



MOVING TO WORK

2021



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Section I.

Introduction

Heading into 2021 we were looking forward to putting COVID-19 behind us and moving forward with plans that were put on hold in 2020 as we hunkered down and waited for the pandemic's retreat. Unfortunately, except for a few weeks of respite here and there, COVID-19 stayed with us in 2021, once again forcing us to shelve many of our capital plans and pare back or cancel events and activities at our properties.

While the pandemic pushed us to think differently about our organization and its place in, and responsibility to, our broader community, it also reaffirmed the tremendous effectiveness of the Moving to Work program as a public policy tool. Thanks to more than two decades in the program, we had long ago implemented administrative reforms that allowed us to reduce the need for face-to-face interactions with residents, voucher holders and landlords. We were already well down the road towards controlling the frequency of contacts with the people we serve and with whom we do business when the pandemic began and had little need to pursue COVID-specific waivers made available to other Public Housing Authorities (PHAs).

The pandemic shined a bright light on the usefulness, and efficacy of allowing PHAs, which are creatures of local design, to operate local programs and to respond to local challenges with locally appropriate solutions. Little did the Congress know when it created MTW in 1996 that the objectives it established for the program would lead to reforms that would help keep people safe from a global pandemic twenty-five years later. Those objectives are:

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

As of this writing the latest COVID-19 surge appears to be cresting and we are, again, contemplating a post-pandemic world. It is our hope that the Congress and HUD will take this opportunity to carefully examine the lessons learned over the past two years. We urge the Department to remember that its response to the pandemic was to provide all PHAs with many of the same regulatory waivers as MTW PHAs have enjoyed for decades. This was the correct response. When the safety of our communities was most threatened, HUD acknowledged that PHAs were best positioned to determine how to streamline their work while maintaining the transparency and accountability necessary to ensure the public's trust.

Just as lessons learned from MTW informed much of the Housing Opportunity Through Modernization Act of 2016 (HOTMA), the Congress and HUD should look for ways to make waivers available to PHAs during the pandemic – many of which have been available to MTWs for years – broadly available and permanent. Throughout the pandemic PHAs demonstrated that when given the opportunity, they can make sensible operational and administrative reforms that improve the delivery of services without compromising or diminishing their accountability or transparency to their federal partners. We hope that these lessons will not be lost on the Congress and HUD.



Introduction

KH's Long Term Vision

Every five years Keene Housing undertakes a lengthy strategic planning process. This process includes soliciting feedback and ideas from a variety of stakeholders including residents, voucher holders, funders, lawmakers, and partners. The MTW office is amongst those we rely on for feedback during the strategic planning process and we are grateful to the MTW staff for their contributions.

Each strategic plan describes our operational, organizational and development goals for the coming five years. The Board of Commissioners approved the current Strategic Plan at the close of 2019, setting our course for the coming five years (2020-2025). The strategic plan established goals in the following areas:

- Real estate preservation and expansion;
- Energy conservation and sustainability;
- Financial management and oversight;
- Property management;
- Care for our elderly and disabled residents and voucher holders;
- Working families' economic development;
- Supporting KH youth through the Keene Housing Kids Collaborative;
- Board and staff capacity and skills;
- Customer service and operational efficiency; and
- Affordable Housing Advocacy.

At the end of each year our staff and Board reviews the progress we've made towards accomplishing the goals and objectives laid out in the strategic plan. Afterwards the plan is revised to track our progress towards those goals and objectives. This process is repeated each year until the next five-year plan is developed and adopted by the Board. A copy of the 2020-2025 Strategic Plan is included in Appendix I of this report.



KH's Short-term Goals

Looking back at the short-term goals articulated in the 2021 MTW Annual Plan, we have much to be proud of. Our short-term goals in 2021 were focused on keeping our residents, staff, and insofar as possible, our community safe as the pandemic pummeled our region. We are grateful that, despite at times living in the state with the highest infection rate in the nation, we have not experienced any large breakouts at our properties or amongst our staff.

We are thankful to our national and local healthcare partners for bringing vaccine clinics to our properties early and often. We are grateful to our City Council for mandating that masks be worn in multifamily properties, making it easier for us to enforce the mask mandate we put in place prior to the City's. We are grateful to our residents for largely adhering to mask mandates, and for being patient when community events and programs were suspended for safety concerns. We are also grateful to our residents for being respectful to one another and our staff during a very difficult time.

Most of all, though, we are grateful to our staff. They achieved a 100% vaccination rate without a mandate (there is vaccine mandate for new hires). Staff adapted with aplomb as we transitioned from our pre-pandemic work life, to going fully remote, to returning to the office - albeit with greater flexibility for many to work from home when and if they choose. Our staff endured unprecedented changes in staffing levels as longtime colleagues retired or chose different life paths, leaving those behind to take on new responsibilities while we struggled to hire new staff. Our successfully navigating two years of the pandemic is a testament to the resiliency and adaptability of our amazing staff.





Section II.

General Housing Authority Operating Information

Housing Stock Information

Keene Housing owns or manages approximately 600 units of commercial and affordable housing including 3 properties supported in part by a HUD Project Based Section 8 (PBRA) contract, 7 Low Income Housing Tax Credit (LIHTC) properties, 2 homes for chronically mentally ill, 1 transitional housing property in 20 affordable developments and small scattered site properties across Marlborough, Keene and Swanzey.

MTW plays an integral part in the management of our entire portfolio. Both our former public housing portfolio and many of our LIHTC properties include MTW Project Based Voucher (PBV) subsidies; area homeless shelters utilize sponsor-based subsidies provided through our Transitional Housing Assistance Subsidy Program (THASP).



General Operating Information

New Housing Choice Vouchers that were Project Based During the Fiscal Year

Table 1. Actual new PBVs issued in FY2021.

Property Name	Number of Project-Based Vouchers		Status at End of Plan Year	RAD?	Description of Project
	Planned	Actual			
Scattered Sites 2	30	30	Committed	N/A	30 units of various size and style throughout Cheshire County with a HAPC for 30 units
Hampshire House	18	18	Committed	N/A	18 unit SRO property with a HAPC for 18 units

Table 2. Actual Existing Project Based Vouchers

Property Name	Number of Project-Based Vouchers		Status at End of Plan Year**	RAD?	Description of Project
	Planned*	Actual			
Ash Brook	24	5	Committed	No	24 1-bedroom row and townhouse style units with a HAPC for 24 units
Brookbend East	11	11	Leased	No	40 LIHTC/MF two- and three-bedroom townhouse style units with a HAPC for 11 units
Brookbend West	10	10	Leased	No	35 LIHTC/MF two- and three-bedroom townhouse style units with a HAPC for 10 units
Cheshire Housing Trust	20	20	Leased	No	20 third-party owned and managed units of various size and style throughout Cheshire County with a HAPC for 20 units
Cottage Street	3	3	Leased	No	3 two- and three-bedroom units with a HAPC for all 3 units
Evergreen Knoll	3	3	Leased	No	32 LIHTC/RD two- and three-bedroom townhouse style units with a HAPC for 3 units
Keene Affordable Housing Properties	212	212	Leased	No	212 former public housing units with a HAPC for 212 units
Riverbend	24	24	Leased	No	24 LIHTC two- and three-bedroom townhouse style units with a HAPC for 24 units
Stone Arch Village Family	24	23	Leased	No	24 LIHTC two- and three-bedroom townhouse style units with a HAPC for 24 units
Stone Arch Village Senior	33	31	Leased	No	33 senior/disabled one- and two-bedroom units in mid-rise building with a HAPC for 33 units
	364	342			

* Figures and text in the "Planned" column should match the corresponding Annual Plan.

** Select "Status and the End of Plan Year" from Committed, Leased/Issued



General Operating Information

Differences between the Planned and Actual Number of Vouchers Newly Project-Based:

The differences in planned and actual number of units are attributed to units offline for rehab, over income households, and vacancies.

Other Changes to the Housing Stock That Occurred During the Fiscal Year

KH purchased several scattered sites in Keene and Swanzey consisting of forty-eight units of various sizes including an eighteen (18) unit SRO property in downtown Keene.

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

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

Leasing Information

The tables on the following pages provide details on the families served by KH. The first section is a snapshot and unit information on the number of households served through Public Housing and MTW Housing Choice Vouchers. The second section provides information about the families served through KH’s Transitional Housing Assistance Subsidy Program (THASP), a local, non-traditional MTW funded program. The third section provides an overview of the mix of families served by KH through our traditional MTW Housing Choice Voucher (HCV) program. The final section reports on households participating that successfully transitioned out of housing assistance in FY2021.

Table 1. Actual Number Households Served

Number of Households Served Through:	Number of Unit Months Occupied/Leased*		Number of Households Served**	
	Planned^^	Actual	Planned	Actual
MTW Public Housing	0	0	0	0
MTW Housing Choice Vouchers (HCV) Utilized	7044	6877	587	573
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	804	780	67	65
Local, Non-Traditional: Homeownership	48	48	4	4
Planned/Actual Totals	7896	7705	658	642

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).

^^ Figures and text in the "Planned" column should match the corresponding Annual Plan.



Table 2. Actual Issues/Solutions Related to Leasing

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	N/A
MTW Housing Choice Voucher	COVID-19 pandemic slowed the eligibility and leasing processes.
Local, Non-Traditional	Deconcentration of shelter guests due to the pandemic lowered the number of actual households served.

Table 3. Households Receiving Local Non-traditional Services

Households Receiving Local, Non-Traditional Services Only	Average Number of Households per Month	Total Number of Households in the Plan Year
N/A	N/A	N/A

Wait List Information

Waiting List Name	Description	Number of Households on Waiting list	Waiting List Open, Partially Open or Closed	Was the Waiting List Opened During the Plan Year?
MTW Project Based Voucher	Site-based	647	Open	N/A
MTW Housing Choice Voucher	Community-wide	2148	Open	N/A
PBV Mobility	Site-based	146	Partially Open	N/A



General Operating Information

Duplications of applicants across waiting lists.

If eligible, applicants may choose and be placed on both the site-based Project-Based waiting list/s and the Housing Choice Voucher waiting list.

Actual Changes to the Waiting List/s in the Plan Year

There were no changes to the waiting lists in FY2021.

Households Served through Local Non-Traditional MTW Funded Programs

Table 1. Number of Households Served at the End of the Fiscal Year (Number of Households Served)

Local, Non-Traditional Category	MTW Activity Name/Number	Number of Unit Months Occupied/Leased*		Number of Households Served**	
		Planned^^	Actual	Planned	Actual
Tenant-Based	N/A	0	0	0	0
Property-Based	Transitional Housing Assistance Shelter Program 1999.06.HC	804	780	67	65
Homeownership	MTW Homeownership Flat Subsidy 2008.03.HC	48	48	4	4
Planned/Actual Totals		852	828	71	69

* The sum of the figures provided should match the totals provided for each Local, Non-Traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.



General Operating Information

Table 2. Actual Issues/Solutions Related to Leasing

Housing Program	Description of Actual Leasing Issues and Solutions
MTW Public Housing	<p>Issues related to leasing:</p> <ul style="list-style-type: none"> Keene Housing does not have any public housing units
MTW Housing Choice Voucher	<p>Issues related to leasing:</p> <ul style="list-style-type: none"> Covid-19 pandemic Increasing rents, low vacancy rates and housing stock shortage <p>Solutions related to leasing:</p> <ul style="list-style-type: none"> Development of affordable housing (planned) Landlord incentives (CARES Act funding) and marketing campaign
Local, Non-Traditional	<p>Issues related to leasing:</p> <ul style="list-style-type: none"> No issues related to leasing

Households Served Through Local Non-Traditional Services Only

Table 1. Average and Total Number of Households Served at the End of the Fiscal Year

	Average Number of Households Served Per Month	Total Number of Households Served During the Year
Households Served through Local, Non-Traditional Services Only	0	0

Explanation for Differences Between Planned and Actual Households Served

Reallocation and addition of staff, to expedite waitlist management and voucher issuances.



General Operating Information

Reporting Compliance with Statutory MTW Requirements

HUD will verify compliance with the statutory objective of “assuring that at least 75 percent of the families assisted by the Agency are very low-income families” is being achieved by examining public housing and Housing Choice Voucher family characteristics as submitted into the PIC or its successor system utilizing current resident data at the end of the agency’s fiscal year. The PHA will provide information on local, non-traditional families provided with housing assistance at the end of the PHA fiscal year, not reported in PIC or its successor system, in the following format:

Table 1. 75% of Families Assisted are Very Low-Income

Income Level	Number of Local, Non-Traditional Households Admitted in the Plan Year
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	243

* Includes “Local, Non-Traditional: Tenant-Based”; “Local, Non-Traditional: Property-Based”; and “Local, Non-Traditional: Homeownership”.

Reporting Compliance with Statutory MTW Requirements: Maintain Comparable Mix

In order to demonstrate that the statutory objective of “maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration” is being achieved, the PHA will provide information in the following formats:



General Operating Information

Table 2. Baseline for the Mix of Family Sizes Served (FY 1999)

Family Size	Occupied Number of Public Housing units by Household Size when PHA Entered MTW	Utilized Number of Section 8 Vouchers by Household Size when PHA Entered MTW	Non-MTW Adjustments to the Distribution of Household Sizes	Baseline Number of Household Sizes to be Maintained	Baseline Percentages of Family Sizes to be Maintained
1 Person	0	316	0	316	54%
2 Person	0	118	0	118	20%
3 Person	0	80	0	80	14%
4 Person	0	44	0	44	8%
5 Person	0	17	0	17	3%
6+ Person	0	10	0	10	2%
Totals	0	585	0	585	100%

Explanation for Baseline Adjustments to the Distribution of Household Sizes Utilized N/A

Table 3. Actual Mix of Family Sizes Served

	1 Person	2 Person	3 Person	4 Person	5 Person	6+ Person	Totals
Baseline Percentages of Household Sizes to be Maintained**	54%	20%	14%	8%	3%	2%	100%
Number of Households Served by Family Size this Fiscal Year***	303	85	64	30	20	11	513
Percentages of Households Served by Household Size this Fiscal Year****†	59%	17%	12%	6%	4%	2%	100%
Percentage Change	5%	-3%	-2%	-2%	1%	0%	0%

* "Non-MTW adjustments to the distribution of family sizes" are defined as factors that are outside the control of the PHA. Acceptable "non-MTW adjustments" include, but are



General Operating Information

not limited to, demographic changes in the community's population. If the PHA includes non-MTW adjustments, HUD expects the explanations of the factors to be thorough and to include information substantiating the numbers used.

** The numbers in this row will be the same numbers in the chart above listed under the column "Baseline percentages of family sizes to be maintained."

*** The methodology used to obtain these figures will be the same methodology used to determine the "Occupied number of Public Housing units by family size when PHA entered MTW" and "Utilized number of Section 8 Vouchers by family size when PHA entered MTW" in the table immediately above.

**** The "Percentages of families served by family size this fiscal year" will reflect adjustments to the mix of families served that are directly due to decisions the PHA has made. HUD expects that in the course of the demonstration, PHAs will make decisions that may alter the number of families served.

†Does not include households served through KH's local non-traditional MTW programs, THASP and Project MARCH.

Description of any Issues Related to Leasing of Public Housing, Housing Choice Vouchers, or Local, Non-Traditional Units and Solutions at Fiscal Year End

Table 4. Leasing issues during fiscal year by program.

Housing Program

HCV Program

Description of Leasing Issues and Solutions

Housing issues included COVID-19 pandemic, increasing rents, low vacancy rates, and housing stock shortage. Administrative changes included the reallocation/addition of staff to expedite waitlist management and voucher issuances.

Number of Households Transitioned to Self-Sufficiency in the Plan Year

KH uses two definitions for self-sufficiency. The first definition, "economic self-sufficiency", counts households that leave housing assistance through KH's \$0 HAP Threshold activity. Households who meet this criteria have increased their income enough that KH's Housing Assistance Payment (HAP) is reduced to \$0. After six months at \$0 HAP, KH determines that the household no longer requires housing assistance and the household's participation in the voucher program is ended.

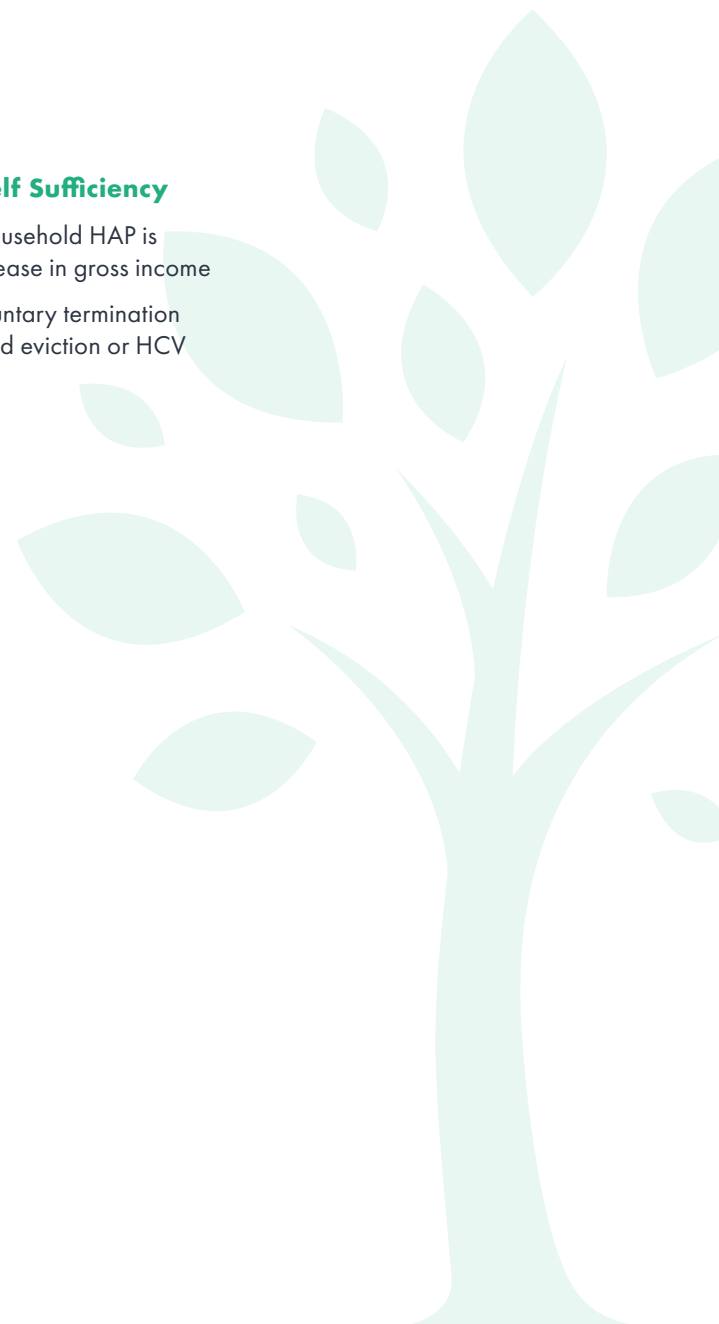
KH's second definition, "personal self-sufficiency", counts households that voluntarily terminate participation. Generally, these households leave the program because they have found a way to afford housing without KH's assistance. In some cases, a household may have found housing that better suits their needs at a lower price or where housing costs are offset in some way, such as becoming a live-in aid. In other cases, a household may have reduced their debt to the point that they feel they can afford rent without assistance, purchased a home without KH assistance, or found a job outside of our jurisdiction and do not feel that porting out is worth the required time and paperwork. KH does not include households who choose to terminate their participation to avoid eviction or termination from the HCV program for non-compliance as having attained self-sufficiency.



General Operating Information

Table 1. Number of Households Transitioned To Self-Sufficiency by Fiscal Year End

Activity Name/#	Number of Households Transitioned	Agency Definition of Self Sufficiency
\$0 HAP Rent Burden Test/ 2013.01.SS	7	Economic self-sufficiency: Household HAP is reduced to \$0 due to an increase in gross income
Resident Self-Reliance/ 1999.05.SS	12	Personal self-sufficiency: Voluntary termination for reasons other than to avoid eviction or HCV program termination
Households Duplicated Across Activities/ Definitions	0	
Annual Total Number of Households Transitioned to Self-Sufficiency	29	



Section III.

Proposed MTW Activities

All proposed activities that are granted approval by HUD are reported in Section IV as 'Approved Activities'.



Section IV.

Approved MTW Activities

The following table indexes all current MTW Activities with statutory objective, authorization cited, approval and implementation year, and status.

Activity Name	Plan Year	Activity Type	Primary Statutory Objective	Status
Alternative Rent Burden Threshold	FY1999	Rent Reform	Expand Housing Choices	Ongoing
Eligibility Administration for Section 8 HCV Program	FY1999	Admission Policy	Expand Housing Choices	Ongoing
HQS Landlord Self-Certification Inspection Program	FY1999	Inspection Policy	Cost Effectiveness	Ongoing
Rent Reasonableness Neighborhood Analysis Discontinuance	FY1999	Rent Reform	Expand Housing Choices	Ongoing
Resident Self-Reliance Program	FY1999	Resident Services	Self-Sufficiency	Ongoing
Stepped Subsidy Rent Reform	FY1999	Rent Reform	Self-Sufficiency	Ongoing
Unit Rent Reasonableness Analysis Discontinuance	FY1999	Rent Reform	Expand Housing Choices	Ongoing
Transitional Housing Assistance Subsidy Program	FY2000	Supportive Housing Partnership	Expand Housing Choices	Ongoing
Income Based Alternative Recertification Schedule	FY2005	Rent Reform	Cost Effectiveness	Ongoing
Stepped Subsidy Alternative Recertification Threshold	FY2005	Rent Reform	Cost Effectiveness	Ongoing
Standard Deductions	FY2006	Rent Reform	Cost Effectiveness	Closed Out
MTW Homeownership Program	FY2008	Homeownership	Expand Housing Choices	Ongoing

Approved MTW Activities

Activity Name	Plan Year	Activity Type	Primary Statutory Objective	Status
Project-Based Voucher Program	FY2008	Project Based Initiatives	Expand Housing Choices	Ongoing
Restrictions on Section 8 Portability	FY2008	Mobility and Portability	Cost Effectiveness	Ongoing
Housing Quality Standards (HQS) Biennial Inspection Schedule	FY2011	Inspections Policy	Cost Effectiveness	Closed Out
\$0 HAP Rent Burden Test	FY2013	Occupancy Policy	Cost Effectiveness	Ongoing
HQS Alternative Inspection Protocol	FY2013	Inspection Policy	Cost Effectiveness	Closed Out
Affordable Housing Preservation and Modernization Program	FY2014	Use of Funds	Expand Housing Choices	Ongoing
Affordable Housing Preservation Program (AHPP)	FY2014	Project Based Initiatives	Expand Housing Choices	Ongoing
Asset Exclusion Threshold	FY2014	Rent Reform	Self-Sufficiency	Ongoing
Keene Housing Kids Collaborative	FY2014	Use of Funds	Self-Sufficiency	Ongoing
Medical Deduction Threshold	FY2014	Rent Reform	Cost Effectiveness	Ongoing
AHPP Alternative Inspection Protocol	FY2016	Inspection Policy	Cost Effectiveness	Ongoing
AHPP Rent Reform	FY2016	Rent Reform	Cost Effectiveness	Ongoing
Earned Income Disallowance (EID) Discontinuance	FY2016	Rent Reform	Cost Effectiveness	Ongoing
Project-Based Unit Agency Conducted Inspections	FY2016	Inspection Policy	Cost Effectiveness	Ongoing
Project M.A.R.C.H. (Monadnock Area Resources Curing Homelessness)	FY2016	Supportive Housing Partnership	Expanding Housing Choices	Closed Out
PBV Mobility Wait List	FY2017	Mobility and Portability	Expanding Housing Choices	Ongoing



Approved MTW Activities

Activity Name	Plan Year	Activity Type	Primary Statutory Objective	Status
Local Payment Standard	FY2017		Expanding Housing Choices	Ongoing
Mainstream Rent Reform	FY2020	Rent Reform	Cost Effectiveness	Ongoing
Foster Youth to Independence Tenant Protection Vouchers Rent Reform	FY2020	Rent Reform	Cost Effectiveness	Ongoing
Foster Youth to Independence Tenant Protection Vouchers Development Grants	FY2020	Rent Reform	Self-Sufficiency	Ongoing

Implemented Activities

1999.01.HC ELIGIBILITY ADMINISTRATION GUIDELINES

Plan Year Approved: 2000 Year Implemented: 2000

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

In addition, Keene Housing added a \$100,000 asset threshold to our MTW program's eligibility guidelines in 2014. When determining eligibility, KH calculates anticipated income by applying all applicable income sources as described at 24 CFR 5.609. If the calculated income is 80% AMI or less, KH applies the asset threshold as a second layer for eligibility determination. Applicant households with assets of \$100,000 or more are not eligible for assistance even if the applicant's anticipated income falls at or below the 80% AMI threshold.

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



Approved MTW Activities

Benchmarks and Outcomes

HC #4: Displacement Prevention

Unit of Measurement	Baseline 2007	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	228	0	0	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.

2008.03.HC MTW HOMEOWNERSHIP FLAT SUBSIDY

Plan Year Approved: 2009 Year Implemented: 2009

In 2005 Keene Housing created its MTW Homeownership program as part of its Public Housing Resident Opportunities for Self-Sufficiency (ROSS) grant under the Family Self-Sufficiency (FSS) program (now Resident Self-Reliance). Over the course of administering the program, KH found that some households who expressed interest in homeownership were near 80% AMI when they began the process of meeting the program's requirements - such as homeownership counseling. As this process may take up to a year, it was possible that a household may have had income in excess of 80% AMI by the time a home was located and a lender secured. To avoid penalizing homeownership participants who increased their income above 80% AMI while in the process of finding a home, Keene Housing initiated, with HUD approval of our FY2008 Annual Plan, a flat subsidy for families in the Homeownership Program with incomes between 80% AMI and 140% AMI.

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

One new Homeowner Voucher was issued in 2021.



Approved MTW Activities

Benchmarks and Outcomes

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline 2007	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of this activity (increase).	0	0	0	Yes

HC #6: Increase in Homeownership Opportunities

Unit of Measurement	Baseline 2007	Benchmark	Outcome	Benchmark Achieved?
Number of households that purchased a home as a result of the activity (increase).	1	1	1	Yes

Challenges to Achieving Benchmarks

In 2021, 3 households became homeowners through programs other than KH’s. There were no significant changes to this activity.

Benchmarks and Outcomes

1999.03.CE RENT REASONABLENESS NEIGHBORHOOD ANALYSIS DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

Under the traditional HCV program, each Public Housing Authority (PHA) is required to develop and maintain a database of rental units in the PHA’s jurisdiction. The development of this database often requires extensive administrative time and experience surveying existing rental units based on unit size, neighborhood, and amenities provided. In addition, the database must be updated annually in coordination with HUD’s release of Fair Market Rents. KH found that the annual maintenance of this data tended to be administratively demanding with very little return, as the Monadnock region’s rental market is incredibly tight with little variance from neighborhood to neighborhood or town to town. As it is KH’s belief that the household, not KH, is the best judge of what an appropriate rent is, KH determined that the annual neighborhood analysis for rent reasonableness was unnecessary and discontinued the practice in 2000.



Approved MTW Activities

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$470	\$0	\$0	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	19	0	0	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.



Approved MTW Activities

1999.07.HC REASONABLE RENT DETERMINATION DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

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

During the issuance briefing, KH staff educates applicants on how factors relating to rent reasonableness – such as location, unit size, unit type, accessibility, amenities, tenant paid utilities, and maintenance – contribute towards a reasonable rent. The education and support provided by KH continues throughout the applicant’s housing search and during their rent negotiations with prospective owners.

Since KH first proposed this activity, we have seen a significant increase in the number of households we serve that are elderly or disabled. Due to their unique needs, many find it difficult to locate affordable housing with needed amenities in the area’s tight housing market. In addition, many of our new Stepped Subsidy participants lack the needed skills to determine what is a reasonable rent. We have proposed to re-institute the rent reasonableness calculation for our participants who are elderly, disabled, or entering in Step 1 of the Stepped Subsidy program as part of our Amended FY2018 MTW Plan.

Pursuant to our Amended FY18 MTW Plan, Keene Housing amended this activity necessitating a revision to the metrics to better match the measured outcomes. HUD Metric CE#6: Reducing Per Unit Subsidy Costs for Participating Households replaces CE#1 Agency Cost Savings. The new baseline and benchmark are based on 2018 data.

Benchmarks and Outcomes

CE #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline 2018	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy, (or local, non-traditional subsidy) per household affected by this policy in dollars (decreased).	\$638	\$630	\$587	Yes



Approved MTW Activities

Keene Housing Local Metric(s)

In addition to the required metric(s) developed by HUD, KH also utilizes the following local metric(s) to monitor program efficacy.

KH: Percentage of Rent Burdened Households (excluding Stepped Subsidy Households*)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of households with a rent burden above 40% gross monthly income.	0	5%	7%	No

*Rent burden of households participating in the Stepped Subsidy program can be found under the Stepped Subsidy activity (page 44).

Challenges to Achieving Benchmarks

Our tightening rental market resulted in more voucher holders renting units that exceeded the voucher payment standard, which in turn resulted in greater rent burdens. No changes were made to the metrics and data collection. There were no significant changes to this activity.

1999.08.HC 40% AFFORDABILITY DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

KH believes the best judge of what a household’s priorities are in relation to housing is a well-informed household. In our first MTW Plan, KH eliminated the 40% affordability rule in its MTW programs. Instead, households are counseled during the issuance briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing units that create high rent burdens. Once a unit is chosen, KH calculates the household’s proposed rent burden and, if it exceeds 40%, KH allows the household the opportunity to demonstrate that they can manage the higher rent burden. Households who choose a high rent burden are not eligible for Safety Net unless a change in circumstances causes their rent burden to exceed their rent burden at lease-up.

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$470	\$0	\$0	Yes



Approved MTW Activities

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	19	0	0	Yes

Keene Housing Local Metric(s)

In addition to the required metric(s) developed by HUD, KH also utilizes the following local metric(s) to monitor program efficacy.

KH: Percentage of Rent Burdened Households (excluding Stepped Subsidy Households*)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of households with a rent burden above 40% gross monthly income.	0%	5%	7%	No

*Rent burden of households participating in the Stepped Subsidy program can be found under the Stepped Subsidy activity.

Challenges to Achieving Benchmarks

Our tightening rental market resulted in more voucher holders renting units that exceeded the voucher payment standard, which in turn resulted in greater rent burdens. No changes were made to the metrics and data collection. There were no significant changes to this activity.

1999.04.CE STEPPED SUBSIDY RENT REFORM

Plan Year Approved: 2000 Year Implemented: 2000

The Stepped Subsidy activity introduced a three (3) stepped subsidy structure for all work-able and interested elderly/disabled families. All households receiving assistance under Stepped Subsidy are required to participate in the Resident Self-Reliance (RSR) program (page 32). Rather than paying 30% of adjusted income for rent, residents pay only 20% of gross income towards rent in the first two years. After two years the subsidy is reduced at Year 3 to 65% of the Voucher Payment Standard (VPS) for which they are eligible, and again at Year 4 to 45% of VPS (see table below).



Approved MTW Activities

Table 4. 2021 Voucher Payment Standard by Bedroom Size and Step Subsidy Level

# BR	VPS	Step 1 HAP	Step 2 HAP (65% of VPS)	Step 3+ HAP (45% of VPS)
SRO	\$597	VPS-20% Gross Income = Subsidy	\$390	\$270
0	\$797	VPS-20% Gross Income = Subsidy	\$520	\$360
1	\$868	VPS-20% Gross Income = Subsidy	\$560	\$390
2	\$1118	VPS-20% Gross Income = Subsidy	\$730	\$500
3	\$1455	VPS-20% Gross Income = Subsidy	\$950	\$650
4	\$1623	VPS-20% Gross Income = Subsidy	\$1050	\$730

In 2021, 157 households participated in Stepped Subsidy with 17 (11%) moving out of housing assistance and into self-sufficiency.

Hardship Requests and Outcomes

KH administers a hardship program, Safety Net, for all MTW PBV and HCV households. The Safety Net program provides temporary relief to participating households experiencing significant, unexpected increases in rent burden. As Safety Net is not meant to take the place of employment for Stepped Subsidy households. As such applications for Safety Net must be submitted monthly except in limited situations, such as an extended medical leave.

The Safety Net Committee may require a Safety Net applicant to complete an action plan to remedy the hardship, such as applying for unemployment benefits, as one of the requirements for receiving additional housing assistance. Repeat Safety Net recipients, may also be required to revisit their Three Year Action Plan for RSR (page xx) with their Resident Services Coordinator (RSC).

In 2021, KH received 45 Safety Net applications. Of those, 93% (42) were approved and 7% (3) were denied.



Approved MTW Activities

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$12,162	\$3,832	\$1,309	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	492	155	56	Yes

Keene Housing Local Metric(s)

In addition to the required metric(s) developed by HUD, KH also utilizes the following local metric(s) to monitor program efficacy.

KH: Percentage of Rent Burdened Households

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of households suffering a rent burden above 40% gross monthly income.	0	5%	17%	No

Challenges to Achieving Benchmarks

COVID remained the overwhelming contributing factor for households whose rent burdens exceeded 45%. Unemployed households accounted for 53% of all households with families citing lack of childcare as the primary reason for their unemployed status. The other 47% are employed part-time to accommodate having to remove their children from school for COVID related reasons.



Approved MTW Activities

2013.01.SS \$0 HAP RENT BURDEN TEST

Plan Year Approved: 2013 Year Implemented: 2013

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

Benchmarks and Outcomes

SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Households transitioned into self sufficiency (increase).	1	2	7	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.

1999.05.SS RESIDENT SELF-RELIANCE (RSR) PROGRAM

Plan Year Approved: 2000 Year Implemented: 2000

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



Approved MTW Activities

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

- Household Stability
- Wellness and Healthy Relationships
- Education and Training
- Financial Management
- Employment and Household Management
- Individualized Goal Setting Plans

Within ninety (90) days of lease-up, new participants meet with a Resident Service Coordinator (RSC) for an assessment session. The assessment session helps identify the Foundational Proficiencies in which the household needs the most support. The assessment session is followed by a goal-setting session where participants develop an individualized 3-year Career Plan to attain competencies in the Foundational Proficiencies where the household needs support. The plan includes specific goals and milestones with dates for completion. Participants are encouraged to consider, and set goals to mitigate, the stepped rent increases that come with participation in the Stepped Subsidy activity.

All households are required to have an active 3-year Career Plan as long as they are receiving housing assistance through the Stepped Subsidy program. Upon completion of a 3-year Career Plan, each participant establishes a new 3-year Career Plan with their RSC.

Development Grants and Rent Credits

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



Approved MTW Activities

In addition, participants can choose to use their Development Grant funds for Rent Credits when they meet established milestones or goals. The amount of the Rent Credit varies with the significance of a participant’s achievement and the amount of funds left in the household’s annual Development Grant fund. Both Development Grants and Rent Credits are available to all RSR participants and are contingent upon funding availability.

Participant Compliance

KH requires RSR participants to attend quarterly one-on-one RSC progress meetings. Participants who miss three (3) progress meetings with their RSC are terminated from the RSR and Stepped Subsidy programs. In addition to the quarterly meetings, participants are encouraged to pursue round table sessions and other seminars relevant to their future plans even if not directly tied to a current goal.

Benchmarks and Outcomes

SS #1: Increase in Household Income

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	\$23,597	\$24,500	\$28,549	Yes



Approved MTW Activities

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
The number of head of households:				
(1) Employed Full-Time	26	34	68	Yes
(2) Employed Part-Time	83	83	19	No
(3) Enrolled in an Educational Program	6	6	7	Yes
(4) Enrolled in Job Training Program	4	4	2	No
(5) Unemployed	18	10	12	No
(6) Other	0	0	10	No
The percentage of work-able households:*				
(1) Employed Full-Time	23%	27%	54%	Yes
(2) Employed Part-Time	65%	65%	15%	No
(3) Enrolled in an Educational Program	5%	5%	6%	Yes
(4) Enrolled in Job Training Program	3%	3%	2%	No
(5) Unemployed	14%	8%	9%	No
(6) Other	0%	0%	8%	No

* May not equal 100% as some individuals may be working and attending an educational or job training program.



Approved MTW Activities

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	5	6	5	Yes

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	110	110	157	Yes

SS#8: Households Transitioned into Self-Sufficiency

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	14	10	17	Yes

Keene Housing Local Metric(s)

In addition to the required metric(s) developed by HUD, KH also utilizes the following local metric(s) to monitor program efficacy.

KH: Households with earned income

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Percentage of households reporting earned income (increase).	86%	90%	68%	No



Approved MTW Activities

KH: Households making progress on Three-Year Career Plan

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving rent credits for meeting Action Plan goals (increase).	0	25	33	Yes

KH: Households terminated for non-compliance

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households terminated for failure to attend quarterly meetings (decrease).	0	2	4	No

KH: Households awarded a Development Grant or Rent Credit

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of households that received Development Grant and Rent Credit funds (increase).	0	25	56	Yes

KH: Total DGRC Funds Distributed

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Total amount of Development Grant and Rent Credit funds awarded to eligible households (increase).	0	\$16,000	\$16,736	Yes

Challenges to Achieving Benchmarks

2021 remained a challenging year for many RSR households. Although most local schools returned to in-person learning at least part time; school closures, illnesses, and mandated preventative quarantine from school and employers made it difficult for households with school-aged children to maintain stable employment and income. Childcare continued to be in short supply, and wait lists were long. The use of Development Grants and Rent Credits declined, due in part to the decrease in goal achievement by households focused on working to pay the bills and providing for their families.

Despite this, unemployment decreased, and many other indicators remained stable; people continued exiting the program to self-sufficiency.



Approved MTW Activities

Those in educational programs and job training, and transitioning to home ownership remained about the same as 2020. There were no significant changes to this activity. No changes to metrics or data collection.

1999.06.HC TRANSITIONAL HOUSING ASSISTANCE SHELTER PROGRAM (THASP)

Plan Year Approved: 2000 Year Implemented: 2000

Keene Housing began providing sponsor-based subsidies to local service provider partners for shelter and transitional housing during its first year in MTW. THASP focuses on helping households most PHAs find hard to assist: those facing immediate and/or long term homelessness, individuals returning to the community from incarceration, and victims of domestic violence fleeing their abusers.

In FY2021, KH provided sponsor-based subsidies for 5 transitional housing programs:

Property Name	Service Provider	Program Description
Water Street Family Shelter	Southwestern Community Services	Year-round homeless shelter for families with children
Roxbury Street Men’s Shelter	Southwestern Community Services	Year-round homeless shelter for men
Monadnock Center for Violence Prevention	Monadnock Center for Violence Prevention	Shelter for victims of domestic violence
Claremont Men’s Shelter	Southwestern Community Services	Year-round shelter for men
Monadnock Street Men’s Shelter	Southwestern Community Services	Year-round shelter for men



Approved MTW Activities

Benchmarks and Outcomes

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	0	166	243	Yes

HC#1: Additional Units of Housing Made Available

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	60	0	No
Households Served: Homeless and hard-to-house.				

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	\$0	\$250,000	\$73,335	No

HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline 1999	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0	425	0	No



Approved MTW Activities

Challenges to Achieving Benchmarks

Southwestern Community Services receives funding through the New Hampshire Bureau of Housing Supports. The funds previously had a match requirement, however in April of 2020, the state implemented a new process for reimbursing emergency shelter programs based on a fee for service model. Programs went from a set budget to a budget that fluctuated based on the daily beds occupied by clients. With the new funding model, New Hampshire emergency shelters are no longer required match 25% of funding from other sources.

SCS reports that THASP income is instrumental in covering the funding voids created by this model. There were no significant changes to this activity. No changes made to data collection.

2005.01.CE ELDERLY AND DISABLED HOUSEHOLD ALTERNATIVE RECERTIFICATION SCHEDULE

Plan Year Approved: 2005 Year Implemented: 2005

Keene Housing does not require elderly and disabled households to participate in the annual recertification process if they do not have net assets exceeding \$50,000 and receive 100% of their income from any fixed income source including, but not limited to:

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

Instead, KH relies on the published Cost of Living Adjustment (COLA) and the Enterprise Income Verification (EIV) system to calculate each household's income. KH notifies households via mail of their new tenant share and subsidy amount. Included with this notice is the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). Households with pension and assets above \$50,000 continue to participate in the regular full annual recertification process.

Keene Housing understands the value of regular contact with HCV participants, particularly elderly and disabled participants, yet the recertification process for many elderly and disabled households can be quite confusing and stressful. To maintain contact with participants in a more productive manner, we hired an Elderly/Disabled Resident Service Coordinator in 2017 to develop the Community Connections program. Community Connections focuses on helping our elderly and disabled residents maintain an active and healthy lifestyle. Our hope is that using proven strategies to facilitate aging in community and aging in place allows our residents to remain independent well into their senior years.



Approved MTW Activities

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$10,968	\$11,448	\$2,840	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	457	477	213	Yes

CE #5: Increase in Agency Rental Revenue

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$129,716	\$129,716	\$168,540	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.



Approved MTW Activities

2005.02.CE STEPPED SUBSIDY ALTERNATIVE RECERTIFICATION SCHEDULE

Plan Year Approved: 2005 Year Implemented: 2005

Households participating in the Stepped Subsidy program currently participate in a recertification at each step change. Upon reaching Step 3, Stepped Subsidy households do not participate in full recertifications.

During years when a household does not have a recertification, KH conducts an Enterprise Income Verification (EIV) system check to test whether or not the household meets the \$0 HAP threshold and is still income eligible. In addition, as all Stepped Subsidy households also participate in RSR and are required to attend quarterly meetings with their RSC; third party verified income and employment data are collected at these meetings. The information collected is used to measure each household’s progress towards their 3-Year Career Action Plan and for evaluating program efficacy. In addition, RSCs collect a new Authorization for Release of Information/Privacy Act Notice (HUD form 9886) when existing 9886s have expired.

Keene Housing made no significant changes to this activity and no changes were made to the metrics and data collection.

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$3,384	\$4,680	\$2,363	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	141	195	78	Yes

CE #5: Increase in Agency Rental Revenue

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$60,262	\$60,262	\$38,150	No



Approved MTW Activities

Challenges to Achieving Benchmarks

Fewer families participated in the Stepped Subsidy Program in 2021 than in 2020 resulting in a decrease in agency rental revenue. There were no significant changes to this activity.

2008.01.HC PROJECT BASED VOUCHER PROGRAM

Plan Year Approved: 2008 Year Implemented: 2008

KH continues operating its local Project Based Voucher (PBV) program, initially approved in 2008. This activity permits Keene Housing to waive regulatory caps on the total HCV inventory KH may project base. KH project bases at least 75% of its available voucher funding plus any funding received for units project based through the AHPP activity. In addition, this activity allows KH to waive the required public process for project basing units within KH owned and managed properties and eliminate the limitations on the percentage of units within a single property or development that may be project based.

Benchmarks and Outcomes

HC #4: Displacement Prevention

Unit of Measurement	Baseline 2007	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	212	0	308	No

Challenges to Achieving Benchmarks

KH added 48 units in 2021. There were no significant changes to this activity. No changes to metrics or data collection.

2008.02.CE RESTRICTIONS ON SECTION 8 PORTABILITY

Plan Year Approved: 2008 Year Implemented: 2008

KH restricts non-elderly, non-disabled households from porting out of our jurisdiction to those households who require a reasonable accommodation unavailable in KH's jurisdiction, are the victims of domestic violence, or can show the move would demonstrably increase their financial stability, such as a new employment or educational opportunity.



Approved MTW Activities

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$288	\$408	\$60	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	12	17	3	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.

2014.01.HC AFFORDABLE HOUSING PRESERVATION PROGRAM (AHPP)

Plan Year Approved: 2014

Year Implemented: 2015

KH proposed and received approval for our Affordable Housing Preservation Program (AHPP) in 2014. Building on the successes of similar initiatives at other MTW Agencies, the program leverages the subsidy provided by the Enhanced Voucher program (Section 8(t) of the U.S. Housing Act) to preserve properties that would otherwise be removed from HUD’s multifamily portfolio.

AHPP accomplishes this by providing property owners the option to opt-out of an expiring Project Based Section 8 contract and convert their properties to PBVs with KH. As vouchers can sometimes provide higher payments than Multifamily contracts, entering into a PBV HAP contract can provide owners access to additional rental revenue and private equity for capital improvements. Additionally, moving from Project Based Section 8 to PBV frees owners from HUD Management Reviews (MOR) as well as restrictions on reserve capitalization and use. KH provides residents the option of remaining in place and converting their Enhanced Voucher to a PBV or taking their Enhanced Voucher to the private market at which time KH will, in most cases, provide a PBV for the vacant unit.

In 2015, KH chose Meadow Road, a KH owned Multifamily Section 8 property, as the first property to convert under this new initiative.



Approved MTW Activities

Benchmarks and Outcomes

HC#2: Units of Housing Preserved

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI as a result of the activity (increase).	0	18	0	No

HC#4: Displacement Prevention

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	18	0	0	Yes

Challenges to Achieving Benchmarks

Keene Housing did not add any new properties to its AHPP program in 2021. There were no significant changes to this activity. No changes to metrics or data collection.

2014.02.CE MEDICAL DEDUCTION THRESHOLD

Plan Year Approved: 2014

Year Implemented: 2014

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



Approved MTW Activities

Hardship Requests and Outcomes

KH received no Safety Net applications in 2020 related to this activity.

Benchmarks and Outcomes

CE#1: Agency Cost Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$1320	\$990	\$1710	No

CE#2: Staff Time Savings

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	110	96	86	Yes

CE #5: Increase in Agency Rental Revenue

Unit of Measure	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$129,716	\$129,716	\$42,905	No

Challenges to Achieving Benchmarks

CE#1 impacted by increase in staff compensation. CE#5 impacted by a decrease in households affected by the activity. There were no significant changes to this activity. No changes to metrics or data collection.

2014.02.SS ASSET EXCLUSION THRESHOLD

Plan Year Approved: 2014 Year Implemented: 2014

In 2014, KH adopted a policy to disregard net assets totaling \$50,000 or less from the income calculation when determining a participant's tenant rent. This policy allowed residents the opportunity to establish and increase assets without being discouraged by a corresponding increase in rent. KH continues calculating imputed value for all assets in the income calculation when a household's total net assets exceed \$50,000.



Approved MTW Activities

Hardship Requests and Outcomes

KH received no Safety Net applications in 2021 related to this activity.

Benchmarks and Outcomes

CE#1: Agency Cost Savings

Unit of Measure	Baseline 2014	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$7440	\$5568	\$0	Yes

CE#2: Staff Time Savings

Unit of Measure	Baseline 2014	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	310	232	0	Yes

CE #3: Decrease in Error Rate of Task Execution

Unit of Measure	Baseline 2014	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0%	<1%	0%	Yes

CE #5: Increase in Agency Rental Revenue

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$189,978	\$189,978	\$206,805	Yes

Challenges to Achieving Benchmarks

Keene Housing does not collect asset information unless the assets are over the threshold. In 2021, 11 households had assets above the \$50,000 threshold. There were no significant changes to this activity. No changes to metrics or data collection.



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2014.04.SS KEENE HOUSING KIDS COLLABORATIVE (KHKC)

Plan Year Approved: 2014 Year Implemented: 2014

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

Benchmarks and Outcomes

Note: While KH provides these metrics as a measure of program efficacy due to HUD requirements, it is important to note that as the activity specifically targets youth, not adults, it is not possible to correlate the program's effectiveness to households that transition to self-sufficiency. KHKC's intent is to help ensure that children growing-up in our properties will be self-sufficient adults, never needing our assistance. As such, the baseline and benchmark for HUD metric SS #8: Households Transitioned to Self-Sufficiency are set to 0. KH respectfully calls attention to this as one of many examples where the 50900 obfuscates, rather than illuminates, an MTW activity's effectiveness or outcomes.

SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	10	15	193	Yes

SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0	0	0	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.



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2014.03.HC AFFORDABLE HOUSING PRESERVATION & MODERNIZATION PROGRAM

Plan Year Approved: 2014 Year Implemented: 2014

In the amended FY2014 Plan, KH created the Affordable Housing Preservation and Modernization Program to address these capital needs. The activity allows KH to address the KH- and KH-affiliate owned portfolio's growing capital needs in a rational way, with a predictable schedule, based on greatest need and economies of scale, rather than in reaction to unpredictable and uncertain grant opportunities. In 2021, KH invested \$1,302,307 in capital renovations.

Benchmarks and Outcomes

HC #2: Units of Housing Preserved

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	0	308	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the data collection. There were no significant changes to this activity.

2015.01.CE AFFORDABLE HOUSING PRESERVATION PROGRAM - RENT REFORM

Plan Year Approved: 2015 Year Implemented: 2015

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

- Triennial recertifications for all households.
- Interim recertifications limited to household composition changes and cases where the total household income permanently drops by



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\$50 per month or more, with access to Safety Net for short term financial hardship.

- The Utility Allowance in effect at the effective date of the last regular recertification used to calculate rents at interim recertifications.
- Household assets with a total net value of \$50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated.
- Applies the Elderly and Disabled Household Alternative Recertification Schedule activity to all eligible households.

By simplifying the recertification and rent calculation process, the activity reduces KH’s administrative burden by lowering administrative costs and staff time. In addition, this policy allows participant households the opportunity to increase earnings and assets without being discouraged from doing so by corresponding increases in rent as is the case in the traditional HCV and public housing programs.

Hardship Requests and Outcomes

KH received no Safety Net applications in 2021 related to this activity.

Benchmark and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$2326	\$2088	\$360	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	99	87	18	Yes



Approved MTW Activities

CE #3: Decrease in Error Rate of Task Execution

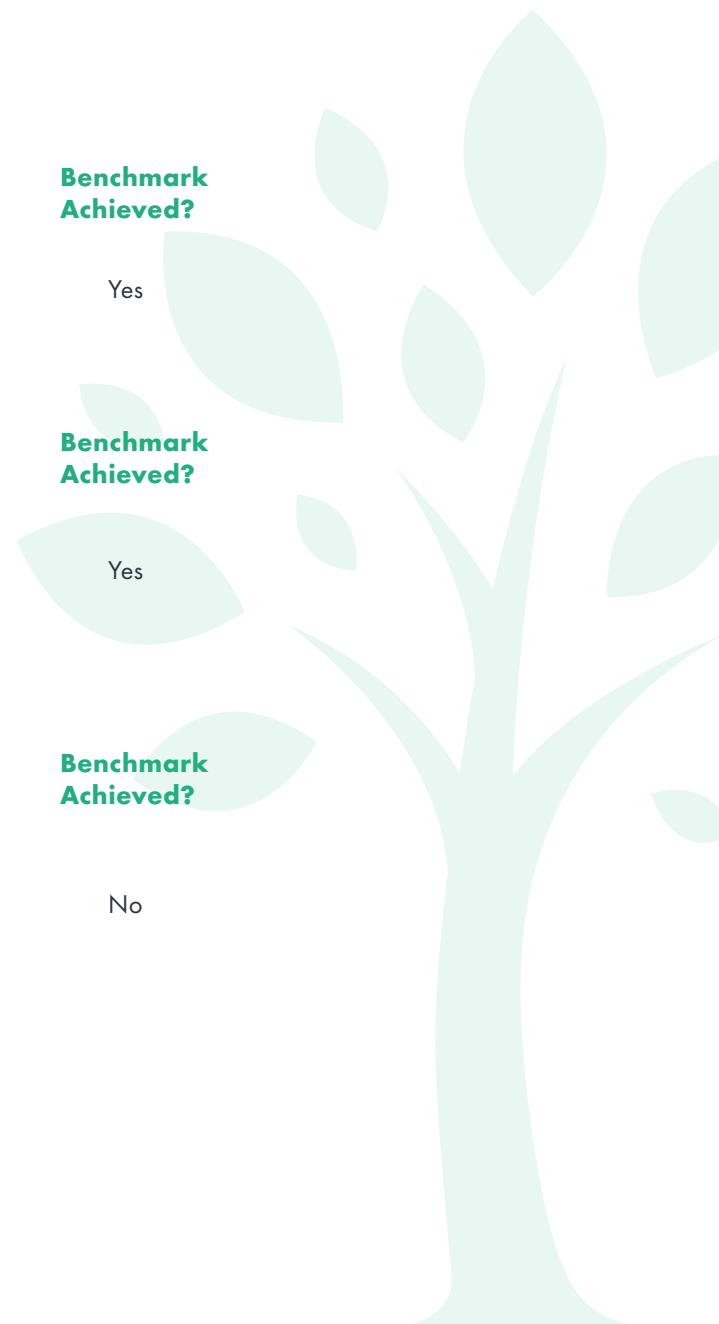
Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0%	0%	0%	Yes

SS #1: Increase in Household Income

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy (increase).	\$9,865	\$9,964	\$18,627	Yes

SS #2: Increase in Household Savings

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$15,777	\$15,935	\$3,339	No



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SS #3: Increase in Positive Outcomes in Employment Status

NOTE: Keene Housing uses participant provided third-party verification to determine employment status.

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Number of Head of Households that are:				
(1) Employed Full-time	5	7	7	Yes
(2) Employed Part-time	3	2	0	Yes
(3) Enrolled in an Educational Program	0	1	0	No
(4) Enrolled in a Job Training Program	1	1	0	No
(5) Unemployed	2	0	1	No
(6) Other	0	0	9	No
Percentage of total Work-able Households that are:				
(1) Employed Full-time	45%	64%	41%	N/A
(2) Employed Part-time	27%	18%	0%	N/A
(3) Enrolled in an Educational Program	0%	9%	0%	N/A
(4) Enrolled in a Job Training Program	10%	9%	0%	N/A
(5) Unemployed	18%	0%	<1%	N/A
(6) Other	0%	0%	53%	N/A



Approved MTW Activities

SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	1	0	1	No

SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline* 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase).	0	2	0	No

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

Challenges to Achieving Benchmarks

Keene Housing does not collect asset information from households with assets less than \$50,000.

The households affected by this activity experienced their second triennial recertifications in 2021. There were no significant changes to this activity.



Approved MTW Activities

2015.02.CE AFFORDABLE HOUSING PRESERVATION PROGRAM – ALTERNATIVE INSPECTION SCHEDULE

Plan Year Approved: 2015 Year Implemented: 2015

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

- All units converting to AHPP are inspected by the administering agency for HQS compliance no more than 90 days before initial conversion.
- If all units pass initial inspection, the property is subject to biennial HQS inspections of 20% of total units.
- Should any unit fail initial or any other inspection, the property is subject to an annual inspection of 100% of units until all pass HQS inspection, at which time the property returns to a 20% biennial inspection schedule.
- Properties subject to a higher inspection protocol than HQS may use that protocol in lieu of a biennial (not initial) HQS inspection.
- Properties that fail an inspection based upon a higher standard protocol are subject to an annual HQS inspection of all (100%) units until all units pass HQS or a higher inspection protocol.
- A household may, at any time, request a HQS inspection from the administering agency should the tenant believe that their unit does not meet HQS.



Approved MTW Activities

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$374	\$83	\$80	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	18	4	4	Yes

CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0%	0%	0%	Yes

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.

2015.03.CE EARNED INCOME DISREGARD (EID) ELIMINATION

Plan Year Approved: 2015 Year Implemented: 2015

KH discontinued allowing new households to claim the Earned Income Disregard (EID) from the calculation of tenant rent. All households claiming EID as of January 1, 2015 were permitted to do so until the natural end of their EID allowance, as required by regulation. ~~As of the end of 2016,~~ No participants received an EID allowance after December 31, 2016.



Approved MTW Activities

Hardship Requests and Outcomes

KH received no Safety Net applications in 2021 related to this activity.

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$576	\$0	\$0	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	24	0	0	Yes

CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	0%	0%	0%	Yes

CE #5: Increase in Agency Rental Revenue

Unit of Measure	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	\$225,078	\$239,310	\$153,276	No

Challenges to Achieving Benchmarks

Fewer households would have qualified for the EID elimination, resulting in a decrease in rental revenue. No changes were made to the metrics and data collection. There were no significant changes to this activity.



Approved MTW Activities

2016.01.CE PROJECT-BASED UNIT AGENCY CONDUCTED INSPECTIONS

Plan Year Approved: 2016 Year Implemented: 2016

Section 8(o)(11) of the 1937 Housing Act and 24 CFR 983.103(f)(1) requires PHAs to contract with a third party inspector for PHA owned PBV units. However, repeated attempts to locate a third party inspector for our owned and managed PBV units have been unsuccessful. The Project-Based Unit Agency Conducted Inspections activity permits KH to waive the third party inspection requirement until such time that an independent inspector can be found.

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

The activity only affects KH's former public housing portfolio as all other KH owned PBV units are inspected at a higher standard by an outside regulatory agency. There is no anticipated impact on KH or residents due to this activity as it makes no change to current practice.

With HUD's approval of KH's FY2019 MTW Plan, HUD acknowledged that Keene Housing's Moving to Work Agreement C D. 1.f. and D.7.A, gives KH the authority to inspect all KH and KH affiliate owned PBV units. Keene Housing will propose to close-out this activity in its FY2021 MTW Plan. All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.



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Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$10,279	\$10,279	\$4,159	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	481	481	212	Yes

CE #3: Decrease in Error Rate of Task Execution

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

Challenges to Achieving Benchmarks

All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.



Approved MTW Activities

2017.01.HC PBV MOBILITY WAIT LIST

Plan Year Approved: 2017 Year Implemented: 2014

Under HUD regulation 24 CFR 983.260 – Family Right to Move, when issuing tenant-based vouchers PHAs are required to provide them first to project-based voucher (PBV) households who requests one and has fulfilled at least one year of tenancy. However low turnover rates in our tenant based voucher program means that PBV residents are generally eligible for a tenant-based voucher as soon as one becomes available. Under the current regulation each voucher we issued would then go to a household already receiving housing assistance rather than one from our wait list, essentially making residency in a PBV a “requirement” to access a tenant-based voucher.

Keene Housing values housing choice, however we also recognize the need to assist otherwise eligible, unassisted households, who have often waited years for assistance. To balance these two priorities, Keene Housing increased the tenancy requirement for PBV households from one to two years. In addition, we established a ratio whereby every sixth tenant-based voucher issued goes to an eligible PBV household that requests a tenant-based voucher by opting in to our Mobility wait list.

The policies ensure equitable access to housing by households waiting for assistance as well as by assisted households looking to move to the private market. This activity meets the Housing Choice statutory objective and increases the number of units available to all low-income households by ensuring that availability of PBV units are not a barrier to those needing assistance. The activity also reduces wait times by ensuring that those on the wait list are assisted before those already being assisted.

For administrative purposes, all PBV households who applied for our tenant-based wait list prior to the implementation of this policy were automatically moved to the Mobility Wait List in the order of their original application. At lease-up, all PBV households are informed of their right to a tenant-based voucher after two-years of tenancy and given the choice to opt-in to our Mobility Wait List. PBV households may request to be placed on the Mobility wait list at any time.

PBV households are still eligible for transfers within the KH PBV portfolio during the PBV Mobility Wait List tenancy requirements if such a transfer is approved by the PBV owner. In addition, KH waives the PBV Mobility Wait List requirements for PBV households that meet the eligibility criteria for a tenant-based voucher under KH’s Violence Against Women Act (VAWA), Reasonable Accommodation, or Government Displacement/ Natural Disaster Preference policies.

Benchmarks and Outcomes

The following is a list of the metrics KH tracks using HUD’s established criteria. As is too often the case, many of the metrics that HUD required us to track are irrelevant to the activity’s design or intended outcomes.



Approved MTW Activities

The metrics marked with a (!) are those that HUD requires us to measure, despite the metrics' inappropriateness or irrelevance. Baselines and benchmarks for most of these metrics are set to zero because they cannot be measured. KH, like HUD, is committed to measuring MTW activities' efficacy, and we look forward to working with the MTW Collaborative and the Department to improve the 50900 so that it becomes a more useful tool for tracking and evaluating MTW activities.

CE#1: Agency Cost Savings †

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Cost in task dollars (decrease).	0	0	0	Yes

CE#2: Staff Time Savings †

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total Time to complete task in staff hours (decrease).	0	0	0	Yes

HC #3: Decrease in Wait List Time

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	84	36	66	No

Challenges to Achieving Benchmarks

With the award of additional 2017 Mainstream Vouchers in 2020 came a requirement by HUD that PHAs merge their Mainstream and Housing Choice Voucher (HCV) (982.204(f)) waiting lists and that Mainstream applicants receive a waiting list preference over HCV applicants. While this requirement may have seemed innocuous enough when it was drafted, consolidating the the Mainstream waitlist with the Housing Choice Voucher waitlist and providing a preference to Mainstream applicants has had the unintended consequence of grinding our HCV issuances to a halt. Generally, Mainstream vouchers are more difficult and resource intensive to issue and successfully lease. Additionally, we find that the attrition rate in the Mainstream program is much higher than the HCV - or Non-Elderly Disabled - program. Taken together, the consequence of the HUD required waiting list consolidation is that we are unable to get beyond Mainstream applicants on our waitlist, leaving non-Mainstream eligible households sitting on the voucher waitlist with no real prospect of being offered a voucher in the foreseeable future. While we are thrilled to be able to offer housing



Approved MTW Activities

assistance to the extremely vulnerable households the Mainstream program is designed to serve, we are troubled that the waittimes for households waiting for a Non-Elderly Disabled voucher or an HCV – including those on the PBV Mobility Waitlist – are growing at alarming rates. We plan to explore an MTW remedy to this ongoing, and disconcerting, problem. There were no significant changes to this activity. No changes to metrics or data collection.

2020.02.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS RENT REFORM

Plan Year Approved: 2020

The proposed Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) rent reform activity provides a streamlined methodology for calculating rent while providing households an opportunity to increase earnings and assets without being discouraged by corresponding increases in rent.

By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Participants pay 20% of gross income towards rent for the duration of participation in the FYI-TPV program.
- Interim recertifications are limited to household composition changes and cases where the total household income permanently drops by \$50 per month or more, with access to Safety Net for short term financial hardship.
- Households total net value of \$50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated (see activity 2015.03.CE Earned Income Disregard Discontinuance).
- Utilization of the Enterprise Income Verification system annually to determine continued eligibility of FYI-TPV participants.

Pursuant to Notice PIH 2019-20 (HA), issued July 26, 2019, and authorization from the Department of Housing and Urban Development's Foster Youth to Independence Team, MTW agencies may administer the FYI-TPV Program per their MTW Agreement as long as it is not inconsistent with Appropriations Act requirements (including the Authorizing Statute (section 8(x) of the United States Housing Act of 1937)), or the requirements of the Notice PIH 2019-20.

The activity was implemented upon HUD's approval of the Amended FY2020 MTW Plan.

Metrics

The following is a list of the metrics KH will track using HUD's established criteria.



Approved MTW Activities

Benchmarks and Outcomes

SS#1

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Unknown	Unknown	\$11,190	Yes

SS#3:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Employed full-time	0	2	2	Yes
Employed part-time	0	2	0	No
Enrolled in an educational program	0	1	1	Yes
Enrolled in job training program	0	1	0	No
Unemployed	0	0	1	No
Other	0	0	1	No

CE#1:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$608	\$200	\$0	Yes

CE#2:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease)	18.27	8.25	0	Yes



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CE#5:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total Household contributions towards housing assistance (increase)	\$0	\$1,879	\$5,520	Yes

Challenges to Achieving Benchmarks

All benchmarks achieved. All three (3) assisted households were work-able. There were no significant changes to this activity. No changes made to data collection or metrics.

2020.03.CE 2017 MAINSTREAM RENT REFORM

Plan Year Approved: 2020

The proposed 2017 Mainstream (2017 MS) Rent Reform activity provides a streamlined rent calculation methodology for households with 90% or more of their income coming from fixed sources. By simplifying the rent calculation process, the activity reduces KH’s administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Initial year of assistance verification 90% of income is from fixed income sources.
- Years two (2) and three (3) households self-certify fixed income sources have not changed.
- Years two (2) and three (3), Cost of Living Adjustment (COLA) recertifications (see 2005.01.CE Elderly and Disabled Household Alternative Recertification activity).
- Interim recertification for fixed income changes in years two (2) or three (3) to determine continued eligibility for the streamlined recertification process.
- Annual recertifications required if the 90% from fixed sources threshold isn’t met until such time as household income returns to 90% from fixed sources.
- Medical deduction threshold 7.5%. Pursuant to Notice PIH 2019

This activity’s rent determination and recertification rules will only be applied to new lease-ups upon HUD approval of the Amended FY 2020 MTW Plan.



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Metrics

The following is a list of the metrics KH will track using HUD's established criteria.

Benchmarks and Outcomes

CE #1:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$346	\$51	\$360	No

CE #2:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	14.25	3	16	No

CE #5

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Total Household Contribution towards housing assistance (increase).	\$0	\$91,228	\$3,943	No

Challenges to Achieving Benchmarks

Housing related issues included COVID-19 pandemic, increasing rents, low vacancy, and housing stock shortage resulted in lower than expected lease-ups. There were no significant changes to this activity. No changes were made to the metrics and data collection.

2020.01.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS DEVELOPMENT GRANTS

Plan Year Approved: 2020

Learning from the success of the Development Grant and Rent Credit program (see 1999.05.SS Resident Self Reliance Program), KH makes



Approved MTW Activities

Development Grants (DG) available to Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) participants to help mitigate some of the financial barriers that may impede their self-sufficiency goals. These financial barriers may include transportation, tuition, textbooks, exams, childcare and employer required uniforms or special equipment.

KH will maintains a Development Grant (DG) application and schedule of allowable expenses to ensure that DGs are used to further participants' long-term self-sufficiency goals. DG payments are made directly to the vendor providing goods or services to the participant, rather than directly to the participant. FYI-TPV participants are not required to participate in the Resident Self-Reliance Program.

Metrics

The following is a list of the metrics KH will track using HUD's established criteria.

Benchmarks and Outcomes

SS#1:

Unit of Measurement	Baseline 2020	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Not available	Not available	\$0	Yes
Keene Housing Metrics	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Households that received Development Grants.	0	2	0	No
Total Development Grant Funds Distributed.	\$0	\$1,000	\$0	No

Challenges to Achieving Benchmarks

No households requested development grants in 2021. There were no significant changes to this activity. No changes to metrics or data collection.



Approved MTW Activities

2017.02.HC LOCAL PAYMENT STANDARD

Plan Year Approved: 2017

Like many areas across the country, the Monadnock Region faces low rental vacancy rates and an aging housing stock. These market conditions create a premium for high quality affordable units located close to community resources, like jobs, schools and bus routes. In this environment, owners and developers of multifamily rental units are leasing units at levels significantly higher than HUD's Fair Market Rents (FMRs).

Our inability to, when necessary, establish payment standards in excess of 110% of HUD's FMRs hinders our capacity to increase housing opportunities for those we serve in two ways. First, the 110% payment standard ceiling is making it difficult for some voucher holders to find quality units in neighborhoods close to the resources they need, like jobs, medical providers, shopping and schools. Second, the payment standard ceiling prevents us from providing competitive rents in our Project Based Voucher program, thereby reducing the feasibility of future affordable housing development in the region's most desirable neighborhoods, and impacting the long-term viability of existing affordable housing developments that rely on Project Based Voucher rents keeping pace with the local market to meet their increasing operating expenses.

To remedy these disadvantages, KH will use this activity to set its own Local Payment Standards based on actual market data, rather than HUD's FMRs, using the same Rent Comparability Study methodology used for our HUD Multifamily properties. The Local Payment Standard activity increases the mandated Payment Standard cap to 175% of FMR, waives the requirement to utilize HUD's FMRs when determining the agency's Payment Standards, and allows KH to self-approve rents exceeding its Board-approved VPS, when necessary.

Benchmarks and Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (increase).	\$0	\$0	\$0	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Total Time to complete the task in staff hours (decrease).	0	0	0	Yes



Approved MTW Activities

Keene Housing Local Metric(s)

Local #1: Additional units of Housing Made Available

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	24	24	Yes

Local #2: Increase in Resident Mobility

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of household able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	24	0	No

Activities on Hold

Keene Housing has no activities on hold.

Not Yet Implemented Activities

Keene Housing has implemented all its MTW Activities.

Closed Out Activities

1999.02.CE HOUSING QUALITY STANDARDS (HQS) LANDLORD SELF-CERTIFICATION INSPECTION PROTOCOL

Plan Year Approved: 2000 Year Implemented: 2000

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

No Housing Quality Standards inspections were conducted by landlords in 2021.



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CE #1: Agency Cost Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$11,854	\$9,048	\$6,533	Yes

CE #2: Staff Time Savings

Unit of Measurement	Baseline 2010	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	545	416	250	Yes

Keene Housing Local Metric(s)

In addition to the required metric(s) developed by HUD, KH also utilizes the following local metric(s) to monitor program efficacy.

KH: Self-Certification Inspections

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of inspections by landlords (increase).	0	5	0	No

KH: HQS Quality Control

Unit of Measurement	Baseline 2013	Benchmark	Outcome	Benchmark Achieved?
Number of self-certified units failing HQS Quality Control inspection (decrease).	0	0	0	Yes

Challenges to Achieving Benchmarks

This activity closed out with HUD’s approval of KH’s FY2021 MTW Plan. There were no significant changes to this activity. No changes to metrics or data collection.



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2006.01.CE STANDARD DEDUCTIONS

Year Implemented: 2012 Year Closed: 2013

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

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

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

2016.01.CE PROJECT-BASED UNIT AGENCY CONDUCTED INSPECTIONS

Plan Year Approved: 2016 Year Implemented: 2016

Section 8(o)(11) of the 1937 Housing Act and 24 CFR 983.103(f)(1) requires PHAs to contract with a third party inspector for PHA owned PBV units. However, repeated attempts to locate a third party inspector for our owned and managed PBV units have been unsuccessful. The Project-Based Unit Agency Conducted Inspections activity permits KH to waive the third party inspection requirement until such time that an independent inspector can be found.

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

The activity only affects KH's former public housing portfolio as all other KH owned PBV units are inspected at a higher standard by an outside regulatory agency. There is no anticipated impact on KH or residents due to this activity as it makes no change to current practice.



Approved MTW Activities

With HUDs approval of KHs FY2019 MTW Plan, HUD acknowledged that Keene Housing’s Moving to Work Agreement C D. 1.f. and D.7.A, gives KH the authority to inspect all KH and KH affiliate owned PBV units. Keene Housing will propose to close-out this activity in its FY2021 MTW Plan. All benchmarks were achieved. No changes were made to the metrics and data collection. There were no significant changes to this activity.

2011.01.CE HOUSING QUALITY STANDARDS (HQS) BIENNIAL INSPECTION SCHEDULE

Plan Year Approved: 2011 Year Implemented: 2011 Year Closed: 2017

In 2011 KH transitioned from the annual Housing Quality Standards (HQS) inspections to biennial HQS inspections, including KH-owned and managed properties. KH still conducts an initial inspection of all newly leased units. Any property with a unit that fails an initial, special, quality control, or biennial inspection is held to an annual inspection schedule until such time that all units pass an annual inspection.

Due to changes in 24 CFR982.405 which now permit all public housing authorities to utilize a biennial inspection schedule, KH closed out this activity in FY2017.

Outcomes

MTW Report Year	Outcomes
2011	Activity Proposal
2012	694 inspections; 524 placed on biennial inspection cycle; 170 annual cycle; 3 units failing HQS QC. Landlords conducted 42 annual inspections in 2012.



Approved MTW Activities

MTW Report Year

2013

Outcomes

KH reworked the number of inspections conducted annually by staff to follow HUDs new standard metrics and reported under the agency cost savings and staff time savings metrics.

CE #1: Agency Cost Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$7,251	\$5,976	Yes

CE #2: Staff Time Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Time to complete the task in staff hours (decrease).	416	288	Yes

CE #3 : Decrease in Error Rate of Task Execution

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

Keene Housing Local Metric(s)

KH: Self-Certification Inspections

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Number of inspections by landlords (increase).	5	0	No



MTW Report Year

2014

Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$9,048	\$3,258	Yes

CE #2: Staff Time Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Time to complete the task in staff hours (decrease).	416	157	Yes

CE #3 : Decrease in Error Rate of Task Execution

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



MTW Report Year

2015

Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$9,048	\$3,258	Yes

CE #2: Staff Time Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Time to complete the task in staff hours (decrease).	416	157	Yes

CE #3 : Decrease in Error Rate of Task Execution

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



Approved MTW Activities

MTW Report Year

2016

Outcomes

CE #1: Agency Cost Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$9,048	\$10,166	Yes

CE #2: Staff Time Savings

Unit of Measurement	Benchmark	Outcome	Benchmark Achieved?
Time to complete the task in staff hours (decrease).	416	166	Yes

CE #3 : Decrease in Error Rate of Task Execution

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

2017

Closed out activity

Keene Housing administered the Housing Quality Standards Biennial Inspection Schedule activity for 5 years. The outcomes achieved were as we expected. KH was pleased to see our successful MTW initiative become available to all PHAs with HUD's changes to 24 CFR 982.405, which permits all housing authorities to implement biennial inspection schedules.



2016.02.HC PROJECT MARCH (MONADNOCK AREA RESOURCES CURING HOMELESSNESS)

Plan Year Approved: 2016 Year Implemented: 2016 Year Closed: 2019

Project MARCH utilizes a Housing First model that provides partner agencies fixed subsidies to secure and maintain private market housing for their homeless clients. KH partnered with Southwestern Community Services (SCS), the region's Community Action Agency and our largest THASP partner. KH pledged up to twenty (20) Project MARCH subsidies to SCS for 2016. This commitment expands affordable housing options in the community and provides options beyond the shelters for those who may otherwise find it difficult to secure permanent, affordable housing.

Project MARCH outreach focuses on the region's homeless veteran population, and veterans receive a preference for Project MARCH subsidies throughout the program's life, or until every homeless vet in the Monadnock Region who wants to have housing, does. Every household who receives housing through Project MARCH is also offered two months of intensive supportive services from SCS. SCS continues working with households who request additional assistance after two months.

The Project MARCH partner is responsible for creating and enforcing eligibility and continued occupancy policies. Such policies must, at minimum, meet the following requirements:

- Ensure that no policies or procedures violate any federal, state, or local regulation or statute.
- Certify that no Project MARCH participant has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- Require that at least one member of the participating household has established citizenship or eligible immigration status.
- Confirm that all units leased through Project MARCH are meet Housing Quality Standards (HQS) protocols and are subject to KH's HQS quality control protocols.
- Establish that a Project MARCH participant's rent burden cannot exceed 45% of monthly income.
- Certify that no Project MARCH participant's annual income will exceed 80% Area Median Income (AMI) at eligibility.
- Verify that the partner will not impose a time limit for participation but will require Project MARCH participants to apply for housing assistance with KH.



Benchmarks and Outcomes

The following is a list of the metrics KH tracks using HUD's established criteria. As is often the case since the adoption of the most recent 50900, many of the metrics that HUD demands that we track are irrelevant to Project MARCH's design or intended outcomes. In fact, several of the metrics we are required to track, because they measure things that Project MARCH is not designed to affect, give the appearance that Project MARCH is not working; HC #3 Decrease in Wait List Time, SS#6 Reducing per Unit Subsidy Costs for Participating Households and SS #7 Increase in Agency Rental Revenue are the most egregious examples of this.

The metrics marked with a (!) are those that HUD requires us to measure, despite the metrics' inappropriateness and irrelevance. Baselines and benchmarks for most of these metrics are set to zero because they cannot be measured. KH, like HUD, is committed to measuring MTW initiatives' efficacy, and we look forward to working with the Department to improve the 50900 so that it becomes a more useful tool for tracking and evaluating MTW activities.

2013.01.CE HOUSING QUALITY STANDARDS (HQS) ALTERNATIVE INSPECTION PROTOCOL

Plan Year Approved: 2013

Year Closed: 2017

In 2013 Keene Housing discontinued inspecting units held to a stricter inspection protocol than HQS – REAC/UPCS, State Finance Authority, etc. If a property is inspected under a stricter inspection protocol than HQS, and the property receives a “pass” score, KH relies on that inspection to demonstrate compliance with the property's biennial HQS inspection requirement.

Due to changes in 24 CFR982.405 which now permit all public housing authorities to utilize a biennial inspection schedule, KH closed out this activity in FY2017.



Outcomes

MTW Report Year

2016

Outcomes

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$8,460	\$846	No

HC #1: Additional Housing Units Made Available

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	20	2	No
Households served: Homeless				

HC #3: Decrease in Wait List Time

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average income of households affected by this policy in dollars (increase)	0	0	0	Yes



Approved MTW Activities

MTW Report Year

2016

Outcomes

HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	0	20	2	No

HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	0	20	2	No

SS #1: Increase in Household Income

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	\$0	\$0	\$0	Yes

SS #2: Increase in Household Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average savings/escrow of households affected by this policy (increase)	\$0	\$0	\$0	Yes



MTW Report Year

2016

Outcomes**SS #3: Increase in Positive Outcomes in Employment Status****The number of households:**

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	0	0	0	Yes
Enrolled in Educational Program	0	0	0	Yes
Enrolled in Job Training Program	0	0	0	Yes
Unemployed	0	0	0	Yes
Other	0	0	0	Yes

The percentage of work-able households:

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	0%	0%	0%	Yes
Employed Part-Time	0%	0%	0%	Yes
Enrolled in Educational Program	0%	0%	0%	Yes
Enrolled in Job Training Program	0%	0%	0%	Yes
Unemployed	0%	0%	0%	Yes
Other	0%	0%	0%	Yes

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of household receiving services aimed to increase self-sufficiency (increase)	0	20	2	No



MTW Report Year

2016

Outcomes**SS #6: Reducing Per Unit Subsidy Costs for Participating Households**

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per households affected by this policy in dollars (decrease)	\$0	\$0	\$0	Yes

SS #7: Increase in Agency Rental Revenue

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase)	\$0	\$0	\$0	Yes

SS #8: Households Transitioned Into Self-Sufficiency

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of Households Transitioned Into Self-Sufficiency	0	0	0	0



MTW Report Year

2017

Outcomes

CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$8,460	\$1,808	No

HC #1: Additional Housing Units Made Available

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	20	6	No
Households served: Homeless				



MTW Report Year Outcomes

2018

SS #1: Increase in Household Income

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase)	\$0	\$0	\$0	Yes

SS #2: Increase in Household Savings

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average savings/escrow of households affected by this policy (increase)	\$0	\$0	\$0	Yes

SS #3: Increase in Positive Outcomes in Employment Status

The number of households:

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	0	0	0	Yes
Employed Part-Time	0	0	0	Yes
Enrolled in Educational Program	0	0	0	Yes
Enrolled in Job Training Program	0	0	0	Yes
Unemployed	0	0	0	Yes
Other	0	0	0	Yes



MTW Report Year Outcomes

2018

The percentage of work-able households:

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Employed Full-Time	0%	0%	0%	Yes
Employed Part-Time	0%	0%	0%	Yes
Enrolled in Educational Program	0%	0%	0%	Yes
Enrolled in Job Training Program	0%	0%	0%	Yes
Unemployed	0%	0%	0%	Yes
Other	0%	0%	0%	Yes

SS #5: Households Assisted by Services that Increase Self-Sufficiency

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase)	0	20	6	No

SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per households affected by this policy in dollars (decrease)	\$0	\$0	\$0	Yes

SS #7: Increase in Agency Rental Revenue

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase)	\$0	\$0	\$0	Yes

SS #8: Households Transitioned Into Self-Sufficiency

Unit of Measurement	Baseline 2015	Benchmark	Outcome	Benchmark Achieved?
Number of Households Transitioned Into Self-Sufficiency	0	0	0	0



Section V.

Sources and Uses of Funding

Sources and Uses of MTW Funds

Actual Sources and Uses of MTW Funding for the Fiscal Year.

Sources and uses submitted in FDS format through the Financial Assessment System – PHA.

Activities that Used Only MTW Single Fund Flexibility

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

Local Asset Management Plan

Is the PHA allocating costs within statute? YES

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

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

Has the PHA provided a LAMP in the appendix? NO

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



Section VI.

Administrative

Agency Review

Keene Housing was not subject to any HUD reviews, audits, or physical inspection issues which required agency action.

PHA-Directed Evaluations of MTW

Keene Housing did not engage in any PHA-directed evaluations of the demonstration in 2021.

Certification of Compliance

See following page.



**2021 Moving to Work Annual Report
Certification of Meeting Statutory Requirements**

RESOLVED, March 17, 2022 that Keene Housing Board of Commissioners approves the FY 2021 Moving to Work Annual Report. The Board certifies that Keene Housing has met the three statutory requirements of the Moving to Work program in 2021:

1. At least 75% of the families assisted by KH are very low-income families. Includes THASP.

HOUSEHOLDS SERVED AS OF 12/31/2021		578
Number of households with incomes below 50% Area Median Income	479	
Percent of households with income below 50% Area Median Income	83%	

2. KH continues to assist substantially the same total number of eligible low-income households as would have been served had the amounts not been combined. Includes THASP.

TOTAL FAMILIES SERVED IN Baseline Year (1999) 585
TOTAL FAMILIES SERVED IN FY 2021 578

3. KH maintains a comparable mix of households served (by household size) as would have been provided had the amounts not been used under the demonstration. Excludes THASP.

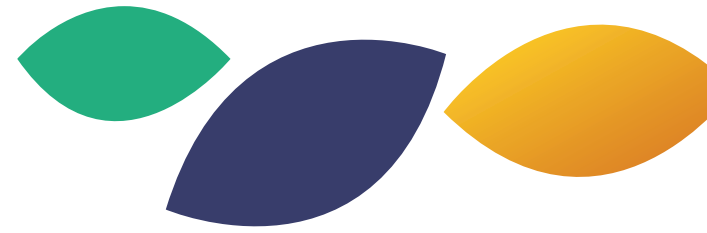
Number of Households Served by Family Size this Fiscal Year	1	2	3	4	5	6+	Totals
	Person	Person	Person	Person	Person	Person	Person
	303	85	64	30	20	11	513

PHA Name: Keene Housing Number/HA Code: NH010

Adopted:  _____ Date: March 24, 2022
 Chris Coates, Chairperson

Appendix I.

Keene Housing Strategic Plan



2020-2025



STRATEGIC PLAN

“Progress is not in enhancing what is, but in advancing toward what will be.”

Khalil Gibran

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INTRODUCTION

This Strategic Plan provides Keene Housing's Board of Commissioners, our staff, the people we serve, and our partners – local, regional and national – with a road map that identifies the strategic goals Keene Housing will strive to achieve by 2025. This plan was developed with active engagement and feedback from our Board of Commissioners, staff, residents, voucher holders, landlords, and community partners from as nearby as City Hall and as far away as Washington, DC.

This strategic plan finds us at a very different place organizationally than we were at when the last strategic plan was developed, in 2015. In 2015 much of Keene Housing's senior staff and several Board Commissioners were relatively new to the organization, having only worked together for a few years. We were in the early stages of developing a strategy for addressing the portfolio's long-term capital needs, and we were just beginning to understand the portfolio's energy costs and opportunities for savings. Similarly, in 2015 we started to think differently about how we could better help the young people we house become successful adults, and about what more we could do to help the elderly and disabled neighbors we serve live healthier, happier, more independent lives.

By early 2019, when work on this Strategic Plan began, we were encouraged that we'd achieved many of the goals we'd set for ourselves in 2015. We'd spent the last five years aggressively addressing the portfolio's most pressing capital needs, including a massive rehabilitation project at Central Square Terrace, our 90-unit historic building in the heart of downtown Keene. Our understanding of the portfolio's energy performance and strategies for improvements had also come into focus. By 2019 we'd made significant strides towards decreasing our energy needs and had already made great progress towards reaching our goal of relying 100% on renewable energy by 2035.

Since providing it with seed funding in December 2014, the Keene Housing Kids Collaborative (KHKC) has grown from a small start-up nonprofit serving a few children, to one of the city's most recognized service organizations, serving hundreds of Keene Housing kids each year. We are also pleased that goals related to our elderly and disabled residents' quality of life were largely achieved, in great part due to the addition of a dedicated Elderly/Disabled Resident Service Coordinator in 2016. Thanks to her hard work, our elderly and disabled residents had many more opportunities to participate in activities that helped maintain their mental and physical health, social connections and sense of belonging. Similarly, our Community Garden program took off with over 35 dedicated Community Gardeners maintaining over 60 raised beds across our real estate portfolio.

Even with all of these accomplishments, there is still much work to be done, and this Strategic Plan is the guide we will use to identify and track our progress over the coming five years.



A ROADMAP TO 2025

As was the case with our previous five-year strategic plan, this plan is organized by goal, with each goal broken down into a series of related objectives and projects that will help ensure that we stay grounded and focused on our way to 2025. We will also continue the practice of reviewing and when needed, revising, the Strategic Plan each year.

These annual reviews give the Board of Commissioners and staff opportunities to check on our progress towards the goals, objectives and projects articulated in this plan. These check-ins also give us opportunities to make revisions when circumstances “on the ground” change. If it is to be a useful tool, the strategic plan must be a living document; we must be able to adjust and revise it in response to emerging opportunities and threats.

As we look ahead to 2025, we are excited by what is to come. We look forward to completing the portfolio’s remaining rehabilitation projects and turning our attention to creating new affordable housing for our neighbors who need it. We look forward to continuing to be leaders in the areas of energy efficiency and solar energy production. We are excited to find new ways to support the health and well-being of our frailest residents and helping our working families achieve greater economic independence. And, as always, we are grateful that, thanks to our designation as a U.S. Department of Housing and Urban Development Moving to Work (MTW) Agency, we have the flexibility to respond to emerging opportunities and threats in ways that most other Public Housing Authorities cannot. Much of what we have accomplished, and what we hope to achieve in the years ahead is largely possible because of our MTW designation.

Finally, we look forward to working with all of our partners; as we try to meet our shared challenges over the next five years. This Strategic Plan is being printed at a time when business leaders, politicians and policy makers of all political and philosophical stripes are beginning to recognize the effect the affordable housing shortage is having on our communities’ social, physical and economic health. While we wish it didn’t take as long as it has for the housing crisis to be recognized for what it is, we are grateful that from Keene to Concord to Washington, decision makers are starting to work on solutions. We look forward to doing our part to help.



MISSION STATEMENT

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



GOAL 1:

Preserve, Improve and Expand Affordable Housing Stock

KH's existing real estate portfolio is a critical component of the region's affordable housing stock. Maintaining and improving the portfolio for future generations is amongst KH's primary responsibilities. This goal captures a broad range of initiatives that help ensure the portfolio's long-term viability including capital improvements, landscaping and other activities to improve "curb appeal", preventive maintenance and, when appropriate, recapitalization.

We also recognize that our current portfolio will never be large enough to meet the growing demand for high quality affordable housing in the Monadhock region. Therefore, this goal also encompasses efforts to address broader regional affordable housing needs through a combination of preservation and development activities.

OBJECTIVES:

- Address the portfolio's capital needs
- Restructure/recapitalize portfolio financing where needed to ensure viability and long-term affordability
- Identify and secure new funding to support capital needs including continuing use of MTW funds
- Maintain exceptional "curb appeal"
- Leverage Project Based Vouchers and the Transitional Housing Assistance Subsidy Program as regional affordable housing preservation and expansion tools
- Pursue development opportunities that respond to identified, quantifiable regional housing needs

PRIORITY PROJECTS:

- Update annually and implement portfolio-wide preventive maintenance plan, with a focus on activities that reduce energy consumption
- Update annually and implement portfolio-wide landscape/grounds improvement and maintenance plan
- Implement annual and five-year Capital Plans with a focus on priority needs such as life safety improvements, energy efficiency and accessibility projects (including those that support "aging in place"), in a manner that keeps residents informed, and minimizes disruption to their lives
- Update Capital Needs Assessments on a five-year cycle
- Develop and implement plan for the rehabilitation of Bennett Block
- Develop and implement recapitalization strategy, and related capital improvements, for projects nearing the end of the Low-Income Housing Tax Credit initial compliance period including Stone Arch Village and Evergreen Knoll
- Develop a plan for the rehabilitation of 105 Castle Street, preserving its role as a community space for Harper Acres residents
- Identify and undertake at least one additional development project by 2025



GOAL 2:

Promote Energy Conservation and Sustainability

With the exception of personnel expenses, energy is Keene Housing's largest operating cost. Recognizing the overriding importance of reducing energy consumption and costs, KH is an active participant in the Better Buildings Challenge established by the US Departments of Energy and Housing and Urban Development. Focusing on reducing utility consumption and incorporating energy efficient, sustainable materials into capital projects is the focus of the Better Buildings Challenge and this Strategic Plan goal.

OBJECTIVES:

- Transition to 100% renewable energy sources by 2035
- Achieve Better Buildings Challenge goals by 2025
- Continue executing energy conservation and investment strategies to lower costs and reduce carbon footprint
- Integrate conservation and sustainability into modernization and development planning
- Continue accessing available energy efficiency rebate and incentive programs
- Stay informed about and take advantage of emerging public policies that incentivize energy efficiency and generation projects
- Promote KH's energy efficiency achievements to partners, stakeholders and the general public

PRIORITY PROJECTS:

- Implement Energy Strategic Plan in coordination with execution of Capital Plan
- Maintain and update Energy Strategic Plan
- Replace all Electric Thermal Storage (ETS) units with air source heat pumps or similar high efficiency HVAC system
- Develop and implement a water conservation plan for community gardens
- Continue monitoring utility consumption to inform choices and quantify savings from energy-related retrofits, improvements, and solar projects
- Inform and educate residents about energy conservation benefits at lease up and periodically during tenancy



GOAL 3:

Prudently Manage and Oversee Agency Finances

Scarce federal and state support for affordable housing severely constrains Keene Housing's ability to fully address capital, supportive service and other needs. Keene Housing must work diligently to maximize the resource leveraging impact of its available funds and seek new income sources, while simultaneously reducing operating costs by pursuing creative management and energy conservation strategies. KH's objectives in this area include diversifying funding sources, increasing non-federal financial reserves and containing operating costs.

OBJECTIVES:

- Strengthen and expand financial analysis and reporting capabilities
- Contain and, whenever possible, reduce operating costs
- Expand and diversify funding sources to reduce reliance on HUD and USDA
- Increase non-federal operating reserves
- Maximize rent and management fee potential
- Minimize vacancy loss across the portfolio
- Maximize occupancy and rent potential for commercial spaces

PRIORITY PROJECTS:

- Annually update and implement the agency-wide Financial Management Plan
- Explore opportunities for residents to contribute to curb appeal
- Conduct annual review of rent and management fees
- Continually monitor vacancy loss
- Regularly renew and update cost allocation methodology
- Conduct annual review of benefits and health insurance costs, pursuing cost effective but equitable opportunities where feasible
- Conduct annual review of property and casualty insurance costs, pursuing cost effective opportunities whenever feasible
- Identify and secure additional revenue through grants, increased management fees, and other initiatives
- Where permissible, repurpose and identify new revenue opportunities for underutilized community rooms in consultation with residents



GOAL 4:

Achieve Excellence in Management

Providing high quality property management and maintenance services to all residents is a core value that is deeply ingrained into Keene Housing's organizational culture. This strategic goal focuses on achieving industry-leading performance outcomes in key performance indicators including occupancy, vacancy, unit turnaround time, rent collection and work order completion. In achieving its occupancy goals, KH is committed to fair and consistent lease enforcement, and to working closely with residents to minimize the need for evictions.

OBJECTIVES:

- Maximize utilization of available voucher and housing resources
- Meet or exceed performance goals related to voucher utilization, property management and maintenance indicators
- Document, maintain, and implement best practices that meet or exceed applicable regulatory requirements
- Maximize operational efficiencies created by 2019 reorganization of voucher and property management functions

PRIORITY PROJECTS:

- Achieve annual voucher program utilization goals
- Achieve annual property management and maintenance goals
- Annually update and implement Tenant Selection and Occupancy Plan and MTW Administrative Plan
- Convert to a single enterprise software platform for voucher, property management and finance operations
- Identify areas of risk, develop and implement quality control protocols where needed
- Streamline and wherever possible consolidate housing and voucher administrative processes and systems to maximize efficiencies and improve operational outcomes
- Receive accreditation from the Affordable Housing Accreditation Board



GOAL 5:

Promote Wellness and Independence Among Seniors and Residents with Disabilities

Almost half of the households Keene Housing serves includes at least one member who is elderly or disabled. State and regional demographic data suggest that this trend will continue well into the future. This strategic goal recognizes this trend, and commits Keene Housing to facilitating aging in place, and to pursuing initiatives that enhance elderly and disabled residents' quality of life. Keene Housing will accomplish this goal by partnering with agencies that have the resources and expertise to help, and by integrating residents' physical needs into our capital planning process.

OBJECTIVES:

- Leverage resources to secure new funding and services
- Integrate accessibility features and resident comfort into new and retrofit project designs

PRIORITY PROJECTS:

- Explore opportunities for additional resident services through recurring federal and state sources including but not limited to Medicaid reimbursement
- Implement strategies to ensure successful housing search and long-term tenancies for disabled residents and voucher holders, including educating residents on reasonable accommodations
- Expand partnerships providing on-site quality of life programs and services



GOAL 6:

Support Resident Economic Development

As evidenced by our resident-centric approach to property management and robust resident services programming, helping residents and voucher holders seek well-paying jobs, improve their educations and increase their assets are important KH goals. This strategic goal takes full advantage of Keene Housing's MTW flexibility to develop rent reform and resident service initiatives specifically designed to help working families achieve greater economic independence.

OBJECTIVES:

- Use MTW flexibility to explore resident service and rent models that provide incentives for employment and asset building
- Leverage internal and external resources to help residents and voucher holders build social connections and sense of community
- Focus on measurable outcomes and program evaluation

PRIORITY PROJECTS:

- Develop, implement and evaluate rent reform and services demonstration project, with support from third party private or academic researchers
- Look for additional Transitional Housing Assistance Subsidy Program (THASP) partners
- Increase the use of the Family Activity Centers by local service providers and residents



GOAL 7:

Support Youth Development Through Collaboration with the Keene Housing Kids Collaborative

Keene Housing has been the driving force and primary financial supporter of the Keene Housing Kids Collaborative (KHKC), a non-profit organization established in 2014 to support the healthy development and educational success of KH youth. Working in collaboration with KH, the Keene School District and more than 30 partner agencies, KHKC is implementing an ambitious array of after school and summer programs that promote healthy youth development and support parents and children living in Keene Housing owned or assisted homes. During the Strategic Plan term, KH will support and collaborate with KHKC to increase its fund-raising capacity, and to help KHKC become a self-sustaining non-profit organization.

OBJECTIVES:

- Continue supporting and collaborating with KHKC to expand and strengthen programs that focus on youth development from preschool through high school
- Help KHKC become a self-sustaining organization

PRIORITY PROJECTS:

- Improve communications between KHKC and KH BOC
- Continue reducing MTW contribution towards KHKC operating costs
- Introduce KHKC leadership to additional potential affordable housing partners



GOAL 8:

Build Board and Staff Capacity and Skills

An engaged, well-trained Board and staff are essential for Keene Housing to continue achieving excellence, fostering innovation and most importantly, addressing community needs. This goal incorporates ongoing efforts to increase the Board of Commissioner's engagement in, and advocacy on behalf of KH's strategic goals. It also encompasses supporting and building Board and staff capacity through continuing education, and initiatives that periodically solicit feedback from staff and the Board, especially when major organizational transitions are under consideration.

OBJECTIVES:

- Recruit and retain a qualified, motivated workforce
- Provide staff with the training, including cross training, needed to excel at their jobs and grow within the organization
- Ensure that new and current Board members are fully informed of their roles and responsibilities, appropriately engaged in governance and policy matters, and fulfilling their obligation to advocate for KH and the households we serve
- Provide opportunities for local stakeholders, including students, to learn about KH's work

PRIORITY PROJECTS:

- Continue bonus program to recognize extraordinary performance
- Continue conducting employee satisfaction/feedback surveys
- Annually update Board training materials and schedule, including on-boarding packet, using the AHAB accreditation standards for Governance as a source for best practices
- Increase opportunities for Board members to participate in relevant trainings and to engage with KH staff
- Continue developing strategies that attract and retain quality staff at all organizational levels
- Implement intradepartmental cross training initiatives
- Implement interdepartmental "Shadow Days"



GOAL 9:

Enhance Customer Service and Operational Efficiency

Keene Housing is a service organization. Applicants, residents and voucher holders are our customers. KH is always focused on ways to streamline operations and improve customer service for applicants, residents and voucher holders. This strategic goal incorporates activities that leverage emerging technology, provide increasingly helpful and timely information to our customers and community, and minimize disruption to residents and operations in the event of a natural disaster or other unforeseen event.

OBJECTIVES:

- Integrate new technologies that streamline work processing and improves public/resident access to information
- Ensure that the providing high quality customer service, based in empathy and fairness, is a fundamental organizational principal
- Provide additional opportunities to easily receive and respond to public feedback
- Implement a disaster response and recovery plan

PRIORITY PROJECTS:

- Develop and implement a plan to improve the website
- Develop and implement a security plan
- Periodically assess and implement required enhancements to KH's hardware, software and telecommunications network
- Develop and implement a Communications Plan that uses technology to improve the timeliness, accuracy and accessibility of information about KH plans and strategies for applicants, residents, voucher holders, community stakeholders and other target audiences
- Regularly solicit input from residents and stakeholders on KH programs and initiatives
- Develop a disaster response plan that accounts for the safety of residents and staff as well as the need to recover quickly from a natural disaster
- Evaluate and, where cost effective, deploy technological tools such as video updates, kiosks, computers and publicly available printers to assist residents and applicants



GOAL 10:

Be a Strong and Effective Advocate for Innovation in Affordable Housing and Supportive Service Programs

Keene Housing's organizational culture values and actively supports innovation and excellence in the administration of housing and supportive service programs for low- and moderate-income people. KH strongly believes that we achieve excellence by learning from, and sharing with others engaged in activities that benefit our customers. To that end, KH strives to play a prominent role in local, state and federal efforts to improve, promote and expand affordable housing programs and supportive services. Central to this effort is KH's leadership in the Moving to Work (MTW) program.

OBJECTIVES:

- Support and participate in the growth of the MTW Collaborative and advocate for the permanent extension of current MTW Agreements
- Participate in local, state and national efforts to improve public policy affecting affordable housing development, management and administration
- Contribute to efforts to improve local, state and national renewable energy incentive programs and related public policies
- Contribute to efforts to improve local, state and national supportive service programs and policies

PRIORITY PROJECTS:

- Actively participate in and support the MTW Collaborative
- Actively participate in and support the Affordable Housing Accreditation Board
- Actively participate in and support the New Hampshire Housing Authority Corporation
- Actively participate in and support the Public Housing Authorities Directors Association
- Actively support the advocacy efforts of Housing Action New Hampshire
- Ensure that members of senior staff hold leadership positions with local, state and federal organizations, committees and councils
- Continue advocating for low- and moderate-income people to local, state and federally elected officials





Appendix II.

Rent Reform And Resident Sevices Random Control Study Data



KEENE HOUSING'S RENT REFORM 2021 DATA SUMMARY

*Produced for Keene Housing by the Public and Affordable Housing Corporation (PAHRC)
March 2022*

Introduction

Housing agencies operating under the Moving to Work (MTW) demonstration have implemented over 300 innovations to improve the administrative efficiency of operating HUD housing programs, increase housing choices for low-income people living in their communities, and provide opportunities and incentives for individuals participating in their programs to experience greater economic mobility. Keene Housing is among the original 39 MTW agencies piloting new programs to improve the effectiveness of housing subsidies. While some limited flexibilities in rent setting were provided to housing authorities in the Quality Housing and Work Responsibility Act (QHWRA) in 1998, MTW status allows Public Housing Authorities (PHAs) the most flexibility to implement changes in tenant rents and the recertification process. Other HUD programs that implement small adjustments to the traditional rental agreement to incentivize work and savings, JobsPlus and the Family Self Sufficiency (FSS) program, have also been shown to increase income and savings, though resident predisposition to success and the strength of the training tools offered to participants can predict their level of success¹. MTW initiatives that change rent-setting processes or rent subsidies to improve administrative efficiency and boost resident self-sufficiency have been implemented in some way by nearly all MTW agencies. Fourteen agencies, including Keene, have extended the recertification process and six agencies have incorporated flat rent subsidies with income bands². Most housing agencies that implement significant rent reforms pair these efforts with resident services that facilitate increases in employment.

Keene Housing has instituted two key rent reforms to increase administrative efficiency, reduce disincentives in rent structures, and help residents reach economic independence. The first is an alternative rent model composed of stepped rents in which non-disabled, non-elderly households pay 20% of their gross adjusted income for the first two years after entry. In the third year of program participation, participants receive 65% of the payment standard for which they are eligible and 45% of the payment standard for which they are eligible in year four and after. As part of the stepped rent subsidy program, Keene Housing requires working-age non-disabled adults participate in the Resident Self Reliance (RSR) program. The RSR program employs service coordinators to help residents set and meet goals through quarterly meetings and connect them to

¹ Bloom, H. et al. 2005. "Promoting Work in Public Housing: The Effectiveness of Jobs Plus" MDRC
Riccio, James. 2010. "Sustained Earnings Gains for Residents in a Public Housing Jobs Program" MDRC
HUD FSS Evaluation

² Abt Associates. 2014. Innovations in the Moving to Work Demonstration.

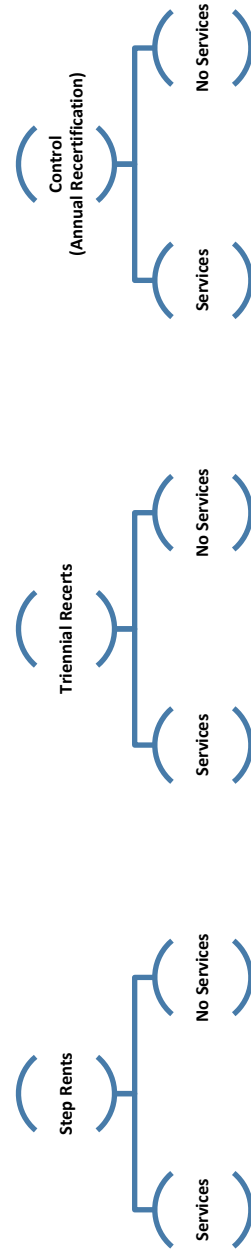
selected training opportunities and other services. It also includes development grants to help residents invest in their labor market skills and rent credits that serve as incentives for reaching goals.

While the stepped rent model was developed to encourage households to boost their earnings and incur rent savings, Keene Housing's second rent reform, the triennial recertification model, was primarily developed to increase administrative savings and calls for the re-certification of a tenant's rent contribution every three years (with limited interim re-certifications) instead of the standard yearly re-certification. Residents undergoing triennial re-certifications demonstrated the largest income growth among Keene Housing's properties housing work-able households between 2015 and 2018, which led Keene Housing to embark on a systematic assessment of the impact of both rent reform programs on improvements tenant economic outlook.

Study Methods

In August 2020, Keene Housing commenced a study of the impact of its two rent reform initiatives and service combinations to measure the impact of these policies on income growth and employment outcomes. The study uses a randomized controlled trial (RCT) design to examine the impact of each alternative rent model and the receipt of services on a set of household outcomes related to economic independence for working-age non-disabled adults³. Eligible (non-disabled, working-age) households entering Keene Housing's MTW program are randomly assigned to a rent reform treatment group or the control group as they matriculate into Keene's rental programs. The control group consists of households paying rents determined using a standard 30% of income-based rent-setting model substantially similar to those prescribed by most HUD programs. Once assigned to a rent reform group or to the control, households are randomly assigned to participate in the RSR program or to receive no goal-setting services. This method results in two treatment groups plus a control group and six subgroups.

Figure One: Treatment Groups plus Control Group



Rather than serving as a separate treatment, service receipt will act as a covariate due to the size of Keene Housing's programs and the resulting length of time that would be needed to fill five separate service/rent reform combination treatment groups and a control group as part of an RCT design. Based on the average yearly rate of matriculation in and out of Keene Housing's rental programs, each treatment group and the

³ Bloom, Howard. *Getting More from Social Experiments*

control will contain approximately 50 households leading to a total sample size of 150 households by the end of the study, an estimated nine years.

Data

A data benchmark of the two rent reform programs as well as the comparison group and the control group were taken in March 2022. The All Participants section of this report describes current trends in the programs as of 2021 for each treatment group at large (including both new study participants and ongoing study participants). The Random Control Trial (RCT) section of this report describes the current trends for each treatment group in the RCT. Households were excluded from the RCT if they were admitted before August 1, 2020 or had a household head that was elderly or disabled. The data used for this report were extracted through the data systems for Keene Housing and New Hampshire Housing Finance Authority (NHHFA). Data requested included de-identified information on household income and employment status, and household demographics. Quarterly changes in income, education, personal finance, and employment are also collected for a subset of households in the study. Data for each group and field were provided on the dates listed below:

Treatment Group	Type of data	Dates data for each group was collected	
		2020	2021
Annual Recertification	Household demographics	2/23/2021	3/4/22; 1/7/22
	Household income	2/2/2021	3/4/22; 1/7/22
	Quarterly change in employment and education	8/3/20; 12/31/2020	12/22/2022; 1/14/2022
Step Rent	Household demographics	8/3/2020; 10/8/20	1/14/2022
	Household income	8/3/20; 12/31/2020	1/14/2022
	Quarterly change in employment and education	8/3/20; 12/31/2020	12/22/2022; 1/14/2022
Triennial	Household demographics	2/5/2021	3/1/2022
	Household income	2/8/2021	12/22/2022
	Quarterly change in employment and education	8/3/20; 12/31/2020	12/22/2022; 1/14/2022
NHHFA Comparison Group (Annual Recertification)	Household demographics	12/31/2020	8/1/2021

Statistical Analysis

This report provides a broad descriptive summary of the demographics, income, and employment of households in each treatment group. This report does not test for causal associations. A standard t-test is conducted to compare the differences in annual gross income and annual income earned from wages between groups among all participants. Statistical tests comparing the differences between groups are not calculated for the remainder of measures examined in this report.

Results

All Participants

This section describes the demographic, income, and employment characteristics of households in the Step Rent, Triennial, Annual Recertification, and NHHFA Comparison group in 2021. This section includes households that received housing assistance as of 2021 and households that were admitted both before and after the start of the RCT. As of 2021, 106 households were in the Step Rent group, 26 were in the Triennial group, 126 in the Annual Recertification group, and 1,181 in the NHHFA comparison group. Most households in the Step Rent group received RSR goal setting services, while most households in the Annual Recertification and Triennial group did not.

Households by Treatment Group and Receipt of Services as of 2021

Treatment Group	Services	No Services	Total
Step Rent Treatment Group	101	5	106
Triennial Rent Treatment Group	6	20	26
Annual Recertification	18	108	126

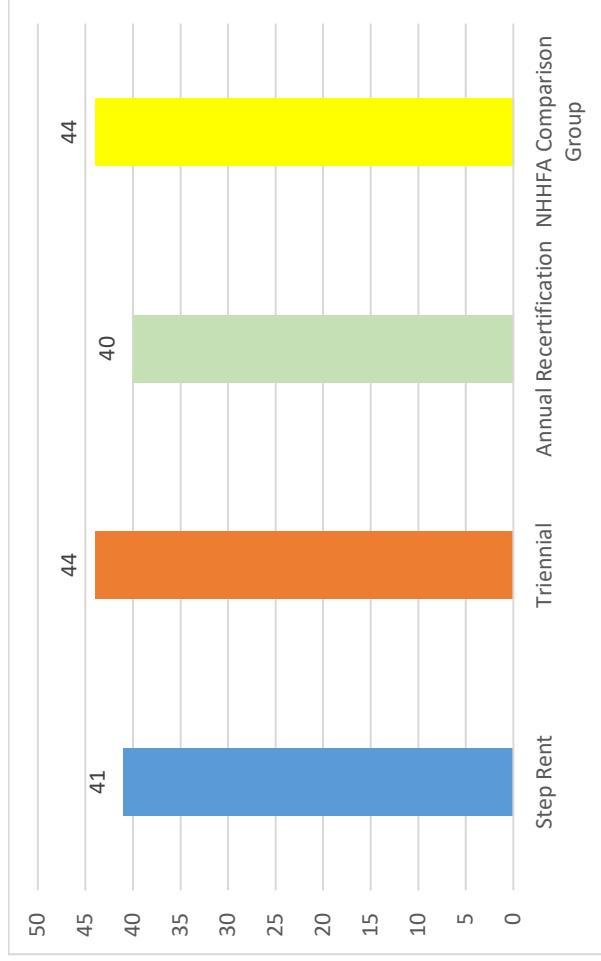
Demographic Composition

Comparing demographic data across groups, the Step Rent group seems to be representative of the households in the Annual Recertification group. Meanwhile, households in the Triennial group appear to be slightly older, have fewer household members, have fewer children, and more household members with a disability.

New data reveals stark differences between the portion of households in the Triennial group that have a household member with a disability compared to the Step Rent and Annual Recertification groups. Forty percent of households in the Triennial group include a household member with a disability, compared to 16% of households in the Step Rent group and 19% of households in the Annual Recertification group. Data on disability status is not available for the NHHFA Comparison group.

The average age of household heads in the Step Rent and Annual Recertification group is 41 and 40 years, respectively. Households in the Triennial group have slightly older household heads, at 44 years, on average. Considering all adults living in a household, the Step Rent and Annual Recertification group continues to have the youngest adult population at 37 and 38 years of age, on average, while the Triennial group continues to have the oldest adult population at 41 years of age, on average. NHHFA does not provide data on the ages of adults living in the household. The Triennial group also has the largest portion of households with members between ages 54 and 61 (31%). The Step Rent, Annual Recertification, and NHHFA Comparison groups have similar portion of households with members between age 54 and 61, ranging between 15% and 17% respectively.

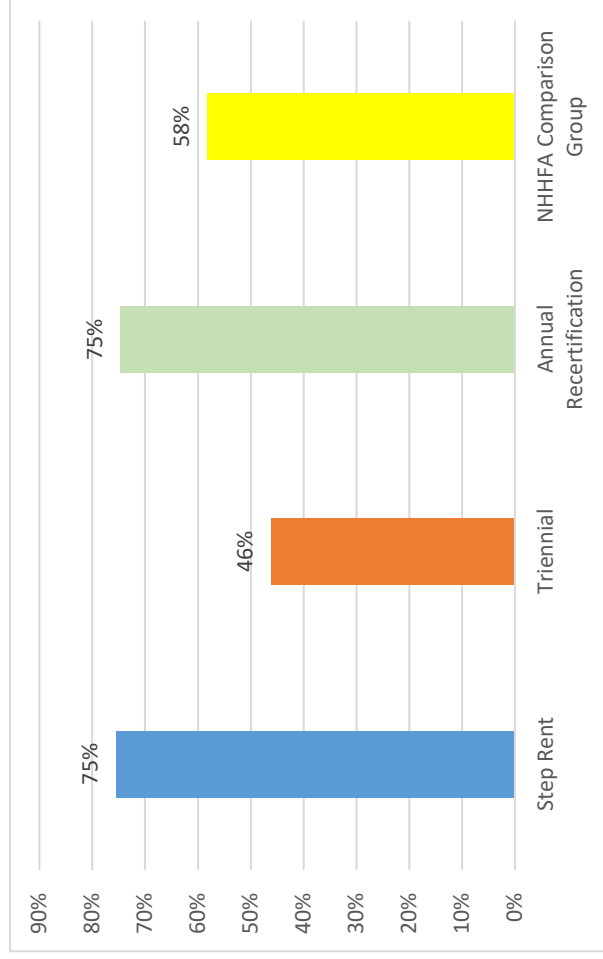
Average Age of Household Head by Group as of 2021



The majority of households across all programs are headed by women. Between 82% and 83% of Step Rent and Annual Recertification households are headed by women, while 65% of Triennial households are headed by women. Data on household head gender were not provided by NHHFA.

Three-quarters of the households in the Step Rent and the Annual Recertification group have children 18. Far fewer of the households in the Triennial (46%) and NHHFA Comparison (58%) group have children. Similarly, while over half of households in the Annual Recertification group have young children under 12, almost one-third of households in the Triennial group have young children under 12. Information on the age of children in a household was not provided by NHHFA. Households in the Triennial group have fewer children, on average: 0.8 per household compared to 1.1, 1.4, and 1.6 in the NFFA, Annual Recertification, and Step Rent groups. Similarly, the Step Rent group exhibits the largest household size, with 3.3 members on average. Meanwhile, the Annual Recertification group has and 2.9 members on average. The Triennial and NHHFA Comparison group exhibit smaller household sizes, with 2.3 to 2.4 members, on average.

Households with Children 18 or Under by Group as of 2021

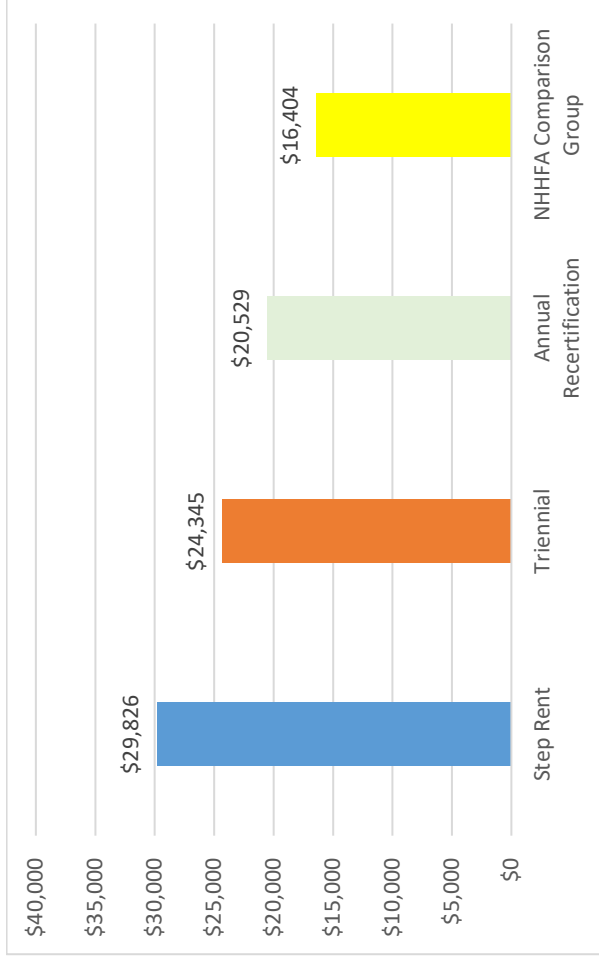


Income and Employment

Gross Income

In 2021, households in the Step Rent program continue to exhibit higher annual household incomes, on average, than do the other groups. The Step Rent program household income was substantially higher at \$29,826, on average, than either the Annual Recertification group, with annual gross household incomes of \$20,529, or the NHHFA comparison group with annual gross household incomes of \$16,404, on average. According to a t-test, the difference in annual gross income between households in the Step Rent and Annual Recertification group is statistically significant (p value= 0.0005). Households in the Triennial group exhibited annual gross household incomes of \$24,345 per year, on average. These differences aren't statistically significant when compared to the Annual Recertification group and Step Rent group using a t-test. However, the Triennial group has the fewest number of households as of 2021, so that this figure may fluctuate as more households are added to the study. Additional data is needed to distinguish whether these differences in annual gross income are related to differences in income upon admission, differences in demographic characteristics across groups, or treatment effects.

Average Annual Gross Household Income by Group as of 2021



Income from Wages

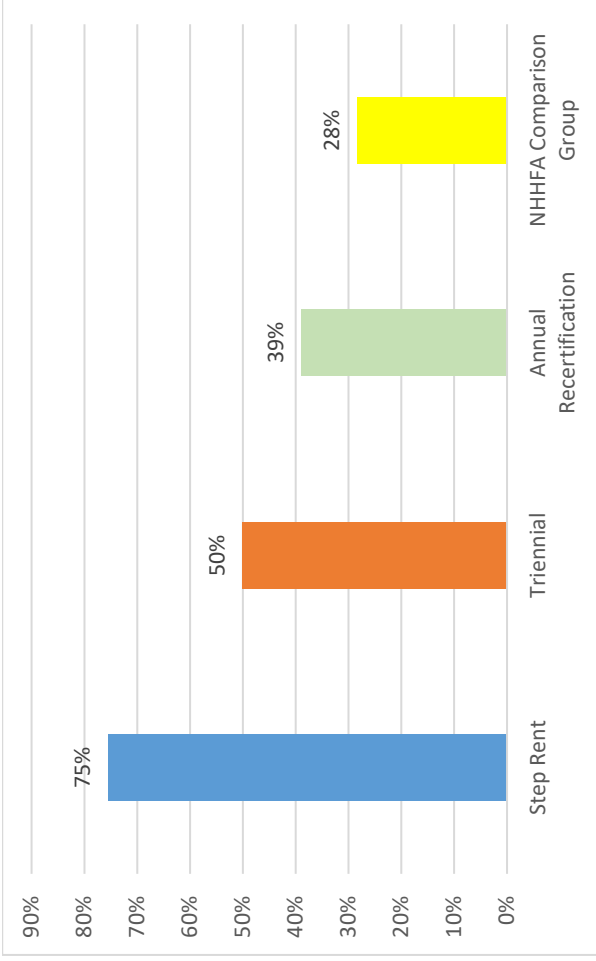
Similarly, households in the Step Rent group also report the highest average annual income earned from wages. Households in the Step Rent group earned \$24,914 from wages, on average, in 2021. Meanwhile, households in the Triennial and Annual Recertification group earned \$14,055 and \$10,526 respectively. Households in the NHHFA Comparison group earned even less of their income from wages, earning \$6,583 from wages annually in 2021, on average. According to a t-test, the difference in average income earned from wages between households in the Step Rent and Annual Recertification group is statistically significant (p value= 0.0000). The difference in income earned from wages between the Step Rent and Triennial group is also statistically significant (p value=0.0114). However, the difference in income earned from wages in the Triennial group and Annual Recertification group is not statistically significant. Additional data is needed to distinguish whether these differences in income earned from wages are related to differences in earnings upon admission, differences in demographic characteristics across groups, or treatment effects.

Percent with Income from Wages

Similarly, households in the Step Rent group earn income from wages at the highest rate. Three-quarters of households in the Step Rent group earned income from wages in 2021, compared to half of households in the Triennial group and over one-third of households in the Annual Recertification group. The smallest portion of households in the NHHFA Comparison group earned income from wages (28%). Given their higher household incomes, Step Rent households fall at 53% of a living wage, on average. Triennial households fall at 48% of a living wage, on average, and Annual Recertification households fall at 38% of a living wage, on average. NHHFA households fall at 31% of a living wage, on average. The living wage estimate comes from a

methodology developed by scholars at MIT and is calculated based on household size and the number of children⁴.

Percent of Households with Someone Earning Wages by Group as of 2021



Total Tenant Payments (TTP)

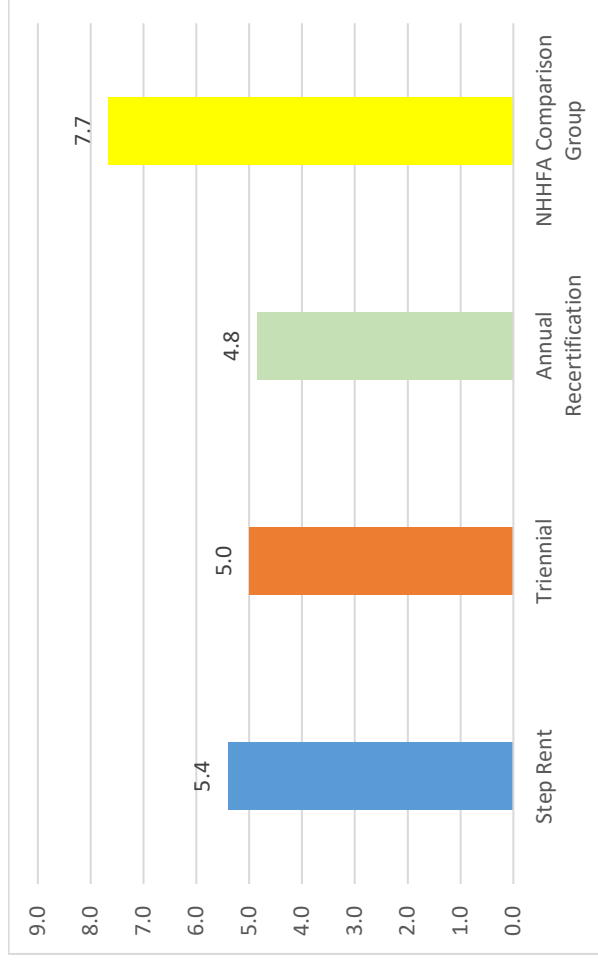
Households in Step Rent group have the highest average monthly TTP (\$573). Households in the Annual Recertification and Triennial group have slightly lower but similar tenant rental payments (TTP), \$505 and \$493 respectively. Meanwhile, households in the NHHFA Comparison group have the smallest TTP at \$423 per month. These differences in TTP are likely reflective of the higher average annual income of households in the Step Rent group. The average rent burden for Step Rent in 2021 is 28%, on average. Households in the Triennial group and NHHFA Comparison group have an average annual rent burden of 30% and 31%, respectively. Households in the Annual Recertification group exhibit an average annual rent burden of 33%.

Length of Stay

Both rent reform groups exhibit lower current stay period than NHHFA tenants. The average time since admittance for the NHHFA tenants is 7.7 years, while the Step Rent group is 5.4 years. Households in the Annual Recertification and Triennial group have been in the program for between 4.8 and 5.0 years, on average.

⁴ MIT [living wage calculator](#) for Cheshire County, NH.

Average Years since Admittance by Group as of 2021



Additional Financial Measures

Step Rent tenants also provided additional financial and education data. Two-thirds of Step Rent tenants report being employed full-time and 18% employed part-time. They also report an average household savings of just over \$600 and a maximum credit score of 542, on average. Three percent of households in the Step Rent group had someone pursuing post-secondary education. Ten percent recently received a raise. Among the households that participated in the Step Rent program in 2020, a third reported an increase in their savings compared to the year prior. Additionally, 58% earned more income from wages in 2021 compared to 2020.

Random Control Trial

This section describes the demographic, income, and employment characteristics of households in the Step Rent, Triennial, Annual Recertification, and NHHFA Comparison group that were admitted after July 31, 2020 and are a part of the RCT. Currently the number of households assigned to each group is not evenly distributed. As of 2021, six households were randomly assigned to the Step Rent group, nine in the Triennial group, and 14 in the Annual Recertification group. Among these households, 17% in the Step Rent group, 67% in the Triennial group, and 57% in the Annual Recertification group have been assigned to receive RSR goal setting services. An additional 112 non-elderly households were admitted to the NHHFA Comparison group after July 31, 2020. Since few households have been admitted to the RCT, statistical significance testing will not be performed. Similarly, since few households in the RCT have been assigned to receive RSR goal setting services, comparing metrics between groups by RSR participation will not be evaluated in this data summary. These results in this section are for informational purposes only and are expected to fluctuate as more households enter the program.

Households by Treatment Group and Receipt of Services in RCT as of 2021

Treatment Group	Services	No Services	Total
Step Rent Treatment Group	1	5	6
Triennial Rent Treatment Group	6	3	9
Annual Recertification Treatment Group	8	6	14

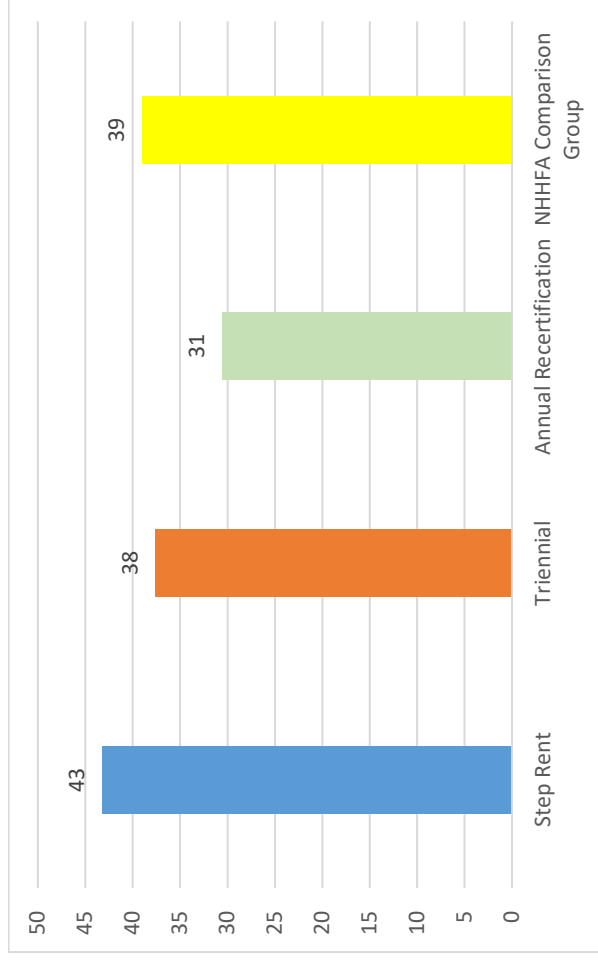
Demographic Composition

The initial households randomly assigned to the Step Rent and Triennial groups through 2021 appear to differ from households assigned to the Annual Recertification group. Notable differences include that households assigned to the Step Rent group appear to have higher incomes upon admission, are slightly older, and have larger household sizes. Meanwhile, households assigned to the Triennial group appear to be headed by women less frequently compared to the Annual Recertification group. Finally, both the Triennial and Step Rent groups appear to have a smaller portion of households with children and a larger portion of households with a member that has a disability compared to the Annual Recertification group.

Households randomly assigned to the Step Rent and Triennial group as of 2021 have smaller rates of disability compared to households assigned to the Annual Recertification group. Seventeen percent of households assigned to the Step Rent and 13% of households assigned to the Triennial groups include a household member with a disability, compared to 0% of households assigned to the Annual Recertification group. While households headed by non-elderly non-disabled members are disqualified from participating in the RCT, these are likely households that include dependents or other adult household members with a disability.

Households randomly assigned to the Step Rent group through 2021 are slightly older households assigned to the Annual Recertification group. The average age of the household head randomly assigned to the Step Rent group is 43 years. Households assigned to the Triennial group are slightly younger, at 38 years, on average. Similarly, households admitted to the NHFFA Comparison group after the RCT began are 39 years, on average. Household heads assigned to the Annual Recertification group are the youngest at 31 years, on average. Households assigned to the Annual Recertification group also have the youngest adult population of 30 years of age, on average. Households assigned to the Step Rent and Triennial group have similar adult populations of 43 and 39 years of age, on average. NHFA does not provide data on the ages of adults living in the household. Households assigned to the Annual Recertification group also have the fewest percentage of households with members between age 54 and 61 (0%). The Triennial and Step Rent groups have similar portions of households with adults between age 54 and 61, ranging between 11% and 33% respectively.

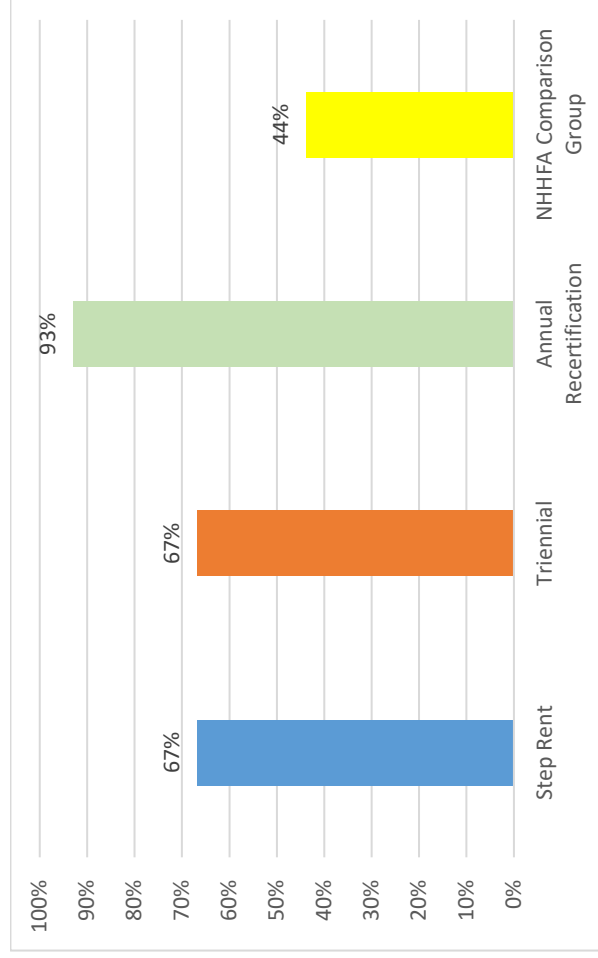
Average Age of Household Head by Group in RCT as of 2021



Between 67% and 79% of households assigned to the Step Rent and Annual Recertification group are headed by women. Meanwhile, only 33% of households assigned to the Triennial group as of 2021 are headed by women. Data on household head gender were not provided by NHHFA.

Households assigned to the Annual Recertification group have children at the highest rates. Ninety-three percent of households assigned to the Annual Recertification group through 2021 have children, compared to only 67% assigned to the Step Rent and Triennial groups. Far fewer of the households in the NHHFA Comparison (44%) group have children. Additionally, 93% of households assigned to the Annual Recertification group have children, compared to 67% of households assigned to the Step Rent group and 56% of households assigned to the Triennial group. Households assigned to the Step Rent group have the most children on average: 2.0 per household compared to 1.7 and 1.3 in the Annual Recertification and Triennial groups. Households in the NHHFA Comparison group have fewer children on average, reporting only .9 children per household. Similarly, households assigned to the Step Rent group exhibit the largest household size, with 3.3 members on average. The Annual Recertification and Triennial groups exhibit slightly smaller household sizes, with 3.0 and 2.6 members, on average. The NHHFA Comparison group exhibits the smallest household size, with only 2.1 members per household, on average.

Households with Children 18 or Under by Group in RCT as of 2021



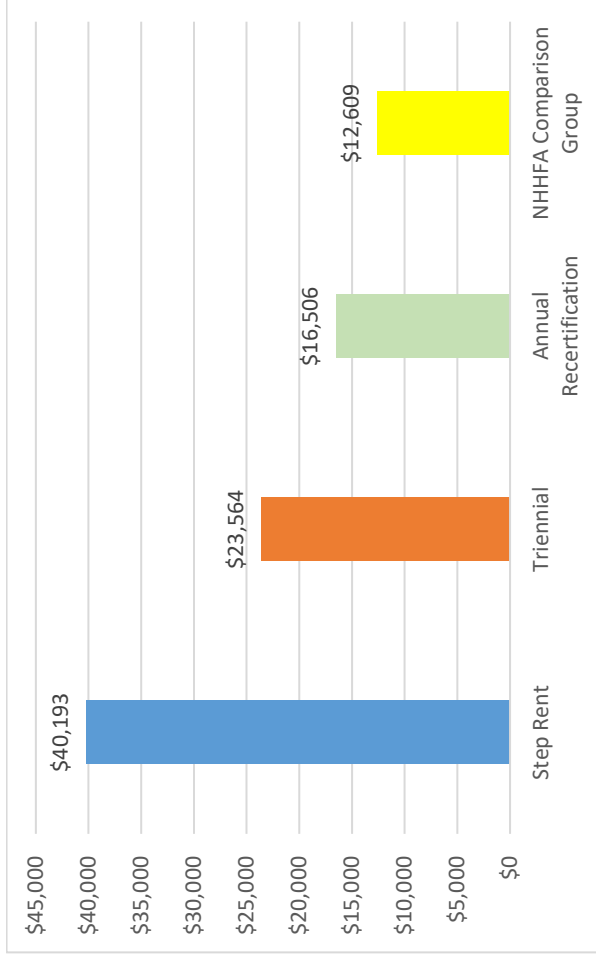
Income and Employment

Gross Annual Income

In 2021, households assigned to the Step Rent program continue to exhibit higher annual household incomes, on average, than do the other groups. Households randomly assigned to the Step Rent program through 2021 earned an average household income of \$40,193 in 2021. Meanwhile, households assigned to the Annual Recertification group earned an average annual gross household income of \$16,506 and the Triennial group earned an average annual gross household income of \$23,564. Households in the NHHFA Comparison group earned the lowest, with an average annual gross household income of \$12,609 in 2021. However, all of the households assigned to the Step Rent were admitted in 2021, meaning these differences in income are not related to the treatment effect of the Step Rent program. Households assigned to the Step Rent group through 2021 earned \$40,193 upon admission, compared to only \$21,119 in the Triennial group and \$16,637 in the Annual Recertification group.⁵ Additional time will be needed to evaluate the treatment effect of these rent reform programs on changes in income.

⁵ Household incomes were adjusted to 2021 dollars.

Average Annual Gross Household Income by Group in RCT as of 2021



Income from Wages

Similarly, households assigned to the Step Rent group also report the highest average annual income earned from wages. Households randomly assigned to the Step Rent group earned \$31,186 from wages, on average, in 2021. Meanwhile, households randomly assigned to the Triennial and Annual Recertification group earned \$16,584 and \$12,306 respectively. Households in the NHHFA Comparison group earned even less of their income from wages, earning \$4,104 from wages annually in 2021. Again, however, all households assigned to the Step Rent group were admitted in 2021, so these differences in income earned from wages are related to differences in income upon admission rather than treatment effects of the rent reform program. Households assigned to the Step Rent group through 2021 earned \$31,186 from wages upon admission, compared to only \$21,542 in the Triennial group and \$12,133 in the Annual Recertification group.⁶

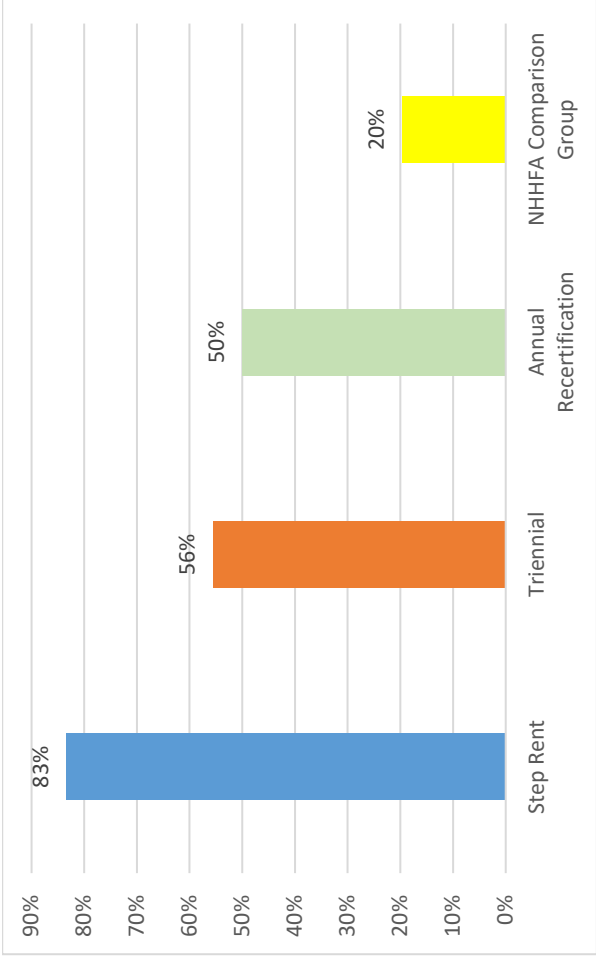
Percent with Income from Wages

Similarly, households assigned to the Step Rent group earn income from wages at the highest rate. Eighty-three percent of households randomly assigned to the Step Rent group earned income from wages in 2021, compared to 56% of households assigned to the Triennial group and half of households assigned to the Annual Recertification group. The smallest portion of households in the NHHFA Comparison group earned income from wages (20%). Given their higher household incomes, households assigned to the Step Rent group fall at 75% of a living wage, on average. Households assigned to the Triennial group fall at 26% of a living wage, on average, and Annual Recertification households fall at 40% of a living wage, on average. NHHFA households admitted after the beginning of the RCT fall at 27% of a living wage, on average. The living

⁶ Household incomes were adjusted to 2021 dollars.

wage estimate comes from a methodology developed by scholars at MIT and is calculated based on household size and the number of children⁷.

Percent of Households with Someone Earning Wages by Group in RCT as of 2021



Total Tenant Payments (TTP)

Households randomly assigned to the Step Rent group as of 2021 have the highest average monthly TTP (\$567). Households assigned to the Triennial group have slightly lower TTPs, paying \$459 per month on average. Meanwhile, households in the NHHFA Comparison group and households assigned to the Annual Recertification group have the lowest TTPs, paying \$317 and \$351 per month on average respectively. While households assigned to the Step Rent group have the highest TTP, they also have the lowest average rent burden, paying only 16% of their income in rent, on average. Households in the Triennial group had the highest rent burden, paying 41% of their income on rent, on average.⁸ Households assigned to the Annual Recertification group exhibit an average annual rent burden of 29% and NHHFA Comparison group households have an average rent burden of 36%.

⁷ MIT [living wage calculator](#) for Cheshire County, NH.

⁸ Households with \$0 income with a TTP>\$0 have a rent burden of 100%. This rent burden for the Triennial and Annual Recertification groups is skewed by two households earning \$0 paying \$125 per month on rent. Excluding households with \$0 gross annual incomes, the rent burdens for these groups are both 25%.

Conclusions

All Participants

Looking at all households assisted by Keene, participants in the Step Rent and Annual Recertification groups are fairly similar in demographic characteristics. As a result, the Annual Recertification group represents reasonable control or comparison groups to be used to understand the impacts of participating in Keene's Step Rent program. However, new data on disability status among households in the Triennial group highlights some notable differences between the Triennial and Annual Recertification group that were not apparent before. Additionally, the percentage of households with children in the Triennial group decreased in 2021 due to turnover, further raising some new differences among the Triennial and Annual Recertification groups that could impact the comparability of these groups. The characteristics of the Triennial group may continue to fluctuate due to the small sample. Looking at the income and employment characteristics across groups, we find that households in the Step Rent group have higher average annual gross incomes (\$29,826), average income earned from wages (\$24,914), and a higher portion of households earning income from wages (75%) compared to households in the Annual Recertification group. Households in the Triennial group also have higher average annual gross incomes (\$24,345) and income earned from wages (\$14,055) compared to the Annual Recertification group, however these differences are not statistically significant. Additional analyses and data will be needed to determine if these differences in income and employment across groups are related to treatment effects or differences in demographic characteristics or income upon admission.

Random Control Trial

Despite random assignment, there are some differences between the number and characteristics of households randomly assigned to each treatment group in the RCT through 2021. While a comparable number of households have been assigned to the Step Rent and Triennial group (6 vs 9 households), 14 households have been assigned to the Annual Recertification group. Additionally, a smaller portion of households in the Step Rent group have been assigned to participate in the RSR program. We also observe some early differences in the demographic characteristics of the households randomly assigned to the Step Rent and Triennial groups compared to the Annual Recertification group. Compared to households assigned to the Annual Recertification group through 2021, households assigned to the Step Rent group appear to have higher incomes upon admission, are slightly older, and have larger household sizes, while households assigned to the Triennial group appear to be headed by women less frequently. Additionally, households assigned to both the Step Rent and Triennial group appear to have a smaller portion of households with children and have a larger portion of households with a member that has a disability compared to households assigned to the Annual Recertification group. There are still a small number of households assigned to each group in the RCT, so these differences should even out as more households are entered into the study. We will continue to update the benchmarks yearly both aggregated by program and aggregated by new individuals entering the study by program.

There are currently too few households and not enough time in the study to evaluate the treatment effects of the rent reform programs. While households randomly assigned to the Step Rent group through 2021 report the highest gross annual incomes, income from wages, and employment rates, all Step Rent households were admitted in 2021. Therefore, these comparisons reflect differences upon admission rather than the treatment effect of the rent program. Additional households in the study and time are needed to evaluate the effects of the rent reform programs.