

**Lexington Housing Authority** 

# MOVING TO WORK ANNUAL PLAN FY2025



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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 FY2025 Annual MTW Plan marks LHA's fourteenth (14th) 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 FY2024, many LHA tenants continued to struggle to pay rent. In September of 2023 LHA partnered with Legal Aid of the Bluegrass to offer mediation and rental assistance funded by a grant from the Lexington-Fayette Urban Government (LFUCG). To date, 51 mediations for LHA tenants with delinquent rent were conducted and approximately \$90,000 was paid for delinquent rent. LFUCG announced in March of 2024 that the mediation program will be extended and funded for \$200,000 for this program.

#### **Pemberton Townhomes Development**

This new development of five rental townhome units (HOME Income Limits), on an additional vacant parcel of land, also located in downtown Lexington, has reached the final construction phase and is scheduled for May 2025 completion. LHA received a commitment through a HOME-ARP application with the city of Lexington of approximately \$1 million to fund this project.

#### **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 resurgance. 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. LHA continues to look for opportunities for affordable homeownership development for this parcel of land that is in close proximity to a planned \$3 million child care development center as well as a \$750,000 new street for rear-entry access to the proposed 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 two 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, four duplex units and two 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.

#### **Scattered House Disposition**

LHA has started the process of converting 34 single-family houses (public housing) during FY2025. The Housing Authority plans to submit an application through HUD's Demo Disposition Application (DDA) Program with conversion assistance from tenant protection vouchers (TPVs) awarded through a Section 18 disposition approval. The disposition will remove the houses from LHA's public housing stock. Preliminary plans will allow LHA to retain ownership of the houses and commit project-based vouchers to each house, allowing current tenants the opportunity to continue occupancy in the unit. LHA anticipates the conversion to be complete by the end of FY2025 (June 30, 2025).

#### **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:

- To reduce costs and achieve greater cost effectiveness in federal expenditures;
- 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 33 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 correspond with the numbered objectives.

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 FY2014and 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

		Plan Year	_	Statutory
Activity	Activity Description	Proposed/ Modified	Status	Objective
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

Activity	Activity Description	Plan Year Proposed/ Modified	Status	Statutory Objective
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
33	LHA Increasing Affordable Housing Opportunities Initiative (Local Non- Traditional)	FY2024	Ongoing	
34	Local Non-Traditional - Targeted Housing Initiative	FY2024	Proposed	
35	Rapid Housing Initiative to Reduce Vacancies of Hard-to-Lease Units	FY2025	Proposed	

#### 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)					TOTAL UNITS	POPULATION	Accessibilit	rm Federal ry Standards S) Units		
NAME AND NUMBER	0/1	2	3	4	5	6+	UNITS	TYPE*	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

#### 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
AMP 1	11	Conversion of 34 single family homes from Section 9 funding to Section 8 funding going thru the Demo Disposition Application (DDA) process.
AMP 2	9	Conversion of 34 single family homes from Section 9 funding to Section 8 funding going thru the Demo Disposition Application (DDA) process.
AMP 3	14	Conversion of 34 single family homes from Section 9 funding to Section 8 funding going thru the Demo Disposition Application (DDA) process.

34

Total Public Housing Units to be Removed in the Plan Year

<sup>\*</sup> Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

#### 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
Scattered-Site Houses	34	No	Conversion of 34 single family homes from Section 9 funding to Section 8 funding going thru the Demo Disposition Application (DDA) process.  N/A
N/A	0	N/A	N/A

Planned Total Vouchers to be Newly Project-Based

34

#### **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
	107	Complete		High rise apartments for 62 and over – voluntary conversion to
Connie Griffith Apts.	313		No	PBV in FY2020

#### **Planned Total Existing Project-Based Vouchers**

#### 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.

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

#### 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 \$477,163

KY004 PHA-Wide Management Improvements \$238,581

KY004 PHA-Wide Administration \$238,581

KY004 PHA-Wide Fees & Costs \$200,000

KY004000001 Back deck & stair replacement, Security

Access Controls \$95,000

KY004000007 Security Access Controls

KY004000009 Roof Replacement \$250,000

Centre Meadows Roof Replacement \$750,000

Connie Griffith Energy Management System \$300,000

#### 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	10248	854
MTW Housing Choice Vouchers (HCV) Utilized	31824	2652
Local, Non-Traditional: Tenant-Based^	5232	436
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	47304	3942

<sup>\* &</sup>quot;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.

<sup>\*\* &</sup>quot;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.

<sup>^</sup> In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the 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

<sup>\*</sup> 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	1432	Partially Open	Yes
<b>Housing Choice Voucher</b>	Community Wide	2964	Closed	Yes
PBV	Centre Meadows	661	Partially Open	Yes
PBV	Connie Griffith	237	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

# Activity #27: HCV Portability Restrictions Plan Year Approved, Implemented, Amended Proposed / Implemented - FY2021

#### A. Description/Update

i. Through approval of this activity, LHA limits portability for work- able 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. LHA only allow ports (in or out) for work-able households if the head/co-head of household is employed a minimum of 20 hours per week on average with at least a six (6) consecutive-month work history or gaining new employment in LHA's jurisdiction.

LHA staff proposes that workable households porting in with a job offer or currently employed, the job offer employment income or current income will not be reduced to less than \$7,540 for the first 12 months. The household may request a hardship should the reduction in income be outside of their control, otherwise the household's actual income will be used to calculate the rent. Increases in income will be processed the same as non-portability households.

#### ii. Statutory Objective(s) Achieved.

LHA staff believes implementation of this activity will reduce cost by encouraging employment that will subsequently reduce HAP paid by the LHA. This savings in HAP will allow LHA to assist more families locally offering them the choice to select housing in neighborhoods with lower poverty, better schools and better employment opportunities.

#### iii. Implementation Schedule

Upon Plan approval the new component to this activity will be implemented. Elderly and disabled households are exempt from this activity and will continue to be governed by traditional portability rules.

#### **B.** Activity Metrics Information

Unit of Measure: Housing Assis	tance Payment on behalf of affec	ted households (decrease).	
Baseline Cost of task prior to implementation of the activity (in dollars).	Benchmark Expected cost of task after implementation of the activity (in dollars).	2025 Actual cost of task after implementation of the activity (in dollars).	Benchmark Achieved?
\$193 Per Household Actual Average Monthly HAP Payment	\$180 Per Household Expected Average Monthly HAP Payment	TBD	TBD

SS#1: Increase in Household Income			
Unit of Measure: Averaged ea	rned income of households aff	ected by this policy in dollars (ir	ncrease).
Baseline	Benchmark	2025	Benchmark Achieved?
Average earned income of households affected by this policy in dollars(increase).  Average earned income of porting clients = \$7,000	Expected average earned income of households affected by this policy in dollars(increase).  Expected average earned income of porting clients =\$10,100	Actual average earned income of households affected by this policy in dollars(increase).	TBD

SS#3: Increase in Positive Outcomes in Employment Status			
Unit of Measure: Numb	er of Employed Work-Able	Portability Households	
Baseline	Benchmark	2025	Benchmark Achieved?
Heads of Household Employed prior to implementation of the activity (number).	Expected Heads of Household Employed prior to implementation of the activity (number).	Actual Heads of Household Employed prior to implementation of the activity (number).	TBD
Number of work-able employed heads of household. 39	Expected number of work-able employed heads of household.	TBD	

#### III. APPROVED MTW ACTIVITIES: HUD Approval Requested – Proposed Activities

#### C. Cost Implications

LHA believes cost implications would be positive allowing LHA to pay less HAP for employed households requesting to port in/out.

LHA does not believe the proposed activity will result in added cost. Any cost savings will allow LHA to serve more HCV households.

#### D. Need/Justification for MTW Flexibility

D. 1. g. The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. *This authorization waives certain provisions of Section* 8(r) of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the Agency's Annual MTW Plan.

#### **Activity #28: Alternate Certification Schedule**

Proposed/Implemented - FY2021

#### A. Description/Update

i. This activity was approved in the FY2021 MTW Annual Plan and is ongoing. At first annual recertification after New Admissions (12 months), 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 unless the income that is being used to calculate tenant rent portion is less than \$6500 annually or the additional of household member and the newly added member has income, LHA request this activity from the original submission as follows.

The approved FY2022 MTW Annual Plan contained the following modifications:

MTW HCV New Admissions will pay 28% of their gross monthly income with no deductions. When calculating a household's income including asset income at the time of admission to the program or during an interim reexamination, LHA will use anticipated income (current income) i.e., the family's estimated income for the upcoming 12 month period. At the first annual reexam after new admission, 12 months, or if household moves with continued assistance within the first 12 months, household's income will be calculated based on Activity 28 guidelines.

FSS participants will be excluded from triennial recertifications and Activity 28 rent reform requirements.

Changes from FY2021 proposed activity are in italics.

- Calculation of deductions and allowances are eliminated in the determination of annual income.
- The TTP rent calculation will be determined by establishing gross annual income and then determining the greater of 28% of the gross annual income or the minimum rent of \$150.
- LHA will eliminate verification and calculation of income earned from household assets with a total value of less than \$50,000(then continue with remaining for bullet)
   Households would not be required to document assets valued at less than \$50,000.
- At the certification, if a household's current/anticipated annual gross income is less than
  its retrospective income by more than 10%, a "temporary" TTP based on current income
  alone will be set for a three-month grace period. After that grace period, the TTP will
  automatically be switched to the TTP amount based on the previously determined

average retrospective gross income. No interim recertification interview would be required to reset this TTP. If the current income has not increased after the *three*-month grace period, the household may request a hardship for another 90 days, causing their retro income to decrease even more. The hardship would not reduce the TTP less than the LHA's minimum rent of \$150 for 90 days.

- HUD places a rent maximum for households moving into a new unit, there is a maximum initial rent burden cap of 40% of household's monthly adjusted income. LHA is proposing that this be changed to 40% of the household's gross monthly income due to participant's Total Tenant Payment (TTP) calculated at 28% of the household's gross monthly income. (This maximum rent burden requirement is not applicable at reexamination if the family stays in place.
- Triennial re-certification will review program eligibility, household composition, income and other household circumstances. Additional re-examinations ("interim certifications") may be required for changes in the household situation such as: composition, income, and change in unit. LHA will continue to use a local form in addition to HUD form 9886. LHA has implemented the new version of the HUD 9886 form.
- Gross income will exclude any prior income from sources that have expired for the household during that period, such as TANF/SS/SSI or Unemployment Insurance benefits, since the household can no longer count on them. It will include imputed welfare income i.e., any sanctioned portion of a household's TANF/SS/SSI grant). Income from household members removed from the voucher will also be excluded from the review of retrospective income.
- If the household has an increase in income between certifications, the household's TTP will not be re-determined and increased to reflect the higher income, except for households with annual income of less than \$6,500. However, if the household has a decrease in income, the household may request and LHA may provide an interim recertification. The interim re-certification will be conducted when a household has a reduction of income of more than 10% from the retrospective income.
- LHA interim certification will re-calculate the household Total Tenant Payment (TTP) based on a new retrospective income review to determine the greater of 28% retrospective gross income or the minimum rent of \$150. This new TTP will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. Changes to household composition will not be counted towards the limit of one requested interim certification per year.

- At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective income by more than 10%, the current income alone will be used to create a "temporary" TTP for a three-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP. If the loss of a household member results in a reduction of more than 10% of the most recent retrospective income, the household will be allowed to reset their TTP.
- In the event that the new or removed member requires a change to the voucher bedroom size, LHA will review the retrospective income of the newly added or removed household members, apply a new utility allowance, and will reset the household TTP. A reduction in subsidy for new voucher bedroom size will be upon the sooner of either the next triennial recertification or move to a new unit A reduction in subsidy for the new voucher size will be effective the sooner of 60 days-notice of the increase; next triennial recertification; or, move to a new unit.
- Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, LHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. If a family has a change in composition, the household composition change and the voucher size will be adjusted with the corresponding payment standard.
- Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:
  - at certification and the TTP is recalculated during interim or triennial,
  - Move to new units, or
  - change their household composition requiring a change in voucher size.
- simplified utility allowance chart will no longer be used. LHA will use the utility allowance schedule used for other HCV vouchers.
- 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.

#### III. APPROVED MTW ACTIVITIES: HUD Approval Requested – Proposed Activities

 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.

#### i. Statutory Objectives Achieved

By allowing families to keep income increases during the three-year period families receive an opportunity to achieve greater self-sufficiency as well as greater housing choice opportunities

#### ii. Implementation Schedule

This activity ongoing and the proposed changes will be implemented July 1, 2024 for all MTW-eligible HCV households (excluding elderly and disabled households).

#### **ACTIVITY 28 - HUD METRICS**

CE #1: Agency Cost Savings			
Unit of Measurement: Total cost of task in dollars (decrease).			
Baseline	Benchmark	FY2025	Benchmark Achieved?
Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$563 Monthly HAP Payment	\$450 Expected  Monthly HAP Payment	\$541 Monthly HAP Payment	TBD

CE #2: Staff Time Savings			
Unit of Measurement: Total tin	ne to complete the task in staf	f hours (decrease).	
Baseline	Benchmark	FY2025	Benchmark Achieved?
Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
.66 (40 minutes)	1 Hour	TBD	TBD

CE #5 Increase in Agency Rental Revenue Unit of Measure: Total Household contributions towards housing assistance (increase).			
Baseline	Benchmark	FY2025	Benchmark Achieved?
Household contributions prior to implementation of the activity (in dollars).	Expected household contributions after implementation of the activity (in dollars).	Actual household contributions after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average Tenant Rent Contribution \$308	Average Tenant Rent Contribution \$251	TBD	NO

# III. APPROVED MTW ACTIVITIES: HUD Approval Requested – Proposed Activities

SS #1: Increase in Household Income			
Unit of Measurement: Avera	age earned income of house	holds affected by this policy in dollars (inc	rease).
Baseline	Benchmark	FY2025	Benchmark Achieved?
Average earned income of work-able households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of workable households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
\$15,512	\$19,380	TBD	TBD

SS #3: Increase in Positive Outcomes in Employment Status Unit of Measurement: Employment Status – Households Reporting Earned Income			
Baseline	Benchmark	FY2025	Benchmark Achieved?
Actual head(s) of work-able households employed - reporting earned income.	Expected head(s) of households reporting earned income.	Actual head(s) of work-able households after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
821 of 1,046	900 of 1,046	TBD	TBD

#### C. Cost Implications

The cost benefit of this activity will be demonstrated if participants are able to achieve higher earnings, thereby reducing the amount of subsidy.

Administrative cost savings to LHA will be achieved by conducting certifications every three years as opposed to annually.

#### D. Need/Justification for MTW Flexibility

**Operational Policies and Procedures** 

Authorization: Attachment C, Section D. 1 (c) provides LHA flexibility to define Operational Policies and Procedures. LHA may define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act. This provision waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516.

This flexibility is necessary to establish a triennial certification and revised interim certification schedule as part of the rent reform activity. Local forms will be used to adapt the 9886 to reflect a 36-month term between certifications.

#### **Rent Policies**

Authorization: Attachment C, Section D. 2 (a) Rent Policies and Term limits. LHA is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program...waives Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H) - (I) of the 1937 Act and 24 C.F.R. 982.508; 982.503 and 982.518.

This authorization is necessary for the provision to set minimum rent, elimination of deductions and allowances, using a percent of gross income to calculate TTP, setting the maximum initial rent burden to 40% of gross income and a simplified utility schedule as components of the rent reform activity.

#### **Eligibility of Participants**

Authorization: Attachment C, Section D. 3 (b) Eligibility of Participants. LHA is authorized to adopt and implement any reasonable policy for verifying household income and composition and for determining resident eligibility that differ from the current mandated program requirements. This provision waives provisions 24 CFR 982.516 and 982 Subpart E.

This authorization is necessary for the provisions to simplify rent calculation by eliminating income from household assets valued less than \$25,000; eliminating deductions and allowances and to use household gross income to set the TTP. IV.

#### **Activity #34: Local Non-Traditional -Targeted Housing Initiative**

#### A. Activity Description

#### i. Proposed Activity

This local, non- traditional rent assistance program offers housing, rent assistance, paired with case management, to help families access and/or retain stable housing. While the Housing Choice Voucher and public housing programs provide permanent subsidies to ensure long-term affordability for low-income families, the focus of this initiative is helping families and households achieve stability.

The Lexington Housing Authority has partnered with the Lexington-Fayette Urban County Government (LFUCG) to secure \$1.4 million in HOME-ARP grant funding to construct and provide five (5) 2-bedroom townhouses for homeless and at risk of homeless families. These units are solely owned and managed by LHA. The new units feature, paid utilities, paid water/sewer, all electric, 2 and 1/2 baths, central air conditioning, stainless steel appliances, dish washers, vinyl plank flooring, etc. LHA anticipates construction to be complete and the units ready for lease in April 2024.

For families to qualify for these units, the family will be given a preference and must be referred by LFUCG's Coordinated Entry list to LHA for verification of eligibility. Applicants must meet the income requirements of HOME low- to very-low income; four households served cannot exceed 60% of area median income (AMI) and one household served cannot exceed 50% of the AMI. All eligible households rents will be based on HOME rent guidelines. To further assist this population, the minimum rent will be set at \$0.

LHA is requesting approval to provide the monthly rental subsidy with a tenant-based voucher to all eligible households for these five units. Participants will be offered housing counseling case management through LHA's HCV program to receive rental subsidy. LHA will limit program participation to five years with consideration for two additional years on a case-by-case basis. Participants who successfully complete the program after five years will be eligible for a tenant-based voucher to move. LHA will provide assisted households with housing counseling to secure supportive services that may include financial literacy, job training and career counseling, mental health counseling, etc.

#### 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

LHA anticipates construction to be complete and the units ready for lease in April 2024.

#### **B.** Activity Metrics Information

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Five new housing units made available for households at or below 80% AMI as a result of the activity (increase). This activity targets homeless and at-risk homeless households.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Data Source for Metric Data - LHA will collect data through staff interviews, LFUCG reports and internal reports from Emphasys computer software.

#### C. Cost Implications

Five units receiving high-Home rent of \$1,025 monthly  $$($5,125 \times 12 = $61,500)$  for a maximum cost if all households had no income.

Five units receiving low-Home rent of \$1,005 monthly ( $$5,025 \times 12 = $60,300$  for a maximum cost if all households had no income

#### D. Need/Justification for MTW Flexibility

- i. HUD Notice PIH 2011-45, Parameters for LNT Activities under the MTW Demonstration Program
- ii. MTW Standard Agreement, Attachment C., B.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.
- **iii.** 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 for homeless populations. LHA needs authorization to extend the Section 8 rental tenant-based rental assistance in the manner described that are outside of applicable regulations.

#### Activity #35: Rapid Housing Initiative to Reduce Vacancies of Hard-to-Lease Units

#### A. Activity Description

i. Eliminating vacancies at LHA properties with hard-to -lease units is a priority for LHA staff. LHA proposes to remove the waiting list requirement for public housing units that have 90 or more vacant days. LHA will advertise and lease these units with a separate waiting list. Referrals for these units will be taken through local social service agencies (Community Action Council, LFUCG Resident and Community Services, Salvation Army, etc.), LHA's service coordinator and self-certification from the applicant if they can demonstrate that they are paying more than 30% of their adjusted income toward rent and utilities, are homeless or at risk of homelessness. All candidates will be required to meet the program qualifications for the property.

To fill hard-to-lease units, LHA will continue to be responsible for advertisement, applicant screening, and eligibility verification. Applicants will be required to meet the eligibility requirements for the site but there will be no waiting list for the hard-to-lease units.

Currently, LHA has 16 (2% of 914 units) vacant units with 90 or more vacant days. Staff reports that the lease-up process would be quicker and we would still be serving our target population of households earning less than 80% of AMI.

- ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s). This activity will reduce costs and achieve greater cost effectiveness in federal expenditures by improving vacancy rates and increasing rental revenue.
- iii. Provide the anticipated schedule for implementing the proposed activity.
  Once approved this activity will be implemented upon approval of the FY2025 Plan.
  LHA will place 'For Rent' signage in the yards of properties, notify local social service agencies for referrals, as well as online and social media advertising.

#### **B. ACTIVITY METRICS**

**CE #5: Increase in Agency Rental Revenue** 

CE #5: Increase in Agency	CE #5: Increase in Agency Rental Revenue			
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue for hard- to-rent units (increase).	Number of vacant hard-to-lease units (90 or more days vacant) prior to implementation of the activity . This number may be zero.	Number of vacant hard-to- lease units (90 or more days vacant) after implementation of the activity .	Actual number of hard-to-lease units (90 or more days vacant) after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
	18	0	TBD	

#### C. COST IMPLICATIONS

The approval of this activity will reduce vacancies of hard-to-leas units, thereby increasing rental revenue. LHA anticipates no negative implications to this activity. Currently, LHA is losing rental revenue on

#### D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

Attachment C., Section C. 1. Authorizations Related to Public Housing Only - The agency is authorized to implement a locally designed waiting list system in lieu of the specific procedural requirements of 24 C.F.R. Part 903 provided it provides applicants with reasonable choice of location in accordance with title VI of the Civil Rights Act, the Fair Housing Act and other applicable civil rights requirements.

Activity #1: Increase Minimum Ren	t 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.
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.
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.

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	<ul> <li>Interim reductions in the rent portion are limited to one per household between regularly scheduled re-examination periods.</li> <li>For households who are not elderly or disabled, interim adjustments are limited as follows: <ul> <li>Households may only request an interim reduction once between regularly scheduled re-examination periods.</li> <li>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.</li> <li>In calculating the reduction, all household income, including previously unreported income, is counted.</li> <li>The household's loss of income must be expected to last longer than four (4) months.</li> <li>All interim rent reductions are temporary.</li> </ul> </li> </ul>

	<ul> <li>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.</li> </ul>
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> <li>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.</li> </ul>
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	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.

	COVID restrictions have been lifted, however personal protective 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/	No changes are planned to the metrics/data collection during
Data Collection	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 plans to close this activity out in FY2025 because we no longer receive referrals from the local Community Action Council (CAC) to implement this initiative. One (1) participant remains and their 5 year time limit expires July 2024.
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.

	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.

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	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 timelimited housing assistance for work-able new admissions to the HCV Program for five (5) years with a potential two (2) year extension.
	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.
	Participants affected by this policy must work a minimum of 20 hours per week; TTP is calculated based on 28% of adjusted income; triennial recertification, with increases in income excluded until the next certification and mandatory participation in LHA-provided case management. Elderly households are exempt from this activity.
Planned Non-Significant Changes	LHA has not planned any non-significant changes or modifications to this activity during the Plan year.
Planned Changes to Metrics/ Data Collection	No changes are planned to the metrics/data collection during the Plan year.
Planned Significant Changes	There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year.

Activity #23: Rent Reasonableness Determinations To Be Made By LHA Staff on LHA-Owned/Controlled Properties	
Plan Year Approved, Implemented, Amended	Proposed / Implemented - FY2018 / Amended January 2018 / Implemented March 2018
Description/Update	The LHA performs rent reasonableness determinations on all property owned or managed by the LHA. This initiative aims to eliminate the administrative work and cost of acquiring an independent entity to perform rent reasonableness determinations on LHA owned-controlled units. Eliminating the independent entity improves administrative efficiencies, eliminates confusion for the voucher participant, and improves the response time for performing inspections. The LHA has experienced no issues with this activity since implementation. This activity is ongoing.
Planned Non-Significant Changes	LHA has not planned any non-significant changes or modifications to this activity during the Plan year.
Planned Changes to Metrics/ Data Collection	No changes are planned to the metrics/data collection during the Plan year.
Planned Significant Changes	There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year.

Activity 24: Elimination of Project-Based Voucher Choice Mobility at LHA- Owned/Controlled Units	
Plan Year Approved, Implemented, Amended	Proposed / Implemented - FY2019
Description/Update	The Lexington Housing Authority eliminated the project-based voucher Choice Mobility option to offer assistance for families who elect to move after one year of occupancy in LHA-owned/controlled project- based voucher units (24 CFR 983.261). The LHA is mindful of the overwhelming need for affordable housing and sees the benefit of offering tenant-based rental assistance to families on the waiting list while continuing to assist families who are currently housed and receiving rental assistance in PBV units. Currently the 100 PBV leased units at Connie Griffith Apartments are affected by this activity. This activity does not apply to RAD units, reasonable accommodation instances or Violence Against Women (VAWA) cases.
Planned Non-Significant Changes	LHA has not planned any non-significant changes or modifications to this activity during the Plan year.
Planned Changes to Metrics/ Data Collection	No changes are planned to the metrics/data collection during the Plan year.
Planned Significant Changes	There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year.

Activity #25: HCV – Allow Excluded Income to Make Units Affordable		
Plan Year Approved,	Proposed / Implemented - FY2018 / Amended January 2018 /	
Implemented, Amended	Implemented March 2018	
Description/Update		

At the time of 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 gross monthly income. 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.

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.

Planned Non-Significant Changes	LHA has revised this activity to require the family's monthly share not to exceed 40% of the family's gross income instead of adjusted income.
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 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 public housing to Section 8 vouchers. HUD provided tenant protection vouchers to all CGA resident households at the time of conversion and to replace vacant units and one unit containing a household that was over-income for HCV. The CGA households may use their HCV at CGA or to move elsewhere. CGA tenants were concerned that they were being forced to move or that their rent was going to increase. This activity provides residents of the CGA rent and eligibility protections post- conversion that they would not have under the HVC program.
Planned Non-Significant Changes	LHA has not planned any non-significant changes or modifications to this activity during the Plan year.
Planned Changes to Metrics/ Data Collection	No changes are planned to the metrics/data collection during the Plan year.
Planned Significant Changes	There are no plans to pursue a significant change to this activity through an annual MTW Plan amendment in the Plan year.

Activity #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 activit 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.

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 will pay the security deposit on behalf of the participant not to exceed \$1500. This is for New Admissions and participants in an abated unit only. LHA will pay an incentive to landlords of \$1000 to incentivize landlords to join the HCV program (sign on bonus). This is for landlords who do not already have any HCV tenants. This will exclude tax credit units.

Incentive to active current landlords of \$500 for the addition of a new unit leased to a participant. This excludes tax credit units. Damage Claims – LHA will pay a landlord reimbursement for excessive tenant caused damages after accounting for any security deposit. The amount of compensation may not exceed the lesser of the cost of damages or two months contract rent. Tenant damages must be documented and accepted by LHA. It will be up to LHA's discretion as to determining claims regarding tenant fault. This will be reviewed on a case by case basis and if at a later date LHA determines this to be too costly will elect to discontinue. Tax credit units will be excluded.

The participant will be responsible for reimbursing LHA for the payment of damage claims to landlords.

#### **Planned Non-Significant Changes**

LHA has made non-significant changes or modifications to this activity to clarify how damage claims will be handled, who is eligible for security deposit assistance and conditions for eligibility.

#### 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 33 - LHA Increasing Affordable Housing Opportunities Initiative (Local Non-Traditional)

Plan Year Approved, Implemented, Amended

Proposed/Implemented - FY2024

#### **Description/Update**

The Lexington Housing Authority (LHA) proposed to implement this activity that to promote and increase affordable housing opportunities through rental assistance and homeownership. LHA will 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.

#### **Update**

LHA began implementation of this activity in FY2024 to support multiple uses for the vacant parcel of land at Shropshire Avenue owned by the LHA at an estimated cost of \$2.7 million. Currently, LHA's plans to develop this parcel have been delayed. A planned \$3 million child care development center developed by Community Action Council is proceeding as planned. A new street funded by the Lexington-Fayette Urban County Government is now complete that will allow rear entry access to the proposed child care center.

#### **Planned Non-Significant Changes**

LHA has made non-significant changes or modifications to this activity.

#### 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.

### A. Not Yet Implemented Activities

Activity #8: Conversion of Appian Hills Public Housing to Project-Based Vouchers		
Approval Dates: FY2012-2013 Plan, FY2014 (modified)		
Description	Appian Hills needs extensive capital improvements – including façade improvements, new windows, insulation in the exterior walls, and soundproofing between units. As part of this renovation, LHA will explore various ways to reconfigure the site's 27 four-bedroom homes.	
	LHA continues to work diligently to secure adequate funding to revitalize the Appian Hills public housing development. This site may be rehabilitated in its entirety or in phases, as determined by the Authority.	
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.	

Activity #9: Development of Project-Based Voucher Units at 800 Edmond St.		
Approval Dates: FY2012-2013 Plan		
The flexibilities provided through this MTW active 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	The LHA does not anticipate any non-significant	
changes to the activity since it was	changes or modifications to this activity during the	
approved.	Plan year.	

Approval Dates: FY2012-2013 Plan, FY2014 (modified)			
Description	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.  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.		
Update	Ballard Towers falls outside Section 8 and 9 programs as it is a Multi-Family site that was a taxcredit 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 inFY2020.		

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

#### C. Activities on Hold

N/A

#### D. Closed Out Activities

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

(Closed out FY2014)

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

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

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

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

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

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

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

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

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

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

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

#### **Activity 16: HCV Rent Reform Study**

Approved, Implemented, Amended – FY2015

The LHA is one of four MTW agencies participating in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit research organization, is conducting the Study on behalf of HUD. The Study concluded June 30, 2021 (FY2021). Researchers conducted a final 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.

<u>Note:</u> 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	\$8,050,506
70600	HUD PHA Operating Grants	\$34,055,607
70610	Capital Grants	\$300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$2,448,510
71100+72000	Interest Income	\$128,046
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	\$100,867
70000	Total Revenue	\$45,083,536

#### 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.

<u>Note:</u> 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	\$6,157,091
91300+91310+92000	Management Fee Expense	\$2,186,384
91810	Allocated Overhead	
92500 (92100+92200+92300+92400)	Total Tenant Services	
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$2,235,272
93500+93700	Labor	
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$5,589,654
95000 (95100+95200+95300+95500)	Total Protective Services	\$217,358
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$623,814
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses \$408,65	
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	
97100+97200	Total Extraordinary Maintenance	
97300+97350	HAP + HAP Portability-In	
97400	Depreciation Expense	\$2,095,729
97500+97600+97700+97800	All Other Expense	\$314,950
90000	Total Expenses	47,091,077

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

Variance is depreciation expense.

#### 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 FY2025 LHA will use MTW single fund fungibility by transferring excess cash reserves between Low Rent Public Housing (LRPH) and Section 8 funds as of 7/1/23 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
- 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

Conversion of 34 single family homes from Section 9 funding to Section 8 funding going thru the Demo Disposition Application (DDA) process.

Complete the development of the final parcel from our former Bluegrass Aspendale site to our new site known as Shropshire Avenue Development thru the DDA process to sell the acres for single home purchases which may include nine single family homes up to 19 townhouses. Including the lots for the early childhood prep academy.

#### (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	\$3,470,000
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$2,835,104	\$1,500,000
TOTAL:	\$24,739,012	\$4,970,000

#### 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 30<sup>th</sup> and end-of-year at December 31<sup>st</sup>. 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/FDSLineDefinitionGuide 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;

<sup>\*</sup> Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

<sup>\*\*</sup> 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.
The LHA is not implementing a LAMP
<ul> <li>(VI). RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION</li> <li>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.     </li> </ul>
RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
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.
<ul> <li>RAD Conversion Commitment 2<sup>nd</sup> Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</li> <li>RAD Conversion Commitment Final Amendment submitted February 14, 2014. Approved by HUD on February 28, 2014</li> <li>RAD Post-Closing Corrective Amendment issued by HUD on April 5, 2018</li> </ul>
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.

N/A

#### (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.

## REQUEST APPROVAL OF THE AMENDED FY2024 MOVING TO WORK ANNUAL PLAN FOR SUBMISSION TO HUD

LHA staff is seeking approval of the amended FY2024 MTW Annual Plan for submission to HUD. The LHA Plan was made available for public comment March 18 – April 17, 2024. A public hearing to review the Plan was held on Thursday, March 28, 2024 via Zoom video conference call.

LHA is proposing the following new activity:

#### Activity 34 - Local Non-Traditional - Targeted Housing Initiative

The Lexington Housing Authority has partnered with the Lexington-Fayette Urban County Government (LFUCG) to secure \$1.4 million in HOME-ARP grant funding to construct and provide five (5) 2-bedroom townhouses for homeless and at risk of homeless families. LHA anticipates construction to be complete and the units ready for lease in May 2024.

For families to qualify for these units, the family will be given a preference and must be referred by LFUCG's Coordinated Entry list to LHA for verification of eligibility. Applicants must meet the income requirements of HOME low- to very-low income; four households served cannot exceed 60% of area median income (AMI) and one household served cannot exceed 50% of the AMI. All eligible households rents will be based on HOME rent guidelines.

LHA is requesting approval to provide the monthly rental subsidy with a tenant-based voucher to all eligible households for these five units. Participants will be offered housing counseling case management through LHA's HCV program to receive rental subsidy. LHA will limit program participation to five years with consideration for two additional years on a case-by-case basis. Participants who successfully complete the program after five years will be eligible for a tenant-based voucher to move. LHA will provide assisted households with housing counseling to secure supportive services that may include financial literacy, job training and career counseling, mental health counseling, etc.

## RESOLUTION TO APPROVE AND SUBMIT THE AMENDED FY2024 MTW ANNUAL PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR APPROVAL

WHEREAS, the Lexington Housing Authority, a public housing agency, is a Moving To Work (MTW) Agency under the November 10, 2011, MTW Agreement was executed by the U.S. Department of Housing and Urban Development (HUD) and LHA; and

WHEREAS, in compliance with the MTW Agreement, the fiscal year 2024 MTW Annual Plan was approved by the U.S. Department of Housing and Urban Development on August 9, 2023; and

WHEREAS, a new activity, Activity 34: Targeted Housing Initiative (Local Non-Traditional) Activity, has been added to the FY2024 MTW Annual Plan that will provide non-traditional rent assistance program targeting homeless and at risk of homeless populations; and

WHEREAS, the amended Plan states the LHA's intention to provide the monthly rental subsidy with a tenant-based voucher to all eligible households for specific housing units owned and managed by the LHA; and

WHEREAS, the amended Plan requires that all applicants are referred from LFUCG's Coordinated Entry list to LHA for verification of eligibility and further allows qualified families a waiting list preference; and

WHEREAS, LHA invited comments on the amended Plan through notices posted on its website and advertised in the local newspaper and social media allowing for a 30-day comment period (March 18 through April 17, 2024) with a public hearing held on March 28, 2024; and

WHEREAS, this amended Plan will be submitted to HUD for review upon approval by the LHA Board of Commissioners;

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the amended FY2024 MTW Annual Plan is approved and that the Executive Director, Austin J. Simms, is hereby authorized to submit this Annual Plan to the U.S. Department of Housing and Urban Development for approval. 4/18/2034 Date

Joan Whitman

Chairperson, Board of Commissioners

Recommendation: It is the recommendation of the Lexington Housing Authority staff that the Board of Commissioners approve the resolution to submit the amended 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.

## RESOLUTION TO APPROVE AND SUBMIT THE FY2025 MTW ANNUAL PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR APPROVAL

WHEREAS, the Lexington Housing Authority, a public housing agency, is a Moving To Work (MTW) Agency under the November 10, 2011, MTW Agreement was executed by the U.S. Department of Housing and Urban Development (HUD) and LHA; and

WHEREAS, in compliance with the MTW Agreement, the fiscal year 2024 MTW Annual Plan was approved by the U.S. Department of Housing and Urban Development on August 9, 2023; and

WHEREAS, the Plan proposes a new activity, Activity 35: Rapid Housing Initiative to Reduce Vacancies of Hard to Lease Units, to address vacant units that are difficult to lease at public housing properties; and

WHEREAS, the Plan states the LHA's intention to advertise and lease these units with a separate waiting list and take referrals from community partners, and allow self-certification from the applicant; and

WHEREAS, the Plan requires that all applicants are required to meet program qualifications for the property; and

WHEREAS, the Plan significantly modifies previously approved activities - Activity #27: HCV Portability Restrictions, Activity and #28: HCV Alternate Certification Schedule; and

WHEREAS, the Plan's previously approved activities have been modified (non-significantly) – Activity 25 – HCV – Allow Excluded Income to Make Units Affordable, and Activity 32 – HCV Landlord Incentives; and

WHEREAS, LHA invited public comment on the proposed FY 2025 MTW Annual Plan through notices posted on its website and advertised in the local newspaper and social media allowing for a 30-day comment period (March 18 through April 17, 2024) with a public hearing held on March 28, 2024; and

WHEREAS, this Annual Plan will be submitted to HUD for review upon approval by the LHA Board of Commissioners;

NOW, THEREFORE, BE IT RESOLVED BY THE LEXINGTON-FAYETTE URBAN COUNTY HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY2025

MTW Annual Plan is approved and that the Executive Director, Austin J. Simms, is hereby authorized to submit this Annual Plan to the U.S. Department of Housing and Urban Development for approval.

Joan Whitman

Chairperson, Board of Commissioners

to submission of the revised Moving To Work Plan.

Recommendation: It is the recommendation of the Lexington Housing Authority staff that the Board of Commissioners approve the resolution to submit the FY 2025 Moving to Work Annual Plan to HUD. Furthermore, Austin J. Simms shall be authorized to execute all documents related

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

#### CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with Regulations:

Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning 07/01/2024 ), 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-50073.1 (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 1984, the Fair Housing Act, section 384 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1998.
- (3) The Pien is consistent with the applicable comprehensive hausing afforcability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will effirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.13(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 3.150 through 3.160, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (a) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR S.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 133.
- (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 labbying required by 24 CFR Part 97, tagether with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1978 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).
- (15) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- [19] The MTW PHA will comply with the Leag-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of DMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Lexington-Fayette Urban County Housing Authority	KY004		
MTW PHA NAME	MTW PHA NUMBER/HA CODE		
I hereby certify that all the information stated herein, as well herewith, is true and accurate. Warning: HUD will prosecute criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012;	false claims and statements. Conviction may result in		
Austin J. Simms	Executive Director		
NAME OF AUTHORIZED OFFICIAL	TITLE		
am 1 De	4-18-2024		
SIGNATURE	DATE		

Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or

Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

#### **B. DOCUMENTATION OF PUBLIC PROCESS**

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

The public comment period was March 18 – April 17, 2024.

An ad announcing the public comment period/public hearing ran in the Lexington Herald-Leader March 18 2024.



#### PUBLIC HEARING ANNOUNCEMENT

Lexington-Fayette Urban County Housing Authority (LHA) will hold a Public Hearing regarding: the proposed FY 2025 Moving to Work (MTW) Annual Plan; the amended FY 2024 MTW Plan; and revisions to the Housing Choice Voucher (Section 8) Administrative Plan, Public Housing Admissions & Continued Occupancy Policy (ACOP) and the Ballard Apartments ACOP.

The public hearing will be held on Thursday, March 28, 2024 at 5:30 PM via Zoom video conferencing. Attendees may register in advance by calling Michele Lee at (859) 281-5060. Accommodations for disabled or non-English speaking persons will be made available upon advance request.

The subject of the meeting will be the proposed FY 2025 MTW Annual Plan that includes one new activity and three significantly modified activities as well as the amended FY2024 MTW Annual Plan that includes one new activity and proposed modifications to the Housing Choice Voucher (Section 8) Administrative Plan, Public Housing ACOP, Ballard Apartments ACOP.

#### LHA welcomes public comment regarding these changes from March 18 - April 17, 2024.

Complete copies of the affected documents (and a summary of proposed changes) have been posted on the LHA website (www.lexha.org), available for public viewing at LHA's Central Office, or can be mailed upon request. Written comments should be addressed to Michele Lee at LHA's Central Office or emailed to leem@ lexha.org. For additional information, call (859) 281- 5060. Persons with hearing or speech impairments can receive assistance contacting the LHA by dialing 7-1-1 to reach the Kentucky Telephone Relay Service. IPL0164621

Mar 18 2024

#### Request for Qualifications and Proposals for Architectural/ Engineering services for Pendleton County Volunteer Fire Station via Pendleton County **Fiscal Court.**

Location: Pendleton County, KY Start Date: 03/18/2024 Question Submission Deadline:

04/05/2024 Question Response Deadline:

04/11/2024

Close Date: 04/18/2024, 4pm

Contract Award: Approximately two weeks after the last April Fiscal Court meeting

The Pendleton County Fiscal Court is seeking statements of qualifications and proposals from consultants possessing the skill and personnel to provide the County with engineering services for the construction of a new fire station.

Background

The Pendleton County Fiscal Court recently acquired property located at 2663 Hwy 27 N Falmouth, KY 41040 with the intent of building a new fire station. This fire station shall be one floor with multiple bays. Contact: David Fields, County Judge/

Executive Email: pendletoncountyjudgeexec@

gmail.com Address: Pendleton County Fiscal Court, 233 Main St

Falmouth, KY 41040 IPL0164711 Mar 18 2024

Mar 18 2024

#### NOTICE

REQUEST FOR PROPOSAL KEN-TUCKY EMPLOYERS' MUTUAL IN-SURANCE (KEMI) 250 W. Main St., Ste 900, Lexington, KY 40507, is accepting proposals for Asset Custody Services and Letters of Credit. If you would like further information or a copy of the RFP, please contact Sarah Kosin at rfp@kemi.com or visit www. kemi.com/rfp. IPL0164135

#### KENTUCKY.COM

Available 3-28-24 at 9:00 am. lic bidders may bid on these units. Public units will be announced on the block. Registration & \$1,000 deposit required to enter.

ADESA 672 Blue Sky Pkwy, Lexington,

KY 40509 835877 - 11 Maxima, 181507 - 17 C 300, 086338 - 08 Rav4, 534650 - 16 Forte, 287637 - 15 Outback, 933213 - 15 Camry, 127919 - 10 Taurus, 152670 - 16 Equinox, 456502 - 14 Maxima, 022657 - 13 A4, 169409 - 16 Altima, 501876 - 19 Rogue, 222068 17 Malibu, 268478 - 16 Sentra, 317720 - 16 Cherokee, H75219 - 21 X3, 355938 - 19 Sentra, A35717 21 Bronco, 461373 - 19 Cherokee, 369888 - 14 Rio, 243603 - 17 Accent, 682530 - 17 Sentra, A07994 - 15 Explorer, 197600 - 11 Impala, 507787 14 Titan, 233223 - 20 Altima, 188463 20 Journey, 128128 - 14 Lacrosse, C63954 - 13 Edge, 136438 - 14 Equinox, 140774 - 12 Lacrosse, 105319 - 18 Cruze, 044189 - 16 Accent, 101541 - 08 Mazda3, 103775 - 18 Cruze, 258172 - 13 Optima, 001679 14 Odyssey, 652185 - 12 Beetle, 444479 - 15 Optima, 292983 - 16 Focus, 556505 - 08 Ram 1500, A49971 16 Transit-150, 346975 - 16 Grand Caravan IPL0164633

#### Invitation to Bid

Mar 18 2024

Notice is hereby given by the Lexington-Fayette Urban County Govemment that bids will be received until 2:00 pm, local time at the LFUCG procurement website, lonwave (below), for: Bid 33-2024 Firefighter Turn Out Gear (4/1/24 at 2:00) and Bid 41-2024 Wildwood Park Sidewalk Improvements (4/1/24 at 2:00). Only online bids will be accepted for this solicitation. Additional information may be obtained at https://lexingtonky.ionwave.net or by calling (859) 258-3320. IPL0164600 Mar 18 2024

HERALD-LEADER

### LHA Public Hearing Agenda Thursday, March 28, 2024 5:30 p.m.

Welcome/Overview of Public Hearing			
Introductions			
THE CAUCHO IS			
Overview of Short-Term Goal Michele Lee			
Overview of FY 2025 New/Modifications MTW Activities			
FY2024 MTW Annual Plan Amended  • New Activity #34: Local Non-Traditional –  Targeted Housing Initiative			
HCV (Section 8) Administrative Plan Revisions			
Public Housing Admissions and Continued Occupancy Policy (ACOP)			
Ballard Apartments Admissions and Continued Occupancy Policy			
Adjournment			

### LHA Public Hearing Attendance Sheet Thursday, March 28, 2024

Sean Cooper Chief Financial Officer

Renee Christian Housing Manager

Cathy Hall Housing Manager

Michele Lee Contracts, Grants and MTW Manager

Dana Mason Housing Manager

LaCoya Hardin Housing Manager

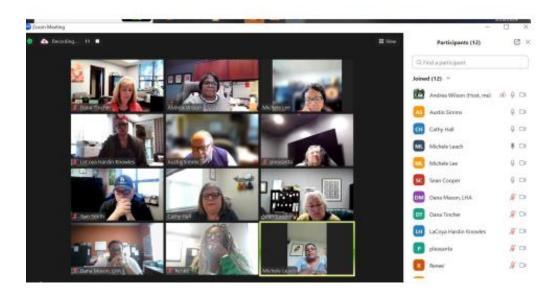
Aldean Pleasant Section 8 Manager Austin Simms
Executive Director

Tom Smith
Facilities Manager/Development
Manager

Michele Leach LHA Resident

Andrea Wilson LHA Chief Operating Officer

#### LHA Public Hearing Zoom Video Conference Call 5:30 p.m. Thursday, March 28, 2024



#### Public Hearing Participant – Michele Leach Questions/Comments:

Ms. Leach indicated that she only had three (3) concerns:

- 1) Utility Allowance Question: Is the allotment the same for those that pay electric and gas or just one allotment?
- Cathy Hall, Housing Manager Responded: The utility allowance is based on the appliances in the unit. The allowance could vary based on electric only or electric and gas.
- 2) Ms. Leach referenced the earlier mention of Versailles Road development. Will Public Housing tenants have the opportunity to transfer or apply?

  Austin Simms, Executive Director responded: We can't answer this this point because we haven't decided what we will build. We estimate 50+ units, but right now as you are aware, we are tied up with the neighborhood opposition. We don't know whether it will be public
  - we are tied up with the neighborhood opposition. We don't know whether it will be public housing/ project based/unit/market rate/combination. We just don't know at this time. When we know, you could apply.
- 3) Recertifications: Ms. Leach recently had a recertification and wanted to know if you were 62 or older if you only had to be recertified every three (3) years if over income or on flat rent. Cathy Hall responded that if a tenant was on flat rent, the recertification was annual. If the tenant was 62 it was every three (3) years. Dana Mason, Housing Manager, clarified that HUD requires if the tenant was 62 or older and on flat rent, the current policy is the annual recertification.

#### 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.

Disclosure of Lobbying Activities

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

(See reverse for public burden disclosure)

1. Type of Federal Action: a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. Status of Federal Action: a. bid/offer/application b. initial award c. post-award		3. Report Type: a. initial filing b. material change  For material change only: Year quarter Date of last report
4. Name and Address of Reporting E Prime Subawardee Tier, if	•		orting Entity in No. 4 is Subawardee, and Address of Prime:
Congressional District, if known:  6. Federal Department/Agency:	NOT	7. Ewler of Pur	gram Name/Description:
8. Federal Action Number, if known 10, a. Name and Address of Lobbying (if individual, last name, first had	Re-estrant	S	
11. Information requested through this for title 31 U.S.C. section 1352. This disclosuractivities is a material representation of furcliance was placed by the tier above when was made or entered into. This disclosure is pursuant to 31 U.S.C. 1352. This information the Congress semi-annually and will be inspection. Any person who fails to file the disclosure shall be subject to a civil penalty \$10,000 and not more than \$100,000 for ea	e of lobbying et upon which this transaction is required on will be reported available for public required of not less than	Print Name:	Date:
Federal Use Only		Authorized for Le Standard Form -	ocal Reproduction LLL (Rev. 7-97)

### **Certifications of Payments to Influence Federal Transactions**

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

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

Certification of Payments to Influence Federal Transactions

Previous edition is obsolete

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

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:				
<ol> <li>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.</li> <li>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-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.</li> </ol>					
Name of Authorized Official	Title				
Austin J. Simms	Executive Director				
Signature 0 - AS	Date (mm/dd/yyyy) 4/18/2024				