

*The Housing Authority of the
City of Lincoln, Nebraska*



**MOVING TO WORK
ANNUAL REPORT**

For

Fiscal Year 2011-2012

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This Moving to Work (MTW) Annual Report is prepared in accordance with the “Amended and Restated Moving to Work Agreement” between the Department of Housing and Urban Development and Lincoln Housing Authority. This agreement was signed by both parties in April, 2008 and extends the MTW program until the end of the housing authority’s 2018 Fiscal Year. The required elements of the Annual MTW Report are detailed in HUD Form 50900 published July 24, 2008 (OMB Control Number: 2577-0216 Expiration Date: 8/31/2011).

Cover Photo: www.Urban-Photos.com

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I. Overview

The Lincoln Housing Authority has been a Moving To Work agency since the inception of the demonstration program. From the beginning, we have approached MTW reforms with the idea that some persons may always need to receive a basic level of housing assistance - due to age, disability, low wages or other reasons - and that the varying needs of those persons would be best served by maintaining a simplified income-based rent structure. We also understand that for a great many people, housing assistance can and should be a temporary step to greater self-sufficiency. By encouraging work and individual responsibility, we have achieved a high percentage of working families and a strong voucher turnover rate without implementing arbitrary time limits or unaffordable rent structures. In conjunction with an open waiting list and a strong preference system, this has allowed us to continue to issue new vouchers to many of the neediest persons in Lincoln, Nebraska.

Both the city of Lincoln and the state of Nebraska have continued to benefit from a low unemployment rate. Nebraska's unemployment rate in March 2012 was 4.0% compared to 4.5% in March, 2011, according to the Nebraska Department of Labor. The Lincoln Metropolitan Statistical Area (MSA) had an unemployment rate of 3.7% compared to 4.3% in March, 2011. The Lincoln area had 173,162 non-farm jobs in March 2012 which is 2,069 more jobs than in March 2011. The majority of new jobs have come from education, health, government, and manufacturing. At 4%, Nebraska's unemployment rate continued to be the second lowest in the United States and remains less than half the national rate of 8.2%. The low unemployment rate is a positive sign for Lincoln and continued success of the housing authority's MTW policies.

Lincoln Housing Authority has been acutely aware of the need to expand the supply of affordable housing in our community. However, we have not wanted to do so at the risk of decreasing the number of deep subsidy units available through the Housing Choice Voucher and Public Housing Programs. For that reason, we have continued to use the Voucher and Public Housing funds for their intended purpose and have not used them for additional development. Since the inception of MTW, however, we have been able to leverage non-HUD sources to add 416 additional rental units in five apartment complexes - mostly through the Low Income Housing Tax Credit Program. While these units do not receive deep subsidies, they have expanded the supply of affordable housing available to low and moderate income families and broadened the choice of available units to voucher holders.

The Lincoln Housing Authority has a distinct number of goals and specific objectives that are integral to our success as a Moving To Work housing authority. These goals have been integral to our MTW program since the beginning and will continue to be a focal point for the duration of our MTW agreement.

GOAL I

Increase the number of Section 8 Housing Choice Voucher and Public Housing participants working or making progress towards educational goals, work experience, and self-sufficiency.

GOAL I OBJECTIVES:

- Provide incentives for able-bodied participants to work or seek self-sufficiency through job training or education. Also provide disincentives to able-bodied participants who choose not to work, seek job training, or further education.
- Form community and state partnerships to provide needed programs and services that encourage participation in recognized self-sufficiency programs.

GOAL II

Reduce administrative costs and achieve greater cost effectiveness in federal housing assistance expenditures while ensuring the continued integrity of the program.

GOAL II OBJECTIVES:

- Simplify the operation of the Section 8 Housing Choice Voucher program and the Public Housing program with the purpose of reducing calculation errors, staff review time, and program administrative costs. This also reduces the burden on tenants by requiring fewer meetings and fewer documents to provide for their housing assistance.
- Work with landlords, housing participants, and human service organizations to identify areas of needed change in the operation of the Section 8 Housing Choice Voucher program and the Public Housing program.

GOAL III

Expand the spatial dispersal of assisted rental units and increase housing choices for voucher holders.

GOAL III OBJECTIVES:

- Provide incentives to seek housing opportunities outside areas of low-income concentration.

- Create affordable housing opportunities in growth areas of the community.

NEW AND ONGOING MTW INITIATIVES

For LHAs fiscal year 2011-2012, the housing authority proposed two initiatives contingent on a second amendment to the MTW agreement to obtain authority for a broader use of federal funds. This authority would allow the use of combined MTW funds for purposes outside of Section 8 and 9 activities. HUD approved the second amendment in September, 2011 at which time the housing authority proceeded to use federal funds, effective October 1, 2011, for the Resident Services Program at Crossroads House and the Nebraska RentWise Tenant Education Program.

LHA also proposed two other new initiatives dealing with inspections and project-based assistance. LHA performs all inspections and rent reasonableness determinations regardless of ownership or property management status. LHA also began the process to provide project-based Section 8 assistance at Crossroads House Apartments. A plan to project-base an additional 20 vouchers to serve the disabled was not implemented because the proposed site did not pass the required environmental review.

The housing authority continued to implement the following prior initiatives:

- Rent Reform Initiatives
 - Interim Reexaminations
 - Minimum Rent and 27% TTP
 - Calculation of Annual Income
 - Rent Burden Capped at 50% (voucher only)
 - Average Utility Allowances (voucher only)
- Other Initiatives
 - Income Eligibility
 - Restricted Portability (voucher only)
 - Biennial reexaminations for elderly and disabled households.
 - Housing choice voucher inspection waiver for properties where the annual or initial inspections are without deficiencies.

II. General Housing Authority Operating Information

A. HOUSING STOCK INFORMATION

Number of Public Housing Units At the End of the Year

Lincoln Housing Authority currently has 320 public housing units. There were no changes in the number of public housing units over the past year.

PROJECT	OCCUPIED UNITS	DESCRIPTION
AMP 1		
MAHONEY MANOR	120	Elderly/Near Elderly
AMP 2		
HALL	23	Scattered Site Family
HANSEN	48	Scattered Site Family
LARSON	24	Scattered Site Family
PEDERSON	24	Scattered Site Family
P30	30	Scattered Site Family
AMP 3		
F39	39	Scattered Site Family
A12	12	Scattered Site Family
TOTAL UNITS	320	Public Housing

Description of any significant capital expenditures by development (greater than 30% of the agency's total budgeted capital expenditures during the fiscal year):

Capital Fund Program Grant Year 2009

The second and final phase of bathroom remodeling at Mahoney Manor (AMP 1), a high-rise apartment building for seniors, got underway in January, 2011, and was completed in April, 2011. The remodeling of the last 40 units was funded with Year 2009 (\$35,670.61) and Year 2010 (\$185,659.05) Capital Fund Program Grant dollars under a total contract of \$221,329.66. The work consisted of installing a new shower, toilet, sink, paint and, in some cases, floor tile.

The remaining Capital Fund Program Grant Year 2009 monies were spent on small projects, each

of which were less than 30% of LHA's budgeted capital expenditures for the fiscal year. Although the 2009 Final Capital Fund Performance and Evaluation Report was included in the appendix of LHA's 2012-13 MTW Plan, it is also included in Appendix B of this report for easy reference.

Capital Fund Program Grant Year 2010

LHA received \$520,210.00 in 2010 Capital Fund dollars. In addition to completing the Mahoney Manor bathroom project, 46 % of Capital Fund Program Grant Year 2010 funds were used to install exterior siding and repair sill plates at the Hansen scattered site, single-family houses (AMP 2). The original contract (24 three bedroom units) was for \$172,063.44. The project got underway in January, 2011. After completion of the three bedroom units, LHA had the option of accepting an alternate for the four and five bedroom units at an additional cost of \$7,797.94 per unit. Seven additional units were completed under Phase I. The final Phase I project cost was \$229,375.02.

Phase II of the Hansen Siding project encompassed the remaining 17 units. The initial contract amount was \$132,564.98. Although the work was completed by the end of the fiscal year, this contract amount is expected to change slightly once anticipated change orders are verified. At the end of March, 2012, \$11,693.43 of this contract has been paid out of CFP 2010 monies and \$56,622.46 out of CFP 2011.

All CFP 2010 funds were expended by the end of March, 2012. Due to the need to finish up the Mahoney Manor bathroom and Hansen Siding projects, no 2010 funds were available to install a trash compactor at Mahoney Manor, paint hallways or install new floor coverings in common areas, as originally planned. The Final Performance and Evaluation Report for the 2010 Capital Fund Program Grant Year is included in Appendix B.

Capital Fund Program Grant Year 2011

LHA received \$445,404.00 in 2011 Capital Fund dollars. In addition to completing the Hansen Siding project, CFP 2011 funds are scheduled to be expended on the Mahoney Manor Mechanical Piping Project. The contract is for \$155,765. The project is just getting underway and encompasses the replacement of pipes which circulate water for the building's heating and air conditioning system in the ceiling on the first floor.

Other 2011 Capital Fund monies have been or are currently being expended on small projects, (foundation repair, roof replacement and public housing concrete repairs at scattered sites), each of which were less than 30% of LHA's budgeted capital expenditures for the fiscal year. LHA still hopes to install a new trash compactor at Mahoney Manor, paint the hallways and install new floor coverings in the common areas with the remaining 2011 Capital Fund monies in 2012-13. See 2011 Revised Annual Statement - Revision # 1 in Appendix B.

In order to fulfill HUD'S requirement that housing authorities perform an energy audit of public housing units every five years, LHA contracted with Lincoln Electric System, the city owned utility company, to perform the audit. The audit was done at no charge. The audit was

completed in December, 2011 and forwarded to HUD on March 2, 2012.

Capital Fund Program Grant Year 2012

LHA is receiving \$394,829.00 in 2012 Capital Fund dollars which is a significant reduction in funding. A revised annual statement, reflecting this reduction in funding, can be found in Appendix B. All originally proposed work was retained, but some projects have been scaled back in size to accommodate reduced funding. 2012 Capital Fund dollars are scheduled to be expended on small projects only, each of which are expected to be less than 30% of LHA's budgeted capital expenditures for the fiscal year. They include the replacement of hall lighting, concrete repair and the upgrade of the security system at Mahoney Manor; the repair of concrete and retaining walls at scattered site public housing units; and the repair of decks, foundations, roofs and water taps at the F-39 units. At the end of the current fiscal year, all work is pending environmental clearances and is not yet underway.

Capital Fund Program Five Year Action Plan

The Five Year Action Plan is included in Appendix B.

Description of any new public housing units added during the year by development:

None

Description of any public housing units removed from the inventory during the year by development specifying the justification for the removal:

None

Number of Housing Choice Vouchers At the End of the Year

MTW Vouchers	AUTHORIZED UNITS ON MARCH 31, 2012	DESCRIPTION
Housing Choice Vouchers	2,916	MTW
Non-MTW Vouchers		
Mainstream Housing Opportunities Program	20	Non-MTW
Veterans Affairs Supportive Housing (VASH)	60	Non-MTW
TOTAL VOUCHER UNITS	2,996	MTW & Non-MTW

Note: VASH vouchers are not funded as part of the MTW single fund flexibility. Approval was given on September 21, 2011 to apply certain MTW initiatives to the VASH program. The MTW initiatives were implemented effective December 1, 2011 for VASH vouchers. As of March 31, 2012, seven of the sixty allocated VASH vouchers were not converted to the MTW initiatives. The conversion procedures allowed for VASH participants to delay the conversion to MTW until the next reexamination, if the existing household is negatively impacted by the MTW policies. Typically a negative impact is a tenant rent increase or the elimination of the utility reimbursement. See Appendix C for LHA's request and HUD's approval regarding VASH Vouchers under MTW.

Additional Non-MTW Housing Projects (HUD Subsidized)

Burke Plaza (Section 9 New Construction)	91	(89 under contract)
New 32 (Section 8 New Construction)	32	
Moderate Rehabilitation (Scatter Sites)	10	

Number of HCV units project-based during the Plan year, including description of each separate project:

There were no project-based vouchers during the 2011-2012 Plan year. However, project-based vouchers were proposed and approved for the 2011-2012 plan year.

As described in our 2011-2012 MTW Annual Plan, LHA anticipated awarding 20 Project-Based HCV units through an "other competition" process as described in the project-based regulations. These vouchers were to be tied to a Low Income Tax Credit project whose purpose will be to promote voucher utilization and expand housing choices for persons with disabilities. In April 2011, a project-based application was received from Creekside Apartments that would provide on-site case management services to households with chronic and serious mental illness. Unfortunately the environmental review was unfavorable because these units were located in an 100 year flood plain, thus the application was not accepted. LHA will continue to accept applications through an "other competitive process" to project-base a maximum of 20 units.

The housing authority continues to plan the use of project-based vouchers at Crossroads House Apartments. Crossroads House is a seven story building located at 1000 "O" Street in downtown Lincoln. The residential portion of the building (floors 2-7) provides apartments for seniors age 55 and older. The ground floor is office space. All apartments are one bedroom units. The project is a low income housing tax credit development. The units are now owned by LHA. Currently, 78% of the units are occupied by voucher holders. Converting to project-based voucher will enhance the financial stability of the project and expand housing choice for persons

who are elderly, near elderly, or disabled. Through a contract with the Lincoln Area Agency on Aging, the project now has an ongoing case management and supportive services program. After LHA received HUD approval on the 2011-2012 MTW Annual Plan, LHA sought approval from the Nebraska HUD office to project-base at Crossroads House Apartments before proceeding with establishing a project-base HAP contract at Crossroads House Apartments. The Nebraska HUD office provided written approval in January 2012. A plan is now being created to implement project-based vouchers at Crossroads House Apartments beginning July 1, 2012. The conversion will begin with units occupied by eligible residents who currently do not receive voucher assistance. We expect to have all 58 units converted to project-based vouchers within the next three years.

Overview of Other Housing Owned or Managed

TABLE OF OTHER HOUSING OWNED OR MANAGED

Project	Location	Units	Type
Arnold Heights	Northwest Lincoln and Scattered Locations	468	Affordable Market Rates; Owned by Lincoln Housing Authority.
Lynn Creek	9 th Street and Garber Avenue	16	Affordable Market Rates–Income restricted (<80% of median income); Owned by Lincoln Housing Authority
Northwood Terrace	23 rd and Y Streets	77	Affordable Market Rents–Income restricted (<80% of median income); Owned by Lincoln Housing Authority
Heritage Square	23 rd and W Streets	47	Affordable Market Rents–Income restricted (<80% of median income); Owned by Lincoln Housing Authority
Wood Bridge (LHA)	22 nd Street and Pine Lake Road	17	Affordable Market Rents–Income restricted (<100% of median income); Owned by Lincoln Housing Authority
		17	Below Market Rents–Income restricted (<60% of median); Owned by Lincoln Housing Authority
		----- 34	----- Total Units
Wood Bridge (Limited Partnership)	22 nd Street and Pine Lake Road	48	Tax Credit Project---Income restricted (<60% of median); Managed by Lincoln Housing Authority
		48	Affordable Market Rents–no income restrictions; Managed by Lincoln Housing Authority
		----- 96	----- Total Units

Summer Hill Townhomes	56 th Street and Union Hill Road	20	Tax Credit Project---Income restricted (<60% of median); Managed by Lincoln Housing Authority
		20	Affordable Market Rents—Income restricted (<100% of median income); Managed by Lincoln Housing Authority
		----- 40	Total Units
Summer Hill Apartments	56 th Street and Union Hill Road	48	Affordable Market Rents—Income restricted (<100% of median income); Owned by Lincoln Housing Authority
		48	Below Market Rents—Income Restricted (<60% of median); Owned by Lincoln Housing Authority
		----- 96	Total Units
Crossroads House	1000 “O” Street	58	Tax Credit Project acquired by Lincoln Housing Authority February, 2010---Income restricted (<60% of median).
Burke Plaza	6721 L Street	91	Section 8 New Construction Owned by Lincoln Housing Authority
New 32	Scattered Sites	32	Section 8 New Construction Owned by Lincoln Housing Authority
Prairie Crossing	35 th Street and Yankee Hill Road	33	Affordable Market Rents—Income restricted (<100% of median income); Managed by Lincoln Housing Authority
		43	Tax Credit Project Rents (<60% of median); Managed by Lincoln Housing Authority
		----- 76	Total Units
TOTAL		1,131	Units Owned and/or Managed

Mod. Rehab.	Scattered Sites	10	Moderate Rehabilitation Program
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NARRATIVE DESCRIPTION OF OTHER HOUSING UNITS

Arnold Heights (468 dwelling units)

The Arnold Heights Subdivision is located in northwest Lincoln and consists of two, three, and four-bedroom duplexes and single-family homes built in the late 1950's. The units were acquired by the housing authority from the federal government in 1970 as a purchase of former air-base housing. Lincoln Housing Authority’s ownership represents approximately 47% of the housing in the subdivision. The balance is a mix of owner-occupied and privately-owned rental housing. This project also includes 9 units in scattered locations in other parts of the city. Four

of these units have been occupied by a transitional housing program for women and children who are victims of domestic violence. The program vacated a duplex (two units) on March 31, 2012 and LHA plans to sell this duplex.

Lynn Creek (16 units)

Lynn Creek Apartments are located in the Belmont area at North 9th Street and Garber Avenue. Built in 1994/1995, all units are two bedroom apartments located in one of two brick buildings. Detached garages are available for rent. The Authority purchased Lynn Creek from an estate in 2000.

Northwood Terrace Apartments (77 units)

Located at 23rd and "Y" Streets, Northwood Terrace offers one, two and three bedroom apartments. A coin-operated laundry facility and playground are on site. Built in 1969, the Authority purchased the project from five insurance companies in 1973.

In 1999, LHA converted an apartment and a no-longer-used community space at Northwood Terrace to an early child care facility operated by a non-profit agency. This facility was closed in 2007 due to loss of Early Head Start funding. The housing authority has been unable to find another child care provider for the space. In 2012-2013, LHA's planning and development department will convert this space into a community laundry facility and a one bedroom apartment.

Heritage Square Apartments (47 units)

Located at 23rd and "W" Streets, Heritage Square offers studio, one, two and three bedroom apartments located in one of two secured access buildings with a laundry facility and playground on site. Built in 1972-73, the project was acquired from the U.S. Department of Housing and Urban Development after the previous owners defaulted on the mortgage in 1975.

Wood Bridge Apartments and Townhomes (130 units)

Wood Bridge is located in south Lincoln at South 22nd Street and Pine Lake Road. Built in 1998, the project consists of two bedroom apartments and three bedroom townhomes with full basements and attached garages. The Authority-owned portion of the Wood Bridge project consists of 16 two bedroom apartments and 18 townhomes. The remaining 96 units are owned by a Nebraska limited partnership, Wood Bridge Limited Partnership. The Authority manages all 130 units. The project is a mixed-income development. Half of all units are market rate; the other half are tax credit (reduced rent) units. Detached garages are available for an extra monthly fee.

The Wood Bridge development also includes a clubhouse/leasing office, a laundry/maintenance facility and playground equipment.

Summer Hill Apartments and Townhomes (136 units)

Summer Hill is located in south Lincoln at South 56th Street and Union Hill Road. Built in 2004, Summer Hill consists of 40 three bedroom townhomes with full basements and attached garages. The townhomes are owned by Summer Hill Limited Partnership and managed by

Lincoln Housing Authority. Summer Hill also consists of 96 two bedroom apartments owned and managed by Lincoln Housing Authority. The project is a mixed-income development.

The Summer Hill development also includes a clubhouse/leasing office, a laundry/maintenance facility and playground equipment.

Crossroads House (58 units)

Located in downtown Lincoln at 1000 "O" Street, Crossroads House is a seven-story building in downtown Lincoln. Housing is provided for seniors age 55 and older. All apartments are all one bedroom and are operated as low income housing tax credits units.

Crossroads House is staffed with a half-time resident services specialist who works with residents to provide a variety of educational, social, recreational and support services. Residents who are frail or disabled are eligible for additional support services through a program contract between LHA and the Lincoln Area Agency on Aging which has its main offices across the street from Crossroads House. Participation is optional, not mandatory. Also across the street is the Downtown Senior Center which offers a variety of programs including a senior dining program.

Burke Plaza (91 units)

Located at 6721 "L" Street, Burke Plaza is a seven-story brick building which provides housing for seniors and persons with disabilities. It was built in 1978 and is part of the Section 8 New Construction Program. All units are one bedroom. This project continues to receive funding under the Section 8 New Construction program from HUD; contracts are renewed on an annual basis.

Burke Plaza is staffed with a full time resident services specialist who works with residents to provide a variety of educational, social, recreational and support services. The residents are also served by the Congregate Housing Services Program (CHSP) through a grant from HUD to the Lincoln Area Agency on Aging. The building is also staffed by a full time maintenance repair worker.

New 32 Units (32 units)

Constructed in 1980 under the Section 8 New Construction Program, these units consist of four single family homes and 28 duplexes. The total project consists of 16 two bedroom units and 16 three bedroom units. This project continues to receive funding under the Section 8 New Construction program from HUD; contracts are renewed on an annual basis.

Prairie Crossing Apartments and Townhomes (76 units)

Prairie Crossing is located in south Lincoln at South 33rd Street and Yankee Hill Road. Prairie Crossing is owned by Prairie Crossing Limited Partnership and is managed by Lincoln Housing Authority. Completed in December, 2008, Prairie Crossing is a mixed income development with 20 three-bedroom town homes with attached garage and full basement and 56 apartments (12 one-bedroom and 44 two-bedroom). Eighteen detached garages are available at additional cost. Prairie Crossing features a playground and basketball court. The clubhouse/leasing office has a fitness room, great room, kitchenette and outdoor patio with grill.

Other Properties Owned or Managed

Main Office

Lincoln Housing Authority's central office is located at 5700 R Street, Lincoln, Nebraska. This facility houses the administrative offices as well as offices for project-based and tenant-based housing programs, tenant services, human resources, business and finance, planning and development, and computer and network systems.

LHA Maintenance Facility

The housing authority's primary maintenance facility is located at 4721 N.W. 48th Street. This location houses the maintenance inventory, vehicles, equipment, and staff. The maintenance facility was remodeled and modernized in 2008.

Carol M. Yoakum Family Resource Center

LHA built the Carol M. Yoakum Family Resource Center in Arnold Heights in 1995. The roughly 6,600 square foot facility houses a child care facility (operated by a separate non-profit agency), health clinics, a computer center, food and nutrition programs, adult basic education program, police sub-station and meeting room space available for family support and educational programs. Through staff at the center, LHA also serves as the lead agency for a community learning center program in the nearby elementary (K thru 6) school. The community learning center provides students with academic enrichment opportunities along with activities designed to complement students' regular academic programs. The community learning center also offers a family literacy programs and other activities and programs to strengthen and support families and the neighborhood.

Lincoln Army Air Field Regimental Chapel

Adjacent to the Yoakum Family Resource Center is the Lincoln Army Air Field Regimental Chapel. LHA makes the chapel available for use by the general public.

Crossroads House (commercial)

Lincoln Housing Authority owns commercial office space located on the first floor of Crossroads House, 1000 "O" Street. This was, at one time, an office location for the housing authority but staff were moved to the R Street location to reduce operating expenses. The commercial office space was leased until April, 2012. It is currently vacant and available for lease. The housing authority also owns a two-level parking garage at this location. Monthly parking spaces are rented to the residents of Crossroads House and the general public.

B. LEASE UP INFORMATION

Total Units Leased in the Plan Year

MTW

MTW Public Housing units	320	
MTW Housing Choice Voucher units	2,890	34,679 / 12 = 2,890
MTW Project Based Units	0	

Non-MTW

Non-MTW Housing Choice Voucher units–VASH*	51	613/12 = 51
Non-MTW Housing Choice Voucher units-Mainstream	19	228/12 = 19
Non MTW Section 8 New Construction-elderly	91	89 under contract
Non-MTW Section 8 New Construction-family	32	
Non-MTW Moderate Rehabilitation	10	
Non-MTW Public Housing units	0	

*On September 21, 2011, HUD granted approval for LHA to operate HUD Veterans Affairs Supportive Housing (VASH) program in accordance with the MTW standard agreement and apply some of the MTW initiatives. The funding for the VASH program is not eligible for fungibility and must continue to be accounted for separately in the Voucher Management System.

Description of issues related to leasing of PH or HCV's:

Public Housing:

Fifty-six Public Housing units vacated during the fiscal year, which includes 8 transfers to other Public Housing units at LHA. Of these units, 20 were in Mahoney Manor, an elderly development. This is lower than the last couple of years, and hopefully represents a return to more “normal” turnover of around 15% of units per year. The high turnover in Mahoney Manor over the last few years has led to some greater difficulty filling the vacant units and a higher average unit turn around time. We have been through a multi-year period of capital improvement projects at Mahoney Manor, improving the units but also creating some disruption from the construction. We are hopeful that the improvements and the winding down of construction activity will continue to lead to a slowdown in the turnover in the elderly units.

Mahoney Manor is a highrise building constructed in 1972, and has some market obsolescence

associated with its design. In particular, 63 of the 120 apartments are efficiencies. Many prospective tenants consider the efficiency units too small, and are uncomfortable not having separate bedroom and living areas. The solid, reinforced concrete walls makes combining units unrealistic. For these reasons re-leasing these apartments will continue to be a challenge. In addition the first floor community space, office space and lobby space is insufficient for current and desired uses, and is in need of modernizing. A study of possible improvements to the building, including a redesign and/or additions to the first floor community spaces was undertaken this fiscal year.

As expected turnover at the family units increased this year, after a three year trend of lower turnover. It is reasonable to expect higher family unit turnover after three years of lower turnover, especially if the economy continues to improve. However we also expect continued tightening of the Lincoln rental market and corresponding increases in general rental costs, which could continue to dampen turnover in family Public Housing.

The family Public Housing units consist entirely of single-family and duplex, scattered site homes. They are in generally very good condition and blend-in well with the neighborhoods in which they are located. We anticipate that they will continue to be desirable rental units for families.

Housing Choice Voucher:

During FY 2012, LHA utilized on the average 99.1% of the authorized MTW voucher level and maintained HAP expenses to be within the maximum budget authority. However, VASH and Mainstream vouchers were under-utilized. The VASH vouchers continue to be under-utilized achieving only a 85% utilization rate during FY 2012. VASH voucher utilization did improve by 19% but is still unable to meet the goal of 100% utilization. The two main causes for underutilization is 1) LHA receives an insufficient number of referrals from the Department of Veteran's Affairs (VA), and 2) the attrition rate for VASH vouchers increased. The VA's outreach worker position has been vacant, and this position is responsible to identify the referrals for the VASH program. Fiscal year 2012 the attrition rate was at 20%, but in the last 6 months the attrition rate has averaged almost 40%. The reasons VASH voucher participants end their participation with the program have varied but the most common reasons are due to the veteran moving out of the area or vacating the unit without any notice. In March 2012, LHA worked with the VA to develop a leasing schedule using HUD's forecasting tool to keep the VA aware of the number of referrals require to meet our 100% leasing goal. This tool will be implemented in FY 2013.

Mainstream voucher leasing was at 95% for the year and is currently at 100%.

During FY 2012, our agency admitted 567 new participants to the MTW HCV program which is similar in comparison to last year's new admissions numbers. During FY 2012, the MTW voucher attrition rate increased by 4%, however the HAP cost per unit during FY 2012 remained stable. In February 2012, our utility allowances slightly increased by approximately 6% and contract rents have started to increase. In October 2011, Fair Market Rents slightly

increased by less than a percent (.6%). LHA chose to maintain the same payment standards as established in December 2008. Our payment standards are now 96.8% of the Fair Market Rents. With these costs remaining stable, LHA was able to keep HAP expenditures within the authorized budget while utilizing almost 100% of the authorized vouchers during FY 2012.

Property owner foreclosures remained steady, but it has not had a significant impact on leasing vouchers.

Number of project-based vouchers committed or in use at the end of the Plan year, describe project where any new vouchers are placed (include only vouchers where Agency has issued a letter of commitment in the Plan year):

LHA did not have any project-based vouchers committed or in use during FY 2012.

In April 2011, a project-based application was received from Creekside Apartments that would provide on-site case management services to households with chronic and serious mental illness. Unfortunately the environmental review was unfavorable because these units were located in an 100 year flood plain, thus the application was not accepted.

LHA delayed the implementation of project basing vouchers at our property, Crossroads House Apartments until the HUD state office provided written approval in January 2012.

C. WAITING LIST INFORMATION

Number and characteristics of households on the waiting lists (all housing types) at the end of the Plan year:

Waiting List Data March 31, 2012

INCOME	Public Housing	Housing Choice Voucher
Extremely Low Income	690	4,301
Very Low Income	120	1,054
Low Income	28	0
Total	838	5,355

FAMILY TYPE	Public Housing	Housing Choice Voucher
Families	691	3,398
Elderly Families	37	457
Families with Disabilities	33	661
Single, Non-Disabled	77	839
Total	838	5,355

RACE	Public Housing	Housing Choice Voucher
White	624	3,959
Black/African American	137	934
American Indian/Alaskan Native	20	126
Asian	9	120
Native Hawaiian/Pacific Islander	6	40
Multi-Racial	42	176

Total	838	5,355
ETHNICITY	Public Housing	Housing Choice Voucher
Hispanic/Latino	85	427
Non-Hispanic/Non-Latino	753	4,928
Total	838	5,355

INCOME LEVEL BY BEDROOM SIZE

0 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	0	410
Very Low Income	0	72
Low Income	0	0
1 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	35	1,198
Very Low Income	19	231
Low Income	2	0
2 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	521	1,972
Very Low Income	71	547
Low Income	12	0
3 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	85	617
Very Low Income	16	176
Low Income	11	0

4 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	35	89
Very Low Income	13	26
Low Income	2	0
5 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	14	15
Very Low Income	1	2
Low Income	1	0
6 Bedroom	Public Housing	Housing Choice Voucher
Extremely Low Income	NA	0
Very Low Income	NA	0
Low Income	NA	0
TOTAL FOR ALL BEDROOM SIZES	Public Housing	Housing Choice Vouchers
	838	5,355

Description of waiting lists (site-based, community-wide, HCV, merged) and any changes that were made in the past year:

Housing Choice Voucher

The Housing Choice Voucher waiting list continues to grow as the demand for housing assistance increases. The voucher waiting list experienced only a 4.2% increase to 5,477 households, in comparison to a 66 % increase in FY 2011.

After changing the preference in January 2009 to a weighted preference system and adding a preference for applicants who completed a 12 hour tenant education course called Nebraska RentWise, the dynamics the HCV waiting list continues to change. The HCV applicants and participants are better educated renters because of the Nebraska RentWise preference. In Fiscal Year 2012, fifty-three percent (53%) of the applicants selected from the HCV waiting list have successfully graduated from the Nebraska RentWise program. Since June 2010, the HCV waiting list has had almost 100 applicants each month who qualify for a preference. Thus “non-preference” applicants are not being selected from the waiting list. LHA is no longer able to provide non-preference applicants with an estimated wait time. On February 1, 2011, a

preference policy change was implemented limiting a former voucher participant from utilizing a LHA preference more than once in a five-year period after ending their HCV program participation. This policy change was established to decrease the recidivism of preference usage. The policy change limiting preferences has been widely accepted and LHA has not received much feedback.

Public Housing

LHA maintains two waiting lists for Public Housing, one for Mahoney Manor, an elderly development, and one for our scattered-site family units. The lists are separated by bedroom size. We did not make any significant changes in the operation of our Public Housing waiting lists or preferences this year. All LHA waiting lists are always open. The number of applicants on the Public Housing lists has held fairly steady.

The increase in family unit turnover this year resulted in more unit offers and waiting list purges, which caused the waiting time to decrease somewhat from the previous year. Generally, only applicants with preferences are getting housed. The most prevalent preference is the working preference. Families who work at least 25 hours per week or are disabled qualify for the working preference. The wait for applicants with preferences is 2 to 4 months for a three bedroom unit, and 3 to 6 months for a 2 bedroom unit.

III. Non-MTW Related Housing Authority Information (Optional)

A. List planned versus actual sources and uses of other HUD or other Federal Funds (excluding Hope VI):

B: Description of non-MTW activities implemented by the Agency.

The above section is optional and Lincoln Housing Authority chose not to submit the information in this annual report.

IV. Long-term MTW Plan (Optional)

The Lincoln Housing Authority has participated in the HUD Moving To Work Demonstration program since 1999. Lincoln's Moving To Work program has concentrated its efforts in the following long-term operational vision for the MTW program.

- Retain program flexibility to meet the many changes encountered in program funding, local housing market conditions, and the needs of the families and individuals participating in Lincoln's Moving To Work program.
- Continue to seek ways to simplify and streamline the Section 8 Housing Choice Voucher program and Public Housing programs while protecting the integrity of the program and accepting accountability for administrative requirements. The Section 8 Housing Choice Voucher program is needlessly complicated for participants, landlords, and implementing staff. The complexity of the system results in several areas where errors occur with substantial frequency. Tenants are confused about deductions allowed and disallowed and how their portion of rent is determined. Landlords are frustrated by the amount of paperwork and complex rules and regulations that the landlord must follow to be paid. The complexity is limiting needed landlord participation. Lack of housing choices results when landlords refuse to participate.
- Continue to promote opportunities for tenant self-sufficiency either through education or meaningful work experience. The need for lower-income participants to complete their education and expand their work experiences will provide a solid base for continued success in their personal and family development.
- Continue the various community partnerships required to enhance participant opportunities in expanding family support services such as social services, education, transportation, and health care programs.

V. Proposed MTW Activities: HUD approval requested

A. Describe any activities that were proposed in the Plan, approved by HUD, but not implemented, and discuss why these activities were not implemented:

As per instructions, all proposed activities that were approved and implemented for the Plan year are reported in Section VI as “Ongoing MTW Activities”.

VI. Ongoing MTW Activities: HUD approval previously granted

INTRODUCTION

This MTW Annual Report is Lincoln Housing Authority's third annual report under the 2008 Amended and Restated Moving to Work Agreement.

Contents of this Section:

Rent Reform Initiatives		
Number	Description	Statutory Objective
Rent Reform 1	Interim R-examinations	-Cost Effectiveness -Self-Sufficiency
Rent Reform 2	Calculation of Annual Income	-Cost Effectiveness -Self-Sufficiency
Rent Reform 3	Rent Calculations	-Cost Effectiveness
Rent Reform 4	Rent Burden	-Housing Choice
Rent Reform 5	Average Utility Allowances	-Cost Effectiveness
Other Initiatives		
Initiative 1	Income Eligibility	-Cost Effectiveness
Initiative 2	Restricted Portability	-Cost Effectiveness
Initiative 3	Biennial Re-Examinations	-Cost Effectiveness
Initiative 4	HQS Inspections Waiver	-Cost Effectiveness
Initiative 5	Inspections and Rent Reasonableness Determinations	-Cost Effectiveness
Initiative 6	Project-Based Section 8 Units	-Housing Choice
Initiative 7	Nebraska RentWise Tenant Education	-Housing Choice
Initiative 8	Resident Services Program	-Housing Choice -Cost Effectiveness

RENT REFORM INITIATIVES

Rent Reform 1

A. ACTIVITY: INTERIM RE-EXAMINATIONS

Interim Reexaminations (HCV & PH Programs)

Year Identified: April 1, 1999

Effective Date: July 1, 1999

Statutory Objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures
- Give incentives to obtain employment and become economically self-sufficient

Lincoln Housing Authority has continued the following policy for interim re-examinations. It should be noted that the policy on income increases does not require an MTW waiver. The section on income decreases, specifically the 90 day period for a rent adjustment, likely requires MTW flexibility. This interim policy affects households who have reduced or terminated employment. It delays rent decreases for 90 days after the decrease in income occurred or after all verifications are received. HUD regulation at 24 CFR 982.516(b)(2) and (3) states "The PHA must make the interim determination within a reasonable time after the family request. Interim examinations must be conducted in accordance with policies in the PHA administrative plan". However, the Housing Choice Voucher guidebook on page 12-10 defines "reasonable time" as the first day of the month following the date of the reported change.

We chose to list the policies together. When LHA initially began the MTW program, the policy on income increases was part of our MTW plan as a way to encourage and reward households for increasing income such as through new employment.

Income increase: If the family's income increases without a change in family composition, then LHA will wait until the annual re-examination to re-determine any possible rent increase. Families who report zero income will be required to report income changes at their quarterly certification and rents will be changed accordingly.

Income decrease: LHA will not lower rent for payments due to a temporary loss of income of one month (30 days) or less duration. If a family member has reduced or terminated employment income, LHA will make the rent decrease 90 days after the decrease in income occurred or after all verifications are received to redetermine eligibility, whichever is the latest. Families who terminate their employment for good cause will be eligible for an immediate interim review and rent decrease, if applicable. Good cause will include lay-off, reduction in force, accident, injury,

or illness which precludes work. In consideration of hardship, families will be exempt from this 90 day delay if they meet one of the exemptions for the Minimum Earned Income (MEI) requirement shown later in this report.

B. BENCHMARKS, METRICS, AND IMPACT

LHA proposed and implemented this policy at the onset of its MTW program as an employment incentive to families. As families increased their income, they were not subject to an immediate re-examination of income and assets and the corresponding rent increase. The Quality Housing and Work Responsibility Act (QHWRA) of 1998 adopted this same initiative. Since the policies regarding income increases are not part of our MTW waivers, we are not collecting any data on this part of the activity.

The housing authority has continued to implement the policies on rent reduction due to decreased income. These policies encourage families to retain employment as well as to make it a priority to seek new employment when job losses occur. We believe this initiative has encouraged families to seek new employment without contacting the housing authority for a rent adjustment or to report job losses.

The benchmark for this initiative was to achieve 50% of the households with a job change achieving no rent decrease. This would represent an effective policy inasmuch as it will show people retaining their employment or being incentivized to seek new employment because a rent decrease was not forthcoming.

We use a point in time system for data collection. Using a point in time system has proven easier for staff to remember and for management to monitor the data collection progress. For this plan year, we used the month of November 2011.

METRIC	BASELINE	BENCHMARK	OUTCOME
Reported job loss or job change	Annual and Interim Reviews Effective 11/1/2010	Percentage of the job changes which did not result in a rent decrease	Annual and Interim Reviews Effective 11/1/2011
Total number of job losses or job changes	76		33
Number job losses or job changes requiring a rent decrease	15		4
Number of job losses or job changes which did not result in a rent decrease	61		29
Percent with no rent decrease	80%	50% or more	88%

Hardships: Of the 4 who required rent decreases, 1 received an immediate hardship rent reduction for good cause. Three received a rent reduction after a 90 day delay.

We see fewer rent decreases following a job loss or job change because families who become unemployed are encouraged to seek and obtain new employment. As shown above, 88% did not have a rent reduction indicating they obtained new employment.

C. CHALLENGES AND NEW STRATEGIES

Strategies

Last year, we determined a better metric for this initiative is tracking the number of job changes instead of number of households. Some households have multiple job changes throughout the year and any one of which could result in a request for a rent decrease (interim review). This change was implemented.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

We plan to continue HUD's suggestion to randomly select a point in time to collect data. As noted above, we determined a better metric for this initiative is tracking the number of job changes instead of households. Some households have multiple job changes throughout the year and any one of which could result in an interim review. Families who become unemployed are encouraged to seek and obtain new employment. No rent reduction indicates they obtained new employment.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.11. Rent Polices and Term Limits. Under this section, the housing authority is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The housing authority is also authorized to adopt and implement any reasonable polices for setting rents in public housing. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the a1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 6.632, 5.634 and 960.255 and 966 Subpart A.

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.2. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated requirements. This authorization waives certain provisions of Section 8(o)(1), 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.

Rent Reform 2

A. ACTIVITY: CALCULATION OF ANNUAL INCOME

This activity is really a package of initiatives (A. - D.) related to how we calculate annual income and rent. These combine together to not only encourage self-sufficiency but also achieve administrative efficiencies.

Calculation of Annual Income (HCV & PH Programs)

Year Identified: April 1, 1999
Effective Date for A and D: July 1, 1999

Year Identified: November, 2007
Effective Date for B and C: April 1, 2008 (new admissions and transfers)
July 1, 2008 (annual re-examinations)

Statutory Objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures
- Give incentives to obtain employment and become economically self-sufficient

A. Minimum Earned Income

LHA will include a minimum amount of earned income when calculating Annual Income whether or not a family is working. The minimum amount of earned income for families with one eligible adult will be based on 25 hours per week of employment at the federal minimum wage. The minimum amount of earned income for families with two or more eligible adult members will be based on 40 hours per week of employment at minimum wage. LHA will count the higher of the Minimum Earned Income (MEI) or the actual earned income for the household. The minimum earned income will be added to any unearned income the family receives. Eligible adults are persons 18 years of age or older who do not qualify for an exemption from the MEI. All adults in the household must be exempt in order for the household to be exempt from the minimum earned income requirements. LHA has eight categories of exemptions such as illness, elderly or disabled, students, caretakers, and participants in approved self-sufficiency programs.

B. Calculation of Asset Income

For households with total assets for which the face value is equal to or greater than \$5,000, asset income will be based on the HUD passbook rate multiplied by the face value. Verification requirements are modified to allow as first level of acceptable verification the household provided documents such as quarterly or end of year statements.

For assets under \$5,000 in face value, first acceptable verification level is self-certification of face value and income. The income will be excluded if total assets are under \$5,000.

C. Verifications

LHA will utilize Enterprise Income Verification (EIV) as the first level of acceptable verification. In lieu of third party verifications, tenant provided documents would be second level of acceptable verifications for the following situations:

Earned Income: three months pay statements (pay stubs)

Social Security Income: the last Social Security Statement issued to the household by the Social Security Administration.

D. Other

LHA will not implement regulatory provisions related to Earned Income Disregard income exclusions, imputed welfare income, and student earned income exclusions for adults 22 and older.

B. BENCHMARKS, METRICS, AND IMPACT

A. Minimum Earned Income

LHA views the Minimum Earned Income (MEI) as one of the flagship initiatives of our MTW program. MEI promotes and encourages employment by implementing a work requirement. The requirement lays out the basic expectation that a work-able adult should work at least 25 hours per week at minimum wage. The beauty of MEI is that it allows the family the flexibility of figuring out how to meet the rent generated by MEI, rather than a strict requirement to work a certain number of hours at a job. In that sense, MEI acts similar to a minimum rent. It is not strictly a minimum rent, because families can have other sources of income besides MEI that are included in the rent calculation with MEI, or can be exempt from MEI. In addition, because the rent calculation is based on an expected level of earned income, each income review with a family involves a conversation about work and the expectation to work. This was a major change in focus from our previous communication with tenants - from just calculating the numbers to discussing work as a basic expectation.

Since implementing the MEI policy in 1999, it has gradually changed due to increases in minimum wage. The original MEI was based on a minimum wage of \$5.15 per hour. The following chart shows the changes in MEI over time.

Effective Date	Minimum Wage	MEI for 1 person	MEI for 2 persons
July 1, 1999 (start of MTW)	\$5.15	\$6,698	\$10,712
July 24, 2007	\$5.85	\$7,605	\$12,168
July 24, 2008	\$6.55	\$8,515	\$13,624
July 24, 2009	\$7.25	\$9,425	\$15,080

The maximum amount of the MEI for a household is shown above. Actual MEI is reduced by the amount of earned income for the household. Where the chart shows 1 or 2 persons, it is referring to the number of adults who are “eligible to work” or “work-able” meaning they do not have one of the exemptions from MEI. If there is a household with 2 adults but one is exempt, then the column labeled “MEI for 1 person” is used.

Data for the MEI initiative shows that at the end of FY 2011-2012, there were 522 households who had MEI with 34 in public housing and 488 in the housing choice voucher program. Note, however, that the amount of income added to each of these MEI households may be anywhere from \$1.00 to the maximum \$15,080 for a household with two adults and no exemptions and no earned income. The Total Tenant Payment for a household with two adults at the maximum MEI would be \$339.00.

Exemptions for Hardship

Within this initiative, LHA offers an extensive list of exemptions to prevent hardship. The exemptions are the hardship policy and are described below and in our policies; the vast majority of households are exempt from the MEI policy. At the end of the fiscal year, we calculated 160 public housing households and 1,502 housing choice voucher households who had one or more exemptions from MEI and thus benefitted from this hardship policy. When a household requests relief under this initiative, they are directed to the array of exemptions that are available. For those households who have been on MEI and are no longer, the following data shows important outcomes. Note that in the past fiscal year, 40% of the households ended their MEI requirement by entering employment while 26% entered a self-sufficiency program or education program.

MEI is shown to promote and encourage employment through the outcomes for households ending the MEI requirement. Along with employment, we also see education or participation in a self-sufficiency program as a positive steps toward future employment. One benchmark for this initiative is the percentage of households who end their MEI requirement through employment or participation in education or a self-sufficiency program. In this regard, we have combined these into one benchmark of 50% as shown in the table below. This outcome is a good indicator that the MEI requirement encourages people toward employment or toward education and training leading to employment.

METRIC	BASELINE	BENCHMARK	OUTCOME
Outcomes for Households Ending the MEI Requirement	April 1, 2009 to March 31, 2010	Percentage of households ending MEI who enter employment, education, or a self-sufficiency program	April 1, 2011 to March 31, 2012

EMPLOYMENT, EDUCATION AND SELF-SUFFICIENCY OUTCOMES			
*Employment—person has entered employment	27%		40%
*Self-sufficiency—person is a participant in an approved self-sufficiency program	18%		16%
Education—person is a full-time student	14%		10%
*TOTAL OF THE OUTCOMES ABOVE	59%		50% or more
OTHER OUTCOMES			
Elderly-Disabled—person has become disabled or is age 62	6%		3%
Caretaker—person is a caretaker of an ill or incapacitated family member	0%		0%
Medical—person has temporary illness or injury preventing employment or pregnancy	4%		1%
Moved—the family member subject to MEI has moved out of household	2%		3%
Terminated----the family has terminated their public housing lease or voucher participation	29%		27%
TOTAL OF THE SIX OUTCOMES ABOVE	41%		50% or less

Our data in the table below shows that 3 public housing MEI household and 96 voucher MEI households terminated their assistance during the fiscal year. This was 6.3% of all public housing terminations and 16.7% of all voucher terminations.

MEI households made up 15.9% of total voucher households and 10.6% of public housing

households at the end of the fiscal year. This data shows there is not a disproportionate number of households with MEI who terminate assistance compared to other households who terminate assistance.

METRIC	BASELINE (Revise)*	BENCHMARK	OUTCOME
Comparison of MEI households terminated from public housing and housing choice vouchers in proportion to non-MEI households	April 1, 2010 to March 31, 2011	MEI households will have an equal or lower percentage of terminations relative to the proportion of MEI households to total households	April 1, 2011 to March 31, 2012
Number\Percent of MEI households (year end)	HCV: 466 out of 2,918 16.0% PH: 28 out of 320 8.8%		HCV: 474 out of 2,982 15.9% PH: 34 out of 320 10.6%
Number\Percent of MEI households terminating (year end)	HCV: 90 MEI households out of 500 terminations 18.0% PH: 1 MEI household out of 54 terminations 2%		HCV: 96 MEI households out of 576 terminations 16.7% PH: 3 MEI households out of 48 terminations 6.3%
MEI households terminate at a lower rate than their overall percentage of public housing units or vouchers	HCV: 18.0% PH: 2%	HCV: Less than 15.9% PH: Less than 10.6%	HCV: 16.7% PH: 6.3%

For MEI households who terminated their public housing lease or ended voucher participation, the

following table shows the reasons for termination during the period of April 1, 2011 to March 31, 2012:

METRIC	REVISED* BASELINE HCV	REVISED* BASELINE PH	OUTCOME HCV	OUTCOME PH
Public Housing and Housing Choice Vouchers: Number of terminated MEI households and Reason for Termination	April 1, 2010 to March 31, 2011 Revised Baseline*		April 1, 2011 to March 31, 2012	
Criminal Activity	4	0	4	0
Deceased	0	0	0	0
Drug Activity	5	0	6	0
Vacate Owing	0	0	0	0
Fraud	5	0	7	0
Owner HQS Defect	0	0	1	0
Tenant HQS Defect	1	0	1	0
Other Program Violation	12	0	6	0
Moved out of town	1	0	1	1
Portable Absorbed by HA	1	0	2	0
Moved in with Relative/Friend	0	0	1	0
No Reply to Annual Re-exam	4	0	6	0
No longer Requires Assistance	15	0	20	0
Reason Unknown	0	1	0	0
Moved to Nursing Home	0	0	0	0
Vacate without Notice	21	0	17	0
Transfer to Other LHA Unit	0	0	0	0
Buying a House	2	0	2	0
Eviction—Non Payment of Rent	14	0	13	1

Eviction—Other Lease Violation	0	0	1	0
Voucher Expired	5	0	8	0
Moved to Other Assisted Housing	0	0	0	1
TOTAL MEI TERMINATIONS	90	1	96	3
TOTAL TERMINATIONS	500	54	576	48

*Note: In the report for 2010-2011, we noted improved data collection which showed a higher number of MEI terminations. After further consideration, we determined the data for 2010-2011 was more appropriate to use as the baseline level for comparison in future years.

Further data on the positive effect of the MEI requirement is the total number of households with wages. The data clearly shows a high percentage of households with wages, another indication that our program emphasis on work expectations is successful.

METRIC	BASELINE	BENCHMARK	OUTCOME
Household Employment Information (Average Monthly Data)	April 1, 2009 to March 31, 2010	Percentage of non-elderly or non-disabled households with income from wages	April 1, 2011 to March 31, 2012
Public Housing	134 out of 168 households 80%	80% or greater	126 out of 158 households 80%
Housing Choice Voucher	891 out of 1,486 households 60%	60% or greater	1,006 out of 1,542 households 65%

Our outcome for public housing was at benchmark while the voucher result was above benchmark. Voucher admissions stabilized and the overall economy has improved. Our MTW employment requirements are effective in this environment.

B. Calculation of Asset Income

Part B of this activity is concerned with calculation of asset income. Our data is based on a snapshot taken at the end of the fiscal year.

MTW Households with Zero Assets declared		
	Households	Units/Vouchers
Public Housing	39	12%
Housing Choice Voucher	928	31.3%

MTW Households with Assets between \$1 and \$4,999:		
Public Housing	231	72%
Housing Choice Voucher	1,968	66.4%
MTW Households with Assets equal to or above \$5,000:		
Public Housing	50	16%
Housing Choice Voucher	70	2.3%

During this fiscal year, it has been estimated that Lincoln Housing Authority saved the following minimum administrative costs by modifying the asset verification policy under the Moving to Work Agreement:

METRIC	BASELINE	BENCHMARK	OUTCOME
Administrative Cost Savings from MTW Asset Initiative	April 1, 2009 to March 31, 2010 Number of Individual Assets @ \$7.50 per verification	Annual Cost Savings	April 1, 2011 to March 31, 2012 Number of Individual Assets @ \$7.50 per verification
Public Housing	499 @ \$7.50 each \$3,743	>\$3,700	638 @ \$7.50 each \$4,785
Housing Choice Voucher	3,147 @ \$7.50 each \$23,603	>\$23,600	3,874 @ \$7.50 each \$29,055

Note: Cost savings are based on only one third party verification request per asset and includes staff time, postage and supplies. Cost savings have not been adjusted for inflation. Past experience and current experience with non-MTW programs shows that often more than one attempt to verify assets is required to successfully obtain third-party asset verifications. As such, these are only minimum cost savings estimates based on one attempt. Actual costs savings are most likely to be substantially greater.

Improved Program Accuracy

In January 2004 at a Public Housing Rental Integrity Summit, asset values and asset income verifications were reported to be problem areas in rent calculations as identified by HUD’s Office of Policy Development and Research (PD &R). During this past fiscal year, our non- MTW Section 8 New Construction program received notice of “finding” on an asset income calculation error after an audit was conducted by a third party Contract Administrator. Lincoln Housing Authority spent a significant amount of staff time attempting to resolve the difference in asset income as perceived by the auditor and LHA. The auditor required LHA to burden the tenant with obtaining six months of bank statements. The end result of resolving the discrepancy was a significant amount of administrative time used and the tenant was stressed and inconvenienced over an asset discrepancy that had absolutely no impact on the final tenant rent calculation.

Based on this fiscal year’s internal audits, our *simplified* MTW asset verification and calculation policy appears to have improved our accuracy on asset determinations, asset income policy application and rental calculations by 2.1%. It is also a significant factor in our administrative time savings reported elsewhere in this report. Due to time savings in our MTW process, we were able to increase staff training and accuracy for the unnecessarily complicated non-MTW programs which then shows a 1.1% increase in accuracy percentage.

METRIC	BASELINE	BENCHMARK	OUTCOME
Asset Accuracy in Program Eligibility Determinations	Internal Audits April 1, 2009 to March 31, 2010	Percentage Compliance with Asset Program Rules	Internal Audits April 1, 2011 to March 31, 2012
MTW Public Housing and Housing Choice Vouchers	3 errors out of 679 audits 99.6% compliance		3 errors out of 820 audits 99.6% compliance
Non MTW Section 8 New Construction and Non-MTW Vouchers	4 errors out of 112 audits		4 errors out of 157 audits
	96.4% compliance with asset program rules		97.5% compliance with asset program rules
Outcome Comparison	3.2% better compliance with asset program rules by MTW compared to non-MTW	3% or better compliance with asset program rules by MTW compared to non-MTW	2.1% better compliance with asset program rules by MTW compared to non-MTW

The following chart shows the estimated impact of this initiative in March of 2008. Since we no longer gather verifications on “actual” asset income, we are unable to compare actual asset income to imputed asset income. With interest rates remaining extremely low and investment

income remaining sluggish, it is probable that the actual income for current household assets is much lower than determined in March 2008. The asset imputed rate was reduced to zero percent by the HUD Regional office. This means cost of this initiative is much lower than anticipated. The following charts are presented for informational purposes.

Public Housing	March 2008	April 2009	April 2010	April 2011	April 2012
Number of Assets Below \$5,000	473	443	413	588	270
Number of Assets equal to or above \$5,000	111	90	90	79	50
Total Value of assets under \$5,000	\$414,972	\$331,482	\$293,184	\$366,530	\$165,344
Total Value of assets over \$5,000	\$2,601,712	\$2,251,716	\$2,198,123	\$2,066,904	\$2,912,889
Income @ 2%	\$52,034	\$45,034	\$43,962	\$41,338	\$58,258*
Actual income from assets	\$82,850	Not Available	Not Available	Not Available	Not Available
Rent Subsidy increase Cost of Initiative	\$30,816 @ 30% = \$9,244.80				

*The asset imputed rate was reduced to zero percent by the HUD Regional office. This means cost of this initiative is much lower than anticipated.

Housing Choice Voucher	March 2008	April 2009	April 2010	April 2011	April 2012
Number of Assets Below \$5,000	3,137	2,856	3,031	3,357	2,141
Number of Assets equal to or above \$5,000	113	109	116	112	70
Total Value of assets under \$5,000	\$1,324,389	\$1,047,108	\$1,144,055	\$1,230,438	\$914,059
Total Value of assets over \$5,000	\$2,263,794	\$2,274,475	\$2,315,492	\$2,325,018	\$1,767,785
Income @ 2%	\$45,275	\$45,490	\$46,310	\$46,500	\$35,356*

Actual income from assets	\$75,691	Not Available	Not Available	Not Available	Not Available
Rent Subsidy increase Cost of Initiative	\$30,416 @ 30% = \$9,124.80				

*The asset imputed rate was reduced to zero percent by the HUD Regional office. This means cost of this initiative is much lower than anticipated.

C. Verifications

Part C of this activity is concerned with documents to verify earned income and Social Security income. It allows for tenant-provided documents in lieu of direct written third party verifications. No data was tracked on these two specific issues. However, these issues have an impact on indirect staff time and overall postage costs, both of which are reported elsewhere in this MTW Annual Report. HUD has since redefined third party verifications to incorporate some of this initiative.

D. Other

Student Income for dependents 22 years of age or older

For Part D of this activity, we collected data on the number of students age 22 and older whose income under the non-MTW policy would have been excluded from the rent calculation. The following table shows the number of students age 22 and older whose income was counted.

Number of full-time students age 22 and older whose Income was included	Number of households with dependents who are age 22 or older and full-time students
2 - Public Housing	2 - Public Housing
2- Housing Choice Voucher	8 - Housing Choice Voucher

\$ 10,752 Public Housing total earned income counted

\$ 4,894 Housing Choice Voucher total earned income counted

\$ 15, 646 Total Earned Income used in rent calculations for PH and HCV

This activity was chosen because of a public perception that earned income of all dependent adults should be used to offset housing subsidy costs. This MTW activity continues to have an insignificant impact on rent subsidy since a total of only four (4) dependent, full-time student, age 22 or older is participating in the MTW Public Housing or the Housing Choice Voucher program with earned income. The total earned income used in rent calculations for this one household was \$15,646. However, this MTW activity and data collection helps improve the public perception on providing housing subsidy to households with adult dependent students.

C. CHALLENGES AND NEW STRATEGIES

A. Minimum Earned Income

Challenges for MEI Data Collection:

We have continued to emphasize data collection for this initiative to improve accuracy of data on reasons for leaving MEI. MEI data collection is “work intensive” and maintained in a separate database. We continue to work on methods to prompt staff on MEI data collection among the hundreds of other steps they also perform with an annual review, interim review or termination. Our housing software vendor is working on a major upgrade which may provide capacity to add fields for tracking select MTW data.

B. Calculation of Asset Income

Challenges: Calculation and Verification of Asset Income

Since we no longer gather verifications on “actual” asset income, we are unable to compare actual asset income to imputed asset income. We have discontinued monitoring this data.

For 2012-2013, our control group size is reduced because VASH is now participating in MTW activities as reported elsewhere in this report

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable.

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.11. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies for setting rents in public housing including establishing the definitions of income and adjusted income. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 6.632, 5.634 and 960.255 and 966 Subpart A.

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.2. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated requirements. This authorization waives certain provisions of Section 8(o)(1), 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.

Rent Reform 3

A. ACTIVITY: RENT CALCULATIONS

Minimum Rent and 27% TTP (HCV & PH Programs)

Year Identified: November, 2007

Effective Date: April 1, 2008 (new admissions and transfers)
July 1, 2008 (annual reexaminations)

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

1. Total Tenant Payment (TTP) is determined on 27% of gross income with no allowable deductions.
2. All subsidized households are responsible to pay the owner a minimum of \$25.00 for tenant rent. The higher of the TTP minus the utility allowance or \$25.00 is used to determine the tenant rent to the owner. This requirement is waived if the head of household is disabled and has a current Social Security application pending.

B. BENCHMARKS, METRICS, AND IMPACT

This initiative provides a much simpler method of calculating housing assistance for households served by LHA. The result is a savings in staff time, reduced calculation errors, and a rent calculation system that is easier for tenants to understand. The decision to use 27% of gross income for the TTP was based on our goal to continue to serve the same number of households. The minimum rent (\$25.00) is intended to create a minimum level of tenant financial responsibility and obligation to the landlord.

Savings in staff time is measured primarily through comparison of a control group (regular HUD rent calculations) and an MTW group. The control group is made up of tenants in two Section 8 New Construction Projects (Burke Plaza and New 32) and two special voucher programs (Veterans Affairs Supportive Housing (VASH) and Mainstream vouchers). The control groups are compared to a random sample of MTW participants in public housing and housing choice voucher programs. Staff time is tracked by the number of direct and indirect contacts and the amount of time for each contact. Direct contact involves a face to face client contact; indirect is client specific activities outside of face to face contact.

Annual Re-Examinations and New Admissions

The table below shows the aggregate results of tracking administrative time for new admissions and annual re-examinations. The table compares administrative time in MTW and non-MTW programs. The tables show significant administrative time savings from this initiative. However, we did uncover some variables that impact the time savings results. For example, when

comparing annual reviews for Burke Plaza (Section 8 New Construction) with Mahoney Manor (Public Housing), we expected Mahoney Manor to have fewer average minutes when, in fact, Burke Plaza had fewer minutes. These deviations from expectations were a concern, but we found that variation in experience and skill levels of staff had a significant impact.

Move-In Average Administrative Time (in minutes)	April 1, 2009 to March 31, 2010	April 1, 2011 to March 31, 2012
NON-MTW GROUPS		
VASH Vouchers	88* *includes Mainstream	200* *VASH only
Mainstream Vouchers	included above with VASH	217* *Mainstream only
Section 8 New Construction (family)	322	397
Burke Plaza (elderly/disabled)	449	697
Non MTW: Unweighted Average	286	378
MTW GROUPS		
Public Housing (family)	214	222
Mahoney Manor Public Housing (elderly/disabled)	330	399
Housing Choice Voucher	147	171
VASH under MTW		147
MTW: Unweighted Average	230	235

Annual Re-Examination Average Administrative Time (in minutes)	April 1, 2009 to March 31, 2010	April 1, 2011 to March 31, 2012
NON-MTW GROUPS		
VASH Vouchers	100* *includes Mainstream	152
Mainstream Vouchers	included above with VASH	125

Section 8 New Construction (family)	55	96
Burke Plaza (elderly/disabled)	65	78
Non MTW: Unweighted Average	73	113
MTW GROUPS		
Public Housing (family)	50	70
Mahoney Manor Public Housing (elderly/disabled)	71	113
Housing Choice Voucher	79	88
VASH under MTW		74
MTW: Unweighted Average	67	86

Drilling down further in our data, we isolated the data for individual staff persons who had both MTW and non-MTW caseloads. By comparing MTW and non-MTW work of an individual staff person, we were able to achieve a more accurate measurement of the impact. When analyzing data in this way, we could identify approximately 30% time savings in program administration for the Public Housing and Housing Choice Voucher programs using our MTW rent structure. The following table illustrates this analysis for housing specialists who had both MTW and non-MTW caseloads.

METRIC	BASELINE	BENCHMARK	OUTCOME
Comparison of MTW and Non-MTW Administrative Time	April 1, 2009 to March 31, 2010 Average Minutes for Activity and Percent of Time Saved under MTW	Average Percent of Administrative Time Saved under MTW	April 1, 2011 to March 31, 2012 Average Minutes for Activity and Percent of Time Saved under MTW
<u>Staff #1 (Mel)</u> <u>New Admissions–Elderly</u> MTW: Public Housing Non-MTW: Section 8 New Construction	MTW 330 Non MTW 449 Time Saved under MTW: 26.5%	20%	MTW 399 NonMTW 697 Time Saved Under MTW: 42.7%

<u>Staff #2 (Sharon)</u> <u>New Admissions–Family</u> MTW: Public Housing Non-MTW Section 8 New Construction	MTW 214 Non MTW 322 Time Saved under MTW: 33.5%	20%	MTW 223 NonMTW 278 Time Saved Under MTW: 19.8%
<u>Staff #3 (Judy)</u> <u>Annual Reexams</u> MTW: Housing Choice Vouchers Non-MTW: Mainstream Vouchers	MTW 79 Non MTW 100 Time Saved under MTW: 21.0%	20%	MTW 84 NonMTW 125 Time Saved under MTW: 32.8%
<u>Staff #3 (Judy)</u> <u>NewAdmissions</u> MTW: Housing Choice Vouchers Non-MTW: Mainstream Vouchers	No Baseline - new staff assignments during 2011-2012	20%	MTW 161 NonMTW 217 Time Saved under MTW: 25.8%
<u>Staff #4 (Maddy)</u> <u>Annual Reexams</u> MTW: Housing Choice Voucher Non-MTW: VASH Vouchers	<u>Baseline was during</u> <u>2010-2011</u> MTW 93 NonMTW 142 Time Saved under MTW: 34.5%	20%	MTW 154 NonMTW 157 Time Saved under MTW: 1.9%
<u>Staff #4 (Maddy)</u> <u>New Admissions</u> MTW: Housing Choice Voucher Non-MTW: VASH Vouchers	No Baseline - new staff assignments during 2011-2012	20%	MTW 181 NonMTW 200 Time Saved under MTW: 9.5%
<u>Staff #5 (Angie)</u> <u>Annual Reexams</u> MTW: Housing Choice Voucher Non-MTW: Section 8 New Construction	MTW 43 Non MTW 65 Time Saved under MTW: 34.0%	20%	MTW 81 NonMTW 95 Time Saved under MTW: 14.7%

Staff #6 (Ericka) <u>Annual Reexams</u> MTW: Housing Choice Voucher Non-MTW: Burke Plaza, Section 8 New Construction	Baseline was during 2010-2011 MTW 36 NonMTW 64 Time Saved under MTW: 43.8%	20%	MTW 45 NonMTW 72 Time Saved under MTW: 37.5%
Staff #7 (Jan) <u>Annual Reexams</u> MTW: Housing Choice Voucher Non-MTW: VASH Vouchers	Baseline was during 2010-2011 MTW 73 NonMTW 94 Time Saved under MTW: 22.3%	20%	Staff #7 no longer does non-MTW work so no results are presented here.
Staff #8 (Sara) <u>Annual Reexams</u> MTW: Housing Choice Voucher Non-MTW: Burke Plaza, Section 8 New Construction	No Baseline - new staff assignments during 2011-2012	20%	MTW 67 NonMTW 96 Time Saved under MTW: 30.2%
Staff #8 (Randi) <u>New Admissions</u> MTW: Public Housing Non-MTW: Section 8 New Construction	No Baseline - new staff assignments during 2011-2012	20%	MTW 221 NonMTW 457 Time Saved under MTW: 51.6%

A proxy measure of efficiency for this initiative is the amount of postage per year. By using a simplified approach to rent calculations, we were able to see reduced postage costs in MTW programs even with an increase in postage rates:

Postage Costs***	2008-2009	2009-2010	2010-2011**	2011-2012
MTW PROJECTS				
Housing Choice Vouchers	\$28,062	\$25,619	\$24,107	\$27,888
Public Housing	\$2,904	\$3,015	\$3,836	\$3,777
AMP 1	\$973	\$779	\$1,413	\$1,131
AMP 2	\$1,398	\$1,758	\$2,147	\$1,987
AMP 3	\$533	\$479	\$ 547	\$659
TOTAL FOR MTW PROJECTS	\$33,870	\$31,650	\$32,056	\$31,665

NON-MTW PROJECTS				
Burke Plaza	\$1,038	\$1,154	\$861	\$1,072
VASH* and Mainstream	\$16	\$523	\$229	\$284
New 32	421	\$433	\$477	\$407
TOTAL FOR NON-MTW PROJECTS	\$1,475	\$2,110	\$1,567	\$1,763

*VASH was a new program

**2010-2011 included a mailing to all households seeking applicants for appointment as the resident representative to the LHA Board of Commissioners.

***there was a postage rate in January 2012; for example \$.01 for 1 ounce first class

METRIC	BASELINE	BENCHMARK	OUTCOME
Postage costs by project as a proxy measure to simplified rent calculation initiatives	April 1, 2008 to March 31, 2009	<u>MTW Projects:</u> Same or Reduced postage compared to Baseline <u>Non-MTW Projects:</u> Same or increased Postage	April 1, 2011 to March 31, 2012
MTW Projects	\$33,870	\$33,870 or less	\$31,665
Non-MTW Projects	\$1,475	\$1,475 or more	\$1,763

Hardship Households

In implementing the rent calculation based on 27% of gross income, the housing authority implemented a hardship provision which stated that a household's maximum increase in total tenant payment would not exceed \$25.00 per annual reexamination as a result of this policy. However, rent increases due to increased income do apply. Following is the number of households for whom this hardship provision applied.

Project	4-2009	3-2010	3-2011	3-2012
Public Housing	70	41	20	14
Housing Choice Voucher	162	88	32	19

A minimal number of households were adversely impacted from the MTW rent policy changes that eliminated program deductions and implemented a lower standard percentage on gross income to determine the TTP. The data collected above indicates that the number of households under the hardship provision for the policy is under a steady decline and fewer households remain under the hardship policy than anticipated (4.38% of the public housing tenants and .65% of the housing choice

voucher participants remain under the hardship provision). We anticipate the number of households with the hardship provision will continue to decline throughout the next fiscal year.

In addition to monitoring the number of households utilizing the hardship policy provision, we monitored the number of households who were under this provision that ended program participation. There were no public housing tenants or voucher participants under the hardship provision who were terminated for non-payment of rent.

IMPACT OF \$25.00 Minimum Rent

The impact of the \$25.00 minimum rent is determined from data in our housing software. Data showing households with a \$25.00 rent are the households affected by this requirement.

Households Responsible for \$25 Minimum Rent	Number of households 3/31/2011	Number of households 3/31/2012
Public Housing	11	15
Housing Choice Voucher	237	175
Combined	248	190

For hardship purposes, households in which the head is disabled and has a current Social Security application pending are excluded from the requirement. Following is the data to show the number of households excluded from this requirement and whose rent was less than the \$25.00 minimum rent.

Households Excluded from \$25 Minimum Rent	Number of households 3/31/2011	Number of households 3/31/2012
Public Housing	0	1
Housing Choice Voucher	21	41
Combined	21	42

LHA monitored the impact of the \$25.00 minimum rent by looking at the reasons participants ended their participation in the Housing Choice Voucher program or moved out of a Public Housing unit. In the HCV program, LHA found only three households with minimum rent of \$25 and whose program participation ended due to an eviction for non-payment of tenant rent. In public housing, no household with minimum rent of \$25 ended due to an eviction for non-payment of tenant rent. Adding the VASH vouchers to the MTW voucher program is the reason for this year’s increase in Housing Choice Voucher minimum rent exclusions. All VASH participants are automatically exemption from the minimum \$25 rent policy.

This data shows the minimum rent of \$25.00 does not create an undue hardship inasmuch as there were only three rent-related evictions out of 190 households with minimum \$25 rent. Households with minimum rent are evicted less frequently for non-payment of rent compared to all other households.

METRIC	BASELINE	BENCHMARK	OUTCOME
Households Terminated due to non-payment of rent	April 1, 2009 to March 31, 2010 Number of Households	Termination Rate for non-payment of rent will be same or less for Minimum rent households compared to Other MTW households	April 1, 2011 to March 31, 2012 Number of Households
Minimum Rent Households terminated due to non-payment of rent	HCV: 0 PH: 0		HCV: 3 PH: 0
Total Number of Households terminated due to non-payment of rent	HCV: 21 PH: 1		HCV: 39 PH: 3
Termination Rate for Non Payment of Rent: MTW households at \$25 Minimum Rent compared with All Other MTW households	<u>HCV:</u> <u>Min Rent households:</u> 0 out of 467 terminations = 0% <u>Other MTW households</u> 21 out of 467 terminations = 4.5% <u>Public Housing:</u> <u>Min Rent households:</u> 0 out of 62 terminations = 0% <u>Other MTW households</u> 1 Out of 62 terminations = 1.6%	Rate less than or equal to Other MTW	<u>HCV:</u> <u>Min Rent households:</u> 3 out of 576 terminations less than 1% <u>Other MTW households</u> 36 out of 576 terminations = 6.3% <u>Public Housing:</u> <u>Min Rent households:</u> 0 out of 48 terminations = 0% <u>Other MTW households</u> 3 Out of 48 terminations = 6.3%

C. CHALLENGES AND NEW STRATEGIES

Challenges for TTP calculation on 27% gross income.

In reviewing our data for this activity for this fiscal year, we noticed the administrative time reported increased for most of the staff. Better interviewing, possibly better time tracking and staff changes most likely played a role in the increased administrative time. Staff completed an interview training in August 2011 to improve their skills with gathering information to determine eligibility. The Housing Specialist job expectations were modified by increasing the expected time of an eligibility interview from 20 -30 minutes to 45-60 minutes. Thirty-three percent of the Housing Specialists have one year or less experience in their position during FY 2012. We continue to find that it is more accurate to compare the same activity with the same staff person rather than comparing the same activity to a different staff person. Staff performance can play a major role in the amount of time spent on administering a program, and our strategy is to compare the same staff person's administrative time on MTW versus non-MTW work.

In the voucher program, VASH vouchers are now receiving the benefits of the MTW program. In September 2011, Moving to Work policies were approved to be implemented within the VASH program, so the VASH program will no longer be a valid control group. The only remaining programs to use as voucher control groups are the Mainstream vouchers and Section 8 New Construction.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

1. Improved Accuracy - TTP based on 27% gross income

The public perception is that the 27% gross income TTP is a simple rent calculation and is easy to understand. The Nebraska Department of Health and Human Services Department has a contract with Region V Systems to implement a housing assistance program that mimics the Housing Choice Voucher program. Region V Systems chose to use LHA's Moving to Work rules, specifically, the 27% TTP rule for rent calculations because of the fair and simple approach.

In addition to the time savings, LHA determined the simplicity in applying the 27% gross income TTP policy resulted in improving our rent calculation accuracy. During this fiscal year, 112 Non-MTW files were audited for program accuracy and eight had deduction errors found in the case files. Eight deduction errors is an unusually small number of deduction errors, but it should be noted that in the VASH and Mainstream population, there are very few medical deductions because their medical expenses are covered by the VA or Medicaid. Of 679 MTW files audited, there were no deduction errors.

In January 2004 at a Public Housing Rental Integrity Summit, deductions were reported to be a problem area in rent calculations as identified by HUD's Office of Policy Development and Research (PD &R). Based on this fiscal year audits, our *simplified* MTW 27% gross income TTP calculation policy appears to have improved our rent calculation accuracy by at least 7%.

The time savings with implementing the 27% TTP calculation has allowed LHA to utilize more staff time to audit rent calculation and ensure policy is applied fairly and consistently by staff.

E. DATA COLLECTION METHODOLOGY AND REVISIONS

1. TTP based on 27% gross income

In November 2009, our HUD liaisons contract manager suggested a change in our data collection strategy to occur based on a specific point in time. As advised, we restructured our data collections for the Public Housing and Housing Choice Voucher programs. The time study data collection process seems to be the most accurate and least time consuming method.

2. VASH program eliminated as a control group

Moving to Work policies were approved to be implemented within the VASH program in September 2011, thus the VASH program will not be used as control group. The Mainstream voucher program and Section 8 New Construction will continue to be used as control groups.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable.

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.11. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies for setting rents in public housing including establishing the definitions of income and adjusted income. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 6.632, 5.634 and 960.255 and 966 Subpart A.

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.2. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated requirements. This authorization waives certain provisions of Section 8(o)(1), 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.

Rent Reform 4

A. ACTIVITY: RENT BURDEN

Rent Burden (HCV Program)

Year Identified: November, 2007

Effective Date: February 1, 2008

Statutory Objective:

Increase housing choice for low income families

The maximum initial rent for a family shall not exceed 50% of their monthly adjusted income at the time of approving tenancy and executing a HAP contract.

B. BENCHMARKS, METRICS, AND IMPACT

This initiative was revised from LHA's original MTW plan in which we did not have any cap on the amount of tenant payment for rent and utilities. LHA's original plan was strongly endorsed by residents during our original MTW planning process. Over the years, we collected experience and anecdotal information through which we determined that a number of households were overextending themselves on housing costs to the point of being unable to pay rent and thereby losing their housing. This initiative, revised in 2008, put a cap on the initial tenant rent portion at no more than 50% of adjusted income. Utility costs were not included in the 50%. The regular voucher program limits the tenant rent plus utilities to no more than 40% of adjusted income.

The table below shows number of households at new admission or transfer whose initial tenant rent portion is greater than 40% of their monthly adjusted income and, at the same time, their maximum initial tenant rent portion is less than 50% of monthly income.

2009 to 2010	2010 to 2011	2011 to 2012
144	166	183

The revised policy establishing a cap on tenant rent being no more than 50% of the tenant's monthly income eliminated affordable housing disagreements between the program participant and LHA housing specialists. Rather than discussing and encouraging participants to consider what they could afford, the revised policy simply set an absolute threshold, while providing greater flexibility and housing choices to participants than the regular program rules.

During the 2010 -2011 reporting period, LHA began collecting data on the census tracts for MTW voucher families who were new admissions or transfers and who chose to incur rent burdens that exceed 40% of their adjusted income. We refer to these households as "MTW Rent Burden" families for the sake of simplicity. We collected this information to determine if these families are expanding their housing opportunities when incurring the higher rent burdens. We compared this data to new

admissions and transfers of non-MTW vouchers (Mainstream and VASH), who were unable to exceed the rent burden limits of the regular voucher program. Last year’s data collection was a new method and served as our baseline for this initiative.

METRIC	BASELINE	BENCHMARK	OUTCOME
	April 1, 2010 to March 31, 2011	Distribution of MTW Rent Burden (over 40%) Households among census tracts compared to Non-MTW	April 1, 2011 to March 31, 2012
Total Number of census tracts MTW Rent Burden (over 40%) households reside in compared to Non-MTW households	MTW- 36 Non-MTW- 8	MTW is greater than Non-MTW	MTW- 40 Non-MTW- 14

METRIC	BASELINE	BENCHMARK	OUTCOME
	April 1, 2010 to March 31, 2011	MTW Rent Burden (over 40%) households residing in census tracts with a minority population of 25% or greater compared to Non-MTW households	April 1, 2011 to March 31, 2012
Percentage of MTW Rent Burden (over 40%) households residing in census tract with a minority population of 25% or greater compared to non-MTW households	MTW: 21.7% Non-MTW:60%	MTW percentage is less than Non-MTW percentage	MTW: 14.2% Non-MTW: 59.5%

METRIC	BASELINE	BENCHMARK	OUTCOME
	April 1, 2010 to March 31, 2011	MTW Rent Burden (over 40%) Households residing in low or moderate income census tracts* compared to Non-MTW households	April 1, 2011 to March 31, 2012

Percentage of MTW Rent Burden (over 40%) households residing in low or moderate income census tracts* compared to non-MTW households	MTW: 46.4% 77 households	MTW percentage is less than Non-MTW percentage	MTW: 46.4% 85 households
	Non-MTW: 80% 16 households		Non-MTW: 73% 27 households

*Census tracts where the median family income of the census tract is less than 80% of the area median family income.

The data clearly shows that our MTW Rent Burden rule allows families greater housing choices relative to the standard voucher program rules. The MTW Rent Burden families were much more likely to be dispersed in a wide range of census tracts than non-MTW families (40 to 14), and were less likely to choose housing in areas of minority or lower income concentrations.

Again this year, the data showed that the MTW policy allowed families access to certain Low Income Housing Tax Credit (LIHTC) properties. Several census tracts stand out as having higher percentages of MTW Rent Burden families and zero non-MTW families relocating there. In fact 41.5% of the MTW Rent Burden families moved into five census tracts, each of which we recognize as having a large LIHTC property. These LIHTC properties, although designed for low-income persons, have rent structures that significantly exceed the Fair Market Rents and Payment Standards for the voucher program. It is clear that, by allowing families to choose a greater share of the rent burden, the MTW Rent Burden rule is important to making these properties available to more voucher families than would otherwise be possible. Two of the census tracts are designated by the Census as “upper” income, two are “middle” income and one is “moderate” income.

This MTW initiative offers participating households more housing options within the city of Lincoln, Nebraska compared with non-MTW vouchers. Households are able to make a choice of housing in accordance with their individual financial circumstances. Voucher participants have a choice to exceed the federal rent burden limit of 40% of their adjusted income. The initiative does not impose a hardship but allows households to make a choice.

As noted above, this initiative was modified from the original plan.

C. CHALLENGES AND NEW STRATEGIES

Obtaining and analyzing census tract information continues to be an administrative burden. It would improve the process if the MTW 50058 Adhoc Report in HUD’s PIC system would gather census tract information from the MTW 50058 so an MTW Adhoc report could be created to obtain census tract information. We hope that future changes in our housing software will make this easier. Since we are limiting this analysis to new admissions and transfer moves, we have been able to accomplish the tracking by looking up each file individually.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not Applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

As noted above, we implemented new data collection during the 2010 -2011 reporting period, which serves as the baseline for this initiative.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable.

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.2. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated requirements. This authorization waives certain provisions of Section 8(o)(1), 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.

Rent Reform 5

A. ACTIVITY: AVERAGE UTILITY ALLOWANCES

Average Utility Allowances (HCV Program)

Year Identified: April 1, 1999

Effective Date: July 1, 1999

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

LHA uses one standard utility allowance per bedroom size and will not issue utility reimbursement checks or payments. The utility allowances are calculated annually using the current average utility cost per number of bedrooms per unit.

Following is the chart for target rents and utility allowances (effective February 1, 2012)

Bedroom Size	Fair Market Rent	Payment Standard	Payment Standard as a Percent of FMR	Target Rent	Utility Allowance
SRO	\$350	\$338	96.84%	\$303	\$35
0	\$466	\$451	96.8%	\$405	\$46
1	\$523	\$506	96.8%	\$437	\$69
2	\$665	\$644	96.8%	\$536	\$108
3	\$933	\$904	96.9%	\$766	\$138
4	\$1,131	\$1,095	96.9%	\$912	\$183
5	\$1,301	\$1,259	96.8%	\$1,044	\$215
6	\$1,470	\$1,423	96.8%	\$1,181	\$242
Lot Rent	\$266	\$258	96.9%		

B. BENCHMARKS, METRICS, AND IMPACT

This activity has made the voucher program much easier to understand for landlords, tenants, human service agency workers, and the general public. No specific measures were designed to measure that aspect of the activity although anecdotal data over the years has proven this to be true. Human service workers whose clients have vouchers have commented that the MTW voucher program is much easier to understand versus the VASH voucher program. This is one of

the reasons the VA agreed to convert VASH to MTW rules. In the past, LHA hosted workshops for community human service workers. The 3 ½ hour workshops provided detailed information on the LHA programs and how tenant payments were determined. The more simplified approach to utilities was overwhelmingly supported by human service workers who attended the workshops and who provide advocacy and service coordination for their clients receiving housing assistance. LHA has also reached out to individual human service agencies and conducted programs to educate human services staff about LHA’s programs.

The concept of the Target Rent is fundamental to the success of our voucher program. Tenants know to search for units at or below the Target Rent amount. They know that if they go above the Target Rent they will pay the difference in rent without additional subsidy. It is simple to understand and very customer friendly. It also provides an incentive for the tenant to seek energy efficient units or units with utilities paid by landlords. It provides an easy benchmark for tenants, human service workers and landlords to judge if a unit will be affordable for a voucher tenant.

In the traditional HUD program, as implemented by LHA using VASH (until 10-2011) and Mainstream Vouchers, a tenant does not know exactly what rent amount they might pay, if a unit is above or below the payment standard, or if a unit will be over the 40% rent burden rule until they turn in a Request for Tenancy Approval form to LHA. They are asked to search for a unit with a complicated utility worksheet, and, for most clients, an incomplete understanding of how all the calculations fit together. It is frustrating for the tenants, human service workers, and landlords.

This activity has significantly reduced utility allowance errors each month. National statistics in the past have shown utility allowance errors to be in the top 5 of RIM errors. Data for 2011-2012 for the LHA voucher program shows that utility allowance errors are 72 times more likely in non-MTW programs compared to the MTW program.

METRIC	BASELINE	BENCHMARK	OUTCOME
Percent of audited files with utility allowance errors	April 1, 2009 to March 31, 2010 (Baseline was Post-Implementation)	Utility Allowance Errors for MTW and Non-MTW Audits	April 1, 2011 to March 31, 2012
MTW Audits	0% Utility Allowance Errors	<1% Utility Allowance Errors	.1% Utility Allowance Errors
Non-MTW Audits	15% Utility Allowance Errors	<15% Utility Allowance Errors	7.24% Utility Allowance Errors

C. CHALLENGES AND NEW STRATEGIES

The small control group can affect data collection. In the past year, VASH was converted to MTW rules. The only remaining control group will be 20 Mainstream vouchers. These vouchers are typically single person households in one bedroom units. There is only one staff

person assigned to these and we anticipate very few errors going forward. Nonetheless, it is clear that the standard utility allowance and Target Rent concept is simpler and much less prone to errors.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

LHA anticipates no hardship through this initiative and, to date, there have been no requests for relief. The average utility allowance has been a part of our MTW plan from the beginning and rates have been adjusted annually. The initiative poses no added burden on participants.

The Nebraska Department of Health and Human Services Department has a contract with Region V Systems to implement a housing assistance program that mimics the Housing Choice Voucher program. Region V Systems chose to use LHA's MTW rules, specifically, the utility allowance policy because of the simplistic approach and the ability to assist the voucher holder in their housing search by determining "target rents". The simplicity in providing a target rent through a standard utility allowance by unit bedroom size allows the tenant to independently search for a unit and allows the tenants greater self sufficiency to make housing choices that meet their families' needs.

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable.

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.11. Rent Policies and Term Limits. Under this section, the housing authority is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The housing authority is authorized to adopt and implement any reasonable policies for setting rents in public housing including establishing the definitions of income and adjusted income. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 6.632, 5.634 and 960.255 and 966 Subpart A.

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.2. Rent Policies and Term Limits. Under this section, the housing authority is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance. The housing authority is also authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated requirements. This authorization waives certain provisions of Section 8(o)(1), 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.

OTHER INITIATIVES

Initiative 1

A. ACTIVITY: INCOME ELIGIBILITY

Income Eligibility (HCV & PH Programs)

Year Identified: April 1, 1999

Effective Date: July 1, 1999

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

All applicants for HUD subsidized units must provide adequate evidence that the household's anticipated annual income for the ensuing twelve month period does not exceed the following income limits based on area median income adjusted for family size:

Public Housing: 80% of median income

Housing Choice Voucher: 50% of median income.

Income targeting will not be used.

B. BENCHMARKS, METRICS, AND IMPACT

Lincoln Housing Authority is using its MTW authority to waive income targeting standards. Rather than use national income targeting standards, LHA has designed its preference system to fit local needs and local program goals. The preferences LHA selected in public housing, i.e. working preference, tend to pull average income for new admissions to a higher level than might otherwise occur. Elderly and disabled households also qualify for a "working" preference which can mitigate that affect. On the other hand, the preferences used in the housing choice voucher program tend to bring the overall average income for new admissions to a lower level.

LHA does not measure income targeting on an on-going basis, nor do we alter the order of the waiting list to meet income targeting goals. We did review the admissions for the fiscal year for this report. In FY 2011-2012, both the voucher and public housing programs met the federal income targeting standards. In the Public Housing Program, 49.1% of new admissions were Extremely Low Income. In the Voucher Program, 88.3% of new admissions were Extremely Low-Income. Both of these percentages were higher than the previous year.

METRIC	BASELINE	BENCHMARK	OUTCOME
Income Levels at Admissions	April 1, 2009 to March 31, 2010	<u>NOT APPLICABLE:</u> Income targeting is not applicable but normal targets are shown for information purposes.	April 1, 2011 to March 31, 2012
Public Housing			
Extremely Low Income	50.0%	40%	27 out of 55 (49.1%)
Very Low Income	36.8%		24 out of 55 (43.6%)
Low Income	13.2%		4 out of 55 (7.3 %)
Housing Choice Voucher* *includes VASH conversion			
Extremely Low Income	86.9%	75%	536 out of 607 (88.3%)
Very Low Income	13.0%		70 out of 607 (11.5%)
Low Income	0%		1 out of 607 (0.2%)

It is reasonable to expect that the Voucher program will continue to meet federal targeting standards, given the nature of the preference system. The Public Housing program is smaller and could be prone to yearly changes in income levels due to small variations in the number of vacancies in elderly units vs. family units or the number of disabled families vs. working families.

C. CHALLENGES AND NEW STRATEGIES

Not applicable

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.2. Local Preferences and Admission and Continued Occupancy Policies and Procedures. Under this section, the housing authority is authorized to develop and adopt local preferences and admission policies and procedures for admission into the public housing program in lieu of HUD statues, regulations or other requirements based on the 1937 Act so long as the families assisted qualify as low income, and that the total mix of families assisted meets the requirements of part I.C of the Amended and Restated MTW Agreement. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R. 960.206 as necessary to implement the Agency's Annual MTW Plan.

Housing Choice Voucher:

This MTW activity is authorized in Attachment C, Section D.3.a and D.4. Under these sections, the housing authority is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(s) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have otherwise in Section I.C. of the MTW Agreement are met. Further, the Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 16(b) and 9(o)(4) of the 1937 Act and 24 C.F.R. 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW Plan. The authorization also waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

Initiative 2

A. ACTIVITY: RESTRICTED PORTABILITY

Restricted Portability (HCV Program)

Year Identified: April 1, 1999

Effective Date: July 1, 1999

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

Voucher participants will not be allowed to port out unless the family requests and is granted an exception as a reasonable accommodation for employment, education, safety or medical/disability need.

B. BENCHMARKS, METRICS, AND IMPACT

The purpose of restricted portability in our MTW program was to prevent families from porting out with their voucher because of our MTW policies. It was anticipated that some families would choose to port out just to avoid the work requirements and other expectations of the MTW program. Portability was allowed for specific reasons as listed above.

Our data shows the number of formal requests to port out and the number approved. Families are given information about our restricted portability policy, and it is recognized that once people are aware of the policy, few formal requests are made.

METRIC	BASELINE	BENCHMARK	OUTCOME
Percentage of Requests Approved to Port with Voucher	April 1, 2009 to March 31, 2010	Approve 100% of Ports for Verified Medical, Disability, Safety, Education or Employment	April 1, 2011 to March 31, 2012
Percentage of Medical or Disability Requests Approved	9 out of 9 = 100%	100%	9 out of 9= 100%
Percentage of Safety Requests Approved	5 out of 5 = 100%	100%	5 out of 5 = 100%
Percentage of Education Requests Approved	1 out of 1 = 100%	100%	4 out of 4 = 100%

Percentage of Employment Requests Approved	5 out of 5 = 100%	100%	21 out of 21 = 100%
Percentage of Other Requests Approved*	0 out of 3 = 0%	0%	0 out of 4 =0%
* In all four denials, the voucher participant was unable to provide verification of their good cause claim to port-out of Lincoln; 1 request was denied because the employer did not exist, 2 requests were denied as the medical profession stated the port-out request was not medically necessary and another request was to port-out for a 2 week course on nail work which could be taken in the Lincoln area instead of Las Vegas.			

Our policy represents a highly successful implementation of a more restricted portability policy that could be adapted on nationwide basis. Portability represents a difficult and time consuming administrative issue in the voucher program across the country. Allowing HA's to adopt policies that limit ports to verifiable, good cause reasons would improve efficiency in voucher program administration nationwide.

C. CHALLENGES AND NEW STRATEGIES

Not applicable

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Housing Choice Vouchers:

This MTW activity is authorized in Attachment C, Section D.1.g. Under this section, the housing authority is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. This authorization waives certain provisions of Section 8 of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the housing authority's Annual MTW Plan.

Initiative 3

A. ACTIVITY: BIENNIAL RE-EXAMINATIONS

Biennial Re-examinations (HCV and PH)

Year Identified: November, 2008

Effective Date:

Public Housing:

Effective March 15, 2009 for new move-ins

Effective July 1, 2009 for current tenants

Housing Choice Voucher

Effective April 1, 2009 for new admissions

Effective July 1, 2009 for some current program participants (see transition plan)

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

LHA will conduct a reexamination of an elderly or disabled household at least every two years. An elderly or disabled household is any family where the head or spouse (or sole member) is at least 62 years of age or a person with a disability.

All households will continue to have interim reexaminations according to administrative policy.

All other household compositions will continue with an annual reexamination.

B. BENCHMARKS, METRICS, AND IMPACT

Baseline data for this initiative came from the PIC system. The benchmark for annual reexaminations was based on a 50% reduction from the baseline for elderly and disabled households.

Public Housing

For any elderly or disabled family whose annual re-examinations were scheduled to be conducted from July 1, 2009 to June 1, 2010, LHA delayed the annual re-examination to the following year and will conduct it every two years thereafter. Interim re-examinations continue to be done in accordance with policy, and elderly and disabled families are not exempt from reporting changes in household composition or other changes.

For any elderly or disabled tenants who were new move-ins on March 15, 2009 or after, LHA now schedules the next re-examination on the first of the same month two years after the move-in month.

Housing Choice Voucher

Beginning April 1, 2009, LHA is conducting re-examinations every two years for elderly and disabled households.

For households issued vouchers prior to April 1, 2009, LHA established a transition policy for biennial re-examinations. This transition policy was effective for current elderly or disabled households with annual re-examinations effective July 1, 2009 to June 1, 2010. In order to manage workloads during the transition to a biennial schedule, LHA randomly assigned households to one of two groups based on the last digit of the head’s social security number. During implementation, group one had their next reexamination in one year and group two in two years and continuing every two years thereafter for both groups. Any elderly or disabled households designated as “hardship” households under the 27% MTW policy were immediately placed in group two. This biennial initiative further reduces the impact of the 27% MTW policy and creates an additional benefit for the hardship group.

METRIC	BASELINE*	BENCHMARK		OUTCOME		OUTCOME	
Annual Re-Examinations in a 12 month period	August 1, 2007 to July 31, 2008	50% reduction for elderly and disabled households		April 1, 2010 to March 31, 2011		April 1, 2011 to March 31, 2012	
		----- Number of Reviews & Percent of Baseline		----- Number of Reviews & Percent of Baseline		----- Number of Reviews & Percent of Baseline	
Public Housing							
Elderly Households	61	31	50%	43	70.5%	32	52.5%
Disabled Households	60	30	50%	35	58.3%	18	30%
TOTAL	121	61	50.4%	78	64.5%	50	41.3%
		Average over 2 years:				64 reviews 52.9%	
Housing Choice Voucher							
Elderly Households	360	180	50%	168	46.6%	164	45.6%
Disabled Households	768	384	50%	388	50.5%	432	56.3%
TOTAL	1,228	564	45.9%	556	45.3%	596	48.5%
		Average over 2 years:				576 Reviews 46.9%	

*Baseline data was taken from PIC system whereas subsequent data was taken from actual monthly counts. Baseline data is, in fact, under-reported because PIC data showed only the last action in PIC.

The data above shows that we have reduced by approximately half the number of elderly and disabled reviews conducted per year. A more meaningful number is the average number of reviews in the combined programs is 640 per year compared to the baseline number of 1,349

representing 709 fewer reviews.

This time savings has allowed us to staff with one less housing specialist and replace that person with an auditor in the second year of the initiative. It should also be noted that there is housing specialist time lost to extra time for MTW data collection. We were also able to serve more families by administering additional specialized voucher programs such as Mainstream vouchers, Enhanced vouchers and Veterans Affairs Supportive Housing vouchers without additional staff. The cost savings has allowed us to serve more families by facilitating and offering our applicants, in addition to our program participants, a 12 hour tenant educational series called Nebraska RentWise. The cost saving has also allowed our staff more quality interviewing time with our participants.

C. CHALLENGES AND NEW STRATEGIES

In the data, there are some annual re-examinations that were completed for disabled households. This action was correct because some households were not considered disabled until after the re-examination was completed.

Data collections on the number of completed annual re-examinations identified by elderly, disabled and family is challenging. LHA has several options for collecting this data; 1) tracking by the worker, 2) using the housing software 50058 reports, or 3) using PIC 50058 MTW Adhoc reports. We have attempted to track the data from all three options and found they each have imperfections. The biggest issue with using the housing software 50058 reports or the PIC report is capturing the annual re-exam completion before another action is completed on the 50058. If another action such as interim or inspection is entered on the 50058 after the annual re-exam is completed, the annual re-exam completion will not be counted in any MTW Adhoc PIC report or housing software 50058 report. Since annual re-exams are completed between 30 to 90 days ahead of the due date it is hard to predict the best time to capture the annual review completion data. For example, Jane Doe's August 2011 annual re-exam is completed on June 1, 2011 but an interim is also completed on June 1, 2011 effective July 1, 2011. If we run a report for August 2011 annual re-exams on June 1st or later, the August re-exam will not show as completed in the Housing Software report. If we run the August re-exam report on May 31st, it will show Jane Doe's August 2011 re-exam as completed but we will miss other August 2011 re-exams still being completed in the month of June. The PIC MTW Adhoc report also has its flaws. The PIC MTW Adhoc report does not provide the 50058's line 1c as a selection criteria for reports thus we can not identify what program, Housing Choice Voucher or Public Housing, the re-exams were completed in. Also, we can not always identify whether the household is an elderly household because the MTW Adhoc report only allows us to gather birth dates for the head of household, and not the co-head.

We will continue to use the housing 50058 software as our data collection source. The report is run 30 days prior to the effective date to obtain the most accurate data on the number of annual re-exams completed. The complexity of tracking and reporting data often reduces the amount of time savings accomplished through skipping annual re-examinations.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

LHA anticipates no hardship through this initiative and, to date, there have been no requests for relief. Public housing tenants and voucher participants benefit because they could have increased income between biennial reexaminations without a corresponding increase in their rent payment. This initiative produces no additional burden or hardship to households than they would otherwise experience under an annual review system. They continue to be eligible for rent decreases by means of interim reexaminations if they experience decreased income.

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Public Housing:

This MTW activity is authorized in Attachment C, Section C.2. Initial, Annual and Interim Income Review Process. Under this section, the housing authority is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided. This authorization waives certain provisions of Section 3 (a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R. 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.

Housing Choice Vouchers:

This MTW activity is authorized in Attachment D.1.c Operational Policies and Procedures. Under this section, the housing authority is authorized to define, adopt, and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 C.F.R. 982.516 as necessary to implement the Agency's Annual MTW Plan.

Initiative 4

A. ACTIVITY: HQS INSPECTIONS WAIVER

HQS Inspections Waiver (HCV Program)

Year Identified: November, 2008

Effective Date: April 1, 2009

Statutory Objective:

Reduce cost and achieve greater cost effectiveness in federal expenditures

To encourage participating landlords and tenants to maintain their units in compliance with Housing Quality Standards (HQS), the required annual inspection will be waived for one year if the annual inspection meets 100% HQS upon first inspection at initial or annual inspection. All units will be inspected at least every other year. This initiative will also allow inspections to coincide with the next annual reexamination date rather than HUD's interpretation that inspections be conducted within 365 days of the previous inspection. HUD's interpretation resulted with a schedule of re-inspections every 10 months to ensure compliance with the interpretation of "every 365 days." Special inspections will continue to occur as determined by LHA. HUD's Request for Tenancy Approval form was modified to satisfactorily implement this inspection incentive initiative.

B. BENCHMARKS, METRICS, AND IMPACT

The baselines for this initiative were the number of annual inspections during a 12 month period and the success rate percentage on 1st inspection. The number of annual inspections was expected to decrease while the success rate percentage at first inspection was expected to increase. This initiative was implemented April 1, 2009. Beginning with that date, for any annual or initial "pick up" inspection in which the unit meets 100% HQS compliance at the first inspection, the annual HQS inspection of this unit with the same tenant may be waived for one year. If at any time the unit requires a special inspection, the inspection incentive is revoked and the unit must have an annual inspection completed by the tenant's next annual re-examination date.

HISTORICAL DATA ON INSPECTIONS	Fiscal Year 2007-2008	Fiscal Year 2008-2009	BASELINE Fiscal Year 2009-2010	Fiscal Year 2011-2012
Annual Inspections	2,767	3,096	3,042	2,115
Initial Inspections	1,432	1,309	825	892
Special Inspections	11	34	44	24
Total Inspections	4,210	4,439	3,911	3,031
Passed at First Inspection	65%	60%	52%	41%
Failed at First Inspection	35%	40%	48%	59%

Total Inspections	100%	100%	100%	100%
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METRIC	BASELINE	BENCHMARK	OUTCOME
Number of Inspections by Type and Percentage Passing at First Inspection	April 1, 2009 to March 31, 2010	Reduction in total number of inspections	April 1, 2011 to March 31, 2012
Annual Inspections	3,042	40% Reduction from Baseline	2,115 30.5% Reduction
Initial Inspections	825		892
Special Inspections	44		24
Total Inspections	3,911	25% Reduction from Baseline	3,031 22.5% Reduction
		Maintain or Increase Passing Rate at First Inspection	
Pass at First Inspection	52%	52% or greater	41%
Failed at First Inspection	48%	48% or less	59%
Total Inspections	100%		100%

The benchmark for this initiative was to decrease the number of annual inspections by 40%. During FY12, annual inspections reduced by 30.5%. Two events contributed to missing the benchmark by 9.5% in the number of annual inspections completed: 1) several inspection policy changes were implemented in the past two years which lowered the first-time pass rate, and 2) inspections were conducted for the first time on units that were skipped the previous year.

Previously, we anticipated special inspections would go up significantly as we thought we would have more tenant complaints about the landlord not fixing defects. The result was the opposite; special inspections decreased 45.5% in FY12. Overall, we anticipated the total number of inspections would reduce by 25% of the baseline level. We came close to meeting this expectation by reducing the number of overall inspections performed by 22.5%.

Administrative Cost Savings, Efficiency and Quality of Housing Unit

The inspection incentive policy continues to have positive impact on the voucher program by providing administrative cost savings to LHA, and improving our community's housing stock. This inspection policy allowed LHA to reduce the number of performed inspections by 22.5%. LHA used this time savings to increase the average time spent on performing an annual inspection by 33%. The increased inspection time allowed inspectors an opportunity to

properly educate both the tenant and landlord on maintaining quality units, and allowed for more thorough HQS inspections to be performed. We increased the average annual inspection time from 15 minutes to 20 minutes per unit. Part of the increased time was to implement HUD Notice 2010-10, which required our inspectors to test electrical outlets for “proper operating condition.” The time savings allowed our inspectors additional time to assist other local affordable housing projects with unit inspections.

The pass rate was 52% for FY2010 when units were annually inspected in comparison to 41% pass rate for FY2012 when a combination of units were inspected annually and biennially. In addition we gathered data on the pass/fail rate for biennial unit inspections. The chart below indicates that skipping annual inspections does not have a significant impact on the quality of the unit or increase the failure rate at first inspection.

Inspection results on units with biennial inspections

April 2011 - March 2012 Overall inspection pass rate at First Inspection	April 2011 - March 2012 Percent of skipped inspection passing at First Inspection	Number of annual skipped inspections	Number of annual skipped inspections that passed first time
41%	40.3%	779	314

C. CHALLENGES AND NEW STRATEGIES

The challenge in using pass/fail rates as a policy success indicator is there are other outlying factors that can affect a pass/fail rate, such as policy changes and staffing. For example in FY2011, LHA made two major policy changes; 1) testing for proper working electrical outlets, and 2) enhancing the egress window requirements. These two policy changes could be the cause of the decline in the inspection pass rate over the two past years. When more units fail inspection due to a policy change it reduces the perception of maintaining quality units within HQS standards and reduces the administrative cost savings as fewer units are eligible to have their inspection skipped.

When comparing to FY2011 to FY2012, we completed 621 more annual inspections this year. This is a 41.6% increase in the number of annual inspections from the previous fiscal year. There were two main reasons more annual inspections were completed in FY2012; 1) fewer units passed inspection the first time, and 2) the units with skipped inspections year were inspected this year. More inspections means less administrative cost savings. We anticipate the number of inspections completed in future years will be similar to the number of inspections completed in FY2012.

The final challenge is to ensure the proper implementation and monitoring of this policy. The reports and data gathering is cumbersome and time consuming. If the policy was to complete

biennial inspections for “all” units regardless of the results of the inspection, it would be much simpler to implement and audit.

Request for Unit Information and Inspection form modified

LHA modified the Request for Unit Inspection and Inspection form, that is used in lieu of HUD’s RFTA form HUD 52517 , to reflect a city ordinance change that required all landlords to provide all trash services. In addition another modification was made after the Landlord Advisory Committee requested a statement be added to the form to indicate when assistance will start. The modified form can be found in Appendix D of this report.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Improved Program Satisfaction

Both the LHA Landlord Advisory Committee and other participating landlords continue to express sincere appreciation for rewarding landlords who maintain their property at a high level. This policy is supported by the City of Lincoln’s Stronger Safer Neighborhood initiative and Lincoln’s neighborhood revitalization committee, Free to Grow. These organizations have advocated for a new city ordinance to change Lincoln’s apartment inspection policy to mirror LHA’s policy.

This past fiscal year, the Landlord Advisory Committee complimented our Inspection Department on their excellent customer service by scheduling inspections within 5 to 7 business days of the request, improving the consistency in inspection results performed by all inspectors and availability to answer questions. These improvements were made possible through the administrative cost-savings of skipping inspections.

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

Housing Choice Vouchers

This MTW activity is authorized in Attachment C, Section D.5. Ability to Certify Housing Quality Standards. Under this section, the housing authority is authorized to certify that housing assisted under MTW will meet housing quality standards established or approved by HUD. The certification form will be approved or provided by HUD. This authorization waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982, Subpart I as necessary to implement the Agency’s Annual MTW Plan.

Initiative 5

ACTIVITY: Inspections and Rent Reasonable Determinations Regardless of Ownership or Management Status

HQS Inspections Waiver (HCV Program)

Year Identified: November, 2010

Effective Date: April 1, 2011

Statutory Objective: Reduce cost and achieve greater cost effectiveness in federal expenditures

A. DESCRIPTION

This was a new initiative in our 2011-2012 plan year. LHA is performing all Inspections and Rent Reasonableness determinations regardless of ownership or property management status. LHA performs these actions on all tenant and project-based voucher units that are owned or managed by LHA.

B. BENCHMARKS, METRICS, AND IMPACT

Objective: Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Impact: LHA has always inspected LHA-owned or managed properties under Public Housing, Tax Credit and Section 8 New Construction programs. The inspection audits including REAC inspections result in high scores and no significant findings

We did not expect any adverse impacts by implementing this activity. LHA maintains an internal check and balance system to ensure the quality and safety within their managed or owned property. This check and balance has been created through a segregation of duties. LHA has established seven departments and managers for each department. Specifically the Tenant-Based Department is responsible for the voucher program compliance while the Project-Based Department is responsible for maintaining and leasing LHA units. The segregation of duties allows the Tenant-Based department the ability to enforce HQS and rent reasonableness policies at the same level and effectiveness as working with a private landlord.

We expected the voucher participants would benefit with quicker response time in correcting any identified unit deficiencies because the internal communication would be faster than working with an outside contractor.

Eliminating the requirement to contract for these services also eliminated the administrative time in creating, advertising and monitoring outside contractors. In the past, LHA had been unable to find any expert in the community to perform these services or to perform them in a timely manner.

METRIC	BASELINE	BENCHMARK	OUTCOME
Contract Costs for Inspections	October 1, 2009 to September 30, 2010	Contract cost for Inspections/rent determinations	April 1, 2011 to March 31, 2012
Decrease in contract cost for HQS	256 inspections in FY2010 @ \$50 per contract cost for inspections/rent reasonableness \$12,800 in potential savings	\$0 on contracted inspections	244 inspections in FY 2012 @ \$50 per contract cost for inspections/rent reasonableness \$0 on contracted inspections \$12,200 in potential savings
First-time Pass Rate at LHA-owned Properties compared to all voucher-assisted properties	April 1, 2009 to March 31, 2010	LHA-owned Properties First-time Pass Rate	April 1, 2011 to March 31, 2012
Maintain a higher first time pass rate at LHA-owned properties compared to all voucher-assisted properties	121 out of 186 LHA-owned or managed properties pass inspection on the first time in FY 2010* 65% first time pass rate of LHA properties; 52% first time pass rate for all voucher properties	Maintain a pass rate better than the pass rate for all voucher properties	90 out of 167 LHA-owned or managed properties passed inspection on the first time in FY 2012 53.9% first time pass rate of LHA properties 41% first time pass rate for all voucher properties

*baseline revised from the plan—see explanation below

C. CHALLENGES AND NEW STRATEGIES

In reviewing the data gathered for the baseline, it was determined the Inspections software gathers every inspection performed including the inspection rechecks when determining the number of pass or fail inspections. This data is good for counting the number of actual inspections performed on LHA-owned or managed property. This data is not accurate when gathering the

number of units that pass at first inspection without requiring a recheck since it includes rechecks. The housing software 50058 module is the best source for gathering the number of units that pass at first inspections. The challenge with using the 50058 data is that it is only good as point-in-time data. If the household terminates from the program or moves during the fiscal year, the unit will not be reflected in the inspection pass/fail report at first inspection. After reviewing the accuracy of the baseline data for inspections, the baseline first-time pass rate and number of units was modified removing all the recheck inspections. For future reports we will gather information in the following manner to report the most accurate information.

1. Use the Inspection software to determine the number of inspections performed on LHA owned/managed properties.
2. Use the 50058 software to determine the first time pass numbers and rate on a monthly basis. Manually track the number of LHA owned/managed units in this report.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

See Section C above.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

This MTW activity is authorized in Attachment C, Section D.1.f Operational Policies and Procedures; Section D.2.c Rent Policies and Term Limits; and Section D.5 Ability to Certify Housing Quality Standards. Under Section D.1.f, the housing authority is authorized to determine property eligibility criteria. Under Section D.2.c, the housing authority is authorized to develop a local process that differs from the currently mandated program requirements in the 1937 Act and its implementing regulations. Under Section D.5, the housing authority is authorized to certify that housing assisted under MTW will meet housing quality standards established or provide by HUD. These authorizations waive certain provisions of Section 8(p), Section 8(o)(10) and Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982.507, 24 C.F.R. Subpart H, and 24 C.F.R. Subpart I.

Initiative 6

ACTIVITY: Project-Based Section 8 Units

Project-Based Section 8 Units (HCV Program)

Project-based units LHA owned or managed properties:

Year Identified: 2010

Effective Date: Originally scheduled to be implemented in 2011-2012 plan year.
Now scheduled for 2012-2013 plan year

Project-based units through other competitive process:

Year Identified: 2010

Effective Date: Pending receipt of a viable application

Statutory Objective: Increase housing choice for low income families

A. DESCRIPTION

This was a new initiative in our 2011-2012 plan year.

Project-based units through other competitive process:

LHA's plan was to project-base 20 vouchers to serve the disabled through an other competitive process. Under MTW, LHA will allow the selected project-based site to maintain a separate site-based waiting list.

Project-based units LHA owned or managed properties:

LHA's plan was to provide project-based Section 8 assistance to property owned or managed by LHA, without a competitive bid. Site selection for LHA owned or managed property will be based on the need to maintain and preserve affordable housing. Each site may create a separate waiting list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project.

Crossroads House Apartments is an elderly apartment complex with one-bedroom units located in the heart of Lincoln's downtown, 1000 O Street, Lincoln, Nebraska. There is a significant need for affordable elderly housing in this area. Most of the housing in this area is geared towards either the University of Nebraska students or upper income households residing in recently developed condominiums. In the 2010-2011 MTW Plan, we identified that there were 45 Crossroads House units leased to Section 8 Housing Choice Voucher participants among the 58 total units. Crossroads House was selected for project-based assistance because of the ongoing community need to preserve existing affordable housing for the elderly population in this area. Since Crossroads House is a "tax credit" project, the definition of elderly is defined as 55 years or older so several residents may not meet HUD's definition of elderly at 62 years of age, and the tax credit income eligibility limit is higher than the voucher program at 60% median income.

LHA chose a three-year transition period to complete 100% project-based allocation at the Crossroads House. The three-year transition period will begin with the original executed HAP contract. The purpose of the transition period is to prevent the displacement of the 60% median income households who are currently residing in the Crossroads House apartments. The transition period will also allow the opportunity to maintain 100% voucher leasing without undue hardship on the voucher program budget and allocation requirements. It is our intent to project-base all 58 units based on eligibility of current tenants.

The Moving to Work waivers are being used: 1) to transition LHA owned or managed units into Section 8 project based assistance without a competitive bid, 2) allow the project-based sites to maintain a site-based waiting list, and 3) allow the removal of the 25% unit allocation cap per project. LHA complies with Housing Quality Standards, subsidy layering requirements, and other federal requirements regarding project-based assistance as set forth in Title 24 fo the Code of Federal Regulations.

B. BENCHMARKS, METRICS, AND IMPACT

Objective: Increase affordable housing opportunities for the elderly through the use of project-based vouchers.

Impact:

As of November 1, 2010, 12.9% of the total utilized vouchers were assigned to elderly households; project-basing vouchers in an elderly designated complex would increase affordable housing opportunities for elderly households.

LHA’s plan was to create and preserve affordable housing opportunities for elderly households under the Housing Choice Voucher program.

Number of elderly residing at Crossroads House No vacant units	46 elderly households <u>12 near-elderly households</u> 58 total units
Number of income-restricted units (tax credit)	58 units
Number of project-based units leased	0

In 2011-2012, we planned to show that an increased number of project-based units and services to an increased number of elderly and disabled households assisted under the Housing Choice Voucher program.

Metric	Baseline	Benchmark	Outcome
Number project-based units leased	FY 2011 Project-based units leased = 0 units	Number of project-based units in FY 2012 40 units	Number of project-based units achieved in FY 2012 0 units
Number of elderly households with voucher assistance	FY 2011 Number of elderly households with voucher assistance = 372 households (point in time)	Number of elderly households with voucher assistance 390 households	Number of elderly households with voucher assistance at FY 2012 year end = 402 households
Number of disabled households with voucher assistance	FY 2011 Number of disabled households with voucher assistance = 964 households (point in time)	Number of disabled households with voucher assistance 984 households	Number of disabled households with voucher assistance at FY 2012 year end = 1,044 households

C. CHALLENGES AND NEW STRATEGIES

Project-based units through other competitive process:

As described in our 2011-2012 MTW Annual Plan, LHA anticipated awarding 20 Project-Based HCV units through an “other competition” process as described in the project-based regulations. These vouchers were to be tied to a Low Income Tax Credit project whose purpose is to promote voucher utilization and expand housing choices for persons with disabilities. This goal was not achieved. In April 2011, LHA received a project-based application from Creekside Apartments. The applicant proposed on-site case management services to households with chronic and serious mental illness. Unfortunately the environmental review was unfavorable because these units were located in an 100 year flood plain; thus the application was not accepted. LHA will continue to accept applications through an “other competitive process” to project-base a maximum of 20 units.

Project-based units LHA owned or managed properties

The housing authority also continues to plan the use of project-based vouchers at Crossroads House Apartments. After LHA received HUD approval on the 2011-2012 MTW Annual Plan, LHA sought approval from the Nebraska HUD office to project-base at Crossroads House Apartments before proceeding with establishing a project-based HAP contract. The Nebraska

HUD office provided written approval in January 2012. A plan is now being created to implement project-based vouchers at Crossroads House Apartments by July 1, 2012. The conversion will begin with units occupied by eligible residents who currently do not receive voucher assistance. We expect to have all 58 units converted to project-based vouchers within the next three years.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

This MTW activity is authorized in Attachment C, Section D.7.a Establishment of an Agency MTW Section 8 Project-Based Program. Under this section, the housing authority is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the agency that are not public housing, subject to HUD's requirements regarding subsidy layering. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. The agency is also authorized to adopt alternate standards for determining the location of existing housing to receive subsidy provided the requirements in Attachment C, Section D.7.c.i, ii, iii, and iv and Section D.7.d. are met. These authorizations waive certain provisions of Section 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan.

Initiative 7

ACTIVITY: Nebraska RentWise Tenant Education Program:

Nebraska RentWise Tenant Education Program (HCV and PH Programs)

Year Identified: November, 2010

Effective Date: October 1, 2011

Statutory Objective: Increase housing choice for low income families

A. DESCRIPTION

Under the broader use of funds authority, Lincoln Housing Authority proposed to use combined MTW funds to support Nebraska RentWise, a tenant education program.

This activity serves only households under 80% AMI and is related to the MTW objective of increasing housing choices for low-income families by providing training and education.

RentWise is a structured curriculum developed by the University of Minnesota and adapted by the University of Nebraska Extension Service. It is a program to educate renters on responsibilities necessary to become successful tenants with stable housing. Lincoln Housing Authority was instrumental in forming a collaborate group, the Lincoln RentWise Network consisting of representatives from an array of human service agencies in the Lincoln community. Network members identified the need for the program because of the common knowledge that many low income families had great difficulty obtaining rental housing because of past problems. Those problems include rental or credit history, lack of experience (first time renters), stigmas associated with rental assistance programs, or other issues that cause potential landlords to see them as high-risk tenants.

The objective of the Lincoln RentWise Network, led by Lincoln Housing Authority, is to use certified trainers to offer the Nebraska RentWise program at no cost to individuals who want to become better tenants. Nebraska RentWise teaches the knowledge and skills to be a successful renter and the issues that lead to problems for tenants. Nebraska RentWise teaches participants how to secure and maintain safe and affordable rental housing. The six-module program covers topics such as how to take care of and maintain the rental unit; how to improve communication and reduce conflict between tenants and landlords; how to improve the rental experience, manage money, and information on legal rights and responsibilities. The titles to each of the modules are:

1. Managing Your Money
2. Communicating with Landlords and Neighbors
3. Finding a Place to Call Home
4. Getting Through the Rental Process

5. Taking Care of a Home
6. When You Move Out

Each module covers a broad range of topics to help participants become successful renters. The 12 hour curriculum uses lectures, workbooks, worksheets, demonstrations, and question & answer formats.

The Lincoln RentWise Network offers the six module educational series at least twice per month during both day and evening hours at a central location with city bus service. Lincoln Housing Authority provides coordination for registration, materials, interpreters, scheduling, tracking, and issuing certificates of completion.

B. BENCHMARKS, METRICS, AND IMPACT

The tenant education program, Nebraska RentWise, will assist low-income tenants in becoming more successful renters or housing assistance program participants. Their success as a renter will expand their housing opportunities as they improve upon their credit history and/or rental history. Several Lincoln landlords view the Nebraska RentWise education program as so valuable that they reward Nebraska RentWise graduates with incentives such as reduced rent or deposit, or give them special consideration on their rental application. Nebraska RentWise graduates benefit from these incentives. The incentive may provide a renter more opportunities to rent units that they once were unable to afford or where the landlord might have denied their application had they not completed the Nebraska RentWise program. This tenant education allows renters the ability make educated decisions about finding and maintaining affordable and suitable housing. The proactive nature of this tenant education program results in some Nebraska RentWise graduates becoming successful without needing housing assistance.

This activity was implemented for the full fiscal year using a combination of local foundation grant funds and federal funds under the broader uses of funds amendment.

The following data has been collected on Nebraska RentWise participants as of December 31, 2009.

Between August 2008 to December 2009, the Lincoln RentWise Network has provided the following services to renters.

- 806 renters in Lincoln registered to attend Nebraska RentWise.
- 442 renters in Lincoln attended Nebraska RentWise.
- 88.0% of the Nebraska Rentwise participants graduated from Nebraska RentWise.
- 58.8% of these Nebraska RentWise graduates applied for housing assistance.

Metric	Baseline FY 10 (April 2009 through March 2010)	Benchmark	Outcome FY 12 (April 2011 through March 2012)
Number of Registrants for NE Rentwise	887	1,100	1,516
Number of Registrants who Attended NE Rentwise	478	550	685 45 % (685/1516) Percentage of attendance from those who register in FY 12
Number\Percentage of those who attended that Graduated from NE RentWise	426 Graduated 89% Graduation rate	468 85% graduation rate	550 Graduated 80% graduation rate
Number\Percentage of NE Rentwise Graduates who applied for housing	331 applied for housing 78% graduates applied for housing assistance	374 80%	484 88%

Studies in the field of housing and the use of vouchers show that one of the biggest impediments to increasing housing choice, decreasing concentrated poverty and expanding housing opportunities is the knowledge base of the tenant, their understanding of the market place and their connections to the community. Every graduate of Nebraska Rentwise improves the knowledge base of low-income renters; thereby increasing housing choice.

LHA expended \$7,385.28 in federal funds for this initiative under the broader uses of funds amendment which was approved in September, 2011. The expenditures were for the period of October 1, 2011 to March 31, 2012.

C. CHALLENGES AND NEW STRATEGIES

A third RentWise training session on the third week of the month was added. This session is only offered every other month. This additional training session is taught by volunteers from Centerpointe staff at their facility. Centerpointe serves a specialized population who have a dual

diagnosis of mental illness and substance abuse. This special population attending the third week sessions has contributed to an overall decline in the RentWise graduation success rate. There tends to be a lot of instability surrounding their diagnosis, thus it is difficult for them to complete the program.

The number of Nebraska RentWise registrants in FY12 exceeded our benchmark by 37.8%. We added more registrants to the classes due to the “no show” rate increasing. We believe the “no-show” rate increased due to the increased time span between when a person registers and actually attends class, which is approximately 4 to 6 months. Adding additional classes has been discussed, but we are unable to staff or fund additional RentWise sessions at this time.

The demand for providing language interpreters has exceeded expectations and budget allocations. In an effort to consolidate interpreter costs, we are planning to conduct RentWise classes twice a year in specific languages that have high demands for interpreters. We are also researching equipment that allows an interpreter to speak into a device that is transmitted to a participant headset so more than two participants can receive translation service per translator. The Lincoln RentWise Network trained and certified an Arabic-speaking interpreter to teach RentWise twice a year to consolidate costs and improve the learning atmosphere for the RentWise participants. The network trained and certified a Spanish interpreter to teach RentWise twice a year in Spanish, and is seeking a Vietnamese interpreter to become certified to train RentWise in Vietnamese twice a year. For the current fiscal year, there are already requests for interpreters to assist with translation in 10 different languages. The average cost of an interpreter to complete the six module series is \$450.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

Not applicable

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Not Applicable

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

This MTW activity is authorized in Attachment D which authorizes the agency to combine public housing operating and capital funds under Section 9 of the US Housing Act of 1937 and voucher program funds provided under Section 8 of the US Housing Act of 1937 to provide housing assistance for low-income families and services to facilitate the transition to work on such terms and conditions as the agency may propose and the Secretary may approve.

Initiative 8

ACTIVITY: Resident Services Program

Resident Services Program (HCV Program)

Year Identified: November, 2010

Effective Date: October 1, 2011

Statutory Objectives:

- Reduce cost and achieve greater cost effectiveness in federal expenditures
- Increase housing choice for low income families

A. DESCRIPTION

Under the broader use of funds authority, Lincoln Housing Authority proposed to use combined MTW funds to support a resident services program at Crossroads House Apartments. It was proposed that, through an interlocal agreement, the resident services program would be operated by the Lincoln Area Agency on Aging (LAAA) to provide outreach, case management, service coordination, and supportive services to tenants who are frail elderly or disabled.

This activity serves only households under 80% AMI and is related to the MTW objective of increasing housing choices for low-income families by providing a supportive services program which will allow residents to remain independent and prevent premature or unnecessary placement in assisted living facilities or nursing homes. Avoiding these higher levels of care will also prevent or delay federal expenditures for these type of placements. Crossroads House Apartments is an elderly apartment complex with 58 one-bedroom units located in the heart of Lincoln's downtown, 1000 O Street, Lincoln, Nebraska. There is a need for case management and supportive services to allow elderly and disabled residents to remain independent and prevent premature or unnecessary institutionalization.

This program is modeled after HUD's Congregate Housing Services Program which LAAA (grantee) currently offers at LHA's Burke Plaza (91 units) and Mahoney Manor (120 units). All residents are eligible for outreach, case management and service coordination. Residents who are frail with 3 or more deficits in Activities of Daily Living (ADLs) or who are disabled are eligible for supportive services which include personal care, housekeeping, and transportation subsidy. Participation in services by residents is not mandatory and is at the option of the resident. Individual supportive services under the contract are limited by an amount established annually. For fiscal year 2011-2012, the cost of services per individual was established not to exceed \$2,000 per resident and the total cost of the program under the contract with LAAA was established not to exceed \$41,000.

The LAAA is responsible to maintain a Professional Assessment Committee (PAC) which consists of at least three individuals who review an assessment of each potential participant in supportive services to ensure each participant is an elderly person deficient in at least three ADLs

or is a disabled individual. The LAAA also provides the staffing of a service coordinator who is trained in aging process, elder services, disability services, program eligibility, drug and alcohol abuse by the elderly, mental health issues, and any other areas of concern.

The service coordinator does the following:

- a) Provides general case management and referral services to all potential participants in the program and provide referral to the PAC of those individuals who appear eligible for the program.
- b) Establishes professional relationships with relevant agencies and service providers in the community and develops a directory of providers for use by staff and program participants.
- c) Refers proposed participants to service providers in the community. Serves as staff to the Professional Assessment Committee and completes all paperwork necessary for the assessment, referral, case monitoring, and reassessment processes; implements the case plan developed by the PAC and agreed to by the program participant. Maintains necessary case files on each program participant, and provides files to PAC members upon request, in connection with PAC duties.
- d) Monitors the ongoing provision of services from community agencies and keeps the PAC and agencies informed of the progress of the participant.
- e) Educates program participants on such issues as application procedures, service availability, and program participant options and responsibilities.
- f) Assists in building informal support networks with neighbors, friends, and family.
- g) Performs a formal assessment of each potential elderly program participant's deficiencies in performing the Activities of Daily Living (ADL).
- h) Performs a regular assessment and updating of the supportive services plan of all participants
- i) Provides information and referral services, short-term casework, and care management resources for residents who are not eligible for supportive services. Coordinates the delivery of third party purchased supportive services for residents who are ineligible for the program supportive services in order to establish a continuum of care and assures access to necessary supportive services
- j) Performs other duties for case management and outreach as appropriate to the needs of the residents.

The LAAA contracts with qualified providers to furnish participants with supportive services including personal care, transportation, and housekeeping services. These three services will be provided and funded as part of the program.

MTW funds are used to provide reimbursement to LAAA under the interlocal agreement. Personnel costs for the service coordinator are reimbursed at 100% for .35 FTE to serve Crossroads House. Supportive services are reimbursed at 75% with the remaining 25% billed to the participant receiving services. As noted earlier, there is an annual limitation on individual supportive services to the program with an initial cap set at \$2,000 and adjusted annually as needed.

The resident services program is enhanced by the location of the downtown senior center located directly across the street from Crossroads House. This location affords easy access to the

programs operated by the LAAA at the senior center which include education, recreation, social activities, health activities, and nutritional programs including a daily noon meal. This location also affords easy access to the service coordinator office and program administration, also located at the senior center site.

B. BENCHMARKS, METRICS, AND IMPACT

This was a new activity for our 2011-2012 MTW Annual Plan. This activity was specifically tied to an MTW contract amendment for a broader use of federal funds. The contract amendment was approved by HUD on September 23, 2011.

Services under this initiative were effective October 1, 2011. The service coordinator from LAAA is providing service coordination and the Professional Assessment Committee (PAC) is reviewing and approving case plans. During the six month period of October 1, 2011 to March 31, 2012, there were 60 individuals residing at Crossroads House. There were 32 individuals who were frail elderly or disabled. Outreach was provided to all residents with 31 receiving ongoing case management. Nineteen individuals received one or more of the supportive services with funding.

Through service coordination, residents also receive assistance with services not funded under this program. The service coordinator spends much time explaining services and benefits to residents and families, communicating and problem solving with service agencies, physicians, and other health care providers and building managers. New problem situations arise regularly and they are addressed quickly. The service coordinator works with residents who are hospitalized or have temporary nursing home stays to plan for return home with supportive services.

The services increase housing choice by providing the choice to continue to live in an independent apartment and age in place. Typically, when individuals become more frail or disabled, they require a higher level of care and individuals often have little or no choice but to move to whatever assisted living or nursing home is available. With in-home support services, individuals are able to choose to continue to live independently. Low income applicants are attracted to this type of housing because it gives them the choice to continue to live independently because an array of services will be available as their needs change.

The services are cost effective by helping maintain individuals in their home and prevent unnecessary higher levels of care at substantial additional cost. Generally, the cost of higher levels of care is paid with Medicaid funds as the Crossroads House tenants do not have income, assets or insurance to cover the cost.

The Lincoln Area Agency on Aging provides an annual estimate of savings on federal expenditures that are achieved through this program. The cost savings are not direct savings on HUD expenditures but Medicaid savings. A preliminary or baseline estimate by LAAA placed the additional cost at \$135,501 if the residents were served in assisted living. Estimates for nursing home care would certainly be higher but the Area Agency on Aging stated that there are too many

variables in nursing home care to provide a reliable estimate.

Metric	Baseline	Benchmark	Outcome
Frail elderly or disabled individuals receive supportive services to maintain independence and choice	June 2010	Percentage of resident who are frail-elderly or disabled Percentage of eligible residents requesting services and who receive services	October 1, 2011 to March 31, 2012
	23 out of 58 residents (40%) are frail-elderly or disabled 40% of tenants are eligible for services	40% of tenant population is frail-elderly 100% of eligible persons requesting services will receive services	32 out of 60 residents (53%) are frail-elderly or disabled 53% of tenants are eligible for services 100% of eligible persons who requested services also received services

Cost of Resident Services Program	Baseline Projected Cost for FY 2010	Maintain cost of program at less than	Cost of Services October 1, 2011 to March 31, 2012
	\$37,000	\$41,000	\$17,974 for 6 months or an annualized rate of \$35,948 Actual 6 Month Costs: Service Coordinator cost = \$13,148 for .35 FTE Supportive Services cost = \$4,827
Number of residents at High Risk of Assisted Living or Nursing Home Placement – Greater Housing Choice Opportunity	Baseline November 2010	Maintain High Risk Residents in Independent Living with Support Services	Actual Number of High Risk Residents who were maintained in Independent Living October 1, 2011 to March 31, 2012
	9 Residents	9 Residents	12 Residents
Estimated cost savings by avoiding the next higher level of care (assisted living)	Baseline Estimated Medicaid Savings for FY 2010	Achieve an estimated Medicaid Savings Amount of not less than	Estimated Medicaid Savings for High Risk Residents if Maintained in Independent Living
	\$135,501	>\$135,000	\$165,778

The estimated Medicaid cost savings is 123% of the baseline. The estimates are prepared by LAAA and they take a very conservative approach to the estimate. For example, the estimate is based on Medicaid Waiver Assisted Living costs although some individuals may not be suitable or able to find assisted living and would be forced to a skilled nursing care facility at substantial additional cost.

C. CHALLENGES AND NEW STRATEGIES

Because of our long partnership with the LAAA in implementing the Congregate Housing

Services Program (CHSP) at two other buildings, this program is able to run in a quite similar manner. The experience of LAAA and cooperative relationship with LHA allowed for easy implementation of this initiative.

D. NEW INDICATORS OF ACTIVITIES STATUS AND IMPACT

No changes are planned.

E. DATA COLLECTION METHODOLOGY AND REVISIONS

Data is collected through the Professional Assessment Committee and case files. The Lincoln Area Agency on Aging provides data for the annual report including an estimated savings in Medicaid costs based on a case by case analysis of services received in the program, Medicaid waiver services, and the risk of entry into assisted living or nursing home if the program services were not available.

F. CHANGES IN AUTHORIZATION FROM ATTACHMENT C OR D

Not applicable

G. PROVISION OF THE ACT OR REGULATION THAT IS WAIVED

This MTW activity is authorized in Attachment D which authorizes the agency to combine public housing operating and capital funds under Section 9 of the US Housing Act of 1937 and voucher program funds provided under Section 8 of the US Housing Act of 1937 to provide housing assistance for low-income families and services to facilitate the transition to work on such terms and conditions as the agency may propose and the Secretary may approve.

VII. Sources and Uses of Funding

A. List planned versus actual sources (operating, capital, and HCV) and uses of MTW Funds. Provide a narrative description of any major changes from the approved plan:

Note: See Appendix B for Capital Fund Program

Financial Resources: Sources and Uses of Funds April 1, 2011 to March 31, 2012						
A. Planned versus Actual Sources and Uses of MTW Funds						
Sources of MTW Funds	2011-2012 Plan	2011-2012 Budget	2011-2012 Actual	Difference (Actual -Budget)	Explanation	Uses of Funds
Public Housing Operating Subsidy	\$430,000	\$487,580	\$406,964	(\$80,616)	Operating Subsidy Formula	Public Housing Operations
Public Housing Capital Grant	\$520,000	\$520,210	\$507,129	(\$13,081)	Capital Funds received during fiscal year	Public Housing Capital Improvements
Section 8 Housing Assistance	\$12,400,000	\$12,536,952	\$13,066,441	\$529,489	Actual Funding Proration was more than budgeted.	Section 8 Housing Assistance Payments
Section 8 Administrative Fees	\$1,570,000	\$1,903,350	\$1,658,489	(\$244,861)	Budget set at 100% of eligible admin; loss due to funding at less than 100%	Section 8 Administrative Costs
Section 8 Extraordinary Fees					N/A	
Section 8 Reserves						Broader uses of Funds: Nebraska Rent Wise Program \$18,000
Section 8 Reserves						Broader Uses of Funds: Resident Services Program at Crossroads House Apartments \$64,000

Public Housing Rental Income	\$1,040,000	\$1,098,030	\$1,111,535	\$13,505	Rental income is based on tenant income and occupancy rates	Public Housing Operations
Interest Income	\$59,000	\$20,340	\$26,979	\$6,639	Interest rates and investment amount higher than budgeted	Public Housing/HCV Operational Costs
Tenants	\$60,000	\$50,120	\$54,929	\$4,809	Charges for tenant damages were more than anticipated;	
Other Income	\$31,250	\$32,150	\$78,473	\$46,323	Forfeited tenant escrow accounts more than estimated	Public Housing/HCV Operational Costs
TOTAL MTW INCOME	\$16,110,250	\$16,648,732	\$16,910,939	\$262,207		

B. Planned versus Actual Sources and Uses of State, Local, & Non-MTW Funds						
Sources of Non-MTW Funds	2011-2012 Plan	2011-2012 Budget	2011-2012 Actual	Difference	Explanation	Uses of Funds
Section 8 Non-MTW	\$960,500	\$668,482	\$659,824	(\$8658)	NA	Housing Assistance Payments–Section 8 (Non-MTW) operational costs
Housing Choice Voucher FSS Grant	\$59,160	\$60,950	\$64,084	\$3,134	NA	Housing Choice Voucher FSS Coordinator
Section 8 Administrative Fees	\$37,000	\$20,430	\$20,156	(\$274)	Based on total unit months under lease	
Public Housing ARRA Funds					N/A	
Public Housing ROSS Grant	\$50,000	\$56,610	\$109,802	\$53,192	Received new grant for Elderly Service Coordinator	Public Housing FSS Coordinator and Elderly Service Coordinator

Home Funds	\$25,000	\$25,000	\$22,662	(\$2,338)	Based on Requests for security deposit assistance	Security Deposit Assistance
Rental Income	\$4,972,100	\$5,081,470	\$5,258,840	\$177,370	Slight rent increase and low vacancy	Operational Costs
Interest Income	\$225,000	\$257,330	\$314,338	\$57,008	Received more interest on note with tax credit project than anticipated	Operational Costs
Tenants	\$100,000	\$109,080	\$76,905	(\$32,175)	Fewer damages than estimated	
Other Income	\$27,500	\$35,050	\$33,645	(\$1,405)	Other income slightly less than budget	Operational Costs
Other Grants	\$24,000	\$45,000	\$35,751	(\$9,249)	Additional Grants obtained by Lincoln Housing Charities	Client Services
Direct Reimbursements	\$500,000	\$450,650	\$528,071	\$77,421	More direct costs reimbursed by tax credit projects managed by LHA	Reimbursement of Direct Expenses
TOTAL NON-MTW INCOME	\$6,980,260	\$6,810,052	\$7,124,078	\$314,026		

C. Planned versus Actual Sources & Uses -- Central Office Cost Center (COCC)						
COCC Activity	2011-2012 Plan	2011-2012 Budget	2011-2012 Actual	Difference	Explanation	Uses of Funds
Management Fee	\$1,170,000	\$1,178,880	\$1,226,421	\$47,541	Increase in HUD published fee amount	Central Office Operational Costs
Bookkeeping Fee	\$371,520	\$376,240	\$378,690	\$2,450	NA	Central Office Operational Costs
Asset Management Fee	\$130,000	\$130,780	\$137,160	\$6,380	NA	Central Office Operational Costs

Capital Improvement Fee	\$120,000	\$113,790	\$117,837	\$4,047	N/A	Central Office Operational Costs
Fee For Service	\$1,995,000	\$2,239,400	\$2,117,002	(\$122,398)	Fewer fees from services than estimated	Central Office Operational Costs
Other Income		\$1,500	\$13,318	\$11,818	Received \$10,000 donation	Central Office Operational Costs
Interest Income		\$2,440	\$4,241	\$1,801		Central Office Operational Costs
Total	\$3,786,520	\$4,043,030	\$3,994,669	(\$48,361)		
GRAND TOTAL - ALL	\$26,877,030	\$27,501,814	\$28,029,686	\$527,872		

D. If using a cost allocation or fee-for-service approach that differs the 1937 Act requirements, describe the actual deviations that were made during the Plan year:

No Deviations

Lincoln Housing Authority's cost allocation approaches comply with the 1937 Housing Act requirements.

E. List or describe planned versus actual use of single-fund flexibility:

Lincoln Housing Authority retains full authority to move MTW funds and project cash flow among projects, without limitation, under its asset management program. During FY 2012 LHA moved \$116,000 from MTW-HCV to MTW-Public Housing.

In September, 2011, HUD approved a Second Amendment to the Amended and Restated Moving to Work Agreement. The amendment gave LHA authority for use of funds beyond those uses specified in Sections 8 and 9 of the 1937 Act. LHA proposed and HUD approved two activities (Other Initiatives 7 and 8) in which LHA is able to conduct services programs for low-income households through use of the block grant.

F. Optional - List planned versus actual reserve balances at the end of the plan year.

Optional—not provided in this report

G. Optional - In plan appendix, provide planned versus actual sources and uses by AMP.

Optional—not provided in this report

The Lincoln Housing Authority (LHA) has adopted cost accounting and financial reporting methods that comply with OMB Circular A-87, OMB Circular A-133, and generally accepted accounting principles (GAAP). LHA's budgeting, accounting and financial management comply with the requirements of HUD's property-based/asset management requirements. LHA does

retain full authority to move MTW funds and project cash flow among projects, without limitation, under its asset management program.

LHA utilizes four methods for allocating costs to projects.

Direct Costs: Expenditures are matched as closely as possible to the various projects. Direct expenses, expenses that are clearly associated with a given project, are charged directly to that project.

Fee Approach: LHA assesses fees to the various projects for the purpose of operating a central office cost center. Each project pays management fees, bookkeeping fees, asset management fees, and grant management fees (as they pertain to each project) into the central office cost center. LHA utilizes the HUD published fee schedule.

Fee for Service Approach: The LHA maintains a central maintenance facility as many of its properties are scattered houses and duplexes located throughout the city. A work order is prepared for each job charging an hourly fee for actual time spent on the job. Material costs are also recovered on the job work order.

Indirect Cost Allocation: LHA allocates inspection and intake costs each month. Inspection and intake expenses are accumulated each month and allocated to the projects based on the projected number and type of inspections (for inspection costs) and the projected number of units leased (for intake costs).

VIII. Administrative

A. Description of progress on the correction or elimination of observed deficiencies cited in monitoring visits, physical inspections, or other oversight and monitoring mechanisms, if applicable

A site visit was conducted on November 1, 2011. No deficiencies were identified in this visit or at any other time during the fiscal year.

B. Results of latest Agency-directed evaluations of the demonstration as applicable

Not applicable

C. Performance and Evaluation Report for Capital Fund Activities not included in the MTW Block Grant

The following reports are included in Appendix B for the following grants:

NE26S002501-09	Final Performance and Evaluation Report
NE26P002501-10	Final Performance and Evaluation Report
NE26P002501-11	Revised Annual Statement—Revision #1
NE26P002501-12	Revised Annual Statement—Revision #1
NE002	Capital Fund Program—Five Year Action Plan

D. Certification that the Agency has met the three statutory requirements of: 1) assuring that at least 75 percent of the families assisted by the Agency are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

Appendix A

APPENDIX A

Agency Certification for the Statutory Requirements

HOUSING AUTHORITY
OF THE
CITY OF LINCOLN, NEBRASKA

RESOLUTION NO. 814

CERTIFICATION OF COMPLIANCE WITH
HUD MOVING TO WORK STATUTORY REQUIREMENTS

WHEREAS, the Housing Authority of the City of Lincoln, Nebraska was selected by the U. S. Department of Housing and Urban Development to participate in the Moving To Work Demonstration program; and

WHEREAS, the Housing Authority of the City of Lincoln, Nebraska has entered into a written agreement with the U. S. Department of Housing and Urban Development outlining our participation requirements and approved MTW initiatives; and

WHEREAS, the written agreement with HUD requires that the Housing Authority of the City of Lincoln meet the following MTW statutory requirements:

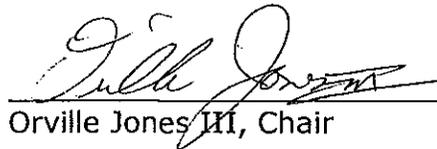
- 1) assuring that at least 75 percent of the families assisted are very low-income families;
- 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
- 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration; and

WHEREAS, the Housing Authority of the City of Lincoln must certify to HUD that LHA has met the statutory requirements;

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the Housing Authority of the City of Lincoln that LHA has met all statutory requirements outlined in the written Moving To Work agreement with HUD; and

BE IT FURTHER RESOLVED that the Executive Director is hereby authorized to execute any and all documents submitting this approved certification resolution to HUD.

Dated this 14th day of May, 2012.


Orville Jones III, Chair

ATTEST:


Larry G. Potratz, Secretary

APPENDIX B

Annual Statement/Performance and Evaluation Report

for the following grants:

NE26P002501-09

(Final Performance and Evaluation Report)

NE26P002501-10

(Final Performance and Evaluation Report)

NE26P002501-11

(Revised Annual Statement—Revision #1)

NE26P002501-12

(Revised Annual Statement—Revision #1)

Capital Fund Program—Five Year Action Plan

Final Performance and Evaluation Report

NE26P002501-09

AK ✓

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant	
PHA Name:		Capital Fund Program Grant No: NE26P02501-09		2009	
Housing Authority of the City of Lincoln		Replacement Housing Factor Grant No:		FFY of Grant Approval:	
Date of CFFP:				2009	
Type of Grant		Revised Annual Statement (revision no:)		Total Actual Cost ¹	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Original	Revised ²	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$53,319	\$52,447	\$52,447	\$52,447
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$50,000	\$29,941.10	\$29,941.10	\$29,941.10
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	\$403,000	\$442,087.90	\$442,087.90	\$442,087.90
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization of Debt Service paid by the PHA				
18ba	9000 Collateralization of Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	\$26,876	0	0	0
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$533,195	\$524,746	\$524,746	\$524,746
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	0	0	0	0

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

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary	
PHA Name: Housing Authority of the City of Lincoln	Grant Type and Number Capital Fund Program Grant No. NE26P002501-09 Replacement Housing Factor Grant No: Date of CFFP: _____
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Final Performance and Evaluation Report Total Estimated Cost Revised Total Actual Cost Signature of Executive Director <i>Denny A. Davis</i> Date 10/17/2011 Signature of Public Housing Director <i>[Signature]</i> Date 11/7/11 Obligated Expended

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part II: Supporting Pages									
PHA Name: Housing Authority of the City of Lincoln		Grant Type and Number Capital Fund Program Grant No: NE26P002501-09 CFFP (Yes/No):			Federal FFY of Grant: 2009				
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work	
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²		
	Administration	1410		53,319	52,447	52,447	52,447	Complete	
	Fees and Costs	1430		50,000	29,941.10	29,941.10	29,941.10	Complete	
	Remodel Bathrooms I	1460	80	225,000	379,742.47	379,742.47	379,742.47	Complete	
	Remodel Bathrooms II	1460	40	0	35,670.61	35,670.61	35,670.61	Complete	
	Replace Concrete	1460		6,000	12,043	1,369.52	1,369.52	Complete	
	Replace Retaining Walls	1460		12,000	0	0	0	Moved	
	Replace Concrete	1460		6,000	1,617.54	1,617.54	1,617.54	Complete	
	Install AC Access	1460		38,000	3,256	3,256	3,256	Complete	
	Replace Concrete	1460		6,000	1,359.29	1,359.29	1,359.29	Complete	
	Replace Concrete	1460		0	354.71	354.71	354.71	Complete	
	Replace Concrete	1460		6,000	1,542.86	1,542.86	1,542.86	Complete	
	Install Retaining Walls	1460		20,000	0	0	0	Moved	
	Replace Concrete	1460		6,000	0	0	0	Moved	
	Replace Decks	1460		22,000	0	0	0	Moved	
	Replace Concrete	1460		6,000	17,174.90	17,174.90	17,174.90	Complete	
	Repair Foundations	1460		26,876	0	0	0	Moved	
	Contingency	1502		26,876	0	0	0	Changed	

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

² To be completed for the Performance and Evaluation Report.

Final Performance and Evaluation Report

NE26P002501-10

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Part I: Summary		Grant Type and Number		FFY of Grant: 2010	
PHA Name: Housing Authority of the City of Lincoln, Nebraska		Capital Fund Program Grant No: NE26P002501-10		FFY of Grant Approval:	
Date of CFPP:		Replacement Housing Factor Grant No:			
Type of Grant	<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Final Performance and Evaluation Report		
Line	Summary by Development Account	Total Estimated Cost	Obligated	Total Actual Cost ¹	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	52,021	52,021	52,021	52,021
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	31,500	41,461.50	41,461.50	41,461.50
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	432,300	426,727.50	426,727.50	426,727.50
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 08/31/2011

Part I: Summary		FFY of Grant: 2010			
PHA Name: Housing Authority of the City of Lincoln, Nebraska	Grant Type and Number Capital Fund Program Grant No. NE26P002501-10 Replacement Housing Factor Grant No. Date of CFFP:	FFY of Grant Approval:			
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	0	0	0	0
20	Amount of Annual Grant: (sum of lines 2 - 19)	520,210	520,210	520,210	520,210
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	28,800	0	0	0
Signature of Executive Director		Date		Signature of Public Housing Director	
<i>Dany A. Brax</i>		5/8/2012			

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 08/31/2011

Part II: Supporting Pages		Federal FFY of Grant: 2010									
PHA Name: Housing Authority of the City of Lincoln, Nebraska		Grant Type and Number Capital Fund Program Grant No: NE26P002501-10 CFPP (Yes/ No): Replacement Housing Factor Grant No:									
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work			
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²				
HA/WIDE	ADMINISTRATION	1410		52,021	52,021	52,021	52,021	COMPLETE			
HA/WIDE	FEES & COSTS	1430		31,500	41,461.50	41,461.50	41,461.50	COMPLETE			
002 MMA	UPDATE/REPLACE BUILDING COMPACTOR	1460	1	19,500	0	0	0	MOVED			
002 MMA	REMODEL BATHROOMS PHASE II	1460	40	0	185,659.05	185,659.05	185,659.05	COMPLETE			
004 HAN	REPLACE SIDING & BUILDING SILL PLATE	1460	31	0	229,375.02	229,375.02	229,375.02	COMPLETE			
004 HAN	REPLACE SIDING PHASE II	1460	17	0	11,693.43	11,693.43	11,693.43	COMPLETE			
005 LAR	REPLACE A/C	1460	24	28,800	0	0	0	MOVED			
013 F39	REPAIR FOUNDATIONS	1460	3	0	0	0	0	MOVED			

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

² To be completed for the Performance and Evaluation Report.

Revised Annual Statement

Revision #1

NE26P002501-11

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

2 87%
 3 74%
 5/10/08 MTW
 9/08
 920 PH
 2936 Sect 8
 MTW 2011 Plan
 Expires 4/30/2011

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226

Part I: Summary

PHA Name: Housing Authority of the City of Lincoln, NE

Grant Type and Number: Capital Fund Program Grant No: NE26P002501-11

Replacement Housing Factor Grant No: [Blank]

Date of CFFP: [Blank]

FFY of Grant: 2011

FFY of Grant Approval: 2011

Line	Type of Grant	Original	Total Estimated Cost		Total Actual Cost ¹
			Revised ²	Obligated	
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	52,021	44,540		
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	40,000	40,000		
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	403,000	360,300		
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2011	
PHA Name: Housing Authority of the City of Lincoln, NE	Grant Type and Number Capital Fund Program Grant No: NE26P002501-11 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2011	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Reserve for Disasters/Emergencies		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)	25,189	564
20	Amount of Annual Grant: (sum of lines 2 - 19)	520,210	445,404
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Date	Date
<i>[Signature]</i>		7/21/2011	AUG 03 2011
Signature of Public Housing Director			
<i>[Signature]</i>			

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

Part II: Supporting Pages		Federal FFY of Grant: 2011						
PHA Name: Housing Authority of the City of Lincoln, NE		Grant Type and Number Capital Fund Program Grant No: NE26P002501-11						
Development Number Name/PHA-Wide Activities		CFFP (Yes/No): Replacement Housing Factor Grant No:						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
HA/WIDE	Administration	1410		52,021	44,540			
HA/WIDE	Fees & Costs	1430		28,000	28,000			
002 MMA	Fees & Costs Design Work	1430		12,000	12,000			
88% physical	Paint Halls & Floors	1460		13,000	13,000			
	Replace Common Area Floor Covers	1460		27,000	27,000			
	Replace Building Compactor	1460		20,000	20,000			
	Replace Mechanical Pipes 1 st Floor	1460		90,000	90,000			
003 HALL	Replace Retaining Walls	1460	23	12,000	-0-			
	Replace Concrete	1460	12	18,000	9,000			
004 HAN	Replace Concrete	1460	12	12,000	6,000			
	Replace Siding Phase II	1460	17	-0-	135,000			
005 LAR	Replace Concrete	1460	9	8,000	4,000			
006 PED	Replace Concrete	1460	10	9,000	4,500			
009 P30	Replace Retaining Walls	1460	8	20,000	-0-			
011 A12	Replace Concrete	1460	12	12,000	6,000			
013-F39	Repair Foundations	1460	2	50,000	23,000			
	Replace Concrete	1460	22	28,000	17,000			
	Replace Roofs	1460	1	84,000	5,800			
HA/WIDE	Contingency	1502		25,189	564			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement

² To be completed for the Performance and Evaluation Report.

Revised Annual Statement

Revision #1

NE26P002501-12

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

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: NE26P002501-12 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2012 FFY of Grant Approval:		
Type of Grant	<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report		Total Actual Cost ¹	
Line	Summary by Development Account		Original	Revised ¹	Obligated	Expended
1	Total non-CFF Funds					
2	1406 Operations (may not exceed 20% of line 21) ³					
3	1408 Management Improvements					
4	1410 Administration (may not exceed 10% of line 21)		44,540	39,482		
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs		38,000	32,000		
8	1440 Site Acquisition					
9	1450 Site Improvement					
10	1460 Dwelling Structures		352,864	319,459		
11	1465.1 Dwelling Equipment--Nonexpendable					
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment					
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs					
17	1499 Development Activities ⁴					

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

Part I: Summary		FFY of Grant: 2012	
PHA Name: Housing Authority of the City of Lincoln, Nebraska	Grant Type and Number Capital Fund Program Grant No: NE26P002501-12 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)	10,000	3,888
20	Amount of Annual Grant:: (sum of lines 2 - 19)	445,404	394,829
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures	30,000	35,000
Signature of Executive Director		Signature of Public Housing Director	
<i>Jerry Adams</i>		<i>[Signature]</i>	
Date		Date	
2-28-2012			

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

Part II: Supporting Pages		Federal FFY of Grant: 2012						
PHA Name: Housing Authority of the City of Lincoln, Nebraska		Grant Type and Number Capital Fund Program Grant No: NE26P002501-12 CFFP (Yes/No): Replacement Housing Factor Grant No:						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
HA/Wide	Administration	1410		44,540	39,482			
HA/Wide	Fees and Costs	1430		38,000	32,000			
002 MMA	Replace Hall Lights	1460		30,000	35,000			
	Update Security System	1460		20,000	28,000			
	Repair Concrete	1460		3,864	3,864			
	Piping Common Areas	1460		0	73,595			
003 HALL	Replace Retaining Walls	1460		12,000	12,000			
	Repair Concrete	1460		9,000	9,000			
004 HANSEN	Repair Retaining Walls	1460		5,000	5,000			
	Repair Concrete	1460		10,000	10,000			
005 LAR	Repair Concrete	1460		4,000	4,000			
006 PED	Replace Retaining Walls	1460		11,000	11,000			
	Repair Concrete	1460		7,000	7,000			
009 P-30	Replace Retaining Walls	1460		20,000	20,000			
	Repair Concrete	1460		7,000	7,000			
011 A-12	Replace Retaining Walls	1460		12,000	12,000			
	Repair Concrete	1460		7,000	7,000			
013 F-39	Roofs	1460		48,000	14,000			
	Water Taps	1460		80,000	14,000			

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

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program							Federal FFY of Grant: 2012
PHA Name: Housing Authority of the City of Lincoln, Nebraska							
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹		
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date			
HA/WIDE ADM	12/31/2014		12/31/2015				
HA/WIDE FEES	12/31/2014		12/31/2015				
002 MMA	12/31/2014		12/31/2015				
003 HALL	12/31/2014		12/31/2015				
004 HANSEN	12/31/2014		12/31/2015				
005 LARSON	12/31/2014		12/31/2015				
006 PEDERSON	12/31/2014		12/31/2015				
009 P-30	12/31/2014		12/31/2015				
011 A-12	12/31/2014		12/31/2015				
013 F-39	12/31/2014		12/31/2015				

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Capital Fund Program

Five Year Action Plan

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Part I: Summary (Continuation)

PHA Name/Number Housing Authority of the City of Lincoln, Nebraska (NE002)		Locality (City/county & State) Lincoln, Nebraska		Revision No:	
Development Number and Name	Work Statement for Year 1 FFY _____	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
	Annual Statement				
HA/Wide Admin.	44,540	44,540		44,540	44,540
HA/Wide Fees and Costs	39,000	39,000		39,000	38,000
002 MMA	98,000	242,000		54,000	110,000
003 HALL	7,000			72,500	6,900
004 HANSEN	6,000	72,000		80,464	14,400
005 LAR	105,000			45,600	7,200
006 PED	93,000	36,000		18,000	55,200
009 P-30	32,000			59,000	117,000
011 A-12	5,000			4,800	46,800
013 F-39	5,864			16,500	
	Subtotal	434,404	433,540	434,404	440,040
HA/Wide Contingency		10,000	11,864	10,000	5,364

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Part II: Supporting Pages – Physical Needs Work Statement(s)

Work Statement for Year 1 FFY	Work Statement for Year : 4 FFY 2015			Work Statement for Year: 5 FFY 2016		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	HA/WIDE Admin.		44,540	HA/WIDE Admin.		44,540
	HA/WIDE Fees & Costs		39,000	HA/WIDE Fees & Costs		38,000
	002 MMA Washers & Dryers		10,000	002 MMA Elevator Update		40,000
	Emergency Call System		40,000	Community Room Remodel		70,000
	Concrete		4,000	Sec. 504 Common Areas		5,000
	003 HALL Attic Insulation		9,200	003 HALL Blinds		6,900
	Decks		28,800	CO Monitors		1,200
	Replace AC		34,500	004 HAN Blinds		14,400
	004 HAN Furnaces		72,000	CO Monitors		2,400
	Concrete		8,464	005 LAR Blinds		7,200
	005 LAR Attic Insulation		9,600	Sec. 504 Compliance		12,000
	Replace AC		36,000	CO Monitors		1,200
	006 PED Attic Insulation		9,600	006 PED Interior Doors		48,000
	Decks		8,400	Blinds		7,200
	009 P-30 Attic Insulation		12,000	CO Monitors		1,200
	Replace AC		47,000	009 P-30 Roofs		73,000
	011 A-12 Attic Insulation		4,800	Blinds		9,000
	013 F-39 Brmst. Windows		16,500	CO Monitors		1,500
	HA/WIDE Contingency		11,000	Sec. 504 Compliance		4,000
				011 A-12 Roofs		43,200
				Blinds		3,600
				CO Monitors		600
				013 F-39 Sec. 504		4,000

APPENDIX C

LHA Request and HUD Approval Letters

Regarding

VASH under MTW

Commissioners:
 Orville Jones, III, Chair
 Dallas McGee, Vice Chair
 Jan Gauger
 Georgia Glass
 Joy Ward



Lincoln Housing Authority

Executive Director
 Larry G. Potratz

Equal Housing Opportunity

P.O. Box 5327 • 5700 R Street • Lincoln, Nebraska 68505

September 8, 2011

Milan Ozdinec, Deputy Assistant Secretary
 U.S. Department of Housing and Urban Development
 Office of Public Housing and Voucher programs
 451 7th Street, SW
 Washington, DC 20410

SUBJECT: MTW flexibility for VASH participants

Dear Mr. Ozdinec:

The Housing Authority of Lincoln, Nebraska is proposing to operate the HUD Veterans Affairs Supportive Housing (VASH) program in accordance with our approved Moving to Work (MTW) standard agreement. Based on the success of our MTW policies, we would like to expand them to VASH participants.

The following table is a summary of LHA's MTW initiatives for the voucher program, along with our assessment as to whether or not the veteran would benefit from the MTW policy and if the policy has a conflict with VASH program policies.

MTW Initiative	VASH appropriate	In conflict with VASH policies
1. Coincide inspection due dates with annual re-exam dates. Biennial inspections for units that pass HQS at first inspection visit.	Veterans and VA case managers would benefit through the reduction in administrative work. It is easier to case manage when the inspections and annual re-examination dates coincide. Veterans and their landlords should be rewarded for maintaining their units to meet HQS standards.	
2. Biennial re-examinations for elderly and disabled	Veterans and VA case managers would benefit by the reduced administrative work and redundancy of meeting with PHA worker. Most VASH households are disabled thus this policy would reduce the veteran's PHA office visits to one in a two year period.	

Telephone: (402) 434-5500

Fax: (402) 434-5502

(TDD) Telecommunication Device for Deaf: 1-800-545-1833 Ext. 875

Email: Info@L-Housing.com

www.L-Housing.com

3.	Asset Income and verifications- self-certification for assets under \$5,000 and assets over \$5,000 calculated at 2% of the face value	Veteran would benefit from the reduced verification standards as eligibility decisions could be completed faster.	
4.	Verifications- Accepting the last issued Social Security statement rather than requiring statement to be issued within 60 days.	Veteran would benefit from the reduced verification standards as eligibility decisions could be completed faster.	
5.	Earned Income Disregard, imputed welfare income and student earned income exclusions.	Veteran households tend to not be impacted by these policies.	
6.	Standard utility allowance designated by bedroom size only. No utility reimbursements issued.	Veterans and VA case managers would benefit from the policy simplification by understanding how to locate more affordable units. Tenant rent portions would reduce for some veterans, specifically for those who reside in units where utilities are included in the rent.	
7.	TTP calculated at 27% of gross income	Veteran would benefit as this would reduce the TTP of all current veteran households.	
8.	Maximum initial rent can not exceed 50% of monthly adjusted income.	Veterans would benefit through more housing choice opportunities.	
9.	90 day delay in interims for reducing employment income without good cause.		Exempt VASH participant from the policy as they are working in a self sufficiency program with the VA case manager.
10.	Income targeting will not be used in new admissions.		Not applicable- VA referrals controls the new admissions selection.
11.	Restricted Portability		Not applicable- VASH has it's own set of portability restrictions.

12.	Minimum Rent of \$25		Exempt- Veteran would be eligible for the hardship clause.
13.	Minimum Earned Income- work requirement of 25 hours per week @ minimum wage for adults who do not qualify for exemption.		Exempt VASH participant from the policy as they are working in self sufficiency program with VA case manager.

As noted in the table above, most of the initiatives would not conflict with the regulations or the intentions of the VASH program. Rather, these MTW initiatives would actually make the program administration more efficient for our agency and the Veteran's Affairs (VA) plus benefit the veteran served by the Lincoln Housing Authority (LHA). LHA has reviewed the above policy changes with the VA case manager and Program Coordinator who also support the proposed policy changes.

LHA is also requesting to submit all HUD-VASH participant 50058 records via the MTW-50058 to ensure all 50058 records are accepted and recorded properly in the PIH information Center (PIC) system.

We want to assure your office that LHA would at all times follow any and all applicable rules that are specific to the VASH program such as administering the program in accordance with HUD-VASH operating requirements, maintaining separate tracking of all HUD-VASH funds, using special program codes in the PIC system and continuing to report HUD-VASH separately from MTW vouchers. If you have any questions about this proposal please feel free to contact Seanna Collins, Tenant Based Housing Manager at (402) 434-5505 or seanna@l-housing.com.

Thank you for considering our request. We look forward to hearing back from you so we may start implementing these activities for our veterans as soon as possible.

Sincerely,



Larry G. Potratz
Executive Director

.cc Emily Cadik, MTW HUD Coordinator
Michael Dennis, HUD Headquarters
Laure Rawson, HUD Headquarters
Phyllis Smelkinson, HUD Headquarters



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

ASSISTANT SECRETARY FOR
PUBLIC AND INDIAN HOUSING

September 21, 2011

Mr. Larry G. Potratz
Executive Director
Lincoln Housing Authority
P. O. Box 5327
5700 R Street
Lincoln, NE 68505

Dear Mr. Potratz:

On September 8, 2011, you submitted a request on behalf of the Lincoln Housing Authority (LHA) to establish alternative requirements to Section i. of the *Implementation of the HUD-VA Supportive Housing Program (Operating Requirements)* published in the Federal Register on May 6, 2008. This request included all Moving to Work (MTW) provisions that apply to the voucher program.

Section i. of the Operating Requirements states that HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers must be administered in accordance with the Operating Requirements and are not eligible for fungibility under MTW agreements. Also, HUD-VASH vouchers must be reported on separately from vouchers under the agency's MTW Agreement.

Specifically, LHA requested to operate its 60 HUD-VASH vouchers in accordance with all applicable provisions of its MTW Agreement. LHA believes that administering all HUD-VASH vouchers in accordance with its MTW Agreement would simplify administration of the program and benefit the veterans.

In reviewing LHA's request, the standard applied is a straightforward one: HUD-VASH assistance must always be administered in accordance with the Operating Requirements, the statutory provisions governing this assistance (in particular, the requirements contained in the applicable Appropriations Act), and any other HUD-VASH voucher requirements (i.e., any supplemental requirements that are established in addition to those stated in the Operating Requirements). If a MTW Agreement provision is inconsistent with the HUD-VASH requirements, the latter requirements prevail with respect to administration of these vouchers.

LHA completed an assessment of 13 MTW initiatives that would be applied to the HUD-VASH voucher program. The Department agrees with LHA's assessment that the initiative would either benefit the veteran or not be applied. Therefore, it has been concluded that LHA's MTW initiatives do not conflict with the HUD-VASH voucher requirements (particularly those involving eligibility, admission and continued assistance for HUD-VASH veterans). Given this determination, and the fact that it should have no adverse impact on HUD-VASH families since hardship exemptions are provided, LHA may administer HUD-VASH vouchers under the MTW voucher provisions.

The approval to allow LHA to administer its HUD-VASH vouchers in accordance with its MTW Agreement does not extend to HUD-VASH program funding. HUD-VASH voucher funding is not eligible for fungibility and the funds must be accounted for separately in the Voucher Management System (VMS).

Please note that in accordance with Sections II.i. and III of the Operating Requirements, MTW agencies are required to use the regular form HUD-50058 for HUD-VASH families when reporting into the Public and Indian Housing Information Center (PIC), not the form HUD-50058 MTW. At your request, since LHA will be operating its HUD-VASH program in accordance with its MTW Agreement, LHA may report these families on the form HUD-50058 MTW since the rent calculations would be rejected on the regular form HUD-50058.

Your HUD-VASH program will be monitored through PIC reporting, VMS and information provided by the Department of Veterans Affairs. HUD reserves the right to withdraw or modify this approval at any time if, in HUD's determination, the MTW alternative requirements are having a negative impact on the veterans receiving assistance under the HUD-VASH program.

Should you wish to discuss this matter further, please contact Phyllis Smelkinson, Housing Program Specialist, Housing Voucher Management and Operations Division, at (202) 402-4138.

Sincerely,

Sr Sandra B. Henriquez
Sandra B. Henriquez
Assistant Secretary

APPENDIX D

**Request for Inspection
and
Unit Information
Form
for the
Statutory Requirements**

**Request for Inspections and Unit Information
Moving to Work Housing Choice Voucher Program**



P.O. Box 5327 • 5700 R Street • Lincoln, NE 68505
Phone: (402) 434-5500 • Fax: (402) 434-5502

Owner:

Thank you for your interest in working with Lincoln Housing Authority to provide affordable housing.

Please complete and return the attached form with your potential tenant.

The form may be mailed, hand delivered, emailed, or faxed.

Return the form to:
Lincoln Housing Authority (LHA)
5700 R Street
Lincoln, NE 68505

Fax: (402) 434-5502
Email form to: JanetL@l-housing.com

An inspection of your unit will be scheduled once we receive the completed form. At the time of the appointment our inspector will determine if the unit meets minimum Housing Quality Standards (HQS) and the proposed rent is acceptable within the current market conditions.

If you have any questions about this form, the inspection or the process to participate as an owner with the Moving to Work Housing Choice Voucher program, please feel free to contact the Inspections Department at (402) 434-5522.

Owner Information Only

Lease Information

After the unit passes inspection and before LHA can approve the Housing Assistance Payment (HAP) contract with the owner, the owner must provide LHA a copy of the signed lease with the tenant.

The following items are required to be disclosed in the lease.

1. **Owner/Landlord** name and **Tenant(s)** name
2. **Contract Rent** (as approved by the inspector).
3. **Address** of the unit including any apartment number.
4. **The term of the lease** must match the HAP contract. The term must be for a 12 month period but not more than 12 months. Example lease starts on 01-15-12, then it must end 12-31-12.
5. **Renewal terms.** Will the lease continue month-to-month or year-to-year?
6. **Utilities.** State what utilities the owner will provide and what utilities the tenant will provide.
7. **Appliances.** State what appliances are provided by the owner such as stove, refrigerator, dishwasher, washer and dryer and etc.
8. **Signatures** by both the tenant and owner/property manager.

The HUD tenancy addendum will be attached to your lease once LHA approves the Housing Assistance Payment contract with you.

Payment Information

After the unit passes inspection, LHA will mail or email the owner a Housing Assistance Payment (HAP) contract. The owner will return the signed contract with their signed lease for LHA's approval. Once LHA approves the contract and lease, the payment will be issued to the owner via direct deposit. All Housing Assistance payments made to the owner is reported to the Internal Revenue Service (IRS) as indicated on the W-9 on file with LHA.

Please note: The owner (including a principal or other interested party) cannot be the parent, child, grandparent, grandchild, sister or brother of any member of the family unless LHA has determined (and has notified the owner and the family of such determination) that approving the lease of the unit, notwithstanding such a relationship, would provide reasonable accommodation for a family member who is a person with disabilities.

Inspection Incentive

Typically, LHA is required to inspect each assisted unit on a yearly basis. The incentive is if your unit passes inspection at the first inspection and does not require additional items to be rechecked at a later date, then LHA will skip the following year's required annual inspection.



P.O. Box 5327 • 5700 R Street • Lincoln, NE 68505
Phone: (402) 434-5500 • Fax: (402) 434-5502

The entire form must be completed and returned.

Office - BSC Only	Inspection Date: _____
	Time: _____
	Inspector: _____
	Tenant name: _____

Unit Information

Address of Unit to be rented

Street Address	Apartment #	Zip Code
----------------	-------------	----------

What are you proposing to charge for rent?

Unit information

Rent Amount?	Date unit available for inspection?	<input type="checkbox"/> # of bedrooms	<input type="checkbox"/> Year constructed
--------------	-------------------------------------	--	---

Unit Type: Check one

- Apartment
 Duplex
 House
 Town House/Row House
 Mobile Home
 Tri-plex

Who will be responsible to pay for the following utilities?

The tenant can be responsible any utilities provided to the unit as long as the utility is metered separately from other tenants and common areas.

Check box	Who pays?	Fuel type?
Heating	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric <input type="checkbox"/> Other _____
Cooling	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric <input type="checkbox"/> Other _____
Other Electric	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric <input type="checkbox"/> Other _____
Cooking	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric <input type="checkbox"/> Other _____
Water Heating	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	<input type="checkbox"/> Natural gas <input type="checkbox"/> Electric <input type="checkbox"/> Other _____
Water/Sewer	<input type="checkbox"/> Tenant <input type="checkbox"/> Owner	
Trash collection	<input checked="" type="checkbox"/> Owner: Lincoln Municipal Code	

Who will be responsible to provide the following appliances?

Check box	Who provides?	What utility does it use?
Range/Stove	<input type="checkbox"/> Owner <input type="checkbox"/> Tenant	<input type="checkbox"/> Gas <input type="checkbox"/> Electric
Refrigerator	<input type="checkbox"/> Owner <input type="checkbox"/> Tenant	

Please check the box, if the owner will provide the following

- Dishwasher
 Disposal
 Washer
 Dryer
 Microwave
 Garage

Are you related to any household member who will be residing in the unit? Yes No

If yes, how are you related? _____

Is this unit federally subsidized by another program? Yes No

If yes, check the box that indicates the type of subsidy.

- Home
 Section 202
 Section 221(d)(3)(BMIR)
 Tax Credit
 Section 236 (Insured and noninsured)
 Section 515 Rural Development
 Other _____

Indicate the number of units in the building or apartment complex

(If 5 or more units, please complete the following comparison.)

Provide three (3) comparisons of contract rent for any "unassisted" units that are similar to the unit listed above, i.e. same bedroom size, and located within the same premise. Start with comparable units with lowest rent first.

Address and unit number	Rent amount	Date lease/rent started



Please note that LHA has not screened the family's behavior or suitability for tenancy. Screening is the owner's own responsibility.

Tenant and Owner Representative By signing this form, you certify the information given to Lincoln Housing Authority is accurate and complete to the best of your knowledge and belief.

Print or Type Name of Owner/Owner Representative		Print or Type Name of Household Head	
Signature		Signature (Household Head)	
Business Address (street, city, state and zip)		Present Address of Family (street, apartment no., city, state, & zip)	
Telephone	Date (mm/dd/yyyy)	Telephone Number	Date (mm/dd/yyyy)
Owner or property manager Email address			

Check box if you do not want to receive contract and other documents through email

Attention Owner/Manager: Check Proceeds will be reported to the IRS as indicated on the W-9 on file with LHA. Please complete the following as it appears on the W-9 on file with Lincoln Housing Authority.

Owner Name:

Owner Social Security Number or Federal ID number:

ESTIMATE ONLY!

If Rent is equal to or exceeds \$ _____ (target rent) then the Maximum Payment from LHA will be \$ _____.

Final payment determination is made after contracts are approved by LHA.

Move-In Date & Assistance Start Date

The **owner** and **tenant** decide when the tenant can move into the unit; LHA recommends the tenant waits to move into the unit until after the unit has passed inspection.

Housing Assistance cannot start prior to _____, the date the unit passes inspection or the date the tenant moves into the unit, whichever occurs last.

Tenant Information

Tenant/Applicant name _____ #SSN _____

_____ Voucher BR Size _____ Family Size Minors under 6 years old: Yes No

Next Annual Re-exam to be completed by _____

Housing Representative _____ Payment Standard _____ Target rent _____

**Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards
- Lead Warning Statement**

Housing built before 1978 may contain lead-based paint. Lead from paint chips and dust can pose health hazards if not taken care of properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing landlords must disclose the presence of known lead-based paint and lead-based paint hazards in the dwelling. Lessees must also receive a Federally approved pamphlet on lead poisoning prevention.

Owner please complete with tenant or provide a copy of your lead-based paint disclosure statement

Non-applicable - Unit was built after 1978 (If you checked box, skip to Certification of Accuracy Section)

Lessor's (Owner) Disclosure (Owner Initial where applicable)

Initial _____ (a) Presence of lead-based paint or lead-based paint hazards (check one below):
 Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

 Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

Initial _____ (b) Records and reports available to the lessor (check one below):
 Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).
 Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Lessee's (Tenant) Acknowledgment (Tenant initial where applicable)

Initial _____ (c) Lessee has received copies of all information listed above.
Initial _____ (d) Lessee has received the pamphlet Protect Your Family from Lead in Your Home.

Agent's Acknowledgment (Agent initial if applicable)

Initial _____ (e) Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4852(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information provided by the signatory is true and accurate.

Lessor (Owner) _____ Date _____

Lessee (Tenant) _____ Date _____