

RESOLUTION NO. _____

**APPROVAL OF AMENDMENT TO FY 2021 MOVING TO WORK ANNUAL PLAN
(APPROVAL OF VERSION 3)**

Item No. 5i

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

WHEREAS, as required by the Amended and Restated MTW Agreement with HUD, the Fiscal Year 2021 MTW Annual Plan (Version 1) was adopted by the LMHA Board of Commissioners on April 21, 2020 and submitted to HUD on April 23, 2020; and

WHEREAS, as HUD required revisions to the Fiscal Year 2021 MTW Annual Plan (Version 1), the Fiscal Year 2021 MTW Annual Plan (Version 2) was resubmitted to HUD on July 21, 2020 and approved on August 6, 2020; and

WHEREAS, the LMHA now finds it necessary to amend the FY 2021 MTW Annual Plan (Version 2) and submit a new FY 2021 MTW Annual Plan (Version 3) in order to propose new MTW activities and modify previously approved MTW activities that would implement emergency waivers, prevent eviction, and expand the Special Referral Programs; and

WHEREAS, a Board Resolution approving the FY 2021 MTW Annual Plan (Version 3) and required Certifications of Compliance must be included in the submission provided to HUD; and

RESOLUTION NO. _____

**APPROVAL OF AMENDMENT TO FY 2021 MOVING TO WORK ANNUAL PLAN
(APPROVAL OF VERSION 3)**

Item No. 5i

WHEREAS, the FY 2021 MTW Annual Plan (Version 3) was made available for public comment from December 5, 2020 through January 4, 2021, and a public hearing was held on December 17, 2020.

NOW, THEREFORE, BE IT RESOLVED BY THE LOUISVILLE METRO HOUSING AUTHORITY BOARD OF COMMISSIONERS that the FY 2021 MTW Annual Plan (Version 3) is approved, and that the Executive Director and Contracting Officer, Lisa Osanka, is hereby authorized to execute and submit the Plan to the U.S. Department of Housing and Urban Development; and

BE IT FURTHER RESOLVED that Board Chairman, Manfred Reid, is hereby authorized to sign the required Certifications of Compliance.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF AMENDMENT TO FY 2021 MOVING TO WORK ANNUAL PLAN (APPROVAL OF VERSION 3)

Item No. 5i

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 (PHAs) to meet specific local housing needs. The MTW Demonstration Program provides participating PHAs flexibility to test various housing approaches that achieve greater cost effectiveness, provide incentives to residents to obtain employment and become economically self-sufficient, and to increase housing choices for low-income families. MTW legislation allows participating PHAs to combine federal resources from the Operating Budget, Capital Fund, and the Housing Choice Voucher (HCV) Tenant-Based Rental Assistance programs, and the flexibility to efficiently utilize these HUD funding sources.

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

On December 20, 2007, HUD notified LMHA of its intent to amend and restate MTW agreements with participating PHAs. This new agreement was adopted by the Board on April 15, 2008 and extended participation in the MTW Program until June 30, 2018. On April 14, 2016, Congress extended the MTW demonstration to 2028. A second Amended and Restated Agreement was modified and approved on March 17, 2020.

MTW agencies are required to prepare and submit MTW Annual Plans in lieu of PHA Annual Plans, which are required of all other agencies. In compliance with this requirement, the LMHA Board of Commissioners adopted the FY 2021 MTW Annual Plan (Version 1) on April 21, 2020 and the Plan was submitted to HUD on April 23, 2020.

RESOLUTION BACKGROUND STATEMENT

APPROVAL OF AMENDMENT TO FY 2021 MOVING TO WORK ANNUAL PLAN (APPROVAL OF VERSION 3)

Item No. 5i

I. STATEMENT OF FACTS (cont'd):

HUD subsequently provided comments on the submitted FY 2021 MTW Annual Plan (Version 1). In response to these comments, LMHA made changes to the FY 2021 MTW Annual Plan (Version 1) and resubmitted a revised FY 2021 MTW Annual Plan (Version 2) to HUD on July 21, 2020. These revisions were approved by HUD on August 6, 2020.

The following items have been added or revised to the FY 2021 MTW Annual Plan in Version 3:

1. Proposed New MTW Activity:
2. Proposed New MTW Activity:
3. Modification to Previously Approved MTW Activity:

The required Certifications of Compliance are provided as Attachment A to this resolution. Full copies of the new and revised MTW activities are provided as Attachment B.

The full text of the FY 2021 MTW Annual Plan (Version 3) was made available for public comment from December 5, 2020 through January 3, 2020. A public hearing to discuss the proposed Plan was held on December 17, 2020.

II. ALTERNATIVES:

- A. Approve the submission of the proposed FY 2021 Moving to Work Annual Plan (Version 3).
- B. Do not approve the submission of the proposed FY 2021 Moving to Work Annual Plan (Version 3).

III. RECOMMENDATION:

Staff recommends Alternative "A".

RESOLUTION BACKGROUND STATEMENT

**APPROVAL OF AMENDMENT TO FY 2021 MOVING TO WORK ANNUAL PLAN
(APPROVAL OF VERSION 2)**

Item No. 5i

IV. JUSTIFICATION:

LMHA, in consultation with residents and the community, has developed the proposed FY 2021 MTW Annual Plan (Version 3). Approval of the FY 2021 MTW Annual Plan (Version 3) by Board Resolution is necessary to permit LMHA to take advantage of the flexibilities afforded through the MTW Program to increase housing options available to residents. All proposed revisions are subject to HUD approval.

Submitted by: Heath Rico-Storey
Compliance Manager
January 19, 2021

Attachment A

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/20/2021), 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, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 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 identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Louisville Metro Housing Authority
MTW PHA NAME

KY001
MTW PHA NUMBER/HA CODE

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

Manfred Reid
NAME OF AUTHORIZED OFFICIAL

Board Chair
TITLE

SIGNATURE

DATE

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

III. Proposed MTW Activities

PROPOSED ACTIVITY 2021-02: EMERGENCY WAIVERS

Activity Description

The COVID-19 outbreak threatens the lives of many families and the livelihoods of many more. It is an urgent health crisis of unprecedented scale, and one that is disproportionately impacting low-income families. The outbreak of COVID-19 also places additional burdens on housing authorities who are working tirelessly to respond to the needs of their participants while also maintaining compliance with program requirements. While the Coronavirus Aid, Relief and Economic Security (CARES) Act provides the U.S. Department of Housing and Urban Development (HUD) with broad authority to waive or establish alternative requirements for numerous statutory and regulatory requirements for the Public Housing program and Housing Choice Voucher (HCV) programs, the duration of this pandemic remains unknown and the national backlog of transactions, inspections and delayed reporting requirements grows. Accordingly, LMHA will use its MTW authority to establish an emergency waivers activity which addresses the burdens placed on all stakeholders as well as to mitigate the backlog of transactions at the end of the waiver period. LMHA proposes to establish the following emergency waivers 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, 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 conduct briefings 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. 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 all LMHA 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 and PBV program.

5. **Delayed Regular HQS Inspections:** LMHA will waive the requirement for completion of regular HQS inspections. Where a regular HQS inspection has been delayed, LMHA will complete the HQS inspection no later than the anniversary month of the following year. LMHA will continue to require a self-certification from the owner that no life-threatening conditions exist in the unit. LMHA will continue to conduct complaint inspections. This waiver applies to the HCV and PBV programs.
6. **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.
7. **HQS Quality Control Inspections:** LMHA will waive the requirement to conduct HQS quality control inspections and will suspend HQS quality control inspections until the emergency waiver has been lifted. This waiver applies to the HCV and PBV programs.
8. **Homeownership HQS:** LMHA will waive the requirement for the initial HQS inspection for homeownership units. LMHA will require a self-certification from the owner that no life-threatening conditions exist in the unit. For the HCV Homeownership Program, 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 and the local non-traditional Homeowner Protection Program.
9. **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.
10. **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.
11. **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.

12. 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.

13. 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.

14. 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.

Statutory Objective

This activity will reduce cost and achieve greater cost effectiveness in Federal expenditures. The time and labor cost related to completing the backlog of delayed transactions and inspections while maintaining current deadlines is such that it would place an onerous burden on the agency.

Implementation

LMHA will implement this policy upon approval of the MTW Plan.

Metrics

<i>CE #1: Agency Cost Savings *</i>				
Unit of Measurement	Baseline*	Benchmark*	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease)	\$181,924	\$90,962		

**The baseline reflects the cost of completion of all PH and HCV regular reexaminations for a one-year period. The benchmark reflects the cost of completion of one half the number of PH and HCV regular reexaminations in a one-year period.*

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	3,200		

***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.*

Need/Justification for MTW Flexibility

With respect to public housing, this activity requires waiver of certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 act, 24 CFR 902 Subpart B, 24 CFR 966.4, 960.257, 960.259, 24 CFR 5.233 and 5.632 as found in the MTW Agreement Attachment C, Section C, Paragraphs 2, 4 and 11. With respect to HCV, this activity requires waiver of certain provisions of Section 8(o), Section 23 of the 1937 Act and 24 CFR 982.503, 982.516, 982.631, 984, 24 CFR Subpart I, 24 CFR 983 and 24 CFR 5.233 and 5.632 as found in the MTW Agreement Attachment C, Section D, Paragraphs 1, 2 and 5. With respect to the Project-Based Voucher program, this activity requires waiver of certain provisions of Section 8(o)(13)(B and D) of the 1937 Act and 24 CFR 983.101, 983.103, 983.156, 983.207, 983.211, 983.252 and 983.258 as found in the MTW Agreement Attachment C, Section D, Paragraph 7. These waivers are necessary to implement the various provisions of this activity so as to allow LMHA to address the conditions presented by the declared emergencies.

ACTIVITY 2021-03: EVICTION PREVENTION -COVID-19 RELIEF

In view of changing circumstances and needs as a result of the COVID-19 pandemic and to prevent homelessness resulting from evictions, LMHA will work to address the short-term housing needs of low-income renters impacted by COVID-19 related economic dislocation. This local non-traditional activity provides rental subsidies for rent arrearages consistent with PIH Notice 2011-45.

LMHA will allocate approximately \$2 million in MTW funds to the Louisville Metro Office of Housing’s (OH) Eviction Diversion Program for eligible low-income families who are financially impacted by the COVID-19 pandemic. LMHA will enter into an MOU with the OH to qualify families and administer emergency rental arrearage assistance. Specifically, the OH will verify and retain documentation to validate family eligibility for the program as well as retain and provide, upon LMHA request, accounting records to support applicable audit requirements.

Eligible low-income households in LMHA’s jurisdiction may receive rental arrearage assistance for a limited period. Owners may not charge late fees, penalties or fines related to delinquent rent as a condition for receiving the emergency rental assistance. Finally, owners must agree to forgo evictions for assistance tenants for at least 90 days after assistance is provided

As funding is available and where the COVID-19 pandemic exists for a prolonged period of time, LMHA reserves the right to modify the time frame and funding for this activity.

Statutory Objective

This initiative will support the MTW Statutory objective to increase housing choice for low-income families. As many families will face eviction once the COVID-19 eviction moratorium has been lifted, this activity will allow families to remain in their current housing situations by providing financial assistance with rental arrears.

Implementation

LMHA will provide MTW funding for the Eviction Prevention COVID-19 Relief Fund upon approval of this MTW Plan.

Metrics

LMHA will utilize data collected by the OH to analyze the number of households impacted and estimated costs related to this activity.

<i>HC #4: Displacement Prevention</i>				
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	500*		
<i>*This metric represents total planned households served; however, each household served may only be served for a partial year period</i>				

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 as a result of the activity.	0	TBD		
<i>*This metric is not applicable to this activity; however, HUD has required its use. This activity provides support for families to remain in their units and prevent eviction.</i>				
HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	0	500		

Cost Implications

LMHA anticipates the cost of this activity will be up to \$2 million on a one-time basis and has budgeted accordingly.

Authorization Standard: MTW Agreement Attachment D, Broader Uses of Funds. LMHA is seeking Attachment D flexibility in order to provide emergency rental/mortgage assistance to eligible low-income households that are not otherwise permitted under the Housing Choice Voucher and public housing programs established in Sections 8 and 9 of the US Housing Act of 1937.

Rent Reform/Term Limit Information

Not applicable.

IV. Approved MTW Activities

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, 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. 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 2021 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.

Planned Non-Significant Changes

In FY 2021 LMHA will provide additional voucher allocations to existing referral agencies as well as add special referral vouchers to new partner agencies. **Two new allocations of ten vouchers each will be provided to Mattingly Edge and My Chosen People. Mattingly Edge provides housing locations and supportive services for individuals with intellectual and/or physical disabilities who are transitioning out of congregate residential savings. My Chosen People provides mental health treatment, substance abuse treatment, employment search and case management to pregnant women and individuals released from incarceration.**

Planned Changes to Metrics/Data Collection

LMHA updated benchmarks for the following metrics to reflect the additional allocation of **120** vouchers in FY 2021 and updated the universe of the total voucher allocation:

- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households (HHs) Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

These updated metrics assume 100% voucher utilization.

In addition, the benchmark for SS #1: Increase in Household (HH) Income was updated to more closely match actual expected increases in earned income based on currently available tenant income data.

Metrics

<i>CE #1: Agency Cost Savings*</i>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	\$0	\$0		
<i>*Implementation of this activity does not modify any LMHA-completed tasks. Housing Authority staff determines applicant eligibility and performs all certifications.</i>				
<i>CE #2: Staff Time Savings*</i>				

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	0 hours	0 hours		
<i>*Implementation of this activity does not modify any LMHA-completed tasks. Housing Authority staff determines applicant eligibility and performs all certifications.</i>				
CE #4: Increase in Resources Leveraged				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase)	\$0	\$0		
SS #1: Increase in Household (HH) Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of HHs affected by this policy in dollars (increase).	FY 2016: \$4,108	\$8,000		
SS #3: Increase in Positive Outcomes in Employment Status				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Employed Full- Time*	As of FY 2016: 90 (32% of 279 HHs)	361 (47% of 769 HHs)		
Employed Part- Time*				
Enrolled in an Educational Program	As of FY 2018: 2 HHs have full-time adult students	2 HHs have full-time adult students		
Enrolled in Job Training Program	Not tracked	Not tracked		
Unemployed	As of FY 2016*: 189 (68% of 279 HHs)	408 (53% of 769 HHs)		
Other	N/A	N/A		
<i>*LMHA does not track part-time vs. full-time employment.</i>				
SS #4: Households (HHs) Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline*	Benchmark	Outcome	Benchmark Achieved?
# Of HHs receiving TANF assistance (decrease).	FY 2016: 54 (19% of 279 HHs)	146 (19% of 769 HHs)		
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).	As of FY 2016*: 13 (5% of 279 HHs)	39 (5% of 769 HHs)		
<i>* LMHA tracks FSS participation for this metric. The special referral partner may offer additional self-sufficiency services.</i>				
SS #6: Reducing Per Unit Subsidy Costs for Participating Households (HHs)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Housing Choice subsidies per HH affected by this policy in dollars (decrease).	As of FY 2016: \$617	\$617		

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	\$272		
<i>*Rental revenue reflects TTP.</i>				
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 2016: 32 (11% of 279 HHs)	85 (11% of 769 HHs)		
<i>*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).</i>				
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 2016: <1 month	<1 month		

Planned Significant Changes

No significant changes are planned.

Table 11: LMHA Special Referral MTW Voucher Programs FY 2021

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
100K Homes Initiative	N/A	2012	2012; 50 Total: 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; 22 2021: 10 Total: 32	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 100%. This activity has increased housing choices and the cost effectiveness of federal funds. The Center for Women and Families will also provide 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.
Centerstone	Scattered Site Locations	2015	2015; 50 2021: 10	Vouchers are allocated to Centerstone (formerly Seven Counties Services, Inc.). This activity increases housing choices	Full portability upon	No	No: Traditional inspection protocol.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
			Total: 60	<p>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 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.</p>	program completion		
Choices, Inc.	Choices owned units	2014	2014; 4 2016; 1 2019; 1 Total: 6	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.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
ChooseWell Communities	Scattered Site Locations	2016	2016; 10 2017; 60 2021: 10 Total: 80	Vouchers are allocated to ChooseWell Communities' Thrive Program, which assists families that include a pregnant mothers or post-partum motherwho 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. Seventy (70) 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 (Rapid Re-housing)	2012	2012; 10 2013; 10 Total: 20	Vouchers are allocated to Coalition for the Homeless for homeless families with children.	Full portability upon program completion	No	No: Traditional inspection protocol.
Day Spring	Day Spring units	2009	2012; 4 Total: 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 & Children's Place	Scattered Site Locations	2017	2017; 10 Total: 10	Vouchers are allocated to Family & Children's Place for Olmsted-eligible families participating in the	Full portability upon	No	No: Traditional inspection protocol.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				organization's Homeless Prevention Program, which serves families that include at least one individual who is leaving an institution and is also at risk of homelessness. This population includes individuals leaving prison after being paroled or serving out their sentence; individuals who have aged out of foster care; and individuals who have a high rate of hospitalization due to a severe mental illness. Participants receive case management.	program completion		
Family Scholar House	Louisville	2008	2008; 56 Total: 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 Total; 54	Vouchers are allocated to the Family Scholar House and Spalding University at the Downtown Scholar House.			
	Stoddard Johnston	2012	2012; 57 Total: 57	Vouchers are allocated to the Family Scholar House for their Stoddard Johnston Scholar House location.			
	Parkland	2013	2013; 53 Total: 53	Vouchers are allocated to the Family Scholar House at their Parkland Scholar House facility.			
	Riverport	2017	2017; 64 Total: 64	Vouchers are allocated to the Family Scholar House's Riverport Scholar House facility.			

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
	Scattered Site Locations	2021	2021; 10 Total 10	Vouchers are allocated to the Family Scholar House for scattered sites			
House of Ruth	Glade House	2018	2018; 10 Total: 10	<p>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:</p> <ul style="list-style-type: none"> • A safe, drug and alcohol-free community living environment; • Intensive case management; • Group and individual mental health counseling; • Intensive outpatient substance abuse treatment; • Life skills education; and, • Transportation assistance. <p>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.</p>	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.
Kentucky Housing Corporation	Scattered Site Locations	2016	2016; 10 Total: 10	<p>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:</p> <ol style="list-style-type: none"> 1. Persons with serious mental illnesses exiting licensed personal care homes and state psychiatric hospitals 	Full portability upon program completion	No	No: Traditional inspection protocol.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				<ul style="list-style-type: none"> 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 			
Wellspring	Youngland Avenue	2012	2012; 5 Total: 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	No: Traditional inspection protocol.
	Bashford Manor - Newburg	2012	2012; 8 Total: 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; 10 2021: 10 Total: 20	Vouchers are allocated to Wellspring for families with members with severe mental illness who are exiting Wellspring's Ardery House facility for permanent housing. These vouchers are only issued to households that are not eligible for an Olmstead voucher. Wellspring continues to provide case		No	

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
				management / peer specialist services to all clients utilizing these vouchers.			
Louisville Metro Government Office of Resilience and Community Services	Scattered Site Locations	2019	2019; 10 2021; 20 Total: 30	LMHA will allocate vouchers to individuals and families experiencing homelessness participating in employment readiness programming. 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; 10 2021: 10 Total: 20	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 (<i>the Home</i>) 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 Total: 50	LMHA will allocate vouchers to woman recovering from substance abuse disorders and who are pregnant and/or parenting. Specifically, vouchers will be allocated to women participating in the Volunteers of America Mid-States' Transitional Living for Woman program and who meet eligibility requirements in Louisville.	Full portability upon program completion	No	Yes: Inspection with new occupant and once per year concurrently.

Organization	Site	FY Originally Proposed	FY Implemented and # of Vouchers	Description	Portable	Streamlined Admission	MTW Inspections
Catholic Charities of Louisville	Scattered Site Locations	2021	2021; 20 Total: 20	Catholic Charities will provide self-sufficiency and job training programming to two groups: victims of human trafficking and individuals in the Migration and Refugee Services. These two groups are often overlapping.	Full portability upon program completion	No	No: Traditional inspection protocol.
Joshua Community Connectors/ Joshua Tabernacle Missionary Baptist Church	Scattered Site Locations	2021	2021; 20 Total: 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
Mattingly Edge	Scattered	2021	2021; 10 Total 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	2021	2021; 10 Total 10	Voucher 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.	Full portability upon program completion	No	No: Traditional inspection protocol