



Lexington Housing Authority

MOVING TO WORK

ANNUAL PLAN

20 23

Submitted February 24, 2023

LHA Board of Commissioners

Joan Whitman, Chairperson
William Wilson, Vice Chairperson
Kimberly Scott, Commissioner
Janet Beard, Commissioner
Sally Hamilton, Mayor Linda Gorton's Designee

LHA Senior Staff

Austin Simms, Executive Director
Sean Cooper, Chief Financial Officer
Andrea Wilson, Chief Operating Officer
Michele Carman, Interim Accounting Manager
John Thompson, Director of Human Resources
Aldean Pleasant, HCV Manager
Tonya Christopher, Assistant HCV Manager
Cathy Hall, Housing Manager
Dana Mason, Housing Manager
Tom Smith, Facilities Manager
Rodes Perkins, Assistant Facilities Manager



TABLE OF CONTENTS

| | |
|--|-----------|
| Introduction | 1 |
| Short Objectives | 2 |
| Long-Term Objectives | 4 |
| II. General Operating Information | 7 |
| A. Housing Stock Information | 7 |
| B. Leasing Information | 9 |
| C. Waiting List Information | 10 |
| III. Proposed MTW Activities | 11 |
| IV. Approved MTW Activities..... | 17 |
| Activities Not Yet Implemented | 26 |
| Activities on Hold | 29 |
| Closed Out Activities | 29 |
| V. Planned Application of MTW Funds..... | 33 |
| VI. Administrative | 35 |
| Board Resolution | 36 |
| Certification of Compliance | 37 |
| Documentation of Public Process..... | 39 |
| Planned and Ongoing Evaluations | 42 |
| Disclosure of Lobbying Activities | 43 |
| Certification of Payments to Influence Federal Transactions | 44 |

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 the first 39 MTW agencies until 2028. Currently, 80 agencies participate in MTW. The submission of the FY2023 Annual MTW Plan marks the LHA's twelfth (12th) 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.

COVID-19 Update

As COVID-19 virus restrictions are gradually lifted, the virus continues to be a threat. LHA continued to be closed to walk-in visitors, however visitors are seen by appointment, while staff adheres to safety precautions when visitors are seen in person. Meetings are conducted virtually when possible and when meeting in person, social distancing and wearing masks are optional. Recertification of both public housing and Housing Choice Voucher clients continue to be conducted through phone interviews and mail.

Eviction Moratorium

In March of 2020, the eviction moratorium was enacted based on federal and state mandates to halt "no-fault" evictions and evictions for non-payment of rent for tenants who have incurred substantial income loss and/or substantial out-of-pocket medical expenses because of the COVID-19 pandemic. Later, the Center for Disease Control (CDC) mandated the moratorium to aid in stopping the spread of COVID-19. The CDC's mandate was challenged and struck down by the courts which officially ended the eviction moratorium October 4, 2021.

OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES

SHORT-TERM GOALS

Addressing Non-Payment of Rent

LHA has a housing stock of 914 public housing units, approximately 600 unassisted units and more than 3,500 Housing Choice Vouchers. Since March 2020 until October 2021, in response to the federal and state eviction moratorium LHA did not evict for nonpayment of rent or assessed late fees. The CDC's eviction moratorium order expired October 4, 2021. LHA applied for and received Emergency Rental Assistance (ERA2) funding through the Kentucky Housing Corporation to address program applicants' barriers to leasing a unit. These funds are intended to assist 'new admissions only' over three years with security deposits, utility deposits, utility arrearages, etc. Separate grant awards were received for public housing (\$217,181) and HCV (\$1,158,750). Clients are advised that funds are available to help households facing eviction with financial assistance through the state and local government. Lexington's city government has received more than \$9 million in federal dollars to assist households who cannot pay rent and utilities. LHA continues to encourage our clients to apply for the assistance to avoid eviction by sending notices promoting the assistance and helping clients complete the application process.

Emergency Housing Vouchers (Update)

The Lexington Housing Authority was notified by the HUD on May 10, 2021 of an award of seventy-six (76) Emergency Housing Vouchers (EHVs). The 76 vouchers are valued at \$621,780 in Housing Assistance Payment (HAP) (see EHV Policy in Appendix). The vouchers are provided to help assist individuals and families who are:

- homeless, at risk of homelessness or recently homeless
- fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

LHA has partnered with the Continuum of Care (CoC) program administered by the Lexington-Fayette Urban County Government's (LFUCG), Office of Homelessness Prevention and Intervention to administer the EHVs. The CoC contracted with the local Community Action Council, who will support individuals and families in completing applications and obtaining necessary supporting documentation to support referrals and applications for assistance, while aiding households in addressing barriers.

The LFUCG generously agreed to provide \$251,000 that will assist with security and utility deposits, utility arrearages and the landlord incentives. The following assistance will be provided on behalf of EHV clients:

- A one-time \$500 incentive to landlords that agree to lease their unit to an EHV family
- LHA will increase Payment Standards to 120% of FMR
- Minimum rent for EHV households will be \$0
- Furniture and essential household items based on specific need of the EHV family

Nationwide, 70,000 EHVs were awarded to 696 PHAs.

Development at Race and Third Street

Plans for a new development are in process for a vacant lot that will offer six rental townhouse units (fair market) at Race and Third Streets located in downtown Lexington. LHA received zoning approval in the fall of 2021 and an Invitation for Bid was published in March of 2022. This development is near the HOPE VI development (former Bluegrass-Aspendale). The new development is in an area that is currently undergoing revitalization with new residential and commercial opportunities. Bids came in well over budget and after discussion with LHA's legal representation, LHA made the decision to move from the regular bid process to a negotiation process, per LHA's Procurement Policy. A construction contract was executed in May 2022, with a completion date of September 2023.

Pemberton Development

LHA is also in the planning stages for a new development of five rental townhome units (fair market), on an additional vacant parcel of land, also located in downtown Lexington. LHA has received a commitment through a HOME-ARP application with the city of Lexington of approximately \$1million to fund this project.

Shropshire Avenue Development

LHA is in the planning stages to develop a final parcel of land that was left undeveloped following the demolition of LHA's Bluegrass Aspendale housing complex in the early 2000s. LHA proposes multiple uses for the vacant parcel of land that include eleven single family homes, four townhouse units and an early childhood prep academy. LHA has entered into an agreement with Community Action Council (CAC) to construct a Prep Academy on a portion of this parcel. They have secured approval from the Department of Health and Human Services (HHS), and Representative Andy Barr (KY) has committed \$3 million dollars toward the construction. CAC is seeking additional funding and a community partner to purchase and manage the childhood center.

Development at Versailles Road

Fifty-nine (59) units of affordable housing are planned for 1604 Versailles Road located in west Lexington. LHA purchased the property in September 2021. Plans for funding the construction of the units are pending. The property will be divided into 2 blocks - the north block from Versailles Road to Hill Rise Drive and the south block from Hill Rise Drive to Hill Rise Place. The north block will contain 12 apartment units, 23 townhouse units, 4 duplex units and 2 singlefamily houses. The south block will feature 18 duplex units with a 2-car driveway for each unit. Although the City Council person supports the plan, they are currently on hold due to opposition from the neighborhood. In the meantime, LHA continues to secure additional funding. When funding is secure, LHA anticipates 6 months for infrastructure and 24 months for construction to be complete. LHA continues to look for additional funding opportunities for affordable housing to replace our aging housing stock.

Connie Griffith and Ballard Fire Alarm Panel

The above reference project was originally bid on November 2, 2021, at which time the bids received exceeded the project estimate, which was \$300,000. Subsequent to the bid opening, bidders were contacted to determine the factors contributing to the price escalation. As a result of these contacts, proposed potential cost savings measures were proposed, to which LHA decided to rebid the project with the proposed measures incorporated. Upon rebid of the project, only a single bid was received which was higher than the original bid. The single bidder stated the increased bid price was due to cost escalations across the construction industry (wiring, conduit, fire alarm devices, etc.), labor shortage, and HUD's requirement, this year, to add carbon monoxide detection. LHA advertised the project again in January 2022. LHA received one bid that accepted and approved by the LHA Board in March 2022.

Staffing Issues

Issues related to hiring are ongoing for LHA. During the height of the COVID-19 pandemic hiring staff was challenging. Now that COVID concerns are beginning to ease, staffing continues to be a problem. In late 2021 LHA implemented an incentive for new hires that offered \$750 upon completion of the first six months of employment and another \$750 after a year of employment. LHA staff currently receive a \$500 referral fee for any applicant who accepts a position and completes the hiring process. It is taking several weeks from advertising a position to the offer. Some of the barriers include getting qualified applicants from the applicant pool, applicants who do not follow through at various stages of the process and some who do not show for the initial interview. The demand for higher pay is an ongoing concern and can only be addressed as the budget allows.

LONG-TERM GOALS

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; LHA has sought and received HUD approval to implement 30 MTW activities since entering the program in 2011. The following chart summarizes 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) | Closed Out FY2021 | 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 -FY2014 Significantly Modified | Modified in FY2014 - Pimlico Converted to PBV w/ RAD/Not Implemented | 3 |
| 9 | Development of Project-Based Voucher Units at 800 Edmond Street | FY2012- FY2013 | Not Implemented Resources used for RAD revitalization of Pimlico | 3 |
| 10 | HCV (Tenant-Based) Special Partners Programs | -FY2012- FY2013 -FY2014 Significantly Modified Modified FY2020 | Ongoing | 3 |

| | | | | |
|----|--|--|---|----------|
| 11 | Local, Non-Traditional Use of MTW Funds:Emergency Reserves for Connie Griffith- Ballard Towers | - FY2012- FY2013 -FY2014 Significantly Modified | Not Implemented until/ necessary foremergency capital repairs | 3 |
| 12 | Local, Non-Traditional Use of MTW Funds forHCV Special Partners With Designated Units | FY2014 Modified FY2020 | Ongoing | 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 theLesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent | FY2015 | Closed Out FY2016 | 1 |
| 16 | HUD/MDRC HCV Rent ReformDemonstration | FY2015 | Closed Out FY2021 | 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 | FY2019 FY2023 | Proposed Modification | 1 |
| 25 | HCV – Allow Excluded Income to Make Units Affordable | FY2020 | Ongoing | 3 |
| 26 | Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform) | FY2020 Amended Plan | Ongoing | 3 |
| 27 | HCV Portability Restrictions | FY2021 | Ongoing | 1 & 2 |
| 28 | HCV Alternate Certification Schedule | FY2021 | Ongoing | 2 |
| 29 | Contract Amendments to Remove or Add Units at LHA-Owned Project Based Voucher Units | FY2021 | Ongoing | 3 |
| 30 | Exclude Student Financial Aid from Income Calculation (HCV Participants) | FY2022 | Ongoing | 2 |
| 31 | Landlord Incentives | FY2023 | Proposed | 2 |
| 32 | HCV – Rent Reform for Elderly and Disabled Households | FY2023 | Proposed | 2 |

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

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

Planned Total Vouchers to be Newly Project-Based

0

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 |
| Connie Griffith Apts. | 101 | Complete | No | High rise apartments for 62 and over – voluntary conversion to PBV in FY2020 |
| | 307 | | | |

Planned Total Existing Project-Based Vouchers

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

iv. 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 |
|---|
| N/A |

v. 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 |
|--|
| KY004 PHA-Wide Operations \$401,729 |
| KY004 PHA-Wide Management Improvements \$188,401 |
| KY004 PHA-Wide Administration \$188,401 |
| KY004 PHA-Wide Fees & Costs \$300,000 |
| KY004000001 Back deck & stair replacement \$80,000 |
| KY004000002 Bathroom Renovation \$1,500,000 |
| KY004000003 Bathroom & Kitchen Renovation \$1,350,000 |
| KY004000006 Roof Replacement \$84,000 |
| KY004000007 Stairs Replacement \$50,000 |
| KY004000010, 11,13, 15, 33 Bluegrass Developments Stair Tread Replacement \$45,000 |
| Connie Griffith & Ballard New Fire Alarm Panel \$1,600,628 |
| Connie Griffith Energy Management System \$200,000 |
| Centre Meadows Roof Flashing Repair \$30,000 |

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 | 10536 | 878 |
| MTW Housing Choice Vouchers (HCV) Utilized | 30588 | 2549 |
| Local, Non-Traditional: Tenant-Based^ | 5232 | 436 |
| Local, Non-Traditional: Property-Based^ | 0 | 0 |
| Local, Non-Traditional: Homeownership^ | 0 | 0 |
| Planned Total Households Served | 46356 | 3863 |

* "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 | N/A |
| MTW Housing Choice Voucher | Connie Griffith Apartments (CGA) underwent voluntary conversion to PBV from public housing in January 2020. The current occupancy is 92.89% (170/183) of those occupied 101 are under PBV contract and 82 are tenant protection vouchers a result of voluntary conversion. |
| 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 | 2772 | Partially Open | Yes |
| Housing Choice Voucher | Community Wide | 790 | Closed | Yes |
| PBV | Centre Meadows | 1240 | Partially Open | Yes |
| PBV | Connie Griffith | 20 | Open | 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 |

PROPOSED MTW ACTIVITIES: HUD Approval Requested

| |
|--|
| Activity 31 – HCV - Rent Reform for Elderly and Disabled Households |
| A. Activity Description |
| <p>i. Proposed Activity Since 2014 LHA’s elderly and disabled households recertify every three years instead of annually. PIH Notice 2016-05 Streamlining Rule allowed all PHAs to adopt triennial recertifications. As the vast majority of elderly and disabled households in the HCV program rely on fixed-income sources, there is little variation in household income on an annual basis. LHA staff proposes to enact a simplified rent calculation for HCV elderly and disabled households. (Elderly and Disabled Households defined as - head, co-head or spouse is age 62 or older at the effective date of the certification or is disabled under HUD’s definition.) The policy will eliminate deductions from subsidy calculation and the total tenant payment will be determined by using 28% of gross income.</p> |
| <p>ii. Statutory Objectives the Proposed Activity will Achieve This activity will reduce costs and achieve greater cost effectiveness in federal expenditures.</p> |
| <p>iii. Schedule for Implementing the Proposed Activity The policy will take effect at the next regularly scheduled certification for current households and upon admission for all new households upon approval of the Plan.</p> |
| <p>B. Activity Metrics Information Data Source for Metric Data - LHA will collect data through staff interviews, internal reports from Emphasys computer software. HUD Standard Metrics for this activity will appear at the end of the activity.</p> |
| <p>C. Cost Implications Staff anticipates a savings on time that would have been spent to gather medical deductions and calculate the deductions. The simplified calculation will offer significant time savings.</p> |
| <p>D. Need/Justification for MTW Flexibility Attachment C, C. 11: The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, the utility reimbursements and tenant rent, and to adopt and implement any reasonable policies for setting rents in public housing including establishing definitions of income and adjusted income, or earned income disallowance, and Attachment C, D.2.a.: The Agency is authorized to adopt and implement any reasonable policies to establish payment standards, rents or subsidy levels for tenant-based assistance and to calculate the tenant portion of the rent that differ from the currently mandated program requirements</p> |
| E. Rent Reform/Term Limit Information (if applicable) |

| | |
|--|-----------------|
| i. IMPACT ANALYSIS | |
| Staff anticipates possible decrease in rent/tenant share but will monitor certifications of affected households. | |
| Impact Analysis | |
| Average Adjusted Income of Affected Households | \$12,065 |
| Average TTP of Affected Households | \$ 302 |
| Average Tenant Rent | \$ 42 |
| Average Gross Affected Households | \$13,019 |
| Average HAP of Affected Households | \$ 487 |
| Current Affected Households | 742 |
| ii. Hardship Case Criteria | |
| Rent burden will be reduced, no hardship is necessary. | |
| iii. Annual Reevaluation | |
| This activity will be monitored annually for unintended consequences and modified accordingly. | |
| iv. Transition Period | |
| Households who are currently affected will transition at the time of their next regularly scheduled recertification. All new households will be affected at the time of admission upon approval of the Plan. | |

HUD STANDARD METRICS -ACTIVITY 31

Activity 31 – HCV - Rent Reform for Elderly and Disabled Households

| Metric | Baseline | Benchmark | Outcome |
|--|---|---|---------|
| CE #1 - Total cost of task (decrease) | \$45 per certification to calculate deductions \$18 per hour x 2.5 hours | \$0 per certification to calculate deductions | TBD |
| CE #2 – Total time to complete the task in staff hours | 2.5 hours Time to calculate deductions | 0 hours | TBD |
| CE #3 – Average error rate in completing a task as a percentage (decrease) | 15% Errors in calculating deductions | 0 Errors | TBD |

III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

| Activity #32 – HCV Landlord Incentives |
|--|
| <p>A. Activity Description</p> <p>i. Proposed Activity</p> <p>LHA staff proposes to offer landlord incentives for the Housing Choice Voucher Program. In recent months staff has seen a decrease in participating landlords. Staff would attribute the decrease to post-pandemic trends in rent increases and lost revenue due to the eviction moratorium that have pushed landlords to raise rents beyond HUD’s Fair Market Rent. To address the decrease, LHA will:</p> <ul style="list-style-type: none"> • offer owner/landlord-self-certification for minor HQS fail items • offer vacancy payment to the landlord when a participant under lease passes away • provide lease up incentives up to \$3,500 to owners/landlords • change the payment standard to the current amount when a rent increase is approved by LHA and an interim change is processed due to a rent increase. <p>Owner Self-Certification of Corrected Minor HQS Deficiencies</p> <p>Units may fail an initial or biennial inspection due to minor items failing inspection. Inspectors must make a trip back to verify that minor items have been repaired. In units where no more than three minor deficiencies are found and the minor deficiencies are the only deficiencies in the unit, LHA may accept an owner’s certification that required deficiency corrections were made. If there are more than 3 minor deficiencies or are deficiencies in the unit that the inspector determines are not minor, then the inspector will return to inspect to ensure deficiencies are cured. The minor deficiencies will be determined by an approved list maintained by LHA.</p> <p>Vacancy Payment</p> <p>When the head of the household passes away and the head is the sole household member, LHA will provide a vacancy payment to the landlord (not to exceed one month of subsidy) if the head of household passes away or if it the household moves from the unit unannounced, without notice, or without LHA approval.</p> <p>Lease Up Incentives to Landlords</p> <p>Lease up incentives will include, landlord incentive, security deposit, application fees and utility deposits and utility arrears. A maximum of \$3,500 per applicant/participant will be provided to landlords on behalf of HCV applicants/participants to remove barriers in order to obtain and/or maintain permanent housing. LHA will offer an incentive of \$1,000 to landlords to lease a unit to an HCV applicant/participant. The payment will be made to the landlord once the unit passes inspection and the tenant occupies the unit. In addition, LHA will pay the security deposit not to exceed one month contract rent to the landlord once the unit passes inspection and the tenant occupies the unit. Application fees will be paid to the owner/landlord at the request of the landlord owner</p> |

| |
|---|
| <p>at the time of the application. Utility deposits and utility arrears will be paid directly to the utility company after the unit passes inspection. The maximum that will be paid on behalf of the applicant/participant will be \$3,500.</p> <p>LHA staff has created an owner/landlord self-certification form, along with a list of minor HQS deficiencies. The form and list are at the end of this activity.</p> |
| <p>ii. Statutory Objectives the Proposed Activity will Achieve</p> <p>By increasing and sustaining landlord participation, this policy will increase housing choice for HCV participants.</p> |
| <p>iii. Schedule for Implementing the Proposed Activity</p> <p>Upon approval of the Plan, LHA will offer these incentives in outreach efforts to attract new landlords and offer assistance to participants who face barriers to obtain and/or maintain permanent housing.</p> |
| <p>B. Activity Metrics Information</p> <p>Data Source for Metric Data - LHA will collect data through staff interviews, internal reports from Emphasys computer software. HUD Standard Metrics for this activity will appear at the end of the activity.</p> |
| <p>C. Cost Implications</p> <p>LHA staff anticipates that the retention of landlords and the ability for participants to have more choice for housing will far exceed any revenue loss for vacancy payments and landlord incentives. The landlord-certification for minor deficiencies should yield a cost savings when HCV inspectors are not inspecting for minor deficiencies. Outside resources will be utilized to assist with security and utility deposits and utility arrearages. LHA has included these costs in the 'Planned Application of MTW Funding' for MTW single-fund flexibility, utilizing HCV reserves as necessary.</p> |
| <p>D. Need/Justification for MTW Flexibility</p> <p>C.D.1.d. - The Agency is authorized to determine a damage claim and/or vacancy loss policy ad payment policy for occupied units that differs from the policy requirements currently mandated in the 1937 Act and its implementing regulations. Damage and vacancy authority are subject to state and local laws. <i>This authorization waives certain provisions of Section 8(o)(9), of the 1937 Act and 24 C.F.R. 982.311 as necessary to implement the Agency's Annual MTW Plan.</i></p> <p>C.D.1.5. - The Agency is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. <i>This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982, Subpart I as necessary to implement the Agency's Annual MTW Plan.</i></p> |

HUD STANDARD METRICS – ACTIVITY 32

| Metric | Baseline | Benchmark | Outcome |
|--|---|---|---|
| HC #1: Additional Units of Housing Made Available | Total amount of staff time dedicated to the re-inspection of minor HQS deficiencies prior to implementation of the activity (in hours). | Expected amount of staff time dedicated to the re-inspection of minor HQS deficiencies after implementation of the activity (in hours). | Actual amount of staff time dedicated to the re-inspection of minor HQS deficiencies after implementation of the activity (in hours). |
| | 180 hours per month 120 re-inspects per month for minor HQS deficiencies per month x 1.5 hours per inspection | 45 hours per month 30 re-inspects per month x 1.5 hours per inspection | TBD |

HQS Minor Deficiencies List

1. Missing drain plugs/sink stoppers
2. Missing screens
3. Non-working light bulbs
4. Missing shelf guard in refrigerator, if others are present to make the refrigerator usable
5. Doorbell button broken or missing
6. Storm door does not latch properly
7. The unit exterior entrance doors need weatherization
8. Minor caulking is needed
9. If one window lock is missing/broken, but another working lock present
10. Low water pressure
11. Exterior dryer vent cover
12. Small window crack if is not a cutting hazard
13. Missing cabinet door
14. Small roof eave repairs
15. Loose gutters (not falling off), missing gutter elbows, missing gutter splash blocks
16. A stove top 'burner-on' indicator light that does not go off
17. Lawn grass needing mowing
18. Small unfinished drywall repairs
19. Refrigerator handles
20. Refrigerator light bulb not illuminating
21. Minor Slow drain in sink, tub, toilet, etc.



OWNER'S SELF- CERTIFICATION OF MINOR VIOLATIONS

| | | | |
|-----------------------|--|----------------|--------------------------------|
| Owner Name/Company | | Tenant Name | |
| Address | | Unit Address | |
| Address | | Unit Address | |
| City, State, Zip Code | | City/State/Zip | Lexington, KY _____ (zip code) |

The inspection for your unit at _____ failed inspection on _____ (date) due to minor violations. LHA has implemented the policy to allow the property owner/representative to self-certify that minor violations have been cured instead of scheduling another onsite inspection.

When the violation(s) listed below are repaired, please complete this form, and return to the inspector. Upon receipt of the self-certification, we will pass the unit the date that the violations were corrected. If this was an initial inspection and this form is not returned to our office within seven (7) business days from the date of this notice, the inspector will fail the unit and the participant will be issued another Request for Tenancy Approval to find another unit. Housing Assistance Payments (HAP) will not begin for an Initial Inspection until the unit is 'Passed.' If later, it is determined that the self-certified violation(s) were not corrected, LHA will recoup any payments made for the unit in which the unit was not in HQS compliance.

If this is an Annual or Complaint inspection and the self-certification form is not returned within seven (7) days, the inspector will schedule an onsite inspection.

Note: Within 90 days of the passed inspection, this unit can randomly be selected for a Quality Assurance Inspection.

| | Violation(s): | Date Corrected: |
|---|---------------|-----------------|
| 1 | | |
| 2 | | |
| 3 | | |

Owner/Representative Name: _____

Owner/Representative Address: _____

Owner/Representative Phone Number: _____

Owner/Representative Email Address: _____

Owner/Representative Signature

Date

WARNING: Section 1001 of Title 18 of the U.S. Code provides, that whoever knowingly and willingly makes or uses a document of writing containing any false, fictitious, or fraudulent statements or entry, in any matter within the jurisdiction of any Department or Agency of the United States, shall be fined not more than \$10,000.00 or imprisoned for not more than five years, or both.

FOR OFFICE USE ONLY BELOW THIS LINE

Staff Approval _____

Date

Created 7/2022

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity #1: Increase Minimum Rent to \$150 Across All Housing Programs | |
|---|--|
| Plan Year Approved, Implemented, Amended | Proposed FY2012-2013 / Implemented 5/1/2012 / Modified FY2014/Implemented 4/1/2014 |
| 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. The initiative promotes self-sufficiency by encouraging heads-of-household to work, while raising much-needed revenue. This activity is ongoing. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #10: Housing Choice Voucher Tenant-Based Special Partner Programs | |
|--|---|
| Plan Year Approved, Implemented, Amended | Proposed FY2014/Modified FY2020 |
| 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. The LHA currently provides voucher assistance to a maximum of 32 participants for: New Vista, Community Action Council, Arbor Youth Services and Natalie's Sister. This activity is ongoing and 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 through the Authority's normal application procedures. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity #12: Local, Non-Traditional Use of MTW Funds for Special Partners | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2014 |
| Description/Update | The Housing Authority provides monthly rental subsidy to eight (8) special partners who have agreed to house and provide wraparound social services to a minimum of 436 families with special needs. These agencies serve individuals with mental illness and/or substance abuse issues; individuals recently released from prison or jail; families in need of financial literacy, credit management, and homeownership resources; single parents enrolled full-time in higher education; and homeless individuals and families. During fiscal year 2021, 695 families were served and monthly \$13,400 in voucher funding went to the participating providers. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #13: Local Self-Sufficiency Admissions and Occupancy Requirements (Rent Reform) | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed/Approved - FY2014 / Technical Amendment 1/14/2016 |
| Description/Update | The Housing Authority Impose a minimum earned income calculation for work able, non-elderly, non-disabled families, including full-time students, residing at self-sufficiency units or Centre Meadows regardless of employment status. This activity is ongoing. Many households were affected by the pandemic, resulting in loss of income due to layoffs or substantial cut in hours. The imputed income calculation was suspended for households who lost employment due to COVID-19. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity #14: Rent Reform: Elimination of Earned Income Disallowance (Rent Reform) | |
|--|---|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2015 |
| Description/Update | This activity eliminates the Earned Income Disallowance (EID) calculation for public housing and HCV households. Monitoring the family members who receive the EID calculation from hire date through 48 cumulative months was difficult to track because households don't always report when employment status starts and stops. In addition, many who received the benefit quit their jobs at the end of the two-year exclusion to avoid an increase in the household rent. For those reasons and the administrative burden, the LHA proposed to eliminate the EID calculation. Only two households of the total of 23 who received EID at the start of this activity remain in LHA housing programs. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #17: Rent Reform: Limit Interim Re-Examinations for Public Housing Households (Rent Reform) | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2016 |
| Description/Update | <p>Interim reductions in the rent portion are limited to one per household between regularly scheduled re-examination periods. For households who are not elderly or disabled, interim adjustments are limited as follows:</p> <ul style="list-style-type: none"> • Households may only request an interim reduction once between regularly scheduled re-examination periods. • Interim decreases will only be processed for loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance or separation benefits. • In calculating the reduction, all household income, including previously unreported income, is counted. • The household's loss of income must be expected to last longer than four (4) months. • All interim rent reductions are temporary. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| | |
|--|--|
| | <ul style="list-style-type: none"> An exception to this policy allows for an interim at any time for compliance in 50058 reporting and is limited to the following: the addition of a household member, the death or removal of a household member. This activity was suspended April 2020 through October of 2021 to help those households affected by the pandemic. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #21: Triennial Certifications for HCV Homeownership Participants (Rent Reform) | |
|---|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2017 |
| Description/Update | LHA staff implemented this activity to reduce the administrative burden of annual certifications for Homeownership households by conducting income reexaminations every three (3) years. In FY2021, 29 households were homeownership participants. This activity is ongoing. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity #22: Triennial Certifications for HCV Homeownership Participants (Rent Reform) | |
|---|---|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2018 |
| Description/Update | The LHA's Time Limit Pilot program for HCV new admissions entered its fourth year of implementation in 2022 with 18 participants. The Pilot Program aims 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. Participants affected by this policy must work a minimum of 20 hours per week; TTP is calculated based on 28% of adjusted income; triennial recertification, with increases in income excluded until the next certification and mandatory participation in LHA-provided case management. Elderly households are exempt from this activity. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this 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 | |
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2018 / Amended January 2018 / Implemented March 2018 |
| 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 improves administrative efficiencies, eliminates confusion for the voucher participant, and improves the response time for performing inspections. The LHA has experienced no issues with this activity since implementation. This activity is ongoing. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity 24: Elimination of Project-Based Voucher Choice Mobility at LHA-Owned/Controlled Units | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2019 |
| Description/Update | The Lexington Housing Authority eliminated 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. Currently the 100 PBV leased units at Connie Griffith Apartments are affected by this activity. This activity does not apply to RAD units, reasonable accommodation instances or Violence Against Women (VAWA) cases. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #25: HCV – Allow Excluded Income to Make Units Affordable | |
|---|---|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2018 / Amended January 2018 / Implemented March 2018 |
| Description/Update | <p>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.</p> <p>The LHA's calculation of allowable rent burden will use 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. HCV staff reports that this activity has made it possible for several participant households to lease the unit they choose by exercising this authority.</p> |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #26: Rent and Eligibility Protections for Households Affected by Voluntary Conversion at Connie Griffith Apartments (Rent Reform) | |
|---|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2020 / Amended 2020 |
| Description/Update | LHA's Connie Griffith Apartments (CGA) (a 183-unit elderly building) underwent voluntary conversion from a public housing to Section 8 vouchers. HUD provided tenant protection vouchers to all CGA resident households at the time of conversion and to replace vacant units and one unit containing a household that was over-income for HCV. The CGA households may use their HCV at CGA or to move elsewhere. CGA tenants were concerned that they were being forced to move or that their rent was going to increase. This activity provides residents of the CGA rent and eligibility protections post- conversion that they would not have under the HVC program. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |

| | |
|--|---|
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #27: HCV Portability Restrictions | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed / Implemented - FY2021 |
| Description/Update | Through approval of this activity, LHA limits portability for workable HCV participants to encourage self-sufficiency and serve more families. Incoming and outgoing portability requests are considered on a case-by-case basis but generally are allowed for reasons related to employment, educational opportunities, medical/health reasons or other extenuating family circumstances. This activity is ongoing. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

| Activity #29: Contract Amendments to Remove or Add Units at LHA-Owned Project-Based Voucher Units | |
|--|--|
| Plan Year Approved, Implemented, Amended | Proposed/Implemented - FY2021 |
| Description/Update | This activity allows LHA to add previously removed contract units back to the HAP contract (due to an increase in a tenant's income), should the family have a decrease in income that causes HAP to resume at any point during the family's tenancy of a PBV unit. This activity was helpful for households affected by COVID-19 because of employment loss or reduction in hours. This policy afforded families some relief due to the crisis. This activity is ongoing. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

| Activity #30: Exclude Student Financial Aid from Income Calculation (HCVParticipants) | |
|---|---|
| Plan Year Approved, Implemented, Amended | Proposed/Implemented - FY2022 |
| Description/Update | Currently any financial aid assistance for Housing Choice Voucher Participants in excess of amounts received for tuition that an individual receives under the Higher Education Act of 1965 from private sources, or from an institution of higher education is considered income to that individual. Persons over the age of 23 with dependent children may exclude all financial assistance from income. LHA proposes to exclude financial aid assistance that exceeds tuition for all adult full-time students to align with the public housing program that excludes the full amount of financial aid assistance for students unless it is an athletic scholarship that includes assistance available for housing costs and that portion is included in income. LHA staff reports no problems with this activity. |
| Planned Non-Significant Changes | LHA has not planned any non-significant changes or modifications to this activity during the Plan year. |
| Planned Changes to Metrics/ Data Collection | No changes are planned to the metrics/data collection during the Plan year. |
| Planned Significant Changes | There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year. |

B. Not Yet Implemented Activities

| Activity #7: Public Housing Acquisition Without Prior Approval | |
|--|---|
| Approval Dates: FY2012-2013 Plan | |
| Description | <p>This relief this activity will provide applies 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.</p> <p>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.</p> |
| Update | The LHA does not anticipate acquiring any public housing properties during FY2023 where it was necessary to implement this activity. |
| Timeline for Implementation | The LHA will develop a timeline for this activity during FY2023 should the Authority decide to acquire public housing units or land for the development of public housing. |
| Explanation of any non-significant changes to the activity since it was approved. | The LHA does not anticipate any non-significant changes or modifications to this activity during FY2023. |

| Activity #8: Conversion of Appian Hills Public Housing to Project-Based Vouchers | |
|--|--|
| Approval Dates: FY2012-2013 Plan, FY2014 (modified) | |
| Description | <p>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.</p> <p>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.</p> |
| Update | Should HUD issue a NOFA during FY 2023 that would aid in the redevelopment of Appian Hills, LHA may apply for these funds. |
| 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. |
| Explanation of any non-significant changes to the activity since it was approved. | The LHA does not anticipate any non-significant changes or modifications to this activity during FY2023. |

| | |
|--|--|
| 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. |
| Update | The LHA plans to implement this activity once financial resources become available. |
| 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. |
| Explanation of any non-significant changes 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 | <p>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.</p> <p>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.</p> |
| 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 successfully completed renovation of 134 apartments in FY2020. |

| | |
|--|---|
| 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 use of the MTW emergency reserves |
| Explanation of any non-significant changes to the activity since it was approved. | The LHA does not anticipate any non-significant changes or modifications to this activity during FY2023. |

A. Activities on Hold

N/A

B. 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 5: Streamlined HQS Inspection Policy for Housing Choice Voucher Program Plan Year Approved, Implemented, Amended Activity Proposed FY 2012 – FY 2013 Plan /Significantly Modified FY2014 Plan/Implemented FY2015 (Closed out FY2021)

The LHA chose to close out this activity allowing Housing Quality Standards (HQS) inspection intervals between 12 months and 36 months based on a landlord's star-rating. LHA staff feels that since the enactment of PIH-Notice 2016-05 Streamlining Administrative Regulations for Programs Administered by Public Housing Agencies allowing for biennial inspections and the use of alternative inspection methods and inspection timeframes, this activity is no longer necessary. The majority (91%) of LHA's 800+ HCV landlords were assigned to the 2-star rating of every two years, therefore, staff felt that the initiative was no longer necessary.

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.

Activity 16: HCV Rent Reform Study Approved, Implemented, Amended – FY2015

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. The Study concluded June 30, 2021 (FY2021). Researchers conducted a final close out survey to Study participants during 2021. Results of that survey were not released to the Housing Authority. A final report was scheduled for 2022 but has not yet been released. The policy substituted triennial recertification of a households' income for annual recertification, and it was not necessary for study group participants to report increases in income. LHA received approval in FY2021 MTW Annual Plan (amended) to continue many of the policies from the Study in Activity 28 – HCV Alternate Certification Schedule.

(V) PLANNED APPLICATION OF MTW FUNDS

ANNUAL MTW PLAN

A. PLANNED APPLICATION 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.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS).

| FDS LINE ITEM NUMBER | FDS LINE ITEM NAME | DOLLAR AMOUNT |
|---------------------------------------|--|---------------|
| 70500 (70300+70400) | Total Tenant Revenue | \$7,072,092 |
| 70600 | HUD PHA Operating Grants | \$30,831,851 |
| 70610 | Capital Grants | \$300,000 |
| 70700 (70710+70720+70730+70740+70750) | Total Fee Revenue | \$2,121,676 |
| 71100+72000 | Interest Income | \$50,939 |
| 71600 | Gain or Loss on Sale of Capital Assets | 0 |
| 71200+71300+71310+71400+71500 | Other Income | \$340,020 |
| 70000 | Total Revenue | \$40,716,578 |

ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

| FDS LINE ITEM NUMBER | FDS LINE ITEM NAME | DOLLAR AMOUNT |
|---|--|---------------|
| 91000 (91100+91200+91400+91500+91600+91700+91800+91900) | Total Operating - Administrative | \$5,838,949 |
| 91300+91310+92000 | Management Fee Expense | \$2,121,676 |
| 91810 | Allocated Overhead | |
| 92500 (92100+92200+92300+92400) | Total Tenant Services | |
| 93000 (93100+93600+93200+93300+93400+93800) | Total Utilities | \$2,131,259 |
| 93500+93700 | Labor | |
| 94000 (94100+94200+94300+94500) | Total Ordinary Maintenance | \$4,629,659 |
| 95000 (95100+95200+95300+95500) | Total Protective Services | \$347,956 |
| 96100 (96110+96120+96130+96140) | Total Insurance Premiums | \$617,369 |
| 96000 (96200+96210+96300+96400+96500+96600+96800) | Total Other General Expenses | \$306,901 |
| 96700 (96710+96720+96730) | Total Interest Expense & Amortization Cost | |
| 97100+97200 | Total Extraordinary Maintenance | |
| 97300+97350 | HAP + HAP Portability-In | \$25,099,507 |
| 97400 | Depreciation Expense | \$1,974,970 |
| 97500+97600+97700+97800 | All Other Expense | \$13,256 |
| 90000 | Total Expenses | \$43,081,502 |

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

Variance is depreciation expense and shortage to be covered by reserves

iii. Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs’ funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. 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 funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

During Plan FY2023 LHA will use MTW single fund fungibility by transferring excess cash reserves between Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/22 per our audited report to be utilized for several projects. LHA staff have identified a number of development projects, capital needs and programmatic initiatives that exceed current capital and operating funds. The following items are in progress or in the planning stages for single fund authority:

- Development of 1604 Versailles Road – 56 low-income housing units
- Construction in progress of six townhouse units at Third & Race
- Development of single-family homeownership and affordable rental units at Pemberton (offering builder incentives as well as innovative construction and finance methods)
- Development of an early childhood prep academy
- Contingency funding for locally pledged housing stability services
- Funding to address COVID-19 related LHA staffing issues and incentives to attract and maintain our workforce
- Support the efforts of initiatives to attract new HCV owners/landlords and incentives to secure and maintain permanent housing for program participants

(IV.) PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

| Original Funding Source | Beginning of FY - Unspent Balances | Planned Application of PHA Unspent Funds during FY |
|-------------------------|------------------------------------|--|
| HCV HAP* | \$15,857,462 | \$ |
| HCV Admin Fee | \$24,441 | \$ |
| PH Operating Subsidy | \$854,501 | \$ |
| TOTAL: | \$16,736,404 | \$ |

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA’s appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30th and end-of-year at December 31st. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at:

https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide_vJuly2020.pdf.

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

* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

** HUD’s approval of the MTW Plan does not extend to a PHA’s planned usage of unspent funds amount entered as an agency’s operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

(V). 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.

(VI). 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 |
|---|
| <p>The Lexington Housing Authority (LHA) applied for participation in the United States Department of Housing & Urban Development's (HUD) Rental Assistance Demonstration in October of 2012. On December 14, 2012, the LHA was notified of approval of the application for conversion of 206 public housing units at Pimlico Apartments to Project Based Vouchers (PBV). LHA fulfilled its obligation to remove 206 dwelling units from KY004000012 Pimlico Apartments in the Inventory Management System / PIH Information Center (IMS/PIC) which were converted to RAD Project Based Vouchers. The dwelling units consisted of the following: 44 one-bedroom units, 128 two-bedroom units, and 34 three-bedroom units. LHA acknowledges that the removal of the identified units from IMS/PIC was a material requirement and condition of HUD's approval of its Rental Assistance Demonstration (RAD) application for the project.</p> <ul style="list-style-type: none">• <i>RAD Conversion Commitment 2nd Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</i>• <i>RAD Conversion Commitment Final Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</i>• <i>RAD Post-Closing Corrective Amendment issued by HUD on April 5, 2018</i> <p>The renovated site is now known as Centre Meadows with rents subsidized by HCV (Housing Choice Voucher PBV) assistance. Renovation began March 4, 2014 and by June 30, 2016 the overall project was 100% complete and all 206 dwelling units are being leased & occupied.</p> |

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?

(VI) ADMINISTRATIVE

ANNUAL MTW PLAN

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 2023 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 FY2022 MTW Annual Plan was approved by HUD on January 25, 2022, 2020, as submitted on January 25, 2022, effective through June 30, 2022; and

WHEREAS, LHA has proposed two new activities and revised one ongoing activity in the FY 2023 MTW Annual Plan that will serve to do one or more of the following, increase housing choice for low-income families, encourage self-sufficiency or reduce cost; and

WHEREAS, a Board Resolution approving the proposed FY 2023 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 July 18, 2022, through August 18, 2022, for the public to comment on the Plan, and has conducted a Public Hearing on July 28, 2022, 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 2023 MTW Annual Plan, effective July 1, 2022, through June 30, 2023, 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

August 18, 2022
Date

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 Chair 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 (07/01/2022), 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI), Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents 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 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (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 identity, or marital status.
- (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 75.
- (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.
- (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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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.

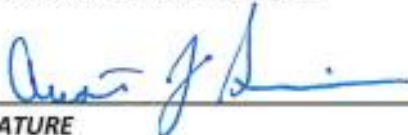
Lexington-Fayette Urban County Housing Authority
MTW PHA NAME

KY004
MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Austin J. Simms
NAME OF AUTHORIZED OFFICIAL

Secretary, LHA Board of Commissioners
TITLE


SIGNATURE

8/18/2022
DATE

* Must be signed by either the Chair 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 Chair 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).



Lexington Herald-Leader
Sunday, July 17, 2022

Legals

PUBLIC HEARING ANNOUNCEMENT

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: 1) the proposed FY2023 Moving to Work (MTW) Annual Plan; 2) revisions to the Housing Choice Voucher (Section 8) Administrative Plan; 3) revisions to the Public Housing Admissions and Continued Occupancy Policy, and; 4) the revised Fee Schedule.

The public hearing will be held on **Thursday, July 28, 2022 5:30 PM** via Zoom video conferencing. Attendees may register in advance by calling Andrea Wilson at (859) 281-5060. Accommodations for disabled or non-English speaking persons will be made available upon advance request. The subject of the meeting will be the proposed FY2023 MTW Annual Plan that includes two new activities and modification to one activity related to the Housing Choice Voucher (HCV/ Section 8) program, proposed revisions to the HCV Administrative Plan and Admissions and Continued Occupancy Policy that governs the Public Housing program and revisions to the LHA Fee Schedule.

Specifically, two new activities and two modified activities to be discussed are:

New Activity – Activity #31 – Landlord Incentives

New Activity – Activity 32 – HCV – Eliminate Deductions for Elderly and Disabled

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

LHA welcomes public comment regarding these changes from Monday, July 18 through August 18, 2023. Complete copies of the affected documents 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 300 W. New Circle Road, Lexington, KY 40505 or emailed to wilsona@lexha.org. For additional information, call (859) 281-5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service. Equal Housing Opportunity IPL0081786 Jul 17 2022



**LHA Public Hearing Agenda
Thursday, July 28, 2022
5:30 p.m.**

| | |
|--|------------------------|
| Welcome/Overview of Public Hearing | <i>Michele Lee</i> |
| Overview of FY 2023 New MTW Activities | <i>Michele Lee</i> |
| Activity #24 - Elimination of Project-Based Voucher Choice Mobility at LHA Owned/Controlled Units | <i>Aldean Pleasant</i> |
| Activity #31 – HCV - Rent Reform for Elderly and Disabled Households | <i>Aldean Pleasant</i> |
| Activity #32 – HCV Landlord Incentives | <i>Aldean Pleasant</i> |
| Review ACOP Modifications | <i>Andrea Wilson</i> |
| Review Admin Plan Modifications | <i>Andrea Wilson</i> |
| Review of Fee Schedule Revisions | <i>Sean Cooper</i> |
| Questions/Comments | |
| Adjournment | |



Lexington Housing Authority

**LHA Public Hearing Attendance Sheet
Thursday, July 28, 2022**

**Sean Cooper
Chief Financial Officer**

**Renee Christian
Housing Manager**

**Cathy Hall
Housing Manager**

**Michele Lee
Contracts, Grants and MTW Manager**

**Dana Mason
Housing Manager**

**Andrew Merrill
Housing Manager**

**Aldean Pleasant
Section 8 Manager**

**Austin Simms
Executive Director**

**Tania Whitfield
LHA Resident**

**Joan Whitman
LHA Board Chair**

**Andrea Wilson
LHA Chief Operating Officer**

The Public Hearing was held on Thursday, July 28, 2022 via Zoom Video Conferencing.

Zoom recording information:

https://us02web.zoom.us/rec/share/ntD0481OajqysFLeHX6X16NFkS_h0M-E3GuqcZsSi0fU6CcatEmWb2zelKoy_TW3.GePbC_bVhAH7C5It

Passcode:867i&z*q

Per the agenda, LHA staff went through the proposed activities and no comments were received concerning the FY2023 MTW Annual Plan.

Lexington Housing Authority

C. PLANNED AND ONGOING EVALUATIONS

The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).

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.

D. LOBBYING DISCLOSURES

The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).

Approved by OMB
0348-0046

Disclosure of Lobbying Activities

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure)

| | | |
|--|--|--|
| <p>1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance</p> | <p>2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award</p> | <p>3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For material change only: Year <input type="text"/> quarter <input type="text"/> Date of last report <input type="text"/></p> |
| <p>4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier <input type="text"/>, if Known: Congressional District, if known: <input type="text"/></p> | <p>5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime: Congressional District, if known: <input type="text"/></p> | |
| <p>6. Federal Department/Agency: Congressional District, if known: <input type="text"/></p> | <p>7. Federal Program Name/Description: OIA Number, if applicable: <input type="text"/></p> | |
| <p>8. Federal Action Number, if known: Congressional District, if known: <input type="text"/></p> | <p>9. Award Amount, if known: \$ <input type="text"/></p> | |
| <p>10. a. Name and Address of Lobbying Restraint (if individual, last name, first name, MI): Congressional District, if known: <input type="text"/></p> | <p>b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Congressional District, if known: <input type="text"/></p> | |
| <p>11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</p> | <p>Signature: <input type="text"/> Print Name: <input type="text"/> Title: <input type="text"/> Telephone No.: <input type="text"/> Date: <input type="text"/></p> | |
| <p>Federal Use Only</p> | <p>Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)</p> | |

NOT APPLICABLE

**Certification of Payments
to Influence Federal Transactions**

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Lexington-Fayette Urban County Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-L.L.L., Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official

Austin J. Simms

Title

Executive Director

Signature

Date (mm/dd/yyyy)

8/18/2022

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3



Lexington Housing Authority

MOVING TO WORK

ANNUAL PLAN

20
23

Submitted August 18, 2022