

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



**MOVING TO WORK**

**ANNUAL PLAN**

***Fiscal Year 2025-2026***

Public Hearing: December 12, 2024

Approval by Board of Commissioners: January 9, 2025

Submitted to HUD: January 15, 2025

HUD Comments: February 20, 2025

Resubmitted to HUD: March 13, 2025

Approved by HUD: March 18, 2025



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

OFFICE OF PUBLIC AND INDIAN HOUSING

March 18, 2025

Mr. Chris Lamberty  
Executive Director  
Lincoln Housing Authority  
5700 R Street  
Lincoln, NE 68505

Subject: Approval of Lincoln Housing Authority FY 2026 Annual Moving to Work Plan

Dear Mr. Lamberty:

The U.S. Department of Housing and Urban Development has completed its review of Lincoln Housing Authority's (LHA) FY 2026 Annual Moving to Work (MTW) Plan, which was initially submitted on January 15, 2025, and resubmitted per HUD's comments on March 13, 2025. I am pleased to inform you that LHA's FY 2026 Annual MTW Plan, as submitted on March 13, 2025, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local, non-traditional activities in compliance with PIH Notice 2011-45. In providing assistance to families under programs covered by this Plan, LHA must comply with the rules, standards and policies established in the Plan, and documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Policy, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at LHA's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. Please contact Autumn Gold, your MTW Coordinator, at [autumn.j.gold@hud.gov](mailto:autumn.j.gold@hud.gov) if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "John M. Concannon".

John Concannon  
Moving to Work Program Director  
Office of Public Housing Investments

cc: Julie Steadman, Omaha Field Office

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Susan Tatum, Tenant Services Manager

Jim Mahoney, Maintenance Manager

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 (HUD) and Lincoln Housing Authority. This agreement was signed by both parties in April, 2008 and extended the MTW program until the end of the housing authority’s 2018 Fiscal Year. On April 14, 2016, HUD sent a letter further extending the MTW program to the end of the housing authority’s 2028 Fiscal Year. The required elements of the annual plan and report are detailed in HUD Form 50900 (OMB Control Number: 2577-0216 Expiration Date: 08/31/2027)

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## I. Introduction

The Lincoln Housing Authority is an original member of a group of housing authorities across the country participating in the U.S. Department of Housing and Urban Development (HUD) Moving to Work demonstration program. Originally authorized under the Omnibus Consolidated Rescissions and Appropriations Act of 1996, the MTW program offers public housing authorities the opportunity to design and test innovative, locally-designed housing and self-sufficiency strategies. The statutory goals of the MTW demonstration are:

Reduce cost and achieve greater cost effectiveness in Federal expenditures

Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and

Increase housing choices for low-income families.

Lincoln Housing Authority and HUD entered into a five-year MTW Agreement in May, 1999. This agreement was amended several times to extend the demonstration program. In 2008, a new Amended and Restated MTW Agreement was signed. This agreement extended the MTW demonstration at Lincoln Housing Authority until 2018. In April 2016, the agreement was extended to 2028.

From the beginning of the demonstration, 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 continuously issue new vouchers to many of the neediest persons in Lincoln, Nebraska.

Lincoln Housing Authority (LHA) is planning to convert its public housing units from the public housing model to a project-based voucher model to stabilize the funding while continuing to offer high quality assisted housing. Due to the good condition of LHA's public housing units, we

are seeking a simple conversion of subsidy without additional financing and minimal rehabilitation. LHA intends to continue to own and operate the units as affordable rental housing, either directly or through a controlled affiliate. LHA has completed a conversion of Mahoney Manor, a 120-unit senior apartment complex through the Rental Assistance Demonstration (RAD) program and is considering an application under the Section 18 disposition requirements for scattered site public housing. LHA intends to project-base Tenant Protection Vouchers in most of the scattered site units. We anticipate applying under Section 18 late in the 2024-2025 or early 2025-2026 fiscal year. We had planned to apply in a previous fiscal year but changes due to COVID-19 and other priorities have limited our ability to move forward and to do outreach to affected families.

We are concerned that the RAD funding formula will result in contract rents that are significantly below market at conversion, and the RAD rules could result in rent increases for some tenants who currently pay higher ceiling rents. We are using MTW flexibility to enact a fair and reasonable rent policy for the RAD converted units and/or Section 18 disposition units. RAD conversion and/or Section 18 disposition will result in elimination of the Public Housing Capital Fund and Public Housing Operating Fund. LHA will operate the converted properties and establish capital improvement reserves from the rental income stream, which is how LHA operates all its other rental properties. We also plan to use MTW flexibility to utilize the remaining public housing operating reserves for the converted units. The current Capital Fund 5-year plan will be used as a basis for future capital improvement planning. Additional information is found in Section II and in Appendix F.

Lincoln Housing Authority continues to be 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. Since the inception of MTW, we have been able to leverage non-HUD sources to add additional rental units, mostly through the Low-Income Housing Tax Credit (LIHTC) 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. We plan to continue to develop additional affordable rental housing. We received a LIHTC award in 2022 for a new development, and began construction during the 2023-24 fiscal year. We have begun leasing and expect to complete construction of 64 additional affordable units by January 2025. However, this is outside the scope of the MTW program. The new development is located in a new growth area of the city and will provide another opportunity area location for Housing Choice Vouchers.

The city of Lincoln and the state of Nebraska has been fortunate to have maintained low



unemployment rates over the past several years. This has been an important factor in the Moving to Work Demonstration. The Nebraska Department of Labor reports the statewide unemployment rate in August 2024 was 2.7% this is the fifth lowest unemployment rate in the country. The national unemployment rate during August 2024 was 4.2%, this is an increase of 0.4% since August of 2023. Low unemployment continues to result in tight labor markets that have pushed up wages and benefits and is an important factor in the continued success of the housing authority's MTW initiatives.

Since beginning the Moving To Work program, Lincoln Housing Authority 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 traditional Section 8 Housing Choice Voucher program has been 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 limits 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.

## Goals and Objectives

The Lincoln Housing Authority has a number of goals and specific objectives that are integral to our success as a Moving To Work housing authority. Many of 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 work-able participants to work or seek self-sufficiency through job training or education. Also provide disincentives to work-able 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.

-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.

### MTW INITIATIVES

For LHAs fiscal year 2025-2026, the housing authority will continue to implement the following MTW initiatives. These are described in detail in Section IV. Approved Activities:

#### Rent Reform Initiatives

- Interim Re-examinations
- Minimum Earned Income
- Rent Calculations at 27% with no deductions
- Rent Choice Capped at 50% (voucher only)
- Average Utility Allowances (voucher only)
- Biennial re-examinations for elderly and disabled households

#### Other Initiatives

- Income Eligibility
- Responsible Portability (voucher only)
- Housing choice voucher inspection waiver for properties where the annual or initial inspections are without deficiencies.
- Inspections and rent reasonableness regardless of ownership or management status

- Project-based Section 8 Units
- RentWise Tenant Education
- Resident Services Program at Crossroads House
- Landlord Incentive HAP (voucher only)

## II. General Operating Information

### A. HOUSING STOCK INFORMATION

#### i. Planned New Public Housing Units

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZES						TOTAL UNITS	POPULATION TYPE	Section 504 Accessible Units (Mobility)	Section 504 Units (Hearing /Vision)
	0	1	2	3	4	5+				
NA							0	NA	0	0
NA							0	NA	0	0
Total Public Housing Units to be added in the plan Year:							0			

If "Population Type" Is "Other" please describe:

Not applicable

#### ii. Planned Public Housing Units to be Removed:

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
------------------------	-------------------------------------	-------------------------

AMP 2	149	Section 18 Disposition—see below
AMP 3	51	Section 18 Disposition—see below
	<b>200</b>	<b>Total Public Housing Units to be Removed in the Plan Year</b>

LHA completed the RAD conversion for AMP 1, Mahoney Manor, during the FY2019-20 plan year. LHA is preparing an application under the Section 18 Disposition requirements for AMP 2 and AMP 3, scattered site public housing units, to be completed by December 31, 2025. We intend to project-base Tenant Protection Vouchers in most of the scattered site units following disposition.

**iii. Planned New Project-Based Vouchers:**

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
	200	NA	Section 18 Disposition of AMP 2 and AMP 3, up to 200 units of scattered site family Public Housing
	200	Planned Total Vouchers to be Newly Project-Based	

Pending approval of the Section 18 Disposition application, the date of the anticipated Housing Assistance Payment will be March 1, 2026.

**iv. Planned-Existing Project-Based Vouchers:**

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Victory Park	70	Leased	No	LHA was awarded 45 project-based VASH vouchers and is project-basing an additional 25 tenant-based HUD VASH vouchers. The HAP contract was signed December 1, 2017 with lease-up beginning immediately.
Mahoney Manor	120	Leased	Yes	Conversion Date October 1, 2019
Crossroads House	58	Leased	No	Crossroads House is a 58 unit tax credit high rise apartment building in downtown Lincoln serving individuals age 55 and older.
	248	Planned Total Existing Project-Based Vouchers		

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

LHA was awarded 127 new Mainstream Vouchers over the last couple of years in three rounds of funding. We have actively leased up vouchers to a monthly average of 124 mainstream vouchers a month in FY24 and plan to continue with similar usage to avoid over-expending funds. MTW HCV activities apply to the Mainstream Vouchers.

In May 2021, HUD awarded LHA 100 Emergency Housing Vouchers (EHV) to be operated in partnership with Lincoln’s Continuum of Care (CoC). The CoC began EHV referrals in September 2021. HUD approved all MTW activities for the EHV program except Minimum Earned Income and Responsible Portability. LHA had no remaining EHV unissued vouchers to issue after the sunset of EHV on September 30, 2023.

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

PLANNED CAPITAL FUND EXPENDITURES - 2026 MTW PLAN		
AMP 2	Hall - Replace Vinyl Siding	\$ 226,000.00
AMP 2	Hall - Replace Electrical Panels	\$ 50,000.00
AMP 2	Hansen - Replace Electrical Panels	\$ 100,000.00
AMP 2	Hansen - Replace Retaining Wall (705 W Garfield)	\$ 28,942.00
AMP 2	Pedersen - Replace Front Stoops & Railings	\$ 50,000.00
AMP 2	Pedersen - Foundation Repairs	\$ 8,000.00
AMP 2	Larson - Replace Electric Panels	\$ 50,000.00
AMP 3	F39 - Replace Electrical Panels	\$ 60,000.00
AMP 3	A12 - Replace Electrical Panels	\$ 23,000.00
HA/Wide	Fees & Costs	\$ 2,499.00
HA/Wide	Move To Work	\$ 1.00
AMP 2	Hall - Radon Testing & Mitigation	\$ 46,000.00
AMP 2	Hansen - Radon Testing & Mitigation	\$ 96,000.00
AMP 2	Hansen - Replace Vinyl Siding	\$ 195,942.00
AMP 2	Pedersen - Radon Testing & Mitigation	\$ 48,000.00
AMP 2	Larson - Radon Testing & Mitigation	\$ 48,000.00
AMP 3	F39 - Radon Testing & Mitigation	\$ 78,000.00
AMP 3	A12 - Radon Testing & Mitigation	\$ 24,000.00
HA/Wide	Administration	\$ 45,058.00
HA/Wide	Fees & Costs	\$ 4,999.00
HA/Wide	Move To Work	\$ 1.00
Period of Time: April 1, 2025 thru March 31, 2026		\$ 1,184,442.00



## B. LEASING INFORMATION

### i. Planned Number of Households Served

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
Public Housing Units Leased	2,352*	196
Housing Choice Vouchers (HCV) Utilized	36,000***	3,000
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	0	0
Local, Non-Traditional: Homeownership^	0	0

\* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year. For public housing, the number of units leased is based upon 98% average monthly occupancy. For HCV, the average HCV voucher utilization is estimated to be approximately 3,000 per month based on current funding levels including Mainstream, VASH and Emergency Housing Vouchers.

\*\* “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.

\*\*\* “Housing Choice Vouchers (HCV) Utilized” includes all SPVs within the MTW PHA’s portfolio.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	NA	0	0
Property-Based	NA	0	0
Homeownership	NA	0	0

\* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
-----------------	------------------------------------------------------------------

**MTW Public Housing**

Lincoln Housing Authority converted Mahoney Manor (120 units) to project based vouchers (RAD conversion) effective October 1, 2019 and has 200 scattered site public housing units remaining. We anticipate all 200 units will be leased with an average occupancy rate of 98% and an average unit turnaround rate of approximately 20 days per vacancy. Any vacant units are part of normal tenant turnover; we anticipate no extended vacancy issues. We expect, based on prior year turnover, that 30 to 35 units will experience a vacancy in the coming year. Lincoln Housing Authority still intends to apply for Section 18 Demolition and/or Disposition of Public Housing Property for the remaining 200 scattered site units. We anticipate applying under Section 18 late in the 2025-2026 fiscal year.

The scattered site Public Housing units are family units consisting

entirely of single-family and duplex, scattered site homes. They are in good condition and blend-in well with the neighborhoods in which they are located but, the scattered nature of the units make them less efficient to operate.

When the conversion of the scattered site units is completed, new applicants/tenants will need to qualify under the very low income limits of the Section 8 program. This will reduce the number of people who are eligible for the units; however, we currently have a sufficient number of applicants on the waiting list and do not anticipate this to be a significant leasing issue.

### **MTW Housing Choice Voucher**

As funding allows, the HCV program goal is to utilize at least 3,000 HCV and VASH vouchers each month (90% of voucher allocation) under the MTW program, or higher if funding allows. Ongoing increases in rental costs and the tight rental market combined with changes in the economy impede on the success of utilizing 100% of the voucher allocation. The projected issues are as follows:

The Lincoln rental market for affordable housing remains very competitive with unit vacancy rates remaining extremely low. Unfortunately, LHA voucher holders are often not selected by landlords in this type of rental market due to common low-income tenant traits such as poor rental history or credit history. Additionally, in a low-vacancy rental market, some landlords choose not to participate in the voucher program. LHA established the Landlord Incentive HAP as an MTW initiative in FY 2015 and increased again in FY2021. In FY2024 the incentive increased to \$400 for units that pass on the first inspection and remained at \$200 for units that fail the first inspection. LHA will continue the current incentive practice through FY2026, which has helped increase the average number of new landlords from 27 a month to 33 so far in FY2025.

Rental application fees and security deposits continue to be a common leasing barrier for voucher holders. Many of the new voucher holders searching for rental units are paying 50-70% of household income for

shelter expenses making it very difficult to save for the associated costs of moving to use their voucher. LHA manages a homeless deposit assistance program funded by the City of Lincoln's HOME funds. Effective October 1, 2023 the amount available for individual requests increased to match the individual's contract rent rather than limited to the payment standard. LHA expended the entire contract funds prior to the end of the contract term but was able to secure additional funds. This program assisted with 50 households (9.8% of new admissions) during FY2024.

LHA continues to work in partnership with other human service agencies to promote tenant training through an established curriculum entitled "Nebraska RentWise", see Initiative 7 under Section IV.

**Local, Non-Traditional**

Not Applicable

## C. WAITING LIST INFORMATION

### i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan year.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST*	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
MTW Housing Choice Voucher	Agency-wide-- Families, Elderly and Disabled	3,097	OPEN	YES
Public Housing- Family	Agency-wide-- Family Housing	367	OPEN	YES
Mahoney Manor— Project-Based Vouchers	Site-Based--Elderly and Near Elderly	165	OPEN	YES
Crossroads House— Project-Based Vouchers	Site-based— Age 55+	80	OPEN	YES

\*Data pulled 8/5/2024 to project anticipated waiting list numbers for HCV and 10/9/2024 for the others listed above.

ii. **Planned Changes to Waiting List in the Plan Year**

<b>WAITING LIST NAME</b>	<b>DESCRIPTION OF PLANNED CHANGES TO WAITING LIST</b>
MTW Housing Choice Voucher	No Planned Changes—Waiting list will be open
Public Housing-Family	We plan to convert most of the Public Housing units to Project-Based Vouchers. We will continue to have a separate waiting list for these units and the waiting list will be open.
Mahoney Manor - Project-Based Vouchers	No Planned Changes—Waiting list will be open.
Crossroads House—Project-Based Vouchers	No Planned Changes—Waiting list will be open

### **III. Proposed MTW Activities**

No new initiatives are proposed for 2025-2026.

## IV. Approved MTW Activities: HUD approval previously granted

### A: IMPLEMENTED ACTIVITIES

<b>Rent Reform Initiatives</b>		
<b>Number</b>	<b>Description</b>	<b>Statutory Objective</b>
Rent Reform 1	Interim Re-examinations	-Cost Effectiveness - Self-Sufficiency
Rent Reform 2	Minimum Earned Income	-Self-Sufficiency
Rent Reform 3	Rent Calculations	-Cost Effectiveness
Rent Reform 4	Rent Burden (Rent Choice)	-Housing Choice
Rent Reform 5	Average Utility Allowances	-Cost Effectiveness
Rent Reform 6	Biennial Re-Examinations	-Cost Effectiveness
<b>Other Initiatives</b>		
Initiative 1	Income Eligibility	-Cost Effectiveness
Initiative 2	Responsible Portability	-Cost Effectiveness
Initiative 3	Initiative 3 moved to Rent Reform 6 at HUD's request.	
Initiative 4	HQS Inspections Waiver	-Cost Effectiveness
Initiative 5	Inspections & Rent Reasonableness Determinations	-Cost Effectiveness
Initiative 6	Project-Based Voucher Units	-Housing Choice -Cost Effectiveness
Initiative 7	RentWise Tenant Education	-Housing Choice -Cost Effectiveness
Initiative 8	Resident Services Program	-Housing Choice
Initiative 9	Landlord Incentive HAP	-Housing Choice

On the following pages, the following abbreviations are used: CE = Cost Effectiveness; HC = Housing Choice; and SS = Self-Sufficiency. In May, 2013, a revised HUD Form 50900 was approved for use by the Office of Management and Budget (OMB). HUD Form 50900 provides details on the required elements of the Annual MTW and Annual MTW Report. The form requires the use of standard metrics, as applicable; in order to allow HUD to analyze and aggregate data across all PHA's with similar activities. The form was further updated in July, 2021. On the following pages, we have identified the standard metric(s) applicable to each initiative.



## Rent Reform 1

### ACTIVITY: INTERIM RE-EXAMINATIONS

<b>Programs Affected:</b>	HCV & PH
<b>Plan Year Approved:</b>	FY 2000
<b>Plan Year Implemented:</b>	FY 2000
<b>Statutory Objectives:</b>	<ul style="list-style-type: none"><li>-Reduce cost and achieve greater cost effectiveness in federal expenditures</li><li>-Give incentives to obtain employment and become economically self-sufficient</li></ul>

#### DESCRIPTION OF ACTIVITY

This initiative reduces the requirement for interim re-examinations:

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. LHA is continuing this process, waiving the implementation of the discretionary HOTMA rule related to interim reexaminations for increases in adjusted income.

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 process the rent decrease 90 days after the decrease in income occurred or after all verifications are received to re-determine eligibility, whichever is the latest. Families who 1) lose income related to a secondary part-time job when a primary full-time job is still intact, or 2) 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 re-employment period if they meet one of the exemptions for the Minimum Earned Income (MEI) requirement shown later in this plan (Rent Reform #2). The 90 day re-employment rule will

apply for new admissions to both voucher and public housing programs. We will include any income earned within 90 days of the new admission interview date or thereafter. We will allow for verifications to occur no later than ninety (90) days prior to voucher issuance due to the difficulty in obtaining some verifications and to eliminate the inefficiency of requiring families to come back in and resign paperwork and provide updated verifications.

The sections on income increases and decreases requires MTW flexibility for HOTMA reexamination changes to 24 CFR 982.516 as LHA is utilizing a reexamination program different from the new HOTMA rules. The 90-day rule 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(c)(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, HUD has in the past defined “reasonable time” as the first day of the month following the date of the reported change.

We chose to list the above policies together. Since the beginning of our 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. As family income increased, they are not subject to an immediate re-examination of income and assets and the corresponding rent increase.

#### **UPDATE ON STATUS OF ACTIVITY**

This initiative has been part of LHA’s MTW program since the beginning. LHA continues to implement the policy of decreasing rent 90 days after a decrease in employment income has occurred. This policy encourages families to retain employment as well as to make it a priority to seek new employment when job losses occur. Our most recent data shows that of the households who reported job losses, 80% did not require a rent change, indicating they obtained new employment. The 80% of households with no rent decrease after a job change or loss is indicative of the success of the MTW employment requirements incentivizing families who become unemployed to seek and obtain new employment. The Lincoln Metropolitan Statistical Area has historically maintained a low unemployment rate, the current rate is 2.5 % (July 2024) which is important to the success of this initiative

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

The rule to wait to implement a possible rent increase due to a family's income increase applies to all SPVs. The 90-day delay for a rent decrease related to a family members reduction or termination n employment applies to all SPVs with the exception of VASH.

**PLANNED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

We have added language to clarify that we are continuing the initiative as designed and not implementing corresponding rule changes under HOTMA.

**CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will continue to report on metric SS#3, Increase in Positive Outcomes in Employment Status (#6 Other Category, Number of Households who are Employed Full-Time or Part-Time) , and SS#8 Households Transitioned to Self-Sufficiency, as well as our local metric.

## **Rent Reform 2**

### **ACTIVITY: MINIMUM EARNED INCOME**

<b>Program Affected:</b>	HCV & PH Programs
<b>Plan Year Proposed:</b>	FY 2000
<b>Plan Year Approved:</b>	FY 2000
<b>Plan Year Implemented:</b>	FY 2000
<b>Statutory Objectives:</b>	Give incentives to obtain employment and become economically self-sufficient

#### **DESCRIPTION OF ACTIVITY**

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 or state minimum wage, whichever is greater. The minimum amount of earned income for families with two or more eligible adult members will be based on an additional 15 hours per week of employment at minimum wage for each additional eligible adult not exempted from the Minimum Earned Income (MEI) policy. LHA will count the higher of the 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. These exemptions serve as the hardship policy for the MEI requirement.

#### **UPDATE ON STATUS OF ACTIVITY**

The MEI has been a part of the housing authority's MTW program from the beginning. MEI

promotes and encourages employment by implementing a work requirement with a basic expectation that a work-able adult should work at least 25 hours per week at minimum wage. The family has the flexibility to figure out how to meet the rent generated by the MEI rather than a strict requirement to work a certain number of hours. In that sense it is 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. Over the years, the MEI has gradually increased in step with increases in the federal or state minimum wage as shown in the chart below.

<b>Effective Date</b>	<b>Minimum Wage</b>	<b>MEI for 1 person (25 hours per week)</b>	<b>MEI for 2 persons (additional 15 hours per week)</b>
<b>July 1, 1999 (start of MTW)</b>	<b>\$5.15</b>	<b>\$6,698</b>	<b>\$10,712</b>
<b>July 24, 2007</b>	<b>\$5.85</b>	<b>\$7,605</b>	<b>\$12,168</b>
<b>July 24, 2008</b>	<b>\$6.55</b>	<b>\$8,515</b>	<b>\$13,624</b>
<b>July 24, 2009</b>	<b>\$7.25</b>	<b>\$9,425</b>	<b>\$15,080</b>
<b>January 1, 2015</b>	<b>\$8.00</b>	<b>\$10,400</b>	<b>\$16,640</b>
<b>January 1, 2016</b>	<b>\$9.00</b>	<b>\$11,700</b>	<b>\$18,720</b>
<b>January 1, 2023</b>	<b>\$10.50</b>	<b>\$13,650</b>	<b>\$21,840</b>
<b>January 1, 2024</b>	<b>\$12.00</b>	<b>\$15,600</b>	<b>\$24,960</b>
<b>January 1, 2025</b>	<b>\$13.50</b>	<b>\$17,550</b>	<b>\$28,080</b>

As of the end of FY2024, about 10.2% of voucher households and 14.14% of public housing

households were affected by Minimum Earned Income requirement. The majority (63%) of households are able to discontinue the MEI requirement through employment or participation in education or an approved self-sufficiency program. Our FY24 MTW Annual Report data also showed 88% of public housing and 81% of voucher households who are work-able have income from employment.

**APPLICATION OF ACTIVITY TO SPV TYPES**

The Minimum Earned Income Requirement applies to Mainstream voucher households but does not apply to VASH or EHV voucher households.

**PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

A voter initiative to incrementally increase the state’s minimum wage from \$9 to \$15 per hour by 2026, was approved in November 2022. Starting January 1, 2023, the MEI has been adjusted each year accordingly.

**CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will continue to report on metric SS#3, Increase in Positive Outcomes in Employment Status, and SS#8 Households Transitioned to Self-Sufficiency, as well as our local metrics.

## Rent Reform 3

### ACTIVITY: RENT CALCULATIONS

**Programs Affected:** HCV & PH Programs

**Plan Year Proposed:** FY 2009

**Plan Year Implemented:** FY 2009

**For Item E:**

**Plan Year Proposed:** FY 2000

**Plan Year Approved:** FY 2000

**Plan Year Implemented:** FY 2000

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

### DESCRIPTION OF ACTIVITY

A. Total Tenant Payment: Total Tenant Payment (TTP) is determined on 27% of gross income with no allowable deductions.

B. Minimum Rent: 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. The minimum TTP is also \$25.00. The minimum rent requirement is waived if the head of household is disabled and has a current Social Security application pending. The minimum TTP is not waived.

C. Calculation of Asset Income: For households with total assets for which the face value is equal to or greater than \$50,000, asset income will be based on a 2% rate multiplied by the face value above \$50,000. 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 \$50,000 in face value, first acceptable verification level is self-certification of face value and income. The asset income will be excluded if total assets are less than or equal to

\$50,000.

Special Needs Trusts and ENABLE are excluded as assets. ENABLE accounts allow children and adults with qualifying disabilities in Nebraska to save money without jeopardizing their eligibility for government benefits.

Rental properties are considered personal assets and held as investments rather than business assets. Therefore, under MTW policy asset income from rental properties held by applicants/tenants will be calculated using either 1) the actual annual generated income from the asset, or 2) the imputed asset income by using the face value of the property multiplied by 2%, whichever is greater.

D. 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: Pay statements (paystubs) covering no less than thirty (30) days will be collected.

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

E: Other: LHA will not implement regulatory provisions related to Earned Income Disregard, public housing flat rents, imputed welfare income and full-time student earned income exclusions. LHA will not include any earned income for a full-time student under 22 years of age. LHA will not implement HOTMA changes related to including other financial assistance in excess of tuition and other required fees and charges for those over the age of 23 with dependent children or if the student is living with his or her parents who are receiving Section 8 assistance. LHA will continue to utilize the same methodology for Section 8 assistance as utilized for Public Housing. Also, LHA will not implement HOTMA regulatory provisions to include Special Needs Trusts as an asset or income even if the Special Needs Trust is making regular payments on the behalf of the beneficiary from interest on the trust. LHA will exclude income received for participation in grant-funded research on the impact that income has on the development of children in low-income families, if the income has also been excluded by the State of Nebraska for use in determining eligibility for Aid to Dependent Children. The exclusion shall not exceed \$4,000 per year for four years. The research income known as the 4MyBaby gift qualifies under this exemption. LHA will also not implement the HOTMA changes related adoption assistance as LHA will exclude all adoption assistance rather than just the amount in excess of \$480.



The HOTMA restriction on the eligibility of a family to receive assistance if the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$100,000 will not be enforced for existing or new admission MTW program participants.

LHA is using its discretion to not implement the HOTMA for safe harbor income verifications or deductions that are already excluded under MTW flexibilities nor hardship, general relief or phased in relief policy options related to deductions. LHA's MTW rent structure does not include deductions.

For the FSS program, escrow will be calculated using 27% growth in monthly rent, this is the amount by which the current monthly rent exceeds the baseline monthly rent.

In implementing the above, a hardship policy was created for tenants who were adversely affected. Details for the hardship policies are found in the Admissions and Continued Occupancy Plan and Section 8 Administrative Plan found in Tab 1 and Tab 2 of this MTW Plan.

The hardship policy applies to existing tenants or voucher participants as of specified implementation dates. At the next annual re-certification on or after the implementation date, if it is determined that calculating TTP based on 27% of monthly gross income with no deductions will increase the tenants TTP by more than \$25, then LHA will limit the increase by utilizing the Hardship TTP.

To calculate the Hardship TTP, LHA calculates the Monthly Adjusted Income using the household's current Annual Income minus the amount of pre-existing deductions that were utilized at the last re-examination prior to the implementation date. The Hardship TTP is calculated based on 30% of this Monthly Adjusted Income, plus an additional \$25 for each successive annual re-examination. If a tenant qualifies for the initial Hardship TTP, then LHA will calculate successive Hardship TTPs by adding an additional \$25 at each annual re-examination until the Hardship TTP equals or exceeds the TTP calculated based on 27% of monthly gross income. Each year a tenant must self-certify that the previous deductions are reasonably the same or have increased. If the amount of deductions has decreased for a tenant (for example a family no longer pays day care), then a tenant will no longer qualify for the Hardship TTP. In no case shall the Hardship TTP be less than \$50 or the Tenant Rent be less than the \$25 minimum rent.

Travel expense for individuals leaving the state for more than 60 days in a 24 month period while assisted will be included as income.

## **UPDATE ON STATUS OF ACTIVITY**

These revised methods of calculating housing assistance for households are much simpler and less prone to errors. Tenants, participants, landlords, and advocates have appreciated the greater simplicity and ease of understanding compared to traditional methods for calculating housing assistance.

The hardship policy has been used to alleviate any steep increases in rent. The number of hardships decreased steadily over time, and as of March of 2021, there were no hardship cases remaining.

Staff continue to save a significant amount of processing time while also improving rent calculation accuracy because of these initiatives. Using comparisons of processing time for MTW participants versus non-MTW participants, the LHA annual report for 2023-2024 shows approximately 33% administrative time savings for new move-ins and 48% administrative time savings for annual re-examinations compared to non-MTW programs. That additional time has allowed LHA to add more vouchers (Mainstream, VASH, Emergency Housing Vouchers and Tenant Protection Vouchers) and do more auditing. Time savings varies by experience level of staff. More seasoned staff are assigned to the non-MTW programs. Because of their experience, they are more efficient compared to newer staff assigned a MTW caseload who take more time for annual re-exams.

## **APPLICATION OF ACTIVITY TO SPV TYPES**

The rent calculation rule using 27% of income applies to all SPVs. The minimum rent rule applies to all SPVs with the exception of VASH participants

## **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

## **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will continue to report on metric SS#3, Increase in Positive Outcomes in Employment Status (#6 Other Category, Number of Households who are Employed Full-Time or Part-Time) , and SS#8 Households Transitioned to Self-Sufficiency, as well as our local metric.

## **Rent Reform 4**

### **ACTIVITY: RENT CHOICE**

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2008
<b>Plan Year Approved:</b>	FY 2008
<b>Plan Year Implemented:</b>	FY 2008
<b>Plan Year Amended:</b>	FY 2009
<b>Statutory Objective:</b>	Increase housing choice for low income families

### **DESCRIPTION OF ACTIVITY**

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

### **UPDATE ON STATUS OF ACTIVITY**

When starting MTW in 1999, the housing authority elected to have no cap on rent burden in order to give maximum choice to voucher participants. However, an increasing number of households began putting their housing in jeopardy because their housing choice required 60% or more of household income be spent on shelter expenses. Given this trend, the housing authority in consultation with the Resident Advisory Board felt a rent burden cap was needed but elected to go higher than normal HUD rules. In FY19-20, MTW rules were applied to the Mainstream program as well. This eliminates the non-MTW comparison group for this initiative.

As shown in LHA's most recent MTW annual report, this initiative expands housing opportunities and spatial dispersal of voucher holders. In FY24 sixty-seven voucher families utilized Rent Choice to move into twenty-six different census tracts. Among new admission or transfer households who exceed the 40% cap, 37% are residing in middle to upper income census tracts.

We believe this initiative will continue to be needed in order to maintain voucher utilization. Expanding this variable for families looking for housing gives participating households more housing options within the city of Lincoln. With the option of exceeding the federal rent burden cap of 40%, families can extend their housing search outside of primarily low-income neighborhoods. This larger search area allows families to select housing that fits into a bigger picture of needs that also factors in work, school and family supports.

**APPLICATION OF ACTIVITY TO SPV TYPES**

Rent Choice rule to increase the maximum initial rent to 50% applies to all SPVs.

**PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

**CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## Rent Reform 5

### ACTIVITY: AVERAGE UTILITY ALLOWANCES

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2000
<b>Plan Year Approved:</b>	FY 2000
<b>Plan Year Implemented:</b>	FY 2000
<b>Statutory Objective:</b>	Reduce cost and achieve greater cost effectiveness in federal expenditures

#### DESCRIPTION OF ACTIVITY

LHA uses one standard utility allowance per bedroom size regardless of tenant utility responsibility and will not issue utility reimbursement checks or payments. The utility allowances were established using the average utility cost per number of bedrooms per unit. The utility allowances are reviewed annually and adjusted based on rate changes.

This activity applies to both tenant-based and project-based vouchers.

The following chart shows the current Fair Market Rents (October 1, 2024) and the continued payment standards, utility allowances and target rents established in 2023. Changes to the payment standard were not needed for the 2024 FMRs as LHA continued to be over 100% of the FMRs, within the acceptable range required by HUD. The utility allowance also did not change as they continued to be within the acceptable range required by HUD.

Bedroom Size	FY25 FMR	Payment Standard	% of FMR	Target Rent	Utility Allowance
SRO	\$611	\$632	103.44%	\$632	\$ -
0	\$815	\$842	103.31%	\$799	\$43
1	\$910	\$941	103.41%	\$849	\$92
2	\$1,125	\$1,173	104.27%	\$1,037	\$136
3	\$1,576	\$1,653	104.89%	\$1,449	\$204
4	\$1,685	\$1,801	106.88%	\$1,525	\$276
5	\$1,938	\$2,072	106.91%	\$1,740	\$332
6	\$2,191	\$2,324	106.07%	\$1,949	\$375

Tenant Protection Vouchers (TPVs) are meant to ensure there is no displacement of low-income residents as a result of various actions resulting in a loss of HUD subsidy assistance that is attached to a specific unit. HUD identifies and allocates Tenant Protection Vouchers as the special circumstances arise.

Enhanced Vouchers (EVs) are a form of TPV that, in certain circumstances, allows the gross rent to exceed the local voucher payment standard to allow existing families to remain in their units even if the owner increases the rents. Enhanced vouchers are generally issued to provide continued assistance for a family at the termination of project-based rental assistance program. If the family stays in the same project, the voucher payment standard covers the full market rent. Enhanced vouchers have several special requirements, but in all other respects are subject to rules of the tenant-based voucher program. Some of the differences include a special statutory minimum rent requirement and a special payment standard, applicable to a family receiving enhanced voucher assistance who elects to stay in the same unit. If the family moves, all normal voucher rules apply.

MTW Utility Allowance Hardship: If a household is eligible to receive an enhanced voucher and their unit's utility allowance exceeds the Moving to Work utility allowance at the time of program conversion, then the enhanced voucher household will be granted a Moving to Work Utility Allowance hardship.

The MTW Utility Allowance hardship will allow the enhanced voucher household to retain the utility allowance amount established on the date of the program conversion (i.e. locked-in enhanced utility allowance), as long as the following two conditions exist.

- 1) The tenant remains in the original unit; and
- 2) The MTW Utility Allowance is less than the "locked in" enhanced utility allowance.

Public Housing conversion to Project-Based Vouchers:

Mahoney Manor (AMP 1) was converted (RAD conversion) to project-based vouchers effective October 1, 2019. All utilities are included in the rent so there will not be a utility allowance for this property.

Family Scattered Site units (AMPs 2 & 3) are planned to be converted to project based vouchers during this plan year utilizing provisions of Section 18 Demolition/Disposition of

Public Housing. In order to minimize disruption to existing tenants, the Average Utility Allowance will not be used for the 200 units under the Section 18 conversion. The converted PBV development, Family Scattered Sites, will have its own utility allowances.

### **UPDATE ON STATUS OF ACTIVITY**

The average utility allowance has been part of the MTW program since 1999. Voucher participants appreciate the simplicity of a single utility allowance as it helps them to know the amount of rent assistance they can expect, making it far easier to search for a unit. They know what target rent they should attempt to achieve, and they understand the value of finding units that are energy efficient or with landlord paid utilities.

Both tenants & landlords support the average utility allowance method. They understand how rental assistance is calculated. In a baseline measure, it took nearly five times longer to explain standard utility allowances in a new admission appointment compared to an explanation of average utility allowances. In addition, administrative costs have been saved by not issuing utility reimbursement checks or payments and MTW utility allowance calculations have a very low error rate compared to non-MTW programs. In past HUD studies using data from RIM audits, utility allowance calculations have been in the top 5 of errors. LHA error rates on the simplified MTW utility allowances are extremely low. LHA continues to do an annual evaluation of utility allowances. No other changes are planned for this initiative.

### **APPLICATION OF ACTIVITY TO SPV TYPES**

The one standard utility allowance rule applies to all SPVs.

### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

### **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on the standard metrics.

## Rent Reform 6

### ACTIVITY: BIENNIAL RE-EXAMINATIONS

**Programs Affected:** HCV and PH  
**Plan Year Proposed:** FY 2009  
**Plan Year Approved:** FY 2009 and FY 2010  
**Plan Year Implemented:** FY 2009 and FY 2010

#### Public Housing:

Effective March 15, 2009 for new move-ins

Effective July 1, 2009 for current tenants

Effective July 1, 2025 (or 3 months after the MTW plan approval if approved after April 1, 2025) expanded from elderly or disabled families to all households

#### Housing Choice Voucher

Effective April 1, 2009 for new admissions

Effective July 1, 2009 for some current program participants

Effective July 1, 2025 (or 3 months after the MTW plan approval if approved after April 1, 2025) expanded from elderly or disabled families to all households

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

### DESCRIPTION OF ACTIVITY



LHA is expanding, effective July 1, 2025 (or 3 months after the MTW Plan approval if approved after April 1, 2025), to conduct re-examination of all households, not just elderly or disabled, at least every two years. For current head of households on an annual review cycle, those with a tenant ID ending in 0, 1, 2, 3 and 4 will continue to have their next re-exam according to the month the re-examination is due between 2025 and 2026. Those with a tenant ID ending in 5, 6, 7, 8 and 9 will have their next re-exam according to the month the re-examination is due but between 2026 and 2027.

If payment standards are increased the increase will go in effect at the first of either 1) upcoming biennial reviews with effective dates between 3 full months from the payment standard approval date and within 15 months of the payment standard effective date, 2) an interim re-exam to incorporate the new payment standard completed in the skip year for any biennial review not due within the 15 months timeframe established in the preceding criteria, or 3) an interim for a gross rent change. This interim re-exam will only implement the new payment standard (including target rent and utility allowance) but will not include adjustments to family income. The re-exams will be conducted on the household's annual anniversary date during the skip year. All households will continue to have interim re-examinations, with the exception of according to administrative policy.

#### **UPDATE ON STATUS OF ACTIVITY**

This activity was successfully implemented and has been ongoing for elderly or disabled households. Our most recent data shows the two-year average number of annual reviews for elderly and disabled households increased from 599 reviews the previous reporting period to 764 this past fiscal year, which continues to be lower than the baseline number 1,249 reviews. However, the total number of elderly and disabled households in the program has increased substantially since the baseline and totaled 1,978 households at the end of the FY2024 fiscal year.

Tenants and voucher participants affected by this policy appreciate the reduced burden associated with the review process. In addition, they could have increased income between biennial re-examinations without a corresponding increase in their rent payment. Households continue to be eligible for rent decreases by means of interim re-examinations if they experience decreased income.

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

The rule to conduct reviews at least every 2 years applies to all SPVs.

### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

LHA is expanding the initiative to apply to all households, not just elderly and disabled, effective July 1, 2025.

### **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## **Initiative 1**

### **ACTIVITY: INCOME ELIGIBILITY**

<b>Programs Affected:</b>	HCV & PH Programs
<b>Plan Year Proposed:</b>	FY 2000
<b>Plan Year Approved:</b>	FY 2000
<b>Plan Year Implemented:</b>	FY 2000
<b>Statutory Objective:</b>	Reduce cost and achieve greater cost effectiveness in federal expenditures

### **DESCRIPTION OF ACTIVITY**

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:	50% of median income
Housing Choice Voucher:	50% of median income
VASH:	80% of median income

Income targeting will not be used.

### **UPDATE ON STATUS OF ACTIVITY**

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. 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. As part of our annual MTW report, we review admissions income levels relative to targeting standards each fiscal year,

and we continue to meet federal targeting standards. In addition, we continue to meet the statutory objective to ensure that at least 75% of the families assisted are very low-income families, as defined in section 3(b)(2) of the 1937 Act. This activity does not interfere with achieving that objective. 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.

LHA plans to convert the remaining Public Housing portfolio to a project-based voucher (PBV) program. Due to planned conversion under Section 18, LHA is now applying the HCV income limit (50% of area median) for the public housing and converted PBV properties, and public housing income limits no longer apply.

In the Public Housing and Voucher Programs, 100% of Public Housing and voucher new admissions in the last fiscal year were very low income or extremely low income.

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

The waiver of income targeting rule applies to all SPVs.

#### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

#### **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## **Initiative 2**

### **ACTIVITY: RESPONSIBLE PORTABILITY**

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2000
<b>Plan Year Approved:</b>	FY 2000
<b>Plan year Implemented:</b>	FY 2000
<b>Statutory Objective:</b>	Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **DESCRIPTION OF ACTIVITY**

Voucher participants will be allowed to port out upon request, after leased up for a year, if the receiving PHA will absorb the LHA Voucher. If the receiving agency does not absorb then participants will only be allowed to port upon request as a reasonable accommodation or for an employment, education, safety or medical need if the receiving PHA's Payment Standards do not exceed the LHA Payment Standards. This restriction is not applicable in cases of Emergency Transfer outlined in Section XXVIII of the Administrative Plan.

An employment exception will not be granted if the employment is for less income than is being earned on the last action or it does not result in income above the MEI. An educational exception will not be granted unless it is full-time education for a program not available remotely.

#### **UPDATE ON STATUS OF ACTIVITY**

The housing authority's policy continues to provide appropriate opportunities to port while preserving the integrity of our MTW program. Housing staff continues to educate and inform participants and potential participants about the responsible portability policy. Data shows that most requests for portability are approved.

The purpose of responsible portability in our MTW program is to reduce costs and 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 is allowed for specific reasons as listed above. Families are given information about our responsible portability policy and it is recognized that once people are aware of the policy, few formal requests are made. Our policy represents a highly successful implementation of a more responsible portability policy that could be adapted on nationwide basis. Portability represents a difficult and time-consuming administrative issue in voucher programs across the country. Allowing HA's to adopt policies that limit ports only for verifiable, good cause reasons would improve efficiency in voucher program administration nationwide.

In 2014, LHA did a time study on the amount of administrative time it takes per portable voucher and set a benchmark of 4.43 hours per voucher. Our baseline data reflects the results of this time study in the benchmark.

LHA has seen an increase in recent years of waiting list shopping – applicants from other parts of the country applying for a voucher in Lincoln to take back to their home state. Most of the increase in portability is a result of this practice. Often applicants are working in their home state, leave their job so they can come to Lincoln for a voucher and then port back home under the employment exception to return to the same job or a similar job that they had prior to moving to Lincoln. In the past fiscal year, we had 5 of 5 port out requests for employment approved. Our baseline level in 2008 was 5 ports out of 5 requests for employment reasons.

In April 2019, LHA modified its Administrative Plan to not permit voucher participants to port-out to housing authorities whose Payment Standards exceed the LHA Fair Market Rents unless the receiving PHA will absorb the LHA voucher. This restriction is not applicable in cases of Emergency Transfer outlined in Section XXVIII of the Administrative Plan.

### **APPLICATION OF ACTIVITY TO SPV TYPES**

The Responsible Portability rule applies to all SPVs with the exception of VASH and EHV.

### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

## **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

### **Initiative 3**

**Moved to Rent Reform 6 at HUD's request.**



## **Initiative 4**

### **ACTIVITY: HQS INSPECTIONS WAIVER**

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2010
<b>Plan Year Approved:</b>	FY 2010
<b>Plan Year Implemented:</b>	FY 2010
<b>Statutory Objective:</b>	Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **DESCRIPTION OF ACTIVITY**

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 re-examination 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 (RFTA) form was modified to satisfactorily implement this inspection incentive initiative. LHA developed a local form, the Request for Inspections and Unit Information form which 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, LHA also changed this local form after the Landlord Advisory Committee requested a statement be added to the form to indicate when assistance will start. The local form can be found in Appendix B.

LHA had previously opted for an extended compliance to implement NSPIRE until October 1, 2024, submitting the decision to HUD via email as required. HUD has since extended the compliance requirement to October 1, 2025.

In order to best retain participating landlords and serve tenants LHA is opting to not implement the Final Rule change to 24 CFR 982.404(d) regarding increasing the inspection abatement period to 60 days after noncompliance and to issue a voucher to a tenant 30 days prior to the termination of the HAP contract. The majority of abatements for LHA do not result in terminations and many tenants do not want to move from their current resident if the landlord will get into compliance with HQS. Issuing a voucher and the tenant notifying the landlord that they'll move presents a complication for the tenant and potential future landlord. If the current landlord resolves the deficiency(s) prior to termination and the tenant has already pursued a new unit the tenant and LHA then need to provide notice to the current landlord if no longer out of compliance. Currently, if a tenant wants to move during an abatement or once the HAP contract is terminated after an abatement the tenant requests and receives a 90-day voucher (or 120-days for VASH or Mainstream).

### **UPDATE ON STATUS OF ACTIVITY**

This initiative is ongoing since April 1, 2009. Tracking the next inspection date and collecting data on skipped inspections are very time consuming. LHA monitors the impact of this policy through a variety of measurements including: 1) number of annual voucher program inspections completed; 2) percentage of annual HQS inspections passing at the first inspection; and 3) the number of complaint inspections. 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. However, to ensure the quality of units, it is necessary to retain an annual inspection cycle for some properties.

The inspection waiver policy no longer needs a Moving to Work waiver as the HCV voucher program rules have changed as noted in final rule number 5743-F-03 published March 8, 2016 in the Federal Register. However, the use of the modified Request for Tenancy Approval form and the ability to coincide annual inspections with recertification dates does require a waiver.

The inspection waiver policy continues to have positive impact on the voucher program by providing administrative cost savings to LHA and improving Lincoln's housing stock.

### **APPLICATION OF ACTIVITY TO SPV TYPES**

The HQS inspection waiver applies to all SPVs.

## **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

LHA will not be implementing a change to issuing a voucher 30 days prior to the termination of a HAP contract for an abatement, as explained in the Description of Activities.

## **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## **Initiative 5**

### **ACTIVITY: INSPECTIONS & RENT REASONABLENESS**

<b>Program Affected:</b>	HCV Program
<b>Program Year Proposed:</b>	FY 2012
<b>Program Year Approved:</b>	FY 2012
<b>Program Year Implemented:</b>	FY 2012
<b>Statutory Objective:</b>	Reduce cost and achieve greater cost effectiveness in federal expenditures

#### **DESCRIPTION OF ACTIVITY**

LHA will perform all Inspections and Rent Reasonableness determinations on all tenant and project-based voucher units regardless of ownership of property management status including those that are owned or managed by LHA.

#### **UPDATE ON STATUS OF ACTIVITY**

LHA performs inspections and rent reasonableness determinations on the property owned or managed by LHA. This initiative has eliminated the administrative work and cost of acquiring and maintaining a contract to perform inspections and rent reasonableness determinations. Cutting out the middle man, the contractor; improves administrative efficiencies, eliminates confusion for the voucher participant, and improves the response time for performing inspections. LHA properties are generally in better condition than the average rental units participating in the voucher program. Our most recent report showed 80% of LHA properties passed at first inspection compared to 67% for all voucher properties. For FY2024, cost savings by not hiring an outside contractor was estimated at \$2,340.

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

The Inspections and Rent Reasonableness rules applies to all SPVs.

**PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

**CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## Initiative 6

### ACTIVITY: PROJECT-BASED SECTION 8 UNITS

**Program Affected:** HCV Program

Project-based units LHA owned or managed properties:

**Plan Year Proposed:** FY 2010

**Plan Year Approved:** FY 2010

**Plan Year Implemented:** Pending receipt of a viable application

Project-based units through other competitive process:

**Plan Year Proposed:** FY 2013

**Plan Year Approved:** FY 2013

**Plan Year Implemented:** FY 2013 to FY 2016

**Statutory Objective:**

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

### DESCRIPTION OF ACTIVITY

The Moving to Work waivers being used are: 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, 3) allow the 25% unit allocation per project cap be removed, 4) allow unit amendments to the project-based HAP contract beyond the three year limit in order to add units not initially included, 5) eliminate the requirement to furnish a copy of each inspection report to the HUD field office, 6) allow zero HAP participants to occupy a unit indefinitely and the unit will remain designated as a project-based unit under contract, 7) implement the utility allowances in accordance with Rent Reform #5, 8) allow LHA to perform the functions of rent

reasonableness determinations, HQS inspections, and enter into agreements to the terms of the HAP contract without the need for an independent entity for LHA-owned units, 9) Adjust some rent requirements for public housing conversions to project-based vouchers, and 10) Award project based vouchers to a City of Lincoln sponsored project serving homeless persons without competitive bid.

For tenants with zero HAP, if the tenant's income decreases, we will reinstate HAP payments. A zero HAP tenant will be eligible to move with a voucher in accordance with Housing Choice Voucher regulations. LHA complies with Housing Quality Standards, subsidy layering requirements, and other federal requirements regarding project-based assistance as set forth in Title 24 of the Code of Federal Regulations.

Project-based units through other competitive process:

In late 2017 LHA entered into a HAP contract for 70 project-based VASH vouchers at Victory Park Apartments. The project is the result of a collaboration between HUD, the Veterans Administration, LHA and the Lincoln Senior Foundation, a local non-profit organization that is redeveloping the Lincoln VA campus. HUD awarded LHA 45 project-based VASH vouchers for the development, and LHA converted an additional 25 tenant-based VASH vouchers into project-based vouchers for use in Victory Park Apartments. This development is part of the broader redevelopment of the VA campus. The "other competitive process" was the VA's selection process for an enhanced use lease agreement. LHA executed the Housing Assistance Payment Contract (HAP) for this project on December 1, 2017. All 70 units were ready for occupancy on December 1, 2017 and leasing started the same day.

As of July 17, 2015, the HUD Voucher Office has already authorized LHA to use 15 different MTW alternative requirements when administering HUD-VASH vouchers. On July 6, 2017, HUD approved an additional flexibility request to allow Victory Park Apartments to maintain a site-based waiting list and to implement the utility allowances in accordance with Rent Reform #5.

Project-based units LHA owned or managed properties:

LHA will 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 increase, maintain and preserve affordable housing. Each site may create a separate wait list for applicants interested in renting project-based units. LHA will eliminate the restriction on the percentage of units leased in a building or project.

LHA signed a contract effective July 1, 2012 to phase-in the project-based assistance at Crossroads House during a three-year period. The phase-in period allowed the opportunity to maintain 100% leasing without undue hardship on the voucher program budget and leasing requirements as well as preventing the displacement of any households over the 50% median income limit. The phase-in period has been completed.

Crossroads House Apartments is an elderly apartment complex with 58 one-bedroom units located in downtown Lincoln at 1000 O Street. These units were 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 residents must meet that age requirement to be eligible. The income eligibility limit for Crossroads House was set at the voucher program limit of 50% of median income rather than the tax credit limit of 60% median income. All 58 units are now project-based.

#### Public Housing conversion to PBV properties

LHA will operate Public Housing converted PBV developments in accordance with the HUD requirements, the MTW Agreement, and this LHA’s MTW Plan, including the provision that LHA will conduct inspections and determine rent reasonableness for these vouchers.

LHA will calculate rent in the following way for tenants who’s Total Tenant Payment (TTP) equals or exceeds the Gross Rent for the unit (Zero HAP tenants) in RAD developments.

#### Mahoney Manor

Both existing tenants (pre-RAD conversion) and new tenants (post-RAD) conversion will pay rent based on their TTP up to the Gross Rent for the unit. Zero HAP tenants will continue to pay the Gross Rent for the unit indefinitely until their income decreases or the Gross Rent increases to a point where they qualify for HAP again. A tenant’s portion of rent will not increase above the RAD PBV Gross Rent for the unit.

Rent Phase-in/Hardship Policy: We have developed the following phase-in of potential rent increases for households whose TTP exceeded the 2018 public housing ceiling rents at the time of conversion. At the first scheduled annual or biennial recertification following conversion, existing tenants at time of conversion will pay no more than the 2018 ceiling rent plus \$25.00. At the second scheduled annual or biennial recertification following conversion, existing tenants at time of conversion will pay no more than the 2018 ceiling rent plus \$50.00. At the third scheduled annual or biennial recertification following conversion, existing tenants at time of conversion will



pay up to the gross rent at the time of the recertification. This applies to all conversions from public housing to PBV.

Recertification Cycles: Upon conversion from public housing to project-based vouchers, the family's last public housing annual or interim income recertification will serve as the initial certification for the voucher program. The family will remain on the same annual or biennial review cycle and schedule. This applies to all conversions from public housing to PBV.

Utility Allowances. LHA will continue to calculate unit-based utility allowances for converted Public Housing units rather than use the single Voucher utility allowance under Rent Reform Initiative #5. This will minimize disruption in the rent calculation for in-place public housing residents converting to vouchers.

#### **UPDATE ON STATUS OF ACTIVITY**

LHA no longer plans to project-base 24 vouchers at a development targeting a chronically homeless population but instead is adding an additional preference for HCV applicants. The preference will be for chronically homeless applicants as identified by the local Continuum of Care's Coordinated Entry System.

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

Not applicable.

#### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

LHA continues to plan to convert the remaining Family Scattered Site Public Housing units to project-based vouchers under the Section 18 Disposition of Public Housing requirements. Conversion details for this initiative are found in the description above. We anticipate the Section 18 Disposition application will be completed by December 31, 2025.

#### **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## Initiative 7

### ACTIVITY: RENTWISE TENANT EDUCATION

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2012
<b>Plan Year Approved:</b>	FY 2012
<b>Plan Year Implemented:</b>	FY 2012
<b>Statutory Objective:</b>	Increase housing choice for low income families  Reduce cost and achieve greater cost effectiveness in federal expenditures

#### DESCRIPTION OF ACTIVITY

Lincoln Housing Authority is using 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 to educate renters on responsibilities necessary to become successful tenants with stable housing. Lincoln Housing Authority formed 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.

Using certified trainers, RentWise teaches the knowledge and skills to be a successful renter and the issues that lead to problems for tenants. RentWise teaches participants how to secure and maintain safe and affordable rental housing. The six-module program is offered at no cost to

participants and 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; and how to improve the rental experience, manage money, and information on legal rights and responsibilities. The 12-hour curriculum uses lectures, workbooks, worksheets, demonstrations, and question & answer formats.

The Lincoln RentWise Network offers the six module educational series 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.

#### **UPDATE ON STATUS OF ACTIVITY**

This activity was implemented October 1, 2011. Each twelve-hour series is scheduled over three days and each series is scheduled either once or twice a month. The program allows for 60 registrants per session. The number of classes offered is sufficient to meet the registration requests. RentWise is a pre-housing activity and participants are determined as income-eligible for RentWise based on self-declaration of income.

The program has been very well received by tenants and landlords. Some landlords offer incentives to RentWise graduates such as waiver of application fee or reduced deposit. LHA offers a secondary preference for the voucher program for RentWise graduates.

We have had increased requests for interpreters for the RentWise program. In order to more efficiently use interpreters and manage costs as well as reduce the distractions of having interpreters in a classroom setting, LHA obtained local grants for specialized equipment to be used by interpreters and participants.

In the fiscal year ending March 31, 2024 166 households completed the Rentwise program. Over the history of RentWise, 46.8% of those who register complete all requirements of the program. 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 rental market, and their connections to the community. The RentWise program improves the knowledge base and thereby increases housing choice.

## **APPLICATION OF ACTIVITY TO SPV TYPES**

## **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

## **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.

## **Initiative 8**

### **ACTIVITY: RESIDENT SERVICES PROGRAM**

<b>Program Affected:</b>	HCV Program
<b>Plan Year Identified:</b>	FY 2012
<b>Plan Year Approved:</b>	FY 2012
<b>Plan Year Implemented:</b>	FY 2012
<b>Statutory Objectives:</b>	Increase housing choice for low income families

#### **DESCRIPTION OF ACTIVITY**

The resident services program provides outreach, case management, service coordination, and supportive services to tenants who are frail elderly or disabled and residing at Crossroads House apartments. Through an interlocal agreement, the program is operated by the Lincoln Area Agency on Aging (LAAA). 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.

The resident services 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.

A Professional Assessment Committee (PAC) reviews 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.

A service coordinator provides general case management and referral services to all potential participants in the program and provides referrals to the PAC of those individuals who appear eligible for the program. The service coordinator educates residents about the services available, assists with applications, and monitors ongoing services. The service coordinator also 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.

The LAAA contracts with qualified providers to furnish participants with supportive services including personal care, transportation, and housekeeping services. These three services are 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. 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.

#### **UPDATE ON STATUS OF ACTIVITY**

LHA continued this initiative in the past year through an interlocal agreement with Lincoln Area Agency on Aging. The most recent annual report shows there were 54 individuals receiving service coordination in the program. There are 24 individuals who were at high risk for a higher level of service but were able to continue in independent living with supportive services. Without these supportive services, these 24 individuals would likely move to assisted living or nursing home care. This results in substantial savings of Medicaid dollars to remain in independent living versus assisted living or nursing home care.

Through service coordination, 50 residents also received assistance with services not funded

under this program. The service coordinator explains services and benefits to residents and families, communicates and problem solves 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.

#### **APPLICATION OF ACTIVITY TO SPV TYPES**

#### **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

#### **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics and only report on local metrics.



## **Initiative 9**

### **ACTIVITY: LANDLORD INCENTIVE HAP**

<b>Program Affected:</b>	HCV Program
<b>Plan Year Proposed:</b>	FY 2015
<b>Plan Year Approved:</b>	FY 2015
<b>Plan Year Implemented:</b>	FY 2015
<b>Statutory Objective:</b>	Increase housing choice for low income families

#### **DESCRIPTION OF ACTIVITY**

As an incentive for landlords to participate in the MTW tenant-based voucher program, Lincoln Housing Authority will provide the landlord a one-time additional Housing Assistance Payment (HAP) of \$400 for units that pass on the first inspection and \$200 for units that fail the first inspection to be paid upon the execution of the HAP contract for the new unit and tenant. This HAP payment will be included with all other HAP reported in VMS. The landlord is not eligible for an additional HAP payment if the contract is executed for a transfer in units with the same landlord, or if the contract is executed due to a lease renewal or change. The following properties are also excluded from the additional landlord incentive payment: 1) properties managed or owned by Lincoln Housing Authority, or 2) properties receiving Low Income Housing Tax Credits.

This initiative came from discussions with our Landlord Advisory Committee who identified some of the following burden factors to participating in the voucher program: 1) the HAP contract creates additional paperwork and time, 2) inspection requirements result in repairs to units not otherwise required for a market-rate tenant, 3) landlords take time out of their busy schedule to meet with inspectors for HQS inspections, 4) landlords must wait for their first rental payment until after inspections and contracts are approved rather than on the day the lease is signed, and 5) landlords lose rental revenue while waiting for units to pass inspections. This initiative creates an incentive that recognizes these barriers and compensates the landlords accordingly.

## **UPDATE ON STATUS OF ACTIVITY**

A goal of this initiative is to maintain or increase the number of landlords participating in the voucher program. Given the competitive rental market in Lincoln, landlord participation has been decreasing which is making it more difficult for voucher holders to obtain affordable housing. Adding participating landlords increases the success rate for vouchers issued and shortens the time it takes to lease a voucher.

After the implementation of the original \$150 Landlord incentive, the voucher success rate improved by from 60% to 77% and the voucher lease time improved during the first 60 days of voucher issuance. The success rate since declined to around 71%, and LHA increased the incentive payment from \$150 to \$200 effective April 1, 2020. While we did not see an increase in the success rate, the rate had also did not decline further. The incentive increased again to \$400 for units that pass on the first inspection and remain at \$200 for units that fail the first inspection. The increased was to not only try to increase new landlords and better utilize existing landlords but to also improve the success rate in passing inspections on the first inspection.

The initial improvements with the voucher leasing success rate and faster leasing time are quite impressive considering the challenges of Lincoln's rental market. Prior to the implementation of the Landlord HAP Incentive, 60% of the vouchers issued were leased. Data from the last fiscal year shows 63% of the vouchers issued were leased, which was likely impacted by significant rent increases in the community. With the increased incentive and the increased payment standard the expectation is the success rate will climb.

## **APPLICATION OF ACTIVITY TO SPV TYPES**

This Landlord Incentive rule applied to all SPVs.

## **PROPOSED NON-SIGNIFICANT CHANGES OR MODIFICATIONS**

No Changes

## **CHANGES OR MODIFICATIONS TO THE METRICS, BASELINES OR BENCHMARKS**

For this initiative, LHA will discontinue reporting on standard metrics.

**B: NOT YET IMPLEMENTED**

All approved activities have been implemented.

**C: ON HOLD**

All approved activities have been implemented.

**D: CLOSED OUT**

No approved activities have been closed out.

## V. Sources and Uses of Funding

### A. PLANNED APPLICATION OF MTW FUNDS

#### i. Estimated Sources of MTW Funds

FDS Line Item Number	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$990,500
70600	HUD PHA Operating Grants	\$19,277,788
70610	Capital Grants	\$645,900
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	\$133,200
71600	Gain or Loss on Sale of Capital Assets	0
71200+71300+71310+71400+71500	Other Income	\$136,500
70000	Total Revenue	\$21,183,888

#### ii. Estimated Application of MTW Funds

FDS Line Item Number	FDS Line Item Name	Dollar Amount
91000(91100+91200+91400+91500 +91600+91700+91800+91900)	Total Operating - Administrative	\$1,612,300
91300+91310+92000	Management Fee Expense	\$866,800
91810	Allocated Overhead	0

92500 (92100+92200+92300+92400)	Total Tenant Services	\$97,100
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$33,300
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$930,100
95000 (95100+95200+95300+95500)	Total Protective Services	0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$93,400
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$520,800
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	0
97100+97200	Total Extraordinary Maintenance and Capital Fund Expenditure	\$645,900
97300+97350	HAP + HAP Portability-In	\$16,384,188
97400	Depreciation Expense	\$360,000
97500+97600+97700+97800	All Other Expense	0
9000	Total Expenses	\$21,543,888

**Description of any variance between Estimated Total Revenue and Estimated Total Expense:**

Uses of MTW Funding exceed Estimated Sources of MTW Funding for the Fiscal Year by \$360,000. Depreciation is a non-cash expense and shown at \$360,000 under Estimated Uses.

MTW Funding Sources, after removing the non-cash expense of depreciation, equals Uses of MTW Funding.

**iii. Description of Planned Application of MTW Funding Flexibility**

See Section IV, Initiatives 7 and 8

Upon conversion of the remaining Public Housing to project-based vouchers under the Section 18 disposition process, LHA will transfer and/or use any remaining Public Housing operating reserves or capital funds for the operation of the converted public housing units until those funds are depleted.

In addition, following conversion of Public Housing units under Section 18, LHA anticipates receiving Asset Repositioning Funds (ARF) and Demolition Disposition Transitional Funding (DDTF). LHA will utilize the funds for capital improvements at the converted public housing properties, supplement voucher program administrative or HAP costs, or keep the funds in reserve for future use.

**(IV.) PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING**

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$6,574,178	\$2,000,000 Emerald View II \$60,000 BUF \$4,514,178 HAP
HCV Admin Fee	\$2,152,626	\$2,152,626 Admin Expenses
PH Operating Subsidy	\$402,326	\$402,326 PHG Op Expenses
<b>TOTAL:</b>	<b>\$9,129,130</b>	<b>\$9,129,130</b>

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

HCV HAP: \$2,000,000 To be used for development of a LIHTC project – Emerald View II.

HCV HAP: \$60,000 to be used for Broader Uses of Funds – CHSP and Rent Wise

HCV unspent HAP balance of \$4,514,178 will be available for HAP expenses.

HCV unspent Admin Fee will be available to offset future losses in operating the program.

Unspent PH Operating Subsidy will be used to establish reserves for the properties transitioned under Section 18.

**(V.) LOCAL ASSET MANAGEMENT PLAN**

- i. Is the MTW PHA allocating costs within statute? YES**
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)? NO**
- iii. Has the MTW PHA provided a LAMP in the appendix? NO**
- iv. If the MTW PHA has provided a LAMP in the appendix, describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year: Not Applicable**

**(VI.) RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION**

**i. Description of the RAD Participation**

LHA submitted its application for the RAD program on August 31, 2018. Lincoln Housing Authority plans to convert assistance of most of its 320 public housing units (AMP 1, AMP 2, and AMP 3) to Section 8 Project-based Vouchers which will be administered by LHA under a Voucher Annual Contributions Contract (ACC) and the Moving To Work Agreement. LHA created a nonprofit controlled affiliate, Lincoln Public Housing, Inc, to serve as the legal ownership entity. We have completed the RAD conversion for Mahoney Manor as of October 1, 2019.

LHA plans to convert the remaining Family Scattered Site Public Housing units to project-based vouchers under the Section 18 Disposition of Public Housing requirements in FY2025-26.

In addition to the above description, refer to Appendix F for further RAD information.

**ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix?**

Yes, See Appendix F

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

The RAD Significant Amendment in Appendix F is substantially the same as the one submitted in the MTW Annual Plan for fiscal year 2021-2022.

## **VI. Administrative**

### **A. Board Resolution Adopting the Annual MTW Plan Certification of Compliance**

See TAB 1 Appendix A

### **B. Documentation of Public Process**

As a part of the Moving To Work Annual Plan public process, the Housing Authority of the City of Lincoln, Nebraska published two notices of the public hearing in the city's only newspaper. The first public notice was published in the Lincoln *Journal-Star* on October 31, 2024, and a second notice was published on December 5, 2024. Both notices informed the public of the December 12, 2024 public hearing for the FY 2025-2026 Moving To Work Annual Plan. Each public notice provided information on how citizens could obtain and review a draft copy of the proposed Moving To Work Annual Plan. A copy of the draft Plan was available for review at five (5) public libraries located throughout the city of Lincoln. The draft Plan was also available for review on the LHA website: [www.L-housing.com](http://www.L-housing.com). Printed copies were available in LHA's main office lobby and LHA's Carol M. Yoakum Family Resource Center.

The Lincoln Housing Authority's Resident Advisory Board met on November 12 and 19, 2024 to review the details of the Plan including the proposed Capital Fund budget, the MTW initiatives, and proposed changes to the Section 8 Administrative Plan and Admissions and Continued Occupancy Policy. Each Resident Advisory Board member received a full copy of the plan. Minutes of both meetings are inserted under Tab 1, Appendix G.

A public hearing was held on December 12, 2024.

The Plan was submitted to the LHA board for final approval on January 9, 2025. The board passed a resolution approving the FY 2025-2026 Moving to Work Annual Plan.

### **C. Planned or Ongoing PHA-Directed Evaluations of the Demonstration**

Not Applicable

### **D. Lobbying Disclosures**

See TAB 1, Appendix D

### **E. Capital Fund Program:**



## **Annual Statement/Performance and Evaluation Reports**

See TAB 1, Appendix E

### **F. LHA Request and HUD Approval Letters Regarding VASH and Emergency Housing Voucher Program under MTW**

See TAB 1, Appendix C

### **G. Violence Against Women Act (VAWA)**

Lincoln Housing Authority's program policies and procedures intend to support or assist victims of domestic violence, dating violence, sexual assault, or stalking. The following policies or activities have been established to support these victims.

- \* LHA collaborates with all domestic violence agencies. Applications are made available at the local shelter. Domestic violence staff is provided an opportunity to be trained by LHA staff on how to complete on-line applications. The use of on-line applications allows the applications to be expedited and allows the victim to stay in their secured environment. LHA provides a grant to a local domestic violence agency and provides 13 transitional housing units and 12 single family shelter units for domestic violence victims.
  
- \* A preference is established for the Public Housing and Housing Choice Voucher waiting lists for domestic violence victims.
  
- \* The domestic violence victim retains their voucher during a household separation.
  
- \* Housing Choice Voucher participants are able to port-out their vouchers out of the LHA jurisdiction for domestic violence or other safety reasons.
  
- \* LHA has adopted emergency transfer plans for the Housing Choice Voucher program and for all LHA properties. Families are allowed to transfer their voucher from the contracted unit during a 12-month period if the family is fleeing for their safety which requires relocation.
  
- \* LHA reviews police activity in all units owned by LHA or assisted by Section 8 monthly to determine the need for family support services. A LHA Family Support

Worker will contact the victim to assist with obtaining the appropriate resources.

- \* Through the City of Lincoln's Urban Development Department, LHA provides security deposit assistance to homeless domestic violence victims that are voucher participants.
  
- \* Through the Housing Choice Voucher program, a Homeless program has been established with homeless agencies. The local domestic violence agency is a committee member and case manager for this Homeless program. The Domestic Violence case manager provides referrals to the program. This program allows the victim to receive a specialized voucher and provide supportive assistance to stabilize the family.
  
- \* During Public Housing admissions and Housing Choice Voucher program admissions, eligibility denial, and program terminations, participants are notified of the VAWA and provided the HUD form 5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and HUD form 5380 Notice of Occupancy Rights under the Violence Against Women Act.
  
- \* Landlords participating in the voucher program are notified of the VAWA responsibilities via the HAP contract and newsletter. The HUD form 5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking is added to each new HAP contract.

## **H. Assessment of Fair Housing**

In accordance with HUD's Affirmatively Furthering Fair Housing rule, LHA entered into a Collaboration Agreement with City of Lincoln and completed an Assessment of Fair Housing (AFH). The City of Lincoln was the lead entity and submitted the AFH to HUD in December 2017. Following submission, HUD delayed implementation of the rule and did not review, approve or comment on Lincoln's AFH.

## **I. Smoke-free Public Housing**

HUD's Smoke-Free Public Housing Rule required that all Public Housing units must be covered by smoke-free policies by July 30, 2018. Lincoln Housing Authority

Implemented HUD'S rules effective June 1, 2018.