Louisville Metro Housing Authority

Moving to Work Annual Plan

Fiscal Year 2025

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I. Introduction

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. LMHA was formed in 2003 as the result of a merger of the Housing Authority of Louisville and the Housing Authority of Jefferson County. A nine-member Board of Commissioners, appointed by the Metro Mayor, serves as the policy making body of the Agency. LMHA serves over 14,000 low-income families with children, seniors, people with disabilities, and other individuals through its public housing, rental assistance voucher, and local, non-traditional programs.

A. Moving to Work (MTW) Demonstration Program Overview

LMHA, then the Housing Authority of Louisville, has been a participant in the Moving to Work (MTW) Demonstration Program since 1999. The MTW Program, authorized by Congress and signed into law as part of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, provides public housing agencies (PHAs) with the flexibility to design and test innovative, locally-designed housing and self-sufficiency strategies for low-income families. The program allows waivers of certain existing low-income Public Housing (Section 9) and Housing Choice Voucher (Section 8) regulations and statutory provisions and permits LMHA to combine public housing operating and capital funds, along with Housing Choice Voucher rental assistance funds, into a single agency-wide MTW Block Grant.

The terms and conditions of LMHA's participation in the MTW Program, including the waivers authorized under the MTW statute, are defined in the MTW Agreement between LMHA and the US Department of Housing and Urban Development (HUD). The current MTW Agreement extends through Fiscal Year 2028.

Each year, LMHA creates and adopts an MTW Annual Plan that describes new and ongoing activities that utilize MTW authority. HUD approval is required for the Annual Plan. This document is LMHA's MTW Annual Plan for Fiscal Year 2025, i.e. the period from July 1, 2024 through June 30, 2025. The MTW Annual Plan focuses primarily on the Public Housing, Housing Choice Voucher (HCV), and Capital Fund programs, as these are the LMHA programs that fall under the MTW demonstration. It provides information on newly proposed MTW activities, as well as MTW activities that were previously approved by HUD and are ongoing. The Annual Plan also incorporates information about some of LMHA's non-MTW initiatives, which are activities that do not require the use of MTW programmatic or financial flexibility. The MTW Annual Report, which is prepared at the end of each Fiscal Year, provides an update on the status and outcomes of those activities included in the MTW Annual Plan.

MTW Statutory Objectives
Each of LMHA's MTW activities must support at least one of the following three MTW statutory objectives:

- Reduce costs and achieve greater cost effectiveness in federal expenditures;

- Provide incentives to residents, especially families with children, to obtain employment and become economically self-sufficient; and,

- Increase housing choices for low-income families.

B. Long-Term MTW Goals and Objectives

LMHA believes that MTW designation provides an important set of programmatic and financial tools that can be utilized to support the agency's mission, which is to set a standard of operational excellence in providing quality, affordable housing opportunities for residents to achieve self-sufficiency and an enhanced quality of life, and collaborating with community partners to build strong, viable neighborhoods.

At the inception of LMHA's designation as an MTW agency, LMHA evaluated its own goals and objectives in relation to those of the MTW demonstration. The outcome of this process was the development of six long-term goals for LMHA's participation in the MTW program:

- 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.

These broad goals have served as the framework for all of LMHA's MTW Annual Plans, including the FY 2025 Plan. LMHA has also recognized a growing number of populations with specific needs that often go unmet by the existing housing and support service infrastructure. In addition to its original MTW goals, LMHA has established the goal to develop programs and housing stock targeted to populations with special needs, especially those families not adequately served elsewhere in the community.

C. MTW Activity Overview

An MTW activity is defined as any activity LMHA engages in that requires programmatic or financial flexibility to waive statutory or regulatory requirements, pursuant to the MTW Agreement.

A summary listing of LMHA's MTW activities is found below in Table 1.

Table 1: Moving to Work (MTW) Activity Matrix

Activity No.	MTW Activity
	Proposed Activities
2025-1	Increasing Housing Options for Public Housing Families Transferring from Legacy Developments
	Implemented Activities
2023-1	Special Referral MTW Public Housing Program
2022-1	MTW Utility Allowances
2021-1	Preservation of Low-Income Homeownership Units
2021-2	Emergency Waivers
2021-3	Eviction Prevention – COVID-19 Relief
2020-1	Rent Simplification • Financial Aid Disregard in Calculation of TTP; approved 2015 • Elimination of the Earned Income Disregard; approved 2012 • Earned Income Disregard for Elderly Families; approved 2008 • Asset Policy; approved 2020 • Application of Payment Standards; approved 2020 • Modified Standard Medical Deduction; approved 2021
2020-2	Streamlined Flat Rent
2020-3	Local Forms
2020-4	FSS Program Enhancements
2020-5	Gap Financing
2019-1	Enhancements to Local Project-Based Voucher (PBV) Program
2018-1	Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing.
2018-2	HCV Owner Leasing Incentives (formerly Increasing Housing Options for Relocating Beecher Terrace Families)
2014-2	HCV Program - Rent Increase Limit
2014-1	Public Housing - Sublease Programs • Kentucky Spinal Cord Injury Research Center; approved FY 2013 • YouthBuild Louisville; approved 2011
2011-1	HCV Child-Care Deductions Policy
2009-1	Streamlined Development and Acquisition • Simplification of the Public Housing Development Submittal; approved 2009 • Acquisition of Mixed-Income Sites for Public Housing; approved 2011
2008-1	Occupancy at Elderly Developments • Local Definition of Elderly; approved 2008 • Lease-up Incentives for New Residents at Dosker Manor; approved 2010

Activity No.	MTW Activity
2007-1	Streamlined Recertification Process
2006-1	HCV Homeownership Program • Amount and Distribution of HCV Homeownership Assistance; approved 2006 • Exception Payment Standards; approved 2009 • Flexibility in Third-Party Verification; approved in 2009
Not yet implemented	
2011-2	Public Housing - Locally Defined Guidelines for Development, Maintenance, & Modernization
Closed Out	
2016-45	MTW Special Referral Program – Coalition for the Homeless "Move Up" Initiative
2015-1	HCV Program - HUD/MDRC Rent Reform Demonstration
33-2012	Public Housing - Rents Set at 30% of Adjusted Income
24-2010	Public Housing - Increased Flat Rents for New Scattered Sites
21-2010	Public Housing - Occupancy Criteria Changes for New Scattered Sites - Mandatory Case Management
1-2010	Public Housing - Sublease Agreement with Catholic Charities
16-2009	Public Housing - Streamlined Demolition and Disposition Application Process for MTW Agencies
9-2007	Public Housing - Term Limits and Employment/Educational Work Requirements for New Scattered Sites (Revised 2014, 2016)
5-2007	HCV Program - Spatial Deconstruction of HCV Assisted Units
2-1999	MTW Inspections Protocol

D. FY 2024 Goals and Objectives

LMHA will implement a coordinated, comprehensive program of capital improvements, housing and neighborhood development activities, maintenance and management initiatives, and resident supportive services in FY 2025. LMHA projects that 14,125 households will be served through the Agency's rental assistance, public housing, and Local, Non-Traditional activities in FY 2025. As LMHA's funding for FY 2025 is unknown as of the publication date of the MTW Annual Plan, the activities described herein may be modified based on actual funding levels.

LMHA is proposing one new activity for FY 2025, "Increasing Housing Options for Public Housing Families Transferring from Legacy Developments," which would permit one-bedroom-eligible households relocating from legacy Public Housing developments for purposes of demolition, disposition, and/or significant rehabilitation to receive a two-bedroom Housing Choice Voucher.

The agency will also continue to implement previously approved MTW activities, including:

- ***Public Housing Special Referral Program:*** LMHA provides temporary housing in select Public Housing units to families participating in the Family Scholar House program.

Participating families receive supportive services from the Family Scholar House as they work to obtain their college degree or complete an apprenticeship program.

- ***MTW Utility Allowance Activity:*** LMHA received approval from HUD in FY 2022 to implement changes to its utility allowance policies for the Public Housing Program. Using this approved MTW flexibility, LMHA has eliminated the excess utility charges for Public Housing residents. LMHA anticipates that the agency will continue to reduce administrative burden around utility billing and collection and has also reduced utility costs for Public Housing residents as a result of this flexibility.

- ***Preservation of Low-Income Homeownership Units:*** In FY 2025, LMHA will continue to partner with the Louisville Metro Government's Home Repair program to assist eligible low-income homeowners in meeting Housing Quality Standards (HQS) by connecting them to contractors qualified through the Louisville Metro Government. LMHA will provide forgivable loans of up to $25,000 to assist homeowners in completing repairs needed to bring their homes into compliance with HQS. Once the unit has met HQS, LMHA will provide homeownership assistance payments to assist homeowners in maintaining the affordability of their homes.

- ***Rent Policies:*** LMHA will continue to implement several approved rent simplification policies, including a modified standard medical deduction and a revised asset policy. Together, the rent simplification policies approved under Activity #2020-1 simplify and streamline the process of rent calculation, significantly reducing the administrative burden and shortening cycle times.

- ***Local Forms:*** Under this activity, first approved in FY 2020, LMHA has developed and will continue to utilize local versions of HUD required forms to streamline processing.

- ***Family Self-Sufficiency (FSS) Program Enhancements:*** Using MTW flexibility, LMHA has developed FSS program enhancements designed to improve the participant retention rate and to increase participants' long-term economic capacity by providing incentives to complete education and training programs before entering the workforce.

- ***Gap Financing Program:*** LMHA will continue to explore the use of this approved MTW flexibility to assist in the development and preservation of affordable housing. By providing developers awarded Project Based Vouchers (PBVs) gap financing in the form of loans and capital grants, LMHA will make development deals more feasible.

- ***HCV Owner Leasing Incentives:*** LMHA will continue to offer incentives to owners who agree to lease new units in the HCV program, including vacancy loss and damage loss payments. Taken together, LMHA anticipates these incentives will attract new owners to the HCV program and encourage participating owners to lease additional units to HCV participants.

- ***Preservation of Affordable Housing – Broader Use of Funds to Support Mixed Income Housing:*** This activity allows LMHA to acquire unsubsidized units for development of

affordable and mixed income housing. To date, LMHA has utilized MTW funds to develop 205 tax credit units. In FY 2025, LMHA will explore opportunities to acquire and/or recapitalize tax credit or other unsubsidized properties.

- ***Enhancements to Local Project-Based Voucher (PBV) Program:*** LMHA has adopted project- based policies to help meet the requirements of LMHA's Beecher Terrace Choice Neighborhood Initiative (CNI) Implementation Grant as well as to provide additional housing choices for low-income households in high opportunity areas, incentivize developers to preserve or create affordable housing units, and streamline the administration of PBVs.

- ***MTW Homeownership Program:*** In FY 2025, will continue to assist families to become homeowners.

- ***Elderly/Disabled Housing:*** In FY 2025, LMHA will continue to use MTW flexibility to maximize leasing at elderly/disabled developments. Efforts include changing the definition of elderly from 62 to 55 and above and providing lease-up incentives. It is anticipated that these initiatives will continue to increase occupancy rates at these developments.

- ***Streamlined Recertification Process:*** LMHA will continue offering alternate recertification schedules in FY 2025, including biennial and triennial recertifications for certain Public Housing and HCV families.

- ***Owner Rent Increase Limit:*** As rents continue to escalate rapidly in the Louisville Metro area, LMHA became concerned that artificially capping contract rent increases might force existing residents to move if owners are unwilling to accept the capped rent increase. As a result, the Housing Authority stopped this activity during FY 2024 and will close it out in its FY 2025 MTW Annual Report.

- ***Units for Underserved Populations:*** In its efforts to provide units to underserved populations, LMHA will continue to provide the following housing opportunities through Public Housing sublease programs:

    - Fully accessible units to individuals with disabilities in partnership with the University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC). The program provides transitional housing for up to 12 months per family. With support from the KSCIRC social worker, sub-lessees are connected to community resources and support as well as financial assistance for their transition from the program.

    - Temporary housing for low-income YouthBuild Louisville (YBL) participants who are experiencing homelessness. Up to three, 2-bedroom units will be available for YBL participants who may stay in the unit as long as they are active in the YBL program. LMHA provides a Public Housing preference to these individuals upon graduation from YBL.

- **HCV Special Referral Programs:** Through its MTW Special Referral Program, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. In FY 2025, LMHA will expand its voucher allocations to include new voucher allocations for the following organizations:

    - Churchill's House of Hope: 10 vouchers to assist households that include a homeless pregnant person
    - House of Ruth: 38 vouchers to households at 30% of AMI that include a member with HIV.
    - Inge's House: 10 vouchers for households that include a woman under a cancer treatment plan
    - Louisville Metro Government Office of Safe and Healthy Neighborhoods: 10 vouchers for those who are in unstable and/or unsafe housing conditions due to being victims of gun violence
    - Louisville Metro Police Department: 10 vouchers for the relocation of victims or witnesses of criminal activity
    - My Chosen People: 70 vouchers for homeless households
    - Pushing Forward, Inc.: 10 vouchers to households that include a member who has suffered a spinal cord injury
    - Volunteers of America Mid-States: 80 vouchers to families that include a member who is a veteran and 100 vouchers to graduates of Unity House and Freedom House
    - ZeroV: 35 vouchers for households that include a survivor(s) of domestic violence, dating violence, stalking, and/or sexual assault and that are exiting ZeroV's Rapid Re-Housing Program

Along with its MTW implementation activities, LMHA will implement other initiatives in FY 2025 that do not specifically require MTW authority or Block Grant flexibility to administer. Highlights of LMHA's planned non-MTW activities include:

- ***Development and Redevelopment Activities***

    - *Vision Russell Choice Neighborhood Initiative:* LMHA, Louisville Metro Government, and community partners will continue redevelopment efforts in the Russell neighborhood in FY 2025. Construction of Beecher Terrace Phase IV, comprising 210 units, began in August 2023 is anticipated to be complete in late 2025. The stabilization of Quinn Chapel and the commercial rehab portion of the 18th Street Corridor Critical Community Improvements (CCI) projects are anticipated to be completed during the 1st quarter of FY 2025.

    - *Sheppard Square HOPE VI Revitalization:* LMHA continues to work with its partners to develop the lots reserved for homeownership units along Hancock Street in Sheppard Square. Habitat for Humanity is under contract to develop 16 of these lots. As of March1, 2024, Habitat has closed and completed construction of eight single family homes. One home is currently under construction, and three to five additional closings are anticipated to take place by the end of FY 2025.

River City Housing, Inc. (RCH) has closed and completed one home. RCH also recently partnered with REBOUND, Inc, and Bates Community Development Corporation to establish the Smoketown Community Land Trust (SCLT) and is in the process of entering into a Development Agreement with LMHA that provides River City Housing the opportunity to develop the remaining seven homeownership lots at Sheppard Square.

- *New Walnut Street Park at 13th and Muhammad Ali Blvd.:* Construction plans for the new park, which will be located on a portion of the former paint factory, are nearing completion. This first phase of construction on the site will include a splashpad, restrooms, playground equipment, a walking path, two pickle ball and one tennis court, a synthetic turf multi-sport playing field, and other recreational features. Louisville Metro Parks and Recreation, who will oversee the construction and operation of the park, anticipates beginning construction in early FY 2025 and opening the park approximately nine months later. LISC Louisville and the NFL Grassroots Foundation awarded $250,000 towards the construction of the multi-sport playing field in March 2023. Louisville Metro Government also awarded American Rescue Plan (ARP) funds in FY 2023 to help create this park, which lies directly adjacent to the redeveloped Beecher Terrace community. Plans for Phase II anticipate mixed-used building(s) along Muhammad Ali Boulevard for commercial and retail businesses.

- *Baxter Community Center*: LMHA will continue with the renovation and expansion of the historic Baxter Community Center located at Beecher Terrace. This beloved landmark has served as Beecher's supportive service, recreational, and social epicenter since its inception in 1940, and future programming plans include educational programs and other out-of-school time offerings for neighborhood youth. Among the amenities planned are classrooms, a gymnasium, teaching kitchen, lounge area, and audio-video rooms. Grants from the James Graham Brown Foundation ($1,000,000), American Rescue Plan, Choice Neighborhoods Implementation program, and LMHA MTW funds will be used towards the renovation and expansion costs. Construction began in January 2023 and is anticipated to be complete in October 2024.

- *Rental Assistance Demonstration Participation*: LMHA anticipates developing 21 new construction RAD units on the Beecher former Public Housing site as part of Phase IV of rental redevelopment, which is planned to include 210 units in total. Construction of these units is anticipated to begin in FY 2025.

  LMHA considers RAD to be one of the key tools available as it looks to preserve its Mixed-Finance and Public Housing affordable housing portfolio. During FY 2023, an LMHA contractor performed Physical Conditions Assessments for much of LMHA's Public Housing portfolio. During FY 2025, sites will be evaluated and prioritized, and select sites may be submitted for RAD conversion with a Plan amendment submitted prior to proceeding. LMHA will also continue to analyze opportunities to use the RAD program to reposition its scattered site portfolio.

- *Iroquois Senior Living Community:* LMHA plans to begin construction on Phase I of the Iroquois Homes redevelopment during Summer 2024. The Iroquois Senior Living Community (1400 Bicknell Ave.) will be a 60-unit apartment building for elderly families (age 55+). Financing, in part, will be provided through a $11,750,000 forgivable loan from the Louisville Affordable Housing Trust Fund. Further phases may include mixed-income housing, potentially with mixed-use elements. During FY 2025, LMHA may pursue appropriate funding opportunities as they become available. A Planned Development District is being considered for the nearby Taylor Boulevard corridor.

- *Dosker Manor:* LMHA will be working with the residents of Dosker Manor and the greater Louisville community to identify a comprehensive strategy to reposition the Dosker Manor development considering all available options including but not limited to the Rental Assistance Demonstration ("RAD") program, Section 18, and Faircloth-to-RAD.

- ***Grants and Funding Opportunities*** – In FY 2025, LMHA will continue to administer existing grants, which include the FSS Coordinator ROSS grants and the Choice Neighborhoods Implementation and Supplemental grants. LMHA was awarded $1 million in grant funding from the James Graham Brown Foundation, $6 million in American Rescue Plan funds from Louisville Metro Government, and $250,000 from LISC Louisville and the NFL Grassroots Foundation, which will be used for recreational amenities at Beecher Terrace. LMHA will review and potentially pursue any current or new grant opportunities that should become available during FY 2025. These include, but are not limited to, those which may allow the Authority to conduct master planning or redevelopment at its older housing stock, perform substantial upgrades or energy improvements to its properties, and/or provide additional supportive services to participants in its housing programs. Funds may be sought from federal, state and city sources, such as Community Development Block Grants or State Historic Tax Credits, as well as private foundations.

- ***Prudent Fiscal Management and Internal Controls –*** LMHA will continue to implement a comprehensive program of internal audit, compliance reviews and fiscal management.

II. General Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

LMHA plans to add two new public housing units to its inventory in FY 2025.

Table 2: Planned New Public Housing Units in FY 2025

AMP Name and Number	Bedroom Size						Total Units	Population Type	Section 504 Accessible Units	
									Mobility	Hearing/ Vision
	0/1	2	3	4	5	6+				
HOPE VI Scattered Sites (KY001000034)			1				1	Family	X	X
Sheppard Square HOPE VI Replacements (KY001000061)	1						1	Family		
Total Public Housing Units to be Added in the Plan Year							**2**			

ii. Planned Public Housing Units to be Removed

See Appendix E for a list of affected unit addresses.

Table 3: Planned Public Housing Units to Be Removed in FY 2025

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Bayberry KY001000034	10	LMHA plans to remove 10 public housing units, which are part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of these units in FY 2025.
HOPE VI Scattered Sites KY001000034	14	LMHA plans to remove 14 public housing units, which are part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of these units in FY 2025.

AMP Name and Number	Number of Units to be Removed	Explanation for Removal
Berrytown KY001000034	17	LMHA plans to remove 17 public housing units, which are in need of significant rehabilitation that would not be cost effective.
Sheppard Square HOPE VI Replacements KY001000061	1	LMHA plans to remove 1 public housing unit, which is part of a condo regime. LMHA's experience has shown that such units often do not function well, as the regime is often ill-equipped and underfunded. LMHA will request HUD approval to dispose of this unit in FY 2025.
Total Public Housing Units to be Removed in the Plan Year	**42**	

iii. Planned New Project Based Vouchers (PBV)

Table 4: New Housing Choice Vouchers to be Project-Based in FY 2025

Property Name	# of Vouchers to be Project-Based	RAD?	Description of Project
N/A	0	0	N/A
Planned New Project Based Units in Plan Year	**0**		

LMHA may issue a new Request for Proposals for Project-Based Voucher units in FY 2024. The Housing Authority does not yet have an estimate for the number of Project-Based Voucher units that may be added through this process.

iv. Existing Project Based Vouchers

Table 5: Existing Project Based Vouchers

Property Name	# of Project Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
Beecher I	114	Leased	No	New Construction – Senior Housing
Beecher II	43	Leased	No	New Construction – Family Housing
Beecher III	61	Leased	No	New Construction – Family Housing
Donerail	164	Leased	No	New Construction – Family Housing
Market St. Apartments	8	Leased	No	Existing – Family Housing

Property Name	# of Project Based Vouchers	Planned Status at End of Plan Year	RAD?	Description of Project
The Eclipse in Russell	119	Issued	No	New Construction – Family Housing
Gateway on Broadway Senior Apartments	116	Issued	No	New Construction – Senior Housing
New Vision III	8	Leased	No	Substantial Rehab – Family Housing
Newbridge Place	27	Leased	No	Existing – Family Housing
Opportunity East	9	Leased	No	Existing – Family Housing
Roosevelt Apartments	43	Leased	No	Existing – Family and Senior Housing
Zion Manor Senior Housing II	34	Leased	No	New Construction – Senior Housing
Lower Hunter's Trace	84	Leased	No	New Construction – Family Housing
Crossings at Mill Creek	90	Leased	No	New Construction – Family Housing
Total Planned Existing Project-Based Vouchers	**920**			

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

Table 6 provides a summary of other activities currently planned by LMHA during FY 2025, including disposition, rehabilitation, and modernization activities. Additional activities may be added during the Plan year, subject to Board approval and any applicable HUD approvals. See Appendix E for a list of affected unit addresses.

Table 6: Planned Other Changes to the MTW Housing Stock

Property Name	Description
Beecher Terrace Tract 1 - 300 S. Roy Wilkins Ave. (AMP 002)	LMHA plans to dispose of 1.56 acres of vacant land located at the northeast corner of 9th St. and W. Jefferson St.
Beecher Terrace Tract 4 – Southeast corner of 9th St. and W. Muhammad Ali Blvd. (AMP 002)	LMHA plans to dispose of 1.88 acres of vacant land.
Beecher Terrace Tract 13 – Northwest corner of W. Jefferson St. and 13th St. (AMP 002)	LMHA plans to dispose of 1.89 acres of vacant land.

Property Name	Description
Beecher Terrace Tract 14 – Northwest corner of W. Jefferson St. and 13th St. (AMP 002)	LMHA plans to dispose of 1.89 acres of vacant land.
1705 S 13th St. (AMP 003)	LMHA has received HUD approval to dispose of the Keystone Learning Academy, a non-dwelling building. This property is not and never has been public housing. LMHA anticipates closing on this transaction during FY 2025.
Dosker Manor (AMP 012)	LMHA plans to demolish and dispose of 692 elderly/disabled Public Housing units. The Authority is currently seeking development partners to redevelop the site to include low-income housing.
Avenue Plaza (AMP 014)	Approximately 32 units at a time will be held offline for domestic water supply and sanitation drain line replacement and bathroom upgrades.
Scattered Sites (AMP 017)	14 vacant units will be held offline for renovation in FY 2024.
601 West Breckinridge (AMP 034)	Former Louisville Housing Services Office will be converted into a public housing unit. LMHA anticipates awarding a contract to complete the conversion in FY 2024.
4020 Garland Ave. (Address in PIC) / 4011 W. Kentucky (Vacant lot address) (AMP 043)	LMHA plans to dispose of 0.91 acres of vacant land.
Clarksdale I Scattered 69 (AMP 047)	2 vacant units will be held offline for renovation in FY 2024.
H. Temple Spears (AMP 061)	24 vacant units will be held offline for renovation. LMHA will award a contract and begin work on this renovation project in FY 2024.
Holly Park (AMP 061)	44 units will be held offline for renovation. LMHA will award a contract and begin work on this renovation project in FY 202**4**. Former management office will be converted to 1-bedroom public housing unit.
1327 W. Muhammad Ali Blvd./400 S. 13th St. (No AMP)	LMHA plans to dispose of 1.7 acres of vacant land that previously formed the southern portion of the former Porter Paint site.
1638 W. Kentucky St., Apt. 15 (TBD)	LMHA plans to dispose of this condominium unit.
768 Barret Ave. (AMP 034)	LMHA has received HUD approval to dispose of this non-dwelling office space and anticipates closing on the transaction in FY 2025. This property is not and never has been Public Housing.
431 E. Liberty St. (AMP TBD)	LMHA plans to demolish a non-dwelling building and dispose of this parcel. The property is not and never has been Public Housing.

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

LMHA's capital planning and development strategies are designed to support, rehabilitate, and modernize existing LMHA sites. Utilization of MTW Block Grant funding and programmatic flexibility remains a critical element in LMHA's modernization and development efforts. LMHA maintains updated physical needs assessments, including estimated replacement and/or repair costs for all LMHA developments.

Table 7 provides information on LMHA's planned capital and development expenditures for FY 2025 including projects funded from MTW Block Grant and other sources. The information on Table 7 is preliminary and subject to change based on actual funding and other factors. Actual obligations and expenditures may vary based on factors such as construction schedules, timing of HUD and local approvals, availability of leveraged funding and new and emerging repair needs. Note also that capital projects often are implemented over multiple years.

Table 7: Planned Capital Expenditures During the Plan Year

Project Type	Site Name	Project Description	Total Estimated Budget
Capital Improvements	Parkway Place - 003	HALO	$191,750
		Dwelling Equipment	
		Resident Stipends	
		Tree Trimming	
		Eviction Prevention Program	
		Security	
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Dosker Manor - 012	Dwelling Equipment	$4,284,750
		HALO	
		Resident Stipends	
		Tree Trimming	
		Eviction Prevention Program	
		Contingency Projects	
		High Rise Security	
		Transfers due to required work on unit	
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	St Catherine Court - 013	Resident Stipends	$266,400
		Dwelling Equipment - Ranges and Refrigerators	
		HALO	
		Eviction Prevention Program	
		High Rise Security	
		Tree Trimming	
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Avenue Plaza/550 Apt - 014	Tree Trimming	$2,283,000
		Transfers due to required work on unit	
		Eviction Prevention Program	
		Resident Stipends	
		Contingency Projects	

		Dwelling Equipment	
		Hi-Rise Security	
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Scattered Sites - 017	Eviction Prevention Program Transfers due to required work on unit Resident Stipends Siding - East Pages Tree Trimming Windows 621 E. St Catherine, 2127 Bank 960-64 S. 6th, 2404 17 group 1 Window Replacement 906-908 S 6th #17 #1 Dwelling Equipment	$190,000
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Scattered Sites - 034	Dwelling Equipment Eviction Prevention Program Resident Stipends Transfers due to required work on unit Tree Trimming	$54,407
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Lourdes Hall	High Rise Security Tree Trimming Dwelling Equipment Eviction Prevention Program Resident Stipends	$152,000
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Will E Seay Plaza	Resident Stipends Security Eviction Prevention Transfers due to required work on unit Tree Trimming Dwelling Equipment	$228,000
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Improvements	Scattered Sites - Amp #61	Dwelling Equipment Eviction Prevention Program Resident Stipends Tree Trimming Security Windows New - Holly Park	$78,000
Project Type	**Site Name**	**Project Description**	**Total Estimated Budget**
Capital Services	Sheppard B	Additional Operating Subsidy	$37,122
Capital Services	Sheppard ACD	Additional Operating Subsidy	$142,404
Capital Services	Sheppard EF	Additional Operating Subsidy	$60,578
Capital Services	Sheppard PCC	Additional Operating Subsidy	$195,230

Capital Services	Mixed Finance Capital Contributions	Friary Partners - 064	$40,000
Capital Services	Contracts	Annual A/E Contract	$1,154,000
		Annual Asbestos and Lead Removal Contract	
		Environmental Consultant - Remediation Monitoring	
		Annual Microsoft Software	
		Cyber Security	
		Total Annual Contracts	
Capital Services	Administrative Costs	Construction Administration 10% transfer	$1,642,359
		Contingency	
		General Fund for Operations	
		Total	**$ 11,000,000**

B. Leasing Information

i. Planned Number of Households Served

Table 8: Planned Number of Households Served

Planned Number of Households Served Through:	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
MTW Public Housing Units Leased	41,899	3,492
MTW Housing Choice Voucher (HCV) Units Utilized	126,888	10,574
Local, Non-Traditional: Property-Based	948	79
Local, Non-Traditional: Homeownership	300	25
Planned Total Households Served	**170,035**	**14,170**

In addition to planned MTW leasing, LMHA aims to achieve 80% utilization in its Family Unification Program (FUP) and 85% in its Veterans Affairs Supportive Housing (VASH) Program.

Table 8A: Local, Non-Traditional Programs

Local, Non-Traditional Category	MTW Activity Name/Number	Planned Number of Unit Months Occupied/Leased	Planned Number of Households to be Served
Property-Based	Activity #2014-1: Public Housing – Sublease Agreement	48	4
Property-Based	Activity #2018-1: Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing	900	75
Homeownership	Activity #2021-1: Preservation of Low-Income Homeownership Units	300	25

Table 9: Anticipated Issues and Possible Solutions Related to Leasing

Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
MTW Public Housing	To eliminate delays in re-leasing units, LMHA will continue to deploy specialized crews to address work required to prepare a unit for new tenants. Vacancy preparation crews specialize in the work commonly required to turnover a unit and have the capacity to turn units on pace with the volume of tenant move-outs in a given month. These crews serve all Public Housing properties managed by LMHA and are not limited to a particular property. The Housing Authority will also continue to offer lease-up incentives to applicants accepting a unit at Dosker Manor.
MTW Housing Choice Voucher	LMHA will continue to provide owner incentives under Activity 2018-2 for leasing new units to HCV participants. Incentives also include payments to mitigate vacancy and damage loss. LMHA also provides a preference to homeless families on the waiting list for the HCV program, which allows LMHA to streamline the admissions process for these families.

C. Waiting List Information

LMHA administers its waiting lists in accordance with the Housing Choice Voucher (HCV) Program Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP), as applicable. Administration of the Public Housing central waiting list is managed by the Occupancy Department to ensure consistent and efficient management of applicants. Administration of Site Based Waiting Lists is overseen by each respective management company.

LMHA operates its waiting lists in a nondiscriminatory manner that seeks to avoid unintended discriminatory effects. LMHA affirmatively markets its sites to ensure that the public is aware of the availability of LMHA housing. LMHA treats all applicants in a non-discriminatory manner. Table 10 provides information on LMHA's waiting lists in the format required by HUD.

i. Waiting List Information Anticipated

Table 10: Waiting List Information Projected for Beginning of FY 2025

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open or Closed	Plans to Open the Waiting List During the Plan Year
Federal MTW Housing Choice Voucher Program	Community Wide	5,649	Open	N/A
Federal MTW Project-Based Voucher Program	PBV Waiting List	174	Partially open*	N/A
Beecher Terrace Project-Based Voucher	Site-based	223	Open	N/A
Zion Manor Senior Housing Project-Based Voucher	Site-based	11	Open	N/A
Donerail Project-Based Voucher	Site-based	234	Open	N/A
Crossings at Mill Creek / Lower Hunters Trace Project-Based Voucher	Site-based	300	Open	N/A
Roosevelt Apartments Project-Based Voucher	Site-based	18	Open	N/A
New Vision III Project-Based Voucher	Site-based	3	Open	N/A
Market St. Apartments Project-Based Voucher	Site-based	18	Open	N/A
Federal MTW Public Housing Units	Site-Based	680	Partially open at Park DuValle (1-bedroom waitlist closed)	No planned changes to waitlist status.
Federal MTW Public Housing Units	Community-Wide	3,785	Open	N/A
Project Based Local Non-Traditional MTW Housing Assistance	Program Specific	0	Open	N/A

** LMHA maintains a central waiting list of former Beecher Terrace households, who receive a preference for on- and off-site replacement PBV units developed as a result of the CNI Implementation grant.*

Description of any duplication of applicants across waiting lists:

As LMHA maintains separate HCV, Public Housing, and PBV wait lists, applicants may apply and be on multiple waiting lists.

ii. Planned Changes to Waiting List in FY 2025

Waiting List Name	Description of Planned Changes to Waiting List
Federal MTW Project-Based Voucher Program	LMHA has approved several owner-managed site-based waiting lists for PBV sites developed as replacement housing as a result of the Beecher Terrace Choice Neighborhood Initiative. The following developments may open site-based waitlists in FY 2025: The Prestonian, the Eclipse in Russell, Newbridge, and Gateway on Broadway. LMHA may also form a waitlist of former Iroquois Homes public housing residents who are interested in residing in the Iroquois Senior Living Community, once constructed. The only occupancy criteria for former Iroquois residents to return to the development will be that they must be lease compliant and be part of an elderly household (age 55+).
Federal MTW Housing Choice Voucher Program	On July 1, 2023, LMHA closed the tenant-based waitlist to Applicant Families, with the exception of all Applicant Families receiving a preference, Applicant Families referred by Special Referral Programs, Applicant Families seeking a Special Purpose Voucher, and Applicant Families applying to the SRO Program. LMHA will continue monitoring the number of households on its tenant-based waitlist and may re-open the waitlist during FY 2025. LMHA will institute a preference for households in good standing whose Family Unification Program (FUP) voucher is expiring. For work-able households, the preference is contingent on Family Self-Sufficiency (FSS) Program graduation.
Federal MTW Public Housing Units	LMHA may close the one-bedroom Public Housing waitlist in FY 2025. LMHA will change its Public Housing homeless preference to a 25% set aside, while working with its supportive services partners to provide additional special referral vouchers to assist homeless households.

III. Proposed MTW Activities

LMHA is proposing one new MTW activity for FY 2025.

Activity #2025-1: Increasing Housing Options for Public Housing Families Transferring from Legacy Developments

Description
Since the 1990s, LMHA has successfully re-imagined four of its legacy housing developments, redeveloping Park DuValle, Clarksdale (Liberty Green), Sheppard Square, and Beecher Terrace as sustainable, mixed-income communities. Three additional legacy sites in need of significant rehabilitation, demolition, and/or disposition remain in the Housing Authority's portfolio: Dosker Manor, Avenue Plaza, and Parkway Place.

LMHA is currently kicking off a resident engagement and planning process for Dosker Manor, and will be working with residents, Louisville Metro Government, supportive service providers, potential financing partners, and other stakeholders to re-imagine the development.

As planning for these legacy sites moves forward, it is likely that residents will be transferred (either temporarily or permanently) to a Public Housing unit, a Housing Choice Voucher (HCV) unit, or to a Project-Based Voucher (PBV) property as rehab, redevelopment, and/or disposition occur.

Once the transfer process begins, LMHA is committed to offering these households as wide a range of housing options as possible and to easing the transition of those who choose to transfer to a private market unit using an HCV or PBV voucher. Over the past several years, LMHA has had concerns regarding the availability of one-bedroom units in the Louisville market. Therefore, as part of its Beecher Terrace revitalization initiative, the agency used MTW flexibility to offer a 2-bedroom payment standard to 1-bedroom eligible households that transferring out of the development. The agency would now like to re-propose this activity for households that need to transfer from Dosker Manor, Avenue Plaza, or Parkway.

LMHA will offer a two-bedroom payment standard to all one-bedroom-eligible households moving from one of its three legacy Public Housing developments using an HCV or PBV voucher as part of a demolition, disposition, and/or significant rehab project. If a family chooses to lease a one-bedroom unit, they will receive the one-bedroom payment standard. Although LMHA does not anticipate any transferring households will select a zero-bedroom unit, should they do so, they will receive the zero-bedroom payment standard.

Households that subsequently move to a second HCV or PBV unit will be right-sized back to a one-bedroom payment standard.

In addition, LMHA will offer two-bedroom Public Housing units to one-bedroom-eligible households.

Units that may be affected by this activity include:

Count of 0-BR and 1-BR Legacy Public Housing Units

Development	0-BR Units	1-BR Units	Total
Dosker Manor	4	642	646
Avenue Plaza	135	89	224
Parkway Place	0	208	208
		Total	**1,078**

This activity will increase housing options for low-income households and will be implemented upon the commencement of transfers from legacy Public Housing developments.

Metrics

This activity is expected to increase housing options for low-income households but not to increase cost effectiveness or family self-sufficiency.

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark oAchieved?**
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase) affecting households transferring from legacy Public Housing sites.	0	200		

Data Source: Yardi

HC #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 because of the activity (increase).	0	200		

Data Source: Yardi

Cost Implications

The anticipated total annual cost of this activity in the Housing Choice Voucher Program is as follows:

Total Annual Cost of Increased Payment Standard Post-Transfer

2-BR Payment Standard	$1,301
Minus	
1-BR Payment Standard	$1,077
Equals	
Incremental Monthly Cost of Increase from 1-BR to 2-BR Payment Standard	$224
Multiplied by 12 Equals	

Incremental Annual Cost of Increase from 1-BR to 2-BR Payment Standard	$2,688
Multiplied by	
Number of 1-BR Eligible Households Leasing a 2-BR Unit	200
Equals	
Annual Cost of Activity	**$537,600**

Funding will be provided through HUD-held Section 8 reserves.

Need / Justification
In order to modify the payment standard offered to transferring residents, this activity requires the following authorization:

- **Attachment C, Section D.2.a,** which authorizes the Housing Authority "to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. 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 requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 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, as necessary to implement the Agency's Annual MTW Plan."

The ability to increase housing choices by offering two-bedroom Public Housing units to one-bedroom-eligible households requires the following authorization:

- **Attachment C, Section B.b**, which states that "The Agency may use MTW Funds for any eligible activity under Sections 9(d)(l), 9(e)(1) and Section 8(o) of the 1937 Act. Within the scope of the permissible eligible activities, the Agency can carry out the purposes of the MTW Demonstration Program to provide flexibility in the design and administration of housing assistance to eligible families, to reduce cost and achieve greater cost effectiveness in Federal expenditures, to give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families, through activities that would otherwise be eligible under sections 8 and 9 of the 1937 Act…"

Rent Reform
This activity does not include rent reform.

IV. Approved MTW Activities

This section of the MTW Annual Plan summarizes and provides a status update on MTW activities that have been previously approved by HUD and implemented by LMHA. As required, this section also includes summary information on MTW activities that have not yet been implemented, closed out, or placed on hold by LMHA. Please note that some of the previously approved MTW activities have been renumbered and combined where the authorizations were the same and where the activity features follow similar topics. The revised numbering convention reflects the earliest fiscal year that the activity was first included in the MTW Annual Plan, followed by a consecutive number for the activity for that year, i.e. 2008-1, 2008-2, 2008-3. Where activities were combined, the number reflects the earliest fiscal year one of the activities was approved; however, under "Plan Year Approved, Implemented and Amended," each activity feature includes its own approval, implementation, and amendment date.

A. Implemented MTW Activities

Activity #2005-1: Special Referral MTW Housing Choice Voucher Programs

(Formerly Activity #44-2015 and all of the activities in Table 11.)

Plan Year Approved, Implemented, Amended

Table 11 identifies the Plan Year each Special Referral sub-activity was approved, implemented, and amended.

Description/Update

Through its MTW Special Referral Programs, LMHA partners with local, non-profit social services organizations to provide housing support to vulnerable populations whose needs are not adequately met elsewhere in the community. LMHA provides housing subsidy to HCV-eligible households, provided vouchers are available at the time of request, while the partnering agency provides social services support. The provision of services helps families make strides towards self-sufficiency, and the programs increase housing choices for low-income families who might otherwise have difficulty succeeding in the privately-managed real estate market.

Families are referred to LMHA by the partner agencies, and program applicants receive an admissions preference for the Authority's HCV Program. The provision of this admissions preference is contingent on the availability of vouchers. Households are required to meet basic HCV eligibility criteria, and the amount of housing assistance each family receives is determined according to traditional HCV Program rules as modified through LMHA's HUD-approved MTW initiatives.

The voucher recipients participating in some of the agency's MTW Special Referral Programs are initially required to reside on-site and to meet the partner's program requirements. However, 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. For other Special Referral Programs, the voucher is fully portable from the time of admission.

Many of the residential facilities operated by these Special Referral partners 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 HUD Housing Quality Standards (HQS) inspection. This inspection alternative has saved the authority thousands of dollars since Louisville Scholar House first came online in 2008.

Additionally, LMHA may, without prior HUD approval, allocate up to 10 MTW Housing Choice Vouchers to an MTW Special Referral 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.

Table 11, "LMHA Special Referral MTW Voucher Programs FY 2025," identifies all special referral voucher programs LMHA administers as well as information regarding:

- The year the voucher allocation was proposed;
- The year the voucher allocation was implemented, and the number of vouchers allocated;
- A description of the program;
- Whether the vouchers are portable;
- If there is a streamlined admission; and
- What type of inspection applies.

LMHA will monitor utilization and may re-allocate the vouchers if utilization is below the allocated number of vouchers.

Planned Non-Significant Changes

In FY 2025, LMHA will expand its voucher allocations to include the following additional vouchers:

- Churchill's House of Hope: 10 vouchers to assist households that include a homeless pregnant person
- House of Ruth: 38 vouchers to households at 30% of AMI that include a member with HIV
- Inge's House: 10 vouchers for households that include a woman under a cancer treatment plan.
- Louisville Metro Government Office of Safe and Healthy Neighborhoods: 10 vouchers for those who are in unstable and/or unsafe housing conditions due to being victims of gun violence.
- Louisville Metro Police Department: 10 vouchers for the relocation of victims or witnesses of criminal activity
- My Chosen People: 70 vouchers for homeless households

- Pushing Forward, Inc.: 10 vouchers to households that include a member who has suffered a spinal cord injury
- Volunteers of America Mid-States: 80 vouchers to families that include a member who is a veteran and 100 vouchers to graduates of Unity House and Freedom House
- ZeroV: 35 vouchers for households that include a survivor(s) of domestic violence, dating violence, stalking, and/or sexual assault and that are exiting ZeroV's Rapid Re-Housing Program

As LMHA moves forward with transitioning from a full admissions preference for homeless households in the Public Housing Program to a 25% set aside, the Housing Authority plans to increase engagement with special referral partners providing services for these families, as the agency wishes to expand the number of service-enriched vouchers serving this population.

Planned Changes to Metrics/Data Collection
There are no planned changes to metrics or data collection.

Metrics

CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase)	$0	$0		
SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
# of HHs receiving services aimed to increase self-sufficiency (increase).*	392 (100% of 392 HHs)	479		
** All families participating in the Special Referral program receive supportive services intended to assist the family in becoming self-sufficient.*				
SS #8: Households Transitioned to Self-Sufficiency*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency (increase).	43 (11% of 392 HHs)	50		
**Self-Sufficiency is defined as the ability of a non-disabled / non-elderly family to obtain suitable employment. "Employment" means the household is receiving earned income. "Suitable" is defined as annual gross earned income equal to or exceeding $14,500 (the hourly minimum wage as of $7.25 multiplied by 2,000 hours).*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	<1 month	<1 month		

Planned Significant Changes
No significant changes are planned.

Table 11: LMHA Special Referral MTW Voucher Programs FY 2024

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
100K Homes Initiative	N/A	2012	2012	50	Vouchers are allocated to 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 up to 50 of the 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.	Full portability upon program completion	No	No: Traditional inspection protocol.
Center for Women and Families	Villager; Scattered	2005	2005 2021	22 10	Vouchers are allocated to the Center for Women and Families for 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 high. This activity has increased housing choices and the cost effectiveness of federal funds. The Center for Women and Families will also provide referrals for up to 10 HCVs for scattered site units to residents of public housing who are victims covered by VAWA when a public housing unit is not readily available for transfer.	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.
Seven Counties Services	Scattered Site Locations	2015	2015 2021	50 10	Vouchers are allocated to Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices and access to services for 50 families referred through Centerstone'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) and designed to	Full portability upon program completion	No	No: Traditional inspection protocol.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					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). 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. 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 fills this gap and assists the program participants in achieving and maintaining community integration. 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.			
Choices, Inc.	Choices owned units	2014	2014 2016 2019	4 1 1	Vouchers are allocated to Choices, Inc. to provide permanent supportive housing for homeless families, including case management.	Full portability upon program completion	No	No: Traditional inspection protocol.
ChooseWell Communities	Scattered Site Locations	2016	2016 2017 2021	10 60 10	Vouchers are allocated to ChooseWell Communities' Thrive Program, which assists families that include a pregnant or post-partum mother who has successfully completed residential and/or intensive outpatient treatment for addiction, combining housing support with wraparound social services assistance. In FY 2016, LMHA allocated up to 10 vouchers to this program; this was increased by 60 vouchers in FY 2017. Eighty (80) vouchers are allocated to referrals from ChooseWell Communities.	Full portability upon program completion	No	No: Traditional inspection protocol.
Coalition for the Homeless	Scattered Site Locations	2012	2012 2013	10 10	Vouchers are allocated to Coalition for the Homeless for homeless families with children.	Full portability upon program completion	No	No: Traditional inspection protocol.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	(Rapid Re-housing)							
Day Spring	Day Spring units	2009	2012	4	Vouchers are allocated to households with members who have a severe mental illness, if they initially reside at a Day Spring constructed unit, while they are participating in the program Day Spring, a faith-based charitable organization, which provides residential and supportive services to adults with developmental disabilities who want the opportunity to live independently in a supportive community setting. Under this initiative, not all the residential units are subject to typical HUD HQS and rent reasonableness requirements.	Full portability upon program completion	Yes	No: Traditional inspection protocol.
Family Scholar House	Louisville	2008	2008	56	LMHA allocates vouchers to a Special Referral Program with Family Scholar House for their Louisville Scholar House facility. These 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.	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used. After initial move-in, with new occupant and once per year concurrently.
	Downtown	2010	2011	54				
	Stoddard Johnston	2012	2012	57				
	Parkland	2013	2013	53				
	Riverport	2017	2017	64				
	Scattered Site Locations	2021	2021	10				
	Medical Center	2024	2024	60				
House of Ruth	Glade House	2018	2018	10	LMHA will allocate vouchers to the House of Ruth to assist individuals who are homeless and HIV-positive, combining housing with wraparound social service support services, including: · A safe, drug and alcohol-free community living environment; · Intensive case management; · Group and individual mental health counseling;	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used. After initial move-in, with new occupant and once per year concurrently.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					· Intensive outpatient substance abuse treatment; · Life skills education; and, · Transportation assistance. Special Referral Program participants will be required to live at the House of Ruth's Glade House, a single-room occupancy facility for two years, after which time vouchers become fully portable. Inspections will be conducted with each new occupant and once per year concurrently.			
	Red Key Landing	2025	2025	38	Households at 30% of AMI that contain a member with HIV			
Kentucky Housing Corporation	Scattered Site Locations	2016	2016	10	Vouchers are allocated to the Kentucky Housing Corporation. These vouchers are available to low-income households where a family member meets one of the following criteria: 1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals 2. Persons with severe mental illness who are at risk of institutionalization 3. Persons with disabilities exiting nursing homes and intermediate care facilities for individuals with intellectual or other developmental disabilities	Full portability upon program completion	No	No: Traditional inspection protocol.
Wellspring	Youngland Avenue	2012	2012	5	LMHA will allocate vouchers to households with members with severe mental illness, if they reside at Wellspring's Youngland Ave. 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 to be Mainstream Program participants.	Full portability upon program completion	Yes	Yes: For initial lease-up, C.O. is used.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	Bashford Manor – Newburg	2012	2012	8	LMHA will allocate vouchers to households with members with severe mental illness, as long as they initially reside at Wellspring's Bashford Manor / Newburg facility, while they are participating in the program. Referrals accepted for this initiative are considered to be Mainstream Program participants.		No	
	Scattered Site Locations	2016	2016 2021 2023	10 10 55	Vouchers are allocated to Wellspring for families with members with severe mental illness. These vouchers are only issued to households that are not eligible for an Olmstead voucher. Wellspring continues to provide case management / peer specialist services to all clients utilizing these vouchers.		No	
Louisville Metro Government Office of Resilience and Community Services	Scattered Site Locations	2019	2019 2021 2023	10 20 20	LMHA will allocate vouchers to individuals and families experiencing homelessness. The Office of Resilience and Community Services (RCS) connects individuals and families in shelters to intensive wrap around services, training, and job connections. As housing is such a basic need, it is anticipated that providing the Housing Choice Vouchers will increase the rate of attainment of self-sufficiency for program participants.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Home of the Innocents	Home of the Innocents	2019	2019 2021	10 10	LMHA will allocate vouchers to homeless youth ages 18-24 and their dependents who are referred by the Home of the Innocents. Home of the Innocents (the Home) is where Louisville's vulnerable children and youth find emotional, physical, and intellectual support that can transform their lives. The Home provides the community with a range of important residential, treatment and community-based programs.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Volunteers of America Mid-States	Scattered Site Locations	2020	2020	50	LMHA will allocate vouchers to women recovering from substance abuse disorders and who are pregnant and/or parenting. Specifically, vouchers will be allocated to women participating in the VOA Mid-States'	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used. Inspection with new occupant and

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
					Transitional Living for Woman program and who meet eligibility requirements in Louisville.			once per year concurrently.
	Monarch Station (to be developed)		2023	20	VOA Mid-states will provide supportive housing for those experiencing homelessness and low-income families in the Louisville area. VOA will provide intensive, voluntary services in line with the Moving Up strategy.			
	Scattered Site Locations		2025	180	Low-income households that include a member who is a veteran, including graduates of Unity House and Freedom House.			
Catholic Charities of Louisville	Scattered Site Locations	2021	2021	20	To serve families enrolled in the following programs: o Bakhita Empowerment Initiative; o Migration and Refugee Services; o Sister Visitors Center; o Community Support Services; and o Common Table Culinary Arts program.	Full portability upon program completion	No	No: Traditional inspection protocol.
			2024	30				
Joshua Community Connectors/ Joshua Tabernacle Missionary Baptist Church	Scattered Site Locations	2021	2021	20	LMHA will allocate vouchers to clients of the Russell neighborhood that are at risk of homelessness. Joshua Community Connectors provide case management and referral to physical and mental health providers, employment readiness training, and wraparound social services over the course of a 12-month period.	Full portability upon program completion	No	No: Traditional inspection protocol
			2023	20				
Mattingly Edge	Scattered Site Locations	2021	2021	10	Vouchers are allocated to Mattingly Edge which provides housing location and support services for individuals with intellectual and/or physical disabilities who are transitioning out of congregated residential settings.	Full portability upon program completion	No	No: Traditional inspection protocol
My Chosen People	Scattered Site Locations	2021	2021	10	Vouchers are allocated to My Chosen People which provides mental health treatment, substance abuse treatment, employment search and placement, and case management to pregnant women and individuals released from incarceration. Also to homeless households.	Full portability upon program completion	No	No: Traditional inspection protocol
			2023	10				
			2024	10				
			2025	70				

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
Boys and Girls Haven	Scattered Site Locations	2022	2022	10	LMHA will allocate vouchers to the Boys and Girls Haven Independence Readiness (IR) Program, which provides intensive case management and life skills preparedness for foster youth aged 18 – 21 years old and who are transitioning out of residential programming, transitional living, or therapeutic foster care.	Full portability upon program completion	No	No: Traditional inspection protocol
			2023	10				
Kentuckiana Builds/Kentuckiana Works	Scattered Site Locations	2022	2022	10	LMHA will allocate vouchers to Kentuckiana Work's Kentuckiana Builds, which provides employment readiness services in partnership with the Louisville Urban League and the state Department of Education. Participants are generally over the age of 24, are housing insecure, and participate in construction training in addition to wraparound services.	Full portability upon program completion	No	No:
Kentucky Youth Career Center/Kentuckiana Works	Scattered Site Locations	2022	2022	10	LMHA will allocate vouchers to the Kentuckiana Work's Kentucky Youth Career Center (KYCC), which provides education and employment services to young adults ages 16 – 24 experiencing barriers such as lack of high school diploma or GED, court-involvement, and/or homelessness. KYCC provides case management, supportive services, and incentives to help young adults reach their goals. For example, programs include Workforce Education, internal or links to external occupational skills certification programs, and GED services.	Full portability upon program completion	No	No: Traditional inspection protocol
Louisville Metro Government Office of Safe and Healthy Neighborhoods	Scattered Sites	2022	2022	10	Vouchers are to be utilized for participants who are in unstable and/or unsafe housing conditions due to being victims of gun violence. The program includes wraparound services from law enforcement, social services providers, and community members.	Full portability upon program completion	No	No
			2023	10				
			2025	10				
St. John Center	Scattered Site Locations	2022	2022	10	LMHA will allocate vouchers to the St. John Center, which provides case management and	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used.

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	Supportive Housing location (to be developed)		2023	58	housing location services for individuals aged 24-55 that are experiencing homelessness.			
Zora's Cradle	Scattered Site Locations	2022	2022 2024	10 20	LMHA will allocate vouchers to Zora's Cradle, which provides case management, therapeutic services, and assistance with securing community-based resources to pregnant or post-partum women who are currently or at risk of experiencing homelessness.	Full portability upon program completion	No	No: Traditional inspection protocol
Goodwill Industries of Kentucky, Inc.	Scattered Site Locations	2022	2022	10	LMHA will allocate vouchers to the Ignite Program, a partnership between Goodwill and Jefferson Community and Technical College, which provides job training and supportive services for at-risk youth ages 18-24.	Full portability upon program completion	No	No: Traditional inspection protocol
Louisville Metro Police Department (LMPD)	Scattered Site Locations	2022	2022 2023 2024 2025	10 10 10 10	LMHA will allocate vouchers to LMPD for the relocation of victims or witnesses of criminal activity.	Full portability upon program completion	No	No: Traditional inspection protocol
Hope Buss	N/A	2023	2023	10	LMHA will allocate vouchers to Hope Buss, a local non-profit who provides emergency assistance to families in crisis.	Full portability upon program completion	No	No: Traditional inspection protocol
Kentucky Refugee Ministries	N/A	2023	2023	10	LMHA will allocate vouchers to Kentucky Refugee Ministries, an organization which supports the resettlement of eligible refugees and immigrants and provides comprehensive case management including employment and language services, and cultural orientation.	Full portability upon program completion	No	No: Traditional inspection protocol
YouthBuild Louisville	N/A	2023	2023	10	LMHA will allocate vouchers to YouthBuild Louisville, an organization that assists young people in meeting significant life goals, such as preparing for college and careers, by providing services in education, vocational training, community service, case management, placement, and post-graduation support.	Full portability upon program completion	No	No: Traditional inspection protocol

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
Feed Louisville	N/A	2023	2023	10	Those with severe, persistent mental illness, those with substance use disorders, and the chronically homeless	Full portability upon program completion	No	No: Traditional inspection protocol
Kentucky Department for Behavioral Health	N/A	2023	2023	60	Individuals with severe & persistent psychiatric illness.	Full portability upon program completion	No	No: Traditional inspection protocol
Kentucky Department for Health and Family Services (Partnership for Families)	N/A	2023	2023	50	Families where housing is the only remaining issue preventing reunification of child(ren) with parents or child(ren) being removed from household.	Full portability upon program completion	No	No: Traditional inspection protocol
New Life Directions Ministries	Dixie Highway location (to be developed), Scattered Site	2023	2023	20	Homeless parents and their children	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used.
Option to Success	N/A	2024	2024	8	Homeless clients leaving their transitional housing program	Full portability upon program completion	No	No: Traditional inspection protocol
Louisville Metro Government Office of Housing and Community Development	212 E. College St. (to be developed) & 1515 Cypress St., Scattered Site	2024	2024	37	Homeless families and others in crisis or in unstable housing situations	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used.
REBOUND, Inc.	1622 W. Market St. (to be developed)	2024	2024	15	Low-income households	Full portability upon program completion	No	Yes: For initial lease-up, C.O. is used.
Peace Education Program	N/A	2024	2024	10	Survivors of violence needing emergency housing and/or wanting to move from a high risk environment	Yes	No	No: Traditional inspection protocol

Organization	Site	FY Proposed	FY Implemented	No. of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
Up for Women and Children	N/A	2024	2024	10	Homeless families	Yes	No	No: Traditional inspection protocol
Churchill's House of Hope	N/A	2025	2025	10	Households that include a homeless pregnant person	Yes	No	No: Traditional inspection protocol
Pushing Forward, Inc.	N/A	2025	2025	10	Households that include a member who has suffered a spinal cord injury	Yes	No	No: Traditional inspection protocol
ZeroV (Kentucky Domestic Violence Association, Inc.)	N/A	2025	2025	35	Households that include a Survivor(s) of domestic violence, dating violence, stalking, and/or sexual assault and that are exiting ZeroV's Rapid Re-Housing Program	Yes	No	No: Traditional inspection protocol
Inge's House	913 & 915 S. 1st St. & Scattered Site	2025	2025	10	Households that include a woman under a cancer treatment plan.	Yes	No	No: Traditional inspection protocol

Activity #2006-1: MTW Homeownership Program
(Formerly Activities #3-2006, #13-2009, and #11-2009)

Plan Year Approved, Implemented, Amended

- Amount and Distribution of HCV Homeownership Assistance: Approved and implemented FY 2006.

- HCV Homeownership Program – Exception Payment Standards: Approved and implemented FY 2009; amended in FY 2017.

- Flexibility in Third-Party Verification for HCV Homeownership: Approved and implemented FY 2009.

Description/Update

LMHA has developed and implemented several MTW policies aimed at expanding homeownership opportunities for low-income families. Following is a description of LMHA's MTW homeownership policies.

Using MTW flexibility, LMHA developed and implemented the following policies:

- ***Amount and Distribution of HCV Homeownership Assistance:*** Utilization of a two-bedroom payment standard for all one-bedroom eligible HCV Homeownership households.

- ***HCV Homeownership Program – Exception Payment Standards:*** Adjustment of payment standards for the HCV Homeownership Program to 120% of Fair Market Rent in high opportunity census tracts that LMHA has designated as exception payment standard areas.

Exception census tracts are determined by analyzing 5-Year American Community Survey data published by the U.S. Census Bureau. When this activity was first implemented in FY 2009, an exception census tract was defined as one where the *Owner-Occupied Median Value* was greater than **100%** of the same value for the Metropolitan Statistical Area (MSA) as a whole. Post implementation of this activity, the clear majority of Homeownership Program participants (nearly 90%) were still purchasing houses in non-exception payment standard areas. To boost participants' buying power in areas of opportunity, in FY 2016 LMHA increased the number of exception census tracts by re-defining the criteria to encompass any census tract where the *Owner-Occupied Median Value* exceeded **80%** of the *Owner-Occupied Median Value* for the Louisville MSA as a whole.

- ***Flexibility in Third-Party Verification for HCV Homeownership:*** Once approved for the HCV Homeownership Program, families have eight months to execute and close on a proposed sales agreement. Under this policy, the income verification completed during the program application process is valid for eight months, i.e. staff no longer must re-verify income for families who take more than 60 days to close on a sale.

In FY 2023, LMHA made several non-significant changes to this activity:

- LMHA may provide homeownership assistance to families if they include an adult member working between at 25-29 hours a week and earning at least 175% of the minimum wage. Families must meet all other eligibility requirements of the MTW Homeownership program to qualify for assistance. LMHA may further adjust this minimum requirement in future fiscal years. Please note that families that include an adult member working 30 or more hours a week continue to be subject to the existing regulatory minimum for earnings.

- LMHA began a pilot program to assist eligible families in becoming homeowners and landlords. While no households have yet been assisted as of March 2024, LMHA plans to provide HCV homeownership assistance to families who purchase a duplex through the REBOUND homeownership initiative. LMHA established a limited admissions preference for the HCV homeownership program for families participating in the REBOUND program. HCV homeownership assistance provided by LMHA is limited to the unit which the eligible family resides in (homeownership unit). LMHA calculates homeownership assistance for the homeownership unit consistent with MTW homeownership policies.

  In order to support the homeowner in affording their total mortgage costs for the duplex, LMHA provides an HCV admissions preference to eligible low-income families to lease the second unit (rental unit). This admissions preference is only provided during the period which the homeowner receives monthly HCV homeownership assistance for the homeownership unit.

  LMHA will track homeowners' stability and success in participating in the pilot duplex program and evaluate the program annually. LMHA may expand this pilot initiative in future fiscal years to include additional non-profit partners.

- When a family joins the HCV Homeownership Program, their unit is typically inspected twice, once through a traditional HQS inspection and a second time by a professional inspector. LMHA will waive the traditional HQS inspection and families may instead rely on the inspection performed by a professional inspector to evidence that the unit meets HQS standards.

  Under this protocol, the unit must be inspected by an independent professional inspector selected by and paid by the family. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components. LMHA will not require the family to use an independent inspector selected by the Housing Authority, although the inspector must be certified by an organization approved by LMHA. The independent inspector will not be a Housing Authority employee or contractor, or other person under control of the Housing Authority.

  The family is required to provide a copy of the inspection report to LMHA. The Housing Authority will not commence homeownership assistance for the family until it has reviewed the inspection report of the independent inspector. Even if the unit otherwise complies with HQS (and may qualify for assistance under the Housing Authority's tenant-based rental

voucher program), the Housing Authority has discretion to disapprove the unit for assistance under the homeownership option because of information in the inspection report.

- LMHA may use different payment standard schedules for the homeownership option and the rental voucher program. As payment standard schedules are included in the agency's HCV Program Administrative Plan, all updates to the schedule are subject to public comment and available for public review.

Planned Non-Significant Changes

LMHA plans to implement Small Area Fair Market Rents (SAFMR) effective January 1, 2025. Rather than base exception payment standard areas on census tracts, as is the current practice, the Housing Authority will move to a zip code-based system, allowing payments standards to go up to 120% of SAFMR in opportunity areas.

Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	**As of FY 2008:** 6 hours (12 verifications x 0.5 hours)	0 hours		
HC #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 because of the activity (increase).	0	45		
HC #6: Increase in Homeownership Opportunities				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households that purchased a home because of the activity (increase).	0	45		

Planned Significant Changes

No significant changes are planned.

Activity #2007-1: Streamlined Recertification Process
(Formerly Activity #4-2007, Alternate Reexaminations)

Plan Year Approved, Implemented, Amended
Approved FY 2007; implemented in HCV Program FY 2007; implemented in Public Housing Program FY 2008; amended FY 2012; amended FY 2020; amended FY 2024.

Description/Update
This activity allows LMHA to conduct a re-certification of certain Housing Choice Voucher (HCV) and Public Housing households biennially or triennially instead of annually. This includes households in the Project-Based Voucher (PBV) program.

Under this activity as originally implemented, biennial recertifications were completed for HCV households where the head, co-head or spouse was elderly or over age 55 and disabled and the only source of income for the household was Social Security (SS) or Disability (SSI). In the Public Housing program, each year 50% of elderly/disabled families received a full recertification of eligibility on the anniversary of their lease-up date.

LMHA has since made several changes to further streamline the recertification process:

- LMHA recertifies HCV families at least biennially.

- The majority of Public Housing families are recertified biennially. Households whose only source of income is from SS, SSI and/or pension, as well as those on flat rent, are recertified every three years (Families' flat rent is not increased between triennial recertifications). Certain households living in units with alternative funding sources, such as LIHTC, continue to be recertified annually (although some receive a streamlined recertification).

- LMHA also added a further streamlining benefit to the recertification process by accepting documents that are not more than 120 days old when received by LMHA.

Typically, in the Public Housing Program, public housing authorities are required to inform Public Housing residents of the option of paying income-based rent or a flat rent on an annual cycle. As most Public Housing residents have now moved to a biennial or triennial recertification schedule, it is more efficient to coordinate notification in accordance with their new recertification cycle. Therefore, LMHA will provide notice at the time of reexamination.

Also, per HUD's Final Rule, "Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103, and 104," which was published in the Federal Register on February 14, 2023, effective January 1, 2024, current regulations regarding interim recertifications will be amended to read as follows:

> The PHA must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income (as defined in § 5.611 of this title) has changed by an amount that the PHA estimates will result in an increase

of ten percent or more in annual adjusted income or such other amount established by HUD through notice, except:

(i) The PHA may not consider any increase in the earned income of the family when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction under paragraph (c)(1) of this section during the certification period; and

(ii) The PHA may choose not to conduct an interim reexamination in the last three months of a certification period.

LMHA plans to keep families whose income (excluding earned income) increases by 10% or more on their regular recertification cycle and will not conduct an interim reexamination.

LMHA understands that MTW flexibility cannot be used to amend the community service requirement. However, the Housing Authority requests that it be allowed to verify fulfillment of the community service requirement at the time of recertification, even if the family is not on an annual recertification cycle. This will further the MTW statutory goal to reduce cost and achieve greater cost effectiveness in Federal expenditures.

Planned Non-Significant Changes

LMHA will limit interim reexaminations for both the Public Housing and HCV programs to two per recertification cycle (for households on a biennial recertification schedule only). Elderly and disabled households will be exempt from this limitation and able to request an interim reexamination at any time. Households that add a family member through addition of a live-in aide or foster child/adult or through the birth of a child or adoption will also be exempted.

LMHA will allow a family to request an additional interim reexamination if the family experiences a long-term loss of income (90 days or longer) due to circumstances beyond the family's control.

Examples of such circumstances include:

- A medical condition (or death) that prevents an adult family member from working when loss of employment is not covered by paid medical benefits; or
- Loss of employment due to reduction in work force or closure of the place of employment where employment income loss is not covered by severance pay or separation benefits.

Families who meet the criteria listed above must submit their request in writing via mail, fax, or email to their Property Management Office (Public Housing) or Housing Specialist (HCV Program) stating both the reason for the hardship and its expected duration. Requests will be considered on a case-by-case basis and weighed against other local resources available to the family. Families granted an additional interim reexamination will be allowed to receive an

income decrease following LMHA's standard policies and procedures. No more than one such exemption will be granted to any given family more than once in a 12-month period.

Planned Changes to Metrics/Data Collection
An additional CE#2 metric has been added to account for staff time savings due to the decrease in interim reexaminations.

Metrics

CE #2: Staff Time Savings (Regular Recertifications)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total time to complete the task prior implementation: 10,827 hours Number of Regular Recertifications PH: 2,672 HCV:8,155 Time per recertification: 1 hour	Total time to complete the task: 8,195 hours Number of Regular Recertifications PH: 1,594 HCV: 6,601 Time per recertification: 1 hour		
CE #2: Staff Time Savings (Interim Recertifications)				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total time to complete the task prior implementation: 2,698 hours Number of Interim Recertifications PH: 183 HCV:2,515 Time per recertification: 1 hour	Total time to complete the task: 2,023 hours Number of Interim Recertifications PH: 137 HCV: 1,886 Time per recertification: 1 hour		

Data Source: Yardi

Planned Significant Changes
No significant changes are planned.

Activity #2008-1: Occupancy at Elderly Developments
(Formerly Activities #10-2008 and #23-2010)

To increase occupancy rates at several of LMHA's elderly/disabled developments, LMHA, using MTW flexibility, developed and implemented leasing incentives and a revised definition of elderly. The following is a description of the MTW policies, which address this important leasing objective. See Activity 2019-1 regarding elderly families and the Project Based Program.

Plan Year Approved, Implemented, Amended

Local Definition of Elderly: Approved and implemented FY 2008.

- Lease-Up Incentives for New Residents at Dosker Manor: Approved and implemented 2010.

Description/Update

Local Definition of Elderly
Using MTW flexibility, LMHA has established the following local definition of "elderly": any family whose head of household, co-head, or spouse is age 55 or above. Under existing HUD regulations, within the Public Housing Program, this definition is only used to determine eligibility for occupancy at the Housing Authority's elderly/disabled high-rise towers. In all other public housing contexts, "elderly" begins at age 62.

Lease-Up Incentives for New Residents at Dosker Manor
Additionally, LMHA provides lease-up incentives to new residents at Dosker Manor, an elderly/disabled high-rise located in downtown Louisville that was experiencing particularly low occupancy rates. New residents receive a waiver of the initial deposit and the first month is rent-free. The incentives have successfully increased occupancy rates at Dosker Manor.

Planned Non-Significant Changes
No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

HC #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 because of the activity (increase).	0	50		

Planned Significant Changes
No significant changes are planned.

Activity #2009-1: Streamlined Development and Acquisition
(Formerly Activities #18-2009 and #26-2011)

LMHA has implemented several initiatives to streamline the development and acquisition processes. The initiatives result in cost savings to the Agency as well as expedite timelines associated with development and acquisition activities.

Plan Year Approved, Implemented, Amended

- Simplification of the Public Housing Development Submittal: Approved and implemented FY 2009.
- Acquisition of Mixed-Income Sites for Public Housing: Approved and implemented FY 2011.
- Acquisition of Sites for PBV development and/or preservation: Approved and implemented FY 2020.

Description/Update

Simplification of the Public Housing Development Submittal
LMHA has simplified the proposal process for each acquired or developed Public Housing property. When applicable, twice yearly, LMHA submits a six-month report summarizing the agency's acquisition and development activities to the HUD Louisville Field Office. The activity reduces the amount of time staff spends preparing development submittals and reduces the average length of time to close on a property.

Acquisition of Mixed-Income Sites for Public Housing and Sites for PBV Development
LMHA also uses MTW flexibility to revise the acquisition process. The revised policy authorizes LMHA to 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. Acquired properties must meet all of HUD's other requirements, including site selection requirements.

While the policy was proposed and implemented in the FY 2011 Plan, LMHA has not utilized the flexibility to date. LMHA will utilize the regulatory flexibility provided by this activity if HUD has not responded to LMHA's request for authorization within 10 days of the submittal date. Where applicable, LMHA will use this MTW authority in FY 2025.

In FY 2020, LMHA, including its affiliate LMHA Development Corporation (LMHADC), extended the scope of this activity to include acquisition of sites and/or units for PBV development and/or preservation.

Planned Non-Significant Changes
No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

CE #1: Agency Cost Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total cost of task in dollars (decrease).	**As of FY 2008:** $12,249 (9 submittals x 25 hours x $54.44/hour)	$930 (2 submittals x 7.5 hours x $62.00/hour)		
CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	**As of FY 2008:** 225 hours (9 submittals X 25 hours)	15 hours (2 submittals x 7.5 hours)		
HC #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 because of the activity (increase)	**0**	10		

Planned Significant Changes

No significant changes are planned.

Activity #2011-1: Housing Choice Voucher Child Care Deductions Policy
(Formerly Activity #27-2011)

Plan Year Approved, Implemented, Amended

Approved and implemented in FY 2011.

Description/Update

This activity, which applies to the Housing Choice Voucher and Project Based Voucher programs, allows for the deduction of verified ongoing child-care expenses from a working household's gross income when determining income eligibility. To qualify for the adjustment, the family must include a head of household, co-head, and/or spouse who is employed at the time of eligibility screening. While this activity was designed to increase housing choice for working families with children who may be struggling to make ends meet, LMHA has determined that it also achieves the HUD Standard metrics of "Reducing the per Unit Subsidy Costs" for participating households and "Increases Agency Rental Revenue."

Planned Non-Significant Changes
No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Housing Choice subsidy per household affected by this policy in dollars (decrease).	**As of FY 2010:** No HHs affected by policy	$532		
SS #7: Increase in Agency Rental Revenue*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total household contributions towards housing assistance (increase)	As of FY 2019** $267	$709		
**Average total tenant payment.* ***2019 was the first year that a baseline for this metric was established.*				

Planned Significant Changes
No significant changes are planned.

Activity #2014-1: Public Housing Sublease Programs
(Formerly Activities #37-2014 and #29-2015)

Plan Year Approved, Implemented, Amended

- Accessible Units Sublease Agreement with University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC*)*: Approved and implemented FY 2014. *(Transitioned from University of Louisville's Frazier Rehab Institute in FY 2021)*

- Public Housing Sublease Agreement YouthBuild Louisville: Approved and implemented FY 2015.

Description/Update

Using MTW flexibility LMHA has developed and implemented sublease programs. The programs use Public Housing units for temporary housing for specific populations in need. Specifically, LMHA currently subleases units to the following organizations:

- ***University of Louisville's Kentucky Spinal Cord Injury Research Center (KSCIRC)***
  Fully accessible units are subleased as temporary housing for Spinal Cord Injury (SCI) research participants. The units are transitional housing provided for up to 12 months per family. KSCIRC is responsible for verifying that the family is eligible to live in the unit (e.g. a program participant, household income is at or below 80% AMI). KSCIRC leases the apartments from LMHA and will pay monthly rent approximately equal to 30% of monthly SSI for one person. KSCIRC uses a modified version of LMHA's Public Housing lease as its tenant sublease. KSCIRC has a full-time social worker who is responsible for connecting SCI research participants with applicable community resources and supports as well as financial assistance grants/opportunities to assist households in leaving the program.

- ***YouthBuild Louisville***
  YouthBuild Louisville (YBL) subleases Public Housing units to provide temporary housing for low-income YBL participants who are experiencing homelessness. LMHA subleases up to three 2-bedroom apartments for the use of YBL participants (and their families) and facility space for the YBL program. Units are provided to YBL on an as-needed basis. This activity uses Public Housing as an incentive for young people to enroll in the YBL job-training program, which increases their chances of becoming self-reliant.

  For each month a unit is occupied by an YBL program participant, YBL pays LMHA $60. YBL certifies that students are income eligible upon entry to the YBL program through the application process and follow-up verification through local and state subsidy programs. The participant and their household may continue to live in the unit if they are active in the YBL program. Upon graduation, the household may elect to receive preference for a Public Housing unit.

  All participants residing in the subleased Public Housing units must meet basic Public Housing Program eligibility criteria. LMHA staff verifies that the YBL program participant is eligible for this MTW initiative.

In FY 2025, LMHA anticipates utilizing two public housing units for the University of Louisville's Kentucky Spinal Cord Injury Research Center and three units for the YouthBuild Louisville program.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Employed Full-Time	**As of FY2014:** 0	2		
Employed Part-Time	**As of FY2014:** 0	1		
Enrolled in an Educational Program	**As of FY2014:** 0	0		
Enrolled in a Job Training Program	**As of FY2014:** 0	2		
Unemployed	**As of FY2014:** 0	3		
SS #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).	**As of FY 2014:** 0	4		
*SS #8: Households Transitioned to Self Sufficiency**				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency (increase).	**As of FY 2014:** 0	1		
**Self-Sufficiency is defined as a participant exiting the program for any other reason than termination of subsidy/participation.*				
HC #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 because of the activity (increase).	**As of FY 2014:** 0	5		
HC #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 because of the activity (increase).	**As of FY 2014:** 0	4		

Planned Significant Changes
No significant changes are planned.

Activity #2014-2: Housing Choice Voucher Program Rent Increase Limit
(Formerly Activity #39-2014)

LMHA removed the rent increase limit during FY 2024. This activity will be closed out in the agency's FY 2024 MTW Annual Report.

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2014.

Description/Update

Under this MTW activity, which applies to the Housing Choice Voucher (HCV) Program (including Project-Based Vouchers), LMHA originally placed a 2% cap on annual contract rent increases for units where the tenant was already receiving HCV rental assistance. At contract renewal, LMHA limited the landlord's requested rent to whichever was least: 102% of the previous contract rent for the same tenant or the exception payment standard.

In FY 2023, LMHA modified this activity to limit the landlord's requested rent to the lower of: the average increase in FMRs or the applicable exception payment standard. LMHA applies a rent increase floor of 2% in the event that the average change in payment standards is less than 2%. To calculate the average increase in FMRs, LMHA determines the average year-to-year percent change for one, two, three, and four bedroom units, which reflect the majority of units in the HCV program. Averages are then rounded down to the nearest whole number.

Under this activity, LMHA conducts reasonable rent (RR) determinations on a random sample of the units where rent increases were requested. LMHA uses the SEMAP sample size requirements to dictate the number of RR determinations to be completed and has established the universe as the number of units with requested rent increases. If the rent on more than 20% of sampled units, because of application of the policy, is not reasonable when compared with the RR determination, LMHA will conduct RR determinations on double the initially established sample size. LMHA will monitor outcomes and may modify this policy to ensure rents are reasonable, i.e. revise sample size requirements.

As rents continued to escalate rapidly in the Louisville Metro area, LMHA became concerned that artificially capping contract rent increases might force existing residents to move if owners were unwilling to accept the capped rent increase. As a result, the Housing Authority removed the rent increase cap during FY 2024.

Planned Non-Significant Changes
LMHA removed the rent increase limit during FY 2024. This activity will be closed out in the agency's FY 2024 MTW Annual Report.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

SS #6: Reducing Per Unit Subsidy Costs for Participating Households				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of Housing Choice subsidy per household affected by this policy in dollars (decrease).	**As of FY 2014*** $526	N/A (Activity ended)		
**FY 2014 is the earliest year for which data is available.*				
*SS #7: Increase in Agency Rental Revenue**				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
PHA rental revenue in dollars (increase).	**As of FY 2019**** $267	N/A (Activity ended)		
**Total tenant payment.* ***2019 was the first year that a baseline for this metric was established.*				

Planned Significant Changes

LMHA removed the rent increase limit during FY 2024. This activity will be closed out in the agency's FY 2024 MTW Annual Report.

Activity #2018-1: Preservation of Affordable Housing – Broader Use of Funds to Support Mixed-Income Housing

(Formerly known as Beecher Terrace Choice Neighborhood Initiative (CNI) Revitalization – Broader Use of Funds to Support the Development of Off-Site, Mixed-Income Replacement Housing, Activity #49-2018)

Plan Year Approved, Implemented, Amended

Approved and implemented FY 2018.

Description/Update

This activity allows LMHA to acquire unsubsidized units for development of affordable and mixed income housing. In some instances, acquired units will become PBV developments. As these units will not receive ongoing Section 9 operating subsidy, HUD approval of these acquisitions is not required. However, the units will still be targeted to households whose income does not exceed 80% of Area Median Income (AMI).

LMHA is currently using the flexibility under this activity primarily, but not exclusively, to pursue opportunities to acquire properties where the Housing Authority can provide off-site replacement housing for its current CNI Grant, awarded for the redevelopment of Beecher Terrace, without relying on a 3rd-party developer or owner.

In June 2019, LMHA's affiliate, LMHA Development Corporation (LMHADC), undertook the first acquisition under this activity and purchased Newbridge Place, a family apartment complex. LMHA provided an acquisition loan to LMHADC for the purchase price of Newbridge Place. LMHA undertook the acquisition of this property as a pilot project to determine whether this unique approach to the provision of replacement housing developments to include PHA-owned PBV acquisitions is indeed feasible. Now that the agency has "proof of concept," the Housing Authority may pursue additional acquisitions of this nature in furtherance of its CNI Transformation Plan commitments up to a maximum of 110 units.

To date, LMHA has utilized MTW funds to develop 205 tax credit units. As these units do not receive on-going Section 8 or Section 9 subsidy, LMHA will continue to comply with requirements set forth in PIH Notice 2011-45.

In FY 2025, LMHA will continue to look for acquisition opportunities, including but not limited to, the purchase of additional tax credit properties. Such acquisitions would not fall within the 110-unit cap placed on the purchase of PBV units in furtherance of the CNI Transformation Plan.

Planned Non-Significant Changes
No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

HC #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 because of the activity (increase).	**As of 2017:** 0	232		
** Total number of tax credit units developed by LMHA plus total number of Newbridge PBV units.*				
HC #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 because of the activity (increase).	**As of FY 2017:** 0	100		
** Projected number of households residing in tax credit units, excluding those households participating in HCV and those residing in the Newbridge PBV development.*				

Planned Significant Changes

No significant changes are planned.

Activity #2018-2: HCV Owner Leasing Incentive

(Formerly known as Increasing Housing Options for Relocating Beecher Terrace Families, Activity #2018-2)

Plan Year Approved, Implemented, Amended
Approved and implemented FY 2018; amended FY 2021

Description/Update
LMHA originally developed this activity to address the significant need for one-bedroom units in LMHA's jurisdiction, including among families relocating from the Beecher Terrace Public Housing development (relocation of these families was completed in FY 2020).

However, as Beecher Terrace resident relocation has been completed, this activity has been modified and expanded to address the need to attract new owners and lease quality rental units of all bedroom sizes in the HCV program. These modifications strengthen owner incentives to lease new units to HCV participants, and also to lease units in high opportunity areas.

Accordingly, LMHA revised and expanded this activity, in order to strengthen incentives for owners to make new units available for leasing to HCV program participants. To date, LMHA has implemented the following incentives for owners:

- **Modified Owner Incentive Fee:** Incentives are provided to owners who lease a new unit to an HCV family (i.e. unit has never been previously leased to another LMHA HCV participant). LMHA provides a one-time $500 payment for leasing a new unit, payable upon execution of a HAP contract. As the low inventory of one-bedroom units in the Louisville Metro area is still a significant challenge, LMHA also offers an *additional* $500 payment at the one-year anniversary of the HAP contract to owners who lease new one-bedroom units to HCV participants.

- **Vacancy Loss and Damage Loss Payments:** As another incentive to make new units available to HCV families, LMHA offers limited vacancy loss and damage payments to owners who lease a new unit to an HCV family.

  Vacancy loss payments are made available to owners whose tenants vacate the unit without notice or LMHA authorization, prior to the end of their lease term. To qualify for the vacancy loss payment, the unit owner must re-rent the unit to another HCV family within six months of the date that the owner notifies LMHA of move-out. Owners will be paid only for the length of time the unit was vacant, with a maximum payment equivalent to two months of HAP. In addition, LMHA will only reimburse owners to the extent that the lost rent is not covered by the security deposit (after being applied to any damages). Finally, owners must demonstrate a good faith effort to re-rent the unit to another HCV family during the period of vacancy.

  Example: Tenant A vacated a unit without providing notice. Owner A demonstrated good faith efforts to re-rent the unit to another HCV family, but the unit remained vacant for three months. After accounting for damages, Owner A had $400 remaining in security

deposit funds. In this case, LMHA would provide a vacancy loss payment equal to two months' HAP, minus the security deposit held. If the monthly HAP payment was $600, the vacancy loss payment would be $600 * 2 - $400 = $800.

LMHA will also provide damage loss payments to owners who agree to accept a reduced security deposit. The reduced security deposit will help mitigate the financial barriers families face at lease-up, reducing time for landlords to find a qualified HCV tenant. The reduced deposit must be equal to the lesser of one month of the tenant portion of the rent or $200. At move out, LMHA will award a damage payment for tenant caused damages up to a maximum amount of one month's contract rent, which is typically the normally required security deposit amount, minus any amount covered by the tenant security deposit.

Example: Tenant B had a tenant rent share of $150, and a total contract rent of $1,000. At lease-up, Owner B agreed to accept the lesser of one months' tenant rent share or $200 as a security deposit, resulting in a security deposit amount of $150. At move out, the unit had $900 of tenant caused damages. In this case, LMHA would provide a damage loss payment equal to the amount of damages (not to exceed the amount of one month's contract rent), minus the amount of the actual tenant security deposit. Therefore, the amount of the damage payment would be $900-$150 = $750. LMHA will hold the family accountable for any damage payments made on their behalf.

The following incentives have not yet been implemented, but LMHA reserves the right to do so in future:

- **Pre-Qualifying Unit Inspections:** As another incentive to lease new units, LMHA will offer pre-qualifying unit inspections for units new to the HCV program. These inspections will not be linked to a specific tenant and are intended to expedite the leasing process by minimizing inspection-related delays. After the inspection is conducted, unit owners will have up to 90 days to lease the unit to an HCV family.

- **Inspection Incentive for Units in Exception Payment Standard Areas:** Exception Payment Standard areas are generally located in high opportunity neighborhoods. The housing stock in these areas is typically newer and/or in better condition than in other areas of LMHA's jurisdiction. However, HCV participants in these areas face competition with market rate tenants, who do not have the same administrative requirements for lease-up and continued occupancy, including inspections. As a final incentive to increase the supply of available HCV units and opportunities for families, LMHA proposes to conduct biennial HQS inspections for all units located in approved Exception Payment Standard areas or units with a construction date of 1990 or later (normally LMHA conducts annual HQS inspections). This new policy is designed to reduce the administrative burden of inspections on landlords, which will increase the overall inventory of HCV units available to LMHA.

LMHA will partner with the Louisville Apartments Association, a landlord industry group, to promote these incentives to its members.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes to metrics/data collection are planned.

Metrics

HC #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	**As of FY 2017:** 84 months	36 months		
HC #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 because of the activity (increase).	132	185		

Planned Significant Changes
No significant changes are planned.

Activity #2019-1: Enhancements to Local Project-Based Voucher (PBV) Program

(Formerly Activities #51-2019 and #48-2018)

Plan Year Approved, Implemented, Amended

- Local Project-Based Voucher (PBV) Program: Approved and implemented FY 2018.

- Enhancements to Local Project-Based Voucher (PBV) Program: Approved and implemented FY 2019; amended FY 2020.

Description/Update

LMHA proposed, and HUD approved, revised project-based policies to help meet the requirements of LMHA's Beecher Terrace Choice Neighborhood Initiative (CNI) Implementation Grant as well as to provide additional housing choices for low-income households in high opportunity areas, incentivize developers to preserve or create affordable housing units and streamline the administration of PBVs.

Currently, PBV efforts are focused on replacing Beecher Terrace units; however, LMHA plans to utilize flexibilities included in this activity for the preservation and development of other affordable housing units in the future.

The following MTW flexibilities are included in LMHA's Enhancements to Local Project-Based Voucher (PBV) Program:

- PBV proposals may be selected based on any one of the following three methods:
    - The results of a previous competition (no MTW authority required);
    - Issuance of a Request for Proposals, which may be limited to a specific site or sites or to geographic areas that meet certain criteria (for example, non-impacted census tracts); or,
    - Selection of properties owned directly or indirectly by LMHA without a competitive process or prior HUD approval.

- Up to 100% of units within any given project may be awarded PBV assistance. However, in furtherance of the Housing Authority's commitment to the development of mixed-income housing, at its sole discretion, LMHA may limit the percentage of units that may be project-based at any given project to an amount less than 100%.

- When LMHA has received owner notice that the rehabilitated or newly constructed housing is completed, the Housing Authority will inspect the units to determine if the housing has been completed in accordance with the Agreement to Enter a HAP Contract (AHAP), including compliance with Housing Quality standards (HQS), except that in lieu of LMHA inspection of the units, the owner may submit the Certificate of Occupancy issued by Louisville Metro Government as evidence of compliance.

- For determining the order in which families on the Housing Authority's PBV waiting list are referred by LMHA to the owner of a project-based elderly or elderly/disabled building, an "Elderly Family" will be defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 55 years of age. It may include two or more persons who are at least 55 years of age living together, or one or more persons who are at least 55 years of age living with one or more Live-In Aides.

- The income eligibility limit for PBV units will be increased from 50% to 80% of Area Median Income (AMI) except in the case of PBV units that are subject to a lower income restriction due to limitations imposed by other 3rd-party funding sources (for example, units that also have low-income housing tax credits or funding awarded through the National Housing Trust Fund). In the case of funding sources that impose an income cap that falls between 50% and 80% of AMI, the maximum allowable income cap will be used. (For example, PBV units that also have low-income housing tax credits capped at 60% of AMI would have an income eligibility limit of 60% of AMI.)

- Revised local PBV payment standards that are equal to the greater of 110% of the Metropolitan Area Fair Market Rent (MAFMR) or 110% of the Small Area Fair Market Rent (SAFMR) schedules published annually by HUD.

- Local PBV Program Site-Specific Utility Allowances. LMHA will allow PBV owners to calculate site-specific Utility Allowances in accordance with the provisions of Notice PIH 2018-11 or successor notices, subject to LMHA's review and approval prior to implementation.

- Owner Managed Site Based Waiting Lists. This will allow individual owners participating in the LMHA's Enhancements to Local Project-Based Voucher (PBV) Program to maintain site-based waiting lists. LMHA will determine whether to allow owner-maintained, site-based waiting lists based on LMHA's assessment of each individual owner's management capacity. Owners will be required to adhere to fair housing, the Americans with Disabilities Act and other applicable federal guidelines including, but not limited to: providing public notification of waiting list opening and closings; providing community-wide notice of housing availability; providing reasonable accommodations; and, conducting the application process in compliance with LMHA's Language Access Plan. Subject to LMHA approval, tenant selection preferences may be adopted for individual projects in accordance with LMHA's Administrative Plan; however, post-revitalization, relocated Beecher Terrace households will continue to receive a lifetime admission preference for all units designated as Beecher Terrace replacement units, as well as PBV units at Gray & Clay and Roosevelt Apartments. Owners will forward applications nearing the top of the waiting list to LMHA, and LMHA will continue to maintain responsibility for eligibility determination.

- For PBV units that are also low-income housing tax credit (LIHTC) units, including those that have received conditional LIHTC approval, the Tenant Income Certification form will be used to verify income and assets for eligibility determinations and recertifications (both interim and regularly-scheduled).

- Waiver of Independent Entity Requirements for LMHA-Owned Units. This allows LMHA to directly perform the functions delegated to the independent entity for all LMHA-owned units, including the following: review of selection process (24 CFR 983.51(e)); unit inspections, exercise of contractual remedies for violation of the HAP contract and the provision of inspection reports to the HUD Field Office (24 CFR 983.103(f)); and, determination of rent to owner, including initial rent (24 CFR 983.301(g) and 983.303(f)). Requiring approval from an independent entity increases costs and creates potential delays in the availability of critically needed replacement housing units, while adding no measurable value to the process. Under this MTW activity, LMHA will process rent determinations, inspections, contract renewal and other necessary program transactions on LMHA-owned units in accordance with the policies and procedures applicable to all other units that are part of LMHA's Local PBV Program. In the future, LMHA will provide HUD with documentation related to LMHA-owned units upon HUD's request. Also, LMHA's transactions will continue to be subject to audit as part of the annual independent audit process.

- Expansion of Prior Competition Exemption. LMHA proposed and received approval to select without prior competition proposals for housing currently assisted with Low Income Housing Tax Credits (LIHTCs) or under a federal, State, or local government subsidy program if the project has been selected in accordance with the competitive requirements of the applicable funding source in the last 10 years. The original competitive selection of these projects cannot have involved any consideration that the project would receive PBV assistance.

- Allow existing, newly constructed and substantially rehabbed units receiving subsidy to be located "in the agency's jurisdiction, including within, but not limited to, the following types of urban areas: (1) an area of revitalization that has been designated as such by the governing jurisdiction, including Redevelopment Areas and Enhanced Enterprise Communities, (2) an area where public housing units were previously constructed and were demolished, (3) a racially or economically impacted area where the agency plans to preserve existing affordable housing, (4) in connection with a HOPE VI or other HUD funded master planned development, (5) in areas where a needs analysis indicates that subsidized housing represents a low percentage of the total number of housing units in the area, or (6) relocating units to an area with a lower concentration of public housing units." This flexibility allows LMHA and duly selected PBV owners/developers to pursue the development and/or acquisition of land and existing buildings. LMHA plans to use MTW site selection flexibility for PBV units that are not being developed as off-site replacement units in conjunction with the Choice Neighborhoods grant.

- Damage loss payments. LMHA will also provide damage loss payments to owners who agree to accept a reduced security deposit. The reduced security deposit will help mitigate the financial barriers families face at lease-up, reducing time for landlords to find a qualified HCV tenant. The reduced deposit must be equal to the lesser of one month of the tenant portion of the rent or $200. At move out, LMHA will award a damage payment for tenant caused damages up to a maximum amount of one month's contract rent, which is

typically the normally required security deposit amount, minus any amount covered by the tenant security deposit.

- To expedite proposal selection for existing units, LMHA may examine the proposed site and inspect all or a selection of not less than 5 or 25% of existing housing units before the proposal selection, in which case inspected units must substantially comply with the Housing Authority's criteria for decent, safe, and sanitary housing before the proposal selection date. LMHA will inspect all housing units before executing the HAP contract and will not enter into a HAP contract covering any unit that does not fully comply with the Housing Authority's criteria for decent, safe, and sanitary housing.

- Under the traditional PBV program, assistance cannot float among units within a project. Instead, the location of each contract unit (i.e., unit number) and the area of each contract unit (square footage) must be designated in the HAP contract. RAD has established an alternative to this PBV program requirement. Specifically, under RAD, upon a request from an owner of a project to the Contract Administrator that will administer RAD PBV assistance for the Covered Project, HUD will permit PBV assistance to float among units within the project having the same bedroom size and features. For example, assistance may float from one 2-bedroom unit to another 2-bedroom unit or from one unit that meets Uniform Federal Accessibility Standards to another unit that also meets such standards and has the same bedroom size. The RAD PBV HAP contract must include only the total number and type of units in a project that are covered by the contract; the location and square footage of individual units are not listed in the RAD PBV HAP contract. From the time of the initial execution of the PBV RAD HAP contract, a property must maintain the same number and type of UFAS accessible units. This flexibility has been extended to the Housing Authority's non-RAD PBV units.

- LMHA, at its sole discretion, will allow pre-qualifying unit inspections of PBV units. The pre-inspection will be conducted within 90 days of the participant occupying the unit. The participant will continue to be allowed to request a complaint inspection at any time.

Planned Non-Significant Changes

LMHA will permit the Tenant Income Certification form to be used to verify income and assets for eligibility determinations and recertifications (both interim and regularly-scheduled) at PBV developments that use a third-party compliance reviewer to monitor income and asset calculations.

Planned Changes to Metrics/Data Collection

There are no planned changes to metrics or data collection.

Metrics

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

Total cost of task in dollars (savings).	$2,100 cost 2 developments @$400 = $800 preselection verification 27 units @ $48.14/inspection = $1,300	1 development @$500 preselection verification		
CE #4: Increase in Resources Leveraged				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Amount of funds leveraged in dollars (increase).	As of FY 2017: $0 (no PBV units)	$70,760,742 ($236,658 (TDC for a 2-BR walkup) x 299 units)		
****Represents average TDC for a 2 BR unit times the number of new PBV units anticipated in the fiscal year.*				
HC #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 because of the activity (increase).	As of FY 2019: 0 (no PBV units)	299 units		
** Represents the total number of new PBV units by the end of the fiscal year.*				
HC #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on wait list in months (decrease).	**As of FY 2017:** 65 months	11 months		
HC #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.	**As of FY 2017:** 23 households moved (no assistance lost)	1,211 households		
** Represents the total number of all new and existing PBV units*				
HC #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	As of FY 2019: 0 (no PBV units)	1,211 households		

of opportunity because of the activity (increase).				
* *Represents the total number of all new and existing PBV units*				

Planned Significant Changes

No significant changes are planned.

Activity #2020-1: Rent Simplification

Plan Year Approved, Implemented, Amended

- Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – HCV Program
  (Formerly Activity #40-2014, approved FY 2015 and implemented FY 2016)

- Elimination of the Standard Earned Income Disregard
  (Formerly Activity #32-2012, approved FY 2012; implemented in HCV Program FY 2012; and implemented in Public Housing Program FY 2014)

- Standard Medical Deduction
  (Formerly Activity #8-2008, approved and implemented FY 2008, amended FY 2021)

- Earned Income Disregard for Elderly Families
  (Formerly Activity #6-2008, approved and implemented FY 2008)

- Asset Policy
  (Approved and implemented FY 2020)

- Exclusion of Full-Time Student Income
  (Approved and implemented FY 2020; discontinued FY 2023)

- Exclusion of Adoption Assistance Payments
  (Approved and implemented FY 2020; discontinued FY 2023)

- Application of Payment Standards
  (Approved FY 2020, implemented FY 2022)

- Exclusion of Guaranteed Income Payments
  (Approved FY 2023, implemented FY 2023)

Description/Update

This activity applies to Public Housing (PH) and Housing Choice Voucher (HCV) residents, including those participating in the PBV program.

- Financial Aid Disregard in Calculation of Total Tenant Payment (TTP) – HCV/PBV Programs
  When calculating an HCV/PBV participant's Total Tenant Payment (which is based on their annual income), LMHA disregards financial aid exceeding amounts received for tuition and fees for all adult full-time students.

- Elimination of the Standard Earned Income Disregard
  LMHA eliminated the HUD Standard Earned Income Disregard from the calculation of total tenant payment for families who are in the Public Housing and HCV/PBV programs.

- Earned Income Disregard for Elderly Families
  LMHA provides a $7,500 earned income disregard to elderly Public Housing and HCV/PBV families whose only other source of income is Social Security, SSI, and/or pension.

- Asset Policy
  Using its MTW authority, LMHA has adopted the following policies regarding asset self-certification, verification, valuation, and income calculation:

  - Self-certification of assets valued up to $50,000. When the market/face value of assets is up to $50,000 LMHA will accept a self-certification of asset value and income.

  - When the market/face value of a family's assets is over $50,000, regulatory HUD verification requirements are followed.

  - Exclusion of income from assets where the asset value is up to $50,000.

  - For assets with market/face value more than $50,000, LMHA will calculate asset income by taking the market/face value and multiplying that value by the established passbook savings rate.

  To better align with regulatory changes described in HUD's Final Rule, "Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103, and 104," which was published in the Federal Register on February 14, 2023, the asset policy's $50,000 threshold will be adjusted annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers.

- Exclusion of Full-Time Student Income (Discontinued in FY 2023)
  Under existing HUD regulations, all but $480 of earned income is excluded for full time students. Using its MTW flexibility, LMHA adopted a policy of excluding *all* full-time student earned income. This income exclusion applied to full-time students other than the head of household, co-head, and spouse. Because this income was fully excluded, LMHA did not require verification. However, LMHA verified qualification for the exclusion.

- Exclusion of Adoption Assistance Payments (Discontinued in FY 2023)
  Under existing HUD regulations, all but $480 of adoption assistance payments is excluded from the calculation of income. Using its MTW flexibility, LMHA adopted a policy of excluding *all* adoption assistance payments. Because this income was fully excluded, LMHA did not require verification. However, LMHA verified qualification for the exclusion.

- Modified Standard Medical Deduction
  In FY 2021, LMHA received approval and implemented a modification to its existing medical deduction threshold for elderly HCV, PBV, and public housing families. These families originally could claim a $1,600 flat deduction without the need for third party verification. LMHA modified the medical deduction and established a new threshold equivalent to the Medicare Part B premium established by the U.S. Centers for Medicare and Medicaid Services. LMHA uses the premium amount corresponding to the year in which the family's re-examination is scheduled to take place.

This change enables LMHA to account for rising medical costs using a known U.S. government figure but also avoids the additional expense and administrative burden of future MTW activity modifications when the deduction threshold needs to be increased. This change also benefits families, as it represents a modest overall increase in the overall value of the deduction before third party verification is required.

- Application of Payment Standards
  Using its MTW flexibility, LMHA will apply the payment standard in effect on the effective date of a household's regular recertification, regardless of any fluctuation in the payment standard from year to year. During an interim recertification, LMHA will apply the payment standard used at the last regular recertification. Where the payment standard in effect at the time of the applicable interim recertification reflects a decrease when compared to the payment standard applied at the last regular recertification, LMHA will not update the payment standard at the interim recertification and will wait until the next regular recertification to update the payment standard.

- Exclusion of Guaranteed Income Payments
  LMHA has adopted a policy of excluding guaranteed income payments of up to $6,000 annually received by Public Housing and HCV/PBV families participating in the YALift! guaranteed income pilot, which is being administered by Louisville Metro Government, Metro United Way, Russell: A Place of Promise, and Mayors for Guaranteed Income. The program provides a monthly payment of $500 over a 12-month period, and seeks to increase economic stability among 18-24 year olds in high poverty neighborhoods. Program partners anticipate that providing such income support will allow the family to fully pursue their educational and career goals, objectives which align well with LMHA's goal to provide incentives to families to obtain employment and become economically self-sufficient.

Planned Non-Significant Changes
There are no planned non-significant changes for FY 2025.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours - decrease	Total time to complete task: 10,827 hours	Total time to complete task: 8,195 hours		

	Number of hours per recertification: 1 Total number of regular recertifications: 10,827	Number of hours per recertification: 1 Total number of regular recertifications: 8,195		
CE #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)	Not Tracked	5%	5%	
SS #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)	PH: 69 HCV: 413	PH: 49 HCV:459		
SS #8: Households Transitioned to Self Sufficiency*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency (increase).	PH: 302 HCV: 1,364	PH: 332 HCV: 2,031		
**Self-Sufficiency is defined as being employed and having earned income equal to or exceeding $14,500.*				

Planned Significant Changes

No significant changes are planned.

Activity #2020-2: Streamlined Flat Rent

Plan Year Approved, Implemented, Amended
Approved and implemented FY 2020.

Description/Update
This activity applies to Public Housing (PH) residents. Using MTW flexibility, LMHA has revised the policy under which flat rents are updated as well as the policy for completing flat rent updates for families on flat rent.

Under existing HUD regulations, flat rents must be set at no less than 80% of the applicable Fair Market Rent (FMR). FMRs must be reviewed annually and flat rents revised as needed; however, if the FMR goes down, flat rents do not have to be adjusted. Additionally, HUD requires that flat rent updates be completed annually for families on flat rent. The annual review of flat rents, public notice process and flat rent update transactions carry an administrative burden. Often, errors result from incorrect application of updated flat rents.

Instead, LMHA will update flat rents every 5 years from the date of the last change; however, if the average FMR for all bedroom sizes increases more than 5% in any given year, LMHA will update the flat rent schedule and complete flat rent updates for families on their respective anniversary dates. In the absence of changes to the flat rent schedule, LMHA will not complete flat rent update transactions for families paying flat rent. Finally, where a flat rent family has a full recertification due, LMHA will apply the flat rent from the schedule in effect at the time of the full recertification.

Planned Non-Significant Changes
LMHA will not increase the family's rent between triennial recertifications.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total Time to complete flat rent updates: 172 hours Time spent on each flat rent update: 1 hour Number of households on flat rent: 172	Total Time to complete assumes no updates needed: 0 hours Time spent on each flat rent update: 1 hour Number of households on flat rent: 86		

CE #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).	Not currently tracked	5%		

Planned Significant Changes

No significant changes are planned.

Activity #2020-3: Local Forms

Plan Year Approved, Implemented
Approved and implemented FY 2020.

Description/Update
This initiative allows LMHA the flexibility to develop local versions of forms, as needed, to streamline processing, utilize "plain language," address MTW policies, and address local housing market features. Forms that LMHA has developed include, but are not limited to, the Project Based Voucher (PBV) Housing Assistance Payment (HAP) contract, the Family Self-Sufficiency (FSS) Contract of Participation and Individual Training and Services Plan, the Project Based HAP Contract, and the Privacy Act Notice. Development of any local form must meet all applicable HUD requirements.

To date, LMHA has developed and implemented the following local forms:

- An FSS Contract of Participation to reflect the program enhancements undertaken under Activity #2020-4.

- An Authorization for Release of Information/Privacy Act Notice (which replaces form HUD-9886). The form extends the expiration date to 36 months to accommodate families on biennial and triennial recertification cycles.

- A Project Based Voucher Housing Assistance Payment (PBV HAP) contract, taking into account the flexibilities provided under LMHA's Local PBV Program (Activity # 2019-1). The PBV Tenancy Addendum and Statement of Family Responsibility were also updated to reflect LMHA MTW policies. As new PBV contracts are executed and families leased, LMHA will use the applicable MTW forms.

- A Request for Tenancy Approval (HUD-52517), which adds a section to be completed by LMHA staff with key information such as the client's tenant id number and the landlord's vendor number.

- A Utility Allowance Schedule (HUD-52667), which includes allowances for six-, seven-, and eight-bedroom units.

LMHA will continue to explore options for additional local form development as time and resources permit. New forms will be rolled out as they are completed.

Planned Non-Significant Changes
The Housing Authority will stop using its local version of the Local Authorization for Release of Information/Privacy Act Notice (which replaces form HUD-9886) upon implementation of HOTMA.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	Total staff time required prior to implementation: 22 hours Contracts executed in FY 2019: 11 Time to prepare HAP contract prior to implementation: 2 hours	Total staff time required after implementation: 3 hours Expected HAP contracts executed in FY 2025: 3 Time to prepare contract after implementation: 1 hour		
**The baseline reflects the 11 conditional PBV contract commitments which were reflected in the FY 20 report, which is the first report where PBV commitments were reported by LMHA.* ***Benchmark reflects the number of new PBV contracts anticipated in FY 2024*				

Planned Significant Changes

No significant changes are planned.

Activity #2020-4: FSS Program Enhancements

Plan Year Approved, Implemented, Amended
Approved and implemented FY 2020; amended FY 2021.

Description/Update
This activity applies to Housing Choice Voucher (HCV) and Public Housing (PH) Family Self Sufficiency (FSS) program participants. Using MTW flexibility, LMHA has developed FSS program enhancements which are designed to both improve the participant retention rate as well as to increase participants' long-term economic capacity by providing incentives to complete education and training programs before entering the workforce. LMHA will also use MTW funds to provide support services aimed at empowering families to build savings and financial capabilities as a pathway out of poverty. Enhancements to LMHA's FSS program include:

- Modification of the requirement that an FSS applicant must have an interim or annual recertification within 120 days prior to FSS enrollment. LMHA will use the last completed certification prior to the effective date of the Contract of Participation (CoP).

- Opportunity to obtain escrow funds for clients who would otherwise be ineligible for the escrow component of FSS due to their level of income. LMHA has modified the escrow calculation methodology by calculating FSS credits using the same method for all participants regardless of income level. The method used for very low-income households will apply to all participants.

- Placement of an absolute cap on the amount of escrow regardless of prior FSS participation. The cap, which may be periodically reviewed and updated at LMHA's discretion, is currently set at $25,000 per household. Generally, incentive payments count toward the $25,000 escrow cap.

- Establishment of goal-specific incentive payments when a family attains an established goal. LMHA reserves the right to disburse incentive payments upon final escrow disbursement or at the time of goal completion. Incentives may include, but are not limited to:

    - $50 for attendance at three FSS meetings within the first four months of enrollment in FSS;
    - $50 for attending a workshop related to a goal (limit of 6 workshop incentives);
    - $100 for attending 12 consecutive months of case management meetings;
    - $150 for completion of a GED or receipt of a high school diploma;
    - $250 for an Associates Degrees (one-time limit per person); and,
    - $500 for completion of a bachelor's or master's degree (one-time limit per person).

- LMHA provides an additional incentive payment to graduating families who have not experienced a significant increase in earnings during their participation in the FSS program but have met all program requirements and completed their Contract of Participation (COP). Specifically, if a family has less than $500 accrued in their escrow at the time of graduation, LMHA provides an additional payment to supplement the family's total escrow savings, so that the family receives at least $500 upon graduation. For example, if a graduating family has

$250 in escrow, LMHA provides an incentive payment of $250 to the family at graduation. If the graduating family has accrued $500 or more in escrow, LMHA does not supplement their escrow through this incentive payment.

- Use of FSS escrow forfeitures to fund goal-specific incentive payments disbursed to families who achieve the established interim goals. LMHA will continue to comply with the regulatory requirements for monthly reporting of FSS escrow forfeitures on Form HUD-52681-B.

- Establishment of an incentive payment for FSS graduates who purchase a home within two years of completion of the FSS program. The incentive payment amount, which may be periodically reviewed and updated at LMHA's discretion, will be set at $2,000 per household. To qualify for the homebuyer purchase bonus, the FSS homebuyer must complete an approved Homebuyer Education course. The $2,000 bonus may be used for a down payment or for post-purchase expenses. LMHA may allow this bonus to be in addition to the $25,000 escrow cap.

- Opportunity for adults, other than the head of household, to fulfill work requirements. LMHA modified this requirement such that the head of household (or co-head) will still execute the CoP, but at that time they may designate any adult household member (age 18 or over) to fulfill the ITSP requirements and allow the family to collect escrow. This change provides families with working age adults greater opportunity to benefit from the program and achieve greater levels of self-sufficiency, particularly if the head of household has other responsibilities such as ongoing childcare. Please note that the family can only change their designated responsible household member either with prior LMHA approval, or in certain extenuating circumstances (death, move out, etc.).

- Flexibility to provide participating families an additional period of up to six months to complete ITSP goals before the contract terminates, after 30% of their monthly adjusted income equals or exceeds the existing Fair Market Rent (FMR). This extended time period reduces the disincentives to increased earnings that could result from this regulation, and allows families – who have often used the FSS program to substantially increase their earnings – to more fully benefit from their hard work and accumulate increased escrow that will enhance their long-term prospects for self-sufficiency and ability to meet long-term goals such as homeownership. Additionally, this change also incentivizes additional families to participate and remain in the program.

- Modification of FSS CoP for youth participating in the HUD Family Unification Program (FUP) Foster Care Alumni initiative. These youth receive a voucher for a limited three-year period, and LMHA is committed helping them attain self-sufficiency. The modified CoP revises existing requirements in order to reflect the needs of this population as well as the parameters of the FUP program participation limits. The CoP includes the following terms and requirements:

    - A shortened contract term of three years;
    - Participants must be suitably employed, as stated in LMHA's FSS Action Plan, for at least six consecutive months;
    - Participants must be not receiving TANF assistance for at least six months (reduced from the normal 12-month requirement); and

- Participants must attend at least three professional skills workshops in addition to completing financial skills training.

LMHA will review the impact of the financial incentives and may modify, add, or remove incentives to support the goals of the program and/or to address financial constraints during the fiscal year.

As was noted in the Housing Authority's FY 2022 MTW Annual Report, LMHA developed policy changes related to the Individual Training and Services Plan (ITSP), which have been incorporated in the FSS Action Plan approved by HUD on November 16, 2022. Specifically, LMHA includes the following in the ITSP:

- Definition and requirement for minimum suitable income, with exceptions for disabilities
- Guidance on how income will be calculated for self-employed participants
- Definition of "maintaining employment"
- Definition and minimum requirement for participation in case management
- Requirement to complete financial skills training
- Requirement to establish checking and savings accounts

LMHA has also eliminated the ITSP requirement to complete six (6) additional workshops related to ITSP goals. In lieu of this requirement, LMHA now offers an incentive of $50 escrow payment for each workshop completed (up to six (6) workshops related to ITSP goals).

Planned Non-Significant Changes
LMHA has no planned non-significant changes for FY 2025.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

SS #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).	PH: $17,346 HCV: $19,429	PH: $22,475 HCV: $26,486		
**Average earned income is calculated for households with earned income.*				
SS #2: Increase in Household Savings*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average amount of savings/escrow of households affected by this policy (increase).	PH: $2,452 HCV: $2,873	PH: $3,998 HCV: $1,000		
**Average amount of savings/escrow for households with savings/escrow.*				
SS #3: Increase in Positive Outcomes in Employment Status				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed full-time or part-time	PH: No. Employed: 51 % Employed: 63% HCV: No. Employed: 87 % Employed: 67%	PH: No. Employed: 24 % Employed: 73% HCV: No. Employed: 104 %: Employed: 56%		
Unemployed*	PH: No. Unemployed: 30 % Unemployed: 37% HCV: No. Unemployed: 43 % Unemployed: 33%	PH: No. Unemployed:8 % Unemployed: 27% HCV: No. Unemployed: 81 % Unemployed: 44%		
Enrolled in Education	PH: 4 HCV: 14	PH: 0 HCV: 9		
Enrolled in Job Training	PH: 1 HCV: 1	PH: 0 HCV: 0		
** Includes only non-elderly and non-disabled families*				
SS #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).	PH: 0 HCV: 6	PH: No.: 0 households % of households: 0% HCV: No.: 8 households % of households: 4%		
SS #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).	330	305		
**Includes graduates as well as families who received services and who did not successfully complete the FSS program.*				
SS #8: Households Transitioned to Self-Sufficiency*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**

Number of households transitioned to self-sufficiency (increase).	PH: 15 HCV: 31	27 (PH and HCV)		
**LMHA defines self-sufficiency as graduation from the FSS program.*				

Planned Significant Changes

No significant changes are planned.

Activity #2020-5: Gap Financing

Plan Year Approved, Implemented, Amended

Approved FY 2020, Implementation Planned FY 2025.

Description/Update

The activity involves the use of MTW flexibility to develop and implement a Gap Financing Program (GFP) for developers using Project-Based Vouchers (PBV) to create or preserve affordable housing. The GFP provides LMHA the flexibility to grant capital awards and/or loans to developers who have been awarded PBVs and need additional project funding for development or preservation of affordable housing. Applicants will be required to demonstrate experience in affordable housing development and meet other LMHA eligibility requirements, including but not limited to demonstrating proof of sufficient collateral to cover a default in the loan, demonstrating an acceptable payment history of previous financing, and meeting minimum credit score requirements as defined in LMHA's underwriting criteria. All awarded developers will be required to pay prevailing wages and meet minority/women/disadvantaged business enterprise participation goals (M/W/DBE), where applicable.

Overall, LMHA expects that the GFP will make it more financially feasible for developers, awarded PBVs, to develop and/or preserve affordable housing.

The GFP will be offered in the form of loans with maximum interest rates not to exceed 3%, amortization periods not to exceed 40 years and loans not to exceed $1M per project, subject to all required approvals. LMHA will not loan more than $5M per year.

LMHA may use this financing tool in FY 2025 or in future fiscal years to support a pipeline of ongoing redevelopment efforts using PBV assistance in both existing housing and new construction settings.

Planned Non-Significant Changes

No non-significant changes are planned.

Planned Changes to Metrics/Data Collection

No changes to metrics/data collection are planned.

Metrics

HC #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 because of the activity (increase)	PBV: 100	PBV: 100		
HC #2: Units of Housing Preserved				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in the box	PBV: 100	PBV: 100		
HC #3: Decrease in Wait List Time				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Average applicant time on the wait list in months (decrease)	6 mos.	6 mos.		
HC #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.	0	0		
HC #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 because of the activity (increase).	PBV: 200	PBV: 200		

Planned Significant Changes

No significant changes are planned.

Activity #2021-1: Preservation of Low-Income Homeownership Units

Plan Year Approved, Implemented, Amended

Approved FY 2021, Implemented FY 2021.

Description/Update
Utilizing the MTW local, non-traditional activity for homeownership assistance, LMHA will provide limited financial assistance to existing cost-burdened, low-income homeowners who are at risk of foreclosure and/or displacement. These low-income homeowners reside in Louisville neighborhoods undergoing significant revitalization as a result of Opportunity Zone and other major federal, state and/or local investments such as Choice Neighborhoods and HOPE VI.

As a result of recent and planned significant investments and emerging gentrification trends in and around Opportunity Zone neighborhoods, LMHA anticipates that home values will rise substantially in those areas in the coming years. Ensuring that cost-burdened, long-term low-income homeowners are able to maintain their homes through this evolving process and, ultimately, to build household equity resulting from increased real estate market valuations is a priority of LMHA and is consistent with its goal to ensure the equitable distribution to long-term community residents of benefits that accrue from major public and private investment initiatives.

An example is the Russell neighborhood, for which LMHA has developed a Choice Neighborhoods Transformation Plan and secured $35 million in HUD CNI grants. Called Vision Russell, the Transformation Plan initiative's boundaries fall within an Opportunity Zone and span from Market Street to Broadway, and from 9th to 32nd Streets. The CNI grant and leveraged funds secured by LMHA will fund replacement of the Beecher Terrace housing complex and critical community improvements in the Russell neighborhood. One of the key goals of Vision Russell is to increase the availability of high-quality, affordable mixed-income housing including both rental and homeownership units.

In addition to the distressed Beecher Terrace site, the Russell neighborhood is home to an estimated 650 low-income homeowners, many of whom are housing cost-burdened and struggling to meet the rising cost of mortgage loans, utilities, repairs, and other homeownership costs. They are at risk of foreclosure and/or displacement. Consistent with the broader mixed-income housing goal, providing financial assistance to these homeowners is a goal of LMHA and its Vision Russell partners. This will help ensure that long-term residents can remain in the neighborhood and take advantage of the numerous community improvements that are underway or planned over the next several years.

Similar dynamics and demographics are found in other focus neighborhoods such as Park DuValle, Liberty Green and Sheppard Square, all of which are within Opportunity Zones where major HOPE VI initiatives have occurred. Likewise, LMHA is investing in the area surrounding the former Iroquois Homes public housing development where the first phase of redevelopment is scheduled to begin Summer 2025.

Through this local, non-traditional MTW activity, LMHA will provide homeownership assistance to households that meet the following criteria:

- Meet HUD's definition of low-income;
- Currently own a home within a neighborhood undergoing significant revitalization as a result of Opportunity Zone and other major federal, state and/or local investments such as Choice Neighborhoods and HOPE VI. To avoid rewarding speculators, the home must have been purchased prior to the designation of the neighborhood for significant revitalization investments. For example, in the Russell neighborhood, the home must have been purchased by the household prior to the submission date for the Vision Russell CNI Implementation Grant proposal; and,
- Are cost-burdened, i.e. total homeownership costs exceed 30% of adjusted gross household income.

All units will be inspected by LMHA and must comply with Housing Quality Standards (HQS). Low-income homeowners served under this activity may be significantly cost-burdened and may require financial assistance to complete home repairs needed to fully comply with HQS. To limit the risk of unsafe conditions and eventual foreclosure, LMHA will structure this activity to include forgivable loans up to $25,000 to cover the cost of the repairs necessary to bring the home into compliance with HQS. The forgivable loans are in addition to providing homeownership assistance payments once the home passes HQS inspection and the family has entered into a contract with LMHA.

LMHA will conduct intake screening, including inspecting the home to determine the actions needed to bring the home into compliance with HQS. To ensure that homeowners can remain in their residences, payment standards will be set for the bedroom size of the residence. Subsequent to the intake inspection, LMHA will work with homeowners to assist them with identifying resources to complete the repair work and to complete an estimate of repair costs and schedule of repairs. Upon LMHA approval of the repair estimate and schedule, LMHA will enter into a forgivable loan agreement with the homeowner, including default and lien provisions. Funds will be disbursed upon receipt of invoices from contractors/suppliers. The amount of the loan may be anywhere from $250 up to a maximum of $25,000 with the requirement that repairs be completed based on the LMHA approved estimate and schedule. The loan term will be based on forgiveness of up to $2,500 per year. For example, a $2,500 loan would be forgiven one year after the contract is signed. Loans of $2,501 to $5,000 will have $2,500 forgiven in year one and the remaining balance forgiven in year two. Once the repairs are completed and the home passes HQS, LMHA will enter into a contract with the homeowner and LMHA will commence providing homeownership assistance payments for a term consistent with HCV homeownership program guidelines. If repairs are not completed on a timely basis and/or if the homeowner does not comply with program requirements, LMHA will terminate assistance and enforce the provisions of the loan agreement.

LMHA has partnered with the Louisville Metro Government's Home Repair program to assist homeowners in identifying qualified contractors to complete repairs required to comply with HQS and begin receiving homeownership assistance. The Home Repair program maintains a pool of qualified contractors who will submit bids for the homeowner's requested repair(s).

While this is an MTW local, non-traditional activity, household eligibility will be based on the same income, wage, and asset thresholds as those included in the HCV Homeownership program. The subsidy for the households to be served under this will also be calculated consistent with the methodologies used in the HCV Homeownership program including term limits on the subsidy while ensuring that the family remains in their home.

LMHA will also require participants to meet the Principal Residency and Financial Capacity requirements applicable to local, non-traditional MTW homeownership activities as further described in PIH Notice 2011-45.

Planned Non-Significant Changes
LMHA wishes to clarify that the utility allowance will be set based on the bedroom size of the home.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

HC #2: Units of Housing Preserved				
Unit of Measurement	**Baseline**	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Housing units preserved prior to implementation: 0	Expected housing units preserved after implementation of the activity: 20		
**Represents households served in FY 2024 and not the total served during the lifetime of this activity.*				
HC #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).	Households losing assistance/moving prior to implementation of the activity: 21	Expected households losing assistance/moving after implementation of the activity: 0		

Planned Significant Changes
No significant changes are planned.

Activity #2021-2: Emergency Waivers

Plan Year Approved, Implemented, Amended

Approved FY 2021, Implemented FY 2021.

Description/Update

As demonstrated by the COVID-19 pandemic, public health and other government-declared emergencies can disparately impact low-income families and place additional burdens on housing authorities as they work tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements.

Accordingly, LMHA has developed a set of emergency waivers to address the burdens placed on all stakeholders, which the Authority can implement in response to emergencies as declared by the applicable unit of government with jurisdiction over LMHA, including the authority to determine when to place and lift the waivers. LMHA may revise, add and/or remove waivers as needed to address the specific conditions associated with a given emergency (economic, health-related, a natural disaster, etc.). In addition to agency-specific waivers implemented through this activity, LMHA retains the right to avail itself of additional waivers, regulatory or statutory relief, or any other emergency-related provisions that may be made available by HUD or other governmental entities.

1. **Administrative Plan and Admissions and Continued Occupancy Policies:** LMHA will waive the requirement to obtain Board approval prior to adopting new and/or revised policies. LMHA will obtain formal Board approval within three months of the end of the declared emergency.

2. **Briefing:** LMHA will waive the requirement to conduct an oral briefing for voucher families and, as an alternative, will conduct the briefing by other means such as a webcast, video call, or expanded information packet. LMHA will ensure that the method of communication for the briefing ensures meaningful access for all invited attendees. This waiver applies to the HCV and PBV programs.

3. **Delayed Reexaminations:** LMHA will waive the requirement to conduct a reexamination of family income and composition at least annually. Currently, LMHA completes reexaminations on a biennial basis for the majority of Public Housing (PH) households with those paying $0 rent on an annual schedule and those on flat rents or with fixed incomes on a triennial cycle. Where reexaminations have been delayed, LMHA will complete the reexamination no later than the anniversary month of the following year. The next reexamination will be scheduled on the same anniversary month using the applicable reexam frequency for the family. For example, if a biennial reexam was due on July 2020, LMHA would complete the reexam by July 2021. The next scheduled biennial reexam would take place in July 2023. This waiver applies to the PH, HCV and PBV programs.

4. **Increase in Payment Standard:** LMHA will waive the requirement to apply the increased payment standard back to the regular effective date for delayed regular reexaminations. Instead, during periods of declared emergencies, LMHA will apply the increased payment standard at the next interim reexamination (where applicable) after the effective date of the increased payment standard. If LMHA completes a reexam late, LMHA will apply the payment standard in effect on the effective date of the delayed regular reexamination. This waiver applies to the HCV program.

5. **Verification of Income:** During periods of declared emergencies, LMHA will waive the requirements of the verification hierarchy, but continue to use EIV.

6. **Delayed Regular HQS Inspections:** LMHA will waive the requirement for completion of regular HQS inspections at least biennially. Where a regular HQS inspection has been delayed, LMHA will complete the HQS inspection no later than the anniversary month of the following year. The next HQS inspection will be scheduled on the same anniversary month using the applicable inspection frequency for the unit. For example, if an HQS inspection was due on July 2020, LMHA would complete the inspection by July 2021. The next scheduled annual HQS inspection would take place in July 2022. LMHA will continue to request a self-certification from the owner that no life-threatening conditions exist in the unit. Additionally, LMHA will continue to conduct complaint inspections. This waiver applies to the HCV and PBV programs.

7. **Interim HQS Inspections:** LMHA will waive the requirement to conduct re-inspections to confirm repair; however, LMHA will require that the owner self-certify and provide documentation that a life-threatening deficiency has been corrected within 24 hours of notification or LMHA will conduct a remote video conference within 24 hours to confirm repair. LMHA will accept an owner self-certification that non-life-threatening deficiencies have been corrected within 30 days of LMHA notification. This waiver applies to the HCV and PBV programs.

8. **HQS QC Inspections:** LMHA will waive the requirement to conduct HQS quality control inspections and instead will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV and PBV programs.

9. **Homeownership HQS:** LMHA will waive the requirement for the initial HQS inspection for homeownership units; however, an independent inspection performed by an American Society of Home Inspectors (ASHI) certified professional will still be required. This waiver applies to the HCV Homeownership Program.

10. **Delayed PH Annual Self-Inspection:** LMHA will waive the requirement to complete annual self-inspections of PH units. LMHA will continue to respond to and address serious conditions that could jeopardize life or property. When the waiver is lifted, LMHA will resume self-inspections beginning with the units which were inspected on the oldest date. This waiver applies to the PH program.

11. **FSS Contract of Participation:** LMHA will waive the requirement regarding the maximum extension of an FSS Contract of Participation (COP). During periods of declared emergency, LMHA may extend a family's COP, using the declared emergency as good cause of the need for extension. For households who were already in the two-year extension period when the emergency was declared, LMHA may extend their COP beyond the two-year extension threshold. This waiver applies to LMHA's MTW FSS program.

12. **Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units:** LMHA is waiving the HQS inspection requirement and establishing an alternative requirement. Instead of conducting the pre-HAP contract HQS inspection, LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question. LMHA will require the owner's certification. However, LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. LMHA will conduct an HQS inspection no later than the 1-year anniversary date of the owner's certification.

    When and if LMHA has imposed an additional requirement under the AHAP for newly constructed or rehabilitated projects, LMHA may choose to allow the owner to certify that the LMHA requirement has been met instead of inspecting the housing to make that determination. This waiver and alternative requirement may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection. LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question.

13. **PBV Turnover Unit Inspections:** LMHA is waiving the regulatory requirement to inspect PBV contract units at turnover and providing as an alternative requirement that LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question to allow a new family to occupy the vacated PBV unit. LMHA will require this owner certification. However, the LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. LMHA will conduct the HQS inspection on the unit no later than the 1-year anniversary date of the owner's certification. This waiver may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection.

14. **PBV HAP Contract: HQS Inspections to Add or Substitute Units**: LMHA may amend a HAP contract to add additional PBV contract units or substitute a different unit for a previously covered contract unit. The PBV requirements include inspecting the proposed substitute or additional unit to determine that the unit meets HQS before it may be added to the HAP contract. LMHA is waiving the HQS inspection requirement. In order to substitute or add a new unit to the PBV HAP contract, LMHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question instead of conducting an initial inspection. LMHA will require the owner's certification. LMHA may add other requirements or conditions in addition to the owner's certification but is not required to do so. This waiver

may also be applied to LMHA-owned units if the independent entity is unable to perform the inspection.

15. **Mandatory Removal of a Unit from the PBV HAP Contract:** Under the PBV program, LMHA is required to remove a unit from a PBV HAP contract after 180 days of zero housing assistance payments to the unit owner on behalf of the family residing in the unit. This situation arises when the family increases its income to such an extent that it no longer requires housing assistance. LMHA is waiving this requirement and as an alternative requirement, LMHA may keep such units under contract for a period of time that exceeds 180 days but does not extend beyond the end of the LMHA emergency waiver period. LMHA may resume housing assistance payments on behalf of a family residing in such a unit should the family's income change at any point during the period of time covered by the emergency waiver and related extension.

Given the expiration of the federal public health emergency related to COVID-19 in May 2023, LMHA does not plan use the emergency waivers cited above during FY 2025. However, LMHA reserves the right to implement the waivers and alternative requirements authorized under in this activity in FY 2025 and future fiscal years should an emergency be declared.

Planned Non-Significant Changes
No non-significant changes are planned.

Planned Changes to Metrics/Data Collection
No changes are planned to metrics or data collection.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline***	**Benchmark***	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease).	6,399	0 (assumes no waivers are used during FY 2025)		
**The baseline reflects the time expended on all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the time expended for one half the number of PH and HCV regular reexaminations in a one-year period.*				

Planned Significant Changes
There are no planned significant changes.

Activity #2022-1: MTW Utility Allowances

Plan Year Approved, Implemented, Amended
Approved FY 2021, Implemented FY 2021.

Activity Description
Using its MTW authority, LMHA has eliminated the requirement to bill Public Housing families for utility consumption in excess of the established utility allowance. Prior to implementation of this change, LMHA was required to monitor individual check-meters and bill families whose consumption exceeded the allowance. Eliminating the requirement has allowed LMHA to re-allocate limited resources to core property management functions.

Planned Non-Significant Change
There are no non-significant changes planned.

Planned Changes to Metrics/Data Collection
There are no planned changes to metrics or data collection.

Metrics

CE #2: Staff Time Savings				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Total time to complete the task in staff hours (decrease)*	Total time to complete task: 2,064 hours Number of hours to (complete task): 0.636 Total number of (tasks to complete): 3,244	Total time to complete task: 0 hours Number of hours to (complete task): 0 Total number of (tasks to complete): 0		
** Accounts for time savings realized by eliminating billing for excess utility consumption in Public Housing.*				

Planned Significant Changes
There are no significant changes planned.

Activity #2023-1: Special Referral MTW Public Housing Program

Plan Year Approved, Implemented, Amended
Approved FY 2023, Implemented FY 2023

Description/Update
Using MTW flexibility, LMHA has developed a Public Housing special referral program to encourage families to pursue their educational goals and increase their earnings over the long-term. LMHA provides housing to families eligible for the Public Housing program, while the partnering organization provides supportive services. Taken together, the special referral program provides the needed stability and support for families on their path to self-sufficiency.

Families are referred by partner organizations, and applicants receive an admissions preference for the Public Housing program. Families are screened and determined eligible according to requirements outlined in LMHA's ACOP. LMHA (or the property manager) verifies income and calculates rent for participating families according to standard HUD policies.

Accordingly, LMHA has partnered with the Family Scholar House to provide Public Housing to parents while they work to obtain a college degree. To be eligible for this special referral program, 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 or an apprenticeship program as a full-time student. Family Scholar House Public Housing units provide temporary housing to families actively participating in the Scholar House's programming. To receive housing assistance, the head of household must maintain full-time enrollment at a local college, university, or apprenticeship program. Additionally, the head of household must regularly comply with Scholar House program requirements.

Eligibility for the Family Scholar House program is limited to families with children that include either one adult family member or an adult couple. Families interested in applying for a Family Scholar House unit contact the Family Scholar House directly (www.familyscholarhouse.org). Both applicants and current Public Housing residents may apply to this partnership housing and services program; please note however that Public Housing residents have access to the supportive services portion of Family Scholar House's program if they reside in Public Housing units outside of this partnership program. Applicants are selected from a site-based waiting list by the date and time of their application. In addition to LMHA's eligibility criteria, participating families are also subject to Family Scholar House policies, outlined in the Participation Agreement. Failure to comply with policies set forth in the Participation Agreement will result in termination from the program.

Housing assistance is provided during the term of family's participation in Scholar House. Families must relinquish their unit when they graduate from or otherwise terminate their participation in the Scholar House's programming. Participants who successfully graduate from the program receive a preference for admission to LMHA's Housing Choice Voucher Program as long as the participant was living in LMHA public housing (including PH/LIHTC housing) at the time of successful program completion. LMHA places graduating families on the waiting list based on their preference and the date and time of application, according to the waiting list and selection policies described in the Admin Plan.

Planned Non-Significant Changes
There are no planned non-significant changes.

Planned Changes to Metrics/Data Collection
There are no planned changes to metrics/data collection.

Metrics

SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Enrolled in an Educational Program	0	11 households		
SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
# of HHs receiving services aimed to increase self-sufficiency (increase).	0	11 households		
* *All households assisted through this activity will receive supportive services from the Family Scholar House.*				
SS #8: Households Transitioned to Self-Sufficiency*				
Unit of Measurement	**Baseline**	**Benchmark**	**Outcome**	**Benchmark Achieved?**
Number of households transitioned to self-sufficiency (increase).	0	2 households		
**Self-Sufficiency is defined as households who obtain their college degree and graduate from the Scholar House program.*				
HC #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 because of the activity (increase).	0	11		

B. MTW Activities Not Yet Implemented

Activity #2011-2: Locally Defined Guidelines for Development, Maintenance and Modernization of Public Housing

(Formerly Activity #28-2011)

Description/Update

This activity was proposed and approved in FY 2011. It has not yet been implemented.

The activity is to explore, using MTW authority, the creation of locally defined guidelines for the re/development, maintenance, and modernization of public housing. LMHA plans to develop reasonable and modest design guidelines, unit size guidelines, and unit amenity guidelines for new and ongoing public housing development activities. The criteria will 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 that increase the supply of accessible housing in the community.

Timeline for Implementation

Planning for this activity will be ongoing during FY 2025 as the Authority continues planning for the repositioning of its legacy Public Housing assets. Any locally defined guidelines resulting from this process would be officially proposed to HUD as an amendment to this Plan.

Explanation of Non-Significant Changes Since Approval

There have been no non-significant changes or modifications to this activity since its approval.

C. MTW Activities on Hold

Not applicable.

D. Closed-Out MTW Activities

The following table summarizes previously approved MTW activities that LMHA has completed, discontinued, or determined do not require MTW authority to implement.

Table 12: Closed-Out MTW Activities

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
MTW Unit Inspection Protocol (Activity #2-1999)	FY 1999	FY 2018	LMHA used MTW authority to allow the certificate of occupancy to suffice for the initial move-in inspection in lieu of a traditional HQS inspection. Unit inspections of facilities that participate in HUD's Housing Choice Moderate Rehabilitation Program and that are managed by organizations with which the Agency has had a long-term and outstanding relationship, are waived upon initial occupancy and the agency has the authority to conduct inspections once per year concurrently. This activity was closed out since there are no longer any new Mod-Rehab units coming online and as such, MTW flexibility is no longer needed to allow the certificate of occupancy to suffice for initial move-ins in lieu of a traditional HQS inspection.
Spatial Deconstruction of HCV Assisted Units (Activity #5-2007)	FY 2007	FY 2009	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 discontinued because of its potential to limit voucher holders' universe of housing choices.
Public Housing - Term Limits and Employment/Education Requirements for New Scattered Sites (Activity #9-2007)	FY 2007	FY 2016 FY 2017	This activity revised the occupancy criteria for detached, single family, scattered site units to include 5-year residency term limits and employment/education requirements for admission and ongoing occupancy. In 2014, LMHA implemented an admissions preference for qualified three-bedroom eligible families; however, the new preference did not lead to substantial improvement in occupancy levels. Due to continued low occupancy rates at these sites, the activity was revised in FY 2016 to remove the 5-year residency term limit and in FY 2017, LMHA stopped enforcing the employment/education requirements associated with these units and closed out this activity, allowing LMHA to increase occupancy rates.
Explore HUD's Streamlined Demolition and Disposition Application Process for MTW Agencies (Activity #16-2009)	FY 2009	FY 2014	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.
Occupancy Criteria Changes for New Scattered Sites –	FY 2010	FY 2016	This activity revised the occupancy criteria for detached, single-family scattered site units to include mandatory participation in a case management program and

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
Mandatory Case Management (Activity #21-2010)			movement toward self-sufficiency. Residents moving into one of these units could choose between General Case Management and the Family Self-Sufficiency (FSS) Program. Due to low occupancy rates at these sites, this activity was closed out in early FY 2016.
Increased Flat Rents (Activity #24-2010)	FY 2010	FY 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 were completed. LMHA decided not to implement this activity and flat rents have since been raised across all the agency's public housing units to meet HUD's recent requirement that PHAs set flat rents to at least 80% of FMR.
Rents Set at 30% of Adjusted Income – Public Housing Program (Activity #33-2012)	FY 2012	FY 2014	LMHA proposed that families receiving rental assistance under the Public Housing program would pay either 30% of their monthly adjusted income for rent, or the minimum rent established by the LMHA, whichever was higher. Upon further consideration, because the Housing Authority's housing stock includes tax credit units, LMHA considered amending the activity to include "ceiling rents" that would vary by bedroom size and that would be set 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. However, this significant change was never submitted to HUD. Rather, in 2014, LMHA raised flat rents to conform to new HUD regulations mandating that PHAs set flat rents to at least 80% of FMR.
HCV Program – HUD/MDRC Rent Reform Demonstration	FY 2015	FY 2022	LMHA participated in a HUD-commissioned six-year study which evaluated an alternative HCV rent reform policy. By FY 2022, all participants had been transitioned back to standard MTW rent and recertification policies.
MTW Special Referral Program – Coalition for the Homeless "Move Up" Initiative (Activity #45-2016)	FY 2016	FY 2018	The "Move Up" Special Referral Program in partnership with the Coalition for the Homeless allocates up to 100 vouchers to formerly homeless families, allowing them to transition from homeless services vouchers to HCV vouchers, thus freeing up additional homeless services vouchers to serve currently homeless families. This activity was closed out, since the Housing Authority, with MTW Office concurrence, determined that this partnership can be continued without MTW authority through the provision of a "limited admission preference" to the Agency's HCV Program.
Public Housing Sub-lease Agreement with Catholic Charities (Activity #2010-1, formerly Activity #25-2010)	FY 2010	FY 2021	The Public Housing Sub-lease Agreement with Catholic Charities activity allowed LMHA to establish a sub-lease agreement with Catholic Charities to provide emergency housing for victims of human trafficking. This activity was closed out as a result of a HUD OGC investigation of the use of public housing as emergency housing for victims of human trafficking which found that it was not feasible

Activity	Plan Year Approved and Implemented	Close Out Year	Reason for Close Out
			under MTW to permit families who could not produce valid identification to live in public housing communities.
Eviction Prevention – COVID-19 Relief (Activity #2021-3)	FY 2021	FY 2023	$2 million were set aside for disbursement to cover rental arrears for low-income households as a means to reduce evictions during the COVID-19 pandemic. The activity was closed out once all funds were expended.

V. Planned Application of MTW Funds

A. Planned Application of MTW Funds

Tables 13 and 14 below provide estimated sources and uses of MTW funds for FY 2025. As LMHA's funding levels for future periods are unknown at the present time, this table provides preliminary projections. Actual sources and uses are expected to vary based on the level of funding provided to LMHA and the level of actual expenses. LMHA's estimated Sources and Uses budget for FY 2025 assumes continued reductions in Public Housing Operating Subsidy, Capital Fund Program, HCV, and HCV Administrative fees. The tables follow HUD's required formats and do not include information on non-MTW funding sources and uses.

i. Estimated Sources of MTW Funds

Table 13: Estimated Sources of MTW Funding for FY 2025

FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	$9,270,258
70600	HUD PHA Operating Grants	$161,204,385
70610	Capital Grants	$96,264
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$236,392
71100+72000	Interest Income	$475,481
71600	Gain or Loss on Sale of Capital Assets	$0
71200+71300+71310+71400+71500	Other Income	$1,662,634
70000	**Total Revenue**	**$172,945,413**

ii. Estimated Application of MTW Funds

Table 14: Estimated Application of MTW Funding for FY 2024

FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+ 91800+91900)	Total Operating – Administrative	$21,657,100
91300+91310+92000	Management Fee Expense	$464,501
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	$3,055,490

FDS Line Item	FDS Line Item Name	Dollar Amount
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$9,777,374
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$21,085,043
95000 (95100+95200+95300+95500)	Total Protective Services	$2,307,175
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$1,378,007
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$4,552,559
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	$0
97100+97200	Total Extraordinary Maintenance	$8,022,984
97300+97350	Housing Assistance Payments + HAP Portability-In	$103,364,150
97400	Depreciation Expense	$4,708,980
97500+97600+97700+97800	All Other Expenses	$0
90000		**$180,373,364**

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses: Revenue expected at a lower level than total expense because of expected HAP expense increases in the HCV Program along with higher maintenance expenses due to aging property assets and deferred maintenance issues.

ii. Description of Planned Application of MTW Funding Flexibility

Under the MTW Program, LMHA is authorized to establish an MTW Block Grant budget. Activities that utilize Block Grant single fund flexibility are summarized below:

- Approximately $15,198,000 in surplus funds is budgeted for transfer from the Housing Choice Voucher Program to the Public Housing Program. This will occur to fund the anticipated operating fund subsidy shortfall in the Public Housing Program for Fiscal Years 2024 and 2025, and 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 operational services at the level deemed necessary by LMHA combined with the Public Housing subsidy proration estimated at 92% of eligibility.
- Approximately $13,904,000 in surplus funds is budgeted for transfer from the Section 8 Voucher Program to the Central Office Cost Center. COCC revenues have declined in recent years with the reduction in Public Housing units associated with LMHA's participation in multiple HOPE VI Programs and the CHOICE Program. Although the current fee structure funds basic property management functions that would occur at a traditional Public Housing Agency, it is not sufficient to pay for all of the costs associated

with MTW activities and the complex tasks and personnel necessary to put together development and financing packages for mixed-finance projects, such as CHOICE Neighborhoods.

- Although LMHA has traditionally made transfers to the Public Housing Program from both the Capital Fund Program (CFP) Program and the Housing Choice Voucher (HCV) Program in past years, the proposed budget years' transfer is made entirely from the HCV Program. However, LMHA wishes to retain the authority and flexibility to transfer CFP funds as necessary under current MTW regulations.

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

- Development of the Iroquois Senior Living Community (approx. $9,000,000) from LMHA's HUD-Held MTW Section 8 reserves

- To supplement on-site development at Beecher Terrace associated with the CHOICE grant (approx. $11,224,000) from LMHA's HUD-Held MTW Section 8 reserves

- To supplement the CHOICE grant for recreational amenities on and near the Beecher Terrace site (approximately $6,360,000 from LMHA's HUD-Held MTW Section 8 reserves to make improvements on the former Porter Paints site and the Baxter Community Center). LMHA plans to utilize MTW funding to renovate and expand the Baxter Community Center, located on-site at Beecher Terrace, and to develop a park, which, according to current plans, will feature a pavilion, plaza, spraygrounds, playing field, tennis and basketball courts, playground and other amenities, on the LMHA-owned parcel located across from Beecher Terrace at 13th St. and Muhammad Ali Blvd. Park features, including the community center and park, will be operated and maintained by Metro Parks, and serve Beecher Terrace PBV and other low-income families..

- To provide forgivable loans associated with the local, nontraditional Homeownership Preservation Program (approx. $2,472,000) from LMHA's HUD-Held MTW Section 8 reserves

- To complete deferred maintenance, provide supportive services, and/or complete a needs assessment and planning process at Dosker Manor ($4,000,000) and Avenue Plaza ($3,000,000) from LMHA's HUD-Held MTW Section 8 reserves

- Acquisition and development of low-income and/or mixed-finance housing ($12,598,000) from LMHA's HUD-Held MTW Section 8 reserves

B. **Planned Application of PHA Unspent Operating Fund and HCV Funding**

Original Funding Source	Beginning FY 2025 – Unspent Balances	Planned Application of Unspent Funds during FY 2025
HCV HAP	$77,756,000	$77,756,000

HCV Admin Fee	$-	$-
PH Operating Subsidy	$12,221,000	$-
Total	**$89,977,000**	**$77,756,000**

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

LMHA plans to use Public Housing operating subsidy reserves to off-set future anticipated PH-AMP budget deficits. LMHA is currently maintaining a reserve amount equivalent to five months of operations in the Public Housing Program.

As recommended by HUD, LMHA also strives to maintain four months of operating reserves in its HCV Program, e.g. HAP expense and Administrative Fees.

Additionally, LMHA plans to use unspent HCV HAP reserves for the uses listed in the table below.

No.	Description of Planned Use: Unspent HCV HAP	Dollar Amount	Timeline
1.	Public Housing Operating Expenses	$15,198,000	FY 2025
2.	COCC Operating Shortfall	$13,904,000	FY 2025
3.	Homeownership Preservation Program	$2,472,000	FY 2025
4.	Beecher Amenities (Baxter & Off-site Improvements)	$6,360,000	FY 2025
5.	Dosker Manor	$4,000,000	FY 2025
6.	Avenue Plaza	$3,000,000	FY 2025
7.	Iroquois Senior Living Community	$9,000,000	Through FY 2026
8.	Beecher CHOICE On-Site Development	$11,224,000	Through FY 2026
9.	Acquisition and development of low-income and/or mixed-income housing	$12,598,000	TBD
	Total Planned Uses of Unspent HCV Funds	**$77,756,000**	

C. Local Asset Management Plan

i.	***Is the MTW PHA allocating costs within statute?***	Yes
ii.	***Is the MTW PHA implementing a local asset management plan (LAMP)?***	No
iii.	***Has the MTW PHA provided a LAMP in the appendix?***	No

iv. ***If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan year.***

Not applicable.

D. Rental Assistance Demonstration (RAD) Participation

i. Description of the RAD Participation

Current RAD

LMHA has closed on a RAD transaction for 21 new construction units being built as part of PHASE IV of LMHA's Beecher Terrace Choice Neighborhoods Initiative redevelopment. Construction of these units will be underway during FY 2025.

RAD Near-Term Strategy

LMHA has adopted a Strategic Plan that includes performing Physical Conditions Assessments for the public housing portfolio; Many of these assessments were completed in FY 2023. The next step is the evaluation of prioritization of sites. The prioritization process will consider capital needs, potential funding, surrounding neighborhood dynamics, near-site development, ease of conversion as well as many other factors. Opportunities for Faircloth to RAD may also be considered as part of the overall mix of RAD possibilities. Once prioritized, select sites may be submitted for RAD conversion. As the Choice Neighborhoods Initiative at Beecher Terrace moves toward completion, LMHA will have increased capacity to focus on RAD conversions. While specific sites have not been selected, once a site or multiple sites are selected, LMHA will submit a plan amendment prior to proceeding.

LMHA will continue to analyze opportunities to use the RAD program to reposition the scattered site portfolio. LMHA will continue to explore transferring subsidies through the RAD "transfer of assistance" provision from vacant, non-viable scattered public housing sites to project-based Section 8 vouchers.

RAD Long-Term Strategy

LMHA will consider RAD as one of the key tools available as it looks to preserve its Mixed-Finance affordable housing portfolio. After the 15-year LIHTC compliance period and after LMHA obtains ownership of each Liberty Green redevelopment phase, LMHA will consider RAD. LMHA may also consider Sheppard Square Mixed-Finance properties for RAD conversion but must first evaluate the impact of such conversion prior to its acquisition of the Limited Partnership through its option or Right of First Refusal.

LMHA will review market dynamics near public housing sites and may consider RAD at additional sites based on the prioritization process previously mentioned. The prioritization process will identify properties that may be converted quickly while other properties will become part of LMHA's long term strategy.

Table 15: RAD Conversions Planned in FY 2025

Property Name	No. of Units to be Converted	Conversion Type	Description
N/A	N/A	N/A	N/A

Table 16: RAD Conversions Completed or Projected to be Completed by the End of FY 2025

Rental Assistance Demonstration (RAD) Participation
LMHA has closed on a RAD transaction for 21 new construction units being built as part of PHASE IV of LMHA's Beecher Terrace Choice Neighborhoods Initiative redevelopment. Construction of these units will be underway during FY 2025.

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

Yes

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

The RAD Significant Amendment found in Appendix F has been updated to include the resident rights and participation requirements found in HUD Joint Notice H 2019-09/PIH 2019-23. This version of the RAD Significant Amendment was first included as an appendix to Amendment 1 of the agency's FY 2024 MTW Annual Plan, which was submitted to HUD for review in December 2023, and is still awaiting HUD approval.

VI. Administrative

E. Board Resolution and Certifications of Compliance

The required Board Resolution and signed MTW Annual Plan Certifications of Compliance with Regulations are attached in Appendix A.

B. Documentation of Public Process

The Housing Authority's FY 2024 MTW Annual Plan was made available for public comment from March 16, 2024 through April 15, 2024. Copies of the draft Plan were made available for public review on the Housing Authority's website, at the agency's offices (including Public Housing management offices), and by mail or email as requested. Resident councils were emailed an electronic copy, as were members of the public who had previously requested to be notified of changes to LMHA policies.

A public hearing was held via web conference on March 26, 2024 at 6 PM. A notice advertising the hearing and the public comment period appeared in the *Courier-Journal* on March 15, 2024. Fourteen individuals participated in the hearing. A copy of the public notice, a summary of comments and responses, and a sign-in sheet are attached in Appendix B.

C. Planned and Ongoing Evaluations

LMHA does not have any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities.

D. Lobbying Disclosures

LMHA does not have any lobbying activities to disclose. LMHA has included the Lobbying Activities form (SF-LLL) in Appendix C and Certification of Payments form (HUD-50071) in Appendix D.

VII. Appendices

Appendix A: Board Resolution and Certifications of Compliance

Board Resolution

RESOLUTION NO. _____

APPROVAL OF FY 2025 MOVING TO WORK ANNUAL PLAN

Item No. 5D

WHEREAS, the Louisville Metro Housing Authority (LMHA), as the Housing Authority of Louisville, executed a Moving to Work (MTW) Agreement on August 2, 1999; an Amended and Restated Agreement on April 15, 2008, which provides LMHA with some authority to investigate and adopt new policies and to flexibly use HUD funding and which extended participation in the MTW Program until June 30, 2018 and subsequently extended participation until June 30, 2028; an Amendment to the Amended and Restated Agreement on March 17, 2020, which authorized citations to waive an independent entity inspection; and an Amendment on March 16, 2023 to allow participation in HUD's Rental Assistance Demonstration program; and

WHEREAS, as a part of the Amended and Restated MTW Agreement, an MTW Annual Plan for Fiscal Year (FY) 2025 must be developed and submitted to HUD to formally enable LMHA to fully use the policy and budget flexibility provided to public housing agencies participating in the MTW Program; and

WHEREAS, a Board Resolution approving the proposed FY 2025 MTW Annual Plan and required Certifications must be included in the submission provided to HUD; and

WHEREAS, the proposed FY 2025 MTW Annual Plan was made available for public comment between March 16, 2024 and April 15, 2024 and a public hearing was held on March 26, 2024 to discuss the Proposed FY 2025 MTW Annual Plan.

RESOLUTION NO. _____

APPROVAL OF FY 2025 MOVING TO WORK ANNUAL PLAN

Item No. 5D

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2025 MTW Annual Plan is approved, and that the Executive Director and Contracting Officer, Elizabeth Strojan, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development.

BE IT FURTHER RESOLVED that the Secretary of the Board, Elizabeth Strojan, is hereby authorized to sign the required Certifications of Compliance.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2025 MOVING TO WORK ANNUAL PLAN

Item No. 5D

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 Agencies (PHA) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to evaluate 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 PHAs to combine federal resources from the Operating Budget, Capital Fund, and the Housing Choice Voucher 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 drafted for a five-year period. This agreement, which now covers the Louisville Metro Housing Authority (LMHA), was set to expire on 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 on April 15, 2008 and extended participation in the MTW Program until June 30, 2018. This date was later extended to June 30, 2028.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other PHAs. In compliance with this requirement, the LMHA Board of Commissioners is set to adopt the FY 2025 MTW Annual Plan on April 16, 2024, and the Plan will be submitted to HUD by April 19, 2024.

The FY 2025 MTW Annual Plan was made available for public comment from March 16, 2024, through April 15, 2024. A public hearing to discuss the proposed Plan was held on March 26, 2024.

APPROVAL OF FY 2024 MOVING TO WORK ANNUAL PLAN

Item No. 5D

I. STATEMENT OF FACTS (cont'd):

LMHA is proposing one new activity for FY 2025:

Activity 2025-1: Increasing Housing Options for Public Housing Families Transferring from Legacy Developments
LMHA proposes that any one-bedroom eligible household transferred from a legacy development (Dosker Manor, Avenue Plaza, or Parkway Place) as part of a significant rehabilitation, demolition, and/or disposition, be offered a two-bedroom voucher in lieu of a one-bedroom voucher.

LMHA also proposes non-significant amendments to the following activities:

Activity 2005-1: Special Referral MTW Housing Choice Voucher Programs
Special referral vouchers will be allocated to the following organizations*:

- Churchill's House of Hope: 10 vouchers to assist households that include a homeless pregnant person
- House of Ruth: 38 vouchers to households at 30% of AMI that include a member with HIV
- Inge's House: 10 vouchers for households that include a woman under a cancer treatment plan
- Louisville Metro Government Office of Safe and Healthy Neighborhoods: 10 vouchers for those who are in unstable and/or unsafe housing conditions due to being victims of gun violence
- Louisville Metro Police Department: 10 vouchers for the relocation of victims or witnesses of criminal activity
- My Chosen People: 70 vouchers for homeless households
- Pushing Forward, Inc.: 10 vouchers to households that include a member who has suffered a spinal cord injury
- Volunteers of America Mid-States: 80 vouchers to families that include a member who is a veteran and 100 vouchers to graduates of Unity House and Freedom House
- ZeroV: 35 vouchers for households that include a survivor(s) of domestic violence, dating violence, stalking, and/or sexual assault and that are exiting ZeroV's Rapid Re-Housing Program

*Provision of vouchers is subject to voucher availability.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2024 MOVING TO WORK ANNUAL PLAN

Item No. 5D

I. STATEMENT OF FACTS (cont'd):

Activity #2006-1: MTW Homeownership Program
LMHA plans to implement Small Area Fair Market Rents (SAFMR) effective January 1, 2025. Rather than base exception payment standard areas on census tracts, as is the current practice, the Housing Authority will move to a zip code-based system, allowing payments standards to go up to 120% of SAFMR in opportunity areas.

Activity #2007-1: Streamlined Recertification Process
LMHA will limit interim reexaminations for both the Public Housing and HCV programs to two per recertification cycle (for households on a biennial recertification schedule only). Elderly and disabled households will be exempt from this limitation and able to request an interim reexamination at any time. Households that add a family member through addition of a live-in aide or foster child/adult or through the birth of a child or adoption will also be exempted.

LMHA will allow a family to request an additional interim reexamination if the family experiences a long-term loss of income (90 days or longer) due to circumstances beyond the family's control.

Activity #2019-1: Enhancements to Local Project-Based Voucher (PBV) Program
LMHA will permit the Tenant Income Certification form to be used to verify income and assets for eligibility determinations and recertifications (both interim and regularly-scheduled) at PBV developments that use a third-party compliance reviewer to monitor income and asset calculations.

Activity #2020-2: Streamlined Flat Rent
LMHA will not increase the family's rent between triennial recertifications.

Activity #2020-3: Local Forms
The Housing Authority will stop using its local version of the Local Authorization for Release of Information/Privacy Act Notice (which replaces form HUD-9886) upon implementation of HOTMA.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF FY 2024 MOVING TO WORK ANNUAL PLAN

Item No. 5D

I. STATEMENT OF FACTS (cont'd):

The required Certifications of Compliance are provided as Attachment A to this resolution.

II. ALTERNATIVES:

A. Approve the submission of the proposed FY 2025 Moving to Work Annual Plan.

B. Do not approve the submission of the proposed FY 2025 Moving to Work Annual Plan.

III. RECOMMENDATION:

Staff recommends Alternative "A."

IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2025 MTW Annual Plan. Approval of the FY 2025 MTW Annual Plan by Board Resolution is necessary to permit LMHA to update, maximize, and improve the MTW activities.

Submitted by: Sarah Galloway
Special Assistant to the Executive Director
April 16, 2024

Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2024), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C–1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

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

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Louisville Metro Housing Authority	*KY-001*
MTW PHA NAME	***MTW PHA NUMBER/HA CODE***

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

Elizabeth Strojan	*Secretary of the Board*
NAME OF AUTHORIZED OFFICIAL	***TITLE***
	April 18, 2024
SIGNATURE	***DATE***

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

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

Appendix B: Documentation of Public Process

Public Hearing and Comment Period Newspaper Advertisement

Courier-Journal: March 15, 2024

Classifieds

To Advertise, visit our website: **classifieds.courier-journal.com**
- Public Notices/Legals email: **legals@courier-journal.com**
- Business & Services email: **servicedirectory@courier-journal.com**
- To post job openings, visit: **courier-journal.com/jobs**

All classified ads are subject to the applicable rate card, copies of which are available from our Advertising Dept. All ads are subject to ap the right to edit, refuse, reject, classify or cancel any ad at any time. Errors must be reported in the first day of publication. Louisville C results from an error in or omission of an advertisement. No refunds for early cancellation of order.

Adopt Me Pets
all your favorites...

Domestic Pets

AKC Labrador Retrievers Beautiful gentle black Labrador retrievers 2 females born 1/6/24 ready for furever homes now. Vet checked first vaccinations and dewormed. Located Leavenworth IN. 8122678656 call or text anytime

English Mastiff Pups, 6 wks, AKC Reg., 3 males, 2 females, fawn, UTD on shots, $1000. 502-851-7400

Assorted Stuff
all kinds of things...

Antiques & Collectibles

1952 Willett Cherry Dining Suite Double Drop Leaf Table w/extra leaf, custom pads. 5 Ladder back chairs. Buffet 4 drawers, 2 doors and shelf. Hutch 3 drawers, 2 doors and 3 shelves, original glass and hardware. All

Careers Jobs
new beginnings...

General

Executive Director Buffalo Trace Area Development District is accepting applicants for the position of Executive Director. Information available at www.btadd.com. EOE

Professional Service
all your needs...

Home Improvement

Hauling Anything
Yardwork-Weeding-Trimming
Lot Clearing-House Clean-Outs
Handyman Services
502-365-7343 Louis

Acreage

religion, sex, handicap, familial status, national origin, or intention to make any such preference, limitation, or discrimination. We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.

Apartments

Hurstbourne, Louisville: NOW LEASING New Senior Affordable Housing, income based, for age 55+. 1 & 2 BR, open floor plan, fully equipped kitchen, W/D hookup. Secured bldg. Apply Today by calling 502-861-8000 or email: hurstbourne@romanmanagement.com TTY: 1-800-648-6056

Automotive Wheels
best deal for you...

Cars

2012 Scion, purchased 3/1 for $11,000 dirven one time. 111k mi. New tires, 40 mi/gall. Asking $8,000 502-254-3203

Classic and Antique

A Buyer of Old Cars Classic & Antique: 1930s, 40s, 50s, 60s, 70s Running or not. Call: 513-403-7386

SUVs / Trucks

Dodge Ram 2003 Dodge duley extended cab V-10 hemi, 8 ft bed, red w/ flames,like new inside. 86,000 actual miles. One owner Has been babied since it was bought. Road ready, $25,000 270-597-7353

1959 DODGE D100
PICK-UP TRUCK
Good Condition.
Best Offer!

Louisville Metro Housing Authority (LMHA) – Public Hearing and Public Comment Period for: 1) FY 2025 Moving to Work (MTW) Annual Plan; 2) Changes to Public Housing (PH) Admissions & Continued Occupancy Policy; 3) Changes to Housing Choice Voucher (HCV) Program Administrative Plan and 4) Proposed Disposition of 17 Proposed Disposition of 17 units on Heafer Road and 10 condo units on Bayberry Drive. There will be a public hearing to discuss the topics listed above on March 26th, 2024 at 6:00 PM. Members of the public are encouraged to participate via Zoom at https://www.zoom.us/; click on "Join a Meeting", and enter Meeting ID#: 858 9276 2388 Passcode: 629975. Draft documents will be available for review and public comment from March 18, 2024, to April 15, 2024, on LMHA's website (www.lmha1.org); at LMHA's main office (420 S. 8th St.); HCV office (600 S. 7th St.); and at Public Housing Management Offices. Written comments may be mailed to the Housing Authority's main office or emailed to proctor@lmha1.org. Accommodations for disabled or non-English speaking persons will be made available upon advance request. For additional information or for Zoom link, call (502)569-6933. TDD: (502)587-0831.

Govt Bids & Proposals

SEALED BID REQUEST
Okolona Fire Protection District (OFPD) 8501 Preston Hwy Louisville KY 40219 is seeking sealed bids for Station 1 Office Remodel 2nd Floor. Contact Kelly Cooper kcooper@keyesarchitects.com for mandatory specifications. Bids are due 4/3/2024 by 4:00 PM at the above address at which time bids will be opened and read aloud at a OFPD Board of Trustees special meeting. OFPD reserves the right to reject any & all bids or to accept that bid or those bids determined to be in OFPD's best interest.
March 15 2024
LSBN0073270

Govt Public Notices

Liquor License Affidavit - Smokeasy The Private Lounge Smokeasy The Private Lounge LLC, Mailing address 6407 Bardstown Rd. #262, Louisville, KY 40291 hereby declares

NOTICE OF PUBLIC HEARING
LEGISLATIVE PUBLIC HEARING ON THE PROPOSED USE AND DISTRIBUTION FOR FEDERAL BLOCK GRANT FUNDS CONTAINED IN THE 202[illegible] SOCIAL SERVICES BLOCK GRANT APPLICATION WILL BE HELD AS FOLLOWS:
COMMITTEE: JOINT SENATE AND HOUSE ON FAMILIES AND CHILDREN
DATE: MARCH 21, 2024
TIME: 9:00 A.M.
PLACE: ROOM 171, CAPITOL ANNEX
FRANKFORT, KENTUCKY

THE PUBLIC HEARING WILL BE CONDUCTED BY BOTH THE SENATE AND HOUSE COMMITTEES ON FAMILIES AND CHILDREN OF THE KENTUCKY LEGISLATIVE RESEARCH COMMISSION. PUBLIC COMMENTS ARE INVITED.

Real Estate Homes

Public Hearing Sign-In Sheet

Name	Affiliation
Eric Proctor	LMHA
Sarah Galloway	LMHA
Carla Evans	
Elizabeth Strojan	LMHA
Tonya Wise	LMHA
Dan Farrell	LMHA
Greg Crum	LMHA
Leigh Ann Yost	Choosewell Communities
Tony Manning	President of Sheppard Square Resident Council
Ucresia Sistrunk	LMHA
843-324-3897	
Mary Ann Taylor	
Tracy Holmes-Bell	LMHA
502-648-4481	

Public Comments

Voucher Request from My Chosen People:

Additional Vouchers

- **Number of vouchers requested:**

    1. The request was 70 vouchers but will are honored for whatever we can get.

- **A brief description of the population they will be serving and the ongoing services to be provided to participants**:

    2. We are serving single mothers that are homeless, men that are homeless and needing work, we also are assisting elderly men and women in need of housing. Each client has a case manager and a community service worker that assist them with other resources as well (ex. Deposits, furniture, rental assistance etc).

- **Whether these vouchers are tied to specific units (i.e., residents have to live at a specified address) or whether participants are able to select their own apartment/house to live in.**

    3. Case managers and community service assistance help each client with finding a safe place to live. If clients have a preference, we try to accommodate them by finding housing. Our organization has a housing packet that we give clients if they need assistance, but some prefer to do it on their own.

- **A statement verifying that they do not discriminate on the basis of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, sexual orientation, gender identity, lawful source of income, conviction history (excluding convictions for offenses outlined in local ordinance), arrest history, prior military service, or homeless status.**

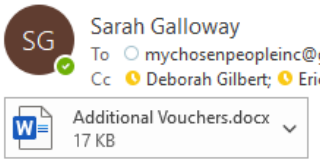
    4. Yes, we do have a statement that indicates this law.

Please let me know if you have any questions or concerns, we appreciate being a part of this program.

Sandra Marshall King
Founder/Owner
My Chosen People Inc.
502-592-2009

Response to My Chosen People Voucher Request:

FW: Additional Vouchers



Sandra,

LMHA is pleased to conditionally allocate 70 additional special referral vouchers to My Chosen People.

This award is conditioned upon Board approval and HUD approval of LMHA's FY 2025 Annual Plan.

LMHA's Annual Plan is typically approved by HUD on or about July 1, and these vouchers would be available immediately upon approval.

Please let me know if you have any questions.

Sarah Galloway

Sarah Galloway
Special Assistant to the Executive Director
Louisville Metro Housing Authority
Office: 502-569-3422
Work Cell: 502-693-0923
galloway@lmha1.org
www.lmha1.org

Voucher Request from Inge's House:

Re: FW: Section 8 Vouchers

TS Tiffany Stoner <ingehouseorg@gmail.com>
To Sarah Galloway
3/14/2024

This sender ingehouseorg@gmail.com is from outside your organization.

Inge'sHouseKynonprofitRegistry.JPG
86 KB

INGESHOUSENON-PROFIT.pdf
165 KB

Good Afternoon Sarah,

I appreciate you responding quickly to my phone call and the request for vouchers for Inge's House.

Inge's House is requesting 10 vouchers for your program to service women living with cancer to remove the barriers surrounding low socio-economic needs as it relates to their treatment plans. I am providing the requested information from your list provided in the email. Please let me know if additional information is needed.

1)Inge's House service women currently receiving under a treatment plan for any type of cancer.
2) Services includes, RN Case management, Counseling, Medical Transportation, Advocacy, Education, and Fellowship.
3)Address is 915 S 1s Street and 913 S. 1s Street, and other identified available apartments within the city.
4) Inge's House doesn't discriminate based on race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, sexual orientation, gender identity, lawful source of income, conviction history or current housing situation.
5)Inge's House Contact Information (915 S. 1s Street, Louisville, KY 40203, 502-821-2554, www.ingeshouse.org
6)Attached 501C3 status verification letter.

Response to Inge's House Voucher Request:

RE: FW: Section 8 Vouchers

SG Sarah Galloway
To Tiffany Stoner
Cc Eric Proctor; Deborah Gilbert

2:05 PI

Tiffany,

LMHA is pleased to conditionally allocate 10 special referral vouchers to Inge's House.

This award is conditioned upon Board approval. The Board will vote on voucher allocation at its regularly-scheduled meeting on April 16, and vouchers will be available the following day.

Eric – Please add these vouchers to the Section 8 Administrative Plan.

Sarah Galloway

Sarah Galloway
Special Assistant to the Executive Director
Louisville Metro Housing Authority
Office: 502-569-3422
Work Cell: 502-693-0923
galloway@lmha1.org
www.lmha1.org

Voucher Request from Louisville Metro Government Office of Safe and Healthy Neighborhoods:

From: Reed, Tonika <tonika.bacon@louisvilleky.gov>
Sent: Tuesday, March 26, 2024 12:58 PM
To: Deborah Gilbert <gilbert@LMHA1.org>; Cherry, Connie <connie.cherry@louisvilleky.gov>
Cc: Tracy Holmes-Bell <hbell@LMHA1.org>; Reed, Tonika <tonika.bacon@louisvilleky.gov>
Subject: RE: Meeting Today

I checked on the 10 additional vouchers we discussed. The below is information that is needed for the record. Please send me the response to these questions in a separate email.

- Number of vouchers requested (10 in this case)
  Increase 10 with a total of 30 voucher per year instead of 20
- A brief description of the population they will be serving and the ongoing services to be provided to participants.
  Outreach case management program looks to contribute to the overall collective effort to reduce gun violence within the Louisville Metro area by changing the behavior and attitudes of high-risk individuals who are at a greater threat to be involved in gun violence, either as a perpetrator and/or victim.

- Whether these vouchers are tied to specific units (i.e., residents have to live at a specified address) or whether participants are able to select their own apartment/house to live in
  Vouchers are not tied to specific units; residents select their own apartment/house to reside at

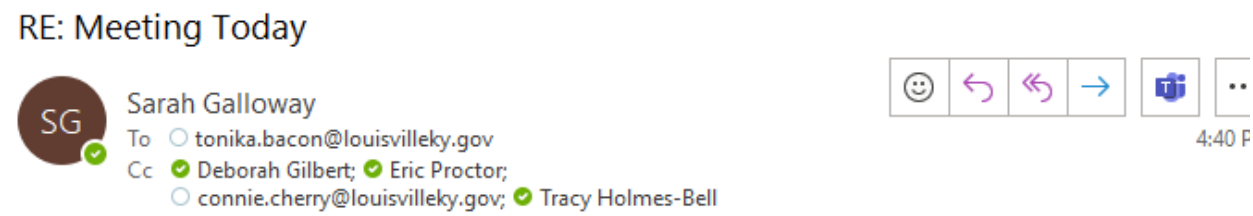
- A statement verifying they do not discriminate on the basis of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, sexual orientation, gender identity, lawful source of income, conviction history (excluding convictions for offenses outlined in local ordinance), arrest history, prior military service, or homeless status.
  OSHN / Pivot to Peace does not discriminate on the basis of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, sexual orientation, gender identity, lawful source of income, conviction history (excluding convictions for offenses outlined in local ordinance), arrest history, prior military service, or homeless status.

Thanks again,

Our Vision:
Louisville is a city of safe neighborhoods, where everyone is secure, supported, free of violence and prepared for lifelong success.

Tonika Reed (She, Her, Hers)
Pivot to Peace Program Manger
Office for Safe and Healthy Neighborhoods
908 W. Broadway
5th Floor
Louisville, KY 40203
Office (502) 574-5027
Cell (502) 794-1821
Tonika.Bacon@louisvilleky.gov

Response to Voucher Request from Louisville Metro Government Office of Safe and Healthy Neighborhoods:



RE: Meeting Today

SG

Sarah Galloway

To tonika.bacon@louisvilleky.gov

Cc Deborah Gilbert; Eric Proctor; connie.cherry@louisvilleky.gov; Tracy Holmes-Bell

4:40 P

Tonika,

LMHA is pleased to conditionally allocate 10 additional special referral vouchers to OSHN.

This award is conditioned upon Board approval. The Board will vote on whether or not to approve the allocation at it's regularly-scheduled meeting on April 16. The additional vouchers would then be available on April 17.

Please let me know if you have any questions.

Sarah Galloway

Eric – Please add these additional vouchers to the HCV Administrative Plan.

Sarah Galloway
Special Assistant to the Executive Director
Louisville Metro Housing Authority
Office: 502-569-3422
Work Cell: 502-693-0923
galloway@lmha1.org
www.lmha1.org

Comment from the Coalition for the Homeless

Coalition for the Homeless
louhomeless.org

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April 4, 2024

Louisville Metro Housing Authority
420 S. 8th Street
Louisville, KY 40203

Dear Louisville Metro Housing Authority,

Thank you for the opportunity to review and comment on proposed changes to the Louisville Metro Housing Authority (LMHA) plans. As the lead for the Continuum of Care in Metro Louisville, The Coalition for the Homeless would like to thank LMHA for your leadership and partnership in working to secure housing for the most vulnerable in our community. LMHA has consistently taken opportunities to target housing vouchers and vacancies in public housing to those who are unhoused. You have taken every opportunity to acquire new vouchers even with limited staffing and resources. You worked faster than most housing authorities across the country to allocate and fill housing opportunities during COVID and you have partnered with local nonprofits to make these opportunities successful.

It is exciting to see that new leadership at LMHA is working hard to address many issues created due to limited public funding and staffing including deferred maintenance in three older public housing facilities. We are aware that $11 million is just a first step, but your commitment to these tenants is shown in the process presented.

We are very thankful that with the expiring waivers from COVID, LMHA is still committed to making briefings virtual. This is a great service to many unhoused people who do not have access to transportation.

And, we are equally happy to see that you are working to address the backlog in recertifications both through allowing third party contractors to conduct the income verifications and allowing for bi-annual recertifications.

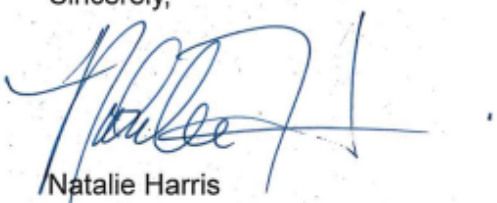
Like you, we are concerned about the loss of the local Source of Income ordinance which gives those with a housing voucher an equal opportunity to access housing, but we believe the landlord incentives and your willingness to work with landlords to address their issues as you have begun to do with tenants will help to keep landlords committed to the program.

Finally, we would like to thank you for working to balance the needs of homeless families with the loss of units that will be taken off line and the long waiting lists for assistance. We believe

prioritizing families with expiring FUP vouchers, the addition of special referral vouchers to Volunteers of America and maintaining a 25% preference for public housing will make sure those who are homeless in Louisville will still be prioritized and that the Louisville Continuum of Care can continue to meet our priorities in the community.

Thank you again for this opportunity to comment. We look forward to working together to meet both of our goals to house those in need in Louisville as you work to implement these plans. If you have any questions, please do not hesitate to contact me at 502-636-9550, extension 1212 or nharris@louhomeless.org.

Sincerely,



Natalie Harris
Executive Director

Summary of Public Hearing Comments & LMHA Responses

No comments were received at the FY 2025 MTW Annual Plan Public Hearing held on March 26, 2024 via web conference.

Appendix C: Disclosure of Lobbying Activities (SF-LLL)

Approved by OMB
0348-0046

Disclosure of Lobbying Activities

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

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

NOT APPLICABLE

	Telephone No.: _____ Date: _____
Federal Use Only	**Authorized for Local Reproduction** **Standard Form - LLL (Rev. 7-97)**

Appendix D: Certification of Payments (HUD-50071) Form

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

Louisville Metro Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work 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
Elizabeth Strojan	Executive Director

Signature	Date (mm/dd/yyyy)
Elizabeth Strojan	4/19/2024

Previous edition is obsolete

form HUD 50071 (01/14)

Appendix E: Anticipated Public Housing Units Capital Projects, Disposition, Demolition

The Louisville Metro Housing Authority (LMHA) anticipates that a number of public housing units will need to stand unoccupied for extended periods in order to accommodate major physical improvements, repairs, or renovation. Also, some units may need to be held vacant in preparation for their disposition or demolition.

This Appendix identifies units that are projected for significant capital improvements, disposition, or demolition. As the need arises, LMHA will request approval to assign the units' relevant Unit Tenant Statuses in HUD's Inventory Management/Public Housing Information Center (IMS/PIC) system to reflect their actual occupancy and utilization. Units receiving status changes for these activities will be characterized as either "Vacant HUD-Approved – Undergoing Modernization" or "Vacant HUD Approved - Demo/Dispo Approved."

All proposed/current unit tenant statuses are listed for FY 2025.

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
AMP KY001000002 – Beecher Terrace					
KY001000002	N/A	N/A	Beecher Terrace Tract 1 – 300 S. Roy Wilkins Ave (Northeast corner of 9th St. and W. Jefferson St.)	Demo/Dispo Proposed	Disposition of 1.56 acres of vacant land
KY001000002	N/A	N/A	Beecher Terrace Tract 4 – Southeast corner of 9th St. and W. Muhammad Ali Blvd.	Demo/Dispo Proposed	Disposition of 1.88 acres of vacant land
KY001000002	N/A	N/A	Beecher Terrace Tract 13 – Northwest corner of W. Jefferson St. and 13th St.	Demo/Dispo Proposed	Disposition of 1.89 acres of vacant land
KY001000002	N/A	N/A	Beecher Terrace Tract 14 – Northwest corner of W. Jefferson St. and 13th St.	Demo/Dispo Proposed	Disposition of 1.89 acres of vacant land
AMP KY001000003 – Parkway Place					

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000003	N/A	N/A	1705 S. 13th St.	Demo/Dispo Proposed	Disposition of non-dwelling structure (Keystone Learning Academy)
KY001000003	0306	030068	1216 W. Hill St., Apt. J	Undergoing Modernization	Before work can commence, an unauthorized occupant must be removed via a court process. Initial indications are that the unit will need drywall, plumbing, electrical, and some carpentry.
AMP KY001000005 - Iroquois					
KY001000005	N/A	N/A	1400 Bicknell Ave.	Demo/Dispo Approved	Disposition of 3.8 acres of vacant land (formerly public housing) for construction of a 60-unit Project-Based Voucher senior building
AMP KY001000012 – Dosker Manor					
KY001000012	1001	100015	413 E. Muhammad Ali Blvd. #110	Undergoing Modernization	Mold abatement
KY001000012	1001	100031	413 E. Muhammad Ali Blvd. #201	Undergoing Modernization	Mold abatement
KY001000012	1001	100065	413 E. Muhammad Ali Blvd. #310	Undergoing Modernization	Mold abatement
KY001000012	1001	100076	413 E. Muhammad Ali Blvd. #321	Undergoing Modernization	Mold abatement
KY001000012	1001	100081	413 E. Muhammad Ali Blvd. #401	Undergoing Modernization	Mold abatement
KY001000012	1001	100089	413 E. Muhammad Ali Blvd. #409	Undergoing Modernization	Mold abatement
KY001000012	1001	100117	413 E. Muhammad Ali Blvd. #512	Undergoing Modernization	Mold abatement
KY001000012	1001	100206	413 E. Muhammad Ali Blvd. #901	Undergoing Modernization	Mold abatement
KY001000012	1001, 1101, 1201	692 distinct	692 distinct unit addresses at 409, 413, and 415 E. Muhammad Ali Blvd.	Demo/Dispo Proposed	Demolition and disposition of 692 Public Housing units

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
		unit numbers			
AMP KY001000017 – Fegenbush – Whipps Mill					
KY001000017	1705	170012	1527 W. St. Catherine St.	Undergoing Modernization	Pipes froze while residents were absent from unit, flooding it. Flooring and subflooring will need to be replaced. The drywall will need to be taken out due to water damage. Kitchen cabinets will need to be replaced. Bathroom vanity will need to be replaced and plumbing will need to be repaired.
KY001000017	1706	170017	1537 W. St. Catherine St.	Undergoing Modernization	Extensive smoke damage must be remediated. Drywall will need to be repaired and carpentry.
KY001000017	1904	190064	3627 W. Broadway St. #4	Undergoing Modernization	Environmental mitigation, repairs, gut renovation & systems replacement
KY001000017	1907	190069	610 S. 24th Street #1	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement
KY001000017	1907	190070	610 S. 24th Street #2	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement
KY001000017	1907	190071	610 S. 24th Street #3	Undergoing Modernization	Remodel unit, replace cabinetry & plumbing fixtures, HVAC replacement
KY001000017	1912	190081	621 E. St. Catherine St. #1	Undergoing Modernization	Structural issues must be corrected. Floors are uneven.
KY001000017	2222	220132	2404 W. Chestnut St. #1	Undergoing Modernization	Structural issues must be corrected. Floors are rotted and must be replaced.
KY001000017	2405	240149	1814 Grand	Undergoing Modernization	Unit was vandalized, and piping and mechanical equipment were stolen. These must be replaced.
AMP KY001000034 – HOPE VI Scattered Sites					

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000034	3343	334007	1488 Bland St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3343	334008	1488 Bland St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3343	334009	1488 Bland St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3413	340201	1518 Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3413	340367	1518 Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3413	340353	1518 Magazine St. #5	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3543	350384	1521 W. Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
					equipped and underfunded – disposition proposed
KY001000034	3543	350361	1521 W. Magazine St. #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3543	350245	1521 W. Magazine St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3535	450317	1521 W. Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3535	350230	1529 W. Magazine St. #1	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3535	350239	1529 W. Magazine St. #2	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3535	350354	1529 W. Magazine St. #3	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000034	3417	350231	1529 W. Magazine St. #4	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3417	450278	12511 Townepark Way #101	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3417	340205	12511 Townepark Way #102	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	3417	340206	12511 Townepark Way #201	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
KY001000034	4582	458007	12511 Townepark Way #101	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.
KY001000034	4451	445001	1215 Heafer Rd., #A1	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4451	445002	1215 Heafer Rd., #A2	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4451	445003	1215 Heafer Rd., #A3	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4451	445004	1215 Heafer Rd., #A4	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000034	4451	445005	1215 Heafer Rd., #A5	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4451	445006	1215 Heafer Rd., #A6	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445007	1213 Heafer Rd., #B1	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445008	1213 Heafer Rd., #B2	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445009	1213 Heafer Rd., #B3	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445010	1213 Heafer Rd., #B4	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445011	1213 Heafer Rd., #B5	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4452	445012	1213 Heafer Rd., #B6	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4453	445013	1211 Heafer Rd., #C1	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4453	445014	1211 Heafer Rd., #C2	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4453	445015	1211 Heafer Rd., #C3	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4453	445016	1211 Heafer Rd., #C4	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4453	445017	1211 Heafer Rd., #C5	Demo/Dispo Proposed	Unit needs significant rehabilitation that would not be cost effective.
KY001000034	4582	458008	12511 Townepark Way #102	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000034	4582	458009	12511 Townepark Way #201	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.
KY001000034	4582	458010	12511 Townepark Way #202	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.
KY001000034	4582	458011	12511 Townepark Way #301	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.
KY001000034	4582	458012	12511 Townepark Way #302	Undergoing Modernization	Extensive fire damage. The entire 6-unit building will need complete rehabilitation. Structural damage, exterior, drywall, plumbing, electrical, cabinets, and HVAC.
KY001000034	N/A	N/A	768 Barret Ave.	Demo/Dispo Approved	LMHA has received HUD approval to dispose of this non-dwelling office space and anticipates closing on the transaction in FY 2025. This property is not and never has been Public Housing.
AMP KY001000043 – Stephen Foster					
KY001000043	N/A	N/A	3209 W. Kentucky St.	Demo/Dispo Proposed	LMHA plans to dispose of 0.91 acres of vacant land.
AMP KY001000061 – Sheppard Replacement					

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000061	6110	610401	2700 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6110	610402	2700 Holly Park Drive #5	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6110	610403	2700 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6110	610404	2700 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6100	610407	2702 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6100	610406	2702 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6111	610407	2702 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6111	610408	2702 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6111	610409	2702 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6111	610410	2704 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6112	610415	2704 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000061	6112	610417	2706 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6112	610420	2706 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6112	610421	2706 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6112	610422	2708 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6112	610425	2708 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610426	2708 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610427	2708 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610428	2710 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610429	2710 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610430	2710 Holly Park Drive #5	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6113	610431	2710 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000061	6114	610433	2710 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6114	610437	2712 Holly Park Drive #6	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6114	610439	2712 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6114	610440	2714 Holly Park Drive #3	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6114	610441	2714 Holly Park Drive #4	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6114	610442	2714 Holly Park Drive #1	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6115	610443	2714 Holly Park Drive #2	Undergoing Modernization	Environmental mitigation, structural repairs, gut renovation & systems replacement
KY001000061	6199	611114	1515 Cypress Street #116	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611115	1515 Cypress Street #117	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611116	1515 Cypress Street #118	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611117	1515 Cypress Street #119	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611118	1515 Cypress Street #120	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000061	6199	611119	1515 Cypress Street #121	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611120	1515 Cypress Street #122	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611121	1515 Cypress Street #123	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611122	1515 Cypress Street #124	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611123	1515 Cypress Street #125	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611124	1515 Cypress Street #201	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611125	1515 Cypress Street #202	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611214	1515 Cypress Street #216	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611215	1515 Cypress Street #217	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611216	1515 Cypress Street #218	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611217	1515 Cypress Street #219	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611218	1515 Cypress Street #220	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611219	1515 Cypress Street #221	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611220	1515 Cypress Street #222	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611221	1515 Cypress Street #223	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611222	1515 Cypress Street #224	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement

Development Code	Bldg. No.	Unit No.	Unit Address	Proposed/Current Unit Tenant Status	Work to be Completed
KY001000061	6199	611223	1515 Cypress Street #225	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611224	1515 Cypress Street #301	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	6199	611225	1515 Cypress Street #302	Undergoing Modernization	Environmental mitigation, unit repairs & reconfiguration, systems replacement
KY001000061	5602	560381	1327 W. Muhammad Ali Blvd./400 S. 13th St.	Demo/Dispo Proposed	Unit part of a condo regime. LMHA's experience is such units often do not function well, as the regime is often ill-equipped and underfunded – disposition proposed
No AMP					
N/A	N/A	N/A	643 Finzer St.	Demo/Dispo Proposed	LMHA plans to request approval to dispose of this non-dwelling building. This property is not and never has been public housing.
N/A	N/A	N/A	1327 W. Muhammad Ali Blvd./400 S. 13th St.	Demo/Dispo Proposed	LMHA plans to dispose of 1.7 acres of vacant land.
N/A	N/A	N/A	1638 W. Kentucky St., #15	Demo/Dispo Proposed	LMHA plans to dispose of this condominium unit.
N/A	N/A	N/A	431 E. Liberty St.	Demo/Dispo Proposed	LMHA plans to demolish a non-dwelling building and dispose of this parcel. This property is not and never has been Public Housing.

It should be noted that during the course of LMHA's operations, a unit or multiple units may require extensive capital investment and physical work due to circumstances such as fire or storm damage, extraordinary wear and tear, identification of unforeseen hazards or damage, and damage resulting from criminal activities. In such instances, LMHA may opt to add these units to those identified in this Appendix. As the need arises, LMHA will request approval to reassign the units' Unit Tenant Statuses in HUD's IMS/PIC system.

Appendix F: Rental Assistance Demonstration (RAD) Significant Amendment

Rental Assistance Demonstration Significant Amendment #2

The Louisville Metropolitan Housing Authority (LMHA) is incorporating this Rental Assistance Demonstration (RAD) Significant Amendment #1 into its Fiscal Year 2021 Moving to Work (MTW) Annual Plan as required by the US Department of Housing and Urban Development (HUD). The Amendment provides information on LMHA's planned activities under the Rental Assistance Demonstration (RAD) program.

Pursuant to this Amendment, LMHA proposes to convert 21 units of public housing assistance from the former Beecher Terrace development to PBV assistance under the RAD transfer of assistance provisions. Redevelopment of Beecher Terrace is currently funded by a Choice Neighborhoods Implementation Grant, and this RAD conversion is an integral part of the larger redevelopment strategy.

Background

The HUD Office of Public Housing Investments approved demolition under Section 24 of all 768 ACC units of public housing at Beecher Terrace on July 27, 2018 in connection with a Choice Neighborhoods Initiative (CNI) Grant. The first two phases of the project have been demolished. Of the remaining units that are standing, only 21 units are eligible for RAD, and a Commitment to Enter into Housing Assistance Payments (CHAP) was issued for those units on October 25, 2019.

Pursuant to a Converted Awaiting Transfer Agreement effective December 1, 2019, assistance will be transferred under RAD to 21 newly constructed units, which will be developed in the final 2 phases of redevelopment over the remaining life of the Beecher Terrace Choice Neighborhoods project.

LMHA intends to proceed with the RAD conversion of the public housing assistance to project-based assistance, pursuant to the guidelines of PIH Notice 2019-23, (RAD Notice REV-4) dated September 5, 2019 and PIH Notice 2016-17 dated November 10, 2016 ("HUD RAD Notices") and any other successor Notices issued by HUD, as well as the requirements set forth in the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and Grant Agreement.

LMHA is required to submit a Significant Amendment to the MTW Annual Plan that incorporates required information on LMHA's RAD conversion plans. This document provides the required information and serves as LMHA's RAD Significant Amendment for the subject units. LMHA intends to propose further Significant Amendment(s) for additional HUD-approved RAD conversions, including potential transfers of assistance, at future dates. LMHA will provide a thirty-day public comment period and conduct a Public Hearing to allow residents and the general public an opportunity to review and comment on the RAD Significant Amendment. The LMHA Board of Commissioners will conduct a vote on the RAD Significant Amendment at a future public meeting.

RAD Conversion Plan

This Significant Amendment provides information on LMHA's plans to convert public housing units to project-based assistance under the transfer of assistance provisions of RAD as follows:

- HUD awarded Beecher Terrace / Vision Russell a Choice Neighborhoods Initiative Implementation Grant of $29.5 million in 2016. As of June 28, 2016, the date of the Beecher Terrace Choice Neighborhoods Implementation grant submission, several units at Beecher were identified as either non-dwelling units or were vacant. These vacant and non-dwelling units were not included in any of the three Tenant Protection Voucher (TPV) applications that LMHA submitted for the relocation of Beecher's residents. LMHA will use the RAD transfer of assistance program to convert the public housing assistance associated with the 21 units that did not receive TPVs.

- These 21 RAD units will be replacement units developed under the Transformation Plan. LMHA anticipates 21 new construction RAD units on the former Beecher Terrace public housing site, which is continuing to undergo a complete demolition of all former public housing units. The current Beecher Terrace Housing Plan includes a Phase IV that comprises the on-site replacement of 141 units. LMHA anticipates that development of the RAD units will be included in this phase. Phase IV financing is anticipated to use tax-exempt bonds, 4% low-income housing tax credits, an FHA-insured mortgage and LMHA subordinate funds, as well as Choice Neighborhoods Implementation Grant funding. The target closing date for Phase IV is June 2021.

Attachment 1 includes current information on the proposed RAD conversion. Attachment 1 includes the following information:

Current Units:	Total number of units, bedroom size distribution and unit type.
Post-Conversion Units:	If applicable, any changes proposed to the current number of units, the bedroom size distribution or the unit type including de minimis reductions. No unit reductions are proposed under this Significant Amendment.
Transfer of Assistance:	Whether LMHA intends to transfer assistance to another development as part of the RAD conversion and, if so, the location, number of units, bedroom size distribution, and unit type where known. LMHA proposes a transfer of assistance.
PBV or PBRA:	Whether LMHA intends to convert the development to the Project Based Voucher (PBV) program or to the Project Based Rental Assistance (PBRA) program. LMHA intends to convert assistance to the PBV program.
Capital Fund Impact:	The current amount of Capital Fund dollars received prior to RAD conversion. Developments converted through the RAD program are not eligible for Public Housing Capital Funds after conversion.

Transfer of Waiting List: How existing waiting lists will be addressed as part of the conversion.

Conversion to Project Based Vouchers or Project Based Rental Assistance

Public housing developments that are converted to project-based assistance will no longer be subject to HUD rules and regulations pertaining to the public housing program. Upon conversion to RAD, the former public housing units will be subject to the rules and regulations pertaining to either the PBV or PBRA programs, depending on which program option is selected by PHA. HUD has modified the PBV and PBRA program rules and regulations to incorporate additional provisions that apply solely to units converted under RAD. These additional provisions provide important protections to current residents of public housing that are impacted by a RAD conversion.

LMHA intends to convert the developments/units listed in Attachment 1 to the PBV program. As part of the conversion initiative, LMHA will adopt all required RAD PBV rules except where MTW or other waivers are approved by HUD, and will modify its existing Housing Choice Voucher Program Administrative Plan as needed to incorporate those rules related to resident rights, resident participation, waiting list, lease, waiting list, grievance processes and other areas.

Attachment 2 provides information on the RAD PBV program as required by the HUD RAD Notices related to resident rights and participation, waiting list and grievance procedures.

Capital Fund Budget

Conversion of existing public housing developments under the RAD program will enable LMHA to leverage existing funds to secure additional private and other funding. This new funding will be used to undertake long-deferred capital improvements and, in instances where transfer of assistance is involved, to construct or rehabilitate new or existing affordable housing units.

LMHA currently receives HUD Capital Funds on an annual basis, subject to Congressional appropriations for the majority of its public housing units. Attachment 1 includes the most recent Capital Fund allocation for the proposed RAD conversion site. Upon conversion to RAD, LMHA will no longer receive a Capital Fund allocation for units that have been converted, and the annual Capital Fund grant will be decreased.

The total estimated reduction in LMHA Capital Funds on an annual basis for the subject units covered under this Significant Amendment is approximately $57,295 annually based on FY2019 funding levels ($2,728.50 per unit per year). Over a five-year period, the estimated Capital Fund reduction is approximately $286,477 based on FY2019 funding levels. The actual amount of reduction may vary depending on Congressional appropriations. As RAD conversions are completed, LMHA will modify its existing capital plans to reflect the reduction in funding and change in work scopes.

LMHA does not have a Capital Fund Financing Program (CFFP) obligation.

LMHA anticipates developing the RAD units as part of onsite Phase 4. The Phase 4 financing is anticipated to use tax-exempt bonds, 4% low-income housing tax credits, an FHA-insured

mortgage and LMHA subordinate funds, as well as Choice Neighborhoods Implementation Grant funding. Actual amounts will be incorporated into the final financing plan.

Fair Housing Requirements

Per PIH Notice 2019-23 (HUD RAD Notice REV-4), Section 1.2E, properties being redeveloped with funding under a Choice Neighborhoods Implementation (CNI) grant are not subject to the RAD Fair Housing, Civil Rights, and Relocation Notice (PIH 2016-17).

Per the requirements of Notice PIH 2016-17, Section 1.3, LMHA will adhere to the provisions of the applicable Choice Neighborhoods Notice of Funding Availability (NOFA) and grant agreement regarding site and neighborhood standards.

Relocation Plan

Please note that the only units that are eligible to convert to RAD were vacant, therefore, LMHA does not have any relocation obligations associated with these units. Separately, LMHA is implementing its Relocation Plan associated with the Choice Neighborhood Implementation Grant.

Compliance

LMHA is not presently subject to a voluntary compliance agreement, consent order, consent decree, final judicial ruling or administrative ruling or decision that has any relation to or impact on the planned RAD conversion.

Moving-To-Work (MTW)

LMHA may utilize MTW Block Grant fungibility and programmatic flexibility to support the RAD conversion effort subject to any necessary Board and HUD approvals. LMHA certifies that regardless of any funding changes that may occur as a result of conversion under RAD, LMHA will continue to administer and maintain service levels for its remaining portfolio of public housing units subject to funding availability. LMHA will do this by utilizing available funding including Public Housing Operating Fund, Capital Fund, and Tenant Rental Income.

Significant Amendment Definition

As part of the RAD conversion initiative, a Significant Amendment to the MTW Plan will not be required for the following RAD-specific actions:

- Changes to the Capital Fund budget produced as a result of each approved RAD conversion regardless of whether the proposed conversion will include use of additional Capital Funds;

- Decisions to apply MTW funding or programmatic flexibility to post-conversion RAD developments;

- Decisions or changes related to the ownership and/or financing structures for each approved RAD conversion including decisions to allocate LMHA financial resources as a source of funds to support the RAD conversion initiatives;

- Changes to the construction and rehabilitation plans and scheduled for each approved RAD conversion;

- Changes to the project names or sponsor entity names;

- Changes in the post-conversion bedroom size distribution and/or the number of de minimis unit reductions up to the 5% permitted under RAD program rules;

- Changes to the pre-conversion bedroom size distribution and/or the project or AMP from which transfer of assistance units will be converted; and,

- Decisions to convert to either Project Based Vouchers or Project Based Rental Assistance.

Louisville Metro Housing Authority Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment #2 Attachment 1 – Information on Public Housing Developments to be Converted

Development Name	Beecher Terrace		
PIC Development ID #	KY0010000002		
Conversion Type (PBV or PBRA)	PBV		
Capital Fund Grant (FFY19)	$57,295		
Pre-Conversion Total Units	21		
Pre-Conversion Unit Type	Family		
Pre-Conversion Bedroom Size:			
1 BR	9		
2 BR	6		
3 BR	6		
Post-Conversion Total Units	21		
Post-Conversion RAD Units	21		
Post-Conversion Unit Type	Family		
Post- Conversion Development	Beecher Terrace Phase IV		
Post-Conversion Sponsor Entity	Beecher IV, LLC		
Name and Address	Beecher Terrace Phase IV		
Project Description	LMHA anticipates developing the RAD units as part of onsite Phase 4. The Phase 4 financing is anticipated to use tax-exempt bonds, 4% low-income housing tax credits, an FHA-insured mortgage and LMHA subordinate funds, as well as Choice Neighborhoods Implementation Grant funding. Actual amounts will be incorporated into the final financing plan.		
Post-Conversion Bedroom Size			
	Total # of Units	**# of RAD Units**	
0 BR	0	0	
1 BR	59	9	

2 BR	51	7		
3 BR	31	5		
4 BR	0	0		
5 BR	0	0		
6 BR	0	0		
Transfer of Assistance	Yes			
De Minimis Reduction	N/A			
How will Transfer of Waiting List be accomplished?	Since the 21 RAD-eligible units were vacant or non-dwelling units, there is not a waiting list associated with these units. LMHA has made a commitment that all former Beecher residents have a lifetime right to return (assuming residents are lease compliant).			

Moving to Work Annual Plan
Rental Assistance Demonstration Significant Amendment #2 Attachment 2 – Project Based Voucher Program (PBV)

Information on resident rights and participation, waiting list and grievance procedures for Rental Assistance Demonstration (RAD) program conversions to the Project Based Voucher (PBV) program are included in this attachment.

The resident rights and participation requirements and grievance procedures found in Section 1.6 of HUD Joint Notice H 2019-09/PIH 2019-23 ("HUD RAD Notice") apply to this project and are as follows:

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.[1] Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of tenants for initial occupancy, will not apply for current households. Once the grandfathered household moves out, the unit must be leased to an eligible family. MTW agencies may not alter this requirement. Further, so as to facilitate the right to return to the assisted property, HUD waives Section 8(o)(4) and 24 CFR § 982.201 to the extent necessary for this provision to apply to current public housing residents of the Converting Project that will reside in non-RAD PBV units or non-RAD PBRA units placed in a project that contain RAD PBV units or RAD PBRA units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR Part 983 for non-RAD PBV units and the PBRA requirements governing the applicable contract for non-RAD PBRA units.

2. **Right to Return**. See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

   Section 1.4.A.5.b states that

   > Any resident that may need to be temporarily relocated to facilitate

[1] These protections (as well as all protections in this attachment for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project's conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Where the transfer of assistance to a new site is warranted and approved (see Section 1.4.A.12), residents of the Converting Project will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. For more information on how to implement these provisions see the RAD Fair Housing, Civil Rights, and Relocation Notice.

The RAD Fair Housing, Civil Rights, and Relocation Notice, Section 6.2, states that:

> Any public housing or Section 8 assisted resident that may need to be relocated temporarily to facilitate rehabilitation or construction has a right to return to an assisted unit at the Covered Project once rehabilitation or construction is complete.[2] Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project's conversion of assistance. The Project Owner satisfies the RAD right to return to a Covered Project if the Project Owner offers the resident household either: a) a unit in the Covered Project in which the household is not under-housed; or b) a unit in the Covered Project which provides the same major features as the resident's unit in the Converting Project prior to the implementation of the RAD conversion. In the case of a transfer of assistance to a new site, residents of the Converting Project have the right to reside in an assisted unit meeting the requirements set forth in this paragraph at the Covered Project (the new site) once the Covered Project is ready for occupancy in accordance with applicable PBV or PBRA requirements.
>
> If proposed plans for a Converting Project would preclude a resident from returning to the Covered Project, the resident must be given an opportunity to comment and/or object to such plans. Examples of project plans that may preclude a resident from returning to the Covered Project include, but are not limited to:
>
> - Changes in bedroom distribution which decrease the size of units such that the resident would be under-housed;[3]
> - Where a) the PHA is reducing the number of assisted units at a property (if authorized to do so under Section 1.5.B of the RAD Notice) and b) the resident cannot be accommodated in the remaining

[2] The right to return is not a right to any specific unit in the Covered Project. Tenancies other than public housing or Section 8 assisted residents (such as commercial tenants) do not hold a right to return and are subject to standard relocation requirements applicable to such tenants under the URA.

[3] See the RAD Notice for a description of the procedures that must be undertaken if a resident is over-housed.

assisted units;

- The imposition of income eligibility requirements, such as those associated with LIHTC or other program financing, under which the current resident may not be eligible;[4] and
- Failure to provide reasonable accommodation to an individual with disabilities, in violation of applicable law, which reasonable accommodation may include installation of accessibility features that are needed by the individual with disabilities.[5]

If the resident who would be precluded from returning to the Covered Project objects to such plans, the PHA must alter the project plans to accommodate the resident's right to return to the Covered Project.

If the resident who would be precluded from returning to the Covered Project prefers to voluntarily and permanently relocate rather than object to the project plans, the PHA must secure informed, written consent to a voluntary permanent relocation in lieu of returning to the Covered Project and must otherwise comply with all the provisions of Section 6.10, below, regarding alternative housing options. The PHA cannot employ any tactics to pressure residents into relinquishing their right to return or accepting alternative housing options. A PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

In the case of a multi-phase transaction, the resident has a right to return to the Covered Project or to other converted phases of the property which have converted and are available for occupancy at the time the resident is eligible to exercise the right to return. A relocated resident should get the benefit of improvements facilitated by the resident's relocation and conversion and completion of future phases cannot be assured. In most cases, this means that the resident's right to return must be accommodated within the Covered Project associated with resident's original unit. However, in those cases where improvements to multiple phases of a site are occurring simultaneously, the PHA or Project Owner may treat multiple Covered Projects on the same site as one for purposes of the right to return. If the PHA or Project Owner seeks to have the resident exercise the right of return at a future phase, the PHA or Project Owner would need to secure the resident's consent to such plan as an alternative housing option pursuant to Section 6.10, below.

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[4] In these cases, a PHA may elect to exclude some units from the applicable financing program, for example, claiming LIHTC for a subset of the units and not claiming tax credits in connection with the units occupied by households over the LIHTC maximum eligibility of 60% of AMI.

[5] Refer to the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, Reasonable Modifications Under the Fair Housing Act (March 5, 2008), at http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf for additional detail regarding applicable standards for reasonable accommodations and accessibility features which must be provided. If the resident has paid for installation of accessibility features in the resident's prior unit, the PHA or Project Owner shall pay for the installation of comparable features in the new unit. Violations of law may also result in other sanctions.

In implementing the right of return, the Project Owner shall comply with all applicable fair housing laws and implementing regulations, including, but not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and Titles II and III of the Americans with Disabilities Act.

3. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or $25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

   The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

   Three Year Phase-in:
   - Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
   - Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
   - Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP[6]

   Five Year Phase in:
   - Year 1: Any recertification (interim or annual) performed prior to the second annual

[6] For example, where a resident's most recently paid TTP is $100, but the Calculated PBV TTP is $200 and remains $200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of $100 to $133. At the second AR, the resdient's contribution would increase by 50% of the $66 differential to the standard TPP, increasing to $166. At the third AR, the resident's contribution would increase to $200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents, but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

4. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program. The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement.

   If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

   However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.[7] Further, upon conversion to PBV, if the

[7] The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now have a merged program, a conversion to PBV should not impact their FSS participants.

PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.[8]

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016- 08.pdf.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

5. **Resident Participation and Funding.** In accordance with Attachment 1B of Notice PIH 2019-23, REV 4, residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

    a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be :
        i. A reasonable period of time, but not to exceed 30 days:
            1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
            2. In the event of any drug-related or violent criminal activity or any felony conviction;
        ii. Not less than 14 days in the case of nonpayment of rent; and

[8] Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

iii. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),[9] an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
    1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
    2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
iv. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

7. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

[9] § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

LMHA has used its Moving to Work authority to waive the EID requirement.

8. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

   The Louisville Metro Housing Authority does not have a Jobs Plus grant.

9. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section

1.6.B.5 of this Notice.[10] In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing opportunities.

[10] For example, a public housing family residing in a property converting under RAD has a TTP of $600. The property has an initial Contract Rent of $500, with a $50 Utility Allowance. Following conversion, the residents is still responsible for paying $600 in tenant rent and utilities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

10. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the underoccupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

11. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program- wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:

    - Transferring an existing site-based waiting list to a new site-based waiting list.
    - Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
    - Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
    - Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

    For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

    To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance

with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community- wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).[11]

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

[11] For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

A PHA must maintain any site-based waiting list in accordance with all applicable civil rights and fair housing laws and regulations.

12. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant- based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant- based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD . MTW agencies may not alter this requirement.

By way of summary and not as a modification of the program requirements set forth in the Notice provisions referenced, please note that the foregoing tenant protections for RAD PBV residents apply to non-RAD PBV residents of the same Covered Project with the exception of Choice Mobility. Standard PBV Choice Mobility requirements apply to non-RAD PBV residents.

As this project is funded with a Choice Neighborhoods implementation grant, per Notice PIH 2019-23, Section 1.2.E, HUD Joint Housing Notice H-2016-17, PIH-2016-17 dated November 10, 2016 does not apply to this project.