



Lexington Housing Authority

MOVING TO WORK

ANNUAL PLAN FY2024

20

24

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I. INTRODUCTION

The Lexington-Fayette Urban County Housing Authority (LHA) submitted a formal application to the federal U.S. Department of Housing and Urban Development (HUD) seeking admittance to the Moving to Work (MTW) demonstration program in November 2010. HUD announced LHA's selection for program admittance in March 2011, and the Housing Authority formally entered the MTW program on November 10, 2011, with the execution of an MTW Agreement between HUD and LHA. In April 2016, HUD extended the agreements of the first 39 MTW agencies until 2028. Currently, 126 agencies participate in MTW with 87 new agencies entering the program under the MTW expansion. The submission of the FY2024 Annual MTW Plan marks LHA's thirteenth (13th) year in the Demonstration.

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

OVERVIEW OF SHORT-TERM AND LONG-TERM 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. During 2022, there were 51 evictions from LHA owned/managed properties and 42 HCV terminations. Lexington's city government has received more than \$40 million in federal dollars to assist households who cannot pay rent and utilities. LHA continues to encourage our clients to apply for assistance to avoid eviction by sending notices promoting the assistance and helping clients complete the application process. In addition, LHA continues to seek funding sources to meet the need.

Race on Third -Six Townhomes Development and Third Street

This development, near our most recent HOPE VI development, consists of six (6), two -bedroom, 2-1/2 bath, townhouse apartments. Each unit has covered front porch and patio, off-street parking, and additional interior upgrades. This new development is in an area that is currently undergoing revitalization with new residential and commercial opportunities. Construction is currently ahead of schedule, although the original completion date is September 2023.

Pemberton Townhomes Development

This new development of five rental townhome units (fair market), on an additional vacant parcel of land, also located in downtown Lexington, has started with the execution of a construction contract. LHA has received a commitment through a HOME-ARP application with the city of Lexington of approximately \$1 million to fund this project. The contract completion date is September of 2023.

Shropshire Avenue Development

Development is currently underway on the 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. CAC has 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.

The property is located in Lexington's East End neighborhood, an area that is undergoing a resurgence. The site of the planned development has been vacant for several years following the demolition and subsequent HOPE VI redevelopment of the LHA's largest public housing site (Bluegrass-Aspendale) in 2005. This development is the final piece to a much larger development initiative. The homeownership development is in close proximity to the LHA's planned \$1.5 million, 5-unit townhome rental development, a planned \$3 million child care development center as well as a \$750,000 new street (currently under construction) for rear-entry access to the proposed homeownership houses and child care center. LHA has received the support and most importantly financial backing of LFUCG to complete the aforementioned projects currently underway.

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 single-family houses. The south block will feature 18 duplex units with a 2-car driveway for each unit. Although the District City Councilmember supports the plan, neighborhood opposition to the development has stalled the project. When funding is secure, LHA anticipates six 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.

ROSS Service Coordinator International Book Project Partnership

The Lexington Housing Authority's Resident Opportunity and Self-Sufficiency (ROSS) Program strives to locate supportive services from community agencies and partner with them to address our clients' needs. One such successful collaboration this year has been with the International Book Project (IBP).

The IBP, based in Lexington, KY, collects, sorts, and ships books in response to requests globally. Their goal is to promote literacy in underserved areas of the world, both domestic and abroad, with the understanding that literacy is crucial to empowering individuals and providing opportunity.

In 2022, to champion learning in the home, children of three ROSS families received their own private libraries as the result of the IBP's generosity. These libraires included 100 books per family, handpicked by staff based on personal interest, and a bookshelf for storage. Children could keep what was given, exchange any of the books for free or redeem a \$25 International Book Project bookstore credit. We hope that many

more families get to participate in this educational and fun experience in 2023.

ROSS also investigated ways to support financial literacy through digital means. To encourage this objective, IBP supplied 25 Amazon Kindles to award to those clients who completed the FDIC's Money Smart program, a financial education series aimed at helping people of all ages enhance their financial skills and create positive banking relationships. The Kindles are preloaded with a series of books focused on establishing and completing self-sufficiency goals, along with a public library app and card to allow access to even more material. More Kindles are on the way in 2023 to allow any public housing resident who joins ROSS to take advantage of these purposeful resources. ROSS and IBP are thrilled at what has been achieved so far but are even more enthusiastic at what is to come!

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 32 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	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	3
12	Local, Non-Traditional Use of MTW Funds for HCV 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 the Lesser of 2%, the HUD Fair Market Rent (FMR) or Comparable Rent	FY2015	Closed Out FY2016	1
16	HUD/MDRC HCV Rent Reform Demonstration	FY2015	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 Propose closeout	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	Ongoing	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	HCV – Rent Reform for Elderly and Disabled Households	FY2023	Ongoing	2
32	Landlord Incentives	FY2023	Ongoing	2 & 3

II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year 0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
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.	107	Complete	No	High rise apartments for 62 and over – voluntary conversion to PBV in FY2020
	313			

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 \$ \$475,665
KY004 PHA-Wide Management Improvements \$237,832
KY004 PHA-Wide Administration \$237,832
KY004 PHA-Wide Fees & Costs \$200,000
KY004000001 Back deck & stair replacement \$95,000
KY004000002 Bathroom Renovation \$398,028
KY004000003 Bathroom & Kitchen Renovation \$352,968
KY004000006 Roof Replacement \$84,000
KY004000007 Stairs Replacement \$50,000
KY004000010, 11,13, 15, 33 Bluegrass Developments Stair Tread Replacement \$45,000
Connie Griffith Energy Management System \$400,000

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	10356	863
MTW Housing Choice Vouchers (HCV) Utilized	31020	2585
Local, Non-Traditional: Tenant-Based^	5232	436
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	46608	3884

* “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	N/A
Local, Non-Traditional	N/A

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The

“Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Regional Waiting Lists	919	Partially Open	Yes
Housing Choice Voucher	Community Wide	265	Closed	Yes
PBV	Centre Meadows	777	Partially Open	Yes
PBV	Connie Griffith	89	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 #33: LHA Increasing Affordable Housing Opportunities Initiative (Local Non-Traditional)

A. Activity Description

i. Proposed Activity

The Lexington Housing Authority (LHA) proposes to implement a new MTW activity that will promote and increase affordable housing opportunities through rental assistance and homeownership. The proposed activity would authorize LHA to use MTW funding to preserve and expand affordable housing units as determined to be beneficial in the local community. Alternatives include direct grants, hard or soft loans, loan guarantees, property purchases, gap funding, purchases of investor interests and others. The activity would provide LHA the authority to provide critical flexible assistance to affordable housing units serving households with varying income levels. These efforts may be funded by varying funding sources, i.e., local, state and federal opportunities as well as HUD-held reserves. The activity also would strengthen the Section 8 homeownership assistance program.

With LHA's proven experience as the developer, it is our intent to serve as the developer, giving us the ability to direct more dollars into our affordable housing efforts. The uncertain economy and pleas from affordable housing advocates influence our response to seek development opportunities when and where it is possible, but paying close attention to infill development. LHA will seek collaborative partners to accomplish development goals.

LHA plans to begin implementation of this activity in FY2024 to support the planned development of nine (9) homeownership units at Shropshire Avenue on a parcel of land owned by the LHA at an estimated cost of \$2.7 million. The property is located in Lexington's East End neighborhood, an area that is undergoing a resurgence. The site of the planned development has been vacant for several years following the demolition and subsequent HOPE VI redevelopment of the LHA's largest public housing site (Bluegrass-Aspendale) in 2005. This development is the final piece to a much larger development initiative. The homeownership development is in close proximity to the LHA's planned \$1.5 million, 5-unit townhome rental development, a planned \$3 million child care development center as well as a \$750,000 new street (currently under construction) for rear-entry access to the proposed homeownership houses and child care center. LHA has received the support and most importantly financial backing of LFUCG to complete the aforementioned projects currently underway.

To make these homes affordable, LHA may build, market and sell these houses and enlist the support of community stakeholders who can offer financial counseling, down payment assistance and secure financing. LHA will work with lenders with whom it has partnerships to facilitate the goals of the program. LHA will offer flexibility on income restrictions based on requirements of the funding source but the maximum income will not exceed 120% of Area Median Income (AMI).

Some of the homebuyers may use the Section 8 homeownership assistance program. The HUD regulations require that, with the exception of a family that qualifies as an elderly or disabled family, family members may not receive homeownership assistance for more than fifteen (15) years if the initial mortgage incurred to finance purchase of the home has a term of twenty years or longer; or ten years, in all other cases. In

PROPOSED MTW ACTIVITIES: HUD Approval Requested

appropriate circumstances, LHA will offer homeowners a 20-year term of HCV assistance to make the house more affordable. LHA also may offer other terms, such as down payment assistance or a mortgage buy down, that differ from those required by the regulation to assist the homebuyers further and improve the workability of the program in Lexington.

ii. Statutory Objectives the Proposed Activity will Achieve

This activity will achieve the statutory objective of increasing housing choice, by producing and preserving housing reserved for and affordable to low-income households.

iii. Schedule for Implementing the Proposed Activity

Once MTW approval is received, LHA staff promptly will begin the construction bid process. Staff promptly will begin seeking partners to facilitate the homeownership process. LHA anticipates that construction will begin in early fall 2023, with a 18-month construction schedule.

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.

C. Cost Implications

Up to nine homebuyers who participate in the Section 8 homeownership assistance program would receive an additional five years of HCV subsidy—eventually up to \$450,000 if the HCVs were to cost \$10,000 annually. The costs of additional housing development or preservation activities would be determined when specific investments of MTW funds are identified.

D. Need/Justification for MTW Flexibility

This proposed activity is authorized by MTW flexibility, specifically:

- MTW Agreement Attachment D, Second Amendment to the MTW Agreement, Use of MTW Funds (authorizes Local, Non-Traditional Activities)
- Attachment C – Section D. Authorizations Related to Section 8 Housing Choice Vouchers Only, 8. Homeownership Program, a. – The Agency is authorized to establish reasonable Section 8 homeownership programs that are not limited by the existing Section 8 homeownership requirements. *This authorization waives certain provisions of Section 8(o)(15) and 8(y) of the 1937 Act and 24 C.F.R. 982.625 through 982.643 inclusive as necessary to implement the Agency’s Annual MTW Plan.*
- PIH Notice 2011-45, Notice PIH 2011-45, Parameters for LNT Activities under the MTW Demonstration Program
- Attachment C – Section B. Authorizations related to Both Public Housing and Section 8 Housing Choice Vouchers, 1. Single Fund Budget with Full Flexibility. *This authorization waives certain provisions of Sections 8 and 9 of the 1937 Act and 24 C.F.R. 982, and 990 as necessary to implement the Agency’s Annual MTW Plan.*

LHA needs the local non-traditional activities authorization to support use of MTW funds for development or preservation investments with respect to low-income housing that is not subsidized under the Section 8

PROPOSED MTW ACTIVITIES: HUD Approval Requested

project-based voucher, Section 8 homeownership assistance or public housing programs. LHA needs authorization to extend the Section 8 homeownership assistance past the time period authorized by applicable regulations.

- E. Rent Reform/Term Limit Information (if applicable)
Not Applicable

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

Activity Metrics

Metric	Baseline	Benchmark	Final Projected Outcome
Additional Units of Housing Made Available (Standard Metric: HC#1)			
Number of new housing units made available for households at or below 80% AMI	Before implementation, 0 units made available	FY2024: 9 units	To be determined
Units of Housing Preserved (Standard Metric: HC#2)			
Number of housing units preserved for households at or below 80% AMI	Before implementation, 0 units preserved	0 units	To be determined

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

IV

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 39 participants for: New Vista, Community Action Council, Arbor Youth Services and Natalie's Sister. LHA also provides an additional 24 to Fayette County Public Schools and Greenhouse17. 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.

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 2022, 695 families were served and monthly \$16,247 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.
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.

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	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: <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.

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.
	<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 #18: Streamline HQS Inspection of LHA-Owned/Controlled Property	
Plan Year Approved, Implemented, Amended	Proposed /approved/ Implemented - FY2017
Description/Update	<p>The LHA's Housing Choice Voucher (HCV) inspectors perform HQS inspections of LHA-owned property or affiliates that receive HCV assistance rather than a third-party inspector. Prior to proposal of this activity, HCV inspectors from other jurisdictions perform HQS inspections on LHA-owned properties or affiliates, which slows the leasing process. In cases where the property is a tax credit entity, the property is being inspected by LHA public housing management staff, in addition to an HQS inspection. This activity is ongoing and HCV staff believe this authority allows for more efficient use of staff time and unit turn around has been expedited.</p> <p>COVID restrictions have been lifted, however personal protective</p>

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

	equipment (PPE) is made available to inspectors, and they may utilize it at their discretion. Inspection notification letters ask that household members respect the inspector’s personal space.
	HQS inspections continued during FY2021 during the COVID-19 crisis with added precaution and all inspectors were required to use personal protective equipment (PPE) that included face masks, gloves, and shoe covers. Participants were sent notification that social distancing would be necessary to conduct inspections and advised to contact the HCV office if someone in the household was experiencing COVID-19 symptoms or so that the inspection could be rescheduled.
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 #19: Tenant-Based Rental Assistance for Youth Aging Out of Foster Care	
Plan Year Approved, Implemented, Amended	Proposed /Approved and Implemented - FY2017
Description/Update	The LHA received approval offer tenant-based vouchers to Foster Care youth (ages 18- 24) aging out Kentucky’s foster care program. The LHA provides a maximum ten (10) tenant-based vouchers annually for youth aging out of foster care. LHA staff has established a partnership with the local Community Action Council (CAC), who receives referrals from the state Cabinet for Health and Family Services, to implement this initiative. The LHA has entered into a Memorandum of Understanding with CAC to supply vouchers to the Cabinet referrals and CAC provides the mandatory case management to the participant. The CAC staff interview, screen and enroll families for the program. To date, 16 participants are housed through this 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 MTW activity through an annual MTW Plan amendment in the Plan year.

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

	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 #20: Assign Project-Based Vouchers to LHA Owned/Controlled Units Without Bid Process	
Plan Year Approved, Implemented, Amended	Proposed /Approved and Implemented - FY2017
Description/Update	The LHA received approval to select existing and new LHA owned/managed property for project-based voucher assistance without a competitive bid process. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project. The LHA LHA-owned Connie Griffith Apartments was converted to PBV following voluntary conversion from public housing in FY2020. LHA may utilize the authorizations of this activity in developments planned for FY2022.
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	The LHA plans no changes 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.

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 FY2022, 25 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.

Activity #22: HCV Time Limit Pilot Program (Rent Reform)	
Plan Year Approved, Implemented, Amended	Proposed / Implemented - FY2018
Description/Update	<p>The LHA's Time Limit Pilot program for HCV new admissions entered its fifth year of implementation in 2023 with 12 participants. LHA wishes to close out this activity due to lack of participant interest. LHA plans to absorb current participants into the regular MTW vouchers. The Pilot Program aimed 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.</p> <p>Many participants lost their employment during the COVID pandemic and still have not been able to find suitable employment, making it difficult for them to meet their goal of self-sufficiency after five (5) years.</p> <p>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.</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.

APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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.

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.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 #28: HCV Alternate Certification Schedule	
Plan Year Approved, Implemented, Amended	Proposed/Implemented – FY2021
Description/Update	<p>This activity was approved in the FY2021 MTW Annual Plan and is ongoing. HCV participants are allowed an alternative recertification schedule of every three years rather than annual certification of income. Program participants are not required to report increases in income during the three years. The approved FY2022 MTW Annual Plan contained the following modifications:</p> <ul style="list-style-type: none"> • To establish annual gross income for the three-year certification period LHA will review the total household income without deductions for the twelve-month period prior to recertification. • If at any time between recertifications a family has a change in composition, the family needs to report the change and an interim will be processed for the household composition change and the voucher size adjusted with the corresponding payment standard. LHA will give the household a minimum 60-day notice of rent increase, if applicable. <p>All original components of this activity remain in place with the original approval of the FY2021 MTW Plan.</p>

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

Planned Non-Significant Changes	LHA has not planned any non-significant changes or modifications to this activity during the Plan year.
A 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.

Activity #30: Exclude Student Financial Aid from Income Calculation (HCV Participants)	
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.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 31 – HCV - Rent Reform for Elderly and Disabled Households	
Plan Year Approved, Implemented, Amended	Proposed/Implemented - FY2023
Description/Update	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 offers 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 eliminates deductions from subsidy calculation and the total tenant payment is determined by using 28% of gross income.
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 32 – HCV Landlord Incentives	
Plan Year Approved, Implemented, Amended	Proposed/Implemented - FY2023
Description/Update	LHA offers landlord incentives for the Housing Choice Voucher Program. In recent months staff has seen a decrease in participating landlords. LHA will: <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.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 the Plan year where it was necessary to implement this activity.
Timeline for Implementation	The LHA will develop a timeline for this activity during the Plan year 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 the Plan year.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 the Plan year 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 the Plan year.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 the 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 Ballard, LLC, an LHA controlled entity. The LHA successfully completed renovation of 134 apartments in FY2020.

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

<p>Timeline for Implementation</p>	<p>The LHA will develop a timeline for this activity during the Plan year should the Authority encounter an emergency that would result in a financial hardship for the property which would necessitate the used of the MTW emergency reserves.</p>
<p>Explanation of any non-significant changes to the activity since it was approved.</p>	<p>The LHA does not anticipate any non-significant changes or modifications to this activity during the Plan year.</p>

C. Activities on Hold

N/A

D. Closed Out Activities

<p>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)</p>
<p>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.</p>
<p>Activity #3 - Triennial Recertification of Connie Griffith Towers and HCV Elderly/Disabled Households Approved Implemented FY2012-2013 Plan, Modified FY2014 (Closed out FY2018)</p>
<p>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.</p>
<p>Activity #4 - HCV Rent Reform Controlled Study: No Rent Reduction Requests for 6 Months After Initial Occupancy (Closed out FY2015)</p>
<p>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.</p>

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

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 closeout 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	1,919,571
97500+97600+97700+97800	All Other Expense	\$13,256
90000	Total Expenses	43,026,103

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 FY2024 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*	\$21,903,908	\$620,000
HCV Admin Fee	\$24,441	\$24,441
PH Operating Subsidy	\$2,507,682	\$540,000
TOTAL:	\$24,436,031	\$1,184,441

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.

Funding of continuation of HCV landlord incentive program because current grant is expiring; Funding administrative/operational needs because of growth in development activities; Strip and seal all parking lots;

* 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 2024 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 FY2023 MTW Annual Plan was approved by HUD on February 24, 2023, as submitted on August 18, 2022, effective through June 30, 2023; and

WHEREAS, LHA has proposed one new activity in the 2024 MTW Annual Plan that will serve to increase affordable housing opportunities, and the elimination of a previously approved activity in the FY 2018 MTW Annual Plan and

WHEREAS, a Board Resolution approving the proposed FY 2024 MTW Annual Plan and required Certifications of Compliance that must be included in the submission provided to HUD; and

WHEREAS, LHA staff has distributed the Annual Plan to the Board of Commissioners, has allowed thirty days from March 20, 2023, through April 19, 2023, for the public to comment on the Plan, and has conducted a Public Hearing on April 4, 2023, 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 2024 MTW Annual Plan, effective July 1, 2023, through June 30, 2024, 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.

Jean Whitman
Jean Whitman
Chairperson, Board of Commissioners

April 25, 2023
Date

Recommendation: It is the recommendation of the Lexington Housing Authority staff that the Board of Commissioners approve the resolution to submit the approved FY 2024 Moving to Work Annual Plan to HUD. Furthermore, Austin J. Simms shall be authorized to execute all documents related to submission of the revised Moving To Work Plan.

Certifications of Compliance


OMB Approval No. 2577-0216 (exp. 3/31/2024)

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 27/01/2023, 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, 5904(b)(2), 5906(d)(7)(B), 12/05(b)(15), and 1437C-1(f)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(a) 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(a), 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.

form HUD 50900: Certifications of Compliance (3/2021)

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- (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 Hyde 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 90 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.

<u>Lexington-Fayette Urban County Housing Authority</u>	<u>KY006</u>
MTW PHA NAME	MTW PHA NUMBER/HA CODE
<p><i>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).</i></p>	
<u>Austin J. Simms</u>	<u>Secretary, LHA Board of Commissioners</u>
NAME OF AUTHORIZED OFFICIAL	TITLE
	<u>04/20/2023</u>
SIGNATURE	DATE
<p><small>* 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.</small></p>	

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).

The public comment period was March 20 – April 19, 2023.



**LHA Public Hearing
Tuesday, April 4, 2023
5:30 p.m.**

Screenshot of zoom attendees.



LHA Staff in attendance:

- Sean Cooper, Chief Financial Officer
- Andrea Wilson, Chief Operating Officer
- Tonya Christopher, HCV Assistant Manager
- Cathy Hall, Housing Manager
- Aldean Pleasant, HCV Manager
- Michele Lee, Contracts, Grants and MTW Manager
- Tom Smith, Facilities/Development Manager
- Dana Mason, Housing Manager
- Austin Simms, Executive Director
- Renee Christian, Housing Manager
- Andrew Merrill, Housing Manager

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: a. contract ___ b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance</p>	<p>2. Status of Federal Action: a. bid/offer/application ___ b. initial award c. post-award</p>	<p>3. Report Type: a. initial filing ___ b. material change For material change only: Year ___ quarter ___ Date of last report _____</p>
<p>4. Name and Address of Reporting Entity: ___ Prime ___ Subawardee Tier ____, if known: Congressional District, if known:</p>	<p>5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime: Congressional District, if known:</p>	
<p>6. Federal Department/Agency:</p>	<p>7. Federal Program Name/Description: CMA Number, if applicable: _____</p>	
<p>8. Federal Action Number, if known.</p>	<p>9. Award Amount, if known. \$ _____</p>	
<p>10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI).</i></p>	<p>b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i></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: _____ Print Name: _____ Title: _____ Telephone No.: _____ Date: _____</p>	
<p>Federal Use Only</p>	<p>Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)</p>	

NOT APPLICABLE

Certifications of Payments to Influence Federal Transactions

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

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) 04/20/2023

Previous edition is obsolete

form HUD 50071 (01/14)