



LEXINGTON HOUSING AUTHORITY

MOVING TO WORK

FY2020 Annual Plan

Technical Amendment
Submitted May 1, 2020



Creating Affordable Housing Solutions



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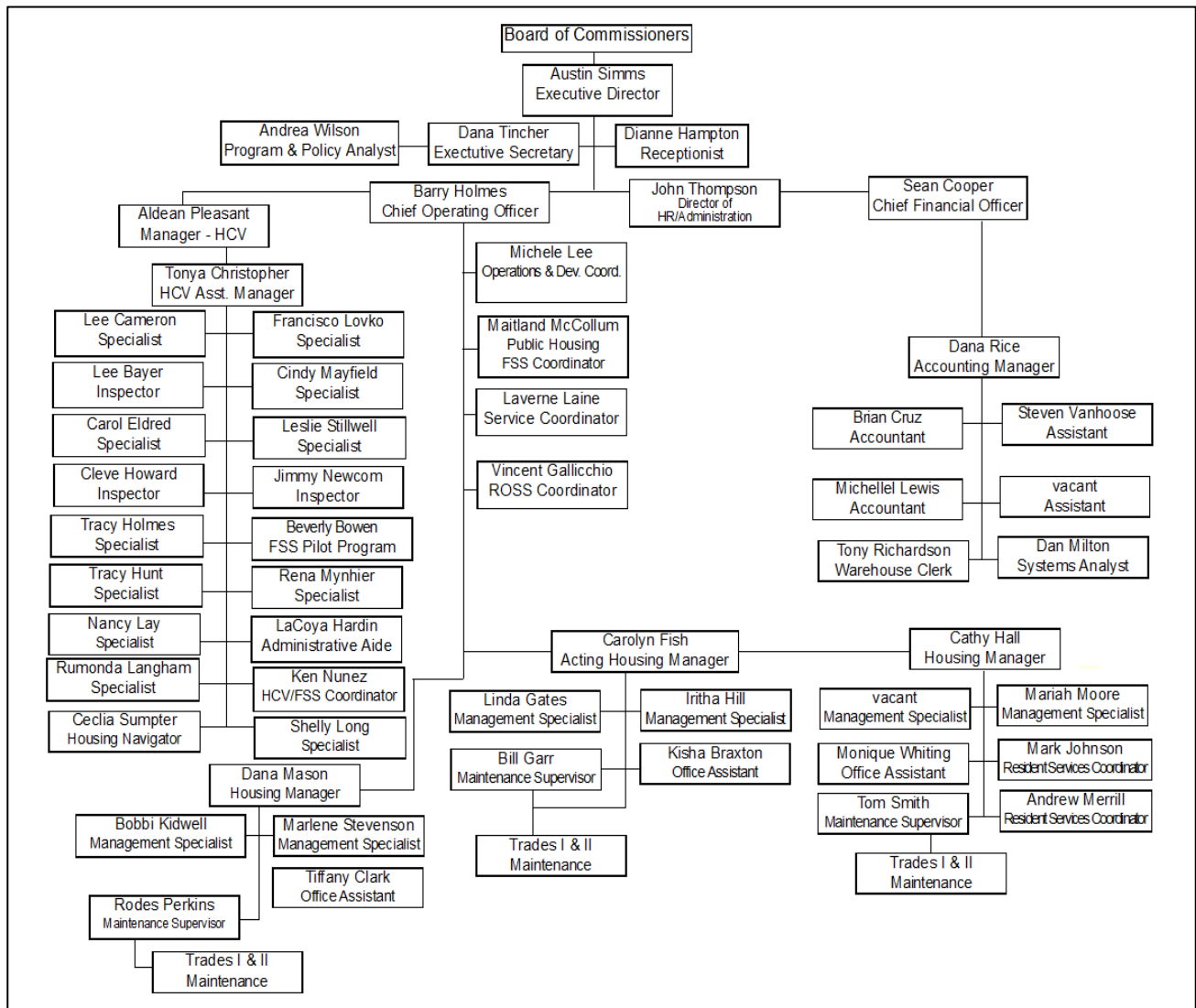


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I. Introduction

The Lexington-Fayette Urban County Housing Authority (LHA) submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011 with the execution of an MTW Agreement between HUD and LHA. In April 2016, HUD extended the agreements of all 39 MTW agencies until 2028. This FY2020 Annual MTW Plan marks the LHA's ninth year in the Demonstration.

The MTW demonstration allows public housing authorities to design and test activities and policies that further at least one of the statutory goals to reduce costs and achieve greater cost effectiveness; encourage self-sufficiency households with children; and, increase housing choices for low-income families.

Overview of Short-Term and Long-Term Objectives

Short Term Objectives

Renovation of Ballard Towers

In March 2018 the LHA was awarded 9% low-income housing tax credits (LIHTC) that will make financing the renovation possible. The \$10.9 million rehabilitation will include new energy efficient windows, new energy efficient bath fixtures and LED lighting fixtures, as well as aesthetically pleasing interiors with new floor finishes, new kitchen cabinets, new entry and interior doors, and an updated paint scheme.

In February 2019 Ballard residents began transferring to vacant units in the Ballard building and the adjacent Connie Griffith Towers elderly high-rise. Rehabilitation of the building will occur in phases by wing and residents have been advised that approximately six months will be required to complete work on their units. Completion of both wings is anticipated in twelve (12) months.

Ballard Apartments (non-MTW units) is an eight-story high rise located in downtown Lexington, with 134 one-bedroom units serving persons aged sixty-two and over. Ballard Place Apartments was originally constructed in 1978 by LHA. The building was most recently rehabilitated in 1999. Eighteen years after that renovation, the building has inefficient plumbing fixtures, lighting, windows, and outdated décor. The old windows lack energy efficiency and are allowing water intrusion; which is causing damage to the units and the building.

LHA Leadership Academy

Developing leaders and leadership qualities is a priority for the LHA. In 2018 the agency introduced the Leadership Academy for LHA employees. The voluntary program was made available to all employees of the Housing Authority. An application process and a supervisor's letter of recommendation were required for consideration. LHA management chose to limit the first class to no more than ten participants. The inaugural class of six LHA employees committed to six months of once-a-month day-long sessions, usually held outside of LHA offices and a finale group project. The group explored topics related to local business, government, law enforcement, social services and the arts. The final project for the class required that class members split into two groups made a presentation of their choosing on a community initiative, non-profit agency or any endeavor that was of interest each group. The presentations were held at the end of the six-month sessions and presented during a staff meeting. The success of the Leadership Academy has led management to offer the program in 2019 and extend it to eight months.

Addressing the Opioid Crisis

Our commitment to addressing the needs of the community at-large include directing rental assistance to those in persons in substance abuse recovery. Lexington has not been immune to the opioid crisis that is affecting communities across the U.S. The HOPE Center, a local organization and long-time partner with the LHA, seeks to address homelessness and substance abuse, is constructing a 48-unit facility that will provide independent living to men in recovery. The LHA has requested in the FY2020 Plan year to offer monthly block grant funding for these units (Activity 12).

Approval Pending for Voluntary Conversion of Connie Griffith Towers

In April 2018 the LHA submitted application for Voluntary Conversion of Connie Griffith Manor (Griffith), a 183-unit, 10 story public housing high rise for seniors owned and operated by the LHA. Griffith is connected by a 1-story structure to Ballard, 134-unit high-rise for seniors. The application is still pending approval by HUD.

It is anticipated that, subject to fulfillment of all HUD requirements, the result of Griffith's voluntary conversion will be renovated at a cost of approximately \$11 million, assisted by project-based vouchers (PBV) with continued availability to current and future low-income households. Once the property receives approval for tenant-based vouchers for the Griffith public housing units, the LHA will use the authorizations of previously approved activities that address waiving certain PBV rules to complete the conversion.

After approval of voluntary conversion and establishment of PBV designation, the LHA hopes to be able to utilize LIHTC. The owner entity will be a limited partnership of which LHA's related entity will be the sole general partner. These activities are anticipated to be completed within 24 months from HUD approval of voluntary conversion and award of the tax credits.

Long Term Objectives

Addressing the Capital Needs Deficit

HUD's recent estimate of a \$26 billion+ deficit for capital improvements to public housing across the country has led the LHA to examine ways to address the problem locally. The LHA is actively working to answer the needs of public housing that is gradually falling into disrepair without adequate funds to repair them. In early 2019 LHA senior staff met with its Board of Commissioners and consultants to discuss funding methods that will transform public housing. Specifically, the possible conversion of some or all 1,097 public housing units to other HUD programs are options HUD is encouraging. Those options are: the Rental Assistance Demonstration (RAD), Voluntary Conversion, Demolition and Disposition and Retention of Assets after a Declaration of Trust (DOT) release.

Craft Local Initiatives to Address Long-Term Needs

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

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

To further both the federal and local MTW objectives listed above; the LHA has sought and received HUD approval to implement 22 MTW activities since entering the program in 2011. Below is a chart summarizing the LHA's MTW activities. The numbers in the statutory objectives column of the table corresponds with the numbered objectives above.

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
1	Minimum Rent Increase to \$150 Across All Housing Programs	-FY2012-13 -FY2014 Significantly Modified	Ongoing Implemented agency-wide April 1, 2014	2
2	Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents	-FY2012-FY2013	Closed Out FY2014 and replaced with Activity 13	1
3	Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households	-FY2012-FY2013 Significantly - Modified FY2014 -FY2016 Request Approval to change HUD Form 9886	Closed Out FY2018	1
4	HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy	FY2012-FY2013	Closed Out FY2015	1 & 2
5	Streamlined HQS Inspection Policy for HCV Units	- FY2012-13 -FY2014 (Significantly Modified)	Ongoing Implemented FY2015	1
6	Biennial Housekeeping Inspection Policy for Public Housing Residents	FY2012-FY2013	-Not Implemented -Closed out	1
7	Public Housing Acquisition Without Prior HUD Approval	FY2012-FY2013	Not Implemented until necessary	3
8	Conversion of Appian Hills Public Housing to Project-Based Vouchers	-FY2012-FY2013	Modified in FY2014 - Pimlico Converted to	3

		-FY2014 Significantly Modified	PBV w/ RAD/Not Implemented	
9	Development of Project-Based Voucher Units at 800 Edmond Street	FY2012-FY2013	Not Implemented Resources used for RAD revitalization of Pimlico	3
10	HCV (Tenant-Based) Special Partners Programs	-FY2012-FY2013 -FY2014 Significantly Modified Modified FY2020	Re-Proposed FY2020	3
11	Local, Non-Traditional Use of MTW Funds: Emergency Reserves for Connie Griffith-Ballard Towers	- FY2012-FY2013 -FY2014 Significantly Modified	Not Implemented until/ necessary for emergency capital repairs	3
12	Local, Non-Traditional Use of MTW Funds for HCV Special Partners With Designated Units	FY2014 Modified FY2020	Re-Proposed FY2020	2 & 3
13	Local Self-Sufficiency Admissions and Occupancy Requirements	FY2014	Ongoing	2
14	Elimination of Earned Income Disallowance	FY2015	Ongoing	1
15	Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Closed Out FY2016	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	Ongoing	2
17	Limit Interim Re-examinations for Public Housing Households	FY2016	Ongoing	1
18	Streamlined HQS Inspection of LHA-Owned/Controlled Property	FY2017	Ongoing	1
19	Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	FY2017	Ongoing	3
20	Assign Project-Based Vouchers To LHA Owned and Controlled Units Without Bid Process	FY2017	Ongoing	3
21	Triennial Certifications For HCV Homeownership Participants (Rent Reform)	FY2017	Ongoing	1
22	HCV Time Limit Pilot Program (Rent Reform)	FY2018	Ongoing	1, 2 & 3
23	Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/ Controlled Properties	FY2018 Amended Plan	Ongoing	1
24	Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/ Controlled Units (proposed FY2019).	FY2019	Not Yet Implemented	1
25	HCV – Allow Excluded Income to Make Units Affordable	FY2020	Proposed	3

II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0
N/A	0	0	0	0	0	0	0	N/A	0	0

Total Public Housing Units to be Added in the Plan Year

0

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

If "Population Type" is "Other" please describe:

N/A

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Connie Griffith/KY04	183	Voluntary Conversion pending for Connie Griffith.
N/A	0	N/A
N/A	0	N/A

183

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Connie Griffith	183	No	Elderly high-rise – voluntary conversion application pending
N/A	0	N/A	N/A

183

Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Centre Meadows	206	Complete	Yes	Family site renovated in 2014
N/A	0	N/A	N/A	N/A

206

Planned Total Existing Project-Based Vouchers

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
In April 2018 the LHA submitted application for Voluntary Conversion of Connie Griffith Manor (Griffith), a 183-unit public housing high rise for seniors owned and operated by the LHA. Griffith is connected by a 1-story structure to Ballard, 134-unit high-rise for seniors. The application is pending approval by HUD. If Voluntary Conversion is approved, it is anticipated that the site will be converted to project-based vouchers.

vi. General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
Management Improvements -PHA Wide Software Upgrade \$179,182 Administration -Capital Fund Fee \$179,182 Fees and Costs -PHA Wide A & E Fees \$268,774 RPCA-PNA-EA -PHA Wide \$150,000 KY004000001 -Lexington South: Replace front & back storm doors; replace crawl space doors; single-family window replacement; parking lot replace/repair \$207,196 KY004000002 -Lexington West: Tub surround replacement; roof replacement; drainage excavation \$257,761 KY004000003 -Unnamed: Bathroom vanity & cabinet replacement, kitchen cabinet & counter top replacement; doors & window replacement; perimeter fence replacement; retention basin gate replacement; roof & gutter replacement \$184,602 KY004000007 -Homownership: Fence replacement & repair \$43,000 KY004000010 -Bluegrass Apartments: ION Monitoring \$39,501 KY004000013 -Bluegrass Phase III: ION Monitoring \$74,066

B. LEASING INFORMATION

i. Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	10524	877
MTW Housing Choice Vouchers (HCV) Utilized	26580	2215
Local, Non-Traditional: Tenant-Based^	5232	436
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	42336	3528

* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** “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.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Local, Non-Traditional Uses of MTW Funds for Special Partners/Activity 12	5232	436
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	Vacant units at Connie Griffith (183 units) are being held for relocation of Ballard residents for rehabilitation and Voluntary Conversion is pending for Connie Griffith.
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Regional Waiting Lists	3182	Closed	Yes
Housing Choice Voucher	Community Wide	3016	Closed	Yes
PBV	Centre Meadows	629	Closed	Yes
Local, Non-Traditional MTW Assistance	Program Specific	N/A	Open	Yes

Please describe any duplication of applicants across waiting lists:

There is duplication across all available waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
N/A	N/A
N/A	N/A

III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

N/A

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted
Implemented Activities

Activity 1: Increase Rent to \$150 Across All Housing Programs

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

This activity is ongoing and based on FY2018 reporting, the average earned income across all programs was up approximately 9% from \$17,112 in 2017 to \$18,626 in 2018. Agency-wide, households (excluding elderly, disabled and special partner program households) reported earned income as follows:

Households Reporting Earned Income			
FY2015	FY2016	FY2017	FY2018
844 of 2,093 HHs	1,442 of 2,024 HHs	1,762 of 2,556 HHs	1,601 of 2,154 HHs
40%	71%	69%	74%

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA has determined that HUD Standard Metric CE #5 Rental Revenue for the HCV program has been reported previously as revenue when the LHA receives no revenue from rent payments, rent is paid to private landlords. We have determined that to show increases in revenue for HCV, the Housing Assistance Payments (HAP) should be analyzed and decreases in HAP would indicate that the LHA is paying less to the landlord for the HCV participant precipitating a savings. Therefore, going forward the metrics for HCV in CE #5 will track HAP and monthly per unit cost.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 5: Streamlined HQS Inspection Policy for Housing Choice Voucher Program**i. Plan Year Approved, Implemented, Amended**

Activity_Proposed FY 2012 – FY 2013 Plan /Significantly Modified FY2014 Plan/Implemented FY2015

ii. Description/Update

The LHA has modified the inspection intervals for HCV landlords based on a star-rating system. Landlords are assigned a star-rating between one and three based on inspection history, failed inspections, abatements and complaint inspections. New landlords to the program are assigned a 2-Star Rating until historical data can be compiled. A 3-Star Rating allows for 30 months between HQS inspections; a 2-Star Rating allows for 24 months between inspections; and, a 1-Star Rating requires an HQS inspection every 12-months. This policy requires that at-risk/problematic properties be inspected more frequently, and compliant properties have longer between inspections. This activity is ongoing. During FY2018 over 800 landlords were rated, with 91% (780) assigned the 2-Star Rating; 8% (72) assigned the 3-Star Rating and less than 1% (4) assigned the 1-Star Rating.

iii. Planned Non-Significant Changes

In response to the COVID-19 (coronavirus) and the state of emergency declared by the state of Kentucky on March 6, 2020, the Lexington Housing Authority (LHA) proposes to suspend the landlord rating system and delay HQS inspections as necessary until safe, feasible and practical to resume. HQS inspections may be delayed until 12/31/2020. In addition, LHA has adopted the following HUD waivers necessary for this activity:

HQS-1 Initial inspections

- Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies; Availability Period: 7/31/20
- Where self-certification was used, PHA must inspect the unit no later than October 31, 2020.

HQS-6 Interim Inspections

- Waives the requirement for PHA to conduct interim inspection and requires alternative method
- Allows for repairs to be verified by alternative method; Availability Period 7/31/20

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 10: Housing Choice Voucher Tenant-Based Special Partners Programs

i. Plan Year Approved, Implemented, Amended

Proposed FY2012 – 2013

Amended FY2014

Amended FY2020

ii. Description/Update

Providing HCV rental assistance to special partners that provide social services in the community is crucial to addressing the unique issues of at-risk populations. Proposed in FY2012 – 2013 and amended in FY2014, the LHA currently provides voucher assistance to a maximum of 32 participants for the Bluegrass.org and Community Action Council (CAC). Bluegrass.org (22 vouchers) provides wraparound services for persons with severe mental illness or substance abuse diagnoses who have completed treatment and are involved in recovery services. CAC (10 vouchers) provides case management to Foster Care youth aging out of the system. The LHA would like to offer voucher funding to one additional special partner program that provides social services in Lexington. Voucher funding is requested for:

Arbor Youth Services receives funding for three (3) vouchers, thereby reducing CAC's funding from ten (10) to seven (7) units. CAC has not leased the maximum ten units since the activity as implemented. Arbor Youth Services helps youth who are between 22 and 24 years of age who are experiencing homelessness transition into housing.

This activity permits the LHA to provide an admissions preference to families eligible for and willing to participate in these special partner programs as a condition of continued assistance. While LHA hopes the majority of these families will subsequently seek unsubsidized housing in the private market, these households will also be eligible to apply for public housing or another HCV voucher (including Family Self-Sufficiency vouchers) through the Authority's normal application procedures.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 12: Local, Non-Traditional Uses of MTW Funds for Special Partners

i. Plan Year Approved, Implemented, Amended

Activity Proposed FY2012- 2013
Modified FY2014 and FY2020

ii. Description/Update

The Housing Authority provides a fixed monthly rental subsidy to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 388 families with special needs. HCV staff has signed Memoranda of Understanding (MOUs) in with each special partner program.

These partnerships provide service-enriched housing to households while they participate in a program offered by the non-profit organization. This local, non-traditional initiative permits specified special partner organizations to alter their programs in two specific ways:

With Housing Authority approval, special partner organizations are permitted to require that participants reside in designated service-enriched housing units in order to receive rental subsidy; and

With Housing Authority approval, special partner organizations are permitted to house program participants in HUD-defined special housing types. Within these special housing type units, partner organizations will also be permitted to request Housing Authority approval to house up to two unrelated adults in a zero- or one-bedroom unit.

During FY2020, the LHA proposed to increase funding for a special partner program – the HOPE Center, that provides monthly block grant funding for 144 for persons who have substance abuse problems and are in need of voluntary or court-mandated treatment. In a response to the opioid crisis, the LHA plans to increase block grant funding for an additional 48 units for a new facility under construction and operated by the HOPE Center that will house addicts in recovery.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 13: Local Self-Sufficiency Admissions and Occupancy Requirements

i. Plan Year Approved, Implemented, Amended

Activity proposed/approved FY2014; A technical amendment submitted January 14, 2016 and approved January 20, 2016

ii. Description/Update

The majority of the LHA's housing stock are designated as Self-Sufficiency (SS) I or Self-Sufficiency (SS) II housing which requires households at these sites to work 20-hours (SS I units) or 37.5-hours (SS II units) per week depending on the site. If the household loses employment, they are subject to rent based on imputed income at 20 or 37.5 hours, multiplied by the federal minimum wage for 52 weeks. The LHA's PBV site, Centre Meadows (CM), a 206-unit family site, is included in this activity and households at CM are required to work at least 20 hours per week or households are subject to imputed income for those households not working; 878 public housing units are designated as SS I or II. Elderly and disabled households are excluded from this activity and families who lose income through no fault of their own may submit a hardship request. This activity is ongoing.

iii. Planned Non-Significant Changes

In response to the COVID-19 (coronavirus) and the state of emergency declared by the state of Kentucky on March 6, 2020, the Lexington Housing Authority (LHA) proposes to suspend imputed income for households that do not meet the minimum employment requirement. Households that request an interim based on loss of employment, rent will be calculated based on their current income. Employment requirements will be waived for new admissions if the head of household or co-head is currently unemployed and has prior employment history of at least six months. Availability Period: Until December 31, 2020

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 14: Rent Reform: Elimination of Earned Income Disallowance

i. Plan Year Approved, Implemented, Amended

Activity Proposed, Approved, and Implemented – FY2015 Plan

ii. Description/Update

LHA staff proposed to eliminate the Earned Income Disallowance (EID) calculation for public housing and HCV disabled households. Federal regulations mandate the exclusion of earnings for public housing households for an individual family member or HCV disabled household for a maximum of 24 consecutive months with an overall lifetime limit of 48-months. No public housing or HCV disabled household receive the

EID and no new program participants may receive the EID. Elimination of the EID calculation has been successful in reducing the administrative burden of monitoring household members receiving the EID and tracking employment. This activity is ongoing.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 16: HCV Rent Reform Study

i. Plan Year Approved, Implemented, Amended

Approved, and Implemented – FY2015

ii. Description/Update

In July of 2018 the LHA saw the first triennial recertifications for the HCV Rent Reform study group participants. The policy substitutes triennial recertification of a households’ income for annual recertification and it is not necessary for study group participants to report increases in income. The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD.

HCV staff reports that the following update following the first triennial certification in July 2018: 13 Study Group participants have achieved zero HAP and 103 increases in income in the Study Group. As reported in the FY2018 MTW Annual Plan, HCV Rent Reform Study participation is as follows:

RENT REFORM STUDY PARTICIPANTS			
<i>Year</i>	<i>Study Group</i>	<i>Control Group</i>	<i>Total</i>
Enrollment 7/2015 -12/31/2015	513	516	1,029
FY2018	361	359	720

LHA staff is encouraged by the preliminary outcomes to date. The LHA continues to work with Emphasys (the software vendor) to extract data needed to adequately report on this activity. Emphasys has not provided all the necessary reports to conduct a full analysis of the data.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 17: Limit Interim Re-examinations for Public Housing Households**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2016

ii. Description/Update

The LHA limits interim re-examinations for public housing households to one for households seeking reductions in rent based on reductions in earned income. This restriction applies to all households who are not defined as elderly or disabled households. At any time between required annual re-examinations and after one interim reduction in rent, a family residing in public housing may submit a written hardship request for an exemption to the interim rent reduction policy (see Appendix B). All cases are reviewed on a case-by-case basis. This activity is ongoing.

iii. Planned Non-Significant Changes

In response to the COVID-19 (coronavirus) and the state of emergency declared by the state of Kentucky on March 6, 2020, the Lexington Housing Authority (LHA) proposes to allow interims for loss of income regardless if the household has had an interim in the last 12 months.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 18: Streamline HQS Inspection of LHA-Owned/Controlled Property**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

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

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 19: Tenant-Based Rental Assistance for Youth Aging Out of Foster Care**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval offer tenant-based vouchers to Foster Care youth (ages 18- 24) aging out Kentucky's foster care program. The LHA provides a maximum ten (10) tenant-based vouchers annually for youth aging out of foster care. LHA staff has established a partnership with the local Community Action Council (CAC), who receives referrals from the state Cabinet for Health and Family Services, to implement this initiative. The LHA has entered into a Memorandum of Understanding with CAC to supply vouchers to the Cabinet referrals and CAC provides the mandatory case management to the participant. The CAC staff interview, screen and enroll families for the program.

To date, four participants are housed through this program.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 20: Assign Project-Based Vouchers to LHA Owned/Controlled Units Without Bid Process**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval to select existing and new LHA owned/managed property for project-based voucher assistance without a competitive bid process. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project. The LHA may project-base its own new construction projects during FY2019 and this flexibility will have a positive impact for the agency and the clients we serve.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 21: Triennial Recertifications for HCV Homeownership Participants**i. Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2017

ii. Description/Update

The LHA received approval to implement reexaminations every three (3) years for Housing Choice Voucher (HCV) Homeownership households by conducting income reexaminations every three (3) years. Triennial recertification has proved successful for HCV elderly disabled on fixed incomes. Staff sees minimal changes in income for the homeownership households in the Housing Choice Voucher program. This

activity is ongoing. The elimination of these annual certifications has allowed for more time for HCV specialist to devote to other programs. The LHA currently has 30 homeownership participants.

iii. **Planned Non-Significant Changes**

In response to the COVID-19 (coronavirus) and the state of emergency declared by the state of Kentucky on March 6, 2020, the Lexington Housing Authority (LHA) proposes to delay triennial certifications as necessary until 12/31/2020..

iv. **Planned Changes to Metrics/Data Collection**

The LHA plans no changes to the metrics/data collection during the Plan year.

v. **Planned Significant Changes**

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 22: Rent Reform: Housing Choice Voucher Time Limit Pilot Program

i. **Plan Year Approved, Implemented, Amended**

Proposed, Approved and Implemented FY2018

ii. **Description/Update**

The Lexington Housing Authority received approval in the FY2018 Plan to test time-limited housing assistance for work-able new admissions to the HCV Program for five (5) years with a potential two (2) year extension. Elderly households are exempt from this activity.

Work-able new admission participants will be subject to:

- Total Tenant Payment (TTP) calculated based on 28% for work-able households
- A triennial recertification schedule
- Mandatory participation in LHA-provided case management
- Elimination of all deductions except childcare (elderly/disabled deduction, dependent deduction, medical expenses)
- Increases in income are excluded until the next certification
- Adult head of household, co-head or spouse must be employed at least 20 hours per week earning no less than local or federal minimum wage (whichever is higher); at least 25 hours per week employment beginning with their third year of program participation and at least 37.5 hours per week employment for the fourth and any subsequent year program participation.
- Should the participant not reach \$0 HAP at the end of five (5) years; the LHA will continue to provide rental assistance capped as follows:
 - 1 BR – \$200 maximum subsidy

- 2 BR – \$300 max subsidy
- 3 BR and over – \$400 max subsidy
- Minimum rent of \$150

At the close of FY2018 (June 30, 2018) the one voucher was issued but had not leased a unit. Currently, 15 participants are under lease and one is waiting to pass HQS inspection. The LHA's enrollment process pulls HCV applicants from the waiting list and calls those applicants in for an interview to determine their suitability for the program. Once an applicant is deemed suitable for the program the verification of eligibility begins. Seventy-five percent of applicants interviewed and selected for the eligibility process were terminated or withdrew prior to enrollment. Reasons applicants were not accepted to the program include, negative/unacceptable background checks, over-income and no shows for eligibility appointment.

iii. Planned Non-Significant Changes

In response to the COVID-19 (coronavirus) and the state of emergency declared by the state of Kentucky on March 6, 2020, the Lexington Housing Authority (LHA) proposes to delay triennial certifications as necessary through 12/31/2020.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 23: Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/Controlled Properties

i. Plan Year Approved, Implemented, Amended

Proposed and Approved FY2018, FY2018 Amendment Proposed in January 2018, Approved March 2018

ii. Description/Update

The LHA performs rent reasonableness determinations on all property owned or managed by the LHA. This initiative aims to eliminate the administrative work and cost of acquiring an independent entity to perform rent reasonableness determinations on LHA owned-controlled units. Eliminating the independent entity will improve administrative efficiencies, eliminate confusion for the voucher participant, and improves the response time for performing inspections. The LHA began using this authority upon approval and has experienced no issues since implementation.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activity 25: HCV – Allow Excluded Income to Make Units Affordable**i. Plan Year Approved, Implemented, Amended**

Proposed/Approved FY2020

ii. Description/Update

At the time initial occupancy, if the gross rent is greater than the payment standard for the family, the family's monthly share may not exceed 40% of the family's monthly adjusted income (MAI). The LHA's goal is to allow maximum resident choice in the voucher program by allowing the use of federally-mandated excluded income in determining unit affordability. Examples of excluded income are:

- Domestic Volunteer Services Act
- Workforce Investment Act of 1998
- Payments received for Foster Children or Foster Adults
- Kinship Guardian Assistance Payments (Kin-GAP)
- Adoption Assistance Payments in excess of \$480 per adopted child
- Developmental Disability Care Payments

The LHA's calculation of allowable rent burden uses gross income, including excluded income. Staff has determined that many times the gross rent is greater than the payment standard for the family and the MAI dictates that they are not eligible for a unit because of a rent burden beyond the 40% cap. Allowing the use of excluded income, the 40% rent burden cap would in most cases not be exceeded, and the household would be eligible for the unit.

iii. Planned Non-Significant Changes

The LHA has not planned any non-significant changes or modifications to this during the Plan Year.

iv. Planned Changes to Metrics/Data Collection

The LHA plans no changes to the metrics/data collection during the Plan year.

v. Planned Significant Changes

There are no plans to pursue a significant change to this MTW activity through an Annual MTW Plan amendment in the Plan Year.

Activities Not Yet Implemented

Activity #7: Public Housing Acquisition Without Prior Approval

Approval Dates: FY2012-2013 Plan

Description

Relief from HUD approvals prior to the acquisition of property will enhance LHA's ability to respond quickly to unique market conditions, making the Authority more competitive with other purchasers in the tight real estate markets typical of low poverty areas of the city. This relief will apply only to the acquisition of public housing units or vacant land purchased for the development of public housing units in non-impacted areas of the city.

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

- i. Update
The LHA did not acquire any public housing properties during where it was necessary to implement this activity.
- ii. Timeline for Implementation
The LHA will develop a timeline for this activity during FY 2020 should the Authority decide to acquire public housing units or land for the development of public housing.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved
The LHA does not anticipate any non-significant changes or modifications to this activity during FY2019.

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

Approval Dates: FY2012-2013 Plan, FY2014 (modified)

Description

Appian Hills needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site's 27 four-bedroom homes.

LHA continues to work diligently to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority.

- i. Update
Should HUD issue a NOFA during FY 2019 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds.
- ii. Timeline for Implementation
Once a plan for revitalization is agreed upon that includes the substitution of project-based vouchers for public housing subsidies, LHA will submit an appropriate application for disposition of the affected portion(s) of the site as well as a request for tenant protection vouchers for residents of affected units.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activity #9: Development of Project-Based Voucher Units at 800 Edmond St.

Approval Dates: FY2012-2013 Plan

Description

The flexibilities provided through this MTW activity will be used to project-base the units at Edmond Street without a competitive process and to exceed the per-building cap typically placed on project-based voucher developments.

- i. Update
The LHA still plans to implement this activity once financial resources become available.
- ii. Timeline for Implementation
The LHA will develop a timeline for this activity during the Plan year should the Authority decide to develop the Edmond Street property.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

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

Approval Dates: FY2012-2013 Plan, FY2014 (modified)

Description

Through its FY 2014 MTW Annual Plan, the LHA requested to retain the flexibility to use MTW funds should Ballard Towers (non-MTW units which are attached to an LHA-owned public housing site, Connie Griffith Towers, serving low-income, elderly households) require significant emergency capital repairs. MTW funds would only be used if the LHA does not have the financial resources to complete the repairs itself. Despite the number/extent of unforeseen capital emergencies that might arise, the LHA will provide Ballard Towers no more than \$300,000 in emergency funds in total.

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

- i. **Update**
Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a tax-credit entity until October 20, 2015 when the property exited tax credit compliance and is now solely owned by the Ballard, LLC, an LHA controlled entity. The LHA is weighing the possibility of Voluntary Conversion for Connie Griffith Towers and continues to seek a funding mechanism for Ballard Towers.
- ii. **Timeline for Implementation**
The LHA will develop a timeline for this activity during the Plan year should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.
- iii. **Explanation of any non-significant changes or modifications to the activity since it was approved**
The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.

Activity 24: Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/Controlled Units

Approval Date: FY2019

Description

The Lexington Housing Authority will eliminate the project-based voucher Choice Mobility option to offer assistance for families who elect to move after one year of occupancy in LHA-owned/controlled project-based voucher units (24 CFR 983.261). The LHA is mindful of the overwhelming need for affordable housing and sees the benefit of offering tenant-based rental assistance to families on the waiting list while continuing to assist families who are currently housed and receiving rental assistance in PBV units. This activity will aid in reducing a family's time on the waiting list. This activity does not apply to RAD units, reasonable accommodation instances or Violence Against Women (VAWA) cases.

- i. Update

The LHA currently does not own or control any project-based voucher (PBV units) that are eligible for this initiative. The LHA is considering conversion of public housing units that may allow for use of this initiative.
- ii. Timeline for Implementation

The LHA will develop a timeline for this activity during the Plan year should the Authority convert or acquire any PBV units.
- iii. Explanation of any non-significant changes or modifications to the activity since it was approved.

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

Activities on Hold

N/A

Closed Out Activities

Activity #2 - Management Team III Rent Reform Controlled Study – No Rent Reduction Requests for 6 Months After Initial Occupancy for Bluegrass HOPE VI Public Housing Residents (Closed out FY2014)

The implementation of this activity made no discernable impact on the percentage of Bluegrass HOPE VI public housing families meeting the self-sufficiency requirement. Staff reported that many families simply waited for the six-month restriction to expire, and then requested a rent reduction shortly thereafter. Given its negligible impact, the LHA decided to terminate this activity.

Activity #3 - Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households Approved Implemented FY2012-2013 Plan, Modified FY2014 (Closed out FY2018)

PIH Notice 2016-05 Streamlining Rule allows for all PHAs to adopt triennial recertifications. The LHA received approval to discontinue reporting on standard metrics for this activity in the MTW FY18 Plan.

Activity #4 - HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy (Closed out FY2015)

The implementation of this activity did not reduce the percentage of families requesting a rent reduction within 6 months of their effective move-in date. In fact, the percentage of families making such a request rose from 10% to 18% during FY2012 – FY2013. For those reasons, the LHA has decided to terminate this activity.

Activity #6 - Biennial Housekeeping Inspection Policy for Public Housing Residents (Closed out FY2014)

This activity was not implemented in FY 2012-FY2013 because it was determined that tracking the housekeeping ratings would require software modifications that would be cost prohibitive.

Activity #15 - Limit HCV Landlord Rent Increases to the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent Approved/Implemented FY2015 (Closed out FY2016)

HCV staff decided to close out this activity because the number of landlords requesting rent increases beyond above comparable rents or HUD's FMR was not as significant as initially anticipated. In many cases when a landlord's rent increase was denied the landlord withdrew the request as to not cause the tenant to have to move.

V. SOURCES AND USES OF MTW FUNDS

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$6,821,736
70600	HUD PHA Operating Grants	\$24,002,410
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$1,823,417
71100+72000	Interest Income	\$31,647
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$280,964
70000	Total Revenue	\$33,260,174

ii. Estimated Uses of MTW Funds

The MTW PHA shall provide the estimated uses and amount of MTW spending by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$4,662,475
91300+91310+92000	Management Fee Expense	\$1,823,417
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$0
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$1,932,574
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$3,729,540
95000 (95100+95200+95300+95500)	Total Protective Services	\$377,021
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$659,605
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$319,184
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$0
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$19,254,867
97400	Depreciation Expense	\$1,653,723
97500+97600+97700+97800	All Other Expense	\$469,111
90000	Total Expenses	\$34,881,517

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

Variance is Depreciation Expense budgeted surplus for year.

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
<p>The LHA will use single-fund fungibility by transferring excess cash reserves from Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/2019 per our audited report to be utilized for a number of projects. Those projects would include but not limited to: development of land adjacent to our recently development of 11 units at Glen Arvin Avenue; Ballard Towers, a senior designated high-rise that has been awarded 9% tax credits which may need additional funding for cost overruns related to the renovation; possible tax credit funding and source of funds to meet rehab needs for Connie Griffith Towers voluntary conversion from public housing to PBV. In addition, this flexibility may be necessary to take advantage of existing or new construction development opportunities as well as resident programs that promote self-sufficiency. Continued professional development of staff is important as demonstrated with our recent implementation of the Leadership Academy. The agency has begun a review of our entire portfolio to consider options under the asset repositioning plan to full advantage of our single-fund fungibility.</p>

B. LOCAL ASSET MANGEMENT PLAN

- i. Is the MTW PHA allocating costs within statute?
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)?
- iii. Has the MTW PHA provide a LAMP in the appendix?
- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

- i. **Description of RAD Participation**
 The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
N/A

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

VI. ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.

RESOLUTION TO APPROVE THE LEXINGTON HOUSING AUTHORITY’S FY 2020 MOVING TO WORK ANNUAL PLAN

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

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

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

WHEREAS, the LHA’s FY2019 MTW Annual Plan was approved by HUD on August 1, 2018, as submitted on July 24, 2018, effective through June 30, 2019; and

WHEREAS, LHA has proposed one new activity in the FY 2020 MTW Annual Plan that will serve to increase housing choices for low-income families ; and

WHEREAS, the LHA has re-proposed two previously approved MTW activities to increase housing choice for at-risk populations; and

WHEREAS, a Board Resolution approving the proposed FY 2020 MTW Annual Plan and required Certifications of Compliance that must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from March 11, 2019 through April 11, 2019 for the public to comment on the Plan, and has conducted a Public Hearing on March 26, 2019 to discuss the proposed Annual Plan before its submission to HUD,

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2020 MTW Annual Plan, effective July 1, 2019 through June 30, 2020, is approved, and that the Executive Director, Austin Simms, is hereby authorized to submit this Annual Plan and the required Certifications to the U.S. Department of Housing and Urban Development.



 Joan Whitman
 Chairperson, Board of Commissioners

_____ April 18, 2019
 Date

OMB Control Number: 2557-0216
Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2019), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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Expiration Date: 01/31/2021

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Lexington-Fayette Urban County Housing Authority

KY004

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Austin J. Simms

Executive Director

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

April 18, 2019

DATE

* *Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

B. DOCUMENTATION OF PUBLIC PROCESS

The beginning and end dates of when the Annual MTW Plan was made available for public review and the dates, location and number of attendees of public hearings must be provided. HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the Standard MTW Agreement (or successor MTW Agreement).



PUBLIC HEARING

You are welcome to attend; however, attendance is not mandatory.

TUESDAY, MARCH 26th, 2019 @ 5:30 PM

LHA CENTRAL OFFICE
300 W. NEW CIRCLE RD

SUBJECTS TO BE DISCUSSED:

- 1) PROPOSED FY 2019 MOVING TO WORK (MTW) ANNUAL PLAN
- 2) REVISIONS TO THE PUBLIC HOUSING ADMISSIONS & CONTINUED OCCUPANCY POLICY
- 3) REVISIONS TO THE HOUSING CHOICE VOUCHER (SECTION 8) ADMINISTRATIVE PLAN

Lexington-Fayette Urban County Housing Authority (LHA) Public Hearing Regarding: 1) Proposed FY 2020 Moving to Work (MTW) Annual Plan; 2) Revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP), and; 3) Revisions to the Housing Choice Voucher (Section 8) Administrative Plan.

There will be a public hearing on **Tuesday, March 26th, 2019 at 5:30 PM at LHA's Central Office**, located at 300 W. New Circle Rd, Lexington, Kentucky, 40505. The subject of the meeting will be the proposed FY 2020 MTW Annual Plan that includes one new activity and two re-proposed activities; proposed modifications to the Public Housing ACOP, and; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan.

The LHA welcomes public comment regarding these changes from March 11 –April 11, 2019. Complete copies of the affected documents (and a summary of proposed changes to each) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060.

Should you require transportation to the public hearing, please see your housing specialist or manager in advance to schedule.

Accommodations for disabled or non-English speaking residents will be made available upon advance request. Please call (859) 281-5063. Residents with hearing or speech impairments may receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

Lexington Herald-Leader
 Sunday, March 10, 2019

**Legals &
Public Notices**

**PUBLIC HEARING AND
ANNOUNCEMENT**

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) the proposed FY 2020 Moving to Work (MTW) Annual Plan; 2) revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP); and 3) revisions to the Housing Choice Voucher (Section 8) Administrative Plan, and; 4) revisions to the Public Housing Maintenance Fee Schedule. The public hearing will be held on Tuesday, March 26, 2019 at 5:30 PM at LHA's Central Office, located at 300 W. New Circle Rd., Lexington, KY 40505. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY 2020 MTW Annual Plan that includes one new activity and two re-proposed activities; proposed modifications to the Public Housing ACOP; proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan; and revisions to the Public Housing Maintenance Fee Schedule.

LHA welcomes public comment regarding these changes from March 11 - April 11, 2019. Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), are available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Andrea Wilson at LHA's Central Office or emailed to wilsona@lexha.org. For additional information, call (859) 281-5065. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service.

2019 (11/14)

**LHA Public Hearing
Sign-In Sheet
5:30 p.m. – Tuesday, March 26, 2019**

Name	Address	Email Address/Phone #
Cathy Hall	LHA	khallo@lexha.org
Andrea Wilson	LHA	wilsona@lexha.org
Candice Dill	LHA	fisher@lexha.org
Bill Ginn	LHA	ginnb@lexha.org
[Signature]	LHA	NoMISB@LEXHA.ORG
Aldice Pleasant	LHA	pleasant@lexha.org
SEAN COOPER	LHA	COOPER@LEXHA.ORG
Nicole C. Lee	LHA	leem@lexha.org
Dana Mason	LHA	masond@lexha.org
Austin Simms	LHA	simms@lexha.org
D. Perf...	LHA	



PUBLIC HEARING MEETING AGENDA
5:30 p.m. Tuesday, March 26, 2019
LHA Central Office Conference Room

- Introductions
- Overview
- Review of FY2020 MTW Annual Plan New Activities
- Review of ACOP/Admin Plan Revisions
- Review of Maintenance Fee Schedule for LHA-Owned/Controlled/Managed Properties
- Questions/Comment Period
- Adjournment

C. Planned and Ongoing Evaluations

Dr. Amanda Sokan leads oversight of the MTW program evaluation process, with an overall mandate to assess, monitor and report on the effects of the LHA's MTW initiatives. Dr. Sokan is an independent consultant, who is currently employed by the University of Arizona, College of Public Health, Community Environment & Policy Department. Dr. Sokan served as lead evaluator of the LHA's MTW program when the LHA entered the Demonstration in 2011. At that time, she was employed by Kentucky State University but has since left the university.

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

Rent Reform Study (Activity 16)

The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD.



LEXINGTON HOUSING AUTHORITY

Creating Affordable Housing Solutions

