2023
ANNUAL PLAN

DRAFT

MOVING TO WORK

Keene Housing

AFFORDABLE HOUSING ACCREDITATION BOARD
ACCREDITED 2020-24

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Submitted to HUD:

Section I. Introduction

As we look ahead to 2023, we are disappointed to find that last year's hope for a long overdue federal reinvestment in affordable housing was unwarranted. We were buoyed by the prospect that the Build Back Better initiative, with its promise of hundreds of thousands of new vouchers, expansion and streamlining of the Low-Income Housing Tax Credit program, and recommitment to Public Housing's capital program might actually come to pass. Unfortunately, as we draft this year's Plan, it appears that the federal government is unable to take bold action to meet the nation's affordable housing crisis, and instead will settle for incremental improvements that are appreciated but will do little to stem the socio-economic crises caused by our nation's affordable housing shortage.

We count ourselves lucky, though, that we have the flexibilities that our participation in Moving to Work (MTW) provides us. We are grateful that we can leverage these flexibilities to help address the housing crisis locally in ways that other affordable housing providers, especially fully regulated Public Housing Authorities (PHAs) cannot. Even in the face of a historic lack of affordable housing stock evidenced by voucher holders still struggling to find apartments to rent, we are using MTW to pursue the objectives Congress created when they created the program in 1996:

- Reducing cost and achieve greater cost effectiveness in Federal expenditures;
- Giving 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
- Increasing housing choices for low-income families.

KH'S LONG TERM VISION

Keene Housing's (KH) long term goals are described in our Strategic Plan. Our Strategic Plans are developed every five years in collaboration with our Board of Commissioners, staff, residents, voucher holders and partners both local and national. Our current Strategic Plan covers the five-year period beginning in 2020. Each December the Board of Commissioners and staff revisits the Strategic Plan to take stock of our progress, and to make any revisions deemed necessary by emerging opportunities or risks. A copy of the updated Strategic Plan is attached to this Annual Plan for review.

KH'S SHORT-TERM GOALS

We are seeing the affordable housing crisis play out in real time in our small corner of the Granite State. Despite our best efforts to provide private market owners incentives to participate in our voucher programs, our utilization rates remain stubbornly low. Voucher holders who are traditionally hard to house, most notably our Mainstream and Non Elderly Disabled voucher holders, are especially affected by the lack of rental housing. There is no doubt that the region's lack of affordable housing stock is chronic, and that we must aggressively seek opportunities to develop additional housing. The pursuit of appropriate parcels for development is our single most urgent goal for 2023 and beyond. We hope to secure at least one such parcel this year and one additional parcel in 2024. We expect that our MTW flexibility will be critical in securing and developing any new affordable housing.

Although our development activities are central to our short-term plans, we are also excited to move ahead in 2023 with Homes for School Activity (2023.01.HC.) Homes for School is a housing first initiative developed in partnership with the Keene School District (KSD). The program intends to demonstrate that providing homes to unhoused elementary school children will reduce truancy and improve their academic performance. Coordinating with KSD's McKinney Vento

Coordinator, KH will provide housing search and stabilization services and housing assistance to unhoused students' families. Other regional service and healthcare providers will engage with adult household members to help them be successful renters, and strong supporters of their children's educations.

Homes for School will begin slowly. KH and KSD will pilot the program at two Keene elementary schools, Symonds and Franklin. KSD will track students' academic outcomes and KH will track each household's programmatic and lease compliance. After a year or two, depending on what the data and our partners tell us, we will decide whether to expand the initiative to additional schools – if funding permits - or to end it.

Finally, we will continue reinvesting in our existing portfolio including the reconstruction of the community and office building at 105 Castle Street, which was lost to fire in 2020. All of our reinvestment and development efforts include a focus on energy efficiency and renewable energy production, as we strive to reach our goal of achieving carbon neutrality by 2035.

We look forward to a very busy 2023 as we move beyond COVID-19 with all its interruptions and organizational distractions. We are anxious to refocus on moving our mission forward, and we are thankful that we have MTW to help us do it.

Section II. General Operating Information

HOUSING STOCK INFORMATION

Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

Asset Management Project (AMP) Fill In Name And Number	0/1 Bdm						Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A	0	0	0	0	0	N/A	0	0
Housing Units to be Added in the Plan Year:						0		

** The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf*

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

If "Population Type" is "Other" please describe:
KH does not anticipate adding any new public housing units in 2023.

Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP Name and Number	Number Of Units To Be Removed	Explanation For Removal
N/A	0	N/A. KH does not own any public housing units.
Total: Public Housing Units to be Removed in the Plan Year	**0**	

Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

Property Name	Number Of Vouchers To Be Project-based	RAD?	Description Of Project
N/A	0	N/A	N/A
Total: Planned new Project Based Units in Plan Year	**0**		

Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Select one of the of the following to

indicate the *"Planned Status by the end of the Plan Year: "Committed," "Leased," or "Issued." In column three, indicate whether the unit is included in RAD.

Property Name	Number Of Project-based Vouchers	Planned Status At End Of Plan Year*	RAD?	Description Of Project
Ash Brook Apartments	24	Leased	No	24 1-bedroom row/townhouse style units
Brookbend East	11	Leased	No	40 LIHTC/MF two and three bedroom townhouse style units with HAPC for 11 units
Brookbend West	10	Leased	No	35 LIHTC/MF two and three bedroom townhouse style units with HAPC for 10 units
Cottage Street	3	Leased	No	3 two- and three-bedroom units with a HAPC for all 3 units
Emerald Street	9	Leased		9 single room units with shared common areas. Housing for patients transitioning out of the state hospital
Evergreen Knoll	3	Leased	No	32 LIHTC/RD two- and three bedroom townhouse style units with a HAPC for 3 units
Keene Affordable Housing Properties	212	Leased	No	212 former public housing units with a HAPC for 212 units
Riverbend	24	Leased	No	24 LIHTC two and three bedroom townhouse style units with a HAPC for 24 units
Scattered Sites 2	30	Leased		30 units of various size and style throughout Cheshire County with a HAPC for 30 units
Stone Arch Village Family	24	Leased	No	24 LIHTC two and three bedroom townhouse style units with a HAPC for 24 units
Stone Arch Village Senior	33	Leased	No	33 senior/disabled one and two bedroom units in mid-rise building with a HAPC for 33 units
Hampshire House	18	Leased	No	18 single room occupancy units
Total: Planned Existing Project-Based Vouchers	**401**			

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

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

Planned Other Changes To MTW Housing Stock Anticipated In The Plan Year
KH is partnering with Monadnock Family Services to provide a shallow subsidy for 6-bed transitional housing using the THASP Activity (1999.06.HC).

General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

General Description Of All Planned Capital Expenditures During The Plan Year
The planned capital improvement consists of the rehabilitation of several scattered site units with energy saving initiatives. There are also plans for a large-scale replacement of the old heating system at a North and Gilsum Apartments by installing a new energy saving heat pump systems. There are several planned smaller improvements consisting of roof replacements, hot water boilers replacements and security equipment upgrades also being planned.

LEASING INFORMATION

Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

Planned Number Of Households Served Through:	Planned Number Of Unit Months Occupied/Leased*	Planned Number Of Households To Be Served**
MTW Public Housing Units Leased	0	0
MTW Housing Choice Vouchers (HCV) Utilized	7044	587
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	1020	85
Local, Non-Traditional: Homeownership^	48	4
Planned Total Households Served:	**8112**	**676**

* "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.

**"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.

^ 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 Household To Be Served**
Tenant-Based	N/A	0	0
Property-Based	THASP 1999.06.HC	1020	85
Homeownership	MTW Homeownership Flat Subsidy 2005.03. HC	48	4

* 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.

Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

Housing Program	Description Of Anticipated Leasing Issues And Possible Solutions
MTW Public Housing	KH has no units of public housing
MTW Housing Choice Voucher	Competition for rental units and increasing rents and extensive tolling times and rents that are available too high are continued to be anticipated issues to leasing in 2023. KH did create a landlord incentive program (2022.01.HC) and our exploration of the feasibility of starting a scattered site acquisition program (2014.05. HC and 2008.01.HC) will continue into 2023.

Housing Program	Description Of Anticipated Leasing Issues And Possible Solutions
Local, Non-Traditional	The Southwestern Community Services (SCS) Emergency shelters continue to operate at or near full capacity, a fact that demonstrates the need for maintaining housing support services. Using only Cheshire County numbers, SCS served 182 clients in 2019, 210 clients in 2018, and 166 in 2017. SCS did see drastic reductions in the number of clients in 2020 and 2021 as the shelters reduced capacity to meet CDC guidelines but still able to serve 101 and 113 clients, respectively. The local numbers represent a continuing homeless crisis at a state and federal level. New Hampshire's Point in Time count which measures the state's homeless population on the last Wednesday of January has seen a low of 1,366 homeless NH residents in 2016 to 1,675 residents in 2020. The number of homeless NH residents during the 2020 Point In Time count was the highest since 2008. The Federal Point In Time numbers of overall homeless have steadily increased from 550,996 in 2017 to 580,466 in 2020. The Monadnock Community has seen an increase in homelessness. According to 2020 data, The City of Keene averages more than 4 times the state's estimated 12.3 homeless individuals per 10,000 citizens. Between Sullivan County and Cheshire County, SCS served 274 clients in 2021. It's expected that the numbers will be similar in 2023. There may actually be a reduction in 2023 as more clients stay longer in the shelters. With less turnover due to increased rents and a less than one percent vacancy rate, there may be less unduplicated clients and the average length of stay may surpass four or five months. The capacity at the shelters is somewhat fixed and as the need for shelter grows, we are seeing an increase in unsheltered clients as beds remain utilized by others for longer periods of time.

WAIT LIST INFORMATION

Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

Waiting List Name	Description	Number Of Households On Waiting List	Waiting List Status (Open, Partially Open Or Closed)	Plans to open the waiting list during the Plan year
MTW Project-Based Voucher	Site-based	1,516	Open	N/A
MTW Housing Choice Voucher	Community-based	2,222	Open	N/A
PBV Mobility	Site-based	129	Partially Open	N/A

Duplication of applicants across waiting lists:
Eligible applicants may apply to both site-based and community-based waiting lists and be placed on both.

Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

Waiting List Name	Description Of Planned Changes To Waiting List
Project-Based Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.
Tenant-Based Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.
Project-Based Mobility Housing Choice Voucher	KH does not plan to make any changes to this waitlist in the Plan year.

Section III. Proposed MTW Activities

2023.01.HC HOMES FOR SCHOOL

The proposed program is a partnership between KH and the Keene School District (KSD). Homes for School is a housing first model predicated on the supposition that unhoused elementary school children will perform better in school when they are housed. Homes for School will begin as a pilot in two Keene elementary schools, Franklin and Symonds Schools. Homes for School will provide unhoused students' households a deep housing subsidy, housing search and stabilization services. After two years of successful participation in Homes for School, households will be offered an MTW Housing Choice Voucher. Successful Homes for School households are those whose students attend school regularly, whose adult members actively participate in their students' educations while adhering to their lease and program obligations.

Noteworthy program features include:

Eligibility and Rent Determination

- KSD's McKinney-Vento Liaison, KH staff and each student's parent(s) or guardian(s) must review and execute a "Homes for School Compact" that describes each party's commitment to each other and to the student(s)
- Households must meet Housing Choice Voucher program statutory requirements and/or prohibitions related to income, sex offender and immigration status, and methamphetamine production in federally assisted housing
- Similar to households in Step 1 of the Stepped Subsidy Rent Reform (1999.04.CE) program, participants pay 20% of gross income towards rent throughout their time in the program
- $125 minimum rent
- Unlimited interim recertifications
- Income recertified annually

Continued Participation:

- Student parent(s) or guardian(s) must adhere to the "Homes for School Compact"
- Participating households must remain in compliance with their lease and KH's Obligations of the Family

Length of Participation:

- After two years, households that successfully participate in Homes for School will be offered a MTW Housing Choice Voucher, subject to the applicable MTW Housing Choice Voucher eligibility requirements.

KH and KSD will begin meeting with unhoused Symonds and Franklin School families at the beginning of fiscal year 2023.

Metrics

HC #1

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unit of measurement: number of new housing units made available for households – in this case homeless households - at or below 80% AMI as a result of this activity.	0	5	25	-

KH Metric #1: Reduced Truancy

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unit of measurement: median number of unexcused absences of unhoused Franklin and Symonds School students	-	-	-	

KH Metric #2: Improved Academic Performance

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unit of measurement: median scores on standardized tests of unhoused Franklin and Symonds School students	-	-	-	

KH Metric #3: Improved Behavior in School

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Unit of measurement: median number of disciplinary actions taken against unhoused Franklin and Symonds School students	-	-	-	

Data will be collected from KSD's McKinney Vento Coordinator and KH's enterprise software.

Cost Implications

The annual expense for this program is estimated to be $355,500.

Need/Justification for MTW Flexibility

Per Attachment C B. 4. of the Amended and Restated Moving to Work Agreement KH may develop and adopt new short-term transitional housing programs, consistent with an eligible use of section 8 funds, with supportive services in one or more buildings in collaboration with government agencies. This authorization waives certain provisions of Sections 3, 4, 5, 8, and 9 of the 1937 Act and 24 C.F.R. 941, and 960 Subpart B as necessary to implement KH's Annual MTW Plan. Further, per Attachment C D. 2. a. of the Amended and Restated Moving to Work Agreement KH is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement KH's Annual MTW Plan. Finally, per Attachment C D. 3. b. of the Amended and Restated Moving to Work Agreement KH is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement KH's Annual MTW Plan.

Rent Reform Information

Impact Analysis

The activity does not affect any current participants therefore there is no impact on existing households. However, as described above, participating households will pay 20% of their gross income in rent. It is reasonable to assume, then, that these households will not be rent burdened. It is conceivable that some participants paying the $125 minimum rent may, pursuant to KH's MTW Administrative Plan, be eligible for a rent reduction through the Safety Net process.

As with all rent reform activities, KH will monitor participant rent burdens during interims and recertifications to ensure that there is no pattern of rent burdened participants or other unintended consequences of the rent reform aspects of the activity.

Hardship Case Criteria

As described above, participating households will have access to Safety Net. The Safety Net portion of the MTW Administrative Plan is provided in Appendix II of this Plan.

Description of Annual Reevaluation

With its generous subsidy, KH does not anticipate that this activity have any negative effect on participants, particularly considering that absent this activity they would likely receive no housing assistance from KH whatsoever. None-the-less, as described above, KH will monitor rent burdens quarterly and if, at the end of any fiscal year, it appears that there are unintended negative consequences KH will either make adjustments to the initiative's rent setting policies or terminate the initiative completely.

Transition Period

As described earlier, this activity is new. There is no transition period. Households will begin being admitted at the start of fiscal year 2023.

Section IV. Approved MTW Activities

ACTIVITY NUMBERING SYSTEM

KH utilizes a numbering system to assist readers in finding specific activities or identifying an activity's purpose. The Plan approval year is the first section of the activity number. The second number refers to the activity number for that year. The final two letters indicate the statutory objective the activity relates to – Housing Choice (HC), Cost Effectiveness (CE), and Self-Sufficiency (SS). In cases where an activity falls under more than one objective, KH's primary goal in initiating the activity is used.

IMPLEMENTED ACTIVITIES

2022.01.SS BROADBAND UTILITY ALLOWANCE

Plan Year Approved: 2022 Year Implemented: 2022

The proposed Broadband Utility Allowance will increase working households' voucher holders' housing choices by providing an allowance to offset the cost of high-speed internet access. It is widely recognized that lack of access to high-speed internet prevents low-income households from employment and educational opportunities readily available to households that can afford high speed access. During the COVID-19 pandemic KH used CARES Act funds to subsidize internet access for families with children attending remote schooling and working households. This assistance was widely praised by participating households and proved a productive use of the funding. With CARES Act funding ending in 2021, KH will begin providing a $40 per month utility allowance to all households participating in the Resident Self Reliance program (1999.05.SS) at the start of fiscal year 2022.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2022.02.HC OWNER RECRUITMENT & RETENTION PROGRAM

Plan Year Approved: 2022 Year Implemented: 20022

The proposed Owner Recruitment and Retention Program will increase voucher holders' housing choices by providing financial incentives for property owners to participate in KH's voucher programs. Owners agreeing to rent their units to a voucher holder after a voucher holder vacates the same unit will be eligible for a $500 "Re-signing Bonus". Owners not currently renting to a voucher holder will receive a $1000 "Signing Bonus" for joining or rejoining the voucher program. This program began in late 2021 with non-federal funds. MTW funds will be used for this activity at the start of Fiscal Year 2022.

KH's Finance Department will track the number of re-signing bonuses paid out each year. A total of eighteen (18) landlord incentives where disbursed in 2022 as of the submission of this Plan. Twelve (12) landlords re-rented to voucher holders and six (6) are new landlords participating in the voucher program for the first time totaling twelve thousand ($12,000) dollars in landlord incentives disbursed.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2022.03.SS KEENE HOUSING - CHESHIRE COUNTY DRUG COURT PATHWAY HOME

Plan Year Approved: 2022 Year Implemented: 2022

The proposed program is a partnership between KH and the Cheshire County Drug Court (CCDC). The Drug Court is an alternative sentencing program for low level drug offenders. The CCDC program provides participants with a set of goals and supportive services that, in aggregate, significantly reduces the likelihood of recidivism. However, CCDC staff believes that a lack of stable, affordable housing contributes to some participants' failure to complete the program. By providing CCDC participants stable housing during their time in the program, and a clear path to a MTW Housing Choice Voucher upon program completion, this activity is intended to improve CCDC participants' success rates. Successful CCDC participants are those who move from substance abuse and potential incarceration to steady employment, stable housing and a trajectory towards relative economic self-sufficiency.

Noteworthy program features include:

Eligibility and Rent Determination

- Similar to the THASP program (1999.06.HC) referrals and initial eligibility screening made by CCDC staff
- Applicants must meet Housing Choice Voucher program statutory requirements related to income, sex offender and immigration status, and meth amphetamine production in federally assisted housing
- Applicants must apply for KH's MTW Housing Choice Voucher program
- Participants are automatically enrolled in KH's Resident Self Reliance Program (1999.05.SS)
- Similar to households in Step 1 of the Stepped Subsidy Rent Reform (1999.04.CE) program, participants pay 20% of gross income towards rent throughout their time in the program
- $125 minimum rent
- Unlimited interim recertifications
- Income recertified annually

Continued Participation:

- Participants must adhere to CCDC program requirements
- Participants must remain in compliance with their lease and KH's Obligations of the Family

Length of Participation:

- CCDC participation can last between 375 days and 3 years
- Housing assistance will continue from initial enrollment through CCDC program completion
- CCDC participants who successfully complete the program will receive a preference on KH's MTW Housing Choice Voucher program waiting list

KH will begin accepting program referrals at the beginning of fiscal year 2022.

Changes Proposed for FY2023

KH proposes no changes to this activity in 2023

1999.01.HC ELIGIBILITY ADMINISTRATION GUIDELINES

Plan Year Approved: 2000 Year Implemented: 2000

KH uses a two-tiered system for determining eligibility for our MTW HCV program. First, we calculate a household's anticipated income by applying all applicable income sources as described at 24 C.F.R. 5.609. If the calculated income is 80% Area Median Income (AMI) or less, the household is eligible for assistance under the first threshold. KH then applies an asset threshold of $100,000 as a second layer for eligibility determination. Applicant households with assets of $100,000 or more are not eligible for assistance even if the applicant's anticipated income falls at or below the 80% AMI threshold.

The $100,000 asset threshold does not apply to inaccessible assets, such as irrevocable trusts. KH applies income from inaccessible assets to a household's income for determining income eligibility as if this threshold did not exist.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.03.CE RENT REASONABLENESS NEIGHBORHOOD ANALYSIS DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

To comply with C.F.R. 24 902.507, Public Housing Authorities (PHAs) typically develop and maintain, or purchase, a database of rental units in the PHA's jurisdiction which they use to determine if an owner's proposed rent is reasonable compared to similar, unassisted units. Developing a reasonableness database often requires extensive administrative time or is accompanied by the high costs of hiring an outside contractor to provide the necessary data. KH found that the high annual administrative and financial costs of this task provided little value, as the region's rental market varies little from year to year and almost not at all across neighborhoods.

Dictating to participants what is a reasonable rent is also contrary to KH's philosophy of empowering participants to make decisions based on their needs, rather than to comply with arbitrary requirements set by KH or HUD. It is KH's belief that the household, not KH, is the best judge of what an appropriate rent is (see 40% Affordability Discontinuance activity on page 13). To ensure HCV holders are not being charged unreasonable rents, KH compares our participants' rents against the Market Analysis released regularly by the New Hampshire Housing Finance Authority.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.07.HC REASONABLE RENT DETERMINATION DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

KH believes that the determination of rent reasonableness for a unit is best left in participants' hands, as determined by each household's priorities, income, and needs. However, for many participants that are elderly, disabled, or newly leased up from the wait lists, finding appropriate housing can be more difficult.

To balance these needs, KH determines rent reasonability for MTW voucher holders participating in our Income Based and Non Elderly Disabled programs and Step 1 Stepped Subsidy participants. For these households, we utilize the Rent Reasonableness Determination protocol used by New Hampshire Housing Finance Authority (NHHFA) to determine rent reasonableness. NHHFA administers a statewide Housing Choice Voucher program and their Rent Reasonableness tool, which is updated annually using data collected through their statewide rent survey, includes Cheshire County-specific data. NHHFA allows us to use their protocol at no cost to KH.

For households in Step 2 or Step 3 of the Stepped Subsidy Program, KH empowers participants to determine the reasonableness of the asking rent based on their own needs and priorities. KH staff educates Stepped Subsidy participants on how factors relating to rent reasonableness – such as location, unit size, unit type, accessibility, amenities, tenant paid utilities, and maintenance – contribute towards a reasonable rent, and provides support, if necessary, during the participant's negotiations with the owner.

KH does not execute Housing Assistance Payment (HAP) contracts or negotiate rents with owners on any participants' behalf, regardless of type of, or duration in, an HCV program. Instead, KH pays the HAP directly to the participant with the understanding that the participant is expected to pay full rent, not just their portion, to the owner. Participants who fail to pay their full rent are subject to eviction, removed from the HCV program, and any remedies available to KH for recovering misspent HAP.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.08.HC 40% AFFORDABILITY DISCONTINUANCE

Plan Year Approved: 2000 Year Implemented: 2000

KH does not require participants to maintain a rent burden of less than 40% when leasing a unit or negotiating rents with an owner. Instead, we allow the participant to be the judge of his or her priorities in relation to housing choice and rent burden. Participants are counseled during the issuance briefing on acceptable rent burdens relative to rent reasonableness and the consequences of choosing a unit that creates a high rent burden. Once a unit is chosen, KH calculates the proposed rent burden and, if it exceeds 40%, KH allows the participant an opportunity to demonstrate how they will afford their rent without sacrificing other household necessities. Households whom KH permits to lease–up with a rent burden exceeding 40% are not eligible for Safety Net unless an unanticipated change in circumstances, such as income loss or change in household composition, causes a rent burden in excess of their rent burden at lease-up.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2005.03.HC MTW HOMEOWNERSHIP FLAT SUBSIDY

Plan Year Approved: 2005 Year Implemented: 2005

Keene Housing provides participants interested in homeownership the opportunity to purchase a home while keeping their MTW HCV through the MTW Homeownership Program. KH's program generally mirrors the traditional

HUD homeownership program by requiring households to meet specific requirements in order to be eligible for the program, including homeownership counseling. Under the traditional HUD homeownership program, a non-elderly, non-disabled household may receive assistance for up to 15 years on a 20 year or longer mortgage (10 years for a shorter mortgage). This assistance continues regardless of income after the initial income eligibility determination.

In our experience, the lengthy approval process sometimes results in an eligible household finding themselves over the 80% AMI threshold by the time a home is located and a lender secured. Additionally, households sometimes increase their income above 80% AMI after obtaining a home.

While KH believes that supporting a household's homeownership goals and maintaining homeownership is important, we also believe that continuing to assist households after they no longer need assistance is contrary to our mission and an inefficient use of tax payer funds. To balance these two goals, in addition to HUD's standard term limits, KH initiated a flat subsidy for households in the program with incomes between 80% AMI and 140% AMI. By adopting both a flat subsidy and term limits, KH promotes participants' efforts to increase financial stability while holding them to a higher standard than HUD's traditional homeownership program.

With the economic and housing market instability in 2008, Keene Housing initiated a policy change that permitted homeownership families to request an interim recertification if their incomes changed. This policy change prevented at least two foreclosures and remains in place.

In 2017, the last year for which full data is available, no new Homeowner Vouchers were issued, although 5 households purchased a home without our assistance. Four households currently participate in the Homeownership program.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.06.HC TRANSITIONAL HOUSING ASSISTANCE SUBSIDY PROGRAM (THASP)

Plan Year Approved: 2000 Year Implemented: 2000

KH's Transitional Housing Assistance Subsidy Program (THASP) helps homeless and hard-to-house individuals

and families access stable housing through partnerships with local service providers. THASP partners receive fixed subsidies to offset the costs of maintaining shelters for the region's homeless, re-entry, and domestic violence populations. In exchange, partners agree that THASP participants do not pay more than 30% of their income for shelter and receive case management and counseling to help gain long-term housing.

THASP has become a critical component of Keene's homeless and domestic violence shelter system. KH provides fixed subsidies for 3 transitional housing programs – a Men's Homeless Shelter, a Family Homeless Shelter, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault. Two of the shelters – the men's shelter, and family shelter – are managed by Southwestern Community Services (SCS), the local Tri-Cap agency.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.04.CE STEPPED SUBSIDY RENT REFORM

Plan Year Approved: 2000 Year Implemented: 2000

In KH's experience, non-elderly, non-disabled households coming off the wait list are often in need of more support and financial assistance than those who have been receiving assistance for a longer period of time. The Stepped Subsidy Rent Reform responds to this need by providing a deep Housing Assistance Payment (HAP), with households only paying 20% of gross income towards rent for the first two years of housing assistance (see table below).

During this time participants are also enrolled in the Resident Self-Reliance (RSR) program (page 17) where they receive supportive services from KH's Resident Service Coordinators (RSCs). Households work with RSCs throughout their time with us to identify barriers to self-sufficiency and to develop a plan for moving towards financial security and, eventually, out of housing assistance.

# BR	VPS	Step 1 HAP	Step 2 HAP (65% of VPS)	Step 3+ HAP (45% of VPS)
SRO	$675	VPS-20% Gross Income = Subsidy	$440	$300
0	$900	VPS-20% Gross Income = Subsidy	$590	$410
1	$1000	VPS-20% Gross Income = Subsidy	$650	$450
2	$1235	VPS-20% Gross Income = Subsidy	$800	$500
3	$1750	VPS-20% Gross Income = Subsidy	$1140	$790
4	$1985	VPS-20% Gross Income = Subsidy	$1290	$890
5	$2283	VPS-20% Gross Income = Subsidy	$1480	$1030

We have found that calculating HAP based upon a household's earnings punishes them for increasing their income by responding to the increased income with an in-kind increase in tenant rent payment. This is a serious disincentive for a household to increase its income and has been found to result in employment instability and under reporting of income. It has also been found to negatively impact a household's ability to save or plan for the future, both of which are contrary to KH's mission.

To promote long-term employment and financial stability, after the first two years of assistance the amount of HAP a household receives is disconnected from their earnings and is instead calculated as a percentage of the voucher payment standard (VPS) the household for which the household is eligible. In Year 3 the household receives a monthly HAP equal to 65% of the VPS. The HAP is reduced again in Year 4 to 45% of VPS.

Stepped Subsidy is mandatory for all non-elderly, non-disabled households in the MTW HCV and PBV programs, although both elderly and disabled households may opt-in to the program. Currently 135 households have their subsidy calculated under the Stepped Subsidy Rent Reform.

Stepped Subsidy households are subject to the Reasonable Rent Determination Discontinuance activity (page 13). HAP is paid directly to the household and it is the household's responsibility to pay the full rent to the owner; KH does not execute a HAP contract with the owner. In addition, all Stepped Subsidy participants are required to participate in the RSR program as long as they receive housing assistance.

For Step 1 and Step 2 households pursuing educational goals in the Resident Self – Reliance program, KH "freezes" a household's progression in the Stepped Subsidy program at their current level if the head of household, spouse, or co-head is:

- Employed at least part-time, and
- Enrolled full-time in a post-secondary program and maintaining a passing GPA, as defined by the institution.

A household's subsidy remains frozen until such time that the eligible participant has completed their educational program, are no longer employed at least part-time, their enrollment drops below full-time, or their GPA drops below passing. In addition, the household must remain in compliance with all other voucher program obligations, including all requirements of the Resident Self-Reliance (RSR) program. Ongoing compliance is reviewed at the household's quarterly RSR meeting. Should KH determine a participant is no longer eligible for the freeze, the household's Step Subsidy progress resumes on the first day of the month after a 30 day notification of non-compliance. There is no limitation on how long a household may remain at the frozen level.

KH monitors rent burden quarterly to ensure participation in Stepped Subsidy does not cause excessive burdens to participating households. On average, 4% of Stepped Subsidy households maintained a burden of 40% or higher in 2020. These households are predominately choosing to rent a unit that exceeds the VPS or unit size for which the household is eligible.

Hardship Case Criteria

The Stepped Subsidy program does not calculate household subsidy based on a participant's income, therefore participants are not eligible for an interim recertification should they experience a decrease in income. As an alternative to the interim recertification process, if a Stepped Subisidy household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program Safety Net provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. Typically, households are required to apply for Safety Net except for short term hardships due to a medical event and are required to meet additional criteria for applications beyond the first month.

Changes Proposed for FY2023

KH proposes no changes to this activity.

1999.05.SS RESIDENT SELF-RELIANCE PROGRAM

Plan Year Approved: 2000 Year Implemented: 2000

Participants in the Stepped Subsidy Program are required to participate in KH's Resident Self-Reliance (RSR) program. RSR's central premise is that to become financially stable and self-sufficient, households must achieve the following five Foundational Proficiencies: Household Stability, Wellness and Healthy Relationships, Education and Training, Financial Management, and Employment and Household Management.

Each household is assigned a Resident Service Coordinator (RSC) who provides service coordination and case management to help participants understand and remove the obstacles keeping them from building wealth and achieving self-sufficiency. The RSCs are funded through HUD's Housing Choice Voucher (HCV) Family Self – Sufficiency (FSS) Grant Program.

Individualized Goal Setting

New participants meet with their RSC to complete an initial Proficiencies Assessment. The assessment helps the household and RSC develop an individualized 3-year Career Plan. The plan includes actionable goals and milestones tailored to the assessment findings, with concrete dates for completion. Participants are encouraged to anticipate scheduled increases

in rent, as described in the Stepped Subsidy activity (page 15), or other potential financial changes, such as changes in benefits due to increases in earnings, when developing their Career Plan. By anticipating and planning for these changes, participants avoid the so-called "cliff effects" that can often derail self-sufficiency progress as a household's personal income increases and public assistance declines. Upon completion of a 3-year Career Plan, the participant and RSC establish a new 3-year career plan. This process continues until the household leaves the MTW program.

Development Grants and Rent Credits

KH created the Development Grants and Rent Credit (DGRC) fund in 2014 to help offset the costs associated with attaining household goals and to provide RSR participants financial rewards for attaining them. The amount of DGRC funds available to each household is determined annually, based upon MTW funding availability. RSR participants can receive DGRC funds both as Development Grants and Rent Credits.

Development Grants help households pay the costs associated with achieving goals in their 3-year Career Plan. Examples of Development Grants include help with tuition, textbooks, exams, childcare, and even car repairs.

Rent Credits are designed to provide a financial reward to households that meet an established milestone or goal from their 3-Year Career Plan. Upon completing a goal, the household receives a credit towards the following month's rent. Rent credit amounts are based upon the difficulty of the goal and the amount of funding available. Households may receive a Rent Credit for meeting any goal, even if they utilized a Development Grant to achieve it.

Development Grants and Rent Credits are available to all RSR participants who are in compliance with the RSR program and the Obligations of the Family agreement, which outlines all the responsibilities a voucher household is required to fulfill, as well as all prohibited actions.

Participant Compliance

Once a household establishes a 3-Year Career Plan, the household and RSC meet quarterly to discuss the household's progress and any barriers that have arisen since the last meeting. Attending these meetings is mandatory. Participants who miss three (3) quarterly meetings are terminated from the RSR, Stepped Subsidy, and MTW HCV programs.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2005.01.CE ELDERLY AND DISABLED HOUSEHOLD ALTERNATIVE RECERTIFICATION SCHEDULE

Plan Year Approved: 2005 Year Implemented: 2005

KH uses a streamlined recertification process for elderly and disabled households receiving 100% of their income from any fixed income source that do not have net assets exceeding $50,000. Instead of the traditional recertification, KH relies on the published Cost of Living Adjustment (COLA) and Enterprise Income Verification (EIV) system to calculate each household's income.

Households receive a notification via mail of their new tenant share and subsidy without attending a recertification appointment. Included with this notice is the standard Authorization for Release of Information/Privacy Act Notice (HUD form 9886). All elderly and disabled households may request an interim at any time.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2005.02.CE STEPPED SUBSIDY RECERTIFICATION SCHEDULE

Plan Year Approved: 2005 Year Implemented: 2005

Instead of the traditional annual recertification process, participants whose subsidies are calculated under the Stepped Subsidy Rent Reform are recertified at each Step change, typically Years 3 and 4.

Once a household reaches Step 3, KH replaces the recertification process with an Enterprise Income Verification (EIV) systems check to test if the family has met the $0 HAP threshold (page 20), and for processing recertifications.

All Stepped Subsidy households also participate in the Resident Self-Reliance Program (RSR) and are required to attend quarterly meetings with their Resident Service Coordinator (RSC). Participants and RSCs review income and employment data at these meetings. This data is used to ensure program eligibility and to measure each household's progress towards their 3-Year Career Plan. If necessary, RSCs also collect new Authorization for Release of Information/ Privacy Act Notices (HUD form 9886) at this time.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2008.01.HC PROJECT-BASED VOUCHER PROGRAM

Plan Year Approved: 2008 Year Implemented: 2008

KH project-bases at least 75% plus any funding received for units project based through the AHPP activity (page 20). In addition, KH waives the required public process for project-basing units within KH owned and managed properties and those project-based through the AHPP activity. KH also uses its MTW flexibility to project base up to 100% of the units within a property.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2008.02.CE RESTRICTIONS ON SECTION 8 PORTABILITY

Plan Year Approved: 2008 Year Implemented: 2008

KH restricts the ability of participants in the RSR program to port out of the Monadnock Region unless they have a verifiable need for a reasonable accommodation, are the victim of domestic violence, or can show that, consistent with the RSR program's intent, such a move would demonstrably increase their financial stability, such as new employment or enrollment in an educational program.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2013.01.SS $0 HAP RENT BURDEN TEST

Plan Year Approved: 2013 Year Implemented: 2013

KH encourages participants to increase their income and move towards self-sufficiency. However, we understand that the fear of a sudden loss of important safety nets, such as housing subsidy, may hold participants back from pursuing opportunities to change jobs and/or increase income. Even if a household increases their income so that they no longer need housing assistance, there are many obstacles that they may face in the first few months after the household loses housing assistance. However, as an agency dedicated to helping our low – income neighbors reach permanent financial independence, we recognize that we should not continue helping households that no longer need our assistance.

The $0 HAP Rent Burden Test provides us a way to meet that delicate balance. When a Stepped Subsidy household reaches economic independence, measured as having a gross rent or eligible VPS at or below 30% of gross income, KH reduces the HAP to $0 for 6 months. If the household does not experience an unanticipated change in income within the $0 HAP period, housing assistance is terminated. This provides households a period to adjust to life without housing assistance, while also ensuring we are being responsible stewards of the tax payers' investment.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2014.01.HC AFFORDABLE HOUSING PRESERVATION PROGRAM (AHPP)

Plan Year Approved: 2014 Year Implemented: 2015

AHPP provides property owners the ability to opt-out of an expiring Project Based Rental Assistance (PBRA) contract and execute to a AHPP PBV HAP contract with KH. As vouchers sometimes provide higher payments than older PBRA contracts, entering into a AHPP PBV HAP contract can provide owners access to additional rental revenue and new potential funding opportunities for capital improvements. In addition, the AHPP program is much easier and less expensive for owners to comply with than HUD's multifamily program. This results in reduced overhead for owners, which when combined with competitive PBV rents, makes the AHPP program very attractive to owners of expiring use properties as well as investors interested in purchasing and preserving them. At opt-out, KH provides residents the option of remaining in place and converting their Enhanced Vouchers to PBVs, staying in-place with their Enhanced Vouchers, or taking their vouchers to the private market.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2014.02.CE MEDICAL DEDUCTION THRESHOLD

Plan Year Approved: 2014 Year Implemented: 2014

Using HUD's traditional medical deduction formula, elderly and disabled households may claim unreimbursed medical expenses over 3% of their annual income as a deduction when their income is being calculated for the purpose of rent determination. Prior to implementing this initiative KH found that most households did not need the deduction or were using it to offset costs not covered by Medicaid or Medicare. With the implementation of the Affordable Care Act (ACA), KH found that fewer households needed the lower medical deduction threshold for out-of-pocket medical expenses and were primarily using the deduction for optional private insurance coverage. KH decided to align its medical deduction threshold to that used by the Internal Revenue Service and increased the threshold to 7.5% for elderly and disabled households' unreimbursed medical expenses. This change created a buffer for households that

suffer unusually high out-of-pocket medical expenses while ensuring that limited housing dollars were not being used to subsidize private insurance.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2014.03.SS ASSET EXCLUSION THRESHOLD

Plan Year Approved: 2014 Year Implemented: 2014

When a household's assets total $50,000 or less, KH does not include the imputed value of the household's assets as income when determining the household's total tenant payment. This allows voucher participants the opportunity to establish and increase assets without being penalized by a corresponding rent increase. KH continues calculating the imputed value for all assets in the income calculation when a household's total assets exceed $50,000.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2014.04.SS KEENE HOUSING KIDS COLLABORATIVE

Plan Year Approved: 2014 Year Implemented: 2015

Keene Housing Kids Collaborative (KHKC) is a 501(c) (3) non-profit organization KH created in 2015 to provide educational and other services to children living in KH owned or managed properties, as well as children living in privately owned housing with assistance from an MTW Housing Choice, Non-Elderly Disabled, or Mainstream voucher. No child for whom KH provides any sort of support is excluded from participating in KHKC programming or community partnerships.

After many years of operating a small after school program with just a handful of children participating, KH, through its support for KHKC, is now fully engaged in the very difficult work of providing KH youth the educational, social and emotional tools and experiences they need to flourish in school and in the community so that, once they complete high school and move on to secondary or vocational school, they will be prepared to succeed. KHKC's task is to make sure that children growing-up in KH or KH assisted housing will not need housing assistance when they become adults.

To that end, KHKC has already forged important partnerships with various providers of educational, social, athletic, and other programming for children, with an initial focus on preschool to elementary-aged children. KHKC is engaging local academics with interest in issues of child development and generational poverty to study how KHKC's interventions with support from KH, can effect the economic outcomes of children living in KH-assisted housing. The hope is that much can be learned by exploring how, thanks to MTW, KH is combining its focus on adult self-sufficiency in the RSR program with the work KHKC is doing with the children of RSR families in particular, to effect multi-generational economic development.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2014.05.HC AFFORDABLE HOUSING PRESERVATION & MODERNIZATION PROGRAM

Program Year Approved: 2014 Year Implemented: 2014

The Affordable Housing Preservation and Modernization Program allows KH to use savings realized from MTW rent, programmatic, and administrative reforms to address KH, and KH-affiliate owned properties', growing capital needs. These funds allow KH to respond to the portfolio's needs in a rational way, with a predictable schedule, based on greatest need and economies of scale, rather than in reaction to unpredictable and uncertain grant opportunities. With planned capital expenditures for 2022 of $1.1 million, MTW is playing a critical role in preserving the lion's share of Keene's affordable units.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2015.01.CE AFFORDABLE HOUSING PRESERVATION PROGRAM RENT REFORM

Plan Year Approved: 2015 Year Implemented: 2015

The AHPP Rent Reform provides a streamlined methodology for calculating rent while providing households an opportunity to increase income and assets without immediate increases in rent. As in the traditional PBV program, subsidy is calculated based upon 30% of a household's adjusted annual income. However, the activity alters the current methodology for calculating rent and the recertification schedule with the following streamlined strategies:

- Triennial recertifications for all households.
- Interim recertifications are limited to household composition changes and cases where the total household income permanently drops by $50 per month or more, with access to Safety Net for short term financial hardship.
- The Utility Allowance in effect at the effective date of the last regular recertification is used to calculate rents at interim recertifications.
- Household assets with a total net value of $50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated.
- Utilizes the published Cost of Living Adjustment (COLA) and the Enterprise Income Verification (EIV) system to calculate household income for elderly and disabled households.

By simplifying the recertification and rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. In addition, this policy allows participant households the opportunity to increase earnings and assets without being discouraged by corresponding increases in rent. As evidenced by KH's successful Stepped Subsidy Activity, disconnecting a household's rent from increases in earnings or assets often leads to positive household outcomes.

Hardship Case Criteria

Households affected by this policy are provided two options when they experience a hardship that increases their rent burden. First, should a household experience a decrease in household income of $50 or more per month, it may request that KH, or the administering agency, perform an interim recertification to recalculate the household's share of the rent.

Second, if a household experiences a temporary, unforeseen rent burden increase to 45% or higher of adjusted income, the household may apply to the Safety Net program which provides a short-term reduction in the tenant share of the rent while the household recovers from whatever event created the need for Safety Net. KH has operated Safety Net since first joining MTW in 1999 as part of the Stepped Subsidy activity.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2015.02.CE AFFORDABLE HOUSING PRESERVATION PROGRAM ALTERNATIVE INSPECTION SCHEDULE

Plan Year Approved: 2015 Year Implemented: 2015

Properties participating in AHPP (page XX) use the following alternative schedule for Housing Quality Standards (HQS) inspections:

- All units converting to AHPP are inspected by the administering agency for HQS compliance no more than 90 days before initial conversion.
- If all units pass initial inspection, KH inspects 20% of the units biennially.
- Should any unit fail initial or biennial HQS inspection, the property is subject to an annual inspection of 100% of units until all pass HQS inspection, at which time the property returns to a 20% biennial inspection schedule.
- Properties subject to a higher inspection protocol than HQS may use that protocol in lieu of a biennial (not initial) HQS inspection.

Properties that fail an inspection based upon a higher standard protocol are subject to an annual HQS inspection of all (100%) units until all units pass HQS or a higher inspection protocol.

A household may, at any time, request a HQS inspection from the administering agency should the tenant believe that their unit does not meet HQS.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2015.03.CE EARNED INCOME DISREGARD DISCONTINUANCE

Plan Year Approved: 2015 Year Implemented: 2015

KH discontinued allowing new households to claim the Earned Income Disregard (EID) from the calculation of tenant rent. All households claiming EID as of January 1, 2015 were permitted to do so until the natural end of their EID allowance, as required by regulation.

Changes Proposed for FY2023

KH proposes no changes to this activity.

Hardship Case Criteria

All households are eligible for assistance under KH's Safety Net program. Safety Net permits households who experience unanticipated increases in rent burden due to a loss of income or increase in medical expenses to apply

for a temporary reduction of their tenant share. In addition, the population eligible for the EID are generally not in the Stepped Subsidy program and can request an interim recertification for long-term income changes at any time.

2016.01.CE PROJECT-BASED UNIT AGENCY CONDUCTED INSPECTIONS

Keene Housing's Moving to Work Agreement C D.1.f and D.7.A, gives KH the authority to inspect all KH and KH affiliate owned PBV units.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2017.02.HC PBV MOBILITY WAIT LIST

Plan Year Approved: 2017 Plan Year Implemented: 2013

Keene Housing increased the tenancy requirement for PBV households from one to two years. In addition, we established a ratio whereby every sixth tenant-based voucher issued will go to an eligible PBV household that has requested a tenant-based voucher by opting in to our Mobility wait list.

The policies ensure equitable access to housing by households waiting for assistance as well as by assisted households looking to move to the private market. This initiative meets the Housing Choice statutory objective and increases the number of units available to all low-income households by ensuring that availability of PBV units are not a barrier to those needing assistance. And it reduces wait times by ensuring that those on the wait list are assisted before those already being assisted.

For administrative purposes, all PBV households who applied for our tenant-based wait list prior to the implementation of this policy were automatically moved to the Mobility Wait List in the order of their original application. At lease-up, all PBV households are informed of their right to a tenant-based voucher after two – years of tenancy and given the choice to opt-in to our Mobility Wait List. PBV households may request to be placed on the Mobility wait list at any time.

PBV households are still eligible for transfers within the KH PBV portfolio during the two-year tenancy requirements if such a transfer is approved by the PBV owner. In addition, KH waives the PBV Mobility Wait List requirements for PBV households that meet the eligibility criteria for a tenant-based voucher under KH's Violence Against Women Act (VAWA), Reasonable Accommodation, or Government Displacement/Natural Disaster Preference policies.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2017.02.HC LOCAL PAYMENT STANDARD

KH sets its own Local Payment Standards based on actual market data, rather than HUD's FMRs, using the same Rent Comparability Study methodology used for our HUD Multifamily properties. The Local Payment Standard activity increases the mandated Payment Standard cap to 175% of FMR, waives the requirement to utilize HUD's FMRs when determining the agency's Payment Standards, and allows KH to self-approve rents exceeding its Board-approved VPS, when necessary.

KH's current VPS does not exceed 120% of the HUD established FMR nor has the agency approved any rents exceeding the board approved VPS.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2020.02.CE 2017 MAINSTREAM RENT REFORM

The proposed 2017 Mainstream (2017 MS) Rent Reform activity provides a streamlined rent calculation methodology for households with 90% or more of their income coming from fixed sources. By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Initial year of assistance verification 90% of income is from fixed income sources.
- Years two (2) and three (3) households self-certify fixed income sources have not changed.
- Years two (2) and three (3), Cost of Living Adjustment (COLA) recertifications (see 2005.01.CE Elderly and Disabled Household Alternative Recertification activity).
- Interim recertification for fixed income changes in years two (2) or three (3) to determine continued eligibility for the streamlined recertification process.
- Annual recertifications required if the 90% from fixed sources threshold isn't met until such time as household income returns to 90% from fixed sources.
- Medical deduction threshold 7.5%.

This activity's rent determination and recertification rules will only be applied to new lease-ups upon HUD approval of the Amended FY 2020 MTW Plan.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2020.02.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS RENT REFORM

The proposed Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) rent reform activity provides a streamlined methodology for calculating rent while providing households an opportunity to increase earnings and assets without being discouraged by corresponding increases in rent.

By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

- Participants pay 20% of gross income towards rent for the duration of participation in the FYI-TPV program.
- Interim recertifications are limited to household composition changes and cases where the total household income permanently drops by $50 per month or more, with access to Safety Net for short term financial hardship.
- Households total net value of $50,000 or less are disregarded.
- Earned Income Disregard (EID) is eliminated (see activity 2015.03.CE Earned Income Disregard Discontinuance).

- Utilization of the Enterprise Income Verification system annually to determine continued eligibility of FYI-TPV participants.

Pursuant to Notice PIH 2019-20 (HA), issued July 26, 2019, and authorization from the Department of Housing and Urban Development's Foster Youth to Independence Team, MTW agencies may administer the FYI-TPV Program per their MTW Agreement as long as it is not inconsistent with Appropriations Act requirements (including the Authorizing Statute (section 8(x) of the United States Housing Act of 1937)), or the requirements of the Notice PIH 2019-20.

The activity will be implemented upon HUD's approval of the Amended FY2020 MTW Plan.

Changes Proposed for FY2023

KH proposes no changes to this activity.

2020.01.SS FOSTER YOUTH TO INDEPENDENCE TENANT PROTECTION VOUCHERS DEVELOPMENT GRANTS

Learning from the success of the Development Grant and Rent Credit program (see 1999.05.SS Resident Self Reliance Program), KH will make Development Grants (DG) available to Foster Youth to Independence Tenant Protection Voucher (FYI-TPV) participants to help mitigate some of the financial barriers that may impede their self-sufficiency goals. These financial barriers may include transportation, tuition, textbooks, exams, childcare and employer required uniforms or special equipment.

KH will maintain a Development Grant application and schedule of allowable expenses to ensure that DGs are used to further participants' long-term self-sufficiency goals. DG payments are made directly to the vendor providing goods or services to the participant, rather than directly to the participant. FYI-TPV participants are not required to participate in the Resident Self-Reliance Program.

The activity will be implemented upon HUD's approval of the Amended FY2020 MTW Plan.

Changes Proposed for FY2023

KH proposes no changes to this activity.

NOT YET IMPLEMENTED ACTIVITIES

KH has implemented all MTW activities.

ACTIVITIES ON HOLD

KH has no activities on hold.

CLOSED OUT ACTIVITIES

2016.02.HC PROJECT MARCH (MONADNOCK AREA RESOURCES CURING HOMELESSNESS)

Plan Year Approved: 2016 (Amended) Year Closed: 2019

Project MARCH uses a Housing First model that provides partner agencies fixed subsidies to secure and maintain private market housing for their homeless clients. The first Project MARCH Partner is Southwestern Community Services (SCS). SCS is our region's Community Action Agency, and our largest THASP partner. KH pledged up to twenty (20) Project MARCH subsidies to SCS in 2016. This commitment expands affordable housing options in the community and provides options beyond the shelters for those who may otherwise find it difficult to secure permanent, affordable housing.

Project MARCH utilizes preferences to prioritize homeless veterans, followed by chronic homeless households, then homeless households. Every household who receives housing through Project MARCH is also offered two months of supportive services from SCS. SCS continues working with households who request additional services after the mandatory two month services period ends.

The Project MARCH partner is responsible for creating and enforcing eligibility and continued occupancy policies. Such policies must, at minimum, meet the following requirements:

- Ensure that no policies or procedures violate any federal, state, or local regulation or statute.
- Certify that no Project MARCH participant has been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- Require that at least one member of the participating household has established citizenship or eligible immigration status.
- Confirm that all units leased through Project MARCH meet Housing Quality Standards (HQS) protocols and are subject to KH's HQS quality control protocols.
- Ensure that a Project MARCH participant's rent burden will not exceed 45% of monthly income.
- Certify that no Project MARCH participant's annual income will exceed 80% of the Area Median Income (AMI) at eligibility.

Verify that the partner will not impose a time limit for participation, but will require Project MARCH participants to apply for housing assistance with KH as part f the Project MARCH eligibility process.

2006.01.CE STANDARD DEDUCTIONS

Plan Year Approved: 2006 Year Closed: 2013

In 2006, KH adopted a flat deduction for all elderly and/or disabled households. Households who believed their unreimbursed medical expenses were above the 3% medical deduction threshold could request that KH calculate their medical deduction instead of applying the standard deduction.

Since the process of verifying and calculating medical deductions can often be administratively burdensome, it was believed that using a flat deduction would provide administrative savings to offset any potential HAP loss. Delays in implementation and data collection resulted in KH being unable to determine the impact of this activity until 2012. A 2012 analysis showed that the loss in HAP funds due to households receiving medical deductions that they would not otherwise be eligible for far outweighed any administrative savings.

In 2013, KH discontinued application of the standard deduction for households with no unreimbursed medical expenses or expenses below the medical deduction threshold.

2011.01.CE HOUSING QUALITY STANDARDS BIENNIAL INSPECTION SCHEDULE

Plan Year Approved: 2011 Year Closed: 2017

KH uses a biennial schedule for units that have passed an initial or annual inspection for HQS compliance. Any property that fails an initial or biennial inspection is held to an annual inspection schedule until such time that all units pass an annual inspection.

Due to changes in 24 CFR 982.405, which now permit all public housing authorities to utilize a biennial inspection schedule, KH closed out this activity in FY2017.

2013.02.CE HOUSING QUALITY STANDARDS ALTERNATIVE INSPECTION PROTOCOL

Plan Year Approved: 2013 Year Closed: 2017

KH permits units that pass an inspection held to a stricter protocol than HQS – REAC, UPCS, State Finance Authority, etc. – to use the stricter protocol to demonstrate compliance with the property's biennial HQS inspection requirement.

Due to changes in 24 CFR 982.405, which now permits all public housing authorities to use a higher protocol to verify HQS compliance, KH closed out this activity in FY2017.

1999.02.CE HOUSING QUALITY STANDARDS LANDLORD SELF-CERTIFICATION INSPECTION PROTOCOL

Plan Year Approved: 2000 Year Closed: 2018

Property owners are permitted to self-certify HQS compliance of units that pass an initial KH HQS inspection in lieu of a KH administered biennial inspection. This self-certification is completed by the owner certifying a unit has been maintained to HQS standards or by providing evidence that a unit has passed a third party inspection with criteria that are equal to or at a higher standard than HQS, such as REAC or UPCS.

KH performs quality control inspections on a randomly selected number of owner certified units biennially. HCV participants receive information on HQS standards at lease-up and may request special inspections anytime they believe a unit violates HQS. Units that fail a biennial, quality control, or participant requested inspection return to a KH administered annual inspection schedule until the unit receives a 'Pass' status. Landlord self-certified units are held to the same schedule or standards as other units.

KH closed out this activity in FY2018 due to continued low landlord participation.

Section V. Sources and Uses of Funding

This section describes the agency's projected revenue and expenditures for MTW funds for 2023 and reflects use of MTW Block Grant Single-fund Flexibility.

ESTIMATED SOURCES AND USES OF MTW FUNDS

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS)

PLANNED APPLICATION OF MTW FUNDS

Estimated Sources of MTW Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

> **Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS).

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	$0
70600	HUD PHA Operating Grants	$6,745,000
70610	Capital Grants	$0
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$0
71100+72000	Interest Income	$1,000
71600	Gain or Loss on Sale of Capital Assets	$0
71200+71300+71310+71400+71500	Other Income	$0
70000	**Total Revenue**	**$6,746,000**

Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year **should not be** included in this section.

> **Note:** the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
	Total Operating - Administrative	$0
FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$526,000
91300+91310+92000	Management Fee Expense	$0
91810	Allocated Overhead	$0

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
92500 (92100+92200+92300+92400)	Total Tenant Services	$400,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$0
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$0
95000 (95100+95200+95300+95500)	Total Protective Services	$0
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$3,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$0
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$0
97100+97200	Total Extraordinary Maintenance	$0
97300+97350	HAP + HAP Portability-In	$5,123,000
97400	**Depreciation Expense**	**$0**
97500+97600+97700+97800	**All Other Expense**	**$0**
90000	**Total Expenses**	**$6,052,000**

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

In addition to the expenses listed above, KH expects to transfer approximately $694,000 out of the MTW fund to support our MTW activities such as 2014.05.HC Affordable Housing Preservation and Modernization Program and 2014.04.SS KH Kids Collaborative.

Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as "MTW Funding." The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

Planned Application Of MTW Funding Flexability
KH does not own any Public Housing and therefore does not combine Section 8 and Section 9 funds. KH relies solely on Section 8 funds and Administrative Fees to administer our programs.

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*	$548,000	$1,242,000
HCV Admin Fee	$	$
TOTAL:	**$548,000**	**$1,242,000**

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
PH Operating Subsidy	$	$
TOTAL:	**$548,000**	**$1,242,000**

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30th and end-of-year at December 31st. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at: https://www.hud.gov/sites/dfiles/PIH/documents/FDSLineDefinitionGuide_vJuly2020.pdf.

FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
Current Assets		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
135	**Investments-Restricted for Payment of Current Liability**	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	**Prepaid Expenses and Other Assets**	This line represents all prepaid expenses. These are not expected to be converted.
144	**Inter-program-Due From**	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	**Assets Held for Sale**	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
Current Liabilities		
310	**Total Current Liabilities**	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	**Current Portion of Long-Term Debt (Capital Projects/Bonds)**	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

FDS Line Number	FDS Line Item	Definition
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	**Investments-Restricted for Payment of Current Liability**	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	**Prepaid Expenses and Other Assets**	This line represents all prepaid expenses. These are not expected to be converted.
144	**Inter-program-Due From**	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	**Assets Held for Sale**	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
Current Liabilities		
310	**Total Current Liabilities**	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	**Current Portion of Long-Term Debt (Capital Projects/Bonds)**	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

KH expects to transfer unspent HAP funding out of the MTW fund to support our MTW activities such as 2014.05 HC Affordable Housing Preservation and Modernization Program and 2014.04SS KH Kids Collaborative.

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

** HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan.

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 provide a LAMP in the appendix?** No

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

Keene Housing does not own or manage any public housing units and is not required to implement or submit a Local Asset Management Plan.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

v. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

Rental Assistance Demonstration (RAD) Participation
Keene Housing does not participate in RAD

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

No

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

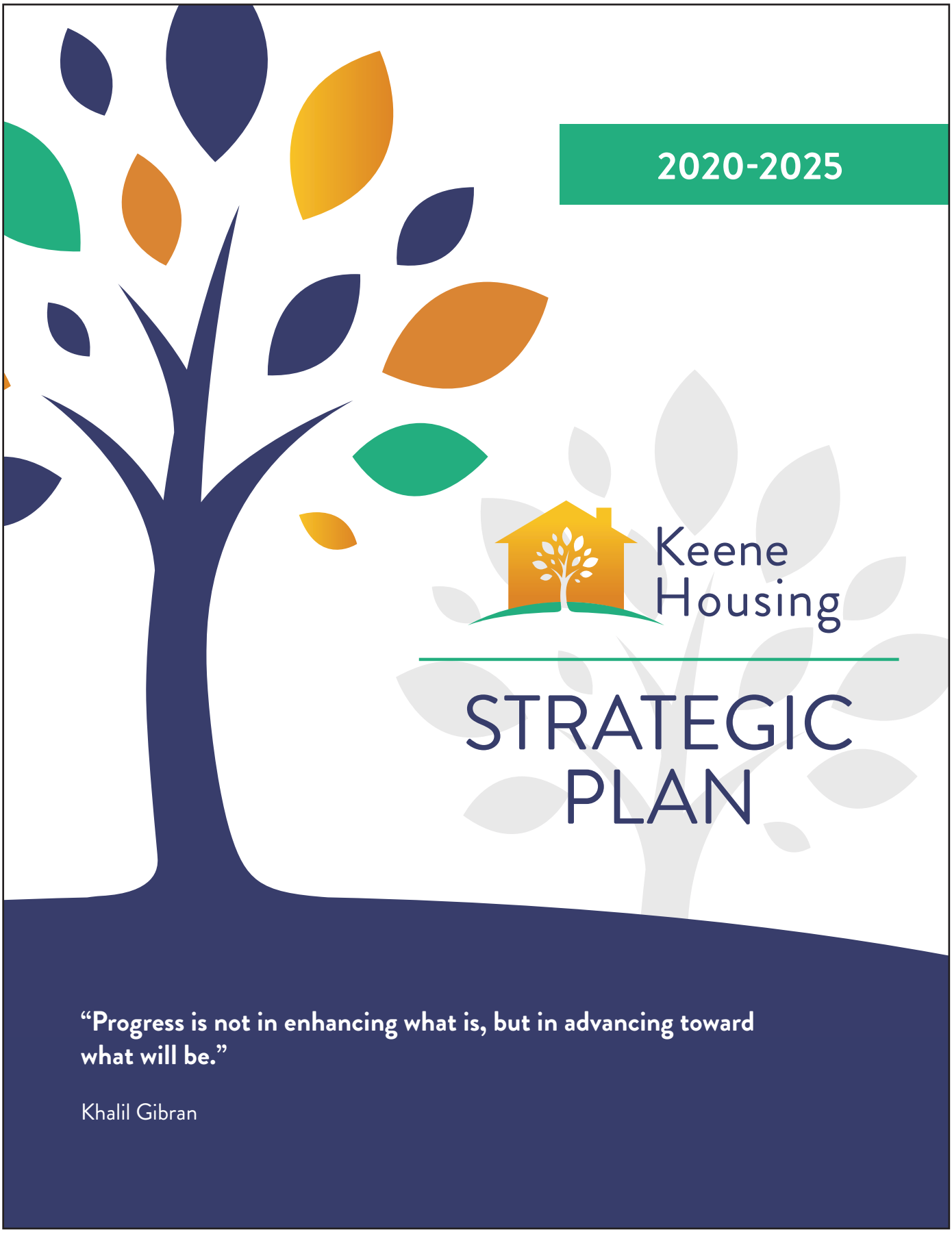
N/A

Section VI. Administrative

DOCUMENTATION OF PUBLIC PROCESS

LOBBYING DISCLOSURES

APPENDIX I. 2020 - 2025 Strategic Plan


2020-2025
Keene Housing
STRATEGIC PLAN
"Progress is not in enhancing what is, but in advancing toward what will be."
Khalil Gibran

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INTRODUCTION

This Strategic Plan provides Keene Housing's Board of Commissioners, our staff, the people we serve, and our partners – local, regional and national – with a road map that identifies the strategic goals Keene Housing will strive to achieve by 2025. This plan was developed with active engagement and feedback from our Board of Commissioners, staff, residents, voucher holders, landlords, and community partners from as nearby as City Hall and as far away as Washington, DC.

This strategic plan finds us at a very different place organizationally than we were at when the last strategic plan was developed, in 2015. In 2015 much of Keene Housing's senior staff and several Board Commissioners were relatively new to the organization, having only worked together for a few years. We were in the early stages of developing a strategy for addressing the portfolio's long-term capital needs, and we were just beginning to understand the portfolio's energy costs and opportunities for savings. Similarly, in 2015 we started to think differently about how we could better help the young people we house become successful adults, and about what more we could do to help the elderly and disabled neighbors we serve live healthier, happier, more independent lives.

By early 2019, when work on this Strategic Plan began, we were encouraged that we'd achieved many of the goals we'd set for ourselves in 2015. We'd spent the last five years aggressively addressing the portfolio's most pressing capital needs, including a massive rehabilitation project at Central Square Terrace, our 90-unit historic building in the heart of downtown Keene. Our understanding of the portfolio's energy performance and strategies for improvements had also come into focus. By 2019 we'd made significant strides towards decreasing our energy needs and had already made great progress towards reaching our goal of relying 100% on renewable energy by 2035.

Since providing it with seed funding in December 2014, the Keene Housing Kids Collaborative (KHKC) has grown from a small start-up nonprofit serving a few children, to one of the city's most recognized service organizations, serving hundreds of Keene Housing kids each year. We are also pleased that goals related to our elderly and disabled residents' quality of life were largely achieved, in great part due to the addition of a dedicated Elderly/Disabled Resident Service Coordinator in 2016. Thanks to her hard work, our elderly and disabled residents had many more opportunities to participate in activities that helped maintain their mental and physical health, social connections and sense of belonging. Similarly, our Community Garden program took off with over 35 dedicated Community Gardeners maintaining over 60 raised beds across our real estate portfolio.

Even with all of these accomplishments, there is still much work to be done, and this Strategic Plan is the guide we will use to identify and track our progress over the coming five years.

2021 Progress Report

Goal 1: Preserve, Improve and Expand Affordable Housing Stock	
• Preventive maintenance plan, with focus on reducing energy consumption	◎
• Landscape and grounds improvement and maintenance plan	◎
• Implement annual and five year Capital Plans	◎
• Update Capital Needs Assessments on a five-year cycle	◎
• Rehabilitation of Bennett Block	✓
• Recapitalization plans for Stone Arch Village and Evergreen Knoll	✓
• Rehabilitation of 105 Castle Street	◎
• Identify and undertake at least one additional development project	◎
Goal 2: Promote Energy Conservation and Sustainability	
• Implement Energy Strategic Plan in coordination with Capital Plan	◎
• Maintain and update Energy Strategic Plan	◎
• Replace Electric Thermal Storage units with high efficiency HVAC systems	◎
• Water conservation plan for community gardens	○
• Monitor utility consumption	◎
• Educate residents about energy conservation benefits	◎
Goal 3: Prudently Manage and Oversee Agency Finances	
• Annual update of the agency-wide Financial Management Plan	◎
• Opportunities for residents to contribute to curb appeals	○
• Annual review of rent and management fees	◎
• Monitor vacancy loss	◎
• Regularly renew and update cost allocation methodology	◎
• Conduct analysis of benefits and health insurance costs	◎
• Conduct analysis of property insurance costs	◎
• Identify and secure additional revenue	◎
• Revenue opportunities for community rooms	○
Goal 4: Achieve Excellence in Management	
• Achieve annual voucher program utilization goals	◎
• Achieve annual property management and maintenance goals	◎
• Annual update of TSOP and MTW Administrative Plan	◎
• Software platform conversion for voucher, property management and finace operations	◎
• Identify areas of risk and implement quality controls where needed	◎
• Streamline housing and voucher administrative processes and systems	◎
• Receive accreditation from the Affordable Housing Accreditation Board	✓

Completed ✓ Underway ◎ Not Started ○

Goal 5: Promote Wellness and Independence Among Seniors and Residents with Disabilities	
• Opportunities for additional resident services through recurring federal and state resources	○
• Implement strategies to ensure successful housing search and tenancy	◎
• Expand partnerships providing on-site quality of life programs and services	◎
Goal 6: Support Resident Economic Development	
• Develop, implement and evaluate Rent Reform RCT Study	◎
• Look for additional THASP partners and other sponsor-based subsidy programs	◎
• Increase the use of FACs by local service providers and residents	○
Goal 7: Support Youth Development Through Collaboration with KHKC	
• Improve communications between KHKC and KH BOC	◎
• Reduce MTW contribution toward KHKC operating costs	◎
• Introduce KHKC leadership to additional affordable housing partners	◎
Goal 8: Build Board and Staff Capacity and Skills	
• Continue bonus program that recognizes extraordinary performance	◎
• Continue conducting employee satisfaction/feedback surveys	◎
• Annually update Board training materials and schedule	◎
• Increase training opportunities for Board members and to engage with KH staff	◎
• Continue developing strategies to attract and retain quality staff	◎
• Implement interdepartmental cross training initiatives	○
• Implement interdepartmental "Shadow Days"	○
Goal 9: Enhance Customer Service and Operational Efficiency	
• Develop and implement a plan to improve the website	✓
• Develop and implement a security plan	◎
• Assess and implement enhancements to KH's hardware, software and IT network	◎
• Develop and implement a Communications Plan	○
• Solicit input from residents and stakeholders on KH programs and initiatives	○
• Develop a disaster response plan to recover quickly from a natural disaster	○
• Evaluate and deploy technological tools to assist residents and applicants	◎
Goal 10: Be a Strong and Effective Advocate for Innovation in Affordable Housing and Supportive Service Programs	
• Actively participate in and support the MTW Collaborative	◎
• Actively participate in and support AHAB	◎
• Actively participate in and support the New Hampshire Housing Authority Corp.	◎
• Actively participate in and support PHADA	◎
• Actively support the advocacy efforts of Housing Action New Hampshire	◎
• Senior staff hold leadership positions with local, state and federal organizations	◎
• Continue advocating for low and moderate-income people to elected officials	◎

Completed ✓ Underway ◎ Not Started ○

A ROADMAP TO 2025

As was the case with our previous five-year strategic plan, this plan is organized by goal, with each goal broken down into a series of related objectives and projects that will help ensure that we stay grounded and focused on our way to 2025. We will also continue the practice of reviewing and when needed, revising, the Strategic Plan each year.

These annual reviews give the Board of Commissioners and staff opportunities to check on our progress towards the goals, objectives and projects articulated in this plan. These check-ins also give us opportunities to make revisions when circumstances "on the ground" change. If it is to be a useful tool, the strategic plan must be a living document; we must be able to adjust and revise it in response to emerging opportunities and threats.

As we look ahead to 2025, we are excited by what is to come. We look forward to completing the portfolio's remaining rehabilitation projects and turning our attention to creating new affordable housing for our neighbors who need it. We look forward to continuing to be leaders in the areas of energy efficiency and solar energy production. We are excited to find new ways to support the health and well-being of our frailest residents and helping our working families achieve greater economic independence. And, as always, we are grateful that, thanks to our designation as a U.S. Department of Housing and Urban Development Moving to Work (MTW) Agency, we have the flexibility to respond to emerging opportunities and threats in ways that most other Public Housing Authorities cannot. Much of what we have accomplished, and what we hope to achieve in the years ahead is largely possible because of our MTW designation.

Finally, we look forward to working with all of our partners; as we try to meet our shared challenges over the next five years. This Strategic Plan is being printed at a time when business leaders, politicians and policy makers of all political and philosophical stripes are beginning to recognize the effect the affordable housing shortage is having on our communities' social, physical and economic health. While we wish it didn't take as long as it has for the housing crisis to be recognized for what it is, we are grateful that from Keene to Concord to Washington, decision makers are starting to work on solutions. We look forward to doing our part to help.

MISSION STATEMENT

"Keene Housing provides and advocates for affordable housing and supportive services that strengthen and empower low and moderate-income households in the Monadnock region."

GOAL 1:

Preserve, Improve and Expand Affordable Housing Stock

KH's existing real estate portfolio is a critical component of the region's affordable housing stock. Maintaining and improving the portfolio for future generations is amongst KH's primary responsibilities. This goal captures a broad range of initiatives that help ensure the portfolio's long-term viability including capital improvements, landscaping and other activities to improve "curb appeal", preventive maintenance and, when appropriate, recapitalization.

We also recognize that our current portfolio will never be large enough to meet the growing demand for high quality affordable housing in the Monadnock region. Therefore, this goal also encompasses efforts to address broader regional affordable housing needs through a combination of preservation and development activities.

OBJECTIVES:

- **Address the portfolio's capital needs**
- **Restructure/recapitalize portfolio financing where needed to ensure viability and long-term affordability**
- **Identify and secure new funding to support capital needs including continuing use of MTW funds**
- **Maintain exceptional "curb appeal"**
- **Leverage Project Based Vouchers and the Transitional Housing Assistance Subsidy Program as regional affordable housing preservation and expansion tools**
- **Pursue development opportunities that respond to identified, quantifiable regional housing needs**

PRIORITY PROJECTS:

- **Update annually and implement portfolio-wide preventive maintenance plan, with a focus on activities that reduce energy consumption Underway**
- **Update annually and implement portfolio-wide landscape/grounds improvement and maintenance plan Underway**
- **Implement annual and five-year Capital Plans with a focus on priority needs such as life safety improvements, energy efficiency and accessibility projects (including those that support "aging in place"), in a manner that keeps residents informed, and minimizes disruption to their lives Underway**
- **Update Capital Needs Assessments on a five-year cycle Underway**
- **Develop and implement plan for the rehabilitation of Bennett Block Completed**
- **Develop and implement recapitalization strategy, and related capital improvements, for projects nearing the end of the Low-Income Housing Tax Credit initial compliance period including Stone Arch Village and Evergreen Knoll Completed**

GOAL 1:

Preserve, Improve and Expand Affordable Housing Stock

PRIORITY PROJECTS, CONTINUED:

- **Develop a plan for the rehabilitation of 105 Castle Street, preserving its role as a community space for Harper Acres residents** Underway
- **Identify and undertake at least one additional development project by 2025** Underway

GOAL 2:

Promote Energy Conservation and Sustainability

With the exception of personnel expenses, energy is Keene Housing's largest operating cost. Recognizing the overriding importance of reducing energy consumption and costs, KH is an active participant in the Better Buildings Challenge established by the US Departments of Energy and Housing and Urban Development. Focusing on reducing utility consumption and incorporating energy efficient, sustainable materials into capital projects is the focus of the Better Buildings Challenge and this Strategic Plan goal.

OBJECTIVES:

- **Transition to 100% renewable energy sources by 2035**
- **Achieve Better Buildings Challenge goals by 2025**
- **Continue executing energy conservation and investment strategies to lower costs and reduce carbon footprint**
- **Integrate conservation and sustainability into modernization and development planning**
- **Continue accessing available energy efficiency rebate and incentive programs**
- **Stay informed about and take advantage of emerging public policies that incentivize energy efficiency and generation projects**
- **Promote KH's energy efficiency achievements to partners, stakeholders and the general public**

PRIORITY PROJECTS:

- **Implement Energy Strategic Plan in coordination with execution of Capital Plan Underway**
- **Maintain and update Energy Strategic Plan Underway**
- **Replace all Electric Thermal Storage (ETS) units with air source heat pumps or similar high efficiency HVAC system Underway**
- **Develop and implement a water conservation plan for community gardens Not started**
- **Continue monitoring utility consumption to inform choices and quantify savings from energy-related retrofits, improvements, and solar projects Underway**
- **Inform and educate residents about energy conservation benefits at lease up and periodically during tenancy Underway**

GOAL 3:

Prudently Manage and Oversee Agency Finances

Scarce federal and state support for affordable housing severely constrains Keene Housing's ability to fully address capital, supportive service and other needs. Keene Housing must work diligently to maximize the resource leveraging impact of its available funds and seek new income sources, while simultaneously reducing operating costs by pursuing creative management and energy conservation strategies. KH's objectives in this area include diversifying funding sources, increasing non-federal financial reserves and containing operating costs.

OBJECTIVES:

- **Strengthen and expand financial analysis and reporting capabilities**
- **Contain and, whenever possible, reduce operating costs**
- **Expand and diversify funding sources to reduce reliance on HUD and USDA**
- **Increase non-federal operating reserves**
- **Maximize rent and management fee potential**
- **Minimize vacancy loss across the portfolio**
- **Maximize occupancy and rent potential for commercial spaces**

PRIORITY PROJECTS:

- **Annually update and implement the agency-wide Financial Management Plan Underway**
- **Explore opportunities for residents to contribute to curb appeal Not started**
- **Conduct annual review of rent and management fees Underway**
- **Continually monitor vacancy loss Underway**
- **Regularly renew and update cost allocation methodology Underway**
- **Conduct annual review of benefits and health insurance costs, pursuing cost effective but equitable opportunities where feasible Underway**
- **Conduct annual review of property and casualty insurance costs, pursuing cost effective opportunities whenever feasible Underway**
- **Identify and secure additional revenue through grants, increased management fees, and other initiatives Underway**
- **Where permissible, repurpose and identify new revenue opportunities for underutilized community rooms in consultation with residents Not started**

GOAL 4:

Achieve Excellence in Management

Providing high quality property management and maintenance services to all residents is a core value that is deeply ingrained into Keene Housing's organizational culture. This strategic goal focuses on achieving industry-leading performance outcomes in key performance indicators including occupancy, vacancy, unit turnaround time, rent collection and work order completion. In achieving its occupancy goals, KH is committed to fair and consistent lease enforcement, and to working closely with residents to minimize the need for evictions.

OBJECTIVES:

- **Maximize utilization of available voucher and housing resources**
- **Meet or exceed performance goals related to voucher utilization, property management and maintenance indicators**
- **Document, maintain, and implement best practices that meet or exceed applicable regulatory requirements**
- **Maximize operational efficiencies created by 2019 reorganization of voucher and property management functions**

PRIORITY PROJECTS:

- **Achieve annual voucher program utilization goals Underway**
- **Achieve annual property management and maintenance goals Underway**
- **Annually update and implement Tenant Selection and Occupancy Plan and MTW Administrative Plan Underway**
- **Convert to a single enterprise software platform for voucher, property management and finance operations Underway**
- **Identify areas of risk, develop and implement quality control protocols where needed Underway**
- **Streamline and wherever possible consolidate housing and voucher administrative processes and systems to maximize efficiencies and improve operational outcomes Underway**
- **Receive accreditation from the Affordable Housing Accreditation Board Completed**

GOAL 5:

Promote Wellness and Independence Among Seniors and Residents with Disabilities

Almost half of the households Keene Housing serves includes at least one member who is elderly or disabled. State and regional demographic data suggest that this trend will continue well into the future. This strategic goal recognizes this trend, and commits Keene Housing to facilitating aging in place, and to pursuing initiatives that enhance elderly and disabled residents' quality of life. Keene Housing will accomplish this goal by partnering with agencies that have the resources and expertise to help, and by integrating residents' physical needs into our capital planning process.

OBJECTIVES:

- **Leverage resources to secure new funding and services**
- **Integrate accessibility features and resident comfort into new and retrofit project designs**

PRIORITY PROJECTS:

- **Explore opportunities for additional resident services through recurring federal and state sources including but not limited to Medicaid reimbursement** Not started
- **Implement strategies to ensure successful housing search and long-term tenancies for disabled residents and voucher holders, including educating residents on reasonable accommodations** Underway
- **Expand partnerships providing on-site quality of life programs and services** Underway

GOAL 6:

Support Resident Economic Development

As evidenced by our resident-centric approach to property management and robust resident services programming, helping residents and voucher holders seek well-paying jobs, improve their educations and increase their assets are important KH goals. This strategic goal takes full advantage of Keene Housing's MTW flexibility to develop rent reform and resident service initiatives specifically designed to help working families achieve greater economic independence.

OBJECTIVES:

- **Use MTW flexibility to explore resident service and rent models that provide incentives for employment and asset building**
- **Leverage internal and external resources to help residents and voucher holders build social connections and sense of community**
- **Focus on measurable outcomes and program evaluation**

PRIORITY PROJECTS:

- **Develop, implement and evaluate rent reform and services demonstration project, with support from third party private or academic researchers Underway**
- **Look for additional Transitional Housing Assistance Subsidy Program (THASP) partners and other sponsor-based subsidy programs (REVISED 2021) Underway**
- **Increase the use of the Family Activity Centers by local service providers and residents Not started**

GOAL 7:

Support Youth Development Through Collaboration with the Keene Housing Kids Collaborative

Keene Housing has been the driving force and primary financial supporter of the Keene Housing Kids Collaborative (KHKC), a non-profit organization established in 2014 to support the healthy development and educational success of KH youth. Working in collaboration with KH, the Keene School District and more than 30 partner agencies, KHKC is implementing an ambitious array of after school and summer programs that promote healthy youth development and support parents and children living in Keene Housing owned or assisted homes. During the Strategic Plan term, KH will support and collaborate with KHKC to increase its fund-raising capacity, and to help KHKC become a self-sustaining non-profit organization.

OBJECTIVES:

- **Continue supporting and collaborating with KHKC to expand and strengthen programs that focus on youth development from preschool through high school**
- **Help KHKC become a self-sustaining organization**

PRIORITY PROJECTS:

- **Improve communications between KHKC and KH BOC Underway**
- **Continue reducing MTW contribution towards KHKC operating costs Underway**
- **Introduce KHKC leadership to additional potential affordable housing partners Underway**

GOAL 8:

Build Board and Staff Capacity and Skills

An engaged, well-trained Board and staff are essential for Keene Housing to continue achieving excellence, fostering innovation and most importantly, addressing community needs. This goal incorporates ongoing efforts to increase the Board of Commissioner's engagement in, and advocacy on behalf of KH's strategic goals. It also encompasses supporting and building Board and staff capacity through continuing education, and initiatives that periodically solicit feedback from staff and the Board, especially when major organizational transitions are under consideration.

OBJECTIVES:

- **Recruit and retain a qualified, motivated workforce**
- **Provide staff with the training, including cross training, needed to excel at their jobs and grow within the organization**
- **Ensure that new and current Board members are fully informed of their roles and responsibilities, appropriately engaged in governance and policy matters, and fulfilling their obligation to advocate for KH and the households we serve**
- **Provide opportunities for local stakeholders, including students, to learn about KH's work**

PRIORITY PROJECTS:

- **Continue bonus program to recognize extraordinary performance Underway**
- **Continue conducting employee satisfaction/feedback surveys Underway**
- **Annually update Board training materials and schedule, including on-boarding packet, using the AHAB accreditation standards for Governance as a source for best practices Underway**
- **Increase opportunities for Board members to participate in relevant trainings and to engage with KH staff Underway**
- **Continue developing strategies that attract and retain quality staff at all organizational levels Underway**
- **Implement intradepartmental cross training initiatives Not started**
- **Implement interdepartmenental "Shadow Days" Not started**

GOAL 9:

Enhance Customer Service and Operational Efficiency

Keene Housing is a service organization. Applicants, residents and voucher holders are our customers. KH is always focused on ways to streamline operations and improve customer service for applicants, residents and voucher holders. This strategic goal incorporates activities that leverage emerging technology, provide increasingly helpful and timely information to our customers and community, and minimize disruption to residents and operations in the event of a natural disaster or other unforeseen event.

OBJECTIVES:

- **Integrate new technologies that streamline work processing and improves public/ resident access to information**
- **Ensure that the providing high quality customer service, based in empathy and fairness, is a fundamental organizational principal**
- **Provide additional opportunities to easily receive and respond to public feedback**
- **Implement a disaster response and recovery plan**

PRIORITY PROJECTS:

- **Develop and implement a plan to improve the website** Completed
- **Develop and implement a security plan** Underway
- **Periodically assess and implement required enhancements to KH's hardware, software and telecommunications network** Underway
- **Develop and implement a Communications Plan that uses technology to improve the timeliness, accuracy and accessibility of information about KH plans and strategies for applicants, residents, voucher holders, community stakeholders and other target audiences** Not started
- **Regularly solicit input from residents and stakeholders on KH programs and initiatives** Not started
- **Develop a disaster response plan that accounts for the safety of residents and staff as well as the need to recover quickly from a natural disaster** Not started
- **Evaluate and, where cost effective, deploy technological tools such as video updates, kiosks, computers and publicly available printers to assist residents and applicants** Underway

GOAL 10:

Be a Strong and Effective Advocate for Innovation in Affordable Housing and Supportive Service Programs

Keene Housing's organizational culture values and actively supports innovation and excellence in the administration of housing and supportive service programs for low- and moderate-income people. KH strongly believes that we achieve excellence by learning from, and sharing with others engaged in activities that benefit our customers. To that end, KH strives to play a prominent role in local, state and federal efforts to improve, promote and expand affordable housing programs and supportive services. Central to this effort is KH's leadership in the Moving to Work (MTW) program.

OBJECTIVES:

- **Support and participate in the growth of the MTW Collaborative and advocate for the permanent extension of current MTW Agreements**
- **Participate in local, state and national efforts to improve public policy affecting affordable housing development, management and administration**
- **Contribute to efforts to improve local, state and national renewable energy incentive programs and related public policies**
- **Contribute to efforts to improve local, state and national supportive service programs and policies**

PRIORITY PROJECTS:

- **Actively participate in and support the MTW Collaborative Underway**
- **Actively participate in and support the Affordable Housing Accreditation Board Underway**
- **Actively participate in and support the New Hampshire Housing Authority Corporation Underway**
- **Actively participate in and support the Public Housing Authorities Directors Association Underway**
- **Actively support the advocacy efforts of Housing Action New Hampshire Underway**
- **Ensure that members of senior staff hold leadership positions with local, state and federal organizations, committees and councils Underway**
- **Continue advocating for low- and moderate-income people to local, state and federally elected officials Underway**

APPENDIX II. Safety Net

Safety Net

The Safety Net (SN) program provides temporary relief to participating households experiencing significant, unexpected increases in rent burden. Safety Net is not meant to take the place of full-time employment for participants who are able to work. Work-able participants are encouraged to find employment rather than use the Safety Net program. Safety Net is meant to be temporary assistance during times of economic hardship. Applications for Safety Net must be submitted monthly unless KH approves a longer term.

Safety Net applications are reviewed by the SN Committee which consists of Resident Service Coordinators (RSC), Tenant Assistance Specialist, Voucher Program Specialist and the Director of Programs and Services. Applicants do not have to attend a SN Committee meeting, however applicants are encouraged to attend Review Board meetings to explain their need for Safety Net.

Eligibility Guidelines

The proposed 2017 Mainstream (2017 MS) Rent Reform activity provides a streamlined rent calculation methodology for households with 90% or more of their income coming from fixed sources. By simplifying the rent calculation process, the activity reduces KH's administrative burden by lowering administrative costs and staff time. The activity alters the current methodology for calculating rent with the following streamlined strategies:

1. Applicants must complete a Safety Net application and provide supporting documentation by the 20th of the month the hardship occurs.
2. KH may consider applications after the 20th in cases of unanticipated income loss for Stepped Subsidy households.
3. Applicants must meet all three of the following criteria to be eligible for Safety
4. Net.
5. In compliance with the MTW Housing Contract
6. If the applicant lives in a PBV unit, the applicant must be in compliance with their lease and not owe money to KH.
7. If the applicant owes KH money, they must execute a Payment Agreement (PA) and not be in default of the Payment Agreement.
8. In compliance with the Resident Self-Reliance program (if applicable)
9. An Income Based (IB) participant pays more than 45% of their adjusted income towards rent and allowable utilities.
10. A Stepped Subsidy participant pays more than 45% of their gross income toward rent and allowable utilities.
11. A change in the Stepped Subsidy does not qualify a household for Safety Net.
12. For mixed households, safety net determination is based solely upon eligible household members.
13. Households within the 180-day $0 HAP period (Chapter 13) with verified unforeseen changes in household composition or decreases in income may complete a Safety Net (SN) application to request consideration to recalculate housing assistance.

Consistent with KH interim policies in Chapter 13 subsidy will be calculated based upon the household's current

circumstances.

Households participating in the Stepped Subsidy Program prior to the HAP decreasing to $0 will have their subsidy reinstated at their previous step level.

Safety Net Committee

The Safety Net Committee is comprised of KH staff.

Applications are presented by a Resident Services Coordinator (RSC) to the Safety Net Committee.

The Safety Net committee may require an applicant to complete a Career Plan as part of accepting the additional housing assistance. This Career Plan may include, but is not limited to:

- Training program participation
- Proof of an active job search
- Updated financial plan
- Proof of volunteer activities
- Additional meetings with the RSC
- Other activities deemed appropriate

Setting Safety Net Tenant Payment

The Safety Net Committee has several options to help eligible households depending on the household's individual circumstances. The Committee can choose any combination of the following:

Set the household's tenant payment temporarily to the greater of:

- Minimum rent
- 30% of gross income (for Stepped Subsidy)
- 30% of adjusted income (for Income Based Subsidy)
- Extend the period of Safety Net for which the household was previously approved.
- Transfer a household from Stepped Subsidy to Income Based subsidy, if applicable.
- Recommend an Income Based Subsidy household for an interim recertification.