Louisville Metro Housing Authority

Moving to Work Annual Plan

Fiscal Year 2015

July 1, 2014 – June 30, 2015

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I. Introduction

Generally, Public Housing Agencies (PHAs) will include short-term and long-term MTW goals and objectives in this section.

The Louisville Metro Housing Authority (LMHA), formerly known as the Housing Authority of Louisville, is a nonprofit agency responsible for the development and management of federally assisted housing in the Louisville Metro area. In 2003, Louisville Metro Mayor Jerry Abramson and the Louisville Metro Council approved the merger of the Housing Authority of Louisville and Housing Authority of Jefferson County, thereby creating the Louisville Metro Housing Authority. A nine-member Board of Commissioners, appointed by the Metro Mayor, serves as the policy making body of the Agency.

LMHA presently manages over 3,300 units in two family housing communities, five housing communities for disabled and senior citizens, and a growing number of scattered site properties. Additionally, the Agency administers public housing assistance for over 700 public housing units located at mixed-income and mixed-finance sites that are privately owned and managed and administers rental assistance to nearly 8,400 families under its leased housing program. By June 30, 2015, LMHA anticipates providing housing assistance to more than 13,200 households in the combined public housing and leased housing programs.

Funding for the agency's operation comes from rental income and annual operating subsidy from the U.S. Department of Housing and Urban Development (HUD). The agency also receives Capital Improvement funds on an annual basis from HUD. Periodically, the agency also applies for funds from HUD and the City's Community Development Block Grant (CDBG) program to finance various modernization improvements.

Moving To Work Demonstration Program

Louisville Metro Housing Authority, then the Housing Authority of Louisville, became one of a small group of public housing agencies participating in the Moving to Work (MTW) Demonstration Program in 1999. The MTW program authorized by Congress and signed into Law as part of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, offers public housing authorities (PHAs) the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families. The program allows exemptions from existing low-income public housing (Section 9) and Section 8 rules, and it permits LMHA to combine public housing operating, capital, and rental assistance funds into a single agency-wide funding source.

Under the MTW program, LMHA creates and adopts an annual Moving to Work plan that describes new and ongoing activities that utilize authority granted to LMHA under the MTW Agreement. This plan focuses primarily on the Public Housing, Housing Choice Voucher (HCV) and Capital Fund programs, as these are the LMHA programs that fall under MTW. The annual plan also focuses on newly proposed MTW activities and MTW activities that are ongoing. In addition, it contains a limited amount of information about LMHA's non-MTW initiatives such as public housing site improvements and resident self-sufficiency programs. The MTW Annual Report - prepared at the end of the fiscal year - is an update on the status and outcomes of those activities included in the Annual MTW Plan.

MTW Objectives

Moving to Work is a demonstration program that allows Public Housing Authorities (PHAs) to design and test ways to achieve three statutory goals. Each one of LMHA's MTW activities must achieve at least one of the statutory objectives:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;
- Give incentives to residents, especially families with children, to obtain employment and become economically self-sufficient; and
- Increase housing choices for low-income families.

At the inception of LMHA's status as a Moving to Work agency, LMHA carefully evaluated its own goals and objectives against those of the demonstration. The outcome was six long-term goals for LMHA's participation in the MTW program.

Locally Defined LMHA MTW Goals

These goals, as outlined in the FY 1999 Annual MTW Plan, are locally-driven refinements of HUD's objectives:

- Increase the share of residents moving toward self-sufficiency;
- Achieve a greater income mix at LMHA properties,
- Expand the spatial dispersal of assisted housing;
- Improve the quality of the assisted housing stock;
- Reduce and/or reallocate administrative, operational and/or maintenance costs; and
- Enhance the Housing Authority's capacity to plan and deliver effective programs.

Since that time LMHA has recognized a growing number of populations with specific needs that often go unmet by existing housing and support service infrastructure. The Agency has revised and updated its goals to reflect changes in the local community and the evolution of the HUD MTW demonstration into a performance-driven program. In addition to the goals above, LMHA has set the goal to:

- Develop programs and housing stock targeted to populations with special needs, especially those families not adequately served elsewhere in the community.

Proposed and Ongoing Moving To Work Activities

An MTW activity is defined as any activity LMHA engages in that requires MTW flexibility to waive statutory or regulatory requirements. For 2015, LMHA is proposing three **new** MTW activities:

- A Special Referral Housing Choice Voucher program with Seven Counties Services, Inc. for adults with severe mental illness who participate in supportive services offered by the local the Assertive Community Treatment team (42-2015); and
- A HUD-sponsored Rent Reform Study in the Housing Choice Voucher program.

Following HUD approval of the FY2014 Annual MTW Plan, LMHA executed the First Amendment – Use of MTW Funds - to its MTW Agreement with HUD. In FY 2015, using the newly granted authority, LMHA proposes to implement:

- An agreement with YouthBuild Louisville (YBL) to allow the organization to sublease public housing units to low-income participants enrolled in YBL's job-readiness programs (29-2015);

In addition, LMHA has a variety of MTW activities that will be **ongoing** in fiscal year 2015:

- A financial aid deduction for all households, regardless of age (40-2014); and

- A 2% cap on annual Section 8 contract rent increases (39-2014).

- Special referral Housing Choice Voucher programs that provide rental assistance to families at Center for Women and Families and Family Scholar House while they live onsite and portable vouchers upon graduation (1-2005, 15-2009, 20-2010, 31-2012, 38-2013);

- An initiative that detaches Section 8 homeownership payment standards from traditional HCV payment standards (3-2006);

- A two-year recertification process of elderly families and <u>all</u> families whose head of household or cohead is disabled (4-2007). In FY14, LMHA amended this activity to include creation of a local Privacy Authorization form that allows 24 months between re-verifications;

- An earned income disregard for elderly families in the Housing Choice Voucher program (6-2008);

- A standard medical deduction for all elderly and disabled families in the Public Housing and HCV programs (8-2008);

- Term limits and Education/Work requirements for highly desirable New Scattered-Site single-family units (9-2009). In FY 2014, as part of the Education/Work requirements, LMHA used MTW authority to define work as employment of 2,000 hours annually at a minimum wage job (9-2007);

- A local definition of elderly as families whose head of household or cohead is age 55 or over at LMHA's elderly and disabled high-rises (10-2008);

- An exception payment standard for the HCV Homeownership program (13-2009);

- Simplified procedures to acquire and develop new public housing properties (18-2009);

- Mandatory case management for residents at New Scattered Site single-family homes (21-2010);

- Lease-up incentives for new residents at Dosker Manor as part of an effort to improve occupancy rates at the development (23-2010);

- Authority to acquire properties for public housing without prior HUD approval to expedite acquisition of units in mixed-income communities (26-2011);

- Amendment of the Housing Choice Voucher admissions policy to allow for deduction of child-care expenses in determination of eligibility (27-2011);

- A set of locally defined guidelines for development, maintenance and modernization of public housing development (28-2011);

- A local preference to provide voucher assistance to persons referred by Day Spring, a program that offers adults with intellectual disabilities support services in a residential setting (7-2008);

- A Special Referral Housing Choice Voucher program with the 100,000 Homes Initiative (31-2012);

- Elimination of the mandatory Earned Income Disregard (EID) (32-2012);

- A Public Housing rent policy to set rent payments at 30% of adjusted annual income (33-2012);

- A local preference to provide voucher assistance to persons referred by Wellspring with developmental disabilities who wish to live independently at its Youngland facility (34-2012) and the Bashford Manor facility (36-2013);

- Authority to allocate MTW Housing Choice Vouchers to special referral programs with service-enriched housing providers (35-2012);

Following HUD approval of the FY2014 Annual MTW Plan, LMHA executed the First Amendment to its MTW Agreement with HUD. Called the Use of MTW Funds Amendment, it allows the Housing Authority to expend funds on activities that fall outside of Section 8 and Section 9 of the 1937 Housing Act. Using this authority, LMHA has implemented:

- An agreement with Frazier Rehab Institute to allow them to sublease two fully-accessible units at Liberty Green Community Center to low-income families enrolled in their Spinal Cord Injury outpatient rehabilitation program (37-2014). This activity was originally proposed in the 2013 Annual MTW Plan; however, it was determined that LMHA would need Use of MTW Funds authority (which the agency did not yet have at the time). The activity was included and approved in the FY 2014 Annual MTW Plan Amendment.

Over the course of its participation in the MTW demonstration, LMHA has proposed one activity via the annual plan process that has not been approved by HUD:

- Special Occupancy Requirements (Elderly Only) for Floors 1-9 of Building C at Dosker Manor. HUD determined that LMHA should apply for these requirements through HUD's established designation process.

LMHA has two MTW activities that were previously proposed and approved, but have not been implemented yet;

- Streamlined demolition and disposition application process for MTW Agencies (16-2009); and

- An agreement with Catholic Charities for emergency temporary housing for victims of human trafficking (25-2010);

- Public Housing Development Standards; and

- Homeownership Maintenance Specialist staff position.

Finally, LMHA has closed out [three] initiatives and has a number of activities that use the single-fund budget authority only. The closed out initiatives are:

- Limiting the concentration of Housing Choice Voucher assisted units in complexes of one hundred or more units to 25% (excluded both elderly/disabled and special referral program sites) (5-2007);
- Increased flat rents at New Scattered Sites (24-2010); and
- A flexible third-party verification policy for the HCV Homeownership program (11-2009).

The activities that use single-fund budget authority only are:

- Homeownership Maintenance Specialist (*planning*) (12-2009);
- MultiCultural Family Assistance Program (*ongoing*) (17-2009)
- HCV Homeownership Weatherization and Energy Efficiency Pilot (*completed*) (19-2010)
- Avenue Plaza CFL Trade-in Program (*completed*) (22-2010);

Moving to Work (MTW) Activity Matrix

#	Fiscal Year	MTW Activity	Status
43	***2015***	***HUD/MDRC Rent Reform Demonstration for HCV Households***	***Proposed***
42	***2015***	***Special Referral MTW Voucher Program with Seven Counties Services, Inc.***	***Proposed***
41	2014	Special Occupancy Requirements for Floors 1-9 of Building C at Dosker Manor	Proposed, Not Approved
40	2014	Financial Aid Disregard in Calculation of TTP – HCV Program	Ongoing
39	2014	MTW Section 8 Rent Increase Limit	Ongoing
38	2013	Special Referral HCV Program – Parkland Scholar House	Ongoing
37	2013, 2014	Public Housing Sublease Agreement with Frazier Spinal Cord Rehab Institute	Proposed, Not Approved, Approved ’14, Ongoing
36	2013	Special Referral MTW HCV Program and Local Preference – Wellspring at Bashford Manor/Newburg	Ongoing
35	2012	Allocate MTW Housing Choice Vouchers to Special Referral Programs	Ongoing
34	2012	Special Referral MTW HCV Program and Local Preference – Wellspring at Youngland Avenue	Ongoing
33	2012	Rents Set at 30% of Adjusted Income - Public Housing Program	Ongoing
32	2012	Elimination of the Earned Income Disregard	Ongoing
31	2012	Special Referral HCV Program - Stoddard Johnston Scholar House	Ongoing
30	2012	Special Referral HCV Program – 100,000 Homes Initiative	Ongoing
29	***2011***	***Public Housing Sublease Agreement with YouthBuild Louisville***	***Proposed, Not Approved, Re-proposed ’15***
28	2011	Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing	Planning
27	2011	Amend Public Housing and HCV Program Admissions Policy to Allow for Deduction of Child-Care Expenses in Determination of Eligibility	Ongoing
26	2011	Acquisition of Mixed-Income Sites for Public Housing	Ongoing
25	2010	Public Housing Sublease Agreement with Catholic Charities	Approved, Tabled
24	2010	Increased Flat Rents for New Scattered Sites	Approved, Ended
23	2010	Lease-up Incentives for New Residents at Dosker Manor	Ongoing
22	2010	CFL Trade-in Pilot Program for Avenue Plaza Residents	Completed
21	2010	Occupancy Criteria Changes for New Scattered Sites - Mandatory Case Management	Ongoing
20	2010	Special Referral HCV Program - Downtown Family Scholar House	Ongoing

Moving to Work (MTW) Activity Matrix Cont.

#	Fiscal Year	MTW Activity	Status
19	2010	Weatherization and Energy Efficiency Pilot and Section 8 Homeownership	Completed
18	2009	Simplification of the Public Housing Development Submittal	Ongoing
17	2009	Multicultural Family Assistance Program	Ongoing
16	2009	Streamlined Demolition and Disposition Application Process for MTW Agencies	Tabled
15	2009	Special Referral HCV Program - Louisville Scholar House	Ongoing
14	2009	Center for Women and Families at the Villager - Determinations for Program Eligibility	Non-MTW
13	2009	HCV Homeownership Program – Exception Payment Standards	Ongoing
12	2009	Housing Choice Voucher Program Maintenance Specialist	Planning
11	2009	HCV Homeownership - Flexibility in Third-Party Verifications	Ongoing
10	2008	Locally Defined Definition of Elderly	Ongoing
9	2007	Term Limits and Employment/Educational Work Requirements for New Scattered Sites; MTW Definition of Work (Revised FY 2014)	Ongoing
8	2008	Rent Simplification for Public Housing and Housing Choice Voucher Programs - Standard Medical Deduction	Ongoing
7	2008	Special Referral MTW HCV Program and Local Preference - Day Spring (Renewed 2012)	Ongoing
6	2008	Rent Simplification in the HCV Program - Earned Income Disregard for Elderly Families	Ongoing
5	2007	Spatial Deconstruction of HCV Assisted Units	Ended
4	2007	Rent Simplification for PH and HCV Programs - Alternate Year Reexaminations of Elderly and Disabled Families (Amended 2012, 2014)	Ongoing
3	2006	Amount and Distribution of Homeownership Assistance	Ongoing
2	1999	MTW Inspections Protocol	Ongoing
1	2005	Special Referral HCV Program - Center for Women and Families	Ongoing

Short and Long Term MTW Plan

The mission of the Louisville Metro Housing Authority is to provide quality, affordable housing for those in need, assist residents in their efforts to achieve financial independence, and work with the community to strengthen neighborhoods. In implementing these goals, LMHA will, in the **short term**, focus on implementing its MTW Annual Plan. In the **long term**, LMHA will continue to focus on the following initiatives:

Reposition and redevelop the conventional Public Housing stock

The physical stock of the remaining original family developments owned and managed by LMHA needs to be completely redeveloped. These sites – large, dense, urban and often isolated – need major renovation or replacement. LMHA's goal is to transform these communities in the coming years, replacing the current public housing developments with mixed income communities, while at the same time providing replacement units so that the overall number of families served will not decrease. In the elderly developments, modernization efforts will proceed with an eye toward appropriate and expanded service provision.

In 2014 the Housing Authority intends to apply for a Choice Neighborhoods Planning Grant from HUD to support development of a comprehensive neighborhood transformation plan for the Russell Neighborhood and the Beecher Terrace public housing development. Other HUD subsidized housing in the neighborhood may be included as part of the application. If the grant is awarded, the effort will focus on directing resources to address the three core goals of HUD's Choice Neighborhood programs: housing, people, and neighborhoods. To achieve these goals, Russell Neighborhood residents and partners, including the Louisville Metro Housing Authority, who would be the lead applicant, would utilize up to $500,000 in financial support provided by the planning grant to develop a comprehensive neighborhood Transformation Plan. This Plan would serve as the guiding document for directing the transformation of the Russell neighborhood and distressed HUD subsidized housing within those boundaries, including the public housing at Beecher Terrace. The duration of the planning grant and deadline for completion of the Transformation Plan is up to two years. Implementation of the Plan would be contingent on procuring and raising adequate funding.

Increase housing choice through stronger rental communities and options, and expanded homeownership opportunities.

Homeownership is an important housing choice option for many low-income families, and is an appropriate program given the local market. LMHA's nationally recognized Housing Choice Voucher Homeownership Program is an affordable and secure way for LMHA families to achieve self-sufficiency. The Agency can boast that together more than [150] Public Housing residents and HCV program participants have purchased homes through the program. For the many other families for whom homeownership isn't a viable option, LMHA will look at its Public Housing communities to see what policy and program changes might strengthen those communities and make them better places to live.

Develop programs and housing stock targeted to populations with special needs not adequately served elsewhere in the community.

MTW allows LMHA to break from HUD established "norms" and therefore maximize the potential of locally available resources to develop programs for people with specific needs. The goal is to meet needs not met by other agencies and to partner with local organizations that have social services programs that need a housing support element. Some of these needs will be transitional; others are for programs that provide more long-term support, particularly for single parents with children where the parent is working or preparing for work by participating in educational programs and young people enrolled in job and college prep programs. Developing comprehensive initiatives in these areas will continue to require

regulatory relief. In FY2014, LMHA submitted a successful application to HUD for Broader Use of MTW Funds authority, an Amendment to Attachment D of the Agency's MTW Standard Agreement with HUD. The Use of MTW Funds amendment gives LMHA the authority to use MTW funds for purposes other than those specified in Section 8 and Section 9 of the 1937 Housing Act, provided such uses are consistent with other requirements of the MTW statute and have been proposed in the Agency's Annual MTW Plan and approved by HUD.

Encourage program participant self-sufficiency

The MTW agreement allows LMHA to reinvent the FSS program to make it appropriate to local program participant needs. The Demonstration also allows LMHA to rethink other policies – like the rent policy for Clarksdale HOPE VI replacement scattered sites – to encourage families to work towards housing self-sufficiency.

II. General Housing Authority Operation Information

Generally, this section is a pre-formatted Microsoft Excel table provided by HUD for PHAs to report the required housing stock, leasing and waitlist information. HUD has asked PHAs to copy and paste the HUD provided Microsoft Excel tables into the body of this Section (II) in their Plan/Report. With the initial submittal of each Plan/Report to HUD, the PHA will also include the completed, separate Microsoft Excel file.

II.1.Plan.HousingStock

A. MTW Plan: Housing Stock Information

Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
KY001000058 Sheppard Square Rental A,C,D	0	0	61	29	1	0	0	91	General	17	0
KY001000054 Sheppard Square Off-site Replacement Units	0	0	0	0	0	0	0	25	General	0	0
KY001000055 Wilart Arms Apts	0	2	10	3	0	0	0	15	General	1	0
KY001000059 Stoddard Johnston Scholar House	0	0	2	2	0	0	0	4	Other	0	0

Total Public Housing Units to be Added 135

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

If Other, please describe: The population type for Stoddard Johnston Scholar House is Program-specific. Applicants must meet Family Scholar House (FSH) program eligiblity requirements as well as Public Housing eligibility requirements. FSH qualified families include heads of households, and their dependent children, whose annual gross income does not exceed HUD's Section 8 income limits. The head of household must have a high school diploma or GED and be willing to enroll in a degree-granting program at an accredited post-secondary institution as a full-time student. Eligibility is limited to low-income families including no more than one adult family member.

Planned Public Housing Units to be Removed During the Fiscal Year		
PIC Dev. # / AMP and PIC Dev. Name	**Number of Units to be Removed**	**Explanation for Removal**
KY001000034 Scattered Sites	1	MSD has made an offer to purchase a unit from LMHA because the property is within the newly defined 100-yr flood plain.
PIC Dev. # /AMP PIC Dev. Name	0	N/A
PIC Dev. # /AMP PIC Dev. Name	0	N/A
Total Number of Units to be Removed	1	

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	**Anticipated Number of New Vouchers to be Project-Based ***	**Description of Project**
Property Name	0	N/A
Property Name	0	N/A
Property Name	0	N/A
Property Name	0	N/A
Anticipated Total New Vouchers to be Project-Based	0	

Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	0
Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	0

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year
LMHA anticipates units being held off-line in its Public Housing Scattered Sites, in particular AMP KY 1-034, which includes units at The Friary. LMHA purchased the historic structure several years ago and has used it as public housing; however, recently, the site has been emptied because the structure is in need of a comprehensive rehabilitation. The architecture and engineering firm on contract with the Housing Authority completed pre-design work in fiscal year 2013. While the historical significance of the building and its proximity to Liberty Green compel the Agency to embark on rehabilitation as quickly as possible, funds for the project are limited, so the project is on hold for now. LMHA will explore options, including Mixed-Finance and utilization of its Use of MTW Funds authority, in order to partner with a private developer who is interested in redeveloping the site. In addition, several units contained in this AMP are being held open due to fire damage. Information about repairs of these units is provided above, under "General Description of Capital Expenditures during the Plan Year".
Wilart Arms Apartments (formerly known as Hallmark Plaza Apartments) is a Mixed-Finance initiative of the Kentucky Housing Corporation (KHC), LMHA, the Housing Partnership, Inc. (HPI), and HUD'S Federal Housing Administration (FHA) "Office of Multifamily Housing" (Multifamily Housing). The property is a 66-unit multi-family complex located off Dixie Highway in the Shively community. In 2007, the owners of Wilart Arms were delinquent on their loan. Also, the building had fallen into severe disrepair, and had been placed on HUD's troubled Multifamily Assets listing. In an effort to prevent the property from going into foreclosure and to preserve the housing complex, including project based Section 8, KHC reached out to Multifamily Housing for a possible solution. The solution was modeled on the work of other jurisdictions where such properties had been disposed of to the local Public Housing Authorities. KHC's proposal – a cooperative effort among KHC, Louisville Metro Housing Authority (LMHA) and the Housing Partnership, Inc. – was approved by Mulitfamily Housing and closed on April 29, 2010 with all participants except for LMHA. **Under the approved proposal, Housing Partnership, Inc. would renovate the site, reduce the density (originally 100 units), and own and manage the property. LMHA would acquire the use of 15 units at the property through Mixed-Finance development. LMHA and Wilart Arms Apartments, LLLP (Owner) would enter into a Regulatory and Operating Agreement and a Declaration of Restrictive Covenants (Declaration of Trust) would be recorded in favor of HUD. With board approval, LMHA agreed to fund a $1,016,678 Promissory Note, for which owner is obligated to house public housing eligible residents in 15 units (2 one-bedroom units, 10 two-bedroom units and 3 three-bedroom units). Two of the units are also be accessible to persons with hearing and/or visual impairments. Of the remaining 51 units at Wilart Arms, 11 units are under the Tax Credit Assistance Program and 40 units**
Stoddard Johnston is a Mixed-Finance initiative of Family Scholar House (FSH) and the Louisville Metro Housing Authority. LMHA intends to acquire 4 units of public housing at the site.
Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures During the Plan Year
Narrative general description of all planned capital fund expenditures during the Plan year (by development) **Parkway Place (KY 1-003)** Gym/Community Center Improvements, $31,373 California Day Care Water Damage, $22,386 **Iroquois Homes (KY 1-005)** Demolition of Gym, Day Care and Management Office, $288,420 **Dosker Manor (KY 1-012)** Trash Chute Doors in 3 Bldgs., $25,000 **550 Apartments (KY 1-014)** Reinstall Heat and Chill Pipe Installation, $44,300 **Scattered Sites (KY 1-017 and KY 1-034)** Siding at 1529 West Magazine Street, $65,000 Siding at 1491 Bland St #2, $15,000 Repair Fire Damage at Noltemeyer Unit, $100,000 Repair Fire Damage at 1171 South 6th Street, $60,000 Repair Fire Damage at 518 East Breckinridge Street, $183,000 Replace HVAC at Del Maria, $172,800 Replace HVAC at Bland, $56,200 Replace Roof at 1518 Magazine Street, $15,000 **Will E. Seay Plaza (KY 1-018)** Reinsulate Heat and Chill Piping, $54,800

II.2.Plan.Leasing

B. MTW Plan: Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/ Leased***
Federal MTW Public Housing Units to be Leased	3819	45828
Federal MTW Voucher (HCV) Units to be Utilized	9192	110304
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	2	24
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
Total Households Projected to be Served	13013	156156

* Calculated by dividing the planned number of unit months occupied/leased by 12.

** 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 PHA should estimate the number of households to be served.

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

N/A

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions	
Housing Program	**Description of Anticipated Leasing Issues and Possible Solutions**
Public Housing AMP KY001000034	LMHA anticipates vacancies in the Public Housing Scattered Sites, in particular AMP KY 1-034, which includes units at The Friary. LMHA purchased the historic structure several years ago and has used it as p+D64ublic housing; however, recently, the site has been emptied because the structure is in need of a comprehensive rehabilitation. The architecture and engineering firm on contract with the Housing Authority completed pre-design work in fiscal year 2013. While the historical significance of the building and its proximity to Liberty Green compel the Agency to embark on rehabilitation as quickly as possible, funds for the project are limited, so the project is on hold for now. LMHA may partner with a private developer who is interested in redeveloping the site. In addition, several units contained in this AMP are being held open due to fire damage. Information about repairs of these units is provided above, under "General Description of Capital Expenditures during the Plan Year".
Public Housing Mixed-Population Developments, including: Dosker Manor, Saint Catherine Court, Will E. Seay Plaza (formerly Bishop Lane Plaza), and Avenue Plaza	LMHA had been experiencing lower than normal occupancy rates at many of its mixed population high-rises, therefore, LMHA used its MTW authority to reduce the age of elderly to 55. Consequently, rates have improved steadily since HUD's approval of the locally defined definition of elderly. Due to ongoing issues with occupancy rates at Dosker Manor, an exceptionally dense site containing three high-rises for elderly and disabled families, LMHA is offering a lease-up incentive. Also, LMHA will continue to consider whether an official elderly and/or disabled-only designation of one or more buildings at the site is appropriate. Recent gun violence at Dosker Manor, including a fatal double shooting, compels the Housing Authority to seek Emergency Safety and Security Grants Annual Funding.
N/A	**N/A**

II.3.Plan.WaitList

C. MTW Plan: Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Housing Choice Voucher Program	Community-Wide	17448	Open	No
Federal MTW Pubic Housing (LMHA Owned-and-Managed Sites)	Community-Wide	3578	Open	No
Federal MTW Public Housing (Liberty Green)	Site-Based	667	Open	No
Federal MTW Public Housing (Park DuValle)	Site-Based	2759	Open	No
Federal MTW Public Housing (The Oaks at Park DuValle)	Site-Based	550	Open	No
Family Scholar House (Federal MTW Public Housing Program and Federal MTW Hosuing Choice Voucher Program)	Merged/Program Specific	881	Open	No
Federal MTW Public Housing (Referral List for Scattered Sites)	Program Specific	184	Open	No

Rows for additional waiting lists may be added, if needed.

* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types* : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

N/A
N/A

If Local, Non-Traditional Housing Program, please describe:

N/A
N/A

If Other Wait List Type, please describe:

N/A
N/A
N/A

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

LMHA is in the process of updating its Public Housing Admissions and Continued Occupancy Plan (ACOP) and the Section 8/Housing Choice Voucher (HCV) Administrative Plan. As updates are made, the changes will be made available for public comment, discussed at public hearing, and submitted to LMHA's Board of Commissioners for approval.

III. Proposed MTW Activities: HUD approval requested

Proposed MTW Initiative – Special Referral Voucher Program with Seven Counties Services, Inc. (Activity #42-2014)

A. Description of the Activity
LMHA will provide up to 50 vouchers to low-income families referred through Seven Counties, Inc.'s Assertive Community Treatment (ACT) team. Assertive Community Treatment is an Evidenced Based Practice approved by the Substance Abuse and Mental Health Services Administration (SAMHSA) designed to engage persons with a Severe Mental Illness (SMI) whose needs are not met by traditional outpatient services. Services are delivered in the context and environment where they are needed (i.e. the team goes to the person).

Housing assistance will be provided to households that are referred to the Housing Authority by the ACT team. Households must also meet basic Section 8 eligibility criteria. The amount of housing assistance the household receives will be determined according to traditional Section 8 rules as modified through HUD-approved Moving to Work initiatives.

Services provided by the ACT team are flexible and are available to families 7 days per week. Services include case management, individual and group therapy, nursing services, medication management, psychiatric services, supported employment, peer support and payee services. Crisis services are available 24 hours per day via an on-call system. The services are ongoing and are not time limited. Qualifying individuals will remain in this program until they have stabilized enough to tolerate and benefit from traditional outpatient services.

Referrals to the team will come from Metro Corrections, Emergency Psychiatry, Central State Hospital, regional personal care homes, other local agencies serving high risk homeless persons with a SMI and the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID). Funding is provided by DBHDID. The priority population is adults with a severe mental illness who are currently institutionalized at a personal care home or at risk of being institutionalized because of a lack of adequate community support. Those persons originally from Jefferson County but placed in a personal care home in another region of the State will be considered for return to the Louisville area.

The ACT team will be able to serve a total number of 80 to 100 clients by the end of the second year of implementation. Access to affordable housing is an integral component to a person's ability to recover, work and integrate into the community of his or her choice. The team will be available to support the person and provide services as needed on site to increase the likelihood of personal success. Special program vouchers will provide the needed foundation for accessing adequate housing. Providing 50 vouchers for persons receiving ACT services will be a significant step toward meeting their housing needs. The ACT team will be part of Seven Counties Housing First program which includes the Homeless Outreach Team and already provides daily in-home support services to 41 adults with a SMI who live in apartments throughout Metro Louisville.

Lack of on-site support is one of the primary reasons this priority population has been unsuccessful in achieving sustained psychiatric stability in the past. Assertive Community Treatment will fill this gap and assist the program participants in achieving and maintaining community integration.

B. Relation to Statutory Objectives
This activity will increase housing choices for adults with a severe mental illness who are currently institutionalized at a personal care home or at risk of being institutionalized because of a lack of adequate

community support. It will also help achieve greater cost effectiveness in federal expenditures by using the voucher to leverage supportive services for families with specific needs. The services are designed to help these individuals achieve their self-sufficiency goals.

C. Impact on Stated Objectives
This activity will increase local housing choices for low-income families with a severe mental. Also, the activity will use vouchers to leverage supportive services for low-income families with specific needs. With access to quality services and the voucher, LMHA and Seven Counties expect that families will be more likely to achieve sustained psychiatric and housing stability.

D. Anticipated Schedule for Achieving the Stated Objectives
The ACT team will be able to serve a total number of 80 to 100 clients by the end of the second year of implementation. LMHA estimates that 40 of these clients will be receiving voucher assistance. By the end of year three, utilization of the voucher set-aside should be at 100% (i.e., 50 vouchers leased).

E-I. Activity Metrics Information

Complete baseline and benchmarks for this initiative will be established as households are enrolled under this activity and their information is collected.

Cost Effectiveness #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	0	Variable -depends on client needs	tbd	tbd
				Explanation to be provided
Data Source(s): Seven Counties, Inc.				

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
	Average gross annual income from the number of elderly HCV households before implementation	Expected average gross income from the number of elderly HCV households as of 6/30/15	Actual average gross income from the number of elderly HCV households as of 6/30/15	Explanation to be provided
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may	Expected percentage of total work-able households in <<category name>> after implementation of the activity	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Explanation to be provided.

	be zero.	(percent).		
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	20	tbd	tbd

				Explanation to be provided
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Housing Choice #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	5-7 years	0	tbd	tbd

				Explanation to be provided
Data Source(s): Housing Authority records.				

Additionally, LMHA and Seven Counties, Inc. will track the supplemental information shown below:

Utilization Metrics	**Baseline FY14**	**Outcome FY15**	**Outcome FY16**	**Outcome FY17**
No. of vouchers administered at FYE	0	*tbd*	*tbd*	*tbd*
No. of months of sustained aggregate housing	0	*tbd*	*tbd*	*tbd*
No. served during the fiscal year	0	*tbd*	*tbd*	*tbd*
No. who left treatment during the fiscal year	0	*tbd*	*tbd*	*tbd*
No. in the program at fiscal yearend	0	*tbd*	*tbd*	*tbd*
Supplemental Self-Sufficiency Metrics (Aggregated Data)				
No. of months homeless	*tbd*	*tbd*	*tbd*	*tbd*
No. of psychiatric hospitalizations	*tbd*	*tbd*	*tbd*	*tbd*
Supplemental Self-Sufficiency Metrics (Aggregated Data)	*tbd*	*tbd*	*tbd*	*tbd*
No. of months homeless	*tbd*	*tbd*	*tbd*	*tbd*
No. of psychiatric hospitalizations	*tbd*	*tbd*	*tbd*	*tbd*
No. of arrests	*tbd*	*tbd*	*tbd*	*tbd*
No. of days incarcerated	*tbd*	*tbd*	*tbd*	*tbd*
No. of days in a PCH or NH	*tbd*	*tbd*	*tbd*	*tbd*
No. of presentations to EPS	*tbd*	*tbd*	*tbd*	*tbd*

LMHA will track information related to voucher utilization. Seven Counties Services, Inc. will provide family information upon request.

J-K. Authorizations Cited and Explanation
Attachment C, Section D.4 regarding Section 8 Housing Choice Vouchers Waiting List Policies. This authorization allows the housing authority to determine waiting list procedures, tenant selection procedures, criteria and preferences that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. In implementing this activity, LMHA will provide a preference to families referred by Seven Counties, Inc.'s Assertive Community Treatment (ACT) team.

L. Information for Rent Reform
This MTW activity does not involve any change to the regulations found in 24 CFR 960 or 24 CFR 982 Subpart K. Accordingly, it is not a rent reform activity and the additional information requirement is not applicable.

Proposed MTW Initiative – Broader Use of MTW Funds: Public Housing Sublease Agreement YouthBuild Louisville (Activity #29-2015)

A. Description

The activity is an agreement with YouthBuild Louisville to allow YBL to sublease public housing units temporary housing for low-income program participants who are experiencing homelessness. LMHA will lease up to three 2-bedroom apartments for participants (and their families) and facility space for the YouthBuild program. Units will be provided to YouthBuild Louisville on an as needed basis.

For unemployed young people who left high school without a diploma, YouthBuild is an opportunity to reclaim their educations, gain the skills they need for employment, and become leaders in their communities. YouthBuild Louisville serves low or very-low income youth, ages 16-24, who have dropped out of high school or are basic skills deficient, and, are a foster care recipient or have aged out of care, and/or a youthful or adult offender, a youth possessing a disability and/or a child of an incarcerated parent or a migrant youth. They are trained in small cohorts of 35 youth each year with one additional year of job placement, higher education assistance, community mentoring, and social service support. These youth dedicate full-time efforts to education (50%) green home construction and/or pre-nursing certification training (40%) and community development tasks in the Smoketown neighborhood (10%). Youth receive individual and group education to complete their GED and/or high school diploma and pre-college curriculum while all gain construction skills through the Homebuilders Institute Pre Apprenticeship Certificate Training (PACT) with additional elective certification in green construction, weatherization and facilities maintenance and pre-nursing certification (30) through the American Red Cross and Norton Healthcare. Students are involved in hands-on construction activities as they complete one (1) new single family homes and (4) rehabilitated homes for low income families in the Smoketown and Shawnee neighborhoods of Louisville, weatherize over 25 homes for low-income residents providing 450 hours of service as an AmeriCorps Education Award volunteer.

Participant housing is not a traditional component of a YouthBuild program. For many students, maintaining stable housing is not a struggle; however some participants are homeless or may become homeless. The sublease agreement between YBL and LMHA will ensure that these young people have a place to call home so they are able to make the most of this unique learning opportunity.

Each month the unit or units is/are occupied by a YBL program participant, YBL will pay LMHA $60/unit. YBL will certify that students are income eligible upon entry to program through application and follow-up verification through local, state subsidy programs. The participant and their household may continue to live in the unit as long as they are active in the YBL program. Upon graduation, the household may elect to receive preference for either a Section 8 voucher or Public Housing unit.

YBL will place participants in the subleased unit upon proof of homelessness. If a student has a family (children), the unit will not be shared. If the participant is single, the unit may be shared with up to three other participants in a dormitory style arrangement (2 students per bedroom). The participant will pay their portion of the monthly rent through a payroll or stipend deduction from their trainee benefit (up to $400/month). The amount of rent for each participant family will not exceed $60/month or 15% of the maximum monthly stipend. Each participant family will make a minimum contribution of $15/month. Finally, each subleasee will sign a contract with YBL committing to expectations and conduct while in the public housing unit.

All participants residing in the subleased public housing units must meet basic Public Housing program eligibility criteria (no outstanding rent balance with LMHA or other public housing authority, criminal

background check, age 18 or older). LMHA staff will verify that the YBL program participant is eligible for this MTW initiative.

YouthBuild Louisville participants will also receive preference for the regular Public Housing or the Housing Choice Voucher program, their choice, upon graduation from the YBL program. All Public Housing or Section 8 program eligibility criteria must be met at that time.

B. Relation to Statutory Objectives

This activity increases housing choices for families enrolled in self-sufficiency programs. It uses public housing as an incentive for young people to enroll in the YouthBuild Louisville job training program, which increases their chances of becoming self-reliant.

C. Anticipated Impact on the Stated Objectives

Louisville Metro Housing Authority is the local agency responsible for all Public Housing and Section 8 programs. The Agency has worked with YouthBuild Louisville over the last several years to provide housing and other services to participants in the program and their families. Through this initiative, LMHA and YBL will increase housing options for participant families who are participating in YBL's programs.

YouthBuild aids unemployed and undereducated young people, ages 18 to 24, through a program that builds affordable housing for homeless and low-income families in their own communities. Program participants split their time between the construction site and the classroom, where they earn their GED or high school diploma, learn to be community leaders, and prepare for jobs or college. Since 1993, over 10,000 units of low-income housing have been produced by over 25,000 YouthBuild students. In 2003, 180 YouthBuild programs across America involved 6,500 young adults. Nationwide, 85% of YouthBuild students enter the program without their high school diplomas and 29% receive public assistance prior to joining YouthBuild. In spite of these overwhelming odds, 60% of students complete the program and 83% of graduates go on to college or jobs averaging $7.79/hour.

The partnership also matches YBL's services, which are valued at $20,000 per participant (including stipends) with housing assistance.

D. Anticipated Schedule for Achieving the Stated Objectives

The objective of increasing housing choices for low-income participants enrolled in YouthBuild Louisville's programs will be achieved in the first year the activity is implemented.

E-I. Activity Metrics Information

Baselines will generally be determined when households enrolled in the program execute a sublease agreement.

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
	Average gross annual income from the number of elderly HCV households before implementation	Expected average gross income from the number of elderly HCV households as of 6/30/15	Actual average gross income from the number of elderly HCV households as of 6/30/15	Explanation to be provided
Data Source(s): Emphasys and YouthBuild Louisville				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

(6) Other	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Explanation to be provided.
Data Source(s): Emphasys and YouthBuild Louisville				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	8	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys LIB and YouthBuild Louisville.				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided. **Self-Sufficiency for this activity** is defined as a household that graduates from the program and goes on to find jobs, additional job training and/or enroll in an associates or bachelors degree program within 6 months.	Households transitioned to self sufficiency prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency after implementation of the activity (number).	Actual households transitioned to self sufficiencyafter implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys Elite and Seven Counties, Inc.				

Housing Choice #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a *better unit and/or neighborhood of opportunity as a result of the activity (increase). *Better unit is defined as a unit at one of the sites covered by the activity.	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	8	tbd	tbd
	Annual *number* of households able to move to a better unit and/or neighborhood of opportunity prior to implementation.	Expected *number* of households able to move to a better unit and/or neighborhood of opportunity 7/1/14 thru 6/30/15.	Actual *number* of households able to move to a better unit and/or neighborhood of opportunity 7/1/14 thru 6/30/15.	Explanation to be provided

Data Source(s): Emphasys LIB; PHA financial records

J-K. Authorizations Cited and Explanation
First Amendment to the Standard Agreement – Uses of Funds. Allowing an organization, like YouthBuild Louisville to sublease Public Housing units is an activity that falls outside of Sections 8 and 9 of the 1937 Housing Act.

L. Information for Rent Reform
This MTW activity is authorized under Broader Use of MTW Funds. Accordingly, it is not a rent reform activity and the additional information requirement is not applicable.

Proposed MTW Initiative – HUD/MDRC Rent Reform Demonstration for HCV Households (Activity #43-2015)

The Louisville Metro Housing Authority (LMHA) has been selected to participate 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 and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally.

The complete activity description is following.

Louisville Metro Housing Authority
MTW Activity: Housing Choice Voucher (HCV) Rent Reform Study

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Introduction

Louisville Metro Housing Authority (LMHA) has been selected to participate 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 and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency
- Simplify the administration of the HCV Program
- Reduce housing agency administrative burden and costs
- Improve accuracy and compliance of program administration
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under current rules
- Improve transparency of the program requirements

A computer generated program will randomly select the participants for the Study from the pool of eligible vouchers. Participants in the Rent Reform Group and the Control Group will be randomly selected from the eligible voucher programs by a computer generated program. The Alternative Rent Group vouchers (approximately 1,000 vouchers) will be managed using the proposed policies. The Control Group vouchers (also approximately 1,000 vouchers) will be managed using the current policies. Vouchers eligible for the Study will include only those with vouchers that are administered under the Moving To Work (MTW) Program and not currently utilizing a biennial certification. Non-MTW Vouchers (i.e., Veterans Assisted Special Housing, Moderate Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and HUD Project Based Vouchers are excluded from the Study. Additionally, the Study is focused on work-able populations and will not include Elderly Households; Disabled Households, and households headed by people older than 56 years of age (who will become seniors during the course of the long-term study). Households currently utilizing the childcare expense deduction for purposes of determining adjusted annual income as well as households participating in Family Self Sufficiency and Homeownership programs will not be included in the Study. In addition, households that contain a mix of members with an immigration status that is eligible for housing assistance and immigration status that is non-eligible for housing assistance would not be included in the Study. Finally, households receiving case management or supportive services through one of the Housing Authority's MTW Special Referral Programs will not be eligible to participate in the Study.

Households selected for the Alternative Rent Group will receive an opportunity to meet with a LMHA Housing Specialist to review the Study and their specific calculation of Total Tenant Payments under both the traditional and Study policies. They will have a period of thirty days to consider whether to select to be excluded from the Study.

I. Description of Rent Reform Components

The Study is designed to test an alternative strategy to standard HUD operating rules for the HCV program. The proposed alternative rent policies will include the following five key features:

1) Simplify income determination and rent calculation of the household's Total Tenant Payment (TTP) and subsidy amount by:
   a) Eliminating deductions and allowances,
   b) Changing the percent of income from 30% of adjusted income to a maximum of 28% of gross income,
   c) Ignoring income from assets when the total household asset value is less than $25,000, and
   d) Using retrospective income, i.e., 12-month "look-back" period and, in some cases, current/anticipated income in estimating a household's TTP and subsidy.
   e) Capping the maximum initial rent burden at 40% of current gross monthly income.

2) Conduct triennial income recertification rather than annual recertification with provisions for interim recertification and hardship remedies if income decreases.

3) Streamline interim certifications to eliminate income review for <u>most</u> household composition changes and moves to new units.

4) Require the Tenant Rent to Owner is the greater of TTP (see #1 above) or the minimum rent of $50. A portion of the Family Share will be paid directly to the landlord.

5) Simplify the policy for determining utility allowances.

Additionally, the Study will offer appropriate hardship protections to prevent any Alternative Rent Group member from being unduly impacted as discussed in Section V below.

A. Description of the Rent Reform Activity

1) **<u>Simplified Income Determination and Rent Calculation</u>**

   Under the current HUD regulations, the total tenant payment (TTP) is a calculation derived from the voucher household's 30% adjusted monthly income (gross income less HUD prescribed exclusions and deductions and allowances). LMHA follows a process of interviewing the household to identify all sources of income and assets, then proceeds to verify the information and perform the final calculation. The process is complex and cumbersome, which increases the risk of errors. According to HUD's Occupancy Handbook, Chapter 5 "Determining Income and Calculating Rent," the most frequent errors found across Public Housing Agencies (PHAs) are: Voucher holders failing to fully disclose income information; errors in identifying required income exclusions; and incorrect calculations of deductions often resulting from failure to obtain third-party verification. The complexity makes the HCV program less transparent and understandable by the public, landlords, and voucher holders.

   a) <u>Elimination of Deductions</u>

      LMHA proposes a new method of calculation which eliminates the calculation of deductions and allowances in the determination of annual income.

b) Percent Annual Gross Income.
The Total Tenant Payment (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 $50.

c) Elimination of Income from Assets with household total value less than $25,000
LMHA will eliminate the verification and calculation of income earned from household assets with total value less than $25,000. Households would not be required to document assets worth less than that amount. This will reduce administrative costs and simplify the program for greater transparency and program compliance.

d) Review of Retrospective Income.
To establish annual gross income for the three year certification period, LMHA will review the total household income without deductions for a twelve-month period prior to recertification, i.e., the "Retrospective Income." A household's TTP will depend on its *Retrospective Income* during a 12-month "look back" period.

At the certification, if a household's current/anticipated income is less than its retrospective income by more than 10%, a "temporary" TTP based on current income alone will be set for six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average retrospective income. No interim recertification interview would be required to reset this TTP.

e) Capping The Initial Maximum Rent Burden
HUD places a rent maximum for households moving into a new unit under the housing choice voucher subsidy. This maximum rent burden is determined to be 40% of the household's adjusted annual income. However, under the Rent Reform Study the PHA will no longer be adjusting household income using deductions and allowances. The household must not pay more than 40 percent of gross current monthly income for rent when the family first receives voucher assistance in a particular unit. (This maximum rent burden requirement is not applicable at reexamination if the family stays in place.)

2) **Triennial Certifications**
Generally, LMHA currently performs re-certification of HCV households on an annual basis. The annual 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.

LMHA proposes performing re-certification of the Alternative Rent Group every third year (triennial). The triennial certification will review program eligibility, household composition, current income and income over the past twelve months ("retrospective income"), unit information and shall set the Total Tenant Payment (TTP) and the family share of the gross rent. The TTP for Alternative Rent Group members will remain in effect during the three year certification period, with some exceptions related to decreases in income and changes in household composition.

Under the alternative rent policy, a household's TTP will generally be calculated using its reported (and verified) *retrospective gross income* during a 12-month "look-back" period. (In this calculation, gross income will exclude any prior income from sources that have

expired for the household during that period, such as TANF 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 grant).

LMHA will create a local form to supplement the HUD form 9886 to provide tenant consent for LMHA to collect information relevant to the triennial recertification period.

If the household has an increase in annual income between certifications, the household's TTP will not be re-determined and increased to reflect the higher income. However, if the household has a decrease in annual income, the household may request and LMHA may provide an interim re-certification or other remedies under the hardship process (see Section V). The interim re-certification will be conducted when a household has a reduction of retrospective gross income of more than 10% from the retrospective gross income used to establish the current TTP.

a) At the interim certification, LMHA will re-calculate the household Total Tenant Payment (TTP) based on a new retrospective gross income review to determine the greater of 28% gross income or the minimum rent of $50. 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 will last twelve months from the effective date of the certification.

b) At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated income is less than its retrospective gross income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.

c) Alternative Rent Group members will be allowed one request per year for an interim certification to reset their TTP. The year will last twelve months from the effective date of the certification. The TTP will only be reset if a household's new retrospective gross income (at the time of the request) is more than 10% lower than its most recent prior retrospective monthly income. If the limit on interim certification presents a hardship, the household will need to apply for a Hardship Exemption (See Section V below).

3) **Streamline Interim Certifications**

LMHA will institute a streamlined interim certification process for Alternative Rent Group members to report change of circumstance that does not require adjustment in subsidy. For these events, LMHA will not request income information. These events include:

a) Changes to household composition. Alternative Rent Group members must report both additions and removal of members to the household to LMHA to determine program eligibility and other HUD required reporting (e.g. deceased tenant reporting). However, unless the addition of an adult member changes the voucher bedroom size appropriate for the household composition to prevent overcrowding or over-housing, LMHA will not request income information for the new household member until the next scheduled triennial certification.

If the loss of a household member results in a reduction of more than 10% of the most recent retrospective gross 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, LMHA will review the retrospective gross 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 implemented when the current lease ends and new lease begins.

Changes to household composition will not be counted towards the limit of one requested interim certification per year.

b) 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, LMHA 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. However, unless the request for move is due to a change in household composition, LMHA will not request income information or reset the household TTP until the sooner of the next scheduled triennial certification or tenant requested interim certification to reset TTP. LMHA will apply new utility allowance schedule, if any, to the household at the new lease effective date.

c) 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:
- Change their contract rent,
- Recertify and the TTP is recalculated during interim or triennial,
- Move to new units, or
- Change their household composition requiring a change in voucher size.

4) **Minimum Rent to Owner**

Currently, HUD does not require minimum rents to be paid by the voucher holder to the landlord. LMHA is proposing that the Alternative Rent Group will be required to make a minimum payment of at least $50 direct to the HCV landlord in addition to LMHA's portion of rent (Housing Assistance Payment "HAP"). The total amount of rent will equal the contract rent established in the lease. This policy mirrors the market system of tenants paying owners directly and creates a closer relationship and sense of responsibility for both the leaseholder HCV household and the property owner.

The amount of rent to owner the Alternative Rent Group will pay is equal to their TTP less the Utility Allowance plus any amount over the payment standard for which the tenant may be responsible to pay. The Alternative Rent Group rent to owner will not be less than the minimum rent. In the event that the Alternative Rent Group household TTP less the Utility Allowance is less than the minimum rent, the household will pay the Owner the minimum rent and LMHA will reimburse the household the balance of the Utility Allowance. However, in the event that the minimum rent to owner exceeds 40% of the household current anticipated gross income, the household may request a Hardship Waiver as detailed in Section V below.

5) **Simplified Utility Allowance Schedule**.
Currently, LMHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents the reasonable expectation of costs for utilities as part of the tenant's lease.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from LMHA's existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the triennial certification or change of unit.

LMHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying the Utility Allowance Schedule. The simplified utility allowance schedule is also anticipated to benefit property owners who will have a more accurate understanding of the gross rent to be applied to their properties and to the Alternative Rent Group member who will be able to use this new schedule to clarify gross rent in their selection of housing units.

This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher rather than the larger of the actual unit size or the voucher size. LMHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

Proposed Simplified Utility Allowance Schedule

Bedroom Size	Type of Energy/Service	0BR	1BR	2BR	3BR	4BR	5BR	6BR	7BR	8BR
Base Allowance All Unit Types	**All types**	**73**	**92**	**111**	**129**	**157**	**175**	**198**	**219**	**278**
Add-on: Water Heat	**Electric**	**5**	**7**	**8**	**11**	**13**	**16**	**18**	**19**	**21**
	Oil	**19**	**26**	**23**	**41**	**52**	**60**	**67**	**75**	**82**
Add-on: Heat	**Electric**	**0**	**0**	**0**	**5**	**10**	**14**	**16**	**17**	**19**
	Oil	**34**	**53**	**72**	**91**	**119**	**139**	**157**	**174**	**191**
Add-on: Water/Sewer	**All-Types**	**38**	**47**	**63**	**80**	**101**	**120**	**135**	**151**	**166**
Add-on: Stove	**Tenant Supplied**	**5**	**5**	**5**	**5**	**5**	**5**	**5**	**5**	**5**
Add-on: Refrigerator	**Tenant Supplied**	**5**	**5**	**5**	**5**	**5**	**5**	**5**	**5**	**5**

B. Achieving Statutory Objectives

1) **MTW Objective: To reduce administrative cost and achieve greater costs effectiveness in Federal expenditures.**

   a) Simplified Tenant Rent Calculation
   This activity will provide LMHA with immediate savings of staff hours from the calculation of deductions, allowances, and income from household assets valued at less than $25,000. Households would not be required to document assets worth less than that amount. This activity will also provide LMHA with saving in staff hours from detecting and correcting errors calculating the adjusted annual income.

   b) Triennial Certification Schedule and Streamline Interim Certification
   These re-certification schedules will provide LMHA with immediate savings of staff hours and agency resources associated with the recertification processes.

   c) Minimum Rent/TTP
   This activity sets the minimum rent to $50 which is above HUD's current optional minimum rent of $50 and the agency's current minimum rent of $0. This minimum rent will reduce some HAP subsidy and save federal funds.

   d) Simplified Utility Allowance
   This activity will provide LMHA with cost savings from staff hours spent on detecting and correcting errors made when applying the utility schedule based on voucher size, household structure, appliances, and other factors.

2) **MTW Objective: To assist families achieve greater self-sufficiency by allowing families to keep this income to increase savings and attain greater self-sufficiency.**

   a) Simplified Tenant Rent Calculation
   The elimination of income from household assets valued less than $25,000 will enable Alternative Rent Group members to use this income as a means to attain greater self-sufficiency rather than increasing their portion of the rent.

   b) Triennial Certification Schedule
   This activity will enable Alternative Rent Group members to keep increases in income between the certification periods that would otherwise be "lost" through higher TTPs. As a result, it is expected to increase participants' employment rates and earnings and help them attain greater self-sufficiency.

C. Anticipated Impact on the Stated Objectives

1) **Simplified Rent Calculation**
   This activity will provide LMHA with immediate savings of staff hours through an easier calculation in regular certification meetings and interim recertification meetings and save staff from having to detect and correct errors in calculating adjusted income. Also this will increase transparency of how the tenant's share of shelter costs are computed.

2) **Triennial Certification**
   This activity will provide LMHA with immediate savings of staff hours and save tenants time as well through having fewer recertification meetings and income verifications. Also for tenants this will act as a powerful incentive to increase employment and earnings; tenants will be able to increase earnings between regular certifications without increases in their TTP and without having to report these increased earnings to LMHA.

3) **Streamline Interim Certification**
This activity will provide LMHA with savings in staff hours through eliminating income verification in some instances that would require it now. Also the streamlined certifications help to maintain the employment and earnings incentive offered in the 3-year recertification schedule.

4) **Minimum Rent to Owner**
This activity will increase self-sufficiency of tenants by establishing a traditional tenant-landlord relationship in which all tenants will be required to pay some portion of the rent directly to the landlord. This also may help with housing quality by establishing a traditional relationship where the tenant and landlord are interacting more and make the tenant feel more able to ask for repairs on the unit.

5) **Simplified Utility Allowance**
This activity will provide LMHA with cost savings from staff hours spent calculating utility allowances for each household and save time from detecting and correcting errors made when using a more complex utility schedule. This will also increase the transparency of the utility allowance calculation, enabling a better understanding of how their total subsidy is calculated.

D. Anticipated Schedules for Achieving the Stated Objectives

Once the MTW Activity is approved, participants will be identified for enrollment in the Rent Reform Group and the Control Group. The enrollment process for the Rent Reform Group and Control Group will begin approximately in September of 2014 and end no later than August 2015. The Triennial recertification process for the groups will begin in September 2017 and end no later than 2019. Further information on the enrollment process is provided in Section VII – Transition Process.

1) **Simplified Rent Calculation**
Alternative Rent Group members will be enrolled during their regularly scheduled certification meeting and presented with the simplified approach to rent calculation. This policy is intended to create simplicity and greater understanding of how the household portion of rent is determined.

The Agency will receive immediate benefits of staff time savings by not performing verification processes for the standard deductions and allowances which will no longer be applied to the Alternative Rent Group members.

2) **Triennial Certification**
Participants will have the initial baseline triennial certification performed at the initial enrollment meeting. Participants will not participate in a recertification until three years after this initial certification, unless they request an Interim Certification or a Hardship Waiver.

Administrative cost savings to LMHA will be achieved in the second year of the Study at which time LMHA will conduct the annual recertification for the control group and will bypass the Alternative Rent Group members.

3) **Streamline Interim Certification**
This activity limits the ability of Alternative Rent Group members to request interim certifications to reset the household TTP to no more than once per year and only when the reduced retrospective household income more than 10% than the retrospective income used to determine the TTP. Alternative Rent Group members may request interim certifications to report changes in household composition throughout the three year Study period. These recertifications will be streamlined and may exclude reexamination of household income or redetermination of household TTP.

The streamlined certification activity is anticipated to result in a cost savings to LMHA within the first year of implementation because there will be a reduced number of interim certifications for changes in household income and streamlined processes to handle changes in household composition and request-to-move certifications.

4) **Minimum Rent to Owner**
The requirement for the voucher holder to pay a minimum rent to owner will begin with the effective date of the initial Study enrollment certification. This first triennial certification will determine the Total Tenant Payment, which will be the greatest of 28% of the household gross income or the newly established minimum rent (as described above).

However, the final benefit of this activity may not be assessed until the second triennial certification to determine whether the Alternative Rent Group members were able to achieve higher earnings and thereby reduce the amount of subsidy.

5) **Simplified Utility Allowance**
The Simplified Utility Allowance will begin at the time of enrollment in the Study. The Alternative Rent Group members will have the new utility allowance applied at the time of their initial triennial certification and thereafter at each triennial certification or certification for a move to a new unit. This activity is intended to create simplicity and greater understanding by the household of the utility allowance. It will benefit both the tenant and prospective landlord by establishing the allowed rate prior to selecting a unit. The Agency will receive immediate benefits of staff time savings by not creating and having to correct errors discovered in the application of the utility allowances.

II. Activity Metrics

A. HUD Standard Metrics

The information in the table shaded blue represents information intended for guidance; while the information in non-shaded boxes represents LMHA specific information. For the purpose of this section, year one represents the first fiscal year where activities are implemented.

CE #1: Agency Cost Savings		
Unit of Measurement	**Baseline**	**Benchmark**
Total cost of task in dollars.	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
Cost per Annual Certification	Baseline is equal to $54,920.00: • **Cost per Annual Certification** of $54.92 • *times* the number of Alternative Rent Group members. (1,000 households) **Cost per Annual Certification** equal to $54.92, which is: • Hard cost (the mail and reproduction costs) ($4.78 per certification) • *plus* **Staff Cost** of $50.14 **Staff Cost** is equal to $50.14: • Average time spent per annual interview/ verification/quality control (2 hours) • *times* the average staff cost per hour. ($25.07/hr.)	For years two and three of the activity, the benchmark is $0.00, which is equal to: • Baseline *less* • the number of Alternative Rent Group members (1,000 or less) *times* the **Cost per Annual Certification** of $0.00 *For* year **four of the activity, when the Triennial cert**ification takes place, the benchmark is equal to: • Number of Alternative Rent Group members (TBD) • *times* the reduced **Cost per Annual Certification** due to shortened time spent on recertification. (TBD)
Cost per Interim Certification	Baseline is equal to: $50,140.00 • **Cost per Interim Certification of** $37.61***times* average number of interims per household** *per ye*ar (2x) • *times* the number of study participants in the Rent Reform group. (1,000) **Cost per Interim Certification** is equal to ($37.61), which is: • Average time to perform an interim (1.50 hr) • *times* the average cost per staff hour. ($25.07/hr)	Benchmark is equal to: $62,675.00 • **Cost per Interim Certification** per household per year ($25.07) • *times* the average of .5 interims per household in Rent Reform Group • *times the size of the Rent Reform Group (1,000 households)* • *plus* the average number of moves or family composition changes anticipated per year per household (which is 2x) *times* the size of the Rent Reform Group, which is 1,000 households.

Unit of Measurement	Baseline	Benchmark
Cost per Streamlined Interim	Baseline is equal to ($50,140.00): • **Cost per Interim** ($25.07) • *times* average number of interims per household per year (2 interims/household/year) • *times* the number of Alternative Rent Group members. (1,000 households) **Cost per Interim** is $37.61, which is equal to: • Average time to perform an interim (1.50 hr.) • *times* the average cost per staff hour. ($25.07/hr.)	Benchmark is equal to: $25,070.00 • Cost of one streamlined interim, which is $25.07 • *times* the number of households in the Rent Reform Group (1,000 households) **Cost per Streamlined Interim** is equal to: $25.07 • Average time per income calculation; verification; quality control (1.0 hr.) • *times* the average cost per staff hour of $25.07.
Cost of Rent Calculation	Baseline is equal to: $25,070.00 • Cost of Rent Calculation, which is $25.07. • *times* the number of Alternative Rent Group members. (1,000 households) **Cost of Rent Calculation** is equal to $25.07, which is equal to: • Average time for documenting, recording, calculating, verifying and quality control for all income sources (0.50 hr) • *plus* the "C**ost to Determine Adjusted Income."** ($12.54) • **Cost to Determine Adjusted Income** equals $12.54, which is equal to: Average time for all calculations, verifications and quality control for the deductions and allowances to establish the annual adjusted income (0.50 hr.) • *times* the average cost per staff hour. ($25.07/hr.)	Benchmark savings is equal to $12,530.00, which is equal to: • **Cost of Rent Calculation (**$25.07) fill-in with amount shown in column left • *minus* the **Cost to Determine Adjusted Income (**$12.54) fill-in with amount shown in column left • *times* the number of Alternative Rent Group members. (1,000 households)

Unit of Measurement	Baseline	Benchmark
Cost to Determine Income from Assets	Baseline is equal to $50.14, which is calculated by: • The percent of households with income from assets valued at $25,000 or less. (8 households or 8/3664=0.22%) • *times* the **Cost to Determine Income from Assets** ($6.27) • *times* the same percent of the number of Alternative Rent Group members. **Cost to Determine Income from Assets** is equal to $6.27, which is calculated by: • Average time to verify asset, calculate income perform quality control times the cost per staff hour. (0.25 hr x $25.07/hr = $6.27)	Benchmark savings is equal to: • The Baseline • *minus* the percent of Alternative Rent Group with Assets valued at $25,000 or more.
CE #2: Staff Time Savings		
Unit of Measurement	**Baseline**	**Benchmark**
Total time to complete the task in staff hours (decrease).	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).
Time to Complete Annual Certification	Baseline is equal to: 1,500 hr. • **Time to Complete Annual Certification** (1.5 hr.) • *times* the number of study participants. (1,000 households) **Time to Complete Annual Certification** is equal to (1.88 hr.), which is equal to: • Average time spent to send out mail-in packet; review packet; and verify (1.5 hr.) • *Plus* the average time spent to conduct quality control of the annual certification. (0.33 hr.)	Benchmark is equal to1,500: • **Time to Complete Annual Certification** • *times* the number of study participants. (1,000 households) Note: The benchmark will be zero in years two and three of the activity, because there will be no triennial recertification in year two and year three activity. Also, in year one LMHA expects no decrease because families will be certified under both sets of rules.

Time To Determine Tenant Rent	The Baseline is equal to 1,000 hr., which is equal to: • **Time to Determine Tenant Rent** is 1.00hr *times* the number of Alternative Rent Group members. (1,000 households) **Time to Determine Tenant Rent** is equal to 1.00 hr, which is equal to: • Average time for documenting, recording, calculating, verifying and quality control for all income sources (1.00 hr.) • *plus* **Time to Determine Adjusted Income.** (0.50 hr.) **Time to Determine Adjusted Income** is equal to 0.50 hr, which is equal to: • Time for all calculations, verifications and quality control for the deductions and allowances to establish the annual adjusted income. (0.50 hr.)	Benchmark is equal to 500 hr., which is equal to: • The new **Time to Determine Adjusted Income** which is 0.50 hr. • *times* the number of Alternative Rent Group members (1,000 households) • *minus* the baseline of 1,000 hr.
Time to Determine Utility Allowance	Baseline is equal to $250.00, which is equal to: • **Time to Determine Utility Allowance** is 0.25 hr. • *times* the number of study participants. (1,000 households) **Time to Determine Utility Allowance** is equal to: • Time to verify voucher size, unit bedroom size, inspection determination of bedroom size and verify the correct utility allowance is applied. (0.25 hr.)	Benchmark is equal to: • **Time to Determine Utility Allowance** is 5 minutes.

CE #3: Decrease in Error Rate of Task Execution		
Unit of Measurement	**Baseline**	**Benchmark**
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).
Average Error Rate in Determining TTP	Baseline is equal to: • **Average error rate In Determining the TTP** is (PHA%) TBD	Benchmark is equal to: • A decrease in the **Average error rate In Determining the TTP**. TBD
Average Error Rate in Determining Utility Allowance	Baseline is equal to: • **Average error rate In Determining the Utility Allowance** is (PHA %) TBD	Benchmark is equal to: • A decrease in the **Average Error Rate in Determining Utility Allowance**. TBD
SS #1: Increase in Household Income		
Unit of Measurement	**Baseline**	**Benchmark**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).
Average Earned Income of Non-Elderly Non-disabled Households	Baseline is equal to: • **Average Earned Income of Non-elderly Non-disabled Households, which is equal to ($)**	Benchmark is equal to: • Annual increase of 1% in the **Average Earned Income of Non-Elderly Non-disabled Households**.

SS #3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	**Baseline**	**Benchmark**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in in the categories identified below prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in in the categories identified below after implementation of the activity (number).
	Percentage of total work-able households in the categories identified below prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in the categories identified below after implementation of the activity (percent).
Employment Status for (1) Employed Full-Time: (2) Employed Part-Time: (3) Enrolled in an Educational Program: (4) Enrolled in Job Training Program: (5) Unemployed: (6) Other:	Baseline is equal to: The number of the Rent Reform Group heads of households in each of these categories: (1) Employed Full- Time: (2) Employed Part- Time: (3) Enrolled in an Educational Program: (4) Enrolled in Job Training Program: (5) Unemployed: (6) Other: This information is not available. It will be collected during the enrollment period.	Benchmark is equal to: The following changes in the number of heads of households in the Rent Reform Group in each of these categories: (1) Employed Full- Time: (TBD) (2) Employed Part- Time: (TBD) (3) Enrolled in an Educational Program: (TBD) (4) Enrolled in Job Training Program: (TBD) (5) Unemployed: (TBD) (6) Other: (TBD)
	Baseline is equal to: The percentages heads of households of the Rent Reform Group population in each of these categories: (1) Employed Full- Time: (2) Employed Part- Time: (3) Enrolled in an Educational Program: (4) Enrolled in Job Training Program: (5) Unemployed: (6) Other: This information is not available. It will be collected during the enrollment period.	Benchmark is equal to: The following changes in percentages of Rent Reform Group heads of household in each of these categories: (1) Employed Full- Time increase (TBD) (2) Employed Part- Time increase (TBD) (3) Enrolled in an Educational Program increase (TBD) (4) Enrolled in Job Training Program increase (TBD) (5) Unemployed decrease (TBD) (6) Other: (TBD)
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)		
Unit of Measurement	**Baseline**	**Benchmark**

Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).
Households Receiving TANF Benefits	Baseline is equal to households: • Percentage of **Households Receiving TANF Benefits** of total population • *times* the number of Alternative Rent Group members, which is 1,000 households	Benchmark is equal to the number of households: • A reduction of 1% of **Households Receiving TANF Benefits.**
SS #5: Households Assisted by Services that Increase Self-sufficiency		
Self-sufficiency: The ability to obtain and maintain suitable employment. "Employment" means the household must be receiving earned income. "Suitable" is defined as annual earned income equal to or exceeding minimum wage times 2,000 hours, which is equal to $14,500 (minimum wage is $7.25 x 2,000 hours = $14,500). This is also the minimum income requirement for a family to participate in the Housing Choice Voucher Homeownership program. And "maintaining" employment is defined as being continuously employed for at least 1 year. If the Head of household has completed educational milestones within the last 3 months, he/she can meet "maintaining" employment as follows: certification program – 9 months employment in the certified field; associate's degree – 6 months employment in a related field, and; bachelor's degree – 3 months employment in a related field.		
Unit of Measurement	**Baseline**	**Benchmark**
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).
Households Receiving Self-sufficiency Services	Baseline is equal to: • Percentage of **Households Receiving Self-sufficiency Services** currently*times* the number of Alternative Rent Group members. (1,000 households)	Benchmark is equal to: • The same number of **Households Receiving Self-sufficiency Services**.
SS #6: Reducing Per Unit Subsidy Costs for Participating Households		
Unit of Measurement	**Baseline**	**Benchmark**
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).
Average HCV Subsidy for Non-elderly Non-disabled Households	Baseline is equal to: • Average **HCV Subsidy for Non-Elderly Non-disabled Households** is $633.67.	Benchmark is equal to: • Decrease of 1% in the average **HCV Subsidy for Non-elderly Non-disabled Households**.
SS #7: Increase in Agency Rental Revenue		

Unit of Measurement	Baseline	Benchmark
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).
Average HCV Tenant Share for Non-elderly Non-disabled Households	Baseline is equal to: $ 1,051,415 which is the sum of Tenant Shares for the 3,664 Non-elderly, Non-disabled househods • **Average HCV Tenant Share for Non-elderly Non-disabled Households** is $293.77	Benchmark is equal to: • Increase of 1% in the **Average HCV Tenant Share for Non-Elderly Non-disabled Households**.

SS #8: Households Transitioned to Self-sufficiency

Self-sufficiency: "Need Definition" Agency may create one or more definitions for "self-sufficiency" to use for this metric. Each time the metric is used, the "Outcome" number should also be provided in Section (II) Operating Information in the space.

LMHA Definition of Self-Sufficiency: The ability to obtain and maintain suitable employment. "Employment" means the household must be receiving earned income. "Suitable" is defined as annual earned income equal to or exceeding minimum wage times 2,000 hours, which is equal to $14,500 (minimum wage is $7.25 x 2,000 hours = $14,500). This is also the minimum income requirement for a family to participate in the Housing Choice Voucher Homeownership program. And "maintaining" employment is defined as being continuously employed for at least 1 year. If the Head of household has completed educational milestones within the last 3 months, he/she can meet "maintaining" employment as follows: certification program – 9 months employment in the certified field; associate's degree – 6 months employment in a related field, and; bachelor's degree – 3 months employment in a related field.

Unit of Measurement	Baseline	Benchmark
Number of households transitioned to self-sufficiency (increase).	Households transitioned to self-sufficiency (as defined above) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (as defined above) after implementation of the activity (number).
Non-elderly Non-disabled Households Transitioned/ Graduated to Self-sufficiency per Year.	Baseline is equal to: • Percentage of **Non-elderly Non-disabled Households Transitioned/ Graduated to Self-sufficiency per Year Not available.** This information is not currently tracked. It will be collected during the enrollment period. • *times* the number of Alternative Rent Group members of 1,000 households	Benchmark is equal to: • Increase of XX # of **Non-elderly Non-disabled Households Transitioned/ Graduated to Self-sufficiency per Year** TBD after baseline has been set.

B. Source of Data

LMHA will use several sources to obtain the data necessary to evaluate this program.

1) Emphasys LIB is LMHA's system of record. Information related to household income, assets, household composition, unit information will be collected from this system.

2) The E.I.V. system, pay stubs, and, for self-employed individuals, tax returns will be used to verify household income.

3) LMHA Human Resources personnel data will be used to determine the average hourly cost per job title.

4) LMHA will also use a Time Study to record average time spent on certifications and quality control activities to compare the Study policies to the traditional program rules.

    a) The time spent on certifications will include tracking on the average amount of time spent on the scheduling, verification of income, verification of total household assets over $25,000, calculations of deductions and allowances, calculations of utility allowance, calculations of TTP, and Interviews with households (as applicable).

    b) The time spent on quality control will include corrective actions.

5) LMHA will perform Quality Control comparison of study and non-study to determine reduced error rates using data obtained from Section 8 QC Reports.

6) Additional systems will be developed for tracking data and hardship requests.

III. Need/Justification for MTW Flexibility

Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives LMHA the flexibility to conduct the activity.

LMHA Amended and Restated Moving To Work Agreement dated June 25, 2009, Attachment C, provides the authority to conduct rent reform activities. Specifically, Section D Authorizations for HCV only provides the following:

A. Operational Policies and Procedures

Item D. 1 (c) provides LMHA flexibility to define Operational Policies and Procedures. LMHA 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 created in order to adapt the 9886 to reflect a 36-month term between certifications.

B. Rent Policies

Item D. 2 (a) Rent Policies and Term limits. LMHA 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. This

provision 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.

C. Eligibility of Participants

Item D. 3 (b) Eligibility of Participants. LMHA 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 CRR 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. Impact Analysis

A. Description of HCV Rent Reform Activity

A description of the HCV rent reform activity was provided in **Section I - Description of Rent Reform Components.**

B. Tracking and Documenting the Implementation

Information on tracking and documenting the implementation of the HCV rent reform activity is found in **Section II - Activity Metrics**. Additionally, MDRC will obtain information throughout the lifespan of this study for use in a comprehensive assessment of the effectiveness of the rent reform activity.

On an annual basis, LMHA will report the results on the implementation in the annual report. MDRC will issue an interim report on the implementation. At the conclusion of the report, HUD and/or MDRC will report the outcomes of the Study in a comprehensive report.

C. Identifying the Intended and Possible Unintended Impacts

Due to the nature of the project, the financial impacts are addressed comprehensively to reflect the totality of HCV rent reform activity.

1) **Impact on HAP Expenditures under Alternative and Current Rent Policies**

Models developed by MDRC estimate the impact on HAP expenditures over 4 years, with and without a modest employment impact.

Understanding the Table's Format

Table 1 presents the results of this HAP analysis for LMHA. The table shows:

- Estimated HAP payments for each year during the three-year recertification period, and then in Year 4.
- The dollar amount difference and the percent difference in comparing the current rent policy with the new rent policy.

The data in the table includes the following information:

- "Year 1" represents when the new rent policy would begin with an initial income assessment
- "Year 4" represents the year after the next triennial recertification
- For Year 4 and the cumulative years 1-4 two estimates are included:
  - one that assumes that the rent policy has no impact on tenant earnings, and
  - a second that assumes that the policy has a modest impact on tenant earnings.

These estimates are based on all LMHA voucher holders but the dollar amounts have been prorated in order to illustrate a representative subsample of those likely to be in the study. Estimates for HAP under current policy and all Year 4 estimates (under current or new policy) reflect information on all households for LMHA because data on whether a household is working-age or non-disabled and not receiving a child care deduction in year 1 were not available. HAP estimates for Year 1, Year 2, and Year 3 under the new policy were calculated by taking the average of the Lexington housing agency and non-MTW national percent change in HAP (for all households) in each year and using those averages to calculate the differences in dollar amounts.

Background on Change

The alternative rent policy is intended to be roughly *cost-neutral* from the perspective of housing agencies and HUD. This means that the combination of HAP and administrative expenditures should remain about the same as the total expenditures for assisting the same number of voucher holders under the traditional rent policy. Ideally, those expenditures would fall, creating an opportunity to provide housing assistance to more families for the same amount of money.

Interpreting the Potential Impacts

Potential Impact 1: The results show that estimated HAP expenditures are higher under the new policy relative to the current policy in Years 1, 2 and 3 (by 1.9 percent, 7.5 percent, and 8.1 percent, respectively). This is largely because voucher holders who would increase their earnings under the current policy and normally have their housing subsidies reduced would not have their subsidies reduced during this period under the alternative policy's TTP freeze.

Potential Impact 2: However, in Year 4, even assuming that the alternative rent policy did *not* have an impact on tenants' employment and earnings, estimated HAP expenditures under the new rent policy are somewhat lower (4.2%) than under the current policy. This reflects the fact that, on average, TTPs recalculated in Year 4 would be based on higher average earnings, because of normal increases in work and earnings over time (i.e., increases that would have occurred even in the absence of the new policy). It is at the point of the triennial recertification that housing agencies begin to recoup the foregone HAP reductions in the prior years when TTPs were held constant.

Potential Impact 3: HAP expenditures will fall even more in Year 4 (by $622,647) if the new policy *does* have a modest positive impact on household earnings. This impact would push up the income base for setting new TTPs to a higher level than what it would reach under current rules. A higher income base means that households will pay a larger share of their rent and utilities, thus requiring a lower subsidy.

Potential Impact 4: The *cumulative* HAP expenditures for Years 1-4 show that in the absence of an employment impact, those expenditures may be higher under the new rent policy compared with the current policy by 3.2 percent. However, if the alternative policy

has a modest employment impact of the assumed size, LMHA is projected to incur only a marginal cumulative increase in HAP expenditures (1.9 percent).

Table 1
Estimates of HAP Expenditures Under Alternative and Current Rent Policies for All Household Types ($)

				(no employment impact)	(modest employment impact)	(no employment impact)	(modest employment impact)
	Year 1	**Year 2**	**Year 3**	**Year 4**	**Year 4**	**Total, Years 1-4**	**Total, Years 1-4**
New rent policy	6,690,744	6,913,447	6,586,500	6,342,816	5,997,556	26,533,509	26,188,248
Current rent policy	6,562,913	6,433,090	6,091,918	6,620,202	6,620,202	25,708,124	25,708,124
Difference	+$127,832	+$480,357	+$494,582	($277,386)	($622,647)	+$825,385	+$480,124
Percent change	+1.9%	+7.5%	+8.1%	(4.2%)	(9.4%)	+3.2%	+1.9%

2) **Existing deductions and allowances**

Table 2 presents the existing number of households in LMHA receiving deductions and allowances, the percentage of households receiving specific deductions and allowances, and the average dollar amount of those deductions and allowances per household. Note that this table shows existing conditions rather than the potential impact. This table also represents all households and is not restricted to working-age/ non-disabled households.

Background on Change

Under the new policy, deductions and allowances are no longer permitted, making *gross* income the base for determining a household's TTP. Relying on gross income in calculating tenants' eligibility and TTP will simplify the rent-setting process and make it more transparent for both housing agencies and tenants. Child care allowances, in particular, can be burdensome to administer accurately. Under the traditional rent rules, child care allowances are based on *anticipated* unreimbursed child care expenses for the next year (or until the next recertification). Actual costs can be difficult to anticipate, however, particularly for parents who move in and out of jobs, whose child care providers change, whose child care needs change (e.g., if their work shifts change, whose children make a transition to a free pre-school program, or who become eligible for an external child care subsidy during the course of the year. It is not clear how reliably these types of changes are reported to housing agencies between recertification meetings, some of which might result in TTP increases, or decreases. It would be considerably more difficult to estimate *anticipated* child care expenditures under the new rent policy for the entire three-year period until the next triennial recertification. This would likely raise expectations for

housing agencies, as stewards of public monies, to monitor whether actual child care expenditures during that much longer time period actually conformed to the levels anticipated, and to revise tenants' TTPs when they did not. Building a new compliance system to monitor child care expenditures would work against the larger rent reform goal of reducing administrative burdens, and it would create more reporting requirements for tenants.

Interpreting the Potential Impacts

Potential Impact 1: Currently, 93.3 percent of households in LMHA receive at least one deduction. Eliminating deductions and allowances may affect the housing subsidies of some households more than others. For example, those with large families and high deductions for child care costs would likely find that, at their current income levels, their subsidies would be reduced. It should also be noted, however, that only a small percentage of households currently make use of the existing child care allowance –fewer than 9 percent of working-age/non-disabled households in non-MTW agencies (not shown), and fewer than 11 percent in the other housing agencies participating in the demonstration (this information is not available for Louisville). In part, these low rates reflect the fact that many tenants who might benefit from the deductions are not employed. The average annual amount of that deduction among those who use it exceeds $3,100 in the non-MTW agencies (not shown). For the purposes of the Rent Reform Demonstration, all households with a *current* child care deduction will be excluded from the research sample and can continue to receive any qualifying child care deduction.

The new rent policy offers some compensation for this elimination of child care allowances for those who would otherwise qualify for one under current rules. It does this, first, by reducing the percent of income in calculating TTP to 28 percent, and, second, and more importantly, by not raising the TTPs of households that increase their incomes during the period until the next triennial recertification. This will leave families that increase their earnings with more resources to help cover child care costs.

Table 2

Deductions And Allowances

Among Current Voucher Holders

Total number of households	4,582
Income Allowances & Deductions	
Any deductions (%)	93.3
Utility Allowance	
Has utility allowance (%)	95.2
Total monthly average utility allowance if receiving an allowance ($)	167

3) **Impact on Family Share for households with selected characteristics**

Models developed by MDRC estimate the percentage of households that will likely pay a higher "family share" of shelter costs under the alternative rent policy. Assuming no employment impact, the estimated percentages of households with selected characteristics likely to pay a higher family share in year 4 in LMHA is shown below in Table 3.

Background on Change

The alternative rent policy is likely to *reduce* the family share for some households and *increase* it for others. Table 3 shows that certain types of families may be more likely than other families to have a higher family share.

Understanding the Table's Format

Table 3 indicates:

- How prevalent certain types of households are among the total number households (1000), and
- How prevalent those same types of households are among all the voucher holders who would likely experience an increase in family share under the new policy (819).

The estimate for "No Income" reflects information on all households for LMHA because data on whether a household is working-age or non-disabled were not available. All other estimates were calculated by taking the average of the Lexington housing agency and non-MTW national percent changes (for all households).

The percentage (%) estimates are based on all LMHA voucher holders but the number (#) of households have been prorated in order to illustrate a representative subsample of those likely to be in the study.

Interpreting the Potential Impacts

Potential Impact 1: Overall, larger families would be more likely to be affected by the new rent policy, at least in terms of the likeliness of paying a higher family share of shelter costs.

For example:

- The first column shows that households with three or more children represent 18.2 percent of all households in LMHA (or 182 households out of 1000, as indicated in the second column).
- Of all voucher holders who are likely to pay a higher family share (304 households), households with three or more children represent a larger proportion (37.1 percent, as shown in the third column, or 304 households, as shown in the fourth column).

Potential Impact 2: More than half of the households that are likely to have an increase in family share are households that have no earned income.

- About 668 households (or 66.8 percent out of a sample of 1000 households) have no earned income.
- Of the 819 households that are likely to have an increase in family share, 503, or 61.4 percent, of those, are households without earned income.

However, it is important to remember shelter costs represent only part of the picture of households' economic circumstances, and that overall *net income* might improve even for larger families if they increase their earnings over the course of the prior three years.

Table 3
Representativeness of Households with Selected Characteristics Among All Household Types Likely to Pay a Higher Family Share (FS) in Year 4 Under Alternative vs. Current Rent Policies (Assuming No Employment Impact)

Characteristic	(%) Percent of Households	(#) Number of Households	(%) Percent with Higher Family Share under New Policy	(#) Number with Higher Family Share under New Policy
Number of Children				
No Children	45.5	455	19.4	159
Any number of Children	54.5	545	80.6	660
1 Child	19.3	193	17.9	147
2 Children	17.0	170	25.6	210
3 or more Children	18.2	182	37.1	304
Has a child under age 5	19.1	191	30.1	246
No earned income	66.8	668	61.4	503
No income	6.5	65	8.0	65
Sample Size	1000	1000	819	819

4) **Impact on Family Share for all households, by Dollar Amount**
Models developed by MDRC estimate the changes in monthly family share over 4 years, with and without a modest employment impact. Shown below are these estimates for LMHA.

Understanding the Table's Format

Table 4 presents the results of the impact on Family Share for LMHA. The table shows:

- The difference in family share under the new policy compared with current policy using three main categories (Lower under new policy, No change, Higher under new policy)
- The estimated percent (%) of all households impacted under each main category and the estimated percent of all households impacted based on the dollar amount of the impact.
- Estimated number (#) of households impacted for each of the three main categories

The data in the table includes the following information:

- "Year 1" represents when the new rent policy would begin with an initial income assessment
- "Year 4" represents the year after the next triennial recertification.
- For Year 4 and the cumulative years 1-4, two estimates are included:
  - One that assumes that the rent policy has no impact on tenant earnings, and
  - A second that assumes that the policy has a modest impact on tenant earnings.

These estimates are based on all LMHA voucher holders but the numbers of households have been prorated in order to illustrate a representative subsample of those likely to be in the study.

Estimates for family share in Year 4 (with and without a modest employment impact) reflect information on all households for LMHA because data on whether a household is working-age or non-disabled were not available. Family share estimates for Year 1, Year 2, and Year 3 were calculated by taking the average of the Lexington housing agency and non-MTW national percent change (for households).

Interpreting the Potential Impacts

Potential Impact 1: Although the alternative rent policy will *reduce* the family share for some households, it will *increase* it for others. During the three-year period when the new policy's delayed recertification period is in effect, up to 66.3 percent of households (*depending on the year*) may have a *lower* family share than they would otherwise have under current rules, while up to 36.8 percent (depending on the year) may have a *higher* family share.

Potential Impact 2: In Year 4, given no employment impact and without considering any *hardship-related reductions* in TTP (which were difficult to build into the statistical models), it appears that about 75.7 percent of the 819 households likely to pay a higher family share under the new rules, would only pay *up to* $50 per month more. Only a fraction of a percent (0.1%) would pay more than $200 more per month than they would pay under current rules. The higher family share under the new policy would come from the policy's minimum rent, the absence of deductions, and limits on interim recertifications in the face of income declines. *However, as noted, this analysis does not apply any hardship remedies, so the increases in TTP are likely to be overstated to some extent.*

Potential Impact 3: If the new policy has a modest positive effect on earnings, more tenants than under current rules will experience an increase in their family share for Year 4, after their three-year income recertification. If the new policy has a modest employment impact, the analysis suggests that family share may increase by $50 or less per month for about 47 percent of households; by $51 -$100 per month for about 46 percent of households; and by more than $200 per month for less than 1 percent (0.3 percent) of households.

Table 4
Change in Monthly Family Share (FS) Under Alternative vs. Current Rent Policies for All Household Types

Difference in FS under new vs. Current policy	Year 1	Year 2	Year 3	(no employment impact) Year 4	(modest employment impact) Year 4
Lower under new policy (#)	603	663	653	168	24
Lower under new policy (%)	60.3	66.3	65.3	16.8	2.4
$50 or less	45.0	35.1	28.9	16.6	2.4
$50.01 - $100.00	15.3	18.3	19.3	0.1	0.0
$100.01 - $200.00	0.0	6.9	8.2	0.0	0.0
More than $200	0.0	6.0	8.9	0.0	0.0
No Change (#)	30	20	15	13	10
No Change (%)	3.0	2.0	1.5	1.3	1.0
Higher under new policy (#)	368	318	331	819	966
Higher under new policy (%)	36.8	31.8	33.1	81.9	96.6
$50 or less	32.2	25.6	23.1	75.7	47.4
$50.01 - $100.00	3.2	4.4	5.8	5.2	45.6
$100.01 - $200.00	1.2	1.5	2.9	1.0	3.3
More than $200	0.2	0.3	1.4	0.1	0.3
Sample Size	1000	1000	1000	1000	1000

5) **Impact on Net income**

The MDRC team completed a net income analysis for two different types of households which vary importantly in terms of their potential need for child care subsidies:

- *Table 5a and Table 5b are examples of **"Shana's" household***, where Shana is a single parent with two teenage children and no child care expenses.
- *Table 6a and Table 6b are examples of **"Maria's" household***, where Maria is a single parent with an infant who may need child care to work.

Background on Assumptions

For each household, the analysis estimated net monthly income under current rent rules and net income under new rent rules, making different assumptions about how much the parent worked (zero, 15, or 35 hours per week) and her hourly wage ($8 or, in some cases, $16).

Tables 5a and 6a illustrate net income for Shana and Maria under the new and current rent policies when ***there is a change in employment status.***

Tables 5b and 6b illustrate net income for Shana and Maria under the new and current rent polices when ***their employment status remains unchanged.***

Interpreting the Potential Impacts

Potential Impact 1: The analysis of the net income effects illustrates that when a household *changes its work status and earnings* – e.g., when tenants who are not working go to work, or those who are working part-time get full-time jobs, or when working tenants attain wage increases – net household income will improve more under the new rent policy than under current rent rules. This is achieved primarily by holding TTP constant in the face of earnings gains during the three-year period before the next triennial recertification.

Table 5a helps to illustrate how the new policy benefits tenants who do change their work status. The table shows how "Shana's" net monthly income would change under current rent rules as her work status changes. For example, if her initial status was not working, then her net income would be $633 under current rules, given there is not a minimum TTP. Under the new rent rules it would drop to $615 because she would be paying a higher minimum rent (unless she qualified for a hardship exemption). If she were then to go to work full-time (35 hours per week) at a low wage rate ($8 per hour, which is just above the Federal minimum wage), her net monthly income would increase to $1,497 under current rent rules, but by $267 *more* per month (or 18% more) under the new rent rules to $1,764. Thus, Shana would benefit substantially from the new policy if she were initially not working and took a full-time job, even at a low wage. It would increase her net income by 187% under the new policy, compared with 136% under current rules. On an annual basis, this increase would mean a gain in income of $3,204 under the new policy.

The advantage under the new rules is created by holding her TTP constant. Shana's TTP would rise under current rules as she progressed to full-time work, whereas it would remain the same under the new rules. In effect, the implicit marginal "tax" on any increased earnings due to the normal income-based housing subsidy rules would drop to zero percent under the new rules during this period.

The columns on the right side of the Table 5a provide further details on what would happen after the triennial recertification. At that time under the new rent policy, Shana's TTP would be reset to a higher rate, and, as a result, her monthly net income would drop relative to what it had been in the prior period. It would become comparable to what it would be under current rent rules. However, because her TTP would be held constant for another three years, her net income would grow *more* under the new rent rules relative to current rules if she could increase her wage rate. For example, if she could double her wage rate to $16 per hour job, her net income would grow by 37 percent under the new rent rules compared with only 13 percent under existing rules. Put differently, the same wage increase would boost her net monthly income by $364 (or 21%) more per month (or $4,368 per year) under the new rules than it would under current rules. The improvement would be less under existing rules because her TTP would increase per month.

Potential Impact 2: The advantages of the new rules will be smaller for tenants who, in order to go to work or to work more, need external child care subsidies but cannot get them. The absence of child care allowances under the new rules will offsets some of the benefit of holding TTP constant in the face of earnings gains for some families unless other child care arrangements can be found. Of course, many families who need but cannot get external child care subsidies have difficulty working even under current rent rules because the existing child care allowances are

only an income deduction and do not fully cover child care costs. Thus, some families may not work under either rent policy because, if they have to pay for child care out of pocket, it may not "pay" to work.

Table 6a provides estimates of how net income would change for "Maria" as she changes her work status under the new and existing rent rules. However, in Maria's case, it is important to take into consideration her likelihood of receiving child care subsidies from an external funding source. The analysis show that if Maria, who has a young child, does not need to pay for child care (e.g., because she is able to arrange for family or friends to care for her child at no cost), the new rent rules would provide a clear advantage for going to work full-time, as they do for Shana.

The new rules would also make it more advantageous, compared with current rules, for Maria to move from not working to working full-time, even if she needed to pay for child care out of her own pocket without any subsidies. However, this advantage would be less than it would be if Maria had no child care costs.

After the triennial recertification, parents without a child care subsidy who are working (and paying for child care out of pocket) may fair less well under the new rent rules compared with the existing rent rules once their TTPs are adjusted to reflect their increased earnings. For example, as Table 6a shows, Maria would have a lower net monthly income under the new rules after the triennial recertification *if she needed but receives no external child care subsidy*. However, under these circumstances, Maria might very well choose not to work, *even under the current rent rules*, if she had to pay for most of her child care out of pocket.

At the same time, after that next recertification, Maria would benefit more under the new rent rules if she increased her earnings during the new three-year period (because of the new cap on her TTP). The advantage over current rules would be even larger once her child required less paid child care after entering preschool or elementary school.

Potential Impact 3: Tenants who do not work at all may pay a somewhat higher TTP and have somewhat lower net income under the new rules if they become subject to the minimum rent and do not qualify for a hardship remedy. In addition, working tenants who do not increase their hours of work or wage levels (e.g., they remain working part-time or full-time at a constant wage) will experience little, if any, gain – or loss – in net income under the new rules relative to current rules. This is because their TTPs will remain constant over time, even under current rules. Tables 5b and 6b illustrate this pattern by comparing net income for Shana and Maria under the new and current rent policies when their employment status *remains unchanged*. These tables indicate that, at least in these hypothetical examples, the largest reduction in net income when work status does not change is about $18 per month.

Exhibits illustrating the impact on "Shana's" household

Table 5a

Changes in Estimated Household Monthly Net Income As "Shana" Increases Her Work Effort, Under Alternative and Current Rent Policies

Shana is a single mother with 2 children (Ages 13 and 15)	Year 1 through Year 3				3-Year Recertification Interview: New TTP Set	Year 4 through Year 6			
	Not Working	Working FT at $8/hour	Difference	Percent Change		Working FT at $8/hour	Working FT at $16/hour	Difference	Percent Change
	Initial Status					***Initial Status***			
Net Income									
New Rules	$615	$1,764	+$1,149	+187%		$1,497	$2,058	+$561	+37%
Current rules	$633	$1,497	+$864	+136%		$1,497	$1,694	+$197	+13%
Difference (New minus Current) (%)	(3%)	+18%				0%	+21%		

Table 5b

Estimated Household Monthly Net Income for "Shana," Assuming No Change in Work Status, Under Alternative and Current Rent Policies, by Work Status

Shana is a single mother with 2 children (Ages 13 and 15)	Not Working	Working PT at $8/hour	Working FT at $8/hour
New Rules	$615	$949	$1,497
Current Rules	$633	$961	$1,497
Difference			
New minus Current	($18)	($12)	$0

Exhibits illustrating the impact on "Maria's" household

Table 6a

Changes in Estimated Household Monthly Net Income As "Maria" Increases Her Work Effort, Under Alternative and Current Rent Policies, by Receipt of External Child Care Subsidy

Maria is a single mother with a 1-year old child	Year 1 through Year 3				3-Year Recertification Interview: New TTP Set	Year 4 through Year 6			
	Not Working	Working FT at $8/hour	Difference	Percent Change		Working FT at $8/hour	Working FT at $16/hour	Difference	Percent Change
	Initial Status					***Initial Status***			
Does not need child care subsidy									
New Rules	$506	$1,476	+$970	+192%		$1,199	$1,819	+$620	+52%
Current rules	$514	$1,188	+$674	+131%		$1,188	$1,455	+$267	+22%
Difference (New minus Current) (%)	(1%)	+24%				+1%	+25%		
Needs child care subsidy but does not receive it									
New Rules	$506	$1,057	+$551	+109%		$780	$1,428	+$648	+83%
Current rules	$514	$910	+$396	+77%		$910	$1,194	+$284	+31%
Difference (New minus Current) (%)	(1%)	+16%				(14%)	+20%		

Table 6b

Estimated Household Monthly Net Income for "Maria," Assuming No Change in Work Status, Under Alternative and Current Rent Policies, by Work Status

Maria is a single mother with a 1-year old child but does not currently have child care costs and does not use a child care deduction	Not Working	Working PT at $8/hour	Working FT at $8/hour
New Rules	$506	$838	$1,200
Current Rules	$514	$839	$1,188
Difference			
New minus Current	($8)	($1)	$12

D. Measuring the Impacts

Information on tracking and documenting the implementation of the HCV rent reform activity is found in **Section II - Activity Metrics** and **Section VI - Annual Reevaluation of Rent Reform Activity**.

Additionally, at the conclusion of the study MDRC will report the outcomes of the Study in a comprehensive report.

V. Hardship Policy

LMHA is participating in the Study in order to further the national discussion regarding the future of the Housing Choice Voucher Program. The alternative rent strategies are not intended to create an undue burden on the Alternative Rent Group members. LMHA has established the following Hardship Policy for Alternative Rent Group members. Households participating in the Study as part of the Control Group will be subject to the current LMHA policies.

A. Hardship Waiver Request Process

The process for requesting a waiver will be as follows:

1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to a Housing Specialist.

2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.

3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 180 days.

4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 7-day eviction notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 7-day eviction notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

B. Hardship Waiver Criteria

LMHA may determine a financial hardship exists when the household cannot pay the minimum rent or has an excessive rent burden. Households will be considered for a hardship waiver, as discussed below, if:

1) The hardship cannot be remedied by the one interim recertification permitted each year (which cannot reduce a household's TTP below the minimum level).

2) The household is at an income level or experiences a loss of income and/or a TTP increase such that its total monthly TTP exceeds 40 percent of its current monthly gross income up to the Payment Standard. The gross income will include imputed income in the same manner as current calculations.

3) The household faces risk of eviction for non-payment of rent – including utility shut-offs for non-payment of utility bills that could lead to eviction.

4) Other circumstances as determined by the housing authority.

C. Hardship Review Process

1) The administrative review of the household circumstances will be conducted by LMHA according to current review processes.

2) For hardship claims related to imminent risk of eviction, LMHA will conduct an expedited hearing process.

3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing authority's normal grievance procedures.

4) LMHA will complete all information regarding the request for Hardship Waiver and the outcome in the system of record for tracking Hardship Waiver requests.

D. Hardship Remedies

1) The Hardship remedies may include any of the following:
   a) Allowing an additional interim recertification beyond the normal one-per-year option. This could lower household's TTP (but only as low at the $50 minimum TTP) until the next triennial recertification.

   b) Setting the household's TTP at the minimum level for up to 180 days.

   c) Setting the household's TTP below the minimum, at 28 percent of current income, for up to 180 days.

   d) Waiving the minimum rent entirely for 180 days.

e) A specific time frame for the temporary TTP or minimum rent may be established for longer than 180 days based on specific circumstances. However, the time frame will never go pass the triennial recertification date.

f) Any combination of the above remedies.

2) During the 180-day period when the TTP is reduced, the housing authority will increase its payment to the landlord to cover the portion of the rent previously paid by the tenant directly to the landlord, and it will notify the landlord of the change and the time period of the increased payments.

3) In addition to the remedy or remedies offered, the household may be referred to federal, state or local assistance programs to apply for assistance, or to obtain verification that they are ineligible to receive benefits.

4) The Hardship remedies are subject to the following limitations:
   a) The tenant portion of the rent payments will not be suspended prior to a hardship designation.

   b) Remedies will not affect any rent attributable to a gross rent that exceeds the applicable payment standard.

   c) Opting out of the alternative rent policy is not a remedy option.

E. End of Hardship Waiver Period

1) If the hardship continues, the household may submit a request for an extension of the hardship remedy. However, the time frame will never go past the triennial recertification date.

2) At the end of the hardship waiver period, the household's regular TTP will be reinstated.

VI. Annual Reevaluation of Rent Reform Activity

LMHA will review the rent reform activities annually and will report its findings to HUD in the yearly MTW Report. Because certain activities will be conducted on a triennial basis, not all information may be presented each year. However, LMHA will report on the following:

- Hardship requests and determinations
- Interim certifications for loss of income
- Program departures
- HAP Expenditure

VII. Transition Period

A. Selection of Participants

Study Participants will be randomly selected from the eligible vouchers through a computer generated random selection program. Eligible vouchers will specifically exclude the following:

1) Vouchers not currently administered under the Moving to Work Program:
   a) Veterans Assisted Special Housing
   b) Moderate Rehabilitation

c) Shelter Plus Care

2) Enhanced Vouchers
3) HUD Project Based Vouchers
4) Vouchers administered under portability
5) Elderly households: Head of Household, co-head, spouse or single member households 59 years or older pursuant to the Administrative Plan
6) Households headed by people older than 56 years of age (who will become seniors during the course of the long-term study).
7) Disabled households: Head of Household, co-head, spouse or single member households with disability as defined in the Administrative Plan
8) Households currently participating in the Family Self Sufficiency Program
9) Households participating in the Homeownership Program
10) Households currently using a childcare expense deduction to determine adjusted annual income.
11) Households that contain a mix of members with immigration or citizenship status eligible and non-eligible status for housing subsidy would not be included in the Study
12) Households that receive case management or other supportive services through one of LMHA's MTW Special Referral programs service-providers.

B. Enrollment of Participants

1) Thirty Day Review Period

   Households selected for the Alternative Rent Group will receive an opportunity to meet with a LMHA Housing Specialist to review the Study and their specific calculation of Total Tenant Payments under both the traditional and Study policies. They will have a period of thirty days to consider whether to select to be excluded from the Study.

2) Prior to Certification Meeting

   Selected Alternative Rent Group members will receive special information with their recertification package to introduce them to the rent reform policies and to answer household questions. LMHA will conduct the triennial certification at the time otherwise scheduled for the household annual certification.

3) During Certification Meeting

   At the initial triennial certification, the household will have the changes in rent reform policies explained to them. They will be provided with a gift card as a nominal thank you for providing filling out a base information form.

   Changes in the household share, TTP, utility allowance schedule will be provided to the household with no less than 30 days' notice.

4) Mitigation of impact at initial triennial certification

   A "grace period" of six months will be provided to mitigate the impact of the transition for Alternative Rent Group members who, at the triennial certification at the beginning of the three-year period (and at subsequent triennials), have a current/anticipated 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 six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.

IV. Approved MTW Activities: HUD Approval Previously Granted

This section of the annual plan describes approved MTW activities. It includes a brief description, anticipated changes (if any) and new metrics and baselines for each activity. Activities are organized according by status: implemented, not yet implemented, on hold or closed out.

A. Implemented MTW Activities

For each previously approved and implemented activity, LMHA has provided: 1) the Plan Year in which the activity was first approved and implemented; 2) a description of the activity and an update on its status; 3) an indication of whether or not the Housing Authority anticipates any non-significant changes or modifications to the activity during the Plan Year; and 4) an indication of whether or not the Housing Authority anticipates changes or modifications to the metrics, baselines or benchmarks during the Plan year.

Occupancy at Elderly/Disabled High Rise Developments

LMHA had experienced decreasing occupancy rates at several of its elderly/disabled-only sites for many years. Through a combination of MTW initiatives, LMHA is reaching its goal of 97% occupancy at these sites. Higher occupancy rates at these sites improve LMHA's operating revenues and achieve greater cost effectiveness, and increase housing choices for 0- and 1-bedroom qualified applicants age 55 to 61.

- **Locally Defined Definition of Elderly (Activity #10-2008)**

The activity, proposed and implemented in FY 2008, is to pilot the following local definition of elderly: any family whose Head of Household, Cohead, or Spouse is age 55 or above. LMHA had been experiencing decreased occupancy rates at its elderly/disabled-only high-rises prior to adopting a local definition of elderly for these communities. The MTW age criterion is used to determine eligibility for residency at Dosker Manor, Avenue Plaza, Will E. Seay Plaza (formerly Bishop Lane Plaza), and Saint Catherine Court. Opening up these sites to non-disabled households between ages 55 and 61 has raised occupancy rates and increased the pool of 1 bedroom and efficiency units available to these applicants. LMHA does not anticipate any non-significant changes or modifications to the activity will be made in FY 2015, though the following HUD Standard Metric will be reported in the FY 2014 MTW Annual Report are following:

Housing Choice #4: Displacement Prevention				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box: Families whose HoH, Cohead or Spouse is age 55+ that would like to live at the sites covered by the activity. The sites	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after Implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Annual *number* of households at each site losing assistance/moving	Expected *number* of households at each site losing assistance/moving	Actual *number* of households at each site losing assistance/moving	Explanation to be provided

are: Dosker Manor Avenue Plaza Will E. Seay Plaza Saint Catherine Court	prior to implementation..	7/1/14 thru 6/30/15.	7/1/14 thru 6/30/15.	
Data Source(s): Emphasys LIB; PHA financial records				

Housing Choice #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a *better unit and/or neighborhood of opportunity as a result of the activity (increase). *Better unit is defined as a unit at one of the sites covered by the activity. The sites are: Dosker Manor Avenue Plaza Will E. Seay Plaza Saint Catherine Court	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Annual *number* of households able to move to a better unit and/or neighborhood of opportunity prior to implementation.	Expected *number* of households able to move to a better unit and/or neighborhood of opportunity 7/1/14 thru 6/30/15.	Actual *number* of households able to move to a better unit and/or neighborhood of opportunity 7/1/14 thru 6/30/15.	Explanation to be provided
Data Source(s): Emphasys LIB; PHA financial records				

- **Lease-Up Incentives for New Residents at Dosker Manor (Activity #23-2010)**

LMHA proposed and implemented the activity in FY 2010. The activity is to give lease-up incentives to new residents at Dosker Manor, one of the Agency's elderly/disabled high-rises located in downtown Louisville. Because Dosker Manor's occupancy rate has remained below 90% for some time now, new residents receive a waiver of the initial deposit and the first month's rent free. The incentives should increase occupancy rates and defray fixed operating expenses at the site. LMHA does not anticipate any non-significant changes or modifications to the activity will be made in FY 2015, however, the following HUD Standard Metric will be reported in the FY 2014 MTW Annual Report are following:

Cost Effectiveness #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Sum of gross (net) annual rental revenue from new households at Dosker Manor prior to implementation	Expected *sum* of gross (net) annual rental revenue from new Dosker Manor households that received the lease-up incentive between 7/1/14 thru 6/30/15	Actual *sum* of gross (net) rental revenue from new Dosker Manor households that received the lease-up incentive between 7/1/14 thru 6/30/15	Explanation to be provided
Data Source(s): Emphasys; PHA financial records				

MTW Rent Policies (Non Rent Reform Demonstration)

The MTW Demonstration also allows LMHA to rethink other policies – like the rent policy for Public Housing and the Housing Choice Voucher programs – to encourage families to work towards housing self-sufficiency. Alternate rent structures also ease the burden on residents and the Agency. As part of LMHA's rent reform goals, the Authority will continue to use HUD's Enterprise Income Verification (EIV) System in its day-to-day operations.

- **Elimination of the Mandatory Earned Income Disregard (Activity #32-2012)**

Proposed and implemented in the FY 2012 Plan, LMHA eliminated the HUD Mandatory Earned Income Disregard from the calculation of total tenant payments of families who are in the Public Housing and Housing Choice Voucher programs. This activity increases rent revenues and simplifies the rent payment calculation. LMHA does not anticipate any non-significant changes or modifications to the activity will be made in FY 2015. The HUD Standard Metrics that will be reported in the FY 2014 MTW Annual Report are following:

Cost Effectivenes #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
	Number of households receiving EID *multiplied by* the average cost per household to	Anticipated number of households that will receive EID *multiplied by* the average	Actual number of households receiving EID *multiplied by* the actual average cost per household	Explanation to be provided

	track/calculate annually prior to implementation	anticipated cost per household to track/calculate annually as of 6/30/15	to calculate/track annually as of 6/30/15	
Data Source(s): Emphasys; Staff logs; PHA financial records				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
	Number of households receiving EID *multiplied by* the average staff time required per household to track/calculate EID annually prior to implementation	Expected number of households receiving EID *multiplied by* the average staff time required per household to track/calculate EID annually as of 6/30/15	Actual households receiving EID *multiplied by* the average staff time required per household to track/calculate EID annually as of 6/30/15	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Cost Effectiveness #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease). The task is tracking/calculating a household's TTP according to the Mandatory EID rules.	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Average error rate, as a *percentage*, of tracking/calculating household TTP	Expected error rate, as a *percentage*, of tracking/calculating household TTP	Actual error rate, as a *percentage*, of tracking/calculating household TTP as	Explanation to be provided.

	according to EID rules prior to implementation.	according to EID rules as of 6/30/15	of 6/30/15	
Data Source(s): Staff logs; Emphasys				

Cost Effectiveness #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Sum of gross (net) annual rent revenue from households receiving EID prior to implementation	Expected *sum* of gross (net) annual rental revenue from households no longer receiving EID as of 6/30/15	Actual *sum* of gross (net) annual rental revenue from households no longer receiving EID as of 6/30/15	Explanation to be provided.
Data Source(s): Emphasys; PHA financial records				

- **Standard Medical Deduction (Activity #8-2008)**

Proposed and implemented in the FY 2009 Plan, disabled and elderly families are eligible to receive a $1,600 standard medical deduction. The deduction is not mandatory; if the families' health care costs exceed the $1,600 exemption, the families may opt to have their expenses itemized. The cost reductions from this activity are administrative savings due to reduction in verifications and paperwork. The initiative covers families in both Public Housing and the HCV program. Taken together, Public Housing and HCV programs reduced the cost to process applicants and conduct rent calculations by $34,633 in FY 2010 and $33,424 in FY 2011. The activity has achieved greater cost effectiveness in federal expenditures. LMHA does not anticipate any non-significant changes or modifications to the activity will be made in FY 2015. The HUD Standard Metrics that will be reported in the FY 2014 MTW Annual Report are following:

Type of Activity:				
CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
	Number of households receiving the itemized medical deduction *multiplied by* the average cost per household to calculate/verify medical expenses annually prior to implementation	Anticipated number of households receiving the standard medical deduction *multiplied by* the average cost savings per household to use the standard deduction during FY 2015	Actual number of households receiving the standard medical deduction *multiplied by* the average cost savings per household to use the standard deduction during FY 2015	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
	Number of households receiving the itemized medical deduction *multiplied by* the average staff time required per household to calculate/verify medical expenses annually before implementation	Anticipated number of households receiving the standard medical deduction *multiplied by* the average staff time savings per use the standard medical deduction during FY 2015	Actual number of households receiving the standard medical deduction *multiplied by* the average staff time savings per use the standard medical deduction during FY 2015	Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Cost Effectiveness #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Average error rate, as a *percentage*, of calculating a household's medical deduction prior to implementation	Expected error rate, as a *percentage*, of calculating a household's medical deduction as of 6/30/15	Actual error rate, as a *percentage*, of calculating a household's medical deduction as of 6/30/15	Explanation to be provided.
Data Source(s): Emphasys; Staff logs				

Cost Effectiveness #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Sum of gross (net) annual rent revenue from households receiving medical deductions prior to implementation	Expected *sum* of gross (net) annual rental revenue from households receiving standard medical deductions as of 6/30/15	Actual *sum* of gross (net) annual rental revenue from households receiving standard medical deductions as of 6/30/15	Explanation to be provided.
Data Source(s): Emphasys; PHA financial records				

- **Alternate Year Reexaminations (Activity #4-2007)**

LMHA proposed and implemented an alternate year schedule for reexaminations with the FY 2008 Plan. For Public Housing, each year 50% of the elderly and disabled families age 55+ residing in Public Housing receive a full reexamination of eligibility on the anniversary of their lease-up date. For the HCV program, elderly and disabled families age 55+ in the Housing Choice Voucher program are required to

appear for a full reexamination every other odd numbered calendar year (referred to as an “ON” year). In an even numbered year (referred to as an “OFF” year) HCV families are required to complete a mini-recertification packet and mail it to the Agency.

The alternate examination schedule of the Housing Choice Voucher program achieved no cost savings in 2009 and 2011 because all clients were scheduled for a full reexamination. However, in FY 2010 the activity helped LMHA obtain nearly $28,000 of savings across both programs due to a substantial reduction in staff time spent conducting income verifications and client interviews.

In FY 2012, LMHA amended this activity to include all disabled families in the Public Housing program whose head of household or spouse is disabled.

In FY 2014, LMHA is requesting approval to create a "local version" of HUD-Form 9886 that would be signed by the tenant at the biennial recertification. The form’s content has been altered only to extend the expiration period from 15 months to 24 months and to remove any reference that would otherwise indicate it is a federal form. The new form is in the appendix of this Annual MTW Plan.

No changes are anticipated in FY 2015; however, the HUD Standard Metrics that will be reported in the FY 2014 MTW Annual Report are following:

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd
	Number of recertifications of elderly and/or disabled families at all Public Housing sites *multiplied by* the average cost to conduct a recertification prior to implementation	Expected number of recertifications of elderly and/or disabled families at all Public Housing sites during FY 2015 *multiplied by* the average cost per recertification	Actual number of recertifications of elderly and/or disabled families at all Public Housing sites during FY 2015 *multiplied by* the average cost per recertification	Explanation to be provided
	HCV Program: tbd	HCV Program: Tbd	HCV Program: Tbd	HCV Program: tbd
	Number of recertifications of elderly and disabled (age 55/+) families in	Expected number of recertifications of elderly and disabled (age 55/+) families in	Actual number of recertifications of elderly and disabled (age 55/+) families in	Explanation to be provided

	the HCV program *multiplied by* the average cost to conduct a voucher recertification prior to implementation	the HCV program during FY 2015 *multiplied by* the average cost per voucher recertification	the HCV program during FY 2015 *multiplied by* the average cost per voucher recertification	
	Agency-Wide: tbd	Agency-Wide: tbd	Agency-Wide: tbd	Agency-Wide: tbd
	Number of Public Housing and HCV recertifications *multiplied by* the average cost of a recertification, during the fiscal year before implementation	Expected number of Public Housing and HCV recertifications during FY 2015 *multiplied by* the average cost per recertification	Actual number of Public Housing and HCV recertifications during FY 2015 *multiplied by* the average cost of a recertification	Explanation to be provided
Data Source(s): Emphasys; PIC; Staff logs.				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd
	Number of recertifications of elderly and/or disabled families at all Public Housing sites *multiplied by* the average staff time required per recertification before activity implementation	Expected number of recertifications of elderly and/or disabled families at all Public Housing sites during FY 2015 *multiplied by* the average staff time required per recertification	Actual number of recertifications of elderly and/or disabled families at all Public Housing sites during FY 2015 *multiplied by* the average staff time required per recertification	Explanation to be provided
	HCV Program: tbd	HCV Program: Tbd	HCV Program: Tbd	HCV Program: tbd
	Number of recertifications	Expected number of recertifications	Actual number of recertifications of	Explanation to be provided

	of disabled (age 55/+) and elderly families in the HCV program *multiplied by* the average staff time required per recertification before activity implementation	of disabled (age 55/+) and elderly families in the HCV program during FY 2015 *multiplied by* the average staff time required per voucher recertification	disabled (age 55/+) and elderly families in the HCV program during FY 2015 *multiplied by* the average staff time required per voucher recertification	
	Agency-Wide: tbd	Agency-Wide: tbd	Agency-Wide: tbd	Agency-Wide: tbd
	Total amount of time required to conduct recertifications prior to implementation	Expected total amount of time required to conduct recertifications in FY 2015	Actual total amount of time required to conduct recertifications in FY 2015	Explanation to be provided
Data Source(s): Emphasys; PIC; Staff logs; PHA financial records				

Cost Effectiveness #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd	Public Housing: tbd
	Sum of gross (net) annual rent revenue from elderly and/or disabled households at all sites prior to implementation	Expected *sum* of gross (net) annual rent revenue from elderly and/or disabled households at all sites as of 6/30/15	Actual *sum* of gross (net)) annual rent revenue from elderly and/or disabled households at all sites as of 6/30/15	Explanation to be provided.
Data Source(s): Emphasys; PHA financial records				

- **Earned Income Disregard for Elderly HCV Families (Activity #6-2008)**

This activity was proposed in the LMHA 2009 Plan and implemented that year. The activity is to give a $7,500 earned income disregard to elderly families in the Housing Choice Voucher Program who's only other source of income is their Social Security entitlement. While the disregard currently only affects a small number of families, elderly families who go to work in the future will be able to retain all of the

income that falls below the threshold. No changes are expected to be made in FY 2015. The HUD Standard Metrics that will be reported in the FY 2014 MTW Annual Report are following:

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
	Average gross annual income from the number of elderly HCV households before implementation	Expected average gross income from the number of elderly HCV households as of 6/30/15	Actual average gross income from the number of elderly HCV households as of 6/30/15	Explanation to be provided
Data Source(s): Emphasys; PIC				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

(6) Other	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Explanation to be provided.
Data Source(s): Emphasys				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric,	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of	Whether the outcome meets or exceeds the benchmark.

the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	the activity (number). This number may be zero.	implementation of the activity (number).	the activity (number).	
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided

Data Source(s): Emphasys; Staff logs; PHA financial records

Cost Effectiveness #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided.
Data Source(s): Staff logs				

Cost Effectiveness #5: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided.
Data Source(s): Emphasys; PHA financial records				

Occupancy Criteria and Rent Changes for New Scattered Sites

Many of LMHA's Scattered Sites are highly desirable properties, especially the newly acquired or constructed off-site HOPE VI Clarksdale Replacement Scattered Site units. The amenities and existing low rent structure may in some instances discourage residents from moving out of the unit towards self-sufficiency. LMHA is piloting term limits, work requirements and mandatory case management for residents at these sites and evaluating the potential of the initiatives to incite residents to move up and out of the Public Housing program.

- **Term Limits (Activity #9-2007)**

This activity was proposed in the Agency's 2007 Annual Plan and implemented during 2007. The activity is a five-year limitation on residency at the New Scattered Site detached single-family homes. Term

limits apply to public housing units created off-site under the Clarksdale HOPE VI Revitalization program and scattered site single-family homes acquired or developed since LMHA fulfilled its Clarksdale one-for-one replacement commitment. No changes to this activity are expected to be made in FY 2015; however, the housing authority will report on the HUD Standard Metrics below in the FY 2014 MTW Annual Report.

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PIC				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

(6) Other	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Explanation to be provided.
Data Source(s): Emphasys				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

				Explanation to be provided
Data Source(s): Various; Emphasys				

Self-Sufficiency #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PIC; PHA financial records				

Self-Sufficiency #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided

Data Source(s): Emphasys; PHA financial records

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Housing Choice #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

- **Employment/Educational Requirements (Activity #9-2007)**

This activity was also proposed in the Agency's 2007 Annual Plan and implemented during 2007.In addition, heads of household must be employed and working at least 20 hours per week towards being economically self-sufficient, in order to be eligible for these units. Due to the downturn in the national economy, the work requirement was reduced from 30 hours to 20 hours. This change was made in FY 2010.

In 2014, LMHA requested and HUD granted the authority to define "economic self-sufficiency" as the ability to obtain and maintain suitable employment. "Employment" means the household must be receiving earned income. "Suitable" is defined as annual earned income equal to or exceeding minimum wage times 2,000 hours, which is equal to $14,500 (as of July 23, 2013, minimum wage is $7.25 x 2,000 = $14,500). This is the minimum income requirement for a family to participate in the Housing Choice Voucher Homeownership program. And "maintaining" employment is defined as being continuously employed for at least 1 year. If the Head of household has completed educational milestones within the last 3 months, he/she can meet "maintaining" employment as follows: certification program – 9 months employment in the certified field; associate's degree – 6 months employment in a related field, and; bachelor's degree – 3 months employment in a related field.

No substantial changes to this activity are expected to occur in FY 2015; however, the HUD Standard Metrics following will be reported in the FY 2014 MTW Annual Report:

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PIC				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various; Emphasys				

Self-Sufficiency #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PHA financial records				

Self-Sufficiency #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s):Emphasys; PHA financial records				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

- **Mandatory Case Management (Activity #21-2010)**

LMHA proposed and implemented the activity in FY 2010. LMHA has revised the occupancy criteria for these units to include mandatory participation in a case management program [Case Management, Family Self-Sufficiency (FSS), or Individual Development Account (IDA)] and movement toward self-sufficiency.

Residents moving from another public housing unit to one of these units may choose between General Case Management requiring quarterly contact or the Family Self-Sufficiency (FSS) program requiring monthly contact. Both case management options assist residents with movement toward self-sufficiency and include working to identify and eliminate barriers to sustained employment along with referrals to

services related to education, employment, health, financial skills and home ownership. Residents opting for FSS commit to a more structured program with required financial skills classes as well as the potential to benefit from the FSS escrow account or an Individual Development Account (IDA). Residents agreeing to move directly from the LMHA wait list to a term-limited unit are required to enroll in FSS.

Residents in the FSS program can benefit from two asset building options. Rent increases from earned income will be placed in an escrow account, which the resident will receive when completing FSS. Escrow accumulation will be limited for residents with significant earned income at the time of FSS enrollment. For these residents LMHA may offer an IDA (matched savings) account to supplement the escrow account. Disabled residents who feel they cannot commit to FSS may also opt for the IDA account.

Residents who at the end of the five-year period are not ready to move to either market-rate rental housing or home ownership may request an extension. Extensions may be considered based on accident or illness, completion of post-secondary education or documented evidence of efforts to obtain market-rate rental or purchase a home. Under no circumstance will participation be extended more than two additional years. Residents who fail to participate in mandatory case management activities will be submitted to property management staff. Property management will determine whether the next step is returning to a public housing development or eviction.

No changes to this activity are expected to be made in FY 2015. The HUD Standard Metrics below will be reported in the FY 2014 MTW Annual Report:

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
	Average gross annual income from the number of elderly HCV households before implementation	Expected average gross income from the number of elderly HCV households as of 6/30/15	Actual average gross income from the number of elderly HCV households as of 6/30/15	Explanation to be provided
Data Source(s): Emphasys; Tracking-at-a-Glance				

Self-Sufficiency #2: Increase in Household Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Actual average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Tracking-at-a-Glance				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

				Explanation to be provided
Data Source(s): Emphasys; Tracking-at-a-Glance				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Tracking-at-a-Glance				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Tracking-at-a-Glance				

Self-Sufficiency #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Tracking-at-a-Glance				

Self-Sufficiency #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PHA financial records				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Tracking-at-a-Glance				

Public Housing Development

LMHA's goal is to transform the physical stock of the original family developments owned and managed by the Agency in the coming years, replacing the current public housing developments with mixed income communities, while at the same time providing replacement units so that the overall number of families served will not decrease. LMHA has implemented several MTW initiatives designed to expedite the redevelopment process and insure that all new and newly acquired properties are energy-efficient and cost effective.

- **Simplification of the Public Housing Development Submittal (Activity#18-2009)**

LMHA proposed and implemented the activity in FY 2009. The activity is a simplified proposal for each acquired or developed public housing property. Twice yearly, LMHA also submits a six month report summarizing the Agency's acquisition and development activities to the HUD Louisville Field Office. The activity has reduced the amount of time staff spend preparing development submittals and reduced the average length of time to close on a property. No changes to this activity are expected to be made in FY 2015; however, the following HUD Standard Metrics will be reported in the FY 2014 MTW Annual Report:

Cost Effectiveness #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd

				Explanation to be provided
Data Source(s): Staff logs; PHA financial records				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Staff logs; PHA financial records				

Housing Choice #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): PIC; Staff logs				

Expanded Homeownership Opportunities

The Agency continues to focus on expanding homeownership opportunities for low-income families in the Public Housing and Housing Choice Voucher programs. LMHA has implemented three Moving to Work policy changes to its HCV Homeownership Program.

- **Amount and Distribution of HCV Homeownership Assistance (Activity #3-2006)**

This activity was proposed and implemented in the FY 2006 Plan. LMHA revised its HCV Administrative Plan to allow for the utilization of a two-bedroom payment standard for all one bedroom eligible HCV Homeownership households and maintains the 110% FMR local payment standard and the 120% FMR in exception rent areas for the Homeownership program. Following are the HCV Rental payment standards and, effective January 1, 2013, the relative Homeownership payment standards:

		Rental		Homeownership	
Bedroom Size	**Fair Market Rent**	**Payment Standard**	**Exception Payment Standard**	**Payment Standard (110%)**	**Exception Payment Standard (120%)**
0	$503	$520	$570	$553	$604
1	$588	$600	$659	$647	$706
2	$731	$712	$782	$804	$877
3	$1,012	$995	$1,092	$1,113	$1,214
4	$1,144	$1,057	$1,160	$1,258	$1,373
5	$1,316	$1,215	$1,334	$1,448	$1,579
6	$1,487	$1,374	$1,509	$1,636	$1,784
7	$1,658	$1,532	$1,682	$1,824	$1,990
8	$1,830	$1,691	$1,857	$2,013	$2,196

Also, LMHA will utilize the following HUD Standard Metrics to evaluate the outcomes of the activity in the FY 2014 MTW Annual Report:

Cost Effectiveness #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Housing Choice #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs				

Housing Choice #6: Increase in Homeownership Opportunities				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity (number). This number may be zero.	Expected number of households that purchased a home after implementation of the activity (number).	Actual number of households that purchased a home after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs				

- **Exception Payment Standards for HCV Homeownership (Activity #13-2009)**

Proposed in the FY 2009 Plan and implemented that year, this activity adjusts payment standards for HCV Homeownership to 120% of FMR in homeownership Exception Payment areas using Census 2000 Owner Occupied Median Value instead of Renter Occupied Median gross rent to calculate exception payment census tracts. In fiscal year 2010, program homebuyers' average increase in buying power for 2-bedroom homebuyers was $12,489 and in fiscal year 2011, the increase for 2-bedroom homebuyers was $8,321. To date, 14 homeowners have bought in exception payment districts and LMHA homebuyers live in 24 of 26 Metro Council Districts. No changes in this activity are planned for 2015. LMHA will utilize the following HUD Standard Metrics will be reported in the FY 2014 MTW Annual Report:

Cost Effectiveness #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records				

Housing Choice #5: Increase in Resident Mobility				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
Data Source(s): Emphasys				

Housing Choice #6: Increase in Homeownership Opportunities				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households that purchased a home as a result of the activity (increase).	Number of households that purchased a home prior to implementation of the activity	Expected number of households that purchased a home after implementation of the activity	Actual number of households that purchased a home after implementation of the activity	Whether the outcome meets or exceeds the benchmark.

	(number). This number may be zero.	(number).	(number).	
	tbd	tbd	tbd	tbd
Data Source(s): Emphasys; Staff logs				

Local Leased Housing Program

For the many other families for whom homeownership isn't a viable option, LMHA will look at its leased housing program to see what policy and program changes might strengthen communities and make them better places to live. Developing comprehensive initiatives in these areas will continue to require regulatory relief.

- **Special Referral MTW HCV Programs (Restricted Portability until Graduation) (Activity #44-2015)**

MTW allows LMHA to maximize the potential of locally available resources to develop programs for people with specific needs. The goal is to meet needs not met by other agencies and to partner with local organizations that have social services programs that need a housing support element. Some of these needs will be transitional; others are for programs that provide more long-term support, particularly for solo parents with children where the parent is working or preparing for work by participating in educational programs.

Special referral programs are intended to address the needs of persons not otherwise met in the community and provide the voucher as incentive for families to move toward economic self-sufficiency. LMHA has established special referral programs with two housing and support services providers at three facilities. Families with specific needs often face multiple barriers to achieving their self-sufficiency goals. LMHA's special referral MTW Housing Choice Voucher programs are a strong incentive for participants to enroll and complete the program as the current waitlist for HCV vouchers includes over 15,700 applicants. It also increases housing choice for low-income families interested in these programs.

Residents can be referred through the program staff to LMHA directly for voucher assistance provided the resident meets Housing Choice Voucher eligibility requirements. Similarly, existing LMHA public housing residents and Section 8 clients receive preference for these residential self-sufficiency programs. While voucher recipients are initially required to reside on site and meet the program requirements, their voucher resumes full portability after they successfully graduate from the program. As a participant moves from the site, LMHA issues a voucher to the next eligible applicant.

Many of LMHA's partners' residential facilities are newly constructed or renovated. As such, LMHA has used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HQS inspection. This substitution has saved the authority thousands of dollars since Louisville Scholar House first came online in 2008.

LMHA will utilize the HUD Standard Metric shown in the table below to evaluate the outcomes of its Special Referral programs in the FY 2014 MTW Annual Report:

Cost Effectiveness #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Staff logs; PHA financial records				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Staff logs; PHA financial records				

Cost Effectiveness #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Various				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status				
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Various				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Various				

Self-Sufficiency #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	Actual number of households receiving self sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Self-Sufficiency #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 and/or 9 subsidies per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PHA financial records.				

Self-Sufficiency #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; PHA financial records.				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s):Various				

Housing Choice #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

- **The Villager - Center for Women and Families (CWF) (Activity #1-2005)**

Proposed and implemented in the FY 2005 Plan, LMHA allocates up to 22 vouchers to a special referral program with the Center for Women and Families for their long-term transitional housing on their downtown campus. Programs at the Center focus on the elimination of domestic violence, sexual violence and economic hardship. Voucher utilization has remained 100%. Since 2009, 15 families have graduated from the program and 9 portable vouchers have been issued. This activity has increased housing choice and cost effectiveness.

- **Louisville Scholar House - Family Scholar House (formerly Project Women) (Activity #15-2009)**

Proposed and implemented in the FY 2008 Plan, LMHA allocates up to 56 vouchers to a special referral program with Family Scholar House for their Louisville Scholar House facility. Solo heads of households often face multiple barriers to furthering their education and obtaining employment that will provide their families with adequate income to become self-sufficient. Project Women participants (solo parent, attending school).

There were 20 graduates in 2012; 9 graduates from Louisville Scholar House, 8 graduates living at Downtown Scholar House, and 9 graduates who are in residence at Stoddard Johnston Scholar House. Of those:

- 3 from Louisville Scholar House were hired as full time teachers
- 1 from Downtown Scholar House hired at Metro Government
- 1 from Downtown Scholar House hired for technology position

Downtown Scholar House - Family Scholar House with Spalding University (Activity #20-2010)
This activity was proposed in the FY 2010 Plan and implemented in FY 2011. The activity is to allocate 43 Housing Choice Vouchers annually to a special referral program with Project Women and Spalding University at the Downtown Scholar House.

Stoddard Johnston Scholar House - Family Scholar House (Activity #31-2012)
This activity was proposed and approved in the FY 2012 Plan. The activity is to set-aside 57 vouchers to a special referral program with Family Scholar House for their new Stoddard Johnston Scholar House (SJSH). ***In FY 2015, LMHA will amend the SJSH activity to mirror the Parkland Scholar House Activity; the tenant-based vouchers will expire five years from participants' graduation date.***

Parkland Scholar House - Family Scholar House (Activity #38-2013)
This activity was proposed and approved in the FY 2013 Plan Amendment. The activity is to set-aside up to 53 vouchers, including 5 vouchers for participants who reside off-campus, for a special referral program with Family Scholar House for their new Parkland Scholar House Facility. Vouchers become portable upon graduation and expire five years from participant's graduation date***. In FY 2015, LMHA will amend its policies to allow graduates who enter the HCV Homeownership program to retain their voucher as long as traditional HCV rules permit.***

- **Special Referral MTW HCV Programs (Full Portability) (Activity #45-2015)**

In addition to Special Referral Programs with partners who offer programs with graduation requirements, LMHA has established local preferences for families of the Day Spring and Wellspring programs, and families referred to LMHA by organizations that provide supportive services to low-income families in the community.

Cost Effectiveness #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Staff logs; PHA financial records.				

Cost Effectiveness #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided

Data Source(s): Staff logs; PHA financial records.

Cost Effectiveness #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Self-Sufficiency #1: Increase in Household Income				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of 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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

Self-Sufficiency #3: Increase in Positive Outcomes in Employment Status
Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part- Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Self-Sufficiency #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Self-Sufficiency #8: Households Transitioned to Self Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Various				

Housing Choice #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys				

– **Wellspring - Youngland Avenue Facility (Sub-Activity #34-2012)**

This activity was proposed and approved in the FY 2012 Plan and implemented in FY 2012. The activity is to establish a special referral program and local preference to provide housing assistance to five (5)

household with members with severe mental illness who reside at Wellspring's Youngland Avenue facility while they are participating in the program. Wellspring is a charitable organization that addresses Louisville's need for supportive housing for adults with severe and persistent psychiatric illnesses. Referrals accepted for this initiative are considered as Mainstream Program participants; therefore, they receive preference on the HCV wait list.

- **Wellspring – Bashford Manor Facility (Sub-Activity #36-2013)**

This activity was proposed in the Amended FY 2012 Plan and implemented in FY 2012. The activity is to establish a special referral program and local preference to provide housing assistance to five (5) household with members with severe mental illness who reside at Wellspring's Youngland Avenue facility while they are participating in the program. Wellspring is a charitable organization that addresses Louisville's need for supportive housing for adults with severe and persistent psychiatric illnesses. Referrals accepted for this initiative are considered as Mainstream Program participants; therefore, they receive preference on the HCV wait list.

- **Day Spring (Sub-Activity #7-2008)**

This activity was initially proposed and approved in the FY 2009 Plan. It was tabled at the end of FY 2009 due to low voucher utilization and, then, re-authorized under the FY 2012 Plan. LMHA provides housing assistance to four (4) households with members who have a severe mental illness and who live in a Day Spring constructed unit while they participate in the program. Day Spring, a faith-based charitable organization, provides residential and supportive services to adults with developmental disabilities who want the opportunity to live independently in a supportive community setting. Residents who receive voucher assistance must meet the Section 8 program income requirements; however, under the initiative, not all of the residential units will be subject to typical HUD Housing Quality Standards and rent reasonableness requirements.

- **100,000 Homes Initiative (Sub-Activity #30-2012)**

Proposed and approved in FY 2012, LMHA set aside 50 vouchers to a Special Referral HCV program with the 100,000 Homes initiative of the Louisville (Substance Abuse and Mental Health Services Administration (SAMHSA) Community Consortium. This activity increases housing choices and access to services for the 50 most vulnerable homeless persons on the streets of Louisville Metro. Participants in this Housing First model program, who are identified and referred by the Louisville SAMHSA, must be chronically homeless.
New in FY15 LMHA will track the following HUD Standard Metrics for each Special Referral Program:

- **Allocate MTW Housing Choice Vouchers to Special Referral Programs (Activity #35-2012)**

Proposed and approved in FY 2012, LMHA may, without prior HUD approval, allocate up to ten (10) MTW HCVs to a Special Referral HCV program for service-enriched affordable housing programs within the Agency's jurisdiction. Eligible programs will offer housing and supportive services targeted to families whose needs are not adequately served elsewhere in the community. Some allocations may be incremental additions to existing special referral programs while others will be allocations to newly established programs. In 2012, LMHA allocated 10 vouchers to Coalition for the Homeless for homeless families with children. In 2013, the Agency allocated an additional 10 vouchers to the same referral program, as well as, 10 vouchers to Family Scholar House participants who may choose to live at York Towers being redeveloped by the Housing Partnership Inc.

A table summarizing LMHA's Special Referral Programs is following. LMHA has recently discussed its Special Referral Programs with HUD, specifically the issues related to resident choice, portability, term-limits and voucher replacement, and is in the process of determining if it would be advantageous to utilize the MTW Broader Uses of Funds Authority to convert these referral programs into a single local, non-

traditional housing program. A decision will be made by spring of 2015. If LMHA decides to create a local housing program, the Housing Authority will submit a request to HUD for Broader Uses of Funds authority and amend the FY2015 Annual MTW Plan.

LMHA Special Referral MTW Voucher Programs
Fiscal Year 2015

Organization	**Site**	**Voucher Allocation**	**FY Proposed** (FY Activity Approved, if different)	**FY First Voucher Issued**	**Portable? *Term Limited?***	**Streamlined Admission?**	**MTW Inspections?**
Center for Women and Families	Villager	22	2005	2005	Full portability upon program completion.	Yes	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and once per year concurrently.
Family Scholar House	Louisville Scholar House	56	2008	2008	Full portability upon program completion.	No	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and at recert.
Family Scholar House	Downtown Scholar House	54	2010	2011	Full portability upon program completion.	No	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and at recert.
Family Scholar House	Stoddard Johnston Scholar House	57	2012	2012	Full portability upon program completion. *5-year term limit post graduation.*	No	Yes: For initial lease-up, C.O. was used. After initial move-in, with new occupant and at recert.
Family Scholar House	Parkland Scholar House + 5 off-site	53	2012 Amended	2012	Full portability upon program completion. *5-year term limit post graduation.*	No	Yes: For initial lease-up, C.O. will be used. After initial move-in, with new occupant and at recert.
Day Spring	Day Spring constructed units	4	2009	2009, 2012*	Full portability.	Yes	No: Traditional inspection protocol.
Wellspring	Youngland Avenue	5	2012	2012	Full portability.	Yes	No: Traditional inspection protocol.
100K Homes Initiative	N/A	50	2012	2012	Full portability.	No	No: Traditional inspection protocol.
Wellspring	Bashford Manor/Newburg	8	2012	__	Full portability.	No	No: Traditional inspection protocol.
Coalition for the Homeless	N/A	20	2012	2013	Full portability.	No	No: Traditional inspection protocol.
Family Scholar House with Housing Partnership Inc.	York Towers	10	2013	__	Full portability.	No	No: Traditional inspection protocol.

*Referral program suspended during FY2010 and FY2011.

- **MTW Unit Inspection Protocol (Activity #2-1999)**

Unit inspections of facilities at LMHA's Section 8 certificate programs that are managed by organizations, with which the Agency has had a long-term and outstanding relationship, are waived upon initial occupancy and held once per year concurrently. Section 8 certificate programs include YMCA SRO, Roberts Hall and St. Vincent de Paul, and Willow Place. These facilities have been receiving assistance for over 10 years. This activity has significantly reduced costs to inspect the units "tied" to these programs. In 2013, LMHA began inspecting units at Villager at the Center for Women and Families once per year, concurrently. At the time of initial occupancy by voucher holders, the units were new and had achieved certificate of occupancy issued by Metro Louisville inspectors. No changes are anticipated in 2015. LMHA will evaluate the activity using the HUD Standard metrics following in the FY 2014 MTW Annual Report:

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided
Data Source(s): Emphasys; Staff logs; PHA financial records.				

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	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.
	tbd	tbd	tbd	tbd
				Explanation to be provided

Data Source(s): Emphasys; Staff logs; PHA financial records.

Cost Effectiveness #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
				Explanation to be provided.
Data Source(s): Staff logs.				

- **Amend HCV Admissions Policy to Allow for Deduction of Child-Care Expenses in Determination of Eligibility (Activity #27-2011)**

This activity was proposed and implemented in FY 2011. LMHA amended its Housing Choice Voucher Program and Public Housing Admissions Policy to allow for the deduction of verified ongoing child-care expenses from a working household's gross income when determining income eligibility. In order to qualify for the adjustment, the family must include a head of household and/or spouse with a demonstrated work history for a period of 12 months or longer. While this activity was designed to increases housing choice for working families with children who may be struggling to make ends meet, LMHA has determined that it achieves the HUD Standard metrics of Reducing the per unit subsidy costs for participating households and Increases Agency Rental Revenue. No changes to this activity are anticipated in FY 2015. LMHA will report on the outcomes of this activity using the HUD Standard metrics in the FY 2014 MTW Annual Report:

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Section 8 subisdy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd

	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars) prior to implementation.	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).as of 6/30/15.	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).as of 6/30/15.	Explanation to be provided
Data Source(s): Emphasys				

CE #7: Increase in Agency Rental Revenue				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	tbd	tbd	tbd	tbd
	Sum of gross (net) annual rent revenue from households who received the deduction to determine eligibility.	Expected *sum* of gross (net) annual rent revenue from households who received the deduction to determine eligibility as of 6/30/15.	Actual *sum* of gross (net) annual rent revenue from households who received the deduction to determine eligibility as of 6/30/15.	Explanation to be provided.
Data Source(s): Emphasys; PHA financial records				

B. MTW Activities Not Yet Implemented

- **Acquisition of Mixed-Income Sites for Public Housing (Activity #26-2011)**

This activity was proposed and implemented in the FY 2011 Plan; however the new policy has not been used to acquire property at mixed-income sites. The activity is acquire units for public housing or vacant land for developing public housing without prior HUD authorization if HUD does not respond to LMHA's request for authorization within 10 days of the submittal date. All acquired properties shall meet HUD's site selection requirements. LMHA will request approval of the HUD Field Office when a pending acquisition deviates from the selection requirements and/or at the discretion of the Executive Director. Copies of all required forms and appraisals will be maintained in the project file. No changes to this activity are expected to be made in FY 2015. LMHA will implement the activity if and when it is advantageous to utilize the purchasing flexibility (i.e., HUD has not responded to LMHA's request for authorization within 10 days of the submittal date). LMHA will use the HUD Standard Metrics to assess the outcomes of this activity.

- **Develop Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing (Activity #28-2011)**

This activity was proposed in FY 2011 and implemented in FY 2012. The activity is to explore using MTW authority to create locally defined guidelines for the re/development, maintenance and modernization of public housing. LMHA will develop reasonable and modest design guidelines, unit size guidelines and unit amenity guidelines for new and ongoing public housing development activities. The criteria focus on strategies for developing sustainable housing, preserving affordable housing and developing low-income housing in low-concentration, non-impacted areas of the Agency's jurisdiction. Strategies include rehabilitation and new construction standards that reduce energy consumption including Energy Star criteria and increase the supply of accessible housing in the community. Planning for this activity will be ongoing in FY 2015 during which time LMHA anticipates it will submit proposed guidelines for HUD's review.

C. MTW Activities On Hold

- **Public Housing Sublease Agreement with Catholic Charities (Activity #25-2010)**

Proposed and approved in the FY 2010 Plan, this activity has been tabled. HUD OGC investigated the use of public housing as emergency housing for victims of human trafficking and found that it was not feasible under MTW to permit families who could not produce valid identification to live in public housing communities. This activity will remain on hold until such time that HUD OGC and LMHA find resolution, allowing victims of human trafficking to receive much-needed housing assistance.

D. Closed-Out MTW Activities

- **Increased Flat Rents (Activity #24-2010)**

LMHA proposed this initiative in the 2010 Annual Plan and it was approved by HUD. It was subsequently closed-out FYE 2011. LMHA proposed flat rents for the Agency's scattered sites be raised and adjusted based on the square footage, location, age and amenities at the property as rent comparables for the site are completed. LMHA will not implement this activity in lieu of adopting the MTW policy total tenant payment is calculated based on 30% of income, which was approved in the FY 2012 Plan, marking the "close out" of the Flat Rent Activity.

- **Spatial Deconstruction of HCV Assisted Units (Activity #5-2007)**

LMHA proposed this initiative in the 2007 Annual Plan and it was approved by HUD. The activity was to limit the concentration of Housing Choice Voucher assisted units in complexes of one hundred or more units to 25% (excluding both elderly/disabled and special referral program sites). This activity was closed-out at fiscal yearend 2009 because of its potential to limit voucher holders' universe of housing choices.

- **Rents Set at 30% of Adjusted Income – Public Housing Program (Activity #33-2012)**

Proposed and implemented in the FY 2012 Plan, families receiving rental assistance under the Public Housing program will pay either 30% of their monthly adjusted income for rent, or the minimum rent established by the LMHA, whichever is higher.

In 2012, LMHA proposed to eliminate flat rents and, upon further consideration, because the Authority's housing stock includes units financed with tax credits, LMHA is considering an amendment to the activity. LMHA may amend the activity to include "ceiling rents" that will vary by bedroom size and that will be in accordance with the annual tax-credit ceiling rents, as published by the Kentucky Housing

Corporation (KHC). KHC is the tax credit allocating agency for the Commonwealth of Kentucky. The proposal to change this activity will be made via a future Plan amendment including the planned ceiling rents and the associated impact analysis as required by the Agency's Standard MTW Agreement with HUD.

In 2014, LMHA decided not to pursue this activity. Instead, the Agency revised its flat rent structure. LMHA anticipates that higher flat rents will achieve the goals of the proposed activity within HUD's existing regulatory framework. The activity was officially closed-out fiscal yearend 2014.

- **Flexibility in Third-Party Verifications for HCV Homeownership (Activity #11-2009)**

Proposed and implemented in the FY 2009 Plan, applicants to the HCV Homeownership program are allowed to provide income verification including employment verification from employer, child support verification, statements for all bank accounts, proof of CDs at the bank, pension plan verification and proof of all medical costs including prescriptions. Also, income verification is valid for 8 months. Cost savings through the elimination of staff time spent obtaining verifications and conducting reviews has been achieved.

LMHA has determined that due to a recent change in HUD regulations MTW authority is no longer necessary to a portion of the activity above. This portion of the activity was ended in FY 2014. LMHA will continue to seek regulatory relief for making income verifications valid for 8 months.

- **Explore HUD's Streamlined Demolition and Disposition Application Process for MTW Agencies (Activity #16-2009)**

Proposed and approved in the FY 2009 Plan, this activity was never implemented. HUD investigated the possibility of streamlined demolition/disposition activities for MTW agencies but found that it was not feasible under MTW. Out of concern for residents' rights and the public process, HUD decided that MTW agencies must follow the established procedures for demolition and disposition of property. This activity was officially closed-out FYE 2014.

V. Sources and Uses of Funds

Generally, the Sources and Uses of Funds section is a pre-formatted Microsoft Excel table has been provided by HUD for Public Housing Authorities (PHAs) to report the required information.

Annual MTW Plan

V.1.Plan.Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	5,922,000
70600	HUD PHA Operating Grants	91,903,187
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	-
71100+72000	Interest Income	60,447
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	428,925
70000	Total Revenue	98,314,559

Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	6,865,035
91300+91310+92000	Management Fee Expense	5,430,913
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	1,304,331
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	6,626,764
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	11,277,441
95000 (95100+95200+95300+95500)	Total Protective Services	1,312,850
96100 (96110+96120+96130+96140)	Total insurance Premiums	661,947
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	197,011
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	6,543,601
97300+97350	Housing Assistance Payments + HAP Portability-In	57,974,320
97400	Depreciation Expense	4,757,000
97500+97600+97700+97800	All Other Expenses	-
90000	Total Expenses	102,951,213

Describe the Activities that Will Use Only MTW Single Fund Flexibility
The LMHA activities that will use only MTW Single-Fund Budget Authorityvare described below: **• Homeownership Maintenance Specialist (planning) (Activity #12-2009)** Though LMHA proposed this initiative in the 2009 Annual Plan, and it was approved by HUD, the Housing Authority has not yet fully implemented the activity. LMHA plans to restructure the current homeownership inspection, training and consultation process (these three duties are currently split among different individuals) and instead steer all the tasks through a Home Maintenance Staff (HMS). Annually, LMHA evaluatesinternal staff capacity to perform these duties. LMHA may hire an HMS in FY 2014, if LMHA determines the HMS would be beneficial. **• MultiCultural Family Assistance Program (ongoing) (Activity #17-2009)** This activity was proposed in the LMHA FY 2008 Plan and will be implemented this calendar year. Louisville continues to experience a growing demand from Somali and other African immigrant families living in the Metro area for housing and social and support services. Since these families have differing beliefs, customs and lifestyles that can pose a challenge to adapting to a very different country and culture, LMHA has proposed to hire a staff person who is knowledgeable about African-immigrant cultures and languages. The staff will be able to address both the needs of the families and the Agency while assisting in property management, operations and lease enforcement. LMHA implemented this activity in FY 2012. No changes are anticpated for FY 2015. **• HCV Homeownership Weatheriztion and Energy Efficiency Pilot (completed) (Activity #19-2010)** **• Avenue Plaza CFL Trade-in Program (completed) (Activity #22-2010)**

Additional **Uses of MTW Single Fund Flexibility:**

- Approx. $7,623,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Public Housing Program. This will occur to fund: a) the anticipated operating fund subsidy shortfall of $3,100,000 in the Public Housing program for calendar year 2014 and 2015; b) the recent change in CFP regulations that no longer allows protective services costs ($1,100,000)[1] and resident stipends ($58,000) to be funded directly from CFP (resulting in moving those items to the operating budget); and c) the continued ability to operate AMPs at a high level and maintain a balanced operating budget. The HUD approved project expense levels (PEL) at some AMPs do not adequately provide for management services at the level deemed necessary by LMHA.
- Although LMHA has traditionally made transfers to the public housing program from both the CFP program and Section 8 program in past years, the proposed budget year's transfer is made entirely from the Section 8 program. However, LMHA wishes to retain the authority and flexibility to transfer CFP funds as necessary under current MTW regulations.

[1] Although CFP regulations have changed regarding the eligibility of protective services costs, LMHA's Amended and Restated Moving to Work Agreement, dated 12/11/07, and executed 4/15/08, contains specific language on this matter. Attachment C (Statement of Authorizations), Section B (Authorizations Related to Both Public Housing and Section 8 Housing Choice Vouchers), item b. part v. states that certain provisions of Sections 8 and 9 of the 1937 Act and 24 C.F.R. 982 and 990 are waived regarding the use of full funding flexibility for "The provision of safety, security, and law enforcement measures and activities appropriate to protect residents of housing from crime". Consequently, LMHA believes that protective services costs remain eligible under the CFP program as a component of the MTW Program.

- Although LMHA utilizes the funding fungibility available in the MTW Program, LMHA adheres to all statutes and regulations relative to HUD's asset management program. All budgeting and reporting within the public housing program is done on an individual site basis, and LMHA utilizes a "fee for service" methodology that charges sites only for the services they receive.

The Cotter and Lang HOPE VI Revitalization project included the construction of four on-site rental housing phases. The financing of these phases included the use of Low Income Housing Tax Credits. In an effort to keep the units affordable, LMHA intends to acquire each phase when its tax credit compliance period expires. To this end, LMHA acquired full ownership of Phase I (The Oaks) in 2013. The tax credit compliance period for Phase II has now ended, and LMHA plans to acquire these 213 units during Fall 2015. In furtherance of this acquisition, the Housing Authority will use approximately $2.1 million in Section 8 Funds to retire debt owed on the project.

In addition, LMHA will use approximately $1.2 million in Section 8 Funds to replace failing boilers and chillers at its Section 8 Office, located at 801 Vine Street, Louisville, KY 40204.

V.2.Plan.Local Asset Management Plan			
B. MTW Plan: Local Asset Management Plan			
Is the PHA allocating costs within statute?	Yes	or	
Is the PHA implementing a local asset management plan (LAMP)?		or	No
If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.			
Has the PHA provided a LAMP in the appendix?		or	No
PHAs should provide a brief summary of any changes in the Local Asset Management Plan in the body of the Plan.			

VI. Administrative

A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B);

RESOLUTION NO. 55-2014 (8/19/14)

APPROVAL OF LMHA'S MOVING TO WORK PROGRAM FY 2015 ANNUAL PLAN

Item No. 5a

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville (HAL), executed a Moving to Work (MTW) Agreement on August 2, 1999 and an Amended and Restated Agreement on April 15, 2008 which provides LMHA with the authority to investigate and adopt new policies and to flexibly use HUD funding; and

WHEREAS, as part of the Amended and Restated MTW agreement, an Annual Plan for Fiscal Year 2015 must be developed and submitted to HUD to formally enable the Authority to fully use the policy and budget flexibility provided to participants in the MTW Program; and

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

WHEREAS, the proposed FY 2015 MTW Annual Plan was made available for public comment on May 23, 2014 and conducted a Public Hearing on June 4, 2014 to discuss the proposed FY 2015 MTW Annual Plan; and

WHEREAS, LMHA made revisions to the proposed FY 2015 MTW Annual Plan, and the revised version of the proposed FY 2015 MTW Annual Plan was made available for public comment on June 13, 2014, and the public comment period was extended through July 13; and

WHEREAS, LMHA held a second Public Hearing on June 26, 2014 to discuss the revisions to the proposed FY 2015 MTW Annual Plan; and

WHEREAS, LMHA had discussions with HUD about the community's comments and made additional revisions to the proposed FY 2015 MTW Annual Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2015 MTW Annual Plan is approved, and that the Executive Director and Contracting Officer, Tim Barry, is hereby authorized to execute and submit this plan to the U.S. Department of Housing and Urban Development.

cc: Tim Barry
Wavid Wray

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF LMHA'S MOVING TO WORK PROGRAM FY 2015 ANNUAL PLAN

Item No. 5a

I. STATEMENT OF FACTS

Moving to Work (MTW) is a demonstration program legislated by Congress in 1996 that provides increased autonomy for selected Public Housing Authorities (PHAs) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families. MTW legislation allows participating housing authorities to combine federal resources from the Operating Budget, Capital Fund and the Housing Choice Voucher Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

In October 1997, the former Housing Authority of Louisville (HAL) was chosen as one of 24 MTW demonstration awardees. HAL'S MTW agreement, which specified the regulatory relief afforded to the organization, was finalized and signed on August 2, 1999, and was originally for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority, was to expire as of June 30, 2005. LMHA was fortunate to receive a one-year extension, followed by an additional three-year extension.

On December 20, 2007 HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board in a resolution on April 15, 2008 and will extend participation in the MTW program until June 30, 2019.

MTW demonstration agencies are still required to prepare and submit MTW Annual Plans in lieu of the Public Housing Annual Plan as is currently required of other agencies. The FY 2015 MTW Annual Plan will be for the fiscal year beginning July 1, 2014 to June 30, 2015.

The proposed FY 2015 MTW Annual Plan containing the MTW Activity Housing Choice Voucher (HCV) Rent Reform Study was made available for public comment beginning May 23, 2014. A public hearing to discuss the proposed FY 2015 Annual Plan and HCV Rent Reform Study was held on June 4, 2014.

The proposed HCV Rent Reform Study is a test of the ability of an alternative rent policy to achieve the MTW goals of incentivizing families to go to work and achieving greater cost effectiveness of federal expenditures. As initially proposed, the

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF LMHA'S MOVING TO WORK PROGRAM FY 2015 ANNUAL PLAN

Item No. 5a

I. STATEMENT OF FACTS CONT.

HCV Rent Reform Study specified that households under the alternative rent policy would be recertified triennially; would have their rent set at either the $100 minimum rent or an amount based on 28% of retrospective gross (meaning without deductions or allowances) income, whichever is higher, unless the household should qualify for a temporary rent based on 28% of current/anticipated gross income or a hardship waiver; and would not be able to "opt-out" of the alternative policy.

In response to public comments, LMHA made changes to the proposed HCV Rent Reform Study including lowering the minimum rent to $75 and extending the hardship waiver period from 90 days to 180 days. The revised version of the proposed FY 2015 MTW Annual Plan was made available for public comment beginning June 13, 2014 and discussed at a Public Hearing on June 26, 2014 and at the July 15, 2014 Board meeting, where the community expressed concern about the Rent Reform Study. LMHA has had discussions with HUD about their concerns and has made additional changes to the proposed Rent Reform Study. The changes include a further reduction of the minimum rent down to $50; an "opt-out" provision for households that have been randomly assigned to the alternative rent policy; and an exclusion of households currently taking a child care deduction from the pool of eligible participants.

The public comment period, public hearings, and responses to public comments were provided prior to submission of the FY 2015 Annual Plan to HUD. As part of the FY 2015 MTW Annual Plan submission, Manfred Reid, Sr., Chairman will be required to certify a number of statements as required by HUD. A list of these certifications is attached.

II. ALTERNATIVES

A. Approve the resolution authorizing the submission of the proposed FY 2015 Moving to Work Annual Plan.

B. Do not approve the resolution authorizing submission of the proposed FY 2015 Moving to Work Plan.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF LMHA'S MOVING TO WORK
PROGRAM FY 2015 ANNUAL PLAN

Item No. 5a

Page 3

III. RECOMMENDATION

Staff recommends Alternative "A".

IV. JUSTIFICATION

- LMHA, in consultation with residents and the community, has developed the proposed FY 2015 Moving to Work Annual Plan.
- Approval of this resolution is a contractual requirement under the Moving to Work program that will allow LMHA to move forward and take advantage of the flexibility afforded to Moving to Work sites.

Submitted by: Tim Barry
Executive Director
August 19, 2014

OMB Control Number: 2577-0216
Expiration Date: 5/31/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
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 Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 7/1/14 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 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 PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The 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 PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The 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.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The 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 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.
16. With respect to public housing the 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The 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.
21. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Louisville Metro Housing Authority	KY-01
PHA Name	PHA Number/HA Code

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

Manfred Reid, Sr.	Chairman
Name of Authorized Official	Title
Manfred Reid, Sr.	8/21/2014
Signature	Date

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates, locations of public hearings and total number of attendees for the draft Annual MTW Plan, (to ensure PHAs have met the requirements for public participation, HUD reserves the right to request additional information to verify PHAs have complied with all requirements as set forth in the Standard MTW Agreement);

The proposed FY 2015 MTW Annual Plan was made available for public comment on May 23, 2014 and LMHA conducted a Public Hearing on June 4, 2014 in the 2nd Floor Community Room at Avenue Plaza (located at 420 South 8th Street, Louisville, KY 20203) to discuss the proposed FY 2015 MTW Annual Plan. The hearing was advertised in the Courier-Journal on [date]. Approximately 48 people were in attendance.

LMHA responded to concerns stated during the Public Hearing and Public Comment Period with revisions to the proposed FY 2015 MTW Annual Plan, and the revised version of the proposed FY 2015 MTW Annual Plan was made available for public comment on June 13, 2014 and the public comment period was extended through July 13. LMHA held a second Public Hearing, which was also held in the 2nd Floor Community Room at Avenue Plaza, on June 26, 2014 to discuss the revisions to the proposed MTW Annual Plan. There were approximately 104 attendees at the hearing.

Additional documentation of the public process, including the written comments and concerns of the community, as well as the transcripts from the public hearings are included in Appendix E, Documentation of Public Process.

C. Description of any planned or ongoing PHA-directed evaluations of the demonstration for the overall MTW program or any specific MTW activities, if applicable;

LMHA has not directed an evaluation of its MTW program beyond those to be conducted and reported on in the MTW Annual Report and the impact analysis and annual reevaluation of ongoing rent reform initiatives.

D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD for MTW and non-MTW Capital Fund grants for each grant that has unexpended amounts, including estimates for the Plan Year and all three parts of the report;

The Annual Statement/Performance and Evaluation Reports (HUD 50075.1) are following.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:		
Louisville Metro Housing Auth	Grant Type and Number Capital Fund Program Grant No: KY 36 P 001 501 11 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2011 FFY of Grant Approval: 2011

Type of Grant
Original Annual Statement Reserve for Disasters/Emergencies x Revised Annual Statement (revision no: 5)
Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]	2,446,000	2,446,000	2,446,000	1,041,575
3	1408 Mangagment Improvements	1,871,248	2,487,714	2,482,714	2,060,264
4	1410 Administration (may not exceed 10% of line 21)	884,251	884,251	889,251	884,631
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	250,000	250,000	250,000	0
8	1440 Site Acquisition				
9	1450 Site Improvement	59,997	59,997	59,997	400
10	1460 Dwelling Structures	2,602,714	365,660	365,660	197,901
11	1465.1 Dwelling Equipment-Nonexpendable	112,254	47,167	47,167	0
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]	491,852	2,301,716	2,301,716	0

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2011
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 11 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2011

Type of Grant

x Original Annual Statement — Reserve for Disasters/Emergencies — x Revised Annual Statement (revision no: 5)

Performance and Evaluation Report for Period Ending: — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	124,189	0	0	
20	Amount of Annual Grant:: (sum of lines 2-19)	8,842,505	8,842,505	8,842,505	4,184,771
21	Amount of line 20 Related to LBP Activities	150,000	150,000	150,000	
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs	1,730,248	2,273,714	2,273,714	1,919,264
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director	Date	Signature of Public Housing Director	Date
[signature]	7/8/2013	[signature]	8/21/13

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 11 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2011

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Beecher Terr KY 1-2	Admin Salaries	1410	100%	181,883	181,883	181,883	181,883	
Beecher Terr KY 1-2	HALO Community Policing	1408	100%	77,188	77,188	77,188	77,188	
Beecher Terr KY 1-2	Eviction Prevention Program	1408	100%	37,368	37,368	37,368	37,368	
Beecher Terr KY 1-2	Annual AE Contract	1430	100%	29,310	29,310	29,310		
Beecher Terr KY 1-2	Tree Trimming	1450	100%	15,000	15,000	15,000		
Beecher Terr KY 1-2	Dwelling Equip - Ranges and Refrigerator	1465	19	20,000	8,000	8,000		
Parkway Pl KY 1-3	Admin Salaries	1410	100%	151,689	151,689	151,689	151,689	
Parkway Pl KY 1-3	HALO Community Policing	1408	100%	77,188	77,188	77,188	77,188	
Parkway Pl KY 1-3	Eviction Prevention Program	1408	100%	33,729	33,729	33,729	33,729	
Parkway Pl KY 1-3	Annual AE Contract	1430	100%	30,561	30,561	30,561		
Parkway Pl KY 1-3	Tree Trimming	1450	100%	15,000	15,000	15,000		
Parkway Pl KY 1-3	Roof Replacement	1460	10	100,000	100,000	100,000	86,145	
Parkway Pl KY 1-3	Dwelling Equip - Ranges and Refrigerator	1465	19	20,000	8,000	8,000		
Parkway Pl KY 1-3	Resident Stipends - Security Activities - S	1408	2		5,000	5,000	360	
Parkway Pl KY 1-3	Resident Services Parkway Parks Progra	1408	100%		68,000	68,000		
Sheppard Square KY 1-4	Development ~~Comprehensive Modernization~~	1499	100%	491,852	2,301,716	2,301,716		
Sheppard Square KY 1-4	HALO Community Policing	1408	100%	35,625	35,625	35,625	35,625	
Sheppard Square KY 1-4	Eviction Prevention Program	1408	100%	5,767	5,767	5,767	5,767	
Sheppard Square KY 1-4	Admin Salaries	1410	100%	78,121	78,121	78,121	78,121	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 11 CFFP (Yes/No): Replacement Housing Factor Grant No:	2011

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Dosker Manor Ky 1-12	Admin Salaries	1410	100%	163,910	163,910	163,910	163,910	
Dosker Manor Ky 1-12	High Rise Security Guards	1408	100%	969,027	1,334,464	1,334,464	1,134,464	
Dosker Manor Ky 1-12	Eviction Prevention Program	1408	100%	26,281	26,281	26,281	26,281	
Dosker Manor Ky 1-12	Annual AE Contract	1430	100%	40,341	40,341	40,341		
				0	0			
Dosker Manor Ky 1-12	Dwelling Equip - Ranges and Refrigerator	1465	19	25,000	8,000	8,000		
Dosker Manor Ky 1-12	Resident Stipends - Security Activities - S	1408	75	21,750	21,750	21,750		
St. Catherine KY 1-13	Admin Salaries	1410	100%	38,102	38,102	38,102	38,102	
St. Catherine KY 1-13	High Rise Security Guards	1408	100%	165,149	223,416	223,416	191,416	
St. Catherine KY 1-13	Eviction Prevention Program	1408	100%	3,027	3,027	3,027	3,027	
St. Catherine KY 1-13	Resident Stipends - Security Activities - S	1408	22	8,100	8,100	8100		
Avenue Plaza KY 1-14	Admin Salaries	1410	100%	71,171	71,171	71,171	71,171	
Avenue Plaza KY 1-14	High Rise Security Guards	1408	100%	169,962	232,636	232,636	200,636	
Avenue Plaza KY 1-14	Eviction Prevention Program	1408	100%	9,867	9,867	9,867	9,867	
Avenue Plaza KY 1-14	Annual AE Contract	1430	100%	14,988	14,988	14,988		
Avenue Plaza KY 1-14	Dwelling Equip - Ranges and Refrigerator	1465.1	10	10,000	4,000	4,000		
Avenue Plaza KY 1-14	Resident Stipends - Security Activities	1408	26	11,300	11,300	11,300		
Scattered Sites KY 1-17	Admin Salaries	1410	100%	65,420	65,420	65,420	65,420	
Scattered Sites KY 1-17	Annual AE Contract	1430	100%	7,978	7,978	7,978		
Scattered Sites KY 1-17	Eviction Prevention Program	1408	0	0	0			

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 11 CFFP (Yes/No): Replacement Housing Factor Grant No:	2011

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Scattered Sites KY 1-17	Tree Trimming	1460	100%	29,997	29,997	29,997	400	
Scattered Sites KY 1-17	Dwelling Equip - Ranges and Refrigerators	1465.1	18	10,744	7,584	7,584		
Scattered Sites KY 1-34	Admin Salaries	1410	100%	97,531	97,531	97,531	97,531	
Scattered Sites KY 1-34	Annual AE Contract	1430	100%	13,745	13,745	13,745		
Scattered Sites KY 1-34	Tuckpointing 2400 Chestnut	1460	0	0	0			
Scattered Sites KY 1-34	Dwelling Equip - Ranges and Refrigerators	1465.1	16	18,510	7,583	7,583		
Scattered Sites KY 1-34	Friary Comprehensive Modernization	1460	0	2,087,054	0			
Scattered Sites KY 1-34	Roof Replacement - SbMl,Landside,Orms	1460	29	0	10,000	10,000	6,050	
Scattered Sites KY 1-34	Coral Avenue Rehab	1460	0	60,000	0			
Scattered Sites KY 1-34	Noltemeyer Fire Damage Unit	1460	0	100,000	0	0		
Lourdes Hall KY 1-18	Admin Salaries	1410	100%	36,424	36,424	36,424	36,424	
Lourdes Hall KY 1-18	Dwelling Equip - Ranges and Refrigerator	1465.1	10	8,000	4,000	4,000		
Lourdes Hall KY 1-18	Resident Stipends	1408	20	17,300	17,300	17,300		
Lourdes Hall KY 1-18	High Rise Security Guards	1408	100%	177,659	234,747	234,747	202,747	
Lourdes Hall KY 1-18	Eviction Prevention Program	1408	100%	24,961	24,961	24,961	24,961	
Bishop Lane KY 1-40	Annual AE Contract	1430	100%	13,077	13,077	13,077		

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name: Louisville Metro Housing Authority		Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/No): Replacement Housing Factor Grant No:				Federal FFY of Grant:		
Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Park DuValle	Phase III Mixed Fin Cap Contribution	1460	100%	40,317	40,317	40,317	40,317	
Park DuValle	Phase IV Mixed Fin Cap Contribution	1460	100%	65,343	65,343	65,343	65,345	
Administration	Environmental Contract	1430	100%	100,000	100,000	100,000		
Administration	Annual Asbestos/Lead Removal	1460	100%	150,000	150,000	150,000	44	
Administration	Funding Operation	1406	100%	2,446,000	2,446,000	2,446,000	1,041,575	
Administration	Contingency	1502	0	124,189	-			
				8,842,505	8,842,505	8,842,505	4,184,771	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2012
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 12 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2012

Type of Grant
Original Annual Statement — Reserve for Disasters/Emergencies — x — Revised Annual Statement (revision no: 3)
Performance and Evaluation Report for Period Ending: — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]	1,800,000	1,800,000	0	0
3	1408 Mangagment Improvements	748,190	101,400	101,400	54,400
4	1410 Administration (may not exceed 10% of line 21)	766,610	766,610	766,610	766,610
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	450,000	450,000	450,000	0
8	1440 Site Acquisition				
9	1450 Site Improvement	11,100	11,100	0	0
10	1460 Dwelling Structures	3,012,057	3,182,085	460,013	160,013
11	1465.1 Dwelling Equipment-Nonexpendable	0	0	0	0
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	5,400	5,400	0	0
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]	736,214	736,214	736,214	0

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:		
Louisville Metro Housing Auth	**Grant Type and Number** Capital Fund Program Grant No: KY 36 P 001 501 12 Replacement Housing Factor Grant No: Date of CFFP:	**FFY of Grant:** 2012 **FFY of Grant Approval:** 2012

Type of Grant

x **Original Annual Statement** **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no: 3)**
Performance and Evaluation Report for Period Ending: **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	136,525	613,287	0	
20	Amount of Annual Grant:: (sum of lines 2-19)	7,666,096	7,666,096	2,514,237	981,023
21	Amount of line 20 Related to LBP Activities	150,000	150,000	150,000	
22	Amount of line 20 Related to Section 504 Activities	5,100	5,100	0	0
23	Amount of line 20 Related to Security - Soft Costs	694,290	47,500	47,500	47,500
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measu	16,447	20,000	16,988	16,988

Signature of Executive Director	Date	Signature of Public Housing Director	Date

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Beecher Terr KY 1-2	Admin Salaries	1410						
Beecher Terr KY 1-2	HALO Community Policing	1408	100%	24,040	23,750	23,750	23,750	
Beecher Terr KY 1-2	Eviction Prevention Program	1408	100%	22,330	22,330	22,330	6,900	
Beecher Terr KY 1-2	Annual AE Contract	1430	100%	29,310	29,310	29,310		
Beecher Terr KY 1-2	Tree Trimming	1450	100%	2,000	2,000			
Beecher Terr KY 1-2	Dwelling Equip - Ranges and Refrig	1465						
Beecher Terr KY 1-2	Handicapped and Wheelchair Ramps	1450	100%	5,100	5,100			
Parkway Pl KY 1-3	Admin Salaries	1410						
Parkway Pl KY 1-3	HALO Community Policing	1408	100%	25,800	23,750	23,750	23,750	
Parkway Pl KY 1-3	Eviction Prevention Program	1408	100%	16,170	16,170	16,170		
Parkway Pl KY 1-3	Annual AE Contract	1430	100%	30,561	30,561	30,561		
Parkway Pl KY 1-3	Tree Trimming	1450	100%	2,000	2,000			
Parkway Pl KY 1-3	Fire Damage Bldg 17	1460	10	100,000	100,000			
Parkway Pl KY 1-3	Dwelling Equip - Ranges and Refrig	1465						
Sheppard Square KY 1-4	Comprehensive Modernization	1499	100%	736,214	736,214	736,214		
Sheppard Square KY 1-4	HALO Community Policing	1408						
Sheppard Square KY 1-4	Eviction Prevention Program	1408						
Sheppard Square KY 1-4	Admin Salaries	1410						

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Dosker Manor Ky 1-12	Admin Salaries	1410						
Dosker Manor Ky 1-12	High Rise Security Guards	1408	100%	419,640	0			
Dosker Manor Ky 1-12	Eviction Prevention Program	1408	100%	1,540	1,540	1,540		
Dosker Manor Ky 1-12	Annual AE Contract	1430	100%	40,341	40,341	40341		
Dosker Manor Ky 1-12	Buss Duct/-Raceway Bldg B	1460	198	20,000	20,000			
Dosker Manor Ky 1-12	Dwelling Equip - Ranges and Refrig	1465						
Dosker Manor Ky 1-12	Resident Stipends - Security Activities - S	1408	75	21,750	0			
St. Catherine KY 1-13	Admin Salaries	1410						
St. Catherine KY 1-13	High Rise Security Guards	1408	100%	53,160				
St. Catherine KY 1-13	Eviction Prevention Program	1408	100%	770	770	770		
St. Catherine KY 1-13	Resident Stipends - Security Activities - S	1408	22	8,100	0			
Avenue Plaza KY 1-14	Admin Salaries	1410						
Avenue Plaza KY 1-14	High Rise Security Guards	1408	100%	50,880				
Avenue Plaza KY 1-14	Eviction Prevention Program	1408	100%	3,080	3,080	3,080		
Avenue Plaza KY 1-14	Annual AE Contract	1430	100%	14,988	14,988	14,988		
Avenue Plaza KY 1-14	Dwelling Equip - Ranges and Refrig	1465						
Avenue Plaza KY 1-14	Resident Stipends - Security Activities	1408	26	11,300	0			
Avenue Plaza KY 1-14	Window Replacement and PTAC Units	1460	100%	16,447	20,000	16,988	16,988	
Avenue Plaza KY 1-14	Paint and Drywall Repair - 16 Floors	1460	0%	0	0			
Avenue Plaza KY 1-14	Elevator Lobby / Paint / Drywall	1460	100%	131,725	188,188	2,253	2,253	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Scattered Sites KY 1-17	Admin Salaries	1410						
Scattered Sites KY 1-17	Annual AE Contract	1430	100%	7,978	7,978	7,978		
Scattered Sites KY 1-17	Eviction Prevention Program	1408	100%	3,850	3,850	3,850		
Scattered Sites KY 1-17	Tree Trimming	1450	100%	2,000	2,000			
Scattered Sites KY 1-17	Dwelling Equip - Ranges and Refrig	1465						
Scattered Sites KY 1-34	Admin Salaries	1410						
Scattered Sites KY 1-34	Annual AE Contract	1430	100%	13,745	13,745	13,745		
Scattered Sites KY 1-34	St Martins Basement Upgrades	1460	26	88,000	103,618	31,941	31,941	
Scattered Sites KY 1-34	Dwelling Equip - Ranges and Refrig	1465						
Scattered Sites KY 1-34	Friary Comprehensive Modernization	1460	24	2,087,054	2,281,448			
Scattered Sites KY 1-34	Roof Replacement - Six Mi,Landside,orm	1460						
Scattered Sites KY 1-34	Coral Avenue Rehab	1460	2	60,000	60,000			
Scattered Sites KY 1-34	Noltelmeyer Fire Damage	1460	4	100,000	0			
Scattered Sites KY 1-34	St Martins Condensor Platform	1460						
Lourdes Hall KY 1-18	Admin Salaries	1410						
Lourdes Hall KY 1-18	Dwelling Equip - Ranges and Refrig	1465						
Lourdes Hall KY 1-18	Resident Stipends	1408	20	17,300	0			
Lourdes Hall KY 1-18	High Rise Security Guards	1408	100%	62,320				
Lourdes Hall KY 1-18	Eviction Prevention Program	1408	100%	6,160	6,160	6,160		
Lourdes Hall KY 1-18	Washing Machines for Laundry Mats	1475	100%	5,400	5,400			
Bishop Lane KY 1-40	Annual AE Contract	1430	100%	13,077	13,077	13,077		

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name: Louisville Metro Housing Authority	**Grant Type and Number** Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	**Federal FFY of Grant:** 2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Park DuValle	Phase II Mixed Fin Cap Contribution	1460	0					
Park DuValle	Phase III Mixed Fin Cap Contribution	1460	100%	41,527	41,527	41,527	41,527	
Park DuValle	Phase IV Mixed Fin Cap Contribution	1460	100%	67,304	67,304	67,304	67,304	
Administration	Environmental Contract	1430	100%	300,000	300,000	300,000		
Administration	Annual Asbestos/Lead Removal	1460	100%	300,000	300,000	300,000		
Administration	Transfer	1410	100%	766,610	766,610	766,610	766,610	
Administration	Funding Operation	1406	100%	1,800,000	1,800,000			
Administration	Contingency	1502		136,525	613,287			
				7,666,096	7,666,096	2,514,237	981,023	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

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form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
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Expires 4/30/2011

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evalutation Report

U.S. Department of Housing and Urban Development

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2012
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 12 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2012

Type of Grant
Original Annual Statement — Reserve for Disasters/Emergencies — x — Revised Annual Statement (revision no: 3)
Performance and Evaluation Report for Period Ending: — Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]	1,800,000	1,800,000	0	0
3	1408 Mangagment Improvements	748,190	101,400	101,400	54,400
4	1410 Administration (may not exceed 10% of line 21)	766,610	766,610	766,610	766,610
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	450,000	450,000	450,000	0
8	1440 Site Acquisition				
9	1450 Site Improvement	11,100	11,100	0	0
10	1460 Dwelling Structures	3,012,057	3,182,085	460,013	160,013
11	1465.1 Dwelling Equipment-Nonexpendable	0	0	0	0
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	5,400	5,400	0	0
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]	736,214	736,214	736,214	0

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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OMB No. 2577-0226
Expires 3/31/2014

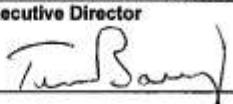
Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2012
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 12 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2012

Type of Grant

x Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 3)
Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	136,525	613,287	0	
20	Amount of Annual Grant:: (sum of lines 2-19)	7,666,096	7,666,096	2,514,237	981,023
21	Amount of line 20 Related to LBP Activities	150,000	150,000	150,000	
22	Amount of line 20 Related to Section 504 Activities	5,100	5,100	0	0
23	Amount of line 20 Related to Security - Soft Costs	694,290	47,500	47,500	47,500
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measu	16,447	20,000	16,988	16,988

Signature of Executive Director	Date	Signature of Public Housing Director	Date
			

[1] To be completed for the Performance and Evaluation Report.
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Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Beecher Terr KY 1-2	Admin Salaries	1410						
Beecher Terr KY 1-2	HALO Community Policing	1408	100%	24,040	23,750	23,750	23,750	
Beecher Terr KY 1-2	Eviction Prevention Program	1408	100%	22,330	22,330	22,330	6,900	
Beecher Terr KY 1-2	Annual AE Contract	1430	100%	29,310	29,310	29,310		
Beecher Terr KY 1-2	Tree Trimming	1450	100%	2,000	2,000			
Beecher Terr KY 1-2	Dwelling Equip - Ranges and Refrig	1465						
Beecher Terr KY 1-2	Handicapped and Wheelchair Ramps	1450	100%	5,100	5,100			
Parkway Pl KY 1-3	Admin Salaries	1410						
Parkway Pl KY 1-3	HALO Community Policing	1408	100%	25,800	23,750	23,750	23,750	
Parkway Pl KY 1-3	Eviction Prevention Program	1408	100%	16,170	16,170	16,170		
Parkway Pl KY 1-3	Annual AE Contract	1430	100%	30,561	30,561	30,561		
Parkway Pl KY 1-3	Tree Trimming	1450	100%	2,000	2,000			
Parkway Pl KY 1-3	Fire Damage Bldg 17	1460	10	100,000	100,000			
Parkway Pl KY 1-3	Dwelling Equip - Ranges and Refrig	1465						
Sheppard Square KY 1-4	Comprehensive Modernization	1499	100%	736,214	736,214	736,214		
Sheppard Square KY 1-4	HALO Community Policing	1408						
Sheppard Square KY 1-4	Eviction Prevention Program	1408						
Sheppard Square KY 1-4	Admin Salaries	1410						

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PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Dosker Manor Ky 1-12	Admin Salaries	1410						
Dosker Manor Ky 1-12	High Rise Security Guards	1408	100%	419,640	0			
Dosker Manor Ky 1-12	Eviction Prevention Program	1408	100%	1,540	1,540	1,540		
Dosker Manor Ky 1-12	Annual AE Contract	1430	100%	40,341	40,341	40341		
Dosker Manor Ky 1-12	Buss Duct/ Raceway Bldg B	1460	198	20,000	20,000			
Dosker Manor Ky 1-12	Dwelling Equip - Ranges and Refrig	1465						
Dosker Manor Ky 1-12	Resident Stipends - Security Activities - S	1408	75	21,750	0			
St. Catherine KY 1-13	Admin Salaries	1410						
St. Catherine KY 1-13	High Rise Security Guards	1408	100%	53,160				
St. Catherine KY 1-13	Eviction Prevention Program	1408	100%	770	770	770		
St. Catherine KY 1-13	Resident Stipends - Security Activities - S	1408	22	8,100	0			
Avenue Plaza KY 1-14	Admin Salaries	1410						
Avenue Plaza KY 1-14	High Rise Security Guards	1408	100%	50,880				
Avenue Plaza KY 1-14	Eviction Prevention Program	1408	100%	3,080	3,080	3,080		
Avenue Plaza KY 1-14	Annual AE Contract	1430	100%	14,988	14,988	14,988		
Avenue Plaza KY 1-14	Dwelling Equip - Ranges and Refrig	1465						
Avenue Plaza KY 1-14	Resident Stipends - Security Activities	1408	26	11,300	0			
Avenue Plaza KY 1-14	Window Replacement and PTAC Units	1460	100%	16,447	20,000	16,988	16,988	
Avenue Plaza KY 1-14	Paint and Drywall Repair - 16 Floors	1460	0%	0	0			
Avenue Plaza KY 1-14	Elevator Lobby / Paint / Drywall	1460	100%	131,725	188,188	2,253	2,253	

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PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Scattered Sites KY 1-17	Admin Salaries	1410						
Scattered Sites KY 1-17	Annual AE Contract	1430	100%	7,978	7,978	7,978		
Scattered Sites KY 1-17	Eviction Prevention Program	1408	100%	3,850	3,850	3,850		
Scattered Sites KY 1-17	Tree Trimming	1450	100%	2,000	2,000			
Scattered Sites KY 1-17	Dwelling Equip - Ranges and Refrig	1465						
Scattered Sites KY 1-34	Admin Salaries	1410						
Scattered Sites KY 1-34	Annual AE Contract	1430	100%	13,745	13,745	13,745		
Scattered Sites KY 1-34	St Martins Basement Upgrades	1460	26	88,000	103,618	31,941	31,941	
Scattered Sites KY 1-34	Dwelling Equip - Ranges and Refrig	1465						
Scattered Sites KY 1-34	Friary Comprehensive Modernization	1460	24	2,087,054	2,281,448			
Scattered Sites KY 1-34	Roof Replacement - Six Mi,Landside,orm	1460						
Scattered Sites KY 1-34	Coral Avenue Rehab	1460	2	60,000	60,000			
Scattered Sites KY 1-34	Noltelmeyer Fire Damage	1460	4	100,000	0			
Scattered Sites KY 1-34	St Martins Condensor Platform	1460						
Lourdes Hall KY 1-18	Admin Salaries	1410						
Lourdes Hall KY 1-18	Dwelling Equip - Ranges and Refrig	1465						
Lourdes Hall KY 1-18	Resident Stipends	1408	20	17,300	0			
Lourdes Hall KY 1-18	High Rise Security Guards	1408	100%	62,320				
Lourdes Hall KY 1-18	Eviction Prevention Program	1408	100%	6,160	6,160	6,160		
Lourdes Hall KY 1-18	Washing Machines for Laundry Mats	1475	100%	5,400	5,400			
Bishop Lane KY 1-40	Annual AE Contract	1430	100%	13,077	13,077	13,077		

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PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Park DuValle	Phase II Mixed Fin Cap Contribution	1460	0					
Park DuValle	Phase III Mixed Fin Cap Contribution	1460	100%	41,527	41,527	41,527	41,527	
Park DuValle	Phase IV Mixed Fin Cap Contribution	1460	100%	67,304	67,304	67,304	67,304	
Administration	Environmental Contract	1430	100%	300,000	300,000	300,000		
Administration	Annual Asbestos/Lead Removal	1460	100%	300,000	300,000	300,000		
Administration	Transfer	1410	100%	766,610	766,610	766,610	766,610	
Administration	Funding Operation	1406	100%	1,800,000	1,800,000			
Administration	Contingency	1502		136,525	613,287			
				7,666,096	7,666,096	2,514,237	981,023	

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Expires 4/30/2011

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 12 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2012

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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Annual Statement/Performance and Evalutation Report

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Annual Statement/Performance and Evaluation Report
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Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2013
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 13 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2013

Type of Grant
x **Original Annual Statement** **Reserve for Disasters/Emergencies** **Revised Annual Statement (revision no:)**
Performance and Evaluation Report for Period Ending: **Final Performance and Evaluation Report**

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)[3]	1,620,000	1,620,000	0	0
3	1408 Mangsgment Improvements	53,900	53,900	0	0
4	1410 Administration (may not exceed 10% of line 21)	741,681	741,681	0	0
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	450,000	450,000	0	0
8	1440 Site Acquisition				
9	1450 Site Improvement	90,000	90,000	0	0
10	1460 Dwelling Structures	1,345,290	1,345,290	0	0
11	1465.1 Dwelling Equipment-Nonexpendable	218,000	218,000	0	0
12	1470 Non-dwelling Structures	184,130	184,130	0	0
13	1475 Non-dwelling Equipment	24,200	24,200	0	0
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities [4]	2,579,054	2,579,054	0	0

[1] To be completed for the Performance and Evaluation Report.
[2] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[3] PHAs with under 250 units in management may use 100% of CFP Grants for operations.
[4] RHF funds shall be included here.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
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U.S. Department of Housing and Urban Development
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Part I: Summary

PHA Name:	Grant Type and Number	FFY of Grant: 2013
Louisville Metro Housing Auth	Capital Fund Program Grant No: KY 36 P 001 501 13 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2013

Type of Grant

x Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no:)
Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost [1]	
		Original	Revised [2]	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	110,550	110,550	0	
20	Amount of Annual Grant:: (sum of lines 2-19)	7,416,805	7,416,805	-	-
21	Amount of line 20 Related to LBP Activities	150,000	150,000		
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs			-	-
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Meas	0	0	0	0

Signature of Executive Director	Date	Signature of Public Housing Director	Date

[1] To be completed for the Performance and Evaluation Report.
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Part II: Supporting Pages

PHA Name: Louisville Metro Housing Authority	**Grant Type and Number** Capital Fund Program Grant No: KY 36 P 001 501 13 CFFP (Yes/No): N Replacement Housing Factor Grant No:	**Federal FFY of Grant:** 2013

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Beecher Terr KY 1-2	Eviction Prevention Program	1408	100%	22,330	22,330			
Beecher Terr KY 1-2	Annual AE Contract	1430	100%	29,310	29,310			
Beecher Terr KY 1-2	Tree Trimming	1450	100%	30,006	30,006			
Bsecher Terr KY 1-2	Dwelling Equip - Ranges and Refrigerator	1465	100%	42,597	42,597			
Beecher Terr KY 1-2	Roof Repairs	1460	100%	175,000	175,000			
Beecher Terr KY 1-2	Baxter Center Renovation	1470	100%	105,371	105,371			
Parkway Pl KY 1-3	Eviction Prevention Program	1408	100%	16,170	16,170			
Parkway Pl KY 1-3	Annual AE Contract	1430	100%	30,561	30,561			
Parkway Pl KY 1-3	Tree Trimming	1450	100%	29,997	29,997			
Parkway Pl KY 1-3	Daycare Exterior	1470	100%	25,000	25,000			
Parkway Pl KY 1-3	Dwelling Equip - Ranges and Refrigerator	1465	100%	44,416	44,416			
Parkway Pl KY 1-3	Daycare Water Damage	1470	100%	22,386	22,386			
Parkway Pl KY 1-3	Gym / Community Center	1470	100%	31,373	31,373			
Sheppard Square KY 1-4	Comprehensive Modernization	1499	100%	2,579,054	2,579,054			

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[2] To be completed for the Performance and Evaluation Report.

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PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 13 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2013

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Dosker Manor Ky 1-12	Eviction Prevention Program	1408	100%	1,540	1,540			
Dosker Manor Ky 1-12	Annual AE Contract	1430	100%	40,341	40,341			
Dosker Manor Ky 1-12	Buss Duct/ Raceway Bldg B	1460	198	32,275	32,275			
Dosker Manor Ky 1-12	Dwelling Equip - Ranges and Refrigerators	1465	100%	58,629	58,629			
				0	0			
St. Catherine KY 1-13	Eviction Prevention Program	1408	100%	770	770			
				0	0			
Avenue Plaza KY 1-14	Eviction Prevention Program	1408	100%	3,080	3,080			
Avenue Plaza KY 1-14	Annual AE Contract	1430	100%	14,988	14,988			
Avenue Plaza KY 1-14	Dwelling Equip - Ranges and Refrigerators	1465.1	100%	21,782	21,782			
				0	0			

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 13 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2013

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Scattered Sites KY 1-17	Annual AE Contract	1430	100%	7,978	7,978			
Scattered Sites KY 1-17	Eviction Prevention Program	1408	100%	3,850	3,850			
Scattered Sites KY 1-17	Tree Trimming	1450	100%	29,997	29,997			
Scattered Sites KY 1-17	Dwelling Equip - Ranges and Refrigerator	1465.1	100%	11,595	11,595			
Scattered Sites KY 1-17	Non Dwelling Equip - Grounds equip	1475	100%	18,800	18,800			
Scattered Sites KY 1-34	Annual AE Contract	1430	100%	13,745	13,745			
Scattered Sites KY 1-34	169 Coral Avenue	1460	1	60,000	60,000			
Scattered Sites KY 1-34	Dwelling Equip - Ranges and Refrigerator	1465.1	100%	19,976	19,976			
Scattered Sites KY 1-34	Friary Comprehensive Modernization	1460	24	75,725	75,725			
Scattered Sites KY 1-34	Roof Replacement - SixMi,Landside,Orms	1460	29	167,920	167,920			
Scattered Sites KY 1-34	601 W Breckinridge Renovations	1460	2	50,000	50,000			
Scattered Sites KY 1-34	Noltemyer Fire Damage	1460	3	100,000	100,000			
Lourdes Hall KY 1-18	Dwelling Equip - Ranges and Refrigerator	1465.1	100%	19,005	19,005			
				0	0			
Lourdes Hall KY 1-18	Washing Machines for Laundry Mats	1475	100%	5,400	5,400			
Lourdes Hall KY 1-18	Eviction Prevention Program	1408	100%	6,160	6,160			
Lourdes Hall KY 1-18	Replace Domestic Hot Water System	1460	100%	36,000	36,000			

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report.

form HUD-50075.1 (4/2008)

Annual Statement/Performance and Evalutation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2014

Part II: Supporting Pages

PHA Name:	Grant Type and Number	Federal FFY of Grant:
Louisville Metro Housing Authority	Capital Fund Program Grant No: KY 36 P 001 501 13 CFFP (Yes/No): N Replacement Housing Factor Grant No:	2013

Development Number Name/Pha Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised [1]	Funds Obligated [2]	Funds Expended [2]	
Bishop Lane KY 1-40	Annual AE Contract	1430	100%	13,077	13,077			
Bishop Lane KY 1-40	Replace Fire Control Panel	1460	100%	100,000	100,000			
Park DuValle	Phase II Mixed Fin Cap Contribution	1460	100%	136,271	136,271			
Park DuValle	Phase III Mixed Fin Cap Contribution	1460	100%	42,773	42,773			
Park DuValle	Phase IV Mixed Fin Cap Contribution	1460	100%	69,326	69,326			
Administration	Environmental Contract	1430	100%	300,000	300,000			
Administration	Annual Asbestos/Lead Removal	1460	100%	300,000	300,000			
Administration	Transfer	1410	100%	741,681	741,681			
Administration	Funding Operation	1406	100%	1,620,000	1,620,000			
Administration	Contingency	1502		110,550	110,550			
				7,416,805	7,416,805	0	0	

[1] To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
[2] To be completed for the Performance and Evaluation Report. 0

form HUD-50075.1 (4/2008)

Appendix A

Amended Definition of Substantial Deviation and Significant Amendment/Modification to the Annual Moving To Work (MTW) Plan

HUD requires PHAs to re-propose activities that require "significant changes." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed OR when a PHA fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (e.g. changing the calculation of rent). In these cases, the activity must undergo a new public process. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.

Substantial deviations or significant amendment/modifications are also defined locally as discretionary changes in the plans or policies of the Louisville Metro Housing Authority that fundamentally change the mission, goals, objectives or plans of the Agency's Annual Moving To Work (MTW) Plan and which require formal approval of the Board of Directors

LMHA will consider the following to be substantial deviations and significant amendments/modifications:

- Significant changes to an MTW Activity outside the scope of the Agency's HUD-Approved MTW Plan. HUD requires PHAs to re-propose activities that require "significant changes." A "significant change" occurs when the nature of the activity has changed such that an additional MTW authorization is needed OR when a PHA fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents (e.g. changing the calculation of rent). In these cases, the activity must undergo a new public process. HUD reserves the right to determine on a case-by-case basis if the change made to an activity crosses this threshold and therefore requires the activity to be re-proposed.

- Changes to rent or admissions policies or organization of the waiting list;

- Changes to the Public Housing Admissions and Continued Occupancy Policy;

- Changes to the Section 8/Housing Choice Voucher Program Administrative Plan;

- Any single or cumulative annual change in the planned or actual use of federal funds as identified in the Plan of funds under the Capital Fund (including Replacement Housing Factor (RHF) funds) that exceeds 20% of the Agency's annual capital budget.

- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

- A substantial deviation does not include any changes in HUD rules and regulations which require or prohibit changes to activities listed herein.

Subsequent to changes to HUD regulations for the Capital Fund Program, LMHA is amending its definition of substantial deviation and significant amendment/modification to include:

- Proposed Capital Fund Financing, development, or mixed finance proposal.

Appendix B

Flat Rent Significant Amendment

The Louisville Metro Housing Authority hereby amends its flat rent policies to comply with the statutory changes contained within, Public Law 113-76, the Fiscal Year 2014 Appropriation Act.

The Louisville Metro Housing Authority will set the flat rental amount for each public housing unit that complies with the requirement that all flat rents be set at no less than 80 percent of the applicable Fair Market Rent (FMR) adjusted, if necessary, to account for reasonable utility costs. The new flat rental amount will apply to all new program admissions effective [Insert Date Here]. For current program participants that pay the flat rental amount, the new flat rental amount will be offered, as well as the income-based rental amount, at the next annual rental option.

The Louisville Metro Housing Authority will place a cap on any increase in a family's rental payment that exceeds 35 percent, and is a result of changes to the flat rental amount as follows:

- Multiply the existing flat rental payment by 1.35 and compare that to the updated flat rental amount;
- The PHA will present two rent options to the family as follows:
    - The lower of the product of the calculation and the updated flat rental amount; and
    - The income-based rent.

Appendix C

Choice Neighborhoods Planning Grant

In 2014 the Housing Authority intends to apply for a Choice Neighborhoods Planning Grant from HUD to support development of a comprehensive neighborhood transformation plan for the Russell Neighborhood and the Beecher Terrace public housing development. Other HUD subsidized housing in the neighborhood may be included as part of the application. If the grant is awarded, the effort will focus on directing resources to address the three core goals of HUD's Choice Neighborhood programs: housing, people, and neighborhoods. To achieve these goals, Russell Neighborhood residents and partners, including the Louisville Metro Housing Authority, who would be the lead applicant, would utilize up to $500,000 in financial support provided by the planning grant to develop a comprehensive neighborhood Transformation Plan. This Plan would serve as the guiding document for directing the transformation of the Russell neighborhood and distressed HUD subsidized housing within those boundaries, including the public housing at Beecher Terrace. The duration of the planning grant and deadline for completion of the Transformation Plan is up to two years. Implementation of the Plan would be contingent on procuring and raising adequate funding

Appendix D

Certifications and Disclosures

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Louisville Metro Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

PHA-Wide

Check here ☐ if there are workplaces on file that are not identified on the attached sheets.

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

Name of Authorized Official	Title
Tim Barry	Executive Director
Signature X	Date 8/21/14

form **HUD-50070** (3/98)
ref. Handbooks 7417.1. 7475.13. 7485.1 & .3

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

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Louisville Metro Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work (MTW) Demonstration Program

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

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

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

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

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

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

Name of Authorized Official	Title
Tim Barry	Executive Director
Signature	Date (mm/dd/yyyy)
	8/21/14

Previous edition is obsolete **form HUD 50071** (01/14)

ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Civil Rights Certification	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **Expires 08/30/2011**

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Louisville Metro Housing Authority	KY-01
PHA Name	PHA Number/HA Code

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

Name of Authorized Official Manfred Reid, Sr.	Title Chairman
Signature Manfred Reid	Date 8/21/14

form **HUD-50077-CR** (1/2009)

OMB Approval No. 2577-0226

OMB Approval No. 2506-0112 (Exp. 7/31/2012)

Certification of Consistency with the Consolidated Plan

U.S. Department of Housing and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Con solidated Plan.

(Type or clearly print the following information:)

Applicant Name: Louisville Metro Housing Authority

Project Name: Moving To Work (MTW) Annual Plan

Location of the Project: PHA-Wide

Name of the Federal Program to which the applicant is applying: Moving To Work (MTW) Demonstration Program

Name of Certifying Jurisdiction: Louisville Metro

Certifying Official of the Jurisdiction Name: Virginia Peck

Title: Director, Office of Housing and Community Development

Signature: Virginia Peck

Date: 8/21/14

form HUD-2991 (3/98)

Appendix E

Documentation of Public Process

INVITATION TO BID

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14 PUBLIC NOTICES

ELECTION OF TRUSTEES FOR FIRE PROTECTION DISTRICTS

THE FIRE PROTECTION DISTRICTS NAMED BELOW, IN CONJUNCTION WITH THE JEFFERSON COUNTY SUBURBAN FIRE SERVICE, HEREBY ADVERTISE, PURSUANT TO KRS 75.031, THAT ELECTIONS WILL BE CONDUCTED AT EACH OF THOSE FIRE PROTECTION DISTRICTS ON:

SATURDAY, JUNE 28, 2014 BETWEEN THE HOURS OF 11:00 A.M. AND 2:00 P.M.

THE ELECTIONS WILL BE CONDUCTED AT THE PRINCIPAL FIRE HOUSE OF EACH FIRE PROTECTION DISTRICT, WHICH IS LOCATED AT THE ADDRESS PROVIDED WITH THE NAME OF EACH FIRE PROTECTION DISTRICT.

ELECTION OF PROPERTY OWNER TRUSTEES

THE CANDIDATES FOR PROPERTY OWNER TRUSTEES FOR EACH OF THE FIRE PROTECTION DISTRICTS LISTED IMMEDIATELY BELOW ARE AS FOLLOWS:

ANCHORAGE FIRE PROTECTION DISTRICT - 1400 Evergreen Road Anchorage KY 40223
1). Neil MacDonald 2305 Cave Spring Place Anchorage KY 40223

EASTWOOD FIRE PROTECTION DISTRICT - 16010 Shelbyville Road Louisville KY 40245
1). Larry Roberts 2212 Flat Rock Road Louisville KY 40245

FAIRDALE FIRE PROTECTION DISTRICT - 10015 Mitchell Hill Road Fairdale KY 40118
1). Howard Lee Goldman 7707 Lesane Drive Louisville KY 40214
2). Edward DeWitt Hall 9814 Callie Drive Fairdale KY 40118
3). Kevin Leon Vittitow 2601 Fey Farm Drive Louisville KY 40272

FERN CREEK FIRE PROTECTION DISTRICT - 6200 Bardstown Road Louisville Ky. 40291
1). Douglas Sharp 7802 Brynwood Lane Louisville KY 40291

HARRODS CREEK FIRE PROTECTION DISTRICT - 8905 US Highway 42 Prospect KY 40059
1). Thomas Eckert 6910 Windham Parkway Prospect KY 40059

HIGHVIEW FIRE PROTECTION DISTRICT - 7308 Fegenbush Lane Louisville KY 40228
1). James Havel 6943 Norlynn Drive Louisville KY 40228

JEFFERSONTOWN FIRE PROTECTION DISTRICT - 10540 Watterson Trail Jeffersontown KY 40299
1). James L. Koestel Jr. 4215 Chenoweth Run Road Louisville KY 40299

LAKE DREAMLAND FIRE PROTECTION DISTRICT - 4603 Cane Run Road

PUBLIC HEARING
Louisville Metro Planning & Design
www.louisvilleky.gov/planningdesign. TDD 1-800-648-6056.

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14 PUBLIC NOTICES

LEGAL NOTICE
The Region 10 Workforce [illegible] tucky. The LLC members are as follows: Member, Raleigh Bruner, and Member, Andy Montgomery, both at the address above. Any person, association, corporation, or LLC who has an interest in the granting of a certificate in the territory sought to be served may comment on whether the applicant is fit, willing, and able properly to perform the service proposed by writing the Kentucky Transportation Cabinet, Office of Legal Services, 200 Mero Street, Frankfort, Kentucky 40622, within thirty (30) days of the date of legal publication.

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14 PUBLIC NOTICES

IN THE PROBATE COURT OF CHARLTON COUNTY STATE OF GEORGIA

IN RE: ESTATE OF MARISSA TYRRELL, DECEASED — **ESTATE NO. 2-1836**

NOTICE

To any heir whose current address is unknown, including but not limited to, James Adams:

Sherry Tyrrell has petitioned to be appointed Administrator of the estate of Marissa Tyrrell, deceased, of said County and has further moved this Court for a finding of abandonment on the part of James Adams. All interested parties are hereby notified to show cause why said petition and motion should not be granted. All objections to the motion and petition must be in writing, setting forth the grounds of any such objections, and must be filed with the court on or before June 10, 2014. All pleadings/objections must be signed under oath before a notary public or before a probate court clerk, and filing fees must be tendered with your pleadings/objections, unless you qualify to file as an indigent party. Contact probate court personnel at 1520 Third Street, Suite B, Folkston, Georgia, 31537, 912-427-5940 for the required amount of filing fees. A hearing will be scheduled at a later date to determine if the motion seeking a finding of abandonment and petition for letters of administration will be granted.

HON. ROBERT F. PHILLIPS
Judge, Charlton Co. Probate Court

By: Tammy Burch
Clerk/Deputy Clerk of Charlton Co. Probate Court
1520 Third Street, Suite B
Folkston, Georgia 31537

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14 PUBLIC NOTICES

Notice of Action on Title V Construction sections!

Louisville Metro Housing Authority (LMHA) Public Hearing to discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan, HUD Section 8 Rent Reform Study and Definition of Significant Amendment

There will be a public hearing on June 4, 2014 at 6:00 PM at Avenue Plaza, 420 S. 8th St, in the Community Room on the 2nd floor. LMHA's Draft 2014-2015 Annual MTW Plan, a HUD sponsored Section 8 Rent Reform Study and the Definition of Significant Amendment will be on the agenda. Information about the Study and the Definition is contained within the Draft Annual MTW Plan, which will be available for review from May 23, 2014 to June 23, 2014 on the LMHA website (www.lmha1.org, and at LMHA's Central Offices, 420 South 8th Street, or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502) 569-3420. TDD: (502) 587-0831.

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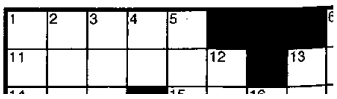
14 Chaseing game
15 Brass or bronze
17 Author — Rand
18 Dog days in Dijon
19 Thumbs through
20 Opposite of "haw"
21 Take a snooze
23 Briny expanse
24 Treetop refuge
25 Button on a remote
27 Most considerate
29 Gift of the garrulous?
31 Right this minute
32 Like coconut, maybe
35 Withhold, as permission
38 Skippers' OKs
39 Mountain pass
41 Tolstoy and Sayer
43 Diagnostic scanner, briefly
44 Arouses enthusiasm
46 Swiss cheese hole
47 Woosnam of golf
48 Big computer chip maker
49 Mother rabbit
50 Rathskeller mugs
52 — over (fainted)
54 Car with four doors



LOUISVILLE METRO HOUSING AUTHORITY

Draft 2014-2015 Annual Moving to Work Plan, The Housing Choice Voucher Rent Reform Study and Definition of Significant Amendment

Public Hearing

Wednesday, June 4th, 2014
6:00 p.m.

Avenue Plaza
420 S. 8th St, Louisville, Kentucky, 40203
2nd Floor, Community Room

Please join Louisville Metro Housing Authority (LMHA) staff at a public hearing to discuss the Draft 2014-2015 Annual Moving to Work (MTW) Plan, a HUD-sponsored Housing Choice Voucher (HCV) Rent Reform Study and the Definition of Significant Amendment to the Annual Plan. The hearing will take place at 6:00 p.m. on June 4th, 2014 at Avenue Plaza in the Community Room on the 2nd floor. Information about the HCV Rent Reform Study and the Definition is included in the Draft 2014-2015 Annual MTW Plan that will be available for review from May 23, 2014 to June 23, 2014 on LMHA's website (www.lmha1.org) or by mail as requested upon calling (502) 569-3420 or in person at the following locations:

LMHA's Central Offices
420 S. 8th St
Louisville, KY 40203

LMHA's Section 8 Office
801 Vine St
Louisville, KY 40204

Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203
Phone: (502)569-3400
Fax: (502)569-3459

Accommodations for disabled or non-English speaking persons will be made available upon advance request.

For Further Information
Or to Arrange Transportation
Call (502)569-3420
TTY/TDD (502) 587-0831

Louisville Metro Housing Authority

Public Hearing

Avenue Plaza, 2nd Floor Community Room
420 S. 8th St, Louisville, Kentucky, 40203

Wednesday, June 4th, 2014
6:00 p.m.

Agenda

- Welcome and Introduction
- Goals of the Moving to Work (MTW) Program
    - Increase Housing Choices for Low-Income Families
    - Incentivize Families to Become Self-Sufficient
    - Achieve More Effective Expenditure of Federal Funds
- FY 2015 Annual MTW Plan
- HUD/MDRC Housing Choice Voucher Rent Reform Study
- Public comments
- Adjournment

Proceedings will be recorded on tape and a summary of comments and responses will be forwarded to HUD for review.

Interested in Speaking?

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; and Mandatory Changes to Flat Rent Requirements
Avenue Plaza, 2nd Floor Community Room
420 South 8th Street, Louisville, Kentucky, 40203
Wednesday, June 4, 2014
6:00 p.m.

Please indicate (or check) here if you would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings.

Name	Organization/ Development	Address/Phone Number	Email Address	Yes/No
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400		Yes
1. Cathy Hurto	MHK			
2. Elretha Gardner	Avenue Plaza	4005 4th St 509		
3. Virgie Esters	Avenue Plaza	269-4724		
4. Lidice Hathaway	Parkhill	1725 H Patton Ct 502-500-1162		
5. Shirley Lewis	Beecher Terrace	422 South 12 632-1269		
6. Amanda Stahl		606 584-8585		
7. FADUMA ABDIKHADIJA				
8. Yusuf Ambure		1620 Omar Ct Louisville		
9. Dellia Dixon	Parkway Place	502 807-3435		
10. Teresa Daniel				
11.				
12.				
13.				

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; and Mandatory Changes to Flat Rent Requirements
Avenue Plaza, 2nd Floor Community Room
420 South 8th Street, Louisville, Kentucky, 40203
Wednesday, June 4, 2014
6:00 p.m.

Indicate here if you would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings?

Name	Organization/ Development	Address/Phone Number	Email Address	Yes/No
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400		Yes
1. Paula Leslie	400 S 8th #1511			
2. Cleopatra Buckner			GiTranquility@gmail.com	yes
3. Erica Smith	1713C Patton Ct #43	298-4267		yes
4. Karen Truitt	412 Reservoir			
5. Shirley Solomon	418 S 12th 40203	269-9512		
6. Michael Hodish	4113 Bishop Ln	4113 Bishop Ln #608		✓
7. FADUMA ABDI				✓
8. Kaltuma Hussein	452 Wilberforce Ct 40203			yes
9. Melvina Hughes	1625C Patton Ct Apt 35	618-2220		
10. Gwyn Horton	LEGAL AID SOCIETY	416 W. Muhammad Ali Ste 300 Lou. KY 40202	ghorton@laslou.org	YES
11.				
12.				
13.				

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; and Mandatory Changes to Flat Rent Requirements
Avenue Plaza, 2nd Floor Community Room
420 South 8th Street, Louisville, Kentucky, 40203
Wednesday, June 4, 2014
6:00 p.m.

Please indicate (or check) here if you would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings.

Name	Organization/ Development	Address/Phone Number	Email Address	Yes/No
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400		Yes
1. Victoria Turner	1801			✓
2. Bruce Sherrod	"		bez.sherrod@gmail.com	Y
3. Carolyn Phillips				
4. John Mitchell		413-K ALI #1022A		
5. Charletta Leslie	Beechers	410 South 10th St #10	charlettaleslie	✓
6. Patrick Stokes	Stokes Apartments	589-6704		
7. Sarah Galloway	—	468-0586	sarah.jane.galloway@gmail.com	✓
8. Susie A Hamilton	1501	400 So 8 St		
9. [illegible]	550 [illegible]	550 South 8th St	[illegible]	✓
10. Chrlisa Yelverton	Parkway Place	1220 N Moore Ct #1098 Louisville 40210 502-510-5603		
11. Amelita Yelverton	Parkway Place	1631-H Patton Ct #H 502-436-3209		
12. Taralyn Smith	Parkway Place	1201-K Brashear Dr #12		
13. ~~[illegible] English~~	~~[illegible]~~ MHA	~~502-614-2348~~ 400 So 8th St 1001		

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	-	Yes
1. Judy Heard		400 So 8th #1714	Jdyhrd@yahoo.com	yes
2. Christopher Gray				
3. Norris S Haley		401 S 8th St. 806		yes
4. Phyllis Taylor		400 So. 8th St. #1215		
5. Sarah Lasher	LMHA			
6. Shelma Martin	LMHA	400 S. 8th # 1409		
7. Della Dixon	Resident Parkway Place	1715 Harrod Ct - 48K	lockhartdis@yahoo	yes
8. Vicki Taylor	LMHA	400 S. 8th Apt 801		yes
9. Marlene Yates		423 S. 10th		✓
10. Antonetta Taylor		1220 Moore Ct #8m		
11. Peggy Williamson		1220 Moore Ct #8D		
12. Phyllis Lacy		1220A Moore Ct #8		
13. Mohamed Ambre	LMHA			

Louisville Metro Housing Authority
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Name	Organization/ Development	Address/Phone Number	Email Address	Yes/No
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400		Yes
1. LISA OSANKA	LMHA	"	Osanka@lmha1.org	Y
2. Deborah Gilbert	LMHA	"	gilbert@lmha1.org	
3. Tracy Holmes Bell	LMHA	"	tbell@lmha1.org	
4. Cathy Hinkle	MHC	P.O. Box 4533 40204	cathy@metroopportunities.org	Yes
5. Rhonda Harris	LMHA	1731 P Parkway 4th Sq	[redacted]	
6. J Moore		1002 Fisk ct		
7. A Brandon	LMHA	1015 Vine street		
8. Rose Walton	550 Apartment 516	502 587 6021		
9. [illegible]	LMHA			
10. [illegible]	LMHA	" "		
11. Theresa Lamar	LMHA	550 Apt		
12. Anthony Fray	LMHA	Packhill 1-K 15/16 12th		
13. Lynn McCallie	LMHA			

Public Hearing
June 4, 2014
Avenue Plaza, 2nd Fl. Community Room
420 S. 8th St., Louisville, KY
6:00 p.m.

Tim Barry welcomed the attendees. The hearing tonight is to talk about a number of important issues, beginning with our MTW demonstration program and what we'd rather call it is the Annual Plan, noting we do this every year, and to also talk about the Housing Choice Voucher Rent Reform Study, flat rent, and, at that point, after we've gone through the agenda items we will entertain questions and comments from the audience. He said if you would, as is our custom, allow us to get through the agenda and have some discussion about the various items listed and then we will turn it over to the audience for questions, suggestions, comments and will stay here for as long as you would like to talk.

The first order of business is to ask Mohamad to come up to see if there is anyone in the audience who needs translation services. Barry said that Mohamad is a member of our staff as well as others in attendance – Nate Northington, Juan Hunter, Lisa Osanka, Deborah Gilbert, Lynn McCallie, Tracy Holmes-Bell, Sarah Laster, and board member Thelma Martin.

Sarah Laster, LMHA's MTW Program Coordinator, welcomed everyone. Every year the Housing Authority is required to put together an annual plan that details the activities, central policy changes, capital improvement that it intends to make in the next 12 months or, to be more exact, the period of time is July 1, 2014 through June 30, 2015. As part of that process we have a public comment period and public hearing. She said it is a very comprehensive document but she will go through the highlights of the Plan. She said the MTW program was established by HUD in 1999 and it provides the housing authorities that participate in the program with some regulatory flexibility. Whenever they use this authority though, they have to make sure that they are meeting one of the three MTW objectives. Those objectives are to reduce cost s and achieve greater cost effectiveness in federal expenditures; give incentives to residents, especially families with children to obtain employment and become economically self-sufficient; and increase housing choices for low-income families. Also, when the housing authority uses its MTW authority, as we call it, it has to describe how it's going to use that authority and also document the outcome of whatever those activities may include in its annual report. That document is typically published in the Fall.

Laster said one of the sections of the Annual Plan is about the housing authority's general operating information as documented in the table on housing stock. The Housing Authority plans to increase the number of units in its housing stock by 135 unit this year and that's primarily in the public housing program. The Housing Authority anticipates removing one unit from its housing stock and that's the unit that is now within 100-year flood plain; those boundaries were recently redefined and now that unit maybe acquired by MSD. Other changes that may occur during the year to the housing authority's housing stock have more to do with units that are currently being held vacant and may be redeveloped or rehabilitated in the coming the year. The Friary, a property in downtown Louisville, has been vacant now for some time.

LMHA intends to explore options for redeveloping that within the coming year; options may include mixed finance or use of its MTW use-of-funds authority. What that means is that the Housing Authority can use some of its money that it's provided for Section 8 and Section 9 activities to rehab that building. The Housing Authority also intends to acquire four units at Wilart Arms, that's a mixed-finance project of the Kentucky Housing Corporation (KHC), LMHA and the Housing Partnership, Inc. That is a 66-unit property located in Shively and there are four units there that the Housing Authority would like to continue to subsidize through the public housing program. Also, the Housing Authority intends to acquire four units at the Stoddard Johnson Family Scholar House site.

Laster then talked about the Housing Authority's plan to lease public housing units and Section 8 vouchers in the coming year. The Housing Authority anticipates that on June 30, 2015, it will be serving approximately 3800 families in the public housing program and just over 9192 families in the Section 8 housing choice voucher program. The Housing Authority may also be serving two additional families through a partnership it has with Frazier Rehab. Two of the units at the Liberty Green Community Center are now subleased to Frazier Rehab and some of their patients with severe spinal cord injuries are helped there.

Laster went over the waitlist information. The Housing Authority maintains a single waitlist for its Housing Choice Voucher Program and that waitlist currently has 17,428 families on it. The Housing Authority has multiple waitlists for its public housing stock, the largest being a waitlist for its owned and managed sites which currently includes just over 3,578 families. The Liberty Green waiting list, that's a mixed-finance site, has 666 families on it. The Park DuValle waitlist has 2,759 families on it. The Oaks waitlist has 550 families on it. The Family Scholar House is a single waitlist for all public housing units included at Family Scholar House sites, which includes Downtown Scholar House and shortly Stoddard Johnson Scholar House as well, and has 881 families on it. New this year will be a site-based waiting list at Wilart Arms. The Housing Authority also maintains an internal waitlist for its scattered sites and that list currently has 181 families on it.

Section 3 of the Annual Plan is about proposed MTW activities. There are two brand new MTW activities this year. The first is a special referral program with Seven Counties, Inc. and this is specifically with their assertive community treatment team. The assertive community treatment team is an evidence-space practice approved by the Substance Abuse & Mental Health Services and it's designed to engage persons with severe mental illness whose needs are not yet met by traditional outpatient services. LMHA will allocate 50 vouchers to this special referral program and these purchase events will be referred to the Housing Authority for a voucher directly from Seven Counties. The other brand new initiative this year is the Housing Choice Voucher Rent Reform Study which we will talk about separately because it is such a comprehensive activity.

There are also included within Section 2 activities that have been discussed at previous public hearings. The first is a sublease agreement with YouthBuild Louisville, that would be an agreement to allow YouthBuild Louisville to public housing units to its low income participants. The second is the conversion of LMHA's Family Scholar House and possibly other special referral programs where the voucher is largely based at the site or tied to the unit in some way to a use of a local non-traditional voucher activity. A local non-traditional housing activity might

be a situation where the Housing Authority is block-granting funds to the organization rather than providing subsidies through a tenant-based voucher.

Section 4 of the Plan is the approved MTW activity. These are activities that the Housing Authority was previously granted HUD approval to implement. For the most part there are no substantial changes to these activities. There is one change, however, to the way that the Family Scholar House special referral programs operate. Some of you might know that there is a time limit on the voucher after a participant has graduated from the program. We are going to provide relief from that time limit for a client to enter a housing choice voucher homeownership program.

Section 5 - Sources and Uses of Funds. There is a detailed budget contained within the Annual Plan. And, Laster said, she would like to briefly run over what pertains to us to the MTW program and that is the use of MTW's single-fund flexibility. What that means is the Housing Authority under the Moving to Work agreement is allowed to combine its public housing, housing choice voucher and capital fund and, so, LMHA has several activities that are outlined within the Plan that utilize this flexibility. In the past and so the Housing Authority has reserved the Authority to use such funds for its multi-cultural family assistance program. The Housing Authority is also proposing to transfer funds from its Section 8 program to public housing for continued operations of public housing units. And, although in the past, the Housing Authority has transferred some capital funds program money also into public housing, it doesn't anticipate doing that this year but would like to reserve the authority of flexibility to do that if that becomes necessary.

Also included within this year's Annual Plan is an amended definition of Substantial Deviation and Significant Amendment or Modification to the Annual Plan. Laster said she thinks it's important enough that these are any type of changes that the Housing Authority intends to make it would have to go back out for public comment and have another public hearing and get Board approval. Previously these changes were defined as significant changes to an MTW activity outside the scope of the approved MTW Plan. Any changes to rent or admissions policies or organization of the waiting list changes to the public housing admissions and continued occupancy policy, changes to the Section 8 or the housing choice voucher program or administrative plan, any single or cumulative annual change in the plan are actually federal fund as identified in the plan of funds under the capital fund that exceeds 20% of the agency's annual capital budget. Any change with regard to demolition or disposition, designation of homeownership programs to conversion activity and however does not include any changes in HUD rules and regulations which require or prohibit certain activity. This year so that the newly amended definition also includes proposed demolition, disposition, capital fund financing changes, developed or any type of mixed finance proposal.

The Housing Authority is required to comply with the Congressional mandate to modify the flat rent policy and so within the Annual Plan there is the flat rent significant amendment that describes the law and that is that the Housing Authority will set the flat rental amount for each public housing unit that complies with the requirement that all flat rent be set at no less than 80% of the applicable fair market rent adjusted if necessary to account for reasonably utility cost. This policy also requires that if there are any households that pay the existing flat rent to local

flat rents that their payment would not increase by more than 35% each year. We will talk more about the flat rent policy after we take a look at the housing choice voucher rent reform study.

Next presenter was Deborah Gilbert, Assistant Director of Leased Housing at LMHA. LMHA has been asked by HUD to participate in this rent reform study and it's intended to test and evaluate the potential of an alternative rent policy to promote greater self-sufficiency and reduce costs through operational efficiency. The rent reform study applies to tenant-based housing choice voucher program only so it's only to Section 8 participants. The proposed alternative rent policy includes the following key features: a change in percent of income that the vouchers holders pay towards their share from the 30% of adjusted income to a maximum of 28% of gross income. We will be eliminating the deductions and allowances under the rent reform study. There will also be a minimum rent paid directly to the landlords of $100 per month. This is to insure that most tenants contribute something to the shelter cost. We will also be ignoring a household asset income when the total asset is below $25,000. The recertification period under the rent reform study will be three years and this is to encourage you to work so your rent will not be increased based off of your working income for three years. Also, we will have a simplified policy for utilities, this is to reduce calculation errors and cost. We also would have a hardship policy to protect tenants with exceptional circumstances from harm, such as excessive rent burden. We are one of four agencies that are participating in this study. The other agencies are San Antonio Housing Authority, Housing Authority of the District of Columbia, and Lexington. The Louisville alternative rent policy would apply only to a portion of the participants. It will exclude elderly and disabled households, households currently in the family self-sufficiency program, as well as households of the VASH program. It will also exclude special programs such as certificate programs and special referrals from partners such as Family Scholar House and the Center for Women and Families. The study is going to consist of 2,000 families. We are going to have 1,000 of a control group and 1,000 of the study group. Households in the control group will continue to have their rent calculated according to our current rent policies. Households will not have the option to pick which group they want to be in and they will also not have the option to opt out of this study. As part of the study, HUD has contracted with MDRC Urban Institute and Bronner Group and others to help develop and implement the rent reform policy. As stated earlier, the full description of the study is in our 2014-2015 MTW Plan.

Next presenter was Nate Northington, Regional Director of LMHA. Talked about mandatory public housing flat rent requirements. The Housing Authority currently has what we call flat rents and those are rents that our residents may pay in lieu of paying an income-based rent. In other words, depending on what your income may be, if your income that you have is at a level that is more than what our flat rent is you have to pay the flat rent not the income-based. An example of that, a flat rent for a one-bedroom apartment used to be $278 but that was changed several months ago and we had a public hearing at that time and we changed those flat rents to the current amount effective July 1, 2014 which is $411. But, remember that this is a mandate by HUD. One good thing is that we cannot raise them all up to a high amount, going to 35% for a year. Until we get to that 80% of the fair-market rent so in other words in some cases it's going to take up to two years to reach the new 80% level. Another example for instance are three-bedroom apartments, it is going to take two years to reach the 80% and at that time the

rents that we had already set actually at the 80% is going to be lower than what those rents are that we had set previously a couple months ago.

Laster said we are trying to update our lists of folks who are contacted when we have updates/policy changes so if you have email and would like to receive an email regarding any policy updates/changes to the Authority's Annual Plan please check the box next to your name on the sign-in sheet.

Laster then opened the meeting for questions and comments, noting we have a speaker list for this evening asking each person who comes up to speak to speak their name into the microphone as the comments are recorded and we do respond. If you represent an organization also state the name of that organization.

First on the list is Cathy Hinko from the Metropolitan Housing Coalition.

Hinko said first of all she wants you to know that you have power and you can comment and so much of this is a surprise to you. You not only can comment tonight but the Board of the Louisville Metro Housing Authority votes on these changes and you can go to their meetings. As an example of how confused and almost deliberately confusing this process is, no one has told you that the regular meeting of the June Louisville Metro Housing Authority Board has been changed, saying she guesses that is a little secret that they were planning to make sure you did not know. Although they normally would meet on June 17, they're going to postpone it to June 24, asking Barry if that's still the plan and he responded correct. Hinko said she believes this is more an example of how much confusion there is around this rather than really ill-intent but there has not been a special effort to make these things known to you. But, she said, she encourages you to comment today because these things go in the record as well as attending the Louisville Metro Housing Authority Board which will be at 3:30 on June 24 in the regular offices in this building. One thing she said she has commented on many years in a row is how the moving to work, this special designation, rob Section 8 of millions of dollars that could help families on the waiting list. She said she heard all of you gap when you were told there are 18,000 households on the waiting list for Section 8. Yet the Housing Authority is moving $7.6 million out of helping those 18,000 families get rent assistance and putting it into administration. She says that any organization that needs to deprive children of stable housing in order to meet payroll should be audited by our State Auditor. In addition, they want the power to say they can change this budget by 20% without having to have it published and commented on. She finds this financially irresponsible, it's behind the scenes that kind of power is necessary to be able to administer this agency. Hinko said she made these same comments only a couple of months ago when they revised their last Moving to Work plan. She said she would just like to see if any of you agree with me that any agency that needs to move money around like that without public input should be audited – raise your hand if you think that. Please let the record reflect that at least two-thirds of the people in the room raised their hand. Now, she said, she knows that many of you are affected by and will want to comment on flat rent and, she said, she will leave that to you because you are probably the best people to speak on how that will change your life. She said she will really focus on this study which was hidden on page 77 of the published plan as if, again, it's a confusion we really didn't want people to understand what was happening to the Section 8 program. The Housing Authority for over a year has been planning this study. How

many of you knew about this before tonight? But this is an experiment, they made it sound neutral, this is an experiment on African-American mothers and African-American children. And, there are many people who are professional researchers who feel that any study where you do not have the option to say no is unethical. And, she said, she says this about race because in the plan itself we know that 71% of the households on Section 8 are headed by someone who is African-American. And, they are taking out anyone who is elderly or disabled or in one of the special programs, which leaves us with families with children and increases the racial composition even beyond the 71%. And, so who are we aiming at, African-American mothers and their children and the premise is that those women are not working by choice and maybe we can force them into jobs that may or may not exist. There is no research that suggests one number over another number and, she said, she actually got to ask the researcher why this number, there was no reason. So, she can only believe that the main reason is that they don't think much of these mothers and children and think that they deserve to be punished somehow. Now the Housing Authority here does have a program that helps people not have to pay that minimum rent and they intend to keep that program but it only applies in a limited number of cases. So, Hinko said she would like to do away with minimum rent and if you had to have it, just keep it at $50 or $75 or well any number because her number has as much legitimacy, as much authority, as the researcher's number. Now there is a long list of people that HUD consulted in devising this plan, guess who is not included in in that list – anybody that is an advocate for tenants. Hinko said she opposes this study at this time unless we get some of these changes in there. The last part is you heard Deborah Gilbert talk about a simplified utility allowance, guess how much they wrote about what that would be – nothing. She said she considers how much you get in utility allowance, the calculation, to be a really critical part of knowing how this study will work but they're only explanation is trust me. So, she urges the Board of the Louisville Metro Housing Authority to say let's put on the brake, let's figure this out and let's see what negotiations we can have if this study is to take place. Hinko said this concludes her remarks.

Next person is Aretha Gardner, she declined.

Virgie Esters would you like to speak? If not, that's okay too. Laster said she apologizes that the sheet we made looks an awful lot like the sign-in sheet so if you mistakenly signed it, just pass, that's okay.

Laster went through the list and said if you'd like to speak just say so. Nedief Hathaway would you like to speak. She said no. Shirley Lewis, no.

Amanda Stall represents Standing up for Reasonable Justice which is a group that focuses on reasonable justice in Louisville. She wants to speak a little bit about what Cathy was saying about the study and she is concerned about it. Stall said she is a social worker and she works with a lot of people who has hit hard times in the community but she also does research at the University of Louisville and so she has been approved to work with human subjects and to do research on different things and though this study that Cathy was talking about really concerns her because one of the things we have to make sure that all cities go through an institute over city boards and she is concerned that this city did not go through that process saying she didn't know if they did or not, but anyone should know that they are doing these studies as human subjects

and they should have the right to say they don't want to be involved. And she thinks that is the most important thing about understanding this process is they need to know that you shouldn't be forced to be a part of a study if you don't agree with what they are doing. And, another thing about this thing is, she said, she doesn't understand why they are saying people with disabilities or elderly people and it looks like to her that they are just focused on low income women and black women and that's completely wrong and inappropriate to do and people with disabilities should be able to be part of the study because they have the responsibility to work like every other person in Louisville, they should be expected to work just like people of color and any other person who is a qualified person to work. Those are just my concerns and this whole process and I thank you for listening to my concerns and I hope that everyone here knows that they need to speak up as well.

Fazuma would you like to speak? Mohamed Ambure interpreted for Fazuma. She has a concern about why Parkway never been given Section 8. Why Sheppard Square are getting Section 8 and why not Parkway? My income is only $420 and my monthly rent is $150, so how will I be affording my household if I only have $420 and I may have to pay $150 every month? And I tried my best to find a job and I am still looking but I have a problem on the daycare side because I cannot afford to pay daycare and to look at jobs at the same time so how can Housing Authority help me on that situation? Barry said we will talk to her after the meeting.

Next person is Ambure, no comment.

Mohamed interpreted for _____ saying she said our rent is going be on July 1 going to be $718 and there are eight persons in the household and no safe place in this Parkway and we've been accused several times and no safety there, no police helps people and how will I be able to pay $718 a month with no safe area? If they are going to give me a Section 8 unit I'll be able to pay $718 but Parkway project I will not be able to pay $718 so if I am going to pay $718 I can find a safe place to live.

Laster said next is Adelia Dixon and if there is anyone else who would like to make comments after Adelia, please feel free to raise your hand.

Dixon asked if we would have the opportunity to move?

_____ said she was a resident of Parkway Place and she noticed that this meeting was a good meeting and she is not downing the meeting or anything but the things that was on the paperwork/flyers that you all sent out, they were kind of misleading because they kind of made people feel like the schooling helped and the help with schooling and the help with rent would also apply for the people that were not on Section 8 but basically tonight all we have been talking about is the Section 8 people and there are people in Parkway Place, there are single mothers with children who would benefit from being able to attend school and to have help with their rent and probably get to the point to where they can move out and become productive citizens at another neighborhood. But, she said, she has a question with how are the people in housing benefitting or what's the benefit that you all have applied to the Section 8 people be able to help the people at Parkway Place. The focus should be on the incentives to make people want to do better to make them want to move. Now with the raising of the rent, that's going to cause a lot

of problems for a lot of people because a lot of people are on fixed income and she is one of those and even though Obamacare has come through there is still medications that has to be paid for that is not covered by Medicare nor is it covered by our Passport. There's still transportation issues of people trying to get back and forth to the doctor. There's still the problem of wanting to know about what can be done in our community to help the elderly and kids. We still have all those issues in front of us but yet still you all have an agenda that you all have to go by but we need for you all to come to our community, talk to some of the people in our community, listen to what they are saying and understand from their hearts because a lot of these people are talking from their heart. She said she talked to a lot of people every day at Parkway Place and their main concern is what is happening with the elderly and the children. We have elderly people that are getting mugged and this shouldn't be happening. We have children that are going around vandalizing stuff and that shouldn't be happening either. But, yet still, and she said she is sorry to say this but she got this from one of her police officer friends, Metro Housing is not giving them the backing that they need to where if they catch a child out doing something wrong where they can take them to the parents door, instead they have to stand there and listen to the children insult them as well as whoever they have called them for, that's something else that doesn't need to happen in our community. But the rents, a one-bedroom is going to be $411 at the flat rate. Okay, you do that then an elderly person that's living in that one-bedroom suppose their social security income is only $648 and out of the $411 their rent is going to come, the $411 that's their rent and that's going to come out of that, then they have whatever side medical bills they have to pay then they have the household things that need to be put in the house that can't be gotten with food stamps and half of the elderly people that are one food stamps they're only getting somewhere like maybe $20 to $15 in food stamps so they're not able to eat. She said she understands your all's plan and she understands because Louisville is trying to be a growing city, she understands all that, but once you forget about the people in the city what is the city because a lot of the stuff that is going on now is because people can't make it and because they can't make it they are doing stuff to try to make ends meet and that's causing a problem. So, what we need is for you all to just do a survey, not in the mail, and she would be one that is willing to go around and do that for you but do a survey and talk to these people, see what it is that is really hurting them, what's really bothering them because we've got so many diabetic elderly people at Parkway Place that it's pathetic and we need a program that can teach them and train them on what they need to do and it needs to be brought to Parkway Place not to Louisville Metro Parks but it needs to belong to Parkway Place, it needs to be something that we're doing for the people within our community just like within the other communities of how they've got things set up – we need that. And, for the elderly and the kids and the kids already have a hard enough time and then for this to be imposed more onto their parents no telling what's on _____ now. She would just appreciate if you all would take time out to get somebody to come through our neighborhoods and talk to our people and listen to them. This new flat rent thing is going to hurt a lot of people. Apologizes for taking up so much time and thanks everyone for listening.

Laster opened the floor for anyone else who has questions or comments.

Theresa Daniels and she wanted to expound on what the previous lady said. She lives in a three-bedroom apartment right now and if she's correct, she would be paying $740 is that right for a three-bedroom? Barry said he didn't know without knowing more about your circumstances. So, she said, it's about the circumstances. She said, like the lady said, she doesn't even get $740

for her rent so if you can't pay it what do you do, kick us out? Put us out if you can't pay the rent? She said that's all she wanted to say. She is one of those people who don't have a lot of money and she does not want to be put out but she does not have no $740 for no rent. She does not get food stamps, she is buying everything out of her little $600+ a month plus paying her rent. Thank you.

Northington said let me clarify something about the flat rents. That's just flat rents, that does not mean what you are going to have to pay. It's based on your income so if your income is lower than, we take 30% of adjusted gross income, so if you only get $600 a month, 30% of that is $180 so you don't pay $700 you pay 30% of your income with certain deductions.

Laster asked if there were other questions, comments, or concerns.

_____ said she thought the basic flaw in the whole study is one that suspiciously ____ Texas connection but is probably committable but, more objectively, how do they determine the flat market rent, who contributes to the reference stated here in Louisville that allows HUD to decide what the fair market rent is and did this adjust for the traditionally higher rent that white pay than black pay because white people get better housing. After World War II they moved into the suburbs where black couldn't go so she doesn't know anybody in the West End who would pay $485 for an efficiency apartment as the standard rate. That's the story so she challenges the whole premise of the study of that.

Cleopatra Buckner said in just listening to this she doesn't understand a lot of what's being said and it's new to her as she thinks she came in January and they introduced this to us and then she came back today but the most important thing is, number one, we do need to pray and fast that the Lord would give us wisdom and knowledge to understand how to deal with this because it is a whole lot that we don't understand and a lot of people won't speak up because they don't understand so the young lady that spoke, Gilia, she really said a lot because we don't have a lot of jobs, a lot of times people need jobs and they cannot get jobs, but what she just did, to me, is an invitation to a lot of jobs that we can invent ourselves, the Housing Authority can invent, because we need people that understand that can speak the language because see if you don't go through it you're not going to really understand clearly what people are going through would go through. She said she knows what she is going through and she knows how rough it is for her and if we don't have people that can explain things, sit down and talk, you are going to have a lot of people that are just going to ignore it and then rules are changed, plans are changed, and people have to accept it and people can't afford it because, she said, she knows that she can't. So, she really feels that if we do have representatives that's a job opening for someone, just part-time to be a representative in some sections that get the information and talk to the people, help people to understand that your voice counts, you need to speak up if you disagree with it because that's a lot of money to have to pay out when you don't even have an income. She said she was insulted when Cathy mentioned that what she noted was that they are doing a study pretty much on black women. Now if that's true, that's an insult, that's a huge insult to me, she said, because she knows she is a black woman that really wants to work and it's difficult to find a job that she can do. For some women maybe they don't want to work but from what she understands a lot of women do want to work and cannot get jobs so by not working by choice, maybe that fits some but it doesn't fit all the black women who have aids. So, she said, she feels really passionate that

if you really seek the people that really want to work and if you help them and give them the avenue to work, they will work. There are so many problems that need to be fixed and, she said, she really feels that if we take a different study and maybe it is time for change and to work things out but to just throw something at a group of people without people clearly understanding and, she said, she knows that happens all the time, but without people clearly understanding what's going to happen that's unfair to a lot of people and she feels like it is unfair to her so she would encourage that whatever they need to do and if they can't attend these meetings, please pass the word out, those that are here, spread the word that we need to be at the meeting if you possibly can. So, she said, she wrote the date down so the meeting is now June 24 at 3:30 and it's in this building, so please spread the word so that we can get a clear understanding of what the changes are and if we don't want that, if we feel like that's not going to fit us, then we need to speak up and say so. But, this is really important. This is what people do when they don't vote, they feel like if I don't understand who's running and I don't know anything about them, which if you don't have a computer at home you can go to the library and get that research, but a lot of people won't and she knows some people that are physically challenged can't but she means the ones that can, go to the library and look up the people that are voting and see what they stand for because when you don't vote or when you don't speak up you are speaking volumes and you actually are voting and what you are saying to your opponent is I agree with what you say because I'm not speaking against it so if we don't agree you have to say what you believe or get clear understanding of what is being said. Ms. Buckner said she doesn't clearly understand all of this but she does want to understand it more but some of the things that she did hear sounds unfair and she does really strongly believe we need more clarity and we need it broken down to us so that we can understand what's going on because just like we were thinking the rent was $700+ but it's just 30% of your income, that makes a big difference. So, we need to understand then we will know what to stand against but if we don't get a clear understanding and we are not allowed that opportunity and the laws are changed and passed, then that's not unfair to the people that you are changing the laws that are going to be affected by. So, she said, she just wants to encourage you, like she said, to please have different people, just put it out there so that we can know that if you can give us an opportunity to represent or to help get the message out and to explain it, then we can explain it to a larger group of people and then come back with a clear understanding of what is being changed and what is being said and what it means so then people can know, know I really don't like that part, know that's not going to fit me, this is my situation, because a lot of situations you will never know because you are not down there but when you are there and living in it, and she said she knows as she experiences it then it's a totally different from what people understand. Thank you for listening.

ADD SHIRLEY'S COMMENT – COULDN'T HEAR CLEARLY ON TAPE AS SHE WASN'T AT THE MIC.

Hinko said when this program was first started, people paid 25% of their adjusted income for rent and utilities, not 30%, so you actually got it right on the head about what the original vision of what affordable is to people with limited income, so thank you.

Patrick Sims said he knows a lady earlier had wondered what they based the rent against maybe to set a rent here and all he can say is he was absolutely, he is the only one in the family that is in public housing, his youngest brother in Lexington just pays an apartment rent just like anyone

else would, he's not in public housing, his rent is almost $1,000 a month and that is for an apartment that, he said, is not much bigger than what we have upstairs and that's in Lexington, Kentucky and if he had moved, and he was considering about moving and where he looked to try to find a place it was going to be over $1,000 a month and that doesn't include his utilities or anything else and Mr. Sims said he just sort of stood there with his mouth open and thought oh boy do I have a deal here. Mr. Sims said he doesn't know how in the world he does it but, he said, he thinks that's what they base things on and that evidently is the market and this is not a luxury apartment, although it does have a swimming pool. He said which does bring up something else, believe it or not a bus driver asked if we had a swimming pool in this building and he said, well only if the pipes break. But, really, he said, his brother evidently does make a good salary at his job, he is a computer expert, and he is glad he does and he's glad he can afford to pay that but he had no idea, because over $1,000 would have been more than his sister and her husband are paying for their house. He said that might be what they are basing rents on because his brother's apartment is not some beautiful, luxurious, 10-room apartment, his bedroom is just big enough to put his bed in.

James _____ said he doesn't live in public housing but is just a curious spectator to see what's going on because he has heard about this. He said he can't wrap his head around it's a minimal but you need not worry about it. In the world in which he works, minimal means minimal and you pay the minimal so unless you are going to do a whole bunch of exclusions, there's going to be a lot of people in trouble, unless, he said, he is missing something.

Someone asked to explain what the minimum was. Northington said the flat rent is not the minimal, that's the maximum, that's the most a person would pay for those style apartments. So, in other words, if we say $400 a month for a one-bedroom, that's the maximum, the most. The 30% of their income has to be at least up to $400 a month. If the income is greater than that, let's say if the 30% calculation comes to $500 a month, they only have to pay the $400, they would not pay the $500. You mentioned about his brother paying a $1,000, let's say if he had enough income that 30% of your income, let's say $30,000 a year would be $900 per month, $3,000 a month would be $900, right, so therefore you could say 30% would be $900, your rent should be $900, we're saying we are only going to charge you $400 not the $900.

_____(MAN) said the problem is what the folks out here are seeing is, what their understanding is, if they only make $500 and you are telling us that the minimum is $400, these folks are thinking that they are going to be left with $100 and that needs to be explained a little better to them. He said if that's the case it would be figured of the $400 not the minimum which means there is no minimum.

Northington said someone mentioned minimum earlier and he thought they were talking about the minimum for Section 8. There's a minimum amount that HUD is saying that they would have to pay. He said he didn't know what that is, is that $50 now. Laster said it's $100 in the proposal. So they are saying the least that you can pay would be $100 a month. But if the income is high enough to where you report more, it's all based on your income basically.

Mohamed interpreting for someone. She says I am a Parkway resident and I've been living there since 2006 and I live in three-bedroom and I was paying $358 a month but July 1 my rent is

going to be $742 and I live in a three-bedroom and I have 11 people in my household so why are we not going to get Section 8 because Parkway is not a part of Housing Authority, just Iroquois and Sheppard Square are the ones only can receive Section 8, not Parkway. When my oldest child tried to go outside he got into fight with someone else and they still question me to pay $742 a month beginning on July 1. So, I believe that everyone living in public housing should be equal and African-Americans and us Somalis should be part of the same but the African-Americans are treating us like we are not actually American so they just do whatever they want to do to us and when we call the police, the police department tells us to move from Parkhill. We need help from the government.

_____ said _____ and for elaborating on what I had already said but as I am still listening to how things are going, people are still afraid of what the rent issue is going to be but also she said she has greater concerns but she feels like Parkway Place is truly getting the short end of the stick within the City of Louisville because there is so many things that they have been denied and since she has been out there she's noted things that have denied out there to the people that other communities are getting and receiving help. Forgive me for saying this but we have something, what we call, you all have something that they call volunteer services for work within Parkway Place. There is enough that could be done and people could be clocking hours for what they are doing community-wide right there in Parkway Place. We have elderly people that have a hard time getting to the store. A section could be set up for people that would go in and help the elderly clean, run errands for them, and stuff like that. And, like she said, she's talked to too many of the officers and up at Parkway Place their hands are actually tied because they can't take them kids to their parent's door and, they have, and then when they came to the door they need to be writing citations for the parents at the same time because, she said, she feels like after you get so many of them citations and pay that money out of your pocket and you've got to pay rent too so are you going to have your child being obedient as to when it comes to where you live at. It's not where you live, it's how you live and if you want to be cited you need to live cited. Don't throw the rock and then try to hide your hand. Stand up for what you do, stand up for what you believe in and, she said, she does, whatever I believe in I stand up for and I fight for and hold for. But, she said, she seriously believes that we need to sit down with a powwow and have some things happen out in Parkway Place because this lady was just talking about her kid can't even come out the door and that's a bad situation. There is a little five-year old that stays in the building maybe two buildings from me, a little bitty cute thing just as friendly as she wants to be, but every time that she goes down to that park somebody is threatening her and she has ran to me many times with tears in her eyes and I'll walk her back down there and I'll tell them to leave her alone. The situation is bad. In order to live we've got to pay our rent to live anywhere but Parkway Place, I don't know if it has been put in a black hole or what it has been put in, but it's not getting the stuff that it needs, it's not getting the care that it needs and just getting somebody that is going to say something today and then next week you are not going to know which way they are or know how their head is going to be, the standard is not a good thing. We need people with heart, people that love life and love there they are and love other people. You've got to love people in order to do things for people. So, she said, she is just asking, Mr. Barry, if you could take the timeout somewhere to tell Ms. Orr that you would like to have a meeting with some of the residents at Parkway Place and just listen to us. Barry said he can do that.

Hinko said she just wants to add for people at Parkway Place, saying she wanted it translated, the Housing Authority has a budget in terms of capital improvements about upkeep of the property. Parkway Place is scheduled to get about $200,000 but Sheppard Square is getting $2.5 million so you can see where you rank in terms of importance of keeping up the physical plant at Parkway Place.

Barry thanked everyone for attending saying we will stay here for a while and answer any individual questions you have. He asked Mohamed to ask the Somali families who had questions about their rents to stay for a minute and they will talk to them.

C-J
6-21-14

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MURPHY OIL USA, INC., mailing address P.O. Box 7300 El Dorado AR, 71731, hereby declares its intention to apply for a NQ Retail Malt Beverage Package license no later than June 27, 2014. The business to be licensed will be located at 7000 Raggard Road., Louisville, Kentucky 40216 doing business as Murphy USA # 7533. The owners are as follows: President, R. Andrew Clyde of 520 East 8th St., El Dorado, AR., 71730. Vice President, Jeff Goodwin of 504 East 14th St., EL Dorado, AR, 71730. Secretary, John A. Moore, of 2316 Ridgewood, El Dorado AR., 71730. Any person, association, corporation, or body politic may protest the granting of the license(s) by writing the Department of Alcoholic Beverage Control, 1003 Twilight Tr. Frankfort, KY 40601,-8400 within 30 days (KRS 243.430) of the date of this legal publication.

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Request for Grant Applications Commonwealth of Kentucky Kentucky Adult Education

The Council on Postsecondary Education, on behalf of Kentucky Adult Education, seeks applications for English Literacy/Civics services during July 1, 2014-June 30, 2015, in the following counties: Barren, Boone, Calloway, Christian, Daviess, Fayette, Franklin, Graves, Hardin, Hopkins, Jefferson, Jessamine, Kenton, Logan, Madison, McCracken, Oldham, Shelby, Warren and Woodford. Grant funds are provided in compliance with the Adult Education and Family Literacy Act and KRS 164.020 and 151B.410. The application materials will be posted at www.kyae.ky.gov on June 23, 2014. **Final applications must be received by 5:30 PM ET, July 14, 2014.**

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Louisville Metro Housing Authority (LMHA) hosts Public Hearing to discuss intent to plan for Choice Neighborhoods transformation of the Russell Neighborhood and Beecher Terrace Public Housing development

The LMHA previously announced a public hearing on June 26, 2014 at 6:00 PM at Avenue Plaza, 420 S. 8th St, in the 2nd Floor Community Room to discuss the Agency's draft 2014-2015 Annual Moving To Work (MTW) Plan.

The LMHA is now announcing an additional agenda item for this meeting: discussion of an application for a Choice Neighborhoods Planning Grant for the Russell Neighborhood and Beecher Terrace public housing development.

Information about the Agency's intent to apply for the Planning Grant is included in the draft 2014-2015 Annual MTW Plan amendment, which will be available for review June 24, 2014 until July 24, 2014, and can be found on the LMHA website (www.lmha1.org) and at LMHA's Central Offices, 420 South 8thStreet, or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502)569-3420. TDD: (502)587-0831.

Lou Metro Housing Auth.

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Louisville Metro Housing Authority (LMHA) hosts Public Hearing to discuss intent to plan for choice Neighborhoods transformation of the Russell Neighborhood and Beecher Terrace Public Housing development The LMHA previously announced a public hearing on June 26, 2014 at 6:00 PM at Avenue Plaza, 420 S. 8th St, in the 2nd Floor Community Room to discuss the Agency's draft 2014-2015 Annual Moving To Work (MTW) Plan. The LMHA is now announcing an additional agenda item for this meeting: discussion of an application for a Choice Neighborhoods Planning Grant for the Russell Neighborhood and Beecher Terrace public housing development. Information about the Agency's intent to apply for the Planning Grant is included in the draft 2014-2015 Annual MTW Plan amendment, which will be available for review June 24, 2014 until July 24, 2014, and can be found on the LMHA website (www.lmha1.org) and at LMHA's Central Offices, 420 South 8th Street, or by mail as requested. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information, call (502) 569-3420. TDD: (502) 587-0831.

Complaint continued from page 5

regarding the accessibility of the William Estates Apts. property, which revealed that certain common areas were inaccessible to people with disabilities. The owner, Mt. Sterling Place Apts. II LLC., denied any violation of the law. The Kentucky Commission on Human Rights during the course of its case investigation assisted the parties in resolving the complaint with a conciliation agreement. Sterling Place agreed to compensate the council in the amount of $500, to bring into compliance property areas that were not accessible to people with disabilities, to undergo fair housing compliance training, and to submit to commission compliance monitoring for three years.

Beverly Eversole v. Kimberly Hawkins and Alex-

area of housing. This would be a violation of the Kentucky Civil Rights Act (Kentucky Revised Statutes Chapter 344) and the U.S. Civil Rights Act and their respective Fair Housing acts. Eversole claimed she was harassed based on a perceived disability and that she was unlawfully required to provide personal health-related information to the property owner's representative. The respondents denied any violation of the law. After the commission investigation, the commission prepared to issue a determination of probable cause, indicating there was evidence to believe discrimination may have occurred. Prior to the probable cause issuance, the parties chose to resolve the matter with a conciliation agreement rather than pursue further litigation. The commis-

the commission for three years.

The Kentucky Commission on Human Rights is the state government authority that enforces the Kentucky Civil Rights Act, and through its affiliations with the U.S. Equal Employment Opportunity Commission (EEOC) and the U.S. Dept. of Housing and Urban Development (HUD), enforces the United States Civil Rights Act.

The Kentucky Civil Rights Act makes it illegal to discriminate against people in the areas of employment, financial transactions, housing and public accommodations. Discrimination is prohibited based on race, color, religion, national origin, gender, and disability. In employment, discrimination is further prohibited on the basis of age (40-years and over) and tobacco-

LOUISVILLE METRO HOUSING AUTHORITY

Public Meeting

TO DISCUSS

The Draft 2014-2015 Annual Moving to Work Plan, Including the Housing Choice Voucher (HCV) Rent Reform Study, Disposition of 2 Properties, the Flat Rent Significant Amendment, and Intent to apply for a Choice Neighborhoods Planning Grant for Beecher Terrace and its neighborhood, And the Rent Reform Study Addendum to the HCV Administrative Plan

Thursday, June 26th, 2014
6:00 p.m.

At Avenue Plaza located at 420 S. 8th St, Louisville, Kentucky, 40203
In the 2nd Floor Community Room

Please join Louisville Metro Housing Authority (LMHA) staff at a public hearing to discuss the Draft 2014-2015 Annual Moving to Work (MTW) Plan, including a HUD-sponsored Housing Choice Voucher (HCV) Rent Reform Study, the Flat Rent Significant Amendment, disposition of two LMHA-owned properties, and the Housing Authority's intent to apply for a Choice Neighborhoods Planning Grant for Beecher Terrace and the surrounding neighborhood. The HCV Rent Reform Study Addendum to the Housing Choice Voucher Administrative Plan will also be on the agenda. The hearing will take place at 6:00 p.m. on June 26th, 2014 at Avenue Plaza in the Community Room on the 2nd floor. Information about the agenda items is included in the Draft 2014-2015 Annual MTW Plan and proposed Rent Reform Addendum to the Administrative Plan that will be available for review until July 13, 2014 on LMHA's website (www.lmha1.org) or by mail as requested upon calling (502) 569-3420 or in person at the following locations:

LMHA's Central Offices
420 S. 8th St
Louisville, KY 40203

LMHA's Section 8 Office
801 Vine St
Louisville, KY 40204

Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203
Phone: (502)569-3400
Fax: (502)569-3459

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Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; Mandatory Changes to Flat Rent Requirements; and
Choice Neighborhoods Planning Grant for Russell Neighborhood and Beecher Terrace (Plan Submittal Amendment)
Avenue Plaza, 2nd Floor Community Room
420 South 8th Street, Louisville, Kentucky, 40203
Thursday, June 26, 2014
6:00 PM

Please indicate (or check) here if you would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings.

Name	Organization/ Development	Address/Phone Number	Email Address	Yes/No
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. MARWA KARAMA		1620 MOOR CT #29		
2. NUNAY OSMAN		1617 Brashear Dr. Apt 40210		
3. HAWA ABDI		1719 PATTCOT #4F		
4. Virgie Peters		400 So 8th Apt 1210		
5. [illegible]		502 Avenue Plaza		
6. Sidolu [illegible]		1702 PATTCOT		
7. AMINA OSMAN		1602 Markwell Apt J 40210		
8. [illegible]		446 Simmons ct Bldg 13 40203		
9. Haven Harrington	Concerned Assn. of Russell		westlouisvilletalks@gmail.com	✓
10. Patrick Simms		400 S. 8th St. Apt. 906		
11. Shirley Solomon		418 S. 17th St.	S.Solomon1029@gmail.com	
12. [illegible]		1155 [illegible]		[illegible]

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; Mandatory Changes to Flat Rent Requirements; and
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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. Mable Morris				
2. Christopher Garey		583 8642		
3. Mohamed Mabuto		1601 Bryan Shera Dr #26 B		
4. ABDIKADIR ABDULLE		1617 Brashear Dr #25-E 40210		
5. Fatuma Maraad		1306 South 13th Street		
6. Joyce Greene		400 Clover Ct. Bldg 55 587-0017		
7. Wanda Hall		443 West Ct #45		
8. Carl Taylor		400 8th 410		
9. Willie Downs		1619 M South 13ST		
10. [illegible]		400 8th St. 583 9438		
11. RALIA D'ROW		1208 Moore ct Apt 10-F 40210		
12. Mohimoosman		1706 Backing Ct. Apt B		

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; Mandatory Changes to Flat Rent Requirements; and
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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. Yonda Harris	Beecher Terrace	422 So 10th #40 Rent 543		
2. Robin Carrington				
3. Tonya Wise	LMHA	—	—	
4. DiAngela Ralston	Beecher Terrace	1200 Cedar Ct. Bldg 11		
5. Jessica Bellamy		415 W Teuny Ave, Louisville 40214	Bellamy.jessica@gmail.com	Yes
6. Saida Ali		550 So 8 St #535		
7. JDW HARBOMIKOM		550 So 8th #534		
8. Marshall Smith	Parkway Beecher T.	1714 So 13 Bldg 3b APT F		
9. Jeanetta Anthony		400 So 8th		Yes
10. PATRICE FERGUSON	AVENUE PLAZA	400 S. 8TH ST. #611	patrice.r.ferguson@gmail.com	✓
11.				
12.				

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
Housing Choice Voucher Rent Reform Study; Mandatory Changes to Flat Rent Requirements; and
Choice Neighborhoods Planning Grant for Russell Neighborhood and Beecher Terrace (Plan Submittal Amendment)
Avenue Plaza, 2nd Floor Community Room
420 South 8th Street, Louisville, Kentucky, 40203
Thursday, June 26, 2014
6:00 PM

Please indicate (or check) here if you would you like to receive emails regarding Housing Authority updates, policy changes, and public meetings.

Name	Organization/ Development	Address/Phone Number	Email Address	YES/NO
Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. Tracy Holmes Bell	LMHA	Vine Street		
2. Michael T. Harbin Sr.	"	4314 Bishop, Lv #508		YES
3. Jeff Beer	Legal Aid Society	416 W. Muhammad Ali	jbeer@kslou.org	yes
4. Jim Hurst		400 S. 8th St.		
5. Valerie Davis	"	"		
6. Carl Sifgrave				
7. Michael Poindexter	NC3	415 W Terry Ave	michael.poindexter@gmail.com	✓
8. Marshall Gazaway	425 Claver Ct. #56	502-552-2145	seabass0305@att.net	✓
9. Chris Mu		107A		
10. Carolyn Epson		Hope Mu 407B Muhammad Ali		
11. Halima muya	1614 D moore	" "	" "	
12. Habiba muya	1612 brashear Dr #A			

Louisville Metro Housing Authority
Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
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1. WANDA Perdue	-	494 Simmons		
2. Lynn McCallie	LMHA			
3. Councilwoman Scott	Metro Council	— on file —		
4. Carol Kraemer	Louisville Sharing Up for Racial Justice	1936 Payne St 40206	cjkraemer1936@gmail.com	
5. [illegible]	LMHA	—	—	
6. Habiba Muya	LMHA	1612 Brasheear Dr 1/2	fatuma Mohadi	
7. ABDIMBARK		1618 Brasheear Dr #204 40210	fatuma Abdi	
8. FAUMAMS		"		
9. Erma Simpson	LMHA	568 65th 400 S 8 ST		
10. Khadijo Sheikh		458 10th		
11. Asjaha Imi		1719 Patton 45J 40210		
12. [illegible]		400 S 8th St #505		

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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. Katya Taylor	"	4314 Bishop ln 309	Ktaylor@mail.com	
2. Jonathan Musselwhite	–	144 N Kent 40206	jonathan.musselwhite@gmail.com	
3. Carla F Wallace	Showing Up for Racial Justice	120 N Jane 40206	ccarnewt@aol.com	Yes
4. Phyllis Taylor		400 So. 8th St. 1215 40203		
5. Alfred Knox		400 5th 8st	AlFredKnox	
6. April Corbin	LEO weekly	301 E. Main St. #3 40202	ACORBIN@leoweekly.com	YES
7. Brenda Bentley	P	[illegible]		NO
8. BAHATI MUSAWWA		1614 Grove CLEB		
9. Medha Ballard	Solla	3403 W Muhammad		
10. [illegible]	[illegible]	400 S 8th 171	—	
11.				
12.				

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Public Hearing to Discuss Draft 2014-2015 Annual Moving to Work (MTW) Plan;
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1. [illegible]	Housing Authority Mother	420 W. Court St Lou, Ky 40203		
2. Jay Miller		413 E Muhammad Ali		
3. Ms. Carolyn Harrison		400 South 8th St #805	Charrison403@gmail.com	Yes
4. Curtis Sandusky		Dosker Manor		
5. Jean Marbly		(502) 224-1434 #56 1725 Patton Ct		
6. Fatima Yusuf		1607 H Moore Ct	A-Samaka@hot	
7. Osman Baare		1601 F Brasher Dr 26 F		
8. Annelia		Ntakimazi	1736	
9. Bucumi-Aline.		1743 Patton Ct 3D.		
10. Pafas		Harimenshi	1736	
11. [illegible]		1500 W Chestnut St	msjackie0040@gmail.com	
12. Lisa Osanka	LMHA	801 Vine St	osanka@lmha1.org	Y

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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. Thelma Martin	Commissioner	420 S. 8th St #1409	—	—
2. Chris McCarney	Resident Council	420 8th St #406		
3. Wayne Gilbert		400 S. 8th Street 1009		
4. Vera Morrow		415 E Mohammad Ali Bld 1601 C		
5. Deborah Gilbert	LMHA			
6. Reg. Wilbert Andrews		415 E Mohammad Ali		
7. Sylvester Pair	LMHA Resident Council	1114 S. 4th Street #708		
8. Olevia Flannon		1610 Bulger Ct. Bldg K		
9. Rodney Thom		"		
10. Stephanie Montgomery		1202 Fisk Ct Apt 17		
11. Mariam Williams	UofL Anne Braden Institute			
12. Kevin Fields	LCCC, Inc.	1300 W. Muh. Ali Blvd.	kfields@lccnews.org	yes

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Example – Jane Doe	Louisville Metro Housing Authority	420 S. 8th Street, Louisville, KY 40203 502-569-3400	Jdoe@lmha1.org	Yes
1. SHARON MONTGOMERY	Will Seay Plaza	4314 Bishop Ln #503 Louisville 40218	Smontgomery0612@gmail	✓
2. Gregory Bowman	Avenue Plaza 400 South 8th			
3. Nimo Mohamed		1620 moore ct Apt HB 29	Nimomohamed23@yahoo.com	✓
4. FADUMA ABDI		1608 moore ct Apt 31 A		
5. Cathy Hinlo	MHC	P.O. Box 45 33 40204	cathy.metrohousing@...	✓
6. JAMIE BEARD		951 ELLISON AVE	JAMIE.BEARD@LOUISVILLE.EDU	✓
7. Jisho HASSAN		1602 B moore CT		
8. K. O'Neil	LMHA	1220 P. Moore CT		
9. Peggy Wilkinson				
10. Jeanette White	LMHA	1725 F Dalton Ct # 56F		
11. Tom MOFFETT	Kentucky Alliance ARCAR	945 S 5th Apt 623 40203	tommoffett@att.net	
12. BISHARO HUSSEIN		1602 Moore Ct Bldg 32 #A 40210		

Louisville Metro Housing Authority

Public Hearing

Avenue Plaza, 2nd Floor Community Room
420 S. 8th St, Louisville, Kentucky, 40203

Thursday, June 26th, 2014
6:00 p.m.

Agenda

- Welcome and Introduction
- Goals of the Moving to Work (MTW) Program
    - Increase Housing Choices for Low-Income Families
    - Incentivize Families to Become Self-Sufficient
    - Achieve More Effective Expenditure of Federal Funds
- DRAFT FY 2015 Annual MTW Plan
    - Disposition of two LMHA-owned properties
    - Choice Neighborhoods Planning Grant for Russell Neighborhood and Beecher Terrace
    - Changes to Public Housing Flat Rents
    - HUD/MDRC Housing Choice Voucher (HCV) Rent Reform Study
- HCV Rent Reform Addendum to the Housing Choice Voucher Administrative Plan
- Public comments
- Adjournment

Proceedings will be recorded on tape and a summary of comments and responses will be forwarded to HUD for review.

Public Hearing
June 26, 2014
Avenue Plaza, 2nd Fl. Community Room
420 S. 8th St., Louisville, KY
6:00 p.m.

Tim Barry, Executive Director of LMHA, welcomed the attendees. He introduced the translator, _____, for the meeting.

Barry asked Sarah Laster, LMHA's MTW Program Coordinator, to come forward and talk about the goals of the MTW Plan and then we are going to change the agenda a little bit and talk about Choice Neighborhoods Planning Grant for which we hope to apply in Beecher Terrace.

Laster said the Housing Authority has been one of 39 agencies with its designation commonly called MTW since 1999. As previously stated, there are about 39 agencies now who have this designation. It provides the housing authority with a degree of regulatory flexibility that other agencies across the country do not have. As part of its participation in the program it's required to produce what is called a Moving to Work Annual Plan. Every year when we put that Annual Plan out for public comment we also have this public hearing as an opportunity for us to share some of the highlights of the Plan with you all and for everyone to share their concerns, thoughts, and comments on the contents of the Plan.

Laster said there are three main objectives of the MTW program. They are to increase housing choices for low-income families, incentivize families to become self-sufficient, and achieve more effective expenditure of Federal funds. In addition to the three federally established objectives of the MTW program, LMHA has established six locally defined MTW objectives. Those are to increase the share of residents moving towards self-sufficiency, achieve a greater income mix at LMHA property, expand the _____ dispersion of assisted housing, improve the quality of the assisted housing stock, reduce and/or reallocate administrative operational or maintenance costs, and enhance the Housing Authority's capacity to plan and deliver effective programs. In addition to these goals, the Housing Authority has added develop programs in housing stock that is targeted to populations with special needs, especially those people who are not served elsewhere in the community.

Laster said for those of you who joined us several weeks ago, some of this information she is about present may be repetitive, noting there are a few key changes though so please pay attention and, she said, she will try to highlight those. First she would like to review the anticipated changes to the Housing Authority's housing stock. As previously discussed, the Housing Authority anticipates acquiring 135 units this year, those are public housing units and it anticipates actually constructing 91of those at the Sheppard Square site; acquiring an additional 25 units as Sheppard Square replacement units, those will likely be scattered sites off the footprint of the property; also anticipates acquiring 15 units at Wilart Arms, which was a mixed-finance initiative of the Kentucky Housing Corporation (KHC), The Housing Partnership, Inc. (HPI), and HUD Office of Multi-family Housing, its development that was formally known as Hallmark Plaza – it has been beautifully renovated by HPI and the Housing Authority would like

to acquire 15 units of public housing at that site for low-income families. In addition, the Housing Authority anticipates acquiring 4 public housing units at Stoddard Johnston Scholar House; this is yet another in a series of very successful Scholar House programs across the Louisville area. This one is located at the site of the former Stoddard Johnston Elementary School. Since this Annual Plan was first put out for public comment, the Housing Authority has now proposed to dispose of 3 units of public housing at two separate properties. One of those properties is now located in a flood plain as redefined by MSD locally and MSD has offered to purchase the property from the Housing Authority. The second property is located out South 22nd Street and that property, the Housing Authority has done major lead and asbestos abatement at that location and has found that the cost to make it once more habitable is not within reason so the Housing Authority is looking to also dispose of that property. So, three units at two separate LMHA owned properties.

Laster then reviewed the leasing information for the coming year. By June 30, 2015, the Housing Authority expects to have 3,819 of its public housing units leased and 9,192 of its federal what are called moving to work vouchers under _____. In addition, the Housing Authority expects to be serving two families under what is called a local non-traditional program and the Housing Authority has entered into an agreement with Frazier Rehab to allow the organization to sublease two units at the Liberty Green Community Center to low-income patients who are undergoing rehab. Bringing the grand total of families served at just over 13,000.

In the fiscal year 2015, which is also the period July 1, 2014 through June 30, 2015, the Housing Authority is proposing two brand new MTW activities, the first of which is a new special referral program with Seven Counties for individuals referred to the Housing Authority through Seven Counties, a sort of community treatment team. The second activity is the housing choice voucher rent reform study which will be covered after this review of general information is completed. LMHA is proposing to provide up to 50 vouchers to low-income families referred through Seven Counties as our community treatment team. Seven Counties will provide supportive services for these families and LMHA will provide rental assistance through the voucher. In addition to the two brand new activities, there are several activities included within the section on proposed activities that have already been discussed at previous public hearings, those two activities, as described earlier, the Housing Authority has an agreement with Frazier Rehab to sublease public housing units to low-income patients and we are proposing to do a similar program with YouthBuild Louisville which some of you may know provides job training and education services to low-income individuals in high school. The sublease agreement would allow YouthBuild Louisville to contract directly with the Housing Authority and subsequently they could lease units to their low-income participants. The second activity that has been previously proposed but never incorporated into an annual plan is the potential conversion of some of the Housing Authority's special referral programs with Family Scholar House into local non-traditional programs. Basically what the Housing Authority is proposing is to convert the tenant-based voucher subsidy that it currently provides to these sites into a block grant type subsidy. If the Housing Authority decides to do that, the Housing Authority would propose in more detail the activity. This is basically just things that we are going to take a look at, how feasible that is. Block granting subsidies to special partners is not something the Housing Authority can currently do under existing regulations but with its MTW authority, that is a

different strategy for providing rental assistance that the Housing Authority would like to explore. The Housing Authority is also proposing to make one minor change on its ongoing activity that is a special referral program with Family Scholar House. The voucher rental assistance provided to Scholar House graduates have been limited to five years after graduation but the Housing Authority would like to provide some relief to Scholar House participants who graduate and then enroll in the Housing Authority's homeownership voucher program and allow that participant to continue beyond the five year sunset period. This applies only to graduates of the Family Scholar House program who are receiving voucher assistance. If the family graduates from Family Scholar House and they are receiving voucher assistance, what the Housing Authority is proposing is to not require the five year time limit and instead to provide relief from the five year time limit if the family enrolls in the homeownership program. This concludes the newly proposed and changes to ongoing programs.

Laster said we need to talk briefly about the Housing Authority's use of an MTW flexibility called single budget use of funds. The Housing Authority, unlike other housing authorities across the nation, can combine its public housing, Section 8, and capital fund into one lump sum, if you will, one block grant. LMHA would like to use this flexibility to potentially fund what would be called our homeownership maintenance specialist position. That position has been contemplated for some time, we've not found need for it as of yet but we would like to continue to have that flexibility. Additionally, the Housing Authority is proposing to transfer approximately $7.6 million in Section 8 money to the public housing program, this is to cover a large shortfall due to ongoing cuts to federal budget. And, traditionally, LMHA has made transfers to the public housing program from both the capital fund program and the Section 8 program. This year's budget only requires a transfer from the Section 8 program, but the Housing Authority would like to retain the ability to transfer money from the capital fund program to the Section 8. The transfer of funds is necessary to continue to operate the public housing site at the level that they've been operated in in the past.

Laster said finally, included within the MTW Plan at the very back are two appendices, one is called the definition of substantial deviation and significant amendment for modification to the annual MTW Plan. This definition lays out the circumstances under which the Housing Authority must go back for public comment whenever a change is made to the Plan. This year, because of some changes that were made to the capital fund program, the Housing Authority would like to add an additional criteria and that criteria is proposed demolition and disposition for homeownership capital fund financing development or mixed finance proposal. There was another appendix that's called the flat rent significant amendment. Juan Hunter with management at LMHA will be explaining more about the changes to flat rent in just a few minutes. For now, we are going to talk about _____.

Barry thanked the folks for their patience noting this is all stuff that we have to do for the record to make the public aware of new elements in our Moving to Work plan. He then recognized two of the Housing Authority's Board members attending, Manfred Reid, Chairman of the Board, and Thelma Martin.

Barry said he was going to read a statement into the record regarding Choice but, he said, let me talk off the statement briefly. Barry said he knows there are residents here tonight who are

concerned about what might happen to Beecher Terrace, as there's been some attention paid to that facility needless to say over the last few days by the media and others. Barry said Choice neighborhoods is a grant program offered by the federal government that replaces a program called HOPE VI and many of you have heard of HOPE VI and we've used HOPE VI successfully in redeveloping Cotter and Lang, Clarksdale, now Liberty Green, and most recently Sheppard Square. That program is no longer, it is gone, it's been replaced by this administration with a program called Choice and Choice is like HOPE VI in many respects but much, much bigger and it allows for the opportunity to do neighborhood redevelopment.

Barry reading: "Choice neighborhood replaces the HOPE VI grant, it is broader in scope in that it involves transforming whole neighborhoods instead of focusing on a public housing site. Community residents, as well as schools, early childhood care providers, health centers, parks area, businesses, and other neighborhood stakeholders, including other affordable housing providers, will be involved in the transformation plan process." This is a planning grant for which we are going to apply. Let me underscore that, this is planning money we hope to get from the federal government which is a very, very competitive process and there's no guarantee we're going to get it and if we do get it we will go through up to a two-year planning process for what might happen to Beecher Terrace and the East Russell neighborhood. The planning grant also includes a needs assessment of every Beecher Terrace household. If LMHA is awarded the grant, then we look at creative ways to address some of the past challenges of redeveloping its sites. LMHA is currently working with the Metro Human Relations Commission and the Metropolitan Housing Coalition to determine what the best bedroom mix would be to meet the needs of our current residents and residents on our waiting list. We are looking at innovative housing types, including flexible floor plans which might pair larger apartments with one-bedroom apartments directly next door; this is a change from what we have done typically to help us address the ongoing challenges of changing family demographics such as _____ families, multi-generational families, or extended families, live-in aides for the disabled _____. Approximately 10 grants will be awarded and the award date is expected around January of 2015. This is a very competitive process with over 100 applicants typically applying for the planning grant each year, so only 10 have been awarded typically in the past. Agencies other than the housing authorities are also eligible to apply which wasn't the case with HOPE VI, HOPE VI was just housing authorities that could apply. With Choice, housing authorities, affordable housing providers, metro governments can also apply. If LMHA gets the planning grant, it would be several years, at least two to three years, before any Beecher Terrace families would need to be relocated so we are several years out on doing anything if we even get the money. And, before we even consider doing that, LMHA would also to obtain additional funds to do those activities and build back all the replacement units. HUD is currently offering Choice neighborhood implementation grants to do those kinds of activities which is a separate grant application so we can apply for planning money and if we get planning money then we can do the plan and then we can apply for the implementation portion of this Choice opportunity. Those grants have been around $30 million and that process is even more competitive; only four implementation grants were offered last year and possibly fewer grants will be offered this year. LMHA cannot apply for an implementation in the same year it applies for a planning grant. Choice grants require one-for-one replacement for every public housing unit demolished. Currently residents compliant with their leases who remain complaint during relocation must be allowed to return to the new on-site and off-site replacement housing units. And, finally, no

work or income requirements are permitted as part of the re-occupancy criteria for former Beecher Terrace residents who would also be offered waitlist preferences through initial lease-up period of the new units; that's a change and that's a big change, and, Barry said, a very good change. Barry said he wanted to underscore something he said earlier—nothing is going to happen anytime soon, we are going to make application to the federal government for some planning money up to $500,000, the application is due August 12, 2014, we will be notified whether we got it or not sometime around the holidays, maybe even after the holidays, so we are not certain we will get the money and again it's very, very competitive. If we get the planning money we have up to two years or more to do a plan for the redevelopment of not only Beecher Terrace but the East Russell area, so we are a long way out from doing anything in terms of relocating people or demolishing the first building and that process requires, as well it should, all kinds of resident and neighborhood input and, to that end, he mentioned that we are having a Beecher Terrace resident meeting to talk more about Choice on July 8 at 6 p.m. at the new and improved Baxter Community Center. For those of you who have been anxious to get in the Baxter Community Center, Barry said he apologizes that it's not done yet but it's supposed to be done this week. It looks very nice and certainly far better than what you had to deal with before. We will be sending out a flyer to every Beecher Terrace household letting them know about the meeting because we know there are a number of families from Beecher Terrace who obviously aren't here tonight so we want to make sure everybody know well in advance that we are having this meeting on July 8. Barry said he would expect the flyers would go out very soon.

Laster said she wanted to be more specific about the two properties that LMHA has proposed to dispose of. She offered apologies that she had picked up the wrong notes and didn't have the addresses in front of her previously. The first is at 720 S. 22nd Street, this is the property that is within the newly defined 100-year flood plain that MSD has offered to purchase. The second property which actually contains two units is located at 2709 Virginia Avenue, that's the property where the Housing Authority has completed remediation of lead and asbestos containing material and has found the additional rehab work to bring the building back up to our standards is cost prohibitive. And now Juan Hunter is going to speak about the changes to the public housing flat rent policy.

Barry thanked everyone for their patience saying these are things we are doing that are required and we want to get through them as quickly as we can because we want to give ample time for comments/questions so if you could continue to be patient as we get through this he would certainly appreciate it.

Juan Hunter, Regional Director at LMHA. He asked if everyone had the handout that reads "changes to public housing flat rent requirements". If you have this particular handout you will be able to refer to this handout and it will give you more details as to the requirements that are coming ahead. HUD has sent out notifications and mandates and requirements that all the housing authorities would have to set their flat rents at least or equal to 80% of the fair market rents. Referring to the handout and asking attendees to look at the top bullet as it identified the fair market rents in Louisville. The flat rents will not be implemented until October 1, 2014. If you refer to the handout and look at the second bullet, you will see in the last column it identifies what the flat rents will be increased to on October 1, 2014. This graph shows the current rent that is charged for various size units and it shows from zero units, which are efficiency units, to

four-bedroom units and shows what the current rent is. The Louisville Metro Housing Authority was already in the process of increasing the rents prior to HUD sending out the notifications that the flat rents would be increased. Based on the Louisville Metro Housing Authority already receiving approval for the rents to be increased, it you would at that second column that's dated July 1, that's the date that's effective for our rents that we had planned to increase on that particular day. At the top of it, it says $365 for an efficiency unit and that particular amount as you read down you will find that it's the amount that will be increased on July 1, this is flat rents only. Again, effective October 1 the last column identifies what the flat rent amount will be increased to. HUD states that the housing authorities cannot increase the rent to this particular amount initially, it's something that has to be phased in; therefore, the rent cannot be increased no more than 35% a year. In some cases this amount will be reached in one year's time and in other cases it will take two years to reach this total amount. This is only pertaining to those who have chosen flat rent or those who are currently on flat rent. If you are currently not on flat rent or chosen flat rent, this doesn't pertain to you. Hunter said he will repeat that-if you are not on flat rent currently then this does not pertain to you. If you will recall at the time of recertification or even coming into housing during intake, you are given a choice in which to select income-based rent or flat rent. Those who selected income-based rent, their rent is based on 30% of their income, this does not, again, pertain to you. Thank you.

Next, Laster introduced Deborah Gilbert, Assistant Director of Leased Housing at LMHA, who will speak about the housing choice voucher rent reform study.

Gilbert said she is here to talk about our rent reform demonstration study. The US Dept. of HUD is conducting a rent reform demonstration program designed to test and evaluate an alternative rent policy implemented by several moving to work public housing agencies. LMHA has agreed to participate in this study and as such will modify policies and rent calculations for program participants and will compare the results of a group of program participants who are assisted under the rent policies used for other PHAs assisted households. This rent reform study applies to the housing choice voucher program only, so it only applies to Section 8 participants. The proposed alternative rent policy includes the following key features: a change in percent of income that voucher holders pay for their share, from 30% of adjusted income to a maximum of 28% of gross income. Counting the 28% of gross income will thus eliminate the deductions and allowances. Some minimum tenant rent will be paid directly to the landlord in the amount of $75 and this is a change from the previous $100 minimum rent. We will also ignore household asset income when the total asset value is below $25,000. Participants in the study will have a tri-annual recertification which means we will recertify them every three years; this also means that your income will not affect your rent portion for three years so, as your income goes up, your rent will stay the same. There will also be a simplified policy for the utilities which will help to reduce the calculation cost and errors. As part of your handout, you have the simplified utility allowance schedule, you will see it has a base rate and then it has add-ons according to the utilities that you are responsible for and the type of utilities. Also the utilities are going to be based on the lesser of your voucher size or your unit size. LMHA is one of the four public housing agencies participating in this study. Other agencies include San Antonio Housing Authority, Housing Authority of the District of Columbia, and Lexington Housing Authority. Gilbert said she forgot to add that another feature of the study is that we will have hardship policies to protect tenants with exceptional circumstances from harm such as excessive rent

burden. Louisville's alternative rent policy will apply to only a portion of the participants in the Section 8 program and we will exclude elderly and disabled households and households currently in the family self-sufficiency program as well as households in the Veterans Affairs Supportive Housing program and certificate programs, households who were referred to at LMHA's special referral and Family Scholar House. There would be up to 2,000 eligible households that would be randomly assigned in this study. There will be 1,000 of participants that actually will be the intervention group or the study group and then we will have 1,000 participants that will be the control group. The control group, their re-certifications would be processed according to our current policies, not the revised policies for the study. Households will not have the option to opt out of the study and they will not have the option to select which group they would like to be a part of. As part of the study, HUD has contacted MDRC, Urban Institute, and the Bronner Group and others to help develop and implement the rent reform policy and also to provide technical assistance and to evaluate the impact of the alternative rent policy on both households and the Housing Authority. The full activity description is contained with the draft 2014-2015 Annual Moving to Work Plan.

Cathy Hinko, with the Metropolitan Housing Coalition. Hinko said she is going to respond to three of the four parts that were presented. The four parts were the general moving to work plan, but there was a part on rent reform and she said she was not going to comment on that, there was a part on the study or experiment which is what they call, it an experiment on our citizens, and the fourth one is about Beecher Terrace. When it comes to the plan in general, the thing that is shocking is that they are taking more than 10% of the Section 8 budget to make up some sort of shortfall and this would not be permitted except that they have this moving to work designation. This is $7 million, their whole budget is $98 million, the Section 8 budget would have been $64 million so they are taking more than 10% but, you know what is, that's 800 families that are condemned to not have housing assistance because the Housing Authority could not control their budget. There is funding hardship for all housing authorities but this housing authority has chosen the easy way out by using their moving to work designation to fell to solve their funding problems in other ways and that is why they are telling 800 families, Hinko said that's her calculation of what would happen with the $7 million, that, gee, we had this money for you but you know what we think we are just going to spend it somewhere else. Hinko said she suggests that until all the Board members of the Housing Authority go to the waiting list and visit families where children are sleeping on couches and their possessions are in plastic bags and say to those children we had money designated for you but we are choosing to do something else with it that they not implement this. Hinko said she also believes that a, and she said she said this before, but I'm not talking about wrongdoing, she thinks an audit of the staffing and administration like what Jefferson County Public Schools did in saying what is good staffing, what is good administration, should occur and we should ask our Kentucky State Auditor to do a job and administration audit. We have already seen the success through Jefferson County Public Schools of getting an audit like that and being able to spend more money on students and, she said, she thinks we need that audit here. Remember, Hinko said, she is not saying there's any wrongdoing, she is talking about an audit that says what is the most efficient way and what gets money to help people in the community. Equally shocking is that the Housing Authority in this document says, "oh trust us to move another 20% or $20 million around as we choose without any public hearing." Hinko said she thinks the Board of the Housing Authority should hold this Housing Authority to a higher standard, she would suggest 5% that before there's a public

review. Remember, she said, she is not saying there may not be a reason to move more than 5%, she is just simply saying that we should be able to see what is going on if more than 5% of the budget has to be moved. Now, she said, she is going to move on to Beecher Terrace and the plan. One of the things is that this Housing Authority needs to think of itself as part of the entire community. This Housing Authority should be actively promoting zoning changes and actively promoting an affordable housing trust fund to source so that the first thing we should do is make it possible and then build affordable housing in other neighborhoods. The first thing we should do is offer opportunity and choice before we destroy anything where a lot of low income people live. You know everyone pretends that getting money from HUD has no cost, doesn't create any misery, but if we did get a choice neighborhood grant one thing is that they would rob Section 8 even more because they would be allowed to take Section 8 and change it into public housing, that does not add a single unit, that subtracts units from what we would have. The other thing is, should this happen, you know they have to hold open unused at least two choices for every family. Well you know what, there are, right now, 17 almost 18,000 households on the waiting list for Section 8. This is not the time, this is not the way we should upstage our public housing. Also, why is Beecher Terrace on everyone's target? Have you been to Parkway Place? They cannot do a choice neighborhood grant application for Parkway Place because Parkway Place is in a place that is not even a neighborhood. So what the Housing Authority should be paying attention to is Parkway Place and figuring out how to do that. Also, Hinko said, she went through their old reports. The Housing Authority had 6200 units of public housing, now they have 3800 and all of the units lost were units for families. It is no wonder that they have 17,000 households on the waiting list for Section 8. Hinko said she is not against modernizing public housing but I am simply saying that we need to work with the places that need intervention first and you also need to stop chasing these random HUD dollars and we need to find a funding source for our community so that we can do this logically and we can do this at the right time. Then, we get to the study, and she said she has talked about this before so she won't cover a lot of the same points again but this study is not a study. In their own words this is a social experiment with people who do not give consent and those people, when you take away the people who are not eligible, are black women and children, subject to an experiment that they have no ability to give consent as to whether they will participate or not. Hinko said she had talked about how there will not be a childcare deduction so that the Housing Authority and HUD officially take a stand that they do not care if children are in good childcare. Hinko said she also only have had the utility charts for six minutes before this meeting started so she is sure she will want to go over how those are done. The other thing is, she said, she did not stress this as much but for people randomly chosen to be experimented on, they will be subject to a minimum rent and the control group and everyone else will not so how fair is that that these people are just plucked out and told that now they have to pay more than someone else in the same condition that they are in will have to pay? Now this Housing Authority is committed to helping as many people as they can who would be subject to minimum rent but they can't make it go away or there would be no experiment. And think about what this means. Section 8 is where, by law, at least 75% of the new people coming on are supposed to be very low income so we already know that this is the program for very low income people and then as soon as they're on, we slap them across the face. So, we like the three-year certification because you can come in if your income goes down and you do not have to come in if your income goes up, that's great. But in terms of fair housing, well people who fit into the elderly or disabled categories, at least in public housing, already do not have to come in every year and you know what else, those families

automatically get a $1600 or $1800 deduction but families with children are going to get no deduction, is that fair? For these reasons we think the Housing Authority should not approve this experiment and that's the word of their design people, experiment, on black women and children without more review and more input. We definitely are against minimum rent and we definitely are against the loss of a childcare deduction. In closing, she said, she just wants to make sure that, and she'll ask Lisa, there would still be a yearly inspection of the unit which is great because that is a wonderful service that you provide and Lisa is saying yes, so that's good. And with that, my remarks are concluded.

Laster asked if there were other folks that would like to speak—Ms. Livingston?

Rose Livingston, JCPS. I am here to talk about something a little bit different, education. Livingston said she was a past Board member. Since 2006 she has worked on "The Beech" which is at Beecher Terrace. She said "I want your help." I want your help in helping me to identify your children, your students, that need help. We have the center but it is closed. We need to get more students involved, K-12. The problem has been that is hasn't been opened very much. As an educator and assistant principal for the past 20 years, education is the key to empowering and helping our young people grow up and have productive lives, it starts right now. The goal is to get skills enforced, in other words help along the way, and then also making up high school credits. It is also a goal to help those who want to complete their GED get that done too. So, today I said I wanted your help. We've got to work on communication and also making sure that parents, grandparents, push the children to come on out and get the help. I am inspired today as I talk with Ms. Shirley, who also has expressed some of these same issues to me, so, I am going to be at a table, I want to get your name, phone number, and your child a list and get them involved starting this summer, probably July, and then looking at through school year how to help reinforce the skills. Okay, grandmothers, mothers, we will get an interpreter if we need one. Every single person in here who has a child, a grandchild, and they want to get them extra help, see me at a table here at the end of this meeting so I can get your name and your number. Grandfathers and dads too, uncles, everyone. Thank you.

Attica Scott, Councilwoman for District 1 on Louisville Metro Council. Let me start by saying thank you to our interpreter who has to interpret multiple voices from different people for hours. Scott said she just wanted to speak briefly on three of the issues. First one is the rent reform study or social experiment and, she said she would have to say as a black woman, as a single mother, as a renter, that it is very disturbing to her and appalling that we don't even have to get any kind of special permission from human beings to be experiments on. We have a policy of being extremely dehumanizing toward people who live in public housing and as someone who grew up in Beecher Terrace and went to Coleridge Taylor Elementary School and whose granny still lives in Beecher Terrace, we can do better and we should do better. My second issue is with the flat rents and all I want to say about the flat rents is that next week people's rents will be raised yet incomes will not be raised. As a city we need to look at all of these issues comprehensively and we need to ask ourselves what are we doing to people, are we setting people up for failure who are our neighbors who we should care about and who we claim as a compassionate city that we love. And my third issue very briefly is around Beecher Terrace and the choice neighborhoods. The federal government has a wonderful way of manipulating language and when I hear hope and choice I have to ask hope for whom and choice for whom?

She said she hopes that there are several options besides demolition that the Louisville Metro Housing Authority is going to look at as it relates to Beecher Terrace. I hope that there are issues that the Housing Authority will address like how much will homelessness increase when you demolish Beecher Terrace, are you tracking those numbers and tracking people? And, as we look at the increase in gang violence in our city, will you pay attention to where you are moving people, especially young people to areas where they are going to be in conflict with warring gangs? And let me just end by saying that as people we have a right to speak out, we have the right to ask questions, and, she said, she hopes that you will be there on July 8 and encourage other people to be at the Baxter Community Center on July 8 because it is our responsibility to at least challenge the system and say that we can do better. Thank you.

Kevin Fields said he was here on behalf of the organization he provides leadership to, Louisville Central Community Center. If you don't know about LCCC, we are a community-based organization located here in the Russell Neighborhood and have been here for some 66 years and we have properties that are located within the Beecher Terrace neighborhood, our mini-versity downtown and we also have out headquarters where our family services are offered at 1300 W. Muhammad Ali. Fields said he is here to address the moving to work plan, in general, and more specifically the plan to pursue the choice neighborhood planning grant on behalf of the Russell neighborhood and Beecher Terrace. The moving to work plan as we understand it is an opportunity for the Housing Authority to exercise some discretion, some flexibility when it comes to designing as well as implementing some of the policy. So as a community we believe that this plan offers something that's good and that the Housing Authority can think creatively, innovatively, and operate in a public domain in a transparent way in conjunction with stakeholders. So, we believe that the Housing Authority is committed to that. On the Choice Neighborhood Planning Grant, he said he just wanted to read an excerpt of what this grant offers in terms of opportunity for the community. The choice neighborhood program supports locally driven strategies to address struggling neighborhoods within the distressed public or assisted housing through a comprehensive approach to neighborhood transformation. Fields said he will stop there because we believe as an organization that our community is in need of change, a transformative change, especially in areas of economics. We believe that we need to create more jobs in our community and we are looking for every resource that's available to support that. So you might ask why is transformation important, why is change important? Well, we've been engaged as an organization in examining the conditions of our community for a long time, the economic conditions. So if you referred to the publication of March of 2013, the article put out by "Louisville Magazine", it gives you a clear picture of the disparities, the economic disparities that go on within our community. Just to give you an example of the disparity within West Louisville, which is bounded by 9th Street right outside of us all the way to the river in the West and then all the way to the river in the North all the way to Shively, some 22 census tracts represent households with an average median income that's less than half of the other side of the county and that's a concern to us at Louisville Central Community Center. So it's the economic conditions that drive the work that we do and so we are expressing concern that there needs to be a vision for transformative change and we've studied this need and have found that there is this barrier at 9th Street that is talked about often in our community and the boundary, the barrier, really is the blocks that represent Beecher Terrace and City View Park from 9th Street to 13th Street, from Chestnut to Jefferson. Now there's nothing wrong with the people, let's be clear about that, it's the condition, the hard physical condition so when we talk about distressed

housing we see clear examples of it when we look at Beecher Terrace. So the transformative change that a choice neighborhood offers is something that really is just a beginning point to change a condition that really would take years if not decades to affect. It's a type of change that we are talking about it a type of change that would encourage investment westward, would encourage economic development westward, would be the kind of change that would not only reform housing but would also reform economic development and create businesses that then create jobs on the west side of downtown. So for that reason we do support the application for the planning grant as a part of the moving to work plan and, he said, he does recognize and commend the speakers before him, Cathy Hinko who has such command for these issues and who is very articulate and very passionate. We stand with Cathy in making sure that these issues are addressed in a transparent way, this is a public housing authority so these issues are of public concern so he said he does echo Councilwoman Scott that we all need to have our voices heard but we also need to have progress and we also need to see change so if we go through the neighborhood that we are referencing and we walk through the neighborhood and we don't suggest that it is time for change then we can have a conversation but if we do agree that we do merit change in our community, economic change, jobs, increased income, opportunity for mobility, for choice in terms of where we live, where we work, what we do with our kids, if we can see that as opportunity then we would not stand in the way of the Housing Authority simply saying to the federal government, give us capacity, let us examine closely the need to change this neighborhood and not only change the housing but all the other surrounding conditions.

My name is Tom Moffett and I live at 945 S. 5th Street and I am a member of the Kentucky Alliance Against Racist and Political Repression . I was not designated to come here to speak for them so I am speaking for myself and I only found out about this a couple days ago and I haven't been able to do the kind of research that Cathy Hinko did or that Mr. Fields did but I think I want to say three things. First, he said, he came primarily because of the experiment and he strongly believes it should not be carried out as it is presently outlined. It should not be an experiment on people who have no choice in the matter. The thing, he said, he also reacted to very strongly was that he doesn't see much incentive. It talks about an incentive, the only incentive that he said he can see is the change from one year to three years certification which does sound like a reasonably good idea. But, where are the other incentives? The first thing you get hit with is an extra rent and that's enough to knock it right now in my opinion. That's backwards from everything that I know about what makes people want to do something. We don't do something because somebody is telling us what will happen if we don't do it, we do something because we want to do it. We do something to make things better and we need a good helping hand sometimes to get started. So if we want somebody to more actively work for work, give them an extra $75 for the first three months and see if they can find a job. If you want somebody to work harder to get work, don't take away the care that they get for their children, give them better care. Tell them if you sign up for this program voluntarily and you meet whatever requirements we want we'll give you an increase in your childcare subsidy so that you can put your child in a certified childcare center that really does something for your child and not just babysits. He said he feels very strongly about this and he is not an expert but he has been around for a while. He didn't know about this switch deal where you are going to take money from one pocket and put it in another but it's not taking money from your pocket it's taking money from somebody else's pocket, that's generally called stealing. He is not accusing the Housing Authority of stealing but he thinks they need to take another look. There's got to be a

better way. He said he's saying there's got to be a better way. One other thing about the third thing that he didn't think he was going to say anything about but he's heard a little bit more about it. This choice neighborhood idea. He said he likes some things about it but he heard something today that really made him think again. We can't afford to tear down any housing that is livable before we build some affordable housing all over this city. You don't burn down your house before you build a new one and the main thing from keeping us from building new ones is the zoning regulations. Most of this county you can't build a small house on a small lot, it's against the law and it doesn't make any sense and it means that too many of us, saying he has lived 40 years in the west end across from the housing project that has gotten torn down, it didn't make that neighborhood that much better, it's a little better, it looks better and he likes some of the things about this plan better than the old way it was done, he thinks there are some good things about it. He said he really appreciates the fact that the Housing Authority is providing an interpreter and thinks it is a wonderful thing and apologizes and said he is just not used to it. He said he is done but just wants to say one more time however that yes we need to improve our housing projects but the best thing we could do would be to open up more opportunities and, as Mr. Fields said, we need jobs so that people have opportunities and we need to put people to work not just have jobs for making profits we need to have jobs that put people to work and give people a living and then we can take care of improving our housing projects. He said he really thinks we've got this all backwards. We need to do first things first.

Carl _____ with the Black Coalition for Minority Concerns. He said one of the programs they initiated was thin the blocks of 34th and Market all the way to 41st and Market there were 11 liquor stores. They were able to eliminate all 11 of those liquor stores within that are and there are no liquor store that sell alcoholic beverages between 34th and 41st on Market Street. The conversation that we are talking about today is about Beecher Terrace and one of the things, he said, that he was able to get from Mr. Barry through the "Courier Journal" that the building was in badly need of repair. If you look behind you, 4th Street has buildings that are over 75-100 years old and they repair those buildings and it is beyond me why you can't take a place where people have as their home and live that you can't repair that area too. They also say that there is crime in that area and it is very bad. I can see the Police Station from here so what does that tell you? If they wanted to clear it out they would clear it out. They talked about the Cotter Homes/Southwick, which I am a little more familiar with, and about the fact of what had occurred down there and they talked about moving the people out and it wasn't as easy and it wasn't as great as they claimed and it you would check with _____ down there he said he thinks there was only 3% of the people who got to come back. They also talked about using the Section 8 program to help folks who are going to be displaced over there and, like the lady said, there is already 17,000 people, what are you going to do with them, put them behind again forever. How long does it take to get fair housing? What we need to do is repair what we've already got and come up with another plan later on to take the place of what we've already got. The other thing that he said he is appalled at is that Beecher Terrace represents a minority housing area that has been there for probably over 50-60 years and it represents our heritage too and every time you tear something down that represents black heritage, you take away from us, you take away history for our children, and it doesn't need to go anywhere. Eventually what you are going to see is they are coming out to Beecher Terrace, pretty soon they are going to go to 15th Street, pretty soon they are going to do down to 18th Street, and pretty soon the only place we will be able to live is on the river. The other thing is they just can't keep pushing us, that's

all. You know because we have a little less than others it doesn't mean they have the right to push us and then the other thing and I'm going close by telling you then is that, he said, he was in a meeting in March with the Transit Authority and they are proposing that they create kind of a subtype of transportation. He said I am going to let your minds wonder to where do you think that this substation is going to be running through? It's going to be running right through this area. They want this area as a substation for downtown Louisville.

Marshall Gazaway, President of the Beecher Terrace Neighborhood Association. Thank you all for your patience but mostly for your listening ear. So many people have been here to talk in so many different ways. He said he just happens to be a resident and the President of the Board. Briefly I would like to tell you that I once lived on Beech Street, 23 years, when Cotter Homes and Park DuValle came up with this very same situation. He said he happened to be the only residential person on the board at that time under Mayor Abramson and when they had the development plan so I've had opportunity to go through this before. During that process when they were tearing down, you talked about jobs and economics, he said he opened up a franchise there in Park DuValle for the beginning of what we would call economic buildup. He personally did that for what housing was bringing forth through redevelopment. Small tragedy, was with your postal service but got two disc injuries which, he said, made him disabled and he had to come out of work. What some are calling maybe, how they look at it maybe, but it was not an experiment how I got here. I lost everything because I couldn't work anymore and my job was taken away. Gazaway said he will call it a blessing, he was able to move into Beecher. So now, he said I've come to say for those who are residents, and he said he remembers his grandfather and them told this story when they first built this place 75 years ago, it was a good place for people to come in to live. The problem that housing with Beecher is that the people who don't have the concern of where they live, it's not where you live, it's how you live where you live. He said he is very concerned for everyone's opinions and feelings about the situation at Beecher but, he said, he has to be responsible for where he lives first, that's as plain as I can put it he said. I'm your president and have been working like crazy over here with things such as safety and if you notice that people park anywhere all into the grass you've got to walk clean around; the drug problem you don't see it as strong as it used to be, you have the safety of this right here working hard to get a pedestrian crossing from Beecher right here across to Liberty, getting everything painted so you will know where the parks so other people can take responsibility for where they live. But yet it's hard for me, he said, in all of Beecher Terrace in which we are talking about today, for me to reach out and get in contact with the people who live there so a lot of what's being said here today, some people have visions looking from far far away and things look terribly bad but yet they have to come close sometimes and kind of like live in that situation to find out it might be not that terrible, it might be a little good because wherever you are you can be responsible for you. July 8 they are saying coming to Beecher new renovated section over here at the gym and if you come you have the responsibility to stand there with me. I was living in a home then but that's where I lived right beside the projects but it didn't stop me from getting involved with housing and everyone else who came but I didn't let no one take a long vision to see how I was living right there in my neighborhood, I said I have to drop _____, Safety, we are working on now the crossing with the painting of parking correctly and having some respect for where you live. Drugs are being wiped out. He said he works with the First Division Police Department district and he is also a chaplain for the LMPD so he stays very involved with the police department on many aspects. Working day and night for not you but for

us. So on July 8, for all that everybody else has said and I thank you, he asks for all the residents to come to the meeting, voice your opinion from where you are, read what has been put before you, and study it. No one can speak better for you than you. We have a resident council that is active. The last lady did say speak out, ask questions, and, he said he would say to that, and definitely without question get involved. Thank you very much.

Barry asked if there were any other comments or questions. Thanks everyone for your time and patience and hopefully we will see many of you at our next meeting about Choice at Beecher Terrace on July 8

Proposed Moving To Work Activity: Rent Reform Study - Update

July 30, 2014

The Louisville Metro Housing Authority (LMHA) would like to thank you for your comments on the proposed Moving To Work (MTW) Activity: Rent Reform Study. LMHA values the community's input on its MTW Program.

In response to comments received during the public comment period, LMHA will make changes to the Rent Reform Study to provide households with the choice to "opt-out" of the alternative rent policy, reduce the minimum rent to $50, and exclude from the pool of potential participants households currently taking a child care deduction. These changes are further described in the attached.

LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate.

Also, LMHA will continue to work with area housing, legal, and supportive service providers to develop procedures for implementing the hardship policy, including procedures for the expedited waiver process that are considerate of the written 7-day notice and not inadvertently burdensome to families. Additionally, LMHA is working with its partners to create a package of wrap-around services that will be available to all households in the Study.

LMHA would like to thank HUD's Department of Policy Development and Research and the Rent Reform Demonstration Study team, including MDRC, for the opportunity to discuss the community's concerns and make certain changes to the alternative rent policy and study enrollment protocol.

For questions, please contact Sarah Laster at slaster@lmha1.org or 569-4471.

Sincerely,

THE LOUISVILLE METRO HOUSING AUTHORITY

Louisville Metro Housing Authority
Planned MTW Activity Rent Reform
Proposed alternative: A modified policy with household choice

July 24, 2014

- **Household Choice with "Opt-out":** All households randomly selected to be covered by the alternative rent policy will be given the choice to *opt-out* and stay with the current rent policy. Households assigned to the alternative rent policy group will have 30 days to notify LMHA of their decision to opt-out.

  LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate.

  Opting-out gives the household choice -- no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt out within 30 days.

- Policy modifications to address local concerns:

  - **Reduce the minimum rent to $50.**
    - The minimum rent already varies by site from $75 to $150, so reducing it (from $75 to $50) would be in keeping, in principle, with an existing planned variation in the model across sites. Also, a $50 minimum rent is allowed under current housing rules.

  - **Exclude households with a current child care deduction from the eligible group.**
    - This is a legacy group, representing a fraction (about 10%) of the current eligible group.

- Procedures, including a protocol for an expedited waiver process that is considerate of the 7-day notice of eviction, for implementing the hardship policy.

- Expanded and augmented wrap-around self-sufficiency services. Services will be available to households in the alternative policy group and the existing policy group.

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ANNE BRADEN
INSTITUTE

Anne Braden Institute for Social Justice Research

June 23, 2014

Tim Barry, Executive Director
Louisville Metro Housing Authority
420 South 8th Street
Louisville, KY 40203

Dear Mr. Barry and Board of Directors:

I am writing as a historian of American race and gender relations to express my concern at the participation of Louisville Metro Housing in the proposed HUD rent reform demonstration. My misgivings about this proposal are two-fold: one regards its content, while the other concerns the process through which it is being undertaken.

While I am not a quantitative researcher and not equipped to judge the merit of the research design in full, I question the wisdom of enacting this program--which is basically a pilot study-- on metro Louisville residents who are among our most vulnerable, i.e., low-income families with children who receive housing choice vouchers to assist them in being able to afford a decent place to live. Let's be clear that the primary thrust of this demonstration is increased deregulation of housing agencies, while increased self-sufficiency of residents is a hoped-for but secondary goal. The design also rests on some questionable implicit assumptions, such as the notion that poor families do not want to work, and that work is readily available for those who seek it hard enough. In fact, this population faces many other systematic obstacles to stable, living-wage employment, including transportation, education and training, and (as the design implicitly acknowledges) child care assistance. Perhaps if causation was clearly established between higher subsidized rents and workforce participation, a case could be made for local implementation, but at this point, the demonstration is basically a pilot study with no clear correlation established. Also, seventy-one percent of these voucher users are African American, and the majority of those, women with children. Cautionary tales abound from U.S. history of wrong-headed social welfare policies that start with an assumption of laziness, sloth, and irresponsible procreation on the part of African Americans. Indeed, commonplace research processes of informed consent and human

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subjects protection we know today originated out of the most flagrant of those abuses. Yet once again, in 2014 Louisville Metro, African American mothers who stand to be disproportionately affected by this policy are about to be shepherded into it with no opportunity for informed consent (which, troublingly, has been waived for this demonstration).

In Louisville Metro, as you know, the past 35 years have seen many cutbacks in public housing assistance that have been borne most by those known by policymakers as the "hard to house," meaning those with the very least resources among public housing assistance recipients. Even the local Hope VI revitalization projects, for example, have not stemmed the loss of multi-bedroom units that can accommodate larger families, who are often among those hardest to house. The current MDRC research design acknowledges that those families with little to no income will be disadvantaged by one tenet of this plan--the establishment of minimum monthly rents--making them, once again, on the front line of negative impact of experimental policies.

In light of all of these dynamics, I urge you to consider declining to participate in this experiment at this time. At the very least, I hope you will open this proposal to further and wider consideration before proceeding to enroll Louisville as one of only four cities nationwide (two of them in Kentucky) to implement this pilot study. Until the past month, there has been relatively little opportunity for citizen input and, still today, no consideration given at all, to my knowledge, to the views of those who stand to be most affected by this experiment---metro Louisville housing choice vouchers themselves.

Sincerely yours,

Cate Fosl

Catherine Fosl, PhD, director

Associate Professor of Women's and Gender Studies/Associate in History

August 6, 2014

Dear Mr. Barry, Mr. Reid, and other members of the LMHA Board,

I am writing to share my deep, continuing concerns about the revised HUD rent-reform experiment under consideration by the Board.

I appreciate all that LMHA is doing to try to help provide safe housing for many of the poorest in the Louisville area. I have heard of LMHA's history of honest and often successful efforts at innovation and efficiencies. There are, though, big and urgent challenges locally --20,000+ waiting voucher applications and the spectre of more and more Congressional pressures on HUD budgets. It is a complex problem, with many causes and many stakeholders.

The revisions (July 24, 2014) to the original experiment design have, to differing degrees, addressed some very significant concerns by:

- Lowering the minimum Total Tenant Payment (TTP):
- Requiring informed consent or an "opt out" to participation; and
- Eliminating households with child care allowances from the participant pool.

However, the HUD rent reform experimental design for Louisville as it stands today is still at best a distraction of LMHA's energy away from leading big, bold solutions to Louisville's low-income housing crisis. It does not serve the community well:

1. A minimum TTP—at any level-- is driven by HUD's need to manage total long-term "per household" costs, not by research evidence supporting a positive impact on tenant employment. Its cost literally hits only the very poorest and currently least employable tenants—mostly African-American mothers, along with their children. Minimum TTP, in effect, raises the actual percentage of adjusted income deemed "acceptable" for housing expenses higher than the traditional 30%--and only for the poorest.

   With the inclusion of an "opt out" to voluntary participation in the revised study, the numbers of people choosing to accept a minimum TTP should reasonably be expected to be very small. This will seriously minimize the likelihood of detecting significant policy findings relating to the impacts of minimum TTPs on employment increase among those very poorest.

   Implementation of any minimum TTP would be simply setting a precedent for its use and paving the way for future increases.

2. The MRDC research design study shows that those who need childcare but cannot pay for it will be hurt the most financially by the proposed experiment. Removing from the study pool those who have enough income to pay for child care and get the allowance for income adjustment does not change this. All families will still lose their dependent allowances under the new plan.

Removing household-specific deductions in favor of changes to simpler gross income thresholds is--just like any "flat" tax-- regressive.

In order to have truly "informed consent" by those participating, the design model must be rerun to see if using 28% of gross income to calculate allowable housing costs is "cost neutral" – for each subgroup, mothers especially , and not just for HUD and LMHA. The results—which would be shared with tenants and the community-- may either cost LMHA more money (if "cost neutral" to tenants) or drive those having those expenses—poor families—out of the LMHA system (if cost neutral to LMHA). The threshold will probably then need to be adjusted before LMHA would join the study.

The move to eliminate allowances and move to gross income basis hides the story in the numbers—it is a path to increase the "acceptable " levels of income to be used for housing expenses, making future increases appear less radical.

3. Participation in the HUD experiment by LMHA is unnecessary (and now, possibly in effective for aiding policy decisions because of the opt out). It is not breaking major new ground for unearthing and evaluating methods to increase employment among the poorest. True, the three-year retrospective income recertification is a likely "win/win" --because it temporarily shields increased earnings for tenants and will probably reduce HUD/LMHA administrative costs significantly. However, a similar extended (two-year) recertification is already being implemented and evaluated by the Washington DC housing authority.

   LMHA could choose to just watch the results from that program before acting to initiate this facet of the program and focus its attention more productively on the bigger problems elsewhere.

I strongly urge the LMHA Board to reject participation in the demonstration in its revised form, at minimum until the model is rerun using the new assumptions and better, current data for Louisville and then evaluated by LMHA and the community.

My concerns and comments are presented in more detail below, in three areas:

- Shortcomings of the Louisville revision of the HUD proposal ;
- Recommendations for revisions, potential structure and value of a new version of a demonstration that benefits tenants, LMHA and HUD
- Suggestions for where and how LMHA might coalesce creative work on Louisville-specific housing issues

For supporting understanding and evidence to substantiate my concerns, I primarily used the Rent Reform Demonstration Research Design document (RRDRD) issued May 2014 by HUD's consultant MRDC. I will show references to that MRDC document throughout my letter, and have underlined the key parts of quotations for emphasis. I look forward to your response and any corrections and clarifications.

Yours truly,

Chris Harmer

Steering committee, Louisville chapter of Fellowship of Reconciliation (for identification only)

1. Shortcomings of the revised HUD proposal

A. Overall, the heaviest negative impacts of the revised reforms for Louisville would fall on the poorest and on their children

If the government were trying to reduce the cost of tax breaks for the middle class and wealthy-- a form of welfare for the affluent—they would cut back those subsidies more for the higher-income households first or there would be a tremendous political outcry. Reduction of LMHA's costs per voucher—in this demonstration or in possible future budget cuts-- should not come disproportionately at the expense of the poorest among your voucher recipients. Yet, those are exactly the outcomes that the design modeling predicts. The highest relative financial burden of the changes are imposed on unemployed households with children with need for, but no access to, subsidized childcare. In LMHA, these households are largely headed by black women.

The research design report described a model analysis using LMHA data for a hypothetical single mother ("Maria") in Louisville with an infant who needed, but could not get childcare subsidy. In year one, while still unemployed, her net income will decrease by 9% compared to the current rules. Should she somehow find fulltime employment at $8/hour , in year four of the experiment her net income would be 14% lower than under current calculations (RRDRD, Table 6)

> "The alternative rent policy will likely increase the rent burden experienced by some households while reducing it for others, relative to the traditional policy. In particular, households at the lower-end of the income distribution, those with larger families, and those who experience a substantial drop in income over time may have the most difficulty affording the higher minimum TTP, putting them at increased risk of eviction or having their utilities shut off". (RRDRD, p.42)

> "Overall, larger families would be disproportionately affected by the new rent policy, at least in terms of the likelihood of paying a higher family share of shelter costs." (RRDRD, p.34)

Dropping (from the study pool) the households having enough income to pay for childcare and receive the LMHA child care allowance would not change these findings for the lowest-income families who struggle with "off-book" childcare arrangements. They would still lose their dependent allowances.

B. The minimum TTP—at any level-- is a regressive, additional financial burden that has not been shown to have evidence-driven basis for success in improving employment

There was an assortment of justifications for imposing a minimum TTP—at any level. For example:

> "...establishing a minimum TTP of at least $75 and requiring that all households pay at least that amount of rent directly to the landlord, to mirror the landlord-tenant relationship in the non-subsidized rental market" (RRDRD, page 7)

> "The alternative rent model's requirement that all households (unless granted a hardship exemption) pay some portion of the contract rent directly to the landlord will increase the number of households with a direct financial relationship with their landlords." (RRDRD, page. 42)

These seem very minor goals to justify a major social experiment and to inflict the minimum payment on the poorest, but the real reason that emerges seems even more unacceptable:

> "Tenants who do work during the three-year period before their next recertification interview might have done so anyway; they would enjoy a "windfall" to their income under the alternative rent policy. This may help improve their family's standard of living, but the housing agency would forego and not recoup subsidy reductions that it would have otherwise achieved under traditional rules (until the next recertification). The minimum rent and elimination of deductions and allowances are intended to counter these losses to some extent ." (RRDRD, p.41)

In a July 22, 2014 Courier Journal article, Andrea Wilson (Moving to Work Coordinator for the Lexington Housing Authority) indicated that the housing authority expanded the $150 minimum rent because of budget cuts from HUD and because "for the most part," people in that study--who are not in Section 8, found a way to pay the minimum rent. The article goes on to say, however, that the increase added $17,000 in monthly revenue for the Lexington Housing Authority during its 2012-2013 fiscal year.

To be fair, the same Courier-Journal article on the HUD demonstration proposal noted that LMHA Director Barry referenced a pilot study by the Lexington Housing Authority had raised the minimum rent at two of its public housing facilities. Employment in the experimental group doubled over two years, but data on the control group--and on turnover rates-- was not available. There just is no rigorous proof that reducing housing subsidies through minimum TTPs will "motivate" the poorest to find and sustain employment. There is also little effort to conceal the primary reason for them in the experiment.

There it is--the minimum TTP and the elimination of deductions and allowances are being proposed primarily to make the demonstration "cost neutral" to HUD. It would also appear that it would quietly set a precedent for their implementation (and increase, in the case of the minimum TTP) as cost-cutting measures in the future.

The old simile of "... like getting blood from a turnip" comes to mind. A minimum TTP would cause very difficult choices that working middle-class people might not be able to imagine--$50 a month is for us, after all, barely a dinner out with family or friends. It is, for us, not a matter of meeting basic needs—paying your rent, or going without diapers for children, skipping a prescription or dental work, or getting further behind on utilities.

LMHA already acknowledged this indirectly. It reduced the minimum TTP—arbitrarily--from the originally proposed $100/month to $75. Reducing it further to $50/month does not change the fact that any minimum TTP is a regressive tax on the poorest. It is not a co-pay—it is taking back part of a subsidy based on the government's acknowledgement that the household is already living on the edge. It is a tax on being poor.

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The HUD research design calls also for a new hardship review process to deal with problems caused by the minimum TTMs or the change in TTM calculation. This will add another administrative burden and cost in the LMHA processes, contrary to one of the goals of the project. In fact, the proposed hardship process would double the possible recertifications per year—a six-fold increase over the proposed alternative three-year recertification-- for the poorest households and for their LMHA case workers. It would also require staff flexibility and availability—and associated increased LMHA costs-- for near-immediate, eviction-driven responses. The combined net cost savings to LMHA from the minimum TTP and its required hardship process-- which is not addressed in the model analysis-- might be very small indeed, or nonexistent.

C. Removal of child care and dependent deductions from the income formula work against the ability of young mothers to work. They are not fully offset by a lower gross income percentage in the income formula

Louisville's poorest continue to face the slow-moving equivalent of New Orleans ' response to Hurricane Katrina—i.e., a series of governmental and institutional decisions and initiatives that are forcing our poorest to leave Louisville in search of housing, never to return. For example:

- State cuts to subsidies for child care;
- Razing—past and proposed—of low-income housing projects with few local low-income alternatives available for years without adding to the already miniscule availability for other low-income people(current backlog of housing voucher applications apparently exceed 20,000);
- Federal funding reductions to public housing programs.
- No funding and/or legal structures for obtaining and rehabbing abandoned buildings or for low-income housing loan program (e.g., low-income housing trust fund)

All this is not of LMHA's own making, but nor is it of the tenants'. LMHA—along with our other institutions—should be thinking and acting boldly to address these issues; at an absolute minimum, it should not add to the list. In the original HUD proposal, though, 93.1% of LMHA households with any children are projected to have to pay a higher "family share" of housing-related expenses under the new alternative plan (RRDRD, Table 11).

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> "To partially offset the loss of deductions, the portion of income that is applied to gross income is set at 28 percent (in contrast to the 30 percent rate applied to *adjusted* income under traditional rules)." (RRDRD, page 9)

Of particular concern to families is the impact of dropping childcare and dependent cost adjustments to income. Louisville has the highest percentage of households having any deductions from gross income (93.3%) among all the cities considering participation in the HUD experiment. There was no Louisville-specific data available for the model analysis, but across HUD programs, those receiving a deduction average $1,444/year. (RRDRD, Table 2). A reader of the MRDC report might calculate that, under the alternative approach using 28% of gross income (vs 30% of adjusted income currently used to assess ability to pay), a household with $7,000 annual income

(the average household income used in the model) would be expected to pay an additional $293/year ($1,960 vs $1,667 currently) for this proposed change alone.

Of course, the impacts of other government aid would probably enter in here, but the impact of the change—at the 28% gross income level—is regressive and hurts the poorest the most. If the gross income calculation were to be retained, the percentage must be re-evaluated and adjusted to net cost neutrality for each tenant subgroup (across employment status, income, and family status, at a minimum) or they would be unlikely to enter the experiment voluntarily.

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Even with setting a lower percentage of gross income for calculating ability to pay, child care costs (and availability) are a critical factor in employment and should be considered in any study looking for employment increases for heads of families.

> "The advantages of the new rules will be smaller for tenants who, in order to go to work or to work more, need external child care subsidies but cannot get them. The absence of child care allowances under the new rules will offset some of the benefit of holding TTP constant in the face of earnings gains for some families unless other child care arrangements can be found. Of course, many families who need but cannot get external child care subsidies have difficulty working even under traditional rent rules because the existing child care allowances are only an income deduction and do not fully cover child care costs. Thus, some families may not work under either rent policy because, if they had to pay for child care out of pocket, it would not pay to work." (RRDRD, page 27)

LMHA's energies should be focused on collaborations to remove a barrier, not ignore it.

D. The data used for the modeling were outdated and incomplete. In addition, the final revised model assumptions for Louisville also need to be included to re-assess specific impacts for individual tenants for participation decisions.

MRDC admits that the cost data used in the model analysis was not current.

> "For each household, the analysis estimated net monthly income under traditional rent rules and net income under new rent rules, making different assumptions about how much the parent worked (zero, 15, or 35 hours per week) and her hourly wage ($8 or, in some cases, $16). The sources of income and expenditures for parents included earnings, TANF, WIC, SNAP, child care subsidy and taxes, and the Earned Income Tax Credit (EITC)—prorated to get a monthly value—as well as estimated child care expenses and transportation expenses. It should be noted that the NICC at the time of this analysis was not completely up-to-date and has certain other limitations, so all estimates should be considered approximations."(RRDRD, p.27)

There was also no Louisville-specific data available for the model analysis of deductions and allowances. (RRDRD, Table 2).

Given the missing data and the proposed changes in minimum TTP, income calculation, and participant pool characteristics, the Louisville model needs to be repopulated, rerun and re-evaluated before LMHA could hope to get the data necessary for tenants to give informed consent for participation.

If the tenants with large families or young children were fully informed of even the current model analysis output, they would see plenty of reasons to balk at participation. The research design document makes it clear what informed consent and opt outs would do:

> "Early design discussions weighed the tradeoffs of using a voluntary or mandatory enrollment process. It was determined that a voluntary process would create a substantial risk that households volunteering for the alternative policy would not adequately represent the larger population of eligible voucher holders to whom this policy is intended to apply. Conversely, certain types of households may be reluctant to sign up for the new policy. For example, larger single-parent households might fear the loss of the dependent allowances and child care deductions, and non-working households might worry about the minimum rent requirements. For that reason, the MDRC team proposed a mandatory enrollment process." (RRDRD, p. 37)

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Louisville's newly- revised requirements to include Opt Outs and informed consent of participants will probably reduce the potential participant pool drastically within many subgroups. Those affected are not small segments of the tenant population. For example, family shares under the alternative approach for families with two or more children or with a child under five--regardless of employment impact over the three years-- will be higher in roughly three fourths of the affected households. (RRDRD, Table 12)

With smaller experimental group size, the minimum percentage change from the control group levels for statistically observable impacts—the Minimum Detectable Effect (MDE)-- may rise considerably. For example, to detect a statistically significant employment impact in an experimental group of 1,000 people(the number promised by each of the four cities), the rate of employment would have to rise by at least 12%. For an experimental group of 400, that threshold rises to 18.9%. (RRDRD Table 14). If—as seems likely—many of those who would be facing a minimum TTP did not volunteer, the sub-group sample size would be very small, and the MDE to see it would be much higher. Given the decrease in the proposed minimum TTP to $50/month and the small number in the "minimum TTP subgroup" who are likely to participate, it will take a very large employment increase to detect a "significant" impact, positive or negative, on employment. It begs the question—why include such a burden/variable in an experiment of this design if it was not likely to provide data for policy decisions?

The same issue would probably also surface with the impact of the shift from adjusted income to gross income standards on large families.

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Lastly, full disclosure for informed consent would also raise the issue of overall program cost neutrality in the experiment:

"The alternative rent policy is intended to be roughly *cost-neutral* from the perspective of housing agencies and HUD. This means that the combination of HAP and administrative expenditures should remain about the same as the total expenditures for assisting the same number of voucher holders under the traditional rent policy." (RRDRD, p.30)

If some community-oriented tenants know that the proposed changes for all people in the experimental group will cost HUD the same total amount as for the control, they would know any individual's temporary windfall comes directly at their neighbor's –probably their poorer neighbors--expense. They may choose not to participate in that exercise.

E. Many of the research questions could be resolved faster and with less financial harm to the poorest by using historical studies of situations where key factors—both positive an negative-- were changed

Social scientists from Louisville's universities have told LMHA that these evaluations need not be done by imposing these alternatives on tenants. There are study techniques available in their fields. For example, properly matched longitudinal studies using data from other selected HUD sites on past changes in TTP and in allowances could provide data (possibly with higher sample sizes) for the "before and after" impact of those changes, separated from other factors.

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Some of the research may already be done. MRDC in fact already has some indications of the likely answers. Three such program evaluation studies are included in the resume of MRDC's James Riccio:

Family Rewards -- Conditional cash transfers averaging $240/month for three years were given to families in New York City's (NYC) highest poverty communities. "There was an increase in the likelihood of self-reported full-time employment, but the program did not increase employment in or earnings from jobs covered by the unemployment insurance system."

Opportunity NYC—Work Rewards was a test of options including active case management support for job seekers, with or without special incentives paid every two months for sustained fulltime employment. The special work incentives alone produced no consistent overall effects for the full sample. However, they produced statistically significant increases in earnings for participants who were receiving food stamps at study entry. The FSS-only intervention produced a similar pattern of effects.

The Jobs-Plus demonstration tested in NYC looked at whether a program that combined employment and training services, new rent rules to "make work pay," and neighbor-to-neighbor outreach centering on work could make a difference in the economic prospects of public housing residents. Jobs-Plus operated in six housing developments across the country from 1998 to 2003, with the program model in place at most sites by 2000. A 2005 MDRC report showed that the program produced substantial earnings gains for residents in three of the six sites during the first four years after the program rolled out. There were many critical details in creating the effective program, including " ...creating real collaboration among housing authorities, social service agencies,

and residents; marketing rent incentives and services to diverse groups of residents; and dealing with enduring issues of safety, substance abuse, and other family crises."

There were mixed to moderate gains in employment even when there were only positive financial incentives, used in concert with a network of support services. This trend is generally echoed by MRDC in their model assumptions by what they call

> "...a common economic assumption for how much employment will go up as take-home pay goes up. We assumed that for every additional dollar of earnings, every 1 percent increase in take-home pay under the new rent rules over and above take-home pay under traditional rules will yield a 1 percent increase in the tenant employment rate. For example, if the tenant employment rate is already 50 percent, a 10 percent increase in take-home pay (under new rules vs. traditional rules) would yield a 10 percent increase in employment, raising the employment rate from 50 percent to 55 percent (or, .50 x 1.10=.55). " (RRDRD, p.31)

Such a rule of thumb would seem to lead to a converse conclusion-- that a decline in net earnings for a subset (such as participants who are unemployed and have families) of the population might decrease average likelihood of employment. This would seem to argue against the imposition of the minimum TTP and of the elimination of adjustments to income.

2. Recommendations for revisions, potential structure and value of a reworked demonstration that benefits tenants, LMHA and HUD

As I have said, I don't think the demonstration is going to break much new ground. Much of the policy analysis work and data could be obtained through other types of studies. I do not want the experiment to take away energy from developing new, creative collaborations more focused on the larger factors (partially listed earlier—e.g., lobbying, actual collaboration on childcare access, training and education for improving employability of tenants and creating job access).

However, I believe a HUD study would potentially fund some very useful analyses for Louisville. Among them would be:

1) Determining LMHA's level of effort/cost for specific and aggregate administration tasks;

> "For example, the research will measure changes in staff time and burden in verifying households' income and computing TTP amounts, utilities allowances, and UAPs; the frequency and time required to conduct interim recertifications and to process lease changes and changes in household composition; the frequency with which tenants seek hardship remedies and appeal hardship decisions; and the staff time and effort involved in administering the hardship policy and the particular remedies they most frequently apply. The research will also document notable changes in data management systems and software required to support the new policy." (RRDRD, page 39)

2) Developing detailed household costs and how government aid changes with additional earned income.

> " Depending on the evaluation resources, HUD may want to consider collecting TANF, SNAP, and Medicaid data, since changes in the receipt of these public benefits may flow from any impacts that rent reform has on tenants' earnings. If so, it would be important to capture these effects to understand the alternative rent policy's effects on other indicators' of family self-sufficiency. In addition, these data would be important to the proposed cost-benefit analysis". (RRDRD, page 47)

It would also be important to assess how LMHA might work to influence other larger barriers to reduce LMHA's and tenants' costs to third parties—landlords, LG&E, childcare advocates/providers, etc.—through shared cost savings. I suspect, however, that would fall outside this study.

For the present, though, I would support LMHA joining the Rent Reform Demonstration only after further critical modifications to the current revision of Louisville site experimental design:

A. **At the least, any demonstration should be devised to be "cost neutral" to its poorest participants and those with young children.** In its present form, it is not, nor is it designed to be. The current revision uses a " carrot and stick" approach. Previous MRDC program evaluations provide evidence that a more effective version would be all "carrot"—all positive incentives. That would require 1) eliminating the minimum TTP (at least for Louisville) and 2) reinstating deductions for child care, dependents, etc (or drastically dropping the percentage applied to gross income to families with young children). If new modeling showed that making these changes

would result in a total net increase in HAP costs that HUD would not support, LMHA should withdraw from the demonstration.

These revisions would also eliminate any remaining experimental design ethical issues, e.g., possibly inadequately informed consent.

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Having no minimum TTP in both the experimental and control group in Louisville could benefit the overall HUD study. It is parallel, though not identical, to the situation in Lexington:

> "Although the two groups in Lexington will pay the same minimum TTP, making it different from the other sites, this distinction does offer a learning opportunity. It provides an opportunity to measure the net impact of the combination of other changes in the rent policy, particularly the extended recertification period, above and beyond the effects of the minimum TTP." (RRDRD, p.25)

There is second benefit for not implementing a minimum TTP in Louisville.

If Louisville should ultimately choose to participate—but without a minimum TTP in either the control or experimental group--it would still give HUD and Congress a chance to compare city-to-city the impact of having any minimum TTP on employment increases. We could be compared, for example, with Lexington, where both groups also have the same minimum TTP.

The Louisville site may be the last chance to do this study of a minimum TTP's impact on employment. It probably can't be done completely in Louisville because of the small sample sizes in the minimum TTP subgroup that would be expected as a result from informed consent in such a study. If we have no minimum TTP in the study here, we would have a larger participation in the affected subgroup and they could compared more effectively with cities that do have minimum TTP for the same subgroup.

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Eliminating the minimum TTP would also eliminate the creation of a new hardship response process—and the additional hardships that require one.

B. **Repopulate, rerun and evaluate the Louisville-specific model using current data and these new assumptions prior to LMHA agreeing to participate in the actual experiment.** This evaluation would be necessary to establish:

- the net costs to HUD and LMHA;
- the net financial impacts on potential participants—by their various subgroups; and
- the minimum detectable effects expected.

Without this information, LMHA and the tenants cannot make an informed decision about both the local/personal advantages and the national policy value of participation in the experiment.

C. **Using evaluations of data from the updated Louisville-specific model, provide information to all tenants to obtain fully informed, voluntary participation in the program.** If the model shows that the results for subgroups are uniformly at least "cost neutral" for all, willingness to participate should be high and MDEs lowered.

The "opt out" should be changed to an affirmative "opt in". Otherwise, the 30-day deadline might force participation decisions before the tenants had fully understood the possibilities and responsibilities of participation. The New York rent reform studies referred to earlier were "opt in"; housing authority staff were involved in "... marketing [the study's] rent incentives and services to diverse groups of residents"

LMHA has rightly suggested community advocacy groups could be a helpful part of that education process.

D. **Implement the three-year, retrospective income recertification in an experimental group, matched with a control group .** It would reduce LMHA administrative costs. It would simplify explanation of the experiment to potential participants, and would be all "carrot" –during the longer recertification period--to the tenants. At recertification, it would return to being cost neutral based on tenants' then current income.

MRDC's (the HUD consultant) own research design document highlights shifting from an annual to a three-year income review (triennial recertification with retrospective income assessment) as the "centerpiece" of its proposal to encourage affected residents to seek and stick with employment.

This concept has some history already. The housing authority in the District of Columbia had already moved to a generally biennial recertification because they saw it as a win/win: lower administrative costs for them, and tenants would not have their TTP changed for an additional year, even if they increased their income (up to $10,000 increase). The tenants could use—or save-- that extra income for whatever they found most useful—immediate expenses, debts, education, etc.

> "Thus, the biennial recertification policy , when compared with the traditional annual policy, may create an increased financial incentive to move from non-work to part-time work at the minimum wage, and from part-time to full-time work, but not from non-work to full-time work (since this latter change would prompt an increase in TTP)". (RRDRD, page 26)
>
> "The three-year recertification period should also reduce the administrative burden and costs incurred by housing agencies by greatly decreasing the number of one-on-one sessions with tenants—potentially by thousands of sessions per year in larger housing agencies. It should also reduce the burden on tenants, who will spend less time having to document and report their incomes to the housing agency."(RRDRD, p.11)

E. **Implement the recommended utilities approach (based on Washington DC housing authority model) in an experimental group, matched with a control group.** This is aimed purely at administrative cost reductions.

> " In Washington, DC, both the new rent policy group and the control group will be subject to the streamlined utilities policy. However, the new utilities policy is more relevant to simplification and housing authority burden than it is to tenants' labor market decisions. In that regard, the lack of

distinction between the two research groups in on the utilities policy should not matter much in interpreting the impacts of the new rent policy on tenants' employment and earnings in Washington compared with the other sites." (RRDRD, page 25)

"It [the demonstration's proposed utilities support structure] is based on an approach developed by the District of Columbia Housing Authority (DCHA). The agency establishes a standard "base rate" for utility costs that varies according to the number of bedrooms a household is allowed given the size of its voucher. It also includes an additional payment for households that incur higher utility costs depending on the type of heat used in the unit (i.e., electric or oil), and whether the household is responsible for water and sewer costs." (RRDRD, page 19)

As with other experimental changes, it will be critical that the simplified utilities schedule can be shown to yield conservative (i.e, at least tenant cost neutral, compared with the equivalent control group in the study) allowances across the spectrum of households. This will probably result in higher utilities costs to a housing authority. In parallel with the experiment, LMHA should therefore put a high priority on tapping community resources for collaboration on incentives among all parties for demand-side energy conservation.

3. Think broadly beyond the limits of this HUD exercise. Working collaboratively, influence the local housing and job markets to serve Louisville's low-income people better

> "The assumed employment impact was estimated in the following way: With a 3-year income recertification policy, some tenants who are not currently working will likely choose to work because they will get to keep more of their earnings than they would under traditional rules. In other words, during the 3-year period, they will enjoy higher "take-home" pay because their TTP will not go up – in fact, they get to keep 100 percent of every extra dollar they earn (not counting possible losses in other benefit). With less of a "bite" coming out of their paycheck for rent and utilities, more tenants should be willing to work. "(RRDRD, p.31)

This design report language of choosing and willingness to work comes perilously close to calling on racial/ideological stereotypes for justification of changes to be tested in this proposed experiment. The LMHA board knows their tenants want to work and to be able to pay, from their own paycheck, for decent housing for their families.

Let us all be clear that willingness is not the main issue in efforts to increase household income.

MRDC itself identified factors that could dwarf any observed effects of this proposed demonstration's variables. For example:

> "It is also possible that the alternative rent policy will have larger impacts where jobs are more plentiful and, possibly, where affordable rental housing is more available. For example, tenants may be more willing to *act on* the incentives if they are more optimistic about being able to find a job (because of a stronger job market), and if they are less fearful about finding affordable housing if they earn their way off their housing subsidies." (RRDRD, p.48)

Probably any number of consultants in Washington, New York, or nonprofits and universities in Louisville could provide data on more salient factors preventing employment of a low-income person than their choice—willingness-- to work. While "net income increase for time expended"—a net hourly wage—is a fair final determinant in assessing a job opportunity for all of us, there are far higher barriers to finding the job opportunity itself. A partial list for Louisville—LMHA would already know many more elements—would include:

- High unemployment rates;
- Wages that are not increasing as fast of the cost of low-income housing (i.e., absence of a living wage);
- Louisville government proposals for regressive taxation through the local option sales tax and the utilities "fee"
- lack of easy physical access to jobs and education, both from TARC infrastructure limitations and from zoning policies that segregate low-income families into limited areas of Jefferson County;
- lack of access to job-focused education; and
- lack of affordable child care.

Frankly, LMHA has already done far more creative and "out-of-the box" initiatives than are found in the revised rent reform demonstration you are now considering. LMHA has initiated case management and worked in partnerships with local agencies and institutions on beginning to address many of these barriers. LMHA can continue and expand in these initiatives; at the same time, it must not add to the list of barriers.

Be bold and expansive in addressing both the fundamental employment issues of tenants and the costs that control how many people you can serve. Here are some ideas to spark your thinking and creativity. I hope you have already considered all of them.

A. Support for job seekers

LMHA provides safe secure housing so that the lowest-income residents can have a reasonably stable home for their family while they prepare for and find a job with a living wage. The factors listed earlier have combined to put 20,000 households still in need of LMHA services, and the turnover --when families find self-sufficiency-- has slowed under the recession and high-unemployment recovery.

Testifying on effects of policy and legislation-- Perhaps the Board should prioritize its work by keeping in mind the length of the waiting list of vetted voucher applications as one of the Board's own primary, relative measures of success of LMHA actions. It would be analogous to what the unemployment rate is for employment/economic policy. The homeless rate would be its measure of systemic failure, as is—for labor policy-- the rate of those who have stopped looking for work.

To the extent allowable under law and its charter, the Board of LMHA should be actively testifying and speaking out on policies and legislation at the local, state and national level that help or hurt employment chances .

Incentivize LMHA contractors to be trainers and first employers—Contractors working on LMHA projects—be it cleaning, landscaping, painting, or multi-unit construction—could be incentivized to use and train LMHA's tenants as a measureable part of its work force. The City of Louisville already has similar requirements built into its contract bidding system. This would provide tenants a chance to demonstrate their work ethic, learn a skill, and build a resume. Hotel Louisville may be a wonderful example to build on—I understand most of its caterers and receptionists are people who had been homeless. They are learning marketable skills in a managed environment that maintains the market place's expected service delivery standards.

Child care—Childcare availability, both financial and physical, is a critical part of a parent's preparation and availability for job opportunities. It may also be a part of the services LMHA could encourage through collaborations with providers and nonprofits. LMHA could offer free- or low-cost space in its residential buildings for lower-cost, cooperative childcare businesses, run partially by and for tenants of those buildings and Section 8 units. Residents and voucher holders could be trained for certifications in childcare through grants and paid in part through childcare credits. Ultimately, the childcare businesses—with the no profit motive and lower cost for space—would become self –supporting and an opportunity for some residents to demonstrate their work ethic and build resume.

This would not be unfair competition with those outside of LMHA's support. Moving people into employment will ultimately turn over the LMHA population and create voucher availabilities for more people from the 20,000+ who are waiting.

Sattelite basic job skills training sites-- There are many job skills-training and remedial math and reading education programs, but they are not always evenly dispersed geographically around low-income areas of Louisville. LMHA might offer space in its residential buildings and partner with churches to develop a network of more easily accessible sites for Section 8 and other LMHA tenants. JCPS, JCTC and other training programs might find this a low-cost way to increase their outreach and impact.

B. Cost Savings

Stretch your thinking about which groups in Louisville have the expertise—technical and/or financial—and a vested interest in the money flow in, and the success of, low-income housing. Expand this simple start:

- Tenants;
- LMHA employees;
- Contractors;
- Landlords;
- Utilities and weatherization contractors;
- city government and zoning boards;
- builders councils', the Green Building Council, and labor unions; and
- housing and childcare nonprofits .

LMHA can motivate each with participation incentives and sharing of cost savings. If LMHA brings the right interests together for collaboration and communication, the ideas will follow. If the stakeholders want to be in the housing arena, then LMHA has the right to challenge them to risk, to invest, to share the costs. Find incentives for them to make money reducing your and/or the tenants costs.

Structuring those incentives requires both collaboration of those stakeholders involved, and some detailed balancing of initial incentives and longer-term sharing. Louisville also has resources to help—at low or no cost-- LMHA's management team to aim this innovation process and to provide examples of success stories as well. LMHA and its board may have already investigated tapping such resources for visionary leadership:

- Louisville Office of Innovation;
- U of L Sustainability Council;
- Leadership Louisville;
- university-level Business Schools, social sciences, social work and urban planning departments;
- LG&E; and
- Housing and childcare nonprofits

I cannot hope to know your business, its legal and ethical constraints, and what has been tried already. I can, however, give examples of approaches—some coming from other settings-- that may ultimately reduce cost per

voucher by cost and savings sharing. Frankly I hope and expect you've done many of them already, but I want to spark more thinking:

Cost and task mapping--The first step would be to break down costs by tasks and prioritize the biggest drains on time and money. The HUD experiment may fund the analysis of many parts of your operating budget, but the capital budget would also be fair game. Mostly, this is actually best done by people in the various departments—and the users, including tenants. You could map the costs in "voucher equivalents" to prioritize the impact of reductions in each area.

Consider advertising small cash prizes for best suggestions from employees. When people are in the middle of a frustrating process, let them know they can be rewarded for detailing redesigns that drive better client service at lower cost to LMHA and tenants alike. Non- monetary recognitions and perks can also drive multiple brainstorming ideas into fruition in any organization. You may also include successes in cost eliminations in job and promotion assessments. Think about innovation teams in every department.

Utilities savings— This seems another fertile and significant area to start. I support continuation of utilities allowances in the LMHA rent calculations, but many residential properties for low-income people are "energy sieves"—causing avoidable expense to both the tenants and LMHA's program. Currently there is little incentive for landlords to invest in weatherization because costs are passed directly to LMHA and tenants. It is a poorly-kept secret in the real estate community, though, that Section 8 can be a very lucrative and low-risk program. I urge you to build financial incentives and Section 8 landlord requirements around energy demand reduction as a prerequisite for continued long-term participation in Section 8. LG&E could lead much of this because demand reduction saves them capital. Options might include:

- wrapping most or all of utilities into the rent and have the landlord pay the utilities;
- setting standard maximum utilities consumption allowances that LMHA and tenants would pay)possibly starting from the DC model) and, like emissions trading, decrease them over time;
- fixed-term rent increments or outright grants for shared investment in weatherization or efficient appliances and lighting; and
- more aggressive tenant education and weatherization training (as is done, I believe, by Project Warm)
- Supporting multi-unit sites with highly efficient central heating and fixed-maximum thermostat ranges

LG&E is always looking for demand-side reductions because it can reduce their need for large capital projects. Right now, though, there is little incentive for landlords to move in that direction. Tenants and LMHA end up paying for this impasse. There is a way for a win for all the stakeholders here, but it will take communication and analyses from some hard detail work to see it to fruition. There is an answer out there.

Avoiding future costs and capital-- For LMHA as well as LG&E, energy efficiency investments pay out in avoided costs over time. Requiring some level of sustainability investments in Section 8 units' systems and materials would likewise reduce maintenance. The Kentucky Green Building Council and the University of Louisville Sustainability Council (and Speed School Institutes) would have experience with LEED standards and other proven approaches to reduce energy and impact construction materials' cost and reliability. Large local housing nonprofits are also gaining experience in commercial solar energy systems and groundwater heat pumps that

they could share with other Section 8 multi-unit landlords. This information—along with grants or low-interest loans—could be another source of cost savings for LMHA.

It could also be an opportunity for tenant job training and shared landlord savings if several similar landlord-originated projects were combined into one contract with a LMHA vendor. This type of landlord participation requirement would be phased in as tenants move out and new tenant/landlord/LMHA agreements are established. Those landlords who participate could be given some priority in selection for additional units.

Smoke-free housing—LMHA has apparently already partnered with the Metro Health Department to move its residential buildings to smoke-free status. The program apparently used small incentives (from grants) to tenants.

Given that nonsmoking units do not require as much painting and cleaning as housing units occupied by smokers, Section 8 landlords have a vested interest in LMHA 's tenants going smoke-free. The estimated savings ("cost avoidance"--estimated by the landlord and LMHA, but comparable to savings realized in the LMHA buildings) should be shared equally by LMHA and the landlord by reducing the rent by half the savings to the landlord. LMHA could give a small, temporary cash incentive to existing or new tenants who agree to go smoke-free, but that incentive would end and the unit would be available in the future only as a smoke free rental.

LEGAL AID SOCIETY

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JEFFREY A. BEEN

(502) 614-3100

RECEIVED
JUL 01 2014
EXECUTIVE

Tim Barry
Executive Director
Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203

RE: LMHA's Proposed Changes to the Administrative Plan and Moving to Work Activity: Alternative Rent Policies for Housing Choice Voucher Program

Thank you for the opportunity to comment on LMHA's proposed Moving to Work (MTW) Activity: Alternative Rent Policies for Housing Choice Voucher Program. The LMHA is charged with providing government-funded housing assistance to those in our community who lack financial resources and whose circumstances make them eligible for this assistance. The proposed MTW activity governs the process by which these individuals are determined eligible for program assistance and by which continued eligibility is measured. This proposed activity will govern the ability of low income individuals in our community to access and receive housing assistance when they have no other reasonable options to secure shelter for themselves and their family.

The Legal Aid Society has reviewed the proposed activity in light of the community's charge to LMHA. As you know, we have worked with LMHA over the years to ensure that the procedures adopted or implemented by LMHA are sensitively crafted and that every participant is given a full and fair opportunity to access housing assistance. The proposed activity implements changes in policy that may adversely affect some participants and jeopardize their housing through an increased chance of eviction.

We detail our reservations about these changes below:

- *The calculation of a tenant's annual income does not allow for a child care deduction which may cause some tenants to pay a higher monthly rent and may discourage some tenants from seeking employment.*

The Administrative Plan Addendum provides for calculating a tenant's average monthly income and ultimately, the tenant's total rent payment without allowing a deduction for child care expenses. The plan does allow for a one time deduction for child care expenses in excess of

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$200 per month at the initial certification, however, the reduced tenant payment expires after six months. As a result the tenant will have a higher rent payment after six months. The higher rent payment coupled with increased child care expenses increase the cost of employment to the tenant and may discourage some tenants from seeking employment that will require them to pay childcare.

- *The minimum rent requirement may create a hardship for some tenants.*

The LMHA has set the minimum rent at $75.00 per month. Since tenant income is generally set at 28% of a tenant's average monthly income, tenants assigned the minimum rent of $75.00 will necessarily be the tenants with the lowest monthly income. The income of low-income individuals is subject to frequent change. Employment may be seasonal or depend on weather conditions. Work hours often fluctuate. A tenant's income will likely change from week to week and from month to month. For these tenants with the lowest income levels, the minimum rent may often be difficult or impossible to pay, forcing them to rely on a hardship waiver system that is not properly equipped to prevent an eviction of the tenant.

- *The system for requesting and receiving a hardship waiver is too cumbersome to prevent a tenant from being evicted from the rental property.*

The Administrative Plan allows a tenant who has experienced a financial hardship or loss of income to request a hardship waiver. Among other things, if granted, the waiver may lower a tenant's total monthly payment or waive the minimum rent entirely for 180 days. A tenant must request a hardship review by completing a written hardship waiver and provide proof of the hardship. Proof of the hardship includes documentation of loss of employment, a decrease in work hours, proof of the death or incapacitation of an income-earning household member or a copy of a written 7-day notice of eviction. Upon receipt of these documents the LMHA will consider granting the hardship waiver. If the waiver is denied the tenant may file an appeal.

Tenants will seek hardship waivers when they are unable to pay the monthly rent and they are facing termination of the lease and eviction by the landlord. Evictions are expedited court proceedings designed to return possession of rental properties to landlords in a short period of time. Eviction hearings typically take place 30 to 45 days after the filing of an eviction petition. When a tenant fails to pay rent, K.R.S. 383.360(2) requires a landlord to provide a written notice to the tenant that the lease will terminate if the rent is not paid in seven (7) days. During this seven day period the tenant has an absolute right to pay the rent. If the rent is offered the

landlord must accept it. After seven days the landlord is not required to accept the rent and may evict the tenant even if the is then able to pay.

The written 7-day notice is one of the documents required to request a hardship waiver. LMHA must process the hardship request and tender payment of the deficient rent to the landlord within the seven day period to ensure an eviction is not filed against the tenant. If payment is not tendered to the landlord within this seven day period, the landlord may terminate the lease and evict the tenant regardless of LMHA's intention to grant a waiver and pay the deficient rent. Even in instances where the tenant may experience a decrease in income and request a waiver before receiving a 7-day notice, the waiver process is too burdensome and time consuming to reasonably allow LMHA to process a waiver request and issue payment to the landlord before the landlord files an eviction.

The waiver process should be expedited to match expedited eviction proceedings. LMHA should also consider adding language to the HAP contract prohibiting landlords from filing evictions while a hardship waiver is being considered by LMHA. Without these protections LMHA may see many leases terminated when the intention of LMHA was to grant a hardship waiver.

We ask LMHA to address these specific concerns before adopting the proposed Addendums to the Administrative Plan. These suggestions are the product of a review of the proposed changes by our staff attorneys who daily address the issues raised by the tenancy relationship LMHA has with its many participants in its housing programs.

We would welcome the opportunity to work with your staff in crafting language that will appropriately address these concerns and help ensure that families do not lose housing unnecessarily.

Sincerely,

Jeffrey A. Been
Executive Director

S. Stewart Pope
Advocacy Director

Carol J. Kraemer
1936 Payne St.
Louisville, KY 40206
502-387-1131
cjkraemer1936@gmail.com

RECEIVED
JUL 07 2014
EXECUTIVE

Tim Barry
Executive Director
Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203

July 2, 2014

Dear Mr. Barry,

The Louisville Metro Housing Authority plays a critical role in providing affordable housing for those most in need in our community.

In large part due to that role, it is deeply troubling that you have agreed to Louisville participation in the Housing and Urban Development rent reform study.

It is nothing less than shocking that LMHA would agree to an experiment that overwhelmingly impacts poor Black single mothers. The race, gender and class implications of this study are deeply disturbing.

The women subjected to the study have no right to opt out.
As was pointed out at the June 4 LMHA public hearing, and again in comments in the press coverage by LEO newspaper, it is unethical to conduct experiments on human beings without their consent.

Several particulars of the study are extremely problematic. Among these, the minimum rent payment creates an unfair burden on families already deeply marginalized economically. Elimination of deductions and allowances for childcare threatens to put children in tenuous and potentially dangerous situations when mothers cannot cover safe and adequate services for their young ones. While the rent reform study provides a "hardship policy", the procedure is cumbersome and only provides a very temporary relief.

Other cities have decided not to participate in this experiment on our society's most vulnerable people. This is not surprising.

In the two public hearings held by LMHA addressing this study, there was overwhelming opposition by housing advocates, and especially on the part of the mothers who will be most impacted by this decision. At each of these hearings the room was full of Black mothers. Upon learning of this study at the June 4 hearing, some literally pleaded with LMHA not to make them do this.

We urge you to reconsider LMHA's participation in the rent reform study. Our community's most marginalized, LMHA's history, and our community's commitment to compassion deserve better than this.

For justice,

Carol J. Kraemer
Co-convener
Louisville Showing Up for Racial Justice

Adam Hall
910 S Shelby Street
Louisville, KY 40203

Wednesday, July 09, 2014

Sarah Laster
Louisville Metro Housing Authority
420 S 8th Street
Louisville, KY 40203

Dear Ms. Laster:

I am writing today regarding the proposed "Rent Reform Study," in which human beings will be used as test subjects without their explicit informed consent. When I first learned about this study, I was, and still am, truly appalled the Housing Authority would treat residents with such disregard.

But what I find even more distressing, is eliminating the deduction for child care in the income calculation for residents chosen to be part of this test. There is significant research to support the link between high quality, early childhood education to academic achievement and educational success. If we hope to end the intergenerational cycle of poverty, we need to prepare young people to be the best students possible so they can excel and be positioned to compete in the modern work force.

This project seems to me to be yet another attempt to treat poor, single mothers as pariah - while they may not be branded with a scarlet letter, the psychological effect of stunts like this are just as damaging. The basis of the experiment seems to me to begin with the notion "these people" are lazy, and in order to get them to work, you have to use punishments and threats. The reality is, many people who are low skilled workers are finding it difficult if not impossible to find work in today's economy. Even skilled workers and professionals are now competing for lower paying jobs, exacerbating the challenges low skilled workers have in finding work.

I would argue the time, money and energy which will be spent on this experiment could be redirected to providing support, resources and training to help move low skilled workers to a more competitive advantage in the labor market. And do this work in a manner which is encouraging and not judgmental or demeaning. In my professional and volunteer work, I encounter many people who feel they have been tossed way and are worthless. I even encounter children who have those same feelings of hopelessness! We can ill afford to discard anyone. Please look at this proposed experiment through a lens of compassion, and I would guess it would not move forward.

Sincerely,

Adam Hall

Sarah Laster <sarah.laster@gmail.com>

"Experiment"

John C. Birkimer <jcbirk01@exchange.louisville.edu> Wed, Jul 9, 2014 at 7:55 AM
To: sarah.laster@gmail.com

Dirty trick on poor.

Sent from my T-Mobile 4G LTE Device

Sarah Laster <sarah.laster@gmail.com>

Public Comment- HUD Study

Chad Stratton <chadwickstratton@gmail.com> Wed, Jul 9, 2014 at 9:40 AM
To: sarah.laster@gmail.com

I am disgusted that my city is seeking to experiment on vulnerable people without their consent. I am fiercely opposed to inflicting more hardship on poor people out of curiosity. Please document how revolted I, a Louisville citizen, am about my city even considering this garbage.

Chad Stratton
53 Winifrede Ln.
Louisville, KY 40206

Gmail

Sarah Laster <sarah.laster@gmail.com>

opposition to "rent reform" study

Christopher,Karen Lyn <k.christopher@louisville.edu> Wed, Jul 9, 2014 at 10:19 AM
To: "sarah.laster@gmail.com" <sarah.laster@gmail.com>

Dear Ms. Laster,

I write to express my strong opposition to the "rent reform" study currently under consideration for Section 8 clients.

As someone who conducts social research on disadvantaged populations, I am opposed to this study for several reasons. First, this study clearly violates the primary tenet in research ethnics: do no direct harm to study participants. As I'm sure you know, raising the rent of Section 8 clients by $75/month can surely do harm to these clients (primary women and their children), leading to more problems paying bills, more hungry mothers and children, more untreated health problems, and greater psychological stress.

Second, conducting any research study without providing "informed consent" and allowing participants to choose not to participate is also deeply unethical. I understand Section 8 clients can apply for a "waiver" to not participate in the study -- but this process seems quite onerous for participants. They should be informed of every apsect of the study and able to simply check a box and say they do not want to participate -- this type of informed consent is required for virtually every research study conducted in universities. I understand that these women receive aid through Section 8 -- but that should not take away from the fact that they deserved to be treated as autonomous people with the right to not participate in research trials. As you probably know, before reserach ethnics boards were created to oversee research in universities, people (especially socially disadvantaged groups) were treated in quite inhumane ways, and any study that refuses to let people choose whether or not to participate in research -- or makes opting out of research quite difficult as is the case in the "rent reform" study -- risks further harm to disadvantaged populations.

For these reasons, this "rent reform" study would never be allowed to take place at any university where I've worked, and I strongly urge you and those in metro government not to take part in it.

While I am currently employed at University of Louisville, my views on this matter are my own and do not represent the university. If you would like to disucss this matter in more detail, I would be happy to do so. (I teach graduate-level classes in Research Methods at UofL.)

Sincerely,

Dr. Karen Christopher

Associate Professor of Sociology and Women's and Gender Studies

University of Louisville

502-852-8160

k.christopher@louisville.edu

Gmail by Google

Sarah Laster <sarah.laster@gmail.com>

Rent Reform Study; renters must volunteer, not be conscripted

kate cunningham <kate.cunningham9@gmail.com> Wed, Jul 9, 2014 at 5:27 PM
To: sarah.laster@gmail.com

Ms. Laster,

I am an affordable housing advocate and have volunteered, one day a week, with Habitat for Humanity, since 1996. I read with interest Mariam Williams' op ed in the Courier Journal today. I do not know Mariam personally but concur with her in the views expressed. This rent reform study must include only participants who have volunteered for the study. It is high-handed, to say the least, to dictate, unilaterally, new rental terms for some Section 8 participants.

I have also personally assisted, this year, a family from Congo, whose sole wage earner was injured in a car crash, to the extent that she could no longer work. She has five dependents in high school. She is not on Section 8 but it requires no imagination to think that other Section 8 participants are in equally dire economic situations. LMHA should be increasing its flexibility for Section 8 participants, not introducing stringent new rules designed for administrative ease, rather than compassionate assistance to families.
Thank you for including my views in the public comment record.
Sincerely,
Kate Cunningham
8606 Whipps Bend Rd
Louisville KY 40222

Gmail by Google

Sarah Laster <sarah.laster@gmail.com>

Section 8 Housing Experiment

pigbimpin316 <pigbimpin316@gmail.com> Wed, Jul 9, 2014 at 10:00 PM
To: sarah.laster@gmail.com

I recently read an article about the "experimentation" of the Louisville Metro Housing Authority on Section 8 recipients. The article I read was against the experiment. Their logic seems to be based on the belief that this "experiment" is driven by stereotypes of the African American female. I believe this to be untrue.

I, too, live in an area with many men, and women, African American, as well as Caucasian, that depend on Section 8 and other forms of Government assistance.

I believe that these programs aimed to help struggling families are abused by many. I truly hope that your efforts help to uncover a way to rid people of their dependency on such programs.

The only purpose of this email is to give you my support. I am sure that the studies implemented are not racially or stereotypically driven, and I hope that the people in your community will eventually realize that your efforts are to help the majority, not hinder a minority.

Best of luck to you and the Loisville Metro Housing Authority.
Sincerely, Kenneth

Gmail by Google

Sarah Laster <sarah.laster@gmail.com>

research ethics of section 8 rent reform study

Kolers,Avery Harman <avery.kolers@louisville.edu> Thu, Jul 10, 2014 at 7:07 AM
To: "sarah.laster@gmail.com" <sarah.laster@gmail.com>
Cc: "Kolers,Avery Harman" <avery.kolers@louisville.edu>

Dear Ms. Laster,
I was surprised and disturbed to read the details of the HUD/LMHA study on new procedures and requirements for Section 8 housing vouchers.
Two basic tenets of research ethics are 1) that all research participants be selected by voluntary informed consent, and 2) that no participant be made materially worse off for having participated. Typically these two requirements are regulated by submitting studies to Institutional Review Boards for approval and, when studies are performed on marginalized populations, by involving those populations in the design and implementation of the research.
It seems to me that the proposed study violates each of these tenets.

1) Voluntary Informed Consent. I recognize that opt-outs are sometimes easier to administer than opt-ins, and that they can enhance the validity of studies by increasing participation and decreasing selection bias. However, when opt-outs are used, they render everyone's participation in the study, if not involuntary (i.e., opposed), then at any rate nonvoluntary (unchosen). And hence an opt-out model raises obvious concerns for the Voluntary Informed Consent requirement. To overcome these concerns, two things are required: first, that **the opt-out process not itself be a hardship**, and second, that the study go even further to ensure satisfaction of the 2nd basic tenet, namely **that participation does not make anyone materially worse-off**.

On the first requirement, the hardship "opt-out" proposed by the study is a four-step, documentation-intensive process that can be initiated by the tenant only under conditions of significant stress, i.e. a 7-day eviction notice and/or utility cutoff, and which leaves the tenant's fate in the hands of others, namely an LMHA review board. It seems to me that this makes **the opt-out process a hardship in itself**. The appropriate opt-out would be a simple check-box.
Regarding the second requirement, let me just turn to basic tenet number (2).

2) None Materially Worse-Off. Ethical concern about placebo trials has generated the requirement of **equipoise**, which entails that every research participant be at least as well off as the current best practice would make them. So for instance if we are testing a drug for influenza, we do not put the control group on a placebo, we put the control group on flumist or whatever is the best current treatment, and expose the study group (under conditions of voluntary informed consent!) to the drug under study. Even this division is to persist only so long as it is genuinely unknown which is the better treatment; hence some studies (such as, famously, the hormone replacement study several years ago) are ended early when researchers are no longer in doubt about the results and it becomes unethical to continue with a worse or ineffective treatment.

It seems to me that **the HUD/LMHA study violates the principle of equipoise**. Indeed the nature of the study is to make its treatment group materially worse off, in at least one immediate and costly respect, in hopes that they will respond differently to a $75/28% TTP minimum than they do to a $0 TTP minimum. That is, so far from meeting requirement (2) -- still less in the enhanced form required by the violation of (1) -- the study works by making its treatment group materially worse off, and doing so is of the essence of the study. That very fact is astonishing in 2014.

If such a study is to go forward it should be redesigned so that i) participation is made genuinely voluntary rather than nonvoluntary or involuntary; or at least, ii) if it is nonvoluntary, the opt-out procedure is less onerous and less stressful, such as a simple check-box; and iii) no participant, be they assigned to the control group or the treatment group, be made materially worse-off by the study. It seems to me that the hoped-for effects of the

$75/28% TTP minimum could be measured without changing benefits but by paying those benefits to clients directly, and having them pay rent to the landlord. Since the effect can be measured in this way which makes clients materially no worse off, then there is no justification for any measurement that works by increasing the TTP.

Quite apart from these substantive suggestions about how to make the study compatible with basic research ethics, the study should be submitted to an Institutional Review Board for approval and should be changed as the IRB requires. And of course, the study should be developed in conversation with, and in a way that empowers, the study participants, rather than imposed on them from above.

Thank you very much for your attention to these concerns. I hope that HUD and the LMHA will adhere to research ethics and cancel this study or revise it as required.

Sincerely,
Avery Kolers
1921 Deerwood Ave.
Louisville, KY 40205

Philosophy Department
University of Louisville
Louisville, KY 40292
502-852-0453 | http://louisville.edu/faculty/ahkole01

Sarah Laster <sarah.laster@gmail.com>

FW: HUD experiment

Sarah Laster <slaster@lmha1.org> Thu, Jul 10, 2014 at 8:44 AM
To: "Sarah.laster@gmail.com" <Sarah.laster@gmail.com>

From: Marshall Shelor [mshelor@bellsouth.net]
Sent: Wednesday, July 09, 2014 7:53 AM
To: Sarah Laster
Subject: HUD experiment

I support the rent adjustment program.

Gmail by Google

Sarah Laster <sarah.laster@gmail.com>

Housing authority response

michyh <michyh@bellsouth.net> Thu, Jul 10, 2014 at 9:27 AM
Reply-To: michyh <michyh@bellsouth.net>
To: "sarah.laster@gmail.com" <sarah.laster@gmail.com>

To whom it might concern:

I am writing to express myself regarding the most recent proposal for research by the Housing Authority.

As a local educator- both in JCPS classroom and in community colleges training future educators- I am in constant contact with the CHILDREN of those who live in poverty, including housing such as that being proposed in this "research." I question its research integrity as it does not follow any of the protocol or due process insisted upon by our own school district and universities. I question its impact on the children of those families required to participate. I question its adherence to principles of democracy and inclusive decision making. It is well understood that empowerment only comes when those most effected by decisions have the most input in their formation. Thus, how then can this be about raising up the lives of these families? And if it is not about that, what is its purpose?

My own soul's "bottom line" is the children who will live with this legacy. What are we telling them?
I believe the answer to that is unacceptable and I would ask that those involved consider other humane ways to work with the needs they have in terms of documentation and outcome evaluations.

Sincerely,
Michele Hemenway
We must simply be who we want our children to become.

Michele Hemenway
2032 Lakeside Drive
Louisville KY

40205
(502)295-5155

Gmail by Google

Sarah Laster <sarah.laster@gmail.com>

Public Comment on Rent Reform Study

Griffin,Jo Ann <ja.griffin@louisville.edu> Thu, Jul 10, 2014 at 10:17 AM
To: "sarah.laster@gmail.com" <sarah.laster@gmail.com>

Dear Ms. Laster,

As I am sure you will hear from local academics, the "Rent Reform Study" is exactly the kind of "research" we are all prohibited from engaging in by common sense and by rigorous policies monitored by our institutions' Institutional Review Boards (IRB). The reasons for prohibiting such studies are well-established and reflect serious ethical concerns.

Such studies are coercive. For this reason, research is prohibited on populations such as prisoners whose abilities to opt out are severely limited. Such is the nature of the proposed Rent Reform Study. Residents dependent on Section 8 subsidies do not have the same freedom of movement in the housing market as the general population.

Such studies prey upon disadvantaged populations, making them akin to rats in a maze. Such positioning dehumanizes and devalues the individuals involved.

Such studies provide no identifiable benefit to the participants and do open the possibility for doing the participants harm. The identifiable harms to participants in the Rent Reform Study include

- possible eviction or shutting off of utilities, if the individual does not manage to negotiate the paperwork necessary to end participation in the study; if one works a low-wage job and depends upon public transportation, there is a significant burden involved in gathering, completing and delivering the required paperwork in a timely manner.
- The inevitable stress involved in the situation described just above.

In addition, these harms will disproportionately affect women of color, a population already socially, culturally and economically disadvantaged. This fact makes IRB committees hyper-vigilant in restricting research with such populations unless there is:

- informed consent
- Identifiable benefits to participants
- Strict safeguarding and de-indentification of the data that results from such a study

If all of these reasons are not sufficient to deter participation in the proposed study, it may also be worth considering the degree to which this proposal evinces cultural insensitivity and a profound lack of political awareness. To members of the African-American community, this study and the manner in which it is proposed will resonate with the Tuskegee syphilis study and with the use of Henrietta Lacks's cancer cells without her knowledge. It does not matter that a rent study is not physically invasive. The forced participation without informed consent will feel the same. These are not associations local (or national) government officials would wish to encourage in any segment of its voting population.

I hope local officials will decide it is unwise to participate in the proposed Rent Reform Study.

Jo Ann Griffin, Ph.D.
Instructor
Women's and Gender Studies

University of Louisville

Louisville Metro Human Relations Commission
ADVOCACY BOARD

Reginald Q. Glass, Chair
Sherman L. Bush
Aukram Burton
Angelica Matos
Heather Williams
Dawn Wilson

July 11, 2014

Sarah Laster
Louisville Metro Housing Authority
via email sarah.laster@gmail.com

This letter is in response to the Louisville Metro Housing Authority Administrative Plan Addendum Rent Reform Study. The Louisville Metro Human Relations Commission's Advocacy Board is concerned with any program that appears to target, intentionally or unintentionally, a specific class of individuals, in this case, non-disabled, non-elderly families. While this may be facially non-discriminatory, the fact that the great majority of those receiving household assistance are women with children, and the majority of those are women of color, leads to the conclusion that two protected classes are being selected for inclusion in this study with no opportunity to opt out.

We urge you to consider less impactful means of conducting this study and provide support services to those who volunteer to participate in it. Thank you for your consideration.

Sincerely,

Reginald Q. Glass

Reginald Q. Glass
Chair, Advocacy Board

Sarah Laster <sarah.laster@gmail.com>

FW: Please Reconsider Participation in Rent Reform Study

Sarah Laster <slaster@lmha1.org> Fri, Jul 11, 2014 at 3:04 PM
To: "Sarah.laster@gmail.com" <Sarah.laster@gmail.com>

From: Katie Holmes [katiesnowholmes@hotmail.com]
Sent: Friday, July 11, 2014 10:44 AM
To: Sarah Laster
Subject: Please Reconsider Participation in Rent Reform Study

Dear Ms. Laster,

I am writing to urge LMHA to reconsider its decision to take part in the HUD study on Housing Choice Vouchers. I have several issues with this study, including that participants in it will not have the right to opt-out. It also is problematic that a minimum rent payment of $75 will be enacted instead of no minimum. Further, child care deductions should not be taken away, which is a risk of this study. I strongly urge LMHA not to take part in this study, which will disproportionately affect low income black women in our community.

Sincerely,
Kathryn Holmes
915 Schiller Avenue
Louisville, KY 40204

400 S. 8th, #1411

Louisville, Ky 40203

July 22, 2014

RECEIVED
JUL 28 2014
EXECUTIVE

The Greater Louisville Housing Authority

400 S. 8th

Louisville, Ky 40203

Re: Public Comments to Proposed Changes Moving To Work and Rent Reform

Dear Sirs:

The recent studies shared with me by Mr. Barry dated in a letter of July 2, 2014 are troubling and fraught with a logic that does not make sense nor affords the citizens to realize in an effective manner an income of worth.

First, the principle of informed consent was not practiced nor honored by our Congress as it can and should relate to the customers, the Citizens who occupy Avenue Plaza and who also use the Voucher Program.

In housing programs there should be a robust option for not just potential employment but also job creation. In Vocational Rehabilitation, this option is in the policy. However, the requisite skillsets are not effectively present in the programming nor present in the minds of our business and political leaders. If one experiences a disability, the skills necessary to realize net incomes in the face of subtle and not so subtle patterns of discrimination tax us in a demeaning way.

Hence, by what methodology do these documents even begin to realize a foundation on "fair market values" for rental property, when the very nature of our community's business practices have resulted in creating an island of low or no income? All housing is public, though business practices sometimes operate in the dark.

Will the rapid increase of rental rates combine with the staid business development practices to assure increase stress and turmoil in the "fair labor market?" Perhaps a first step towards a more robust housing future would be to have term limits on the Metro Housing Board?

Sincerely,

William J. Wells

C: Courier-Journal

MARI MUJICA
P.O.Box 1554, Shelbyville, KY 40066

RECEIVED
AUG 01 2014
EXECUTIVE

Tim Barry
Executive Director
Louisville Metro Housing Authority
420 South Eighth Street
Louisville, Kentucky 40203

July 29, 2014

Dear Mr. Barry,

I want to add my voice to the many voices of black mothers and housing advocates who are urging you as Executive director of the Louisville Metro Housing Authority to refuse participation in the Housing and Urban Development rent reform study currently under consideration for Louisville.

As a citizen and business woman committed to building *a more creative, inclusive, and compassionate world*, I find the proposal problematic at best and dangerously divisive and harmful at worst. In a city where inequity informs access to affordable housing and where housing regulations have historically created inequality, I, see the Louisville Metro Housing Authority as a beacon of hope playing a critical role to provide affordable housing for those who are most vulnerable and most in need.

The proposed Housing and Urban Development rent reform study, will further chastise black poor women and their children. It will hurt a population that is already unjustly impacted by poverty, sexism and racism. Proposed actions like establishing minimum rent payments and taking away childcare allowances for mothers who are already struggling, are initiatives far from the characteristics of a compassionate city. Instead they seem to be informed by assumptions about poor black mothers which only justify and entrench their discrimination.

Moreover, the fact that this "research" will be conducted without the informed consent of those who participate in it, and that women selected for the study would not have the opportunity to decline participating, makes this research not only highly unethical but possibly illegal.

I urge you and your team to carefully explore the assumptions on which the study is based, the harmful elements of the study, and reconsider Louisville's participation.

Thank you for your attention,

Mari Mujica
Diverse Collaborations

diversity@marimujica.com • 502.693.6063 • www.marimujica.com

August 19, 2014

Chad Stratton
chadwickstratton@gmail.com

Dear Mr. Stratton:

Thank you for email received on July 9, 2014 regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority's (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. Your comments and this letter of response will be included within the MTW Annual Plan submission.

1. *In your email you express your disgust that Louisville is seeking to experiment on vulnerable people without their consent.*

   The Louisville Metro Housing Authority thanks you for your comment and has taken it under consideration. In response to public comment, the Housing Authority has proposed a modified Rent Reform Study. A summary of the modifications is following.

   - Household Choice with "Opt-out": All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households assigned to the alternative rent policy group will have 30 days to notify LMHA of their decision to opt-out.

     LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate.

     Opting-out gives the household choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt out within 30 days.

   - Alternative Rent Policy modifications to address local concerns:

     - Reduce the minimum rent to $50.

     - Exclude households with a current child care deduction from the eligible group.

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- Procedures, including a protocol for an expedited waiver process that is considerate of the 7-day notice of eviction, for implementing the hardship policy.

- Expanded and augmented wrap-around self-sufficiency services. Services will be available to households in the alternative policy group and the existing policy group.

Thank you again for your input and for participating in this process. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL

August 20, 2014

Kenneth
Pigbimpin316@gmail.com

Dear Kenneth:

Thank you for email received on July 9, 2014 regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. Your comments and this letter of response will be included within the MTW Annual Plan submission to the U.S. Department of Housing and Urban Development (HUD).

1. *In your email you express support for LMHA's efforts to uncover a way to help families become self-sufficient.*

   The Louisville Metro Housing Authority thanks you for your comment and has taken it under consideration.

LMHA appreciates your input and for participating in this process. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL

420 South Eighth Street | Louisville, KY 40203 | 502 569.3400 | Fax 502 569.3459

August 20, 2014

Marshall Shelor
chadwickstratton@gmail.com

Dear Mr. Shelor:

Thank you for email received on July 10, 2014 regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. Your comments and this letter of response will be included within the MTW Annual Plan submission to the U.S. Department of Housing and Urban Development (HUD).

1. *In your email you express support for LMHA's rent adjustment program.*

   The Louisville Metro Housing Authority thanks you for your comment and has taken it under consideration.

Thank you again for your input and for participating in this process. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL

420 South Eighth Street | Louisville, KY 40203 | 502 569.3400 | Fax 502 569.3459

August 19, 2014

John Birkimer
Jcbirk01@exchange.louisville.edu

Dear Mr. Birkimer:

Thank you for email received on July 9, 2014 regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority's DRAFT 2014-2015 Annual Moving To Work (MTW) Plan. Your comments and this letter of response will be included within the Annual MTW Plan submission.

1. *In your email you state that the "experiment" is a "dirty trick on the poor".*

   The Louisville Metro Housing Authority thanks you for your comment and has taken it under consideration. In response to public comment, the Housing Authority has proposed a modified Rent Reform Study. A summary of the modifications is following.

   - Household Choice with "Opt-out": All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households assigned to the alternative rent policy group will have 30 days to notify LMHA of their decision to opt-out.

     LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate.

     Opting-out gives the household choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt out within 30 days.

   - Alternative Rent Policy modifications to address local concerns:

     - Reduce the minimum rent to $50.

     - Exclude households with a current child care deduction from the eligible group.

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- Procedures, including a protocol for an expedited waiver process that is considerate of the 7-day notice of eviction, for implementing the hardship policy.

- Expanded and augmented wrap-around self-sufficiency services. Services will be available to households in the alternative rent policy group and the existing rent policy group.

Thank you again for your input and for participating in this process. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL

August 20, 2014

Catherine Fosl, PhD, Director
Anne Braden Institute for Social Justice Research
College of Arts and Sciences
University of Louisville
Louisville, KY 40292

Dear Dr. ~~Fosl~~: Cate

Thank you for letter regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. We appreciate your interest and your strong commitment to affordable housing within this community. Your comments and this letter of response will be included within the MTW Annual Plan submission to the U.S. Department of Housing and Urban Development.

1. *You expressed concerns about the goals of the study, stating that the primary thrust of this demonstration is increased deregulation of housing agencies, while increased household self-sufficiency is a hoped-for but secondary goal.*

   LMHA is one of nearly 40 Moving To Work (MTW) Public Housing Agencies. Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-34), created the MTW Demonstration Program, and LMHA has maintained its MTW designation since 1999. The MTW Demonstration is an extraordinary attempt in public policy that takes an innovative approach in the development of solutions to the issues surrounding low-income housing. Like so many housing and service providers, housing Authorities nationwide are being asked to do more, or at the very least maintain the status quo, under increasingly dismal fiscal conditions.

   Under their agreements with HUD, MTW housing agencies, like LMHA, are expected to design various approaches, including new rent policies, for providing and administering housing assistance and to assess the effectiveness of those approaches. Other MTW housing authorities have instituted changes in their rent policies system-wide before testing them, which is permitted under MTW regulations, provided the changes meet at least one of the 3 Moving to Work objectives: 1) Achieve greater cost effectiveness in federal expenditures; 2) Incentivize families to become economically self-sufficient; and, 3) Increase housing choices for low-income families.

   Based on the MDRC impact analysis, LMHA anticipates the alternative rent policy the Housing Authority will implement as part of the Rent Reform Study will be advantageous for most tenants who are assigned to the alternative policy, particularly because if they increase their earnings during the period before their triennial recertification, their share of rent will *not* increase (as it would under current policy). At

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the same time, the Housing Authority believes that it is prudent to adopt this policy on a trial basis and to learn from a careful evaluation whether the policy achieves the benefits for tenants and the housing authority that are expected. Trying out the new policy in a pilot study before adopting the policy system-wide is a responsible way to execute the Housing Authority's duties as a steward of public funds and as an agency that assists economically vulnerable families.

The Housing Authority believes that Congress is likely to make changes in rent policies in the future. LMHA wants those reforms to be informed by strong evidence about what works, and what doesn't work, because any national legislation will affect local families.

2. *You also expressed concern about the proposal's contents, more specifically about the following "implicit assumption": The notion that poor families do not want to work, and that work is readily available for those who seek it hard enough. You go on to state that if causation was clearly established between higher subsidized rents and workforce participation, then a case could be made for implementing the policy locally.*

No such assumption has been made by either LMHA or the Study commissioned by HUD. The new rent policy does not force anyone to work or to increase their earnings. The new rent policy does not include a work requirement. However, we recognize that tenants may go to work over time. Under the new policy, those who do so, as well as those who are already working and are able to increase their earnings will get to keep more of their extra earnings because, in contrast to current rules, their portion of the rent (called Total Tenant Payment, or "TTP") will not increase during three years until their next triennial income recertification. Normally, when tenants earnings increase, their portion of their rent goes up. This will not happen under the new rent policy during the three years between recertifications.

3. *In addition, you caution the Housing Authority about implementing an alternative rent policy that will, on the majority, affect African-American women with children who, as you say, are about to be shepherded into it without opportunity for informed consent.*

LMHA has been requested to participate as part of a national Rent Reform Study commissioned by the US Department of Housing and Urban Development (HUD) that is being conducted at several Housing Choice Voucher (HCV) program sites across the country. The racial and ethnic composition of tenants will generally reflect the composition of each participating housing agency's MTW HCV population. The Study excludes both Elderly and Disabled households because the study is testing a set of reforms that are intended to make work more economically beneficial for most tenants who go to work or increase their earnings. This issue is more germane to work-able, non-elderly households.

During the period of the study, the new rent policy is intended to provide the same amount of aggregate housing subsidy to households as they would normally receive under the existing rent policy. The evaluation will determine whether this goal is achieved. It is possible that the new rent policy group will end up receiving more in total subsidies than the current rent policy group. However, if it receives less in aggregate

(because earnings have increased, requiring lower average subsidies), this finding would suggest that the new rent policy would make it feasible to serve more households in need of housing assistance.

As part of the Study, households eligible for the new policy will be randomly selected for either a group that will have its rent portions calculated according to the new rules or a group that will continue to have its rents calculated under the existing rules. The original Study proposal specified that tenants selected for the new rent policy cannot opt out of the policy, and those not selected for it cannot opt into it. While this is in keeping with the authority that MTW housing agencies have as part of their agreement with HUD to test innovative rent policies, LMHA has altered the Study to include a modified policy with household choice to "opt-out". All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households selected for the alternative rent policy group will have 30 days to notify LMHA of their decision to opt-out.

LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate. Opting-out gives the household choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt-out within 30 days.

Also, this study is being conducted by the reputable and national firm, MDRC. The research strategy described above was reviewed by MDRC's Internal Review Board (IRB) as well as by HUD officials to ensure compliance with the federal Privacy Act and standard guidelines for protecting human subjects. Families who object to their data being shared with external researchers in non-aggregate form will be allowed to opt out of that part of the Study.

4. *You also cite the cutbacks in public housing assistance for families considered by policymakers as the "hard to house", including a net loss of multi-bedroom units under HOPE VI, and express concern that the proposed $75.00 minimum rent will, once again, negatively impact these families.*

LMHA has noted the growing concern for the loss of multi-bedroom units due to local efforts to redevelop and revitalize severely distressed public housing developments. LMHA, as well as many other Public Housing Agencies across the nation, are firmly committed to eradicating the large, often problem-plagued, family public housing sites constructed during the early to mid-20th century. While these sites served a much needed purpose for many years, policy changes and shifting demographics have resulted in drastically different living environments for lower-income families than what was originally envisioned.

You are correct in stating that the community did experience a net loss of public housing units (including multiple 5- and 6-bedroom units) from the Park DuValle HOPE VI Revitalization in the 1990s. Since that time, however, LMHA has pledged one-for-one

replacement of the Clarksdale units, as well as one-for-one replacement of public housing units demolished as part of the Sheppard Square HOPE VI Revitalization. Also, LMHA has pledged one-for-one replacement of the units lost during the phased demolition of Iroquois Homes, albeit this will proceed at a slower pace than what can be accomplished through a HOPE VI Revitalization effort.

Notably, replacement of the Clarksdale units was completed in 2009 through a combination of on-site new construction and off-site acquisition of move-in ready units, including single-family homes located throughout the metro area. The majority of these are two- and three- bedroom units, as the public housing waiting list demonstrates the greatest demand is for units of those sizes. When given the choice between a public housing unit and a relocation Housing Choice voucher, LMHA has found that larger HOPE VI families prefer the voucher because it allows them to select a multi-bedroom unit in an area of choice. Even so, as part of the Sheppard Square HOPE VI Revitalization, LMHA has committed to replacing the larger bedroom units that were demolished at the site, in order to serve those families who would prefer to live in public housing.

Regarding minimum rents, current HUD rules (under the 1998 housing law) allow public housing agencies to institute a $50 minimum rent (i.e., a minimum TTP) in both the Public Housing and Housing Choice Voucher programs. The inflation-adjusted value of that amount today is roughly $75. Some MTW housing authorities have instituted minimum rents as high as $150. The original $100 option was appealing because it was a mid-point in the range embraced by housing experts who have differing views on the level of an appropriate minimum rent. Furthermore, a $100 minimum rent would be approximately 9% of the monthly earnings of a full-time (35 hours/week) minimum wage job.

However, LMHA has responded to the concerns stated during the Public Comment period and has reduced the minimum rent to $50, which is the lowest minimum rent being tested among the Rent Reform Study sites and highest minimum rent permitted under current rules. This amount represents approximately 5% of the monthly earnings of a full-time minimum wage job.

Recognizing that for some families a minimum rent of even $50 could cause serious financial hardship, such families may qualify for a hardship waiver of the minimum rent, allowing them to pay less than the minimum. For example, a household with an income of $125 per month or less would be eligible for a waiver of the minimum rent, and a person with no income would likely pay no rent under the new policy.

5. *Finally, you urge the Housing Authority to decline participating in the Study, or at the least open it to further and wider discussion before proceeding with implementation of the pilot, stating that until the last month there has been little opportunity for citizen input and voucher holders.*

The Study planning team reviewed earlier drafts of the proposed Rent Reform plan with housing advocates at the Center for Budget and Policy Priorities and received substantial

feedback. The draft plan was also discussed with the National Low-Income Housing Coalition.

Subsequently, the proposed study was published locally for public comment beginning May 23, 2014 and the comment period has been extended through July 13, 2014. During that time LMHA has hosted two public hearings, both of which were well attended by residents and advocates alike. Public notice of the comment periods and the public hearings was given in the Courier-Journal and the Louisville Defender newspapers.

The Agency has also responded to requests from a number of residents for copies of the Draft 2014-2015 MTW Annual Plan, and hosted a meeting of local housing professionals, service providers, LMHA staff and the Study team.

LMHA took into consideration public and resident comments, and made changes to the Plan before approval of the Plan by the Board of Commissioners.

We look forward to working with you on this and other initiatives to address the difficult issues you touched upon in your letter. Thank you again for your participation in this process and valuable input.

Sincerely,

Tim Barry
Executive Director

TB:SL

Cate
All good with you I hope.
Please let me know if this response failed to address any of your concerns

August 20, 2014

Christina Gaines
Via cmanero@spalding.edu

Dear Ms. Gaines:

Thank you for email received on July 11, 2014 regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in the Louisville Metro Housing Authority (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. Your comments and this letter of response will be included within the MTW Annual Plan submission.

1. *In your email you state, I am writing to you today as an outraged and concerned citizen. Please understand how unethical and wrong this proposed experiment is for our community or any community. The parents who utilize section 8 do so out of many socioeconomic and geopolitical reasons. This is an unfair and criminal way to assess the information you are looking for. As a woman and a mother I am outraged. To feed off of the welfare queen stereotype and allow an already oppressive system further oppress and marginalize a group is appalling. Please do the right thing and end this. It is wrong and damaging to the people the program is meant to help and uplift.*

   LMHA Response: The Louisville Metro Housing Authority thanks you for your comment. LMHA has taken it under consideration. In response to concerns stated during the Public Comment period, LMHA has proposed a modified Rent Reform Study. A summary of the modifications is following.

   - Household Choice with "Opt-out": All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households assigned to the alternative rent policy group will have 30 days to notify LMHA of their decision to opt-out.

     LMHA will seek input from local advocates and legal aid on a process to ensure that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so the family can determine whether or not to participate.

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Opting-out gives the household choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt out within 30 days.

- Policy modifications to address local concerns:

  - Reduce the minimum rent to $50. Fifty (50) dollars is the lowest minimum rent being tested among the Rent Reform Study sites and the highest minimum rent permitted under current housing rules.

  - Exclude households with a current child care deduction from the eligible group. Households that currently use the child care deduction will remain under the existing rent policy.

- Procedures for implementing the hardship policy. Recognizing that for some families a minimum rent of $50 could cause serious financial hardship, such families may qualify for a hardship waiver of the minimum rent, allowing them to pay less than the minimum. The procedures will be developed with an eye towards expediting the waiver process for families who have received either a 7-day or 14-day notice of eviction.

- Expanded and augmented wrap-around self-sufficiency services. Services will be available to households in the alternative rent policy group and the existing policy group.

Thank you again for your input and for participating in this process. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL

August 20, 2014

Reginald Q. Glass, Chair
Advocacy Board
Louisville Metro Human Relations Commission
via email martha.lawfer@louisvilleky.gov

Dear Mr. Glass:

Thank you for letter regarding the Louisville Metro Housing Authority (LMHA) Administrative Plan Addendum Rent Reform Study. We appreciate your interest and your strong commitment to fair, affordable housing within this community. Your comments and this letter of response will be included within the Moving To Work (MTW) Annual Plan submission to the U.S. Department of Housing and Urban Development (HUD).

1. *In your letter, you wrote, the Louisville Metro Human Relations Commission's Advocacy Board is concerned with any program that appears to target, intentionally or unintentionally, a specific class of individuals, in this case non-disabled, non-elderly families. While this may be facially non-discriminatory, the fact that the great majority of those receiving household assistance are women with children, and the majority of those are women of color, leads to the conclusion that two protected classes are being selected for inclusion in this study with no opportunity to opt out.*

   LMHA Response: Under their agreements with HUD, MTW housing authorities, like LMHA, are expected to design and test innovative approaches, including new rent policies, to administering and providing housing assistance. These new policies may establish payment standards, rents or subsidy levels for voucher assistance that differ from the currently mandated program requirements in the 1937 Housing Act and its implementing regulations. MTW agencies are also authorized to adopt policies to calculate the tenant portion of the rent that differ from the current program rules; to determine contract rents and increases and to determine the content of contract rental agreements; to develop a local process to determine rent reasonableness; and to implement time limits for HCV units (vouchers) designated as part of the MTW demonstration.

   Other MTW housing agencies have instituted changes in their rent policies system-wide before testing them, and some MTW agencies have implemented changes to their rent policies that affect only a portion of the households served. This is because households

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covered by MTW typically do not select their rent policies. Both types of change are permitted under MTW regulations.

However, to address the issues touched upon in your letter, as well as other concerns stated during the Public Comment period, LMHA has proposed several modifications to the Rent Reform Study including a policy with household choice via an "opt-out" provision. All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households selected for the alternative rent policy group will have the opportunity to meet with an LMHA Housing Specialist to discuss their specific situation and have 30 days to notify LMHA of their decision to opt-out.

LMHA is committed to working with local advocates and legal aid to develop a process that ensures that families are fully informed of the potential benefits and risks of the alternative rent policy and that families achieve an understanding of the facts so they can determine whether or not to participate. Opting-out gives the households choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt-out within 30 days.

Households that object to their data being shared with external researchers in non-aggregate form will be given the opportunity to opt-out of that part of the Study as originally proposed.

In addition to household choice, LMHA has proposed to reduce the minimum rent to $50. Fifty (50) dollars is the lowest minimum rent being tested among the Rent Reform Study sites and highest minimum rent permitted under current housing rules.

Another modification would be to exclude households with a current child care deduction from being eligible to participate. Households that currently use the child care deduction will remain under the existing rent policy.

Also, LMHA will continue working with a group of local advocates and service providers to develop procedures for implementing the hardship policy. The procedures will include a protocol for an expedited waiver process that is considerate of the 7-day and 14-day notice of eviction.

Finally, LMHA has proposed expanded and augmented wrap-around self-sufficiency services for all households in the Study (i.e., in both the alternative rent policy group and the existing policy group). Some of these services would be offered in-house by LMHA case managers and others would be provided through referrals to local service providers.

2. *In closing, you wrote, we urge you to consider less impactful means of conducting this study and provide support services to those who volunteer to participate in it.*

   LMHA Response: LMHA thanks you for your comment. We have taken your comment under advisement.

We look forward to working with you on this and other initiatives. Thank you again for your participation in this process and valuable input.

Sincerely,

Tim Barry
Executive Director

TB:SL

August 22, 2014

Jeffrey A. Been, Executive Director
S. Stewart Pope, Advocacy Director
Legal Aid Society
416 W. Muhammad Ali Blvd., Suite 300
Louisville, KY 40202

Dear Mr. Been and Mr. Pope:

Thank you for letter regarding the changes proposed by Louisville Metro Housing Authority (LMHA) to the Administrative Plan and Moving to Work (MTW) Activity: Alternative Rent Policies for Housing Choice Voucher (HCV) Program. We appreciate your interest and your strong commitment to affordable housing within this community. Your comments and this letter of response will be included within the MTW Annual Plan submission to the U.S. Department of Housing and Urban Development (HUD).

You expressed concern that the proposed activity may adversely affect some participants and jeopardize their housing through an increased chance of eviction. Specifically, Legal Aid's reservations are:

1. *Elimination of the child care deduction will result in higher rent portions for some families, which when coupled with increased child care expenses, will also increase the cost of employment to the household. Consequently, the policy may discourage some tenants from seeking employment that will require them to pay childcare.*

   LMHA Response: LMHA thanks you for your comment. LMHA has proposed a modification to the Study that would exclude households with a current child care deduction from being eligible to participate in the Rent Reform Study (the Study). Households that currently use the child care deduction will remain under the existing rent policy.

   The elimination of standard deductions, however, remains a fundamental component of the Study. Nationally, fewer than 10 percent of non-elderly/non-disabled families use the child care deduction, because they are not working, or they have children who are too old to be eligible for it, or they are not using paid child care, or for other reasons. Also, many families do not consistently need or use paid child care. With triennial recertification policy, tenants are not required to report when they go to work or increase their earnings during the three years until their next recertification. If child care deductions were

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allowed during that three-year period, tenants would need to be required to report any reductions in their child care costs to the Housing Authority (so that the household's share of rent could be increased) because they would not be continuously entitled to the same level of child care deduction. Reductions in child care costs could occur, for example, when children make a transition into school, when the family changes in child care providers resulting in lower costs, if a family is able to obtain an external child care subsidy, or when children age out of eligibility for the deduction.

Under current rules, child care deductions are based on anticipated child care costs for the coming year. Inaccuracies in projecting these costs would be magnified if they were to be projected over a three-year period. Consequently, the Housing Authority would need to institute careful monitoring procedures and impose new reporting requirements on tenants in order and verify that their child care costs did not change during the three-year period, and that actual child care expenditures, rather than anticipated expenditures, were accounted for. True out-of-pocket child care expenditures by families, and changes in those expenditures, can be difficult to track and verify, particularly when the paid child care is provided by family members, and instituting the necessary tracking and verification requirements would be antithetical to the simplification goals that HUD has established for the new rent policy.

As an alternative, by holding TTP constant when non-working families go to work or currently working families increase their earnings, more of those increased earnings will be available to the family to use as it sees fit.

2. *The minimum rent may create a hardship for some clients, in particular clients with the lowest monthly incomes because those clients will, by virtue of the policy, be assigned the minimum rent.*

   LMHA Response: Under the 1998 housing law, HUD currently authorizes public housing agencies (PHAs) to institute a $50 minimum rent (i.e., a minimum Total Tenant Payment or "TTP"). The inflation-adjusted value of that amount today is roughly $75. Some MTW housing agencies have instituted minimum rents as high as $150. However little is known about the impact of minimum rents on households or PHAs. By testing the minimum rent as part of the alternative rent policy, the LMHA and the Study team will be able to assess the effects of the minimum rent on households and PHAs and share this information with policymakers.

   LMHA has lowered the proposed minimum rent to $50. Recognizing that for some families a minimum rent of $50 could cause serious financial hardship, such families may qualify for a hardship waiver of the minimum rent, allowing them to pay less than the minimum. For example, a household with an income less than $125 per month would

be eligible for a waiver of the minimum rent, and a household with no income would likely pay no rent under the new policy.

3. *The system for requesting and receiving a hardship waiver is too cumbersome to prevent a tenant from being evicted from the rental property.*

LMHA Response: Under the alternative rent policy households will not be required to report increases in income. At the same time, in an effort to help households avoid the types of situations that might prompt an eviction notice, households will be encouraged to report decreases in annual income to their Housing Specialist. Families that have experienced a drop in income may be eligible for a decrease in their rent via an interim certification or hardship waiver. Also, LMHA will provide households with a hard copy of a report at the time of their recertification that indicates what amount of current/anticipated income would make them eligible for an interim recertification or be deemed a hardship based on their current Tenant Total Payment calculation. Additional information would be provided to detail other circumstances, like non-payment of utilities, which could result in a hardship (i.e., an eviction notice).

LMHA will continue to work with the Hardship Waiver working group - a group comprised of local housing and service providers, as well as Metro government staff - to develop procedures to operationalize the hardship waiver request process. LMHA has committed to reviewing all completed hardship requests within 10 days and resolving all hardship cases within 30 days, following the date the household makes application and provides documentation for a hardship waiver. By comparison, under the existing program, it may take weeks to schedule a household that has reported a decrease in income for a review and another month to verify the income and process the change.

LMHA and its partners have given special attention to the "expedited" waiver process for households facing an eviction situation. For households who are at risk of eviction due to rent non-payment and/or utilities shut-off and have received either a 7-day or 14-day eviction notice, the family may simply call their Housing Specialist. LMHA will, upon notice and visual confirmation of the eviction notice, immediately suspend the household's TTP/make an adjustment to the Housing Assistance Payment (HAP) by manual check if necessary. In an effort to relieve the household of the burden of producing the eviction notice, the Housing Specialist will, within 1 business day, attempt to obtain a copy of the notice from the property owner/manager.

Individuals in the working group have expressed support for the hardship waiver procedures. They believe the procedures, as designed, may prevent evictions due to financial hardship and keep families in their homes. Therefore, LMHA has asked the Study team to closely monitor the impact and outcomes of the hardship policy on both households and the Housing Authority.

Comment LAS-4: *LMHA should also consider adding language to the HAP contract prohibiting landlords from filing evictions while a hardship waiver is being considered by LMHA.*

> **LMHA Response:** LMHA has taken your comment under advisement. We would appreciate Legal Aid Society's assistance with drafting the suggested language that would prohibit landlords from filing evictions while a hardship waiver request is being considered by LMHA.

We look forward to working with you on this and other initiatives to address the difficult issues you touched upon in your letter. Thank you again for your participation in this process and valuable input.

Sincerely,

Tim Barry
Executive Director

TB:SL

August 20, 2014

Ms. Kathryn Holmes
915 Schiller Avenue
Louisville, KY 40204

Dear Ms. Holmes:

Thank you for email regarding the proposed Housing Choice Voucher (HCV) Rent Reform Study included in Louisville Metro Housing Authority (LMHA) DRAFT 2014-2015 Moving To Work (MTW) Annual Plan. We appreciate your interest and your strong commitment to affordable housing within this community. Your comments and this letter of response will be included within the MTW Annual Plan submission to the U.S. Department of Housing and Urban Development (HUD).

1. *In your email you state that you have several issues with the study, including the fact that participants in it will not have the right to opt-out.*

   LMHA Response: Under their agreements with HUD, MTW housing authorities, like LMHA, are expected to design and test innovative approaches, including new rent policies, to administering and providing housing assistance. These new policies may establish payment standards, rents or subsidy levels for voucher assistance that differ from the currently mandated program requirements in the 1937 Housing Act and its implementing regulations. MTW agencies are also authorized to adopt policies to calculate the tenant portion of the rent that differ from the current program rules; to determine contract rents and increases and to determine the content of contract rental agreements; to develop a local process to determine rent reasonableness; and to implement time limits for HCV units (vouchers) designated as part of the MTW demonstration.

   Other MTW housing agencies have instituted changes in their rent policies system-wide before testing them, and some MTW agencies have implemented changes to their rent policies that affect only a portion of the households served. This is because households covered by MTW typically do not select their rent policies. Both types of change are permitted under MTW regulations.

   However, to address the issues touched upon in your email, as well as other concerns stated during the Public Comment period, LMHA has proposed several modifications to the HCV Rent Reform Study including a policy with household choice via an "opt-out"

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provision. All households randomly selected to be covered by the alternative rent policy will be given the choice to opt-out and stay with the current rent policy. Households selected for the alternative rent policy group will have the opportunity to meet with an LMHA Housing Specialist to discuss their specific situation and have 30 days to notify LMHA of their decision to opt-out.

LMHA is committed to working with local advocates and legal aid to develop a process that ensures that families are fully informed of the potential benefits and risks of the alternative policy and achieve an understanding of the facts so families can determine whether or not to participate. Opting-out gives the households choice – no household that wishes to avoid the alternative rent policy would be subject to it, if the household elects to opt-out within 30 days.

Households selected for the Study that object to their data being shared with external researchers in non-aggregate form will be allowed to opt out of that part of the Study as originally proposed.

2. *Also, you state that you find it problematic that a minimum rent payment of $75 will be enacted instead of no minimum.*

   LMHA Response: Under the 1998 housing law, HUD currently authorizes housing agencies to institute a $50 minimum rent (i.e., a minimum Total Tenant Payment or "TTP"). The inflation-adjusted value of that amount today is roughly $75. Some MTW housing authorities have instituted minimum rents as high as $150. However little is known about the impact of minimum rents on households or housing authorities. By testing the minimum rent as part of the alternative rent policy, the LMHA and the Study team will be able to assess the effects of the minimum rent on households and housing authorities and share this information with policymakers.

   LMHA has lowered the proposed minimum rent from $75 (originally $100) to $50. Recognizing that for some families a minimum rent of even $50 could cause serious financial hardship, such families may qualify for a hardship waiver of the minimum rent, allowing them to pay less than the minimum. For example, a household with an income of less than $125 per month would be eligible for a waiver of the minimum rent, and a household with no income would likely pay no rent under the new policy.

3. *In addition, you recommend that childcare deductions should not be taken away, which is a risk of this study.*

   LMHA Response: LMHA thanks you for your comment. LMHA has proposed a modification to the Study that would exclude households with a current child care

deduction from being eligible to participate. Households that currently use the child care deduction will remain under the existing rent policy.

The elimination of standard deductions, however, remains a fundamental component of the Rent Reform Study and the alternative rent policy. Nationally, fewer than 10 percent of non-elderly/non-disabled families use the child care deduction, because they are not working, or they have children who are too old to be eligible for it, or they are not using paid child care, or for other reasons. Also, many families do not consistently need or use paid child care. With the triennial recertification policy, tenants are not required to report when they go to work or increase their earnings during the three years until their next recertification. If child care deductions were allowed during that three-year period, tenants would need to be required to report any reductions in their child care costs to the Housing Authority (so that their share of rent could be increased) because they would not be continuously entitled to the same level of child care deduction. Reductions in child care costs could occur, for example, when children make a transition to full-time school, when the family changes in child care providers resulting in lower costs, if a family is able to obtain an external child care subsidy, or when children age out of eligibility for the deduction.

Under current rules, child care deductions are based on *anticipated* child care costs for the coming year. Inaccuracies in projecting these costs would be magnified if they were to be projected over a three-year period. Consequently, the Housing Authority would need to institute careful monitoring procedures and impose new reporting requirements on tenants in order and verify that their child care costs did not change during the three-year period, and that actual child care expenditures, rather than anticipated expenditures, were accounted for. True out-of-pocket child care expenditures by families, and changes in those expenditures, can be difficult to track and verify, particularly when the paid child care is provided by family members, and instituting the necessary tracking and verification requirements would be antithetical to the simplification goals that HUD has established for the new rent policy.

4. *Finally, you wrote that you strongly urge LMHA not to take part in this study, which will disproportionately affect low income black women in our community.*

LMHA Response: LMHA thanks you for your comment. All work-able families that receive voucher assistance administered by LMHA and are not excluded may be affected by the proposed Rent Reform. One of HUD's main goals in commissioning the Rent Reform Demonstration is to determine whether the new rent rules will help voucher holders increase their earnings by allowing them to keep more of what they earn. Because many elderly and disabled households are not expected or able to work, HUD determined that the Demonstration should be limited to working-age, non-disabled

households. The racial and ethnic composition of tenants will reflect the composition of the each participating housing authority's MTW HCV households.

Thank you again for your participation in this process and valuable input. We look forward to working with you in the future.

Sincerely,

Tim Barry
Executive Director

TB:SL