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Keene Housing

2026

MOVING TO WORK ANNUAL PLAN

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Section I. Introduction

As the Moving to Work (MTW) demonstration enters its 30th year, Keene Housing is proud to reflect on the tremendous value the program has delivered—not only to the people we serve and New Hampshire's Monadnock Region more generally, but to communities large and small throughout the country. Since its inception, the MTW demonstration has offered a bold vision for locally driven policy innovation grounded in flexibility, accountability, and responsiveness. For the original 39 agencies, including Keene Housing, this flexibility has been transformative—allowing MTW agencies to design programs that meet local needs, invest in long-term housing solutions, and align resources across silos to more effectively serve millions of low-income families, elders and people with disabilities.

At the same time, this milestone year provides a moment to reflect on the diverging experiences within the MTW community. While 100 agencies have joined the demonstration since 2016 under the MTW Expansion statute, their experience has been shaped by a significantly more constrained set of tools. The prescriptive nature of the Operations Notice, the uneven program administration across HUD Field Offices, and most significantly the overly restrictive funding formula faced by expansion agencies stand in stark contrast to the broad flexibilities that defines the original MTW program. This divide has created inequities within the demonstration and has undermined the potential of expansion agencies to fully innovate on behalf of the households and communities they serve.

While we remain troubled by the disparate treatment of MTW agencies between the original and expansion cohorts, we applaud HUD for several important steps taken in 2025 to strengthen the program and improve the Department's MTW oversight. The decision to return oversight of MTW from the Field Offices to HUD Headquarters represents a meaningful shift in restoring coherence, consistency, and policy leadership to the program. Likewise, HUD's improvements to the 50900 form for the original 39 agencies have made it a far more workable and informative planning and reporting tool—one that better reflects the realities of local policy implementation and relieves the original MTW agencies from collecting data that provided little to no insight into MTW activities' efficacy.

Nonetheless, there remains significant work to be done. We continue to urge HUD and Congress to extend the same flexibilities and funding structure enjoyed by the original MTW agencies to those participating under the expansion framework. Doing so would uphold the demonstration's foundational commitment to local innovation, federal accountability and ensure that all MTW agencies can fully realize the program's potential.

We also recognize that MTW agency reserve levels remain an area of concern and scrutiny. At the same time, it is important to acknowledge that the few MTW agencies that did have significant reserves made substantial progress in responsibly spending down those reserves over the past year, particularly in support of housing development and preservation. We acknowledge that anticipated further federal disinvestment from HUD programs requires HUD to look carefully at redeploying unspent funds to keep programs from shrinking, but we urge HUD to carefully consider the impact recaptures will have on MTW agencies' real estate development and preservation efforts. HUD regulation often puts PHAs at a competitive disadvantage when competing for land or real estate to acquire and develop. MTW agencies' ability to leverage our funding flexibility does much to offset that disadvantage. Uncertainty that MTW funds may not be available to us when we need them to close real estate transactions erodes our leverage immeasurably, undermining our credibility in the market, and ultimately impacting our ability to build housing for the households on our waiting lists who, because of their incomes, are unable to afford most of the housing being built today, including Low Income Housing Tax Credit (LIHTC) units.

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As always, Keene Housing's work under the MTW demonstration remains focused on the three statutory objectives that Congress established when the program was created thirty years ago: to reduce costs and achieve greater cost-effectiveness in Federal expenditures; to give incentives to families to obtain employment and become economically self-sufficient; and to increase housing choices for low-income families. Every activity outlined in this Plan builds upon those objectives and reflects our continued commitment to innovation, transparency, and local accountability in the delivery of housing assistance.

KH'S LONG TERM VISION

Strategic Plan for the coming five years will be approved by our Board of Commissioners at their December 2025 meeting and added to Appendix I of this Annual Plan at that time.

KH'S SHORT-TERM GOALS

Keene Housing enters 2026 with strong momentum as we continue to expand affordable housing opportunities across the Monadnock Region. We anticipate leasing Roosevelt School East this summer, bringing a creative adaptive reuse redevelopment project to fruition and adding much-needed units to Keene's housing supply. Simultaneously, construction will be underway on Roosevelt School West, the companion project that will complete our vision for the site and further strengthen the community fabric of the surrounding neighborhood. These two projects reflect our continued focus on neighborhood revitalization, adaptive reuse, and providing housing in walkable, service-rich locations. These Restore Rebuild projects would've been impossible to undertake absent our ability to commit MTW funds to them.

Beyond Keene, we are planning to purchase land in nearby Jaffrey, New Hampshire for future development as our next Restore Rebuild LIHTC project. As rents rise and supply remains constrained throughout Cheshire County, expanding our development footprint into nearby towns is increasingly necessary to meet the overwhelming need for more affordable housing, as evidenced by our ever-growing waiting lists. The flexibility granted under our original MTW Agreement allows us to think ahead, act decisively, and take on new challenges in ways that would not be possible were we not an MTW agency.

Despite recent policy setbacks at both the state and federal levels, Keene Housing remains committed to reducing energy costs and achieving long-term sustainability across our portfolio. We installed five new rooftop solar arrays in 2025, which bring us nearly halfway to our goal of achieving carbon neutrality by 2035. This progress reflects our belief that renewable energy production—especially solar—offers the most cost-effective path forward, even as broader investment and policy environments fluctuate.

While most federal funding for energy efficiency and renewable generation in multifamily housing has been frozen or reallocated, we are encouraged that New Hampshire's Solar for All program is advancing with dedicated funding set-aside for public housing authorities. In 2026, Keene Housing intends to pursue *Solar for All* funding for our next major solar installation, with a goal of incorporating battery storage to improve resiliency and reduce peak load costs.

Consistent with past years, our short-term goals are focused on contributing to regional efforts to address the housing crisis through acquisition and development, and to reducing our operating costs through energy efficiency and renewable energy production strategies. We are looking forward to a challenging but excited 2026!

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Section II. General Operating Information

HOUSING STOCK INFORMATION

Planned New Public Housing Units

Prior to occupancy, the two developments listed in the table below will be converted from public housing to Project Based Voucher (PBV) assistance pursuant to the Rental Assistance Demonstration's (RAD) "Restore-Rebuild" provisions.

Asset Management Project (AMP) Fill In Name And Number	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	Total Pop. Type General Occupancy	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
Roosevelt East ***	22	8	0	0	0	0	General	9	4
Roosevelt West ***	22	8	0	0	0	0	General	3	4
Housing Units to be Added in the Plan Year: 30 ****									

** 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*

**** No AMP numbers at this time*

***** Roosevelt East will be leased in 2026. Roosevelt West construction is anticipated to start in late fall 2025.*

If "Population Type" is "Other" please describe:
KH does anticipate adding any new public housing units in 2025.

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
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).

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Property Name	Number Of Vouchers To Be Project-based	RAD?	Description Of Project
Roosevelt East	30	Yes	30 units currently under construction and projected for occupancy in FY 2026.
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
Hampshire House	18	Leased	No	18 single room occupancy units
Keene Affordable Housing Properties	212	Leased	No	212 former public housing units with a HAPC for 212 units
Meadow Road	18	Leased	No	18 two and three bedroom units with HAPC for 18 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
Total: Planned Existing Project-Based Vouchers	**418**			

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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

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
If funded in 2025, KH plans to begin construction on the second of a two-phase affordable housing development close to downtown Keene. The project, Roosevelt School West, will be KH's second using HUD's Restore-Rebuild to RAD program.

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	7428	619
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	1500	125
Local, Non-Traditional: Homeownership^	60	5
Planned Total Households Served:	**8988**	**749**

* "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	1500	125
Homeownership	MTW Homeownership Flat Subsidy 2005.03. HC	60	5

* 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.

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Housing Program	Description Of Anticipated Leasing Issues And Possible Solutions
MTW Public Housing	KH has no units of public housing
MTW Housing Choice Voucher	Lack of available, affordable units in Cheshire County is the major deterrent to successful leasing. KH will launch a Security Deposit assistance program in 2026 to help prospective households compete in the market, but the lack of available stock will continue to be the greatest barrier for households securing housing.
Local, Non-Traditional	The Southwestern Community Services and Hundred Nights shelters continue operating at full capacity throughout the year.

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 shoulddetail 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	776	Open	N/A
MTW Housing Choice Voucher	Community-based	2579	Open	N/A
PBV Mobility	Site-based	158	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 plans on adding Roosevelt School East to its site based waiting list.
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.

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Section III. Proposed MTW Activities

Keene Housing is not proposing any new activities in 2026.

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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

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 FY2026

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 FY2026

KH proposes no changes to this activity.

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2023.01.HC HOMES FOR SCHOOL

Plan Year Approved: 2023 Year Implemented: 2023

The 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 began as a pilot in two Keene elementary schools, Franklin and Symonds Schools, and later expanded to the Mount Caesar Elementary School in the Monadnock School District. Homes for School provides 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.

Changes Proposed for FY2026

KH proposes no changes to this activity.

2022.01.SS DIGITAL BRIDGE PROGRAM

Plan Year Approved: 2022 Year Implemented: 2022

The Broadband Utility Allowance increases housing choices and voucher holders' quality of life by helping 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, healthcare, and educational opportunities readily available to households with 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. In FY 2022 KH used its MTW flexibility to extend the subsidy to all households participating in the Resident Self Reliance program (1999.05.SS) who pay for broadband internet in their homes.

Changes Proposed for FY2026

KH proposes no changes to this activity.

2022.02.HC OWNER RECRUITMENT AND RETENTION PROGRAM

Plan Year Approved: 2022 Year Implemented: 2022

The Owner Recruitment and Retention Program increases 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 is eligible for a $500 "Re-signing Bonus". Owners not currently renting to a voucher holder receive a $1000 "Signing Bonus" for joining or rejoining the voucher program. This program began in late 2021 with non-federal funds. MTW funds are used for this activity. KH's Finance Department will track the number of re-signing bonuses paid out each year.

Changes Proposed for 2026

To further help KH assisted households compete in the region's frustratingly tight rental market KH will add a Security Deposit Assistance Fund to the Owner Recruitment and Retention Program. The key features of the Security Deposit Fund are:

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- Households participating in KH rental programs will be notified of the fund at the start of program participation, and whenever possible, in advance of any anticipated household moves.
- KH will verify that the household is not receiving security deposit assistance from another source.
- KH will provide the security deposit directly to the landlord on the household's behalf.
- The security deposit will be the lesser of one month's rent, or the Voucher Payment Standard for which the household is eligible.
- If after move-out, no damage loss is claimed, the landlord will return the security deposit to KH.
- If, after move-out, a damage loss is claimed, the landlord will provide documentation of the damage, and the actual costs incurred to make repairs. Any unspent security deposit will be returned to KH after the repairs are completed. KH will reserve the right to inspect units to verify that damage claims and related repair costs are verifiable and reasonable.

KH will be changing the Signing Bonus payment structure to help offset potential cost increases to the activity stemming from the addition of the Security Deposit Assistance Fund. KH will reduce the Signing bonus for new landlords or those returning to the program after a lapse from $1000 to $500. Voucher program staff is confident that this change, coupled with the addition of the Security Deposit Assistance Fund will have little to no negative effect on landlord participation.

As the region's historic housing shortage grinds on, KH hopes that this change, which has served many MTW agencies elsewhere in the country well, will remove an important barrier facing KH households competing with their more affluent peers in the Monadnock Region's extremely competitive rental market.

2022.03.SS CHESHIRE COUNTY BEHAVIORAL HEALTH COURT PATHWAY HOME PROGRAM

Plan Year Approved: 2022 Year Implemented: 2022

The Pathway Behavioral Health Home program is a partnership between KH and the Cheshire County Behavioral Health Court. Behavioral Health Court is an alternative sentencing program for low level drug offenders, and individuals with serious mental health disorders. Treatment Court provides participants with a set of goals and supportive services that, in aggregate, significantly reduce the likelihood of recidivism. However, a lack of stable, affordable housing contributes to some participants' failure to complete the program. By providing Behavioral Health Court participants stable housing during their time in the program, and a clear path to a voucher upon program completion, this activity is intended to improve participants' success rates. Successful participants are those who move from potential incarceration to steady employment, stable housing, and a trajectory towards relative economic self-sufficiency.

Changes Proposed for FY2026

KH proposes changing the name of this activity to Cheshire County Behavioral Health Court Pathway Home Program to reflect the County's changing their program's name to reflect that it serves both low level drug offenders and individuals with serious mental health disorders.

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1999.01.HC ELIGIBILITY ADMINISTRATION GUIDELINES

Plan Year Approved: 2000 Year Implemented: 2000

KH calculates 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% of Area Median Income (AMI) or less, and meets the other program eligibility requirements, the household is eligible for assistance.

Changes Proposed for FY2026

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 FY2026

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

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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 FY2026

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 is a critical component of Keene's homeless and domestic violence shelter system. KH provides fixed subsidies for 7 transitional housing programs which include men's homeless shelters, a family homeless shelter, a shelter for individuals with mental health disorders, and the Monadnock Center for Violence Prevention (MCVP) shelter for individuals fleeing domestic violence and sexual assault.

Changes Proposed for FY2026

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 THRIVE program (page 18) where they receive supportive services from KH's Community Support Specialists (CSS). Households work with CSSs 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.

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# BR	VPS	Step 1 HAP	Step 2 HAP (65% of VPS)	Step 3+ HAP (45% of VPS)
SRO	$750	VPS-20% Gross Income = Subsidy	$490	$340
0	$1000	VPS-20% Gross Income = Subsidy	$650	$450
1	$1200	VPS-20% Gross Income = Subsidy	$780	$540
2	$1500	VPS-20% Gross Income = Subsidy	$980	$680
3	$1860	VPS-20% Gross Income = Subsidy	$1210	$840
4	$1985	VPS-20% Gross Income = Subsidy	$1290	$890
5	$2247	VPS-20% Gross Income = Subsidy	$1460	$1010

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.

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 THRIVE program as long as they receive housing assistance.

For Step 1 and Step 2 households pursuing educational goals in the THRIVE 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 THRIVE program. Ongoing compliance is reviewed at the household's quarterly THRIVE 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.

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Changes Proposed for FY2026

KH proposes changing the HAP calculation in Steps 1 and 2 from 65% and 45% of the Voucher Payment Standard, respectively, to the lesser of 65% and 45% of the gross contract rent or the prevailing Voucher Payment Standard.

Impact Analysis

Currently nine households are in Step 2 and 50 are in Step 3 of the Stepped Subsidy program. If implemented, the proposed change would result in two households, representing 3% of affected households, becoming eligible to apply for Safety Net consideration.

Hardship Case Criteria

All Stepped Subsidy households with rent burdens more than 45%, including those affected by the proposed change remain eligible to apply for Safety Net.

1999.05.SS THRIVE PROGRAM

Plan Year Approved: 2000 Year Implemented: 2000

Participants in the Stepped Subsidy Program are required to participate in KH's THRIVE program. THRIVE'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 Community Support Specialist (CSS) 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 CSSs are funded through HUD's Housing Choice Voucher (HCV) Family Self – Sufficiency Grant Program.

Individualized Goal Setting

New participants meet with their CSS to complete an initial Proficiencies Assessment. The assessment helps the household and CSS 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 17), 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 CSS 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 THRIVE participants financial rewards for attaining them. The amount of DGRC funds available to each household is determined annually, based upon MTW funding availability. THRIVE 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.

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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 THRIVE participants who are in compliance with the THRIVE 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 CSS 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 THRIVE, Stepped Subsidy, and MTW HCV programs.

Changes Proposed for FY2026

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 90% 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 FY2026

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 THRIVE and are required to attend quarterly meetings with their Community Support Specialist (CSS). Participants and CSSs 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.

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Changes Proposed for FY2026

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% of funding 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 FY2026

KH proposes amending the lease to clarify that owners may evict households who have been terminated from the PBV program thereby allowing owners to return the unit to the HAP contract and lease it to another eligible household.

2008.02.CE RESTRICTIONS ON SECTION 8 PORTABILITY

Plan Year Approved: 2008 Year Implemented: 2008

KH restricts the ability of participants in the THRIVE 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 THRIVE 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 FY2026

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.

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Changes Proposed for FY2026

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 FY2026

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.

Changes Proposed for FY2026

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.

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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 2026 of $2.0 million, MTW is playing a critical role in preserving the lion's share of Keene's affordable units.

Changes Proposed for FY2026

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.

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Changes Proposed for FY2026

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 FY2026

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.

2017.02.HC PBV MOBILITY WAIT LIST

Plan Year Approved: 2017 Plan Year Implemented: 2017

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.

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Changes Proposed for FY2026

KH proposes no changes to this activity.

2017.02.HC LOCAL PAYMENT STANDARD

Plan Year Approved: 2017 Plan Year Implemented: 2017

KH sets its own Local Payment Standards based on actual market data, rather than exclusively on 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.

Changes Proposed for FY2026

KH proposes no changes to this activity.

2020.02.CE MAINSTREAM PROGRAM RENT REFORM

Plan Year Approved: 2020 Plan Year Implemented: 2020

The Mainstream Program 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 methodology for calculating rent with the following streamlined strategies:

- Initial year of assistance verification 90% of income is from fixed income sources.
- 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.
- 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.
- Medical deduction threshold 7.5%.
- Assets of $50,000 or less excluded from asset imputation calculation.
- Program eligibility up to 80% of Area Median Income.
- No Housing Assistance Payment (HAP) Contracts
- No Utility Allowance reimbursements
- $125 minimum rent
- 120 day tolling time
- All Mainstream applicants receive a residency preference

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Changes Proposed for FY2026

KH proposes no changes to this activity.

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

Plan Year Approved: 2020 Plan Year Implemented: 2020

The 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.

Changes Proposed for FY2026

KH proposes no changes to this activity.

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

Plan Year Approved: 2020 Plan Year Implemented: 2020

Learning from the success of the Development Grant and Rent Credit program (see 1999.05.SS Resident Self Reliance Program), KH makes 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 economic development goals. These financial barriers may include transportation, tuition, textbooks, exams, childcare and employer required uniforms or special equipment.

KH maintains a Development Grant application and schedule of allowable expenses to ensure that DGs are used to further participants' long-term economic 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 THRIVE Program.

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Changes Proposed for FY2026

KH proposes no changes to this activity.

NOT YET IMPLEMENTED ACTIVITIES

KH has implemented all MTW activities.

ACTIVITIES ON HOLD

2015.02.CE AFFORDABLE HOUSING PRESERVATION PROGRAM ALTERNATIVE INSPECTION SCHEDULE

Plan Year Approved: 2015 Year Implemented: 2015

Properties participating in AHPP (2014.05.HC) 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 FY2026

KH plans to close out this activity in 2027.

CLOSED OUT ACTIVITIES

1999.07.HC REASONABLE RENT DETERMINATION DISCONTINUANCE

Plan Year Approved: 2000 Year Closed: 2025

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. AffordableHousing.com

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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.

1999.03.CE RENT REASONABLENESS NEIGHBORHOOD ANALYSIS DISCONTINUANCE

Plan Year Approved: 2000 Year Closed: 2025

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 15). 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.

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.

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- 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.

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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.

2016.01.CE PROJECT-BASED UNIT AGENCY CONDUCTED INSPECTIONS

Plan Year Approved: 2016 Year Closed: 2023

Section 8(o)(11) of the 1937 Housing Act and 24 CFR 983.103(f)(1) requires PHAs to contract with a third party inspector for PHA owned PBV units. However, repeated attempts to locate a third party inspector for our owned and managed PBV units have been unsuccessful. The Project Based Unit Agency Conducted Inspections activity permited KH to waive the third party inspection requirement until such time that an independent inspector was found. In lieu of a third party inspector, KH's Director of Facilities and Assets certified all KH owned and managed PBV units to Uniform Physical Condition (UPC) Standards at turnover. In addition, a KH inspector certified that units met Housing Quality Standards (HQS) as specified in KH's MTW HQS activities: 2011.01.CE Housing Quality Standards (HQS) Biennial Inspection Schedule and 2013.01.CE Housing Quality Standards (HQS) Alternative Inspection Protocol. In addition, supervisory personnel who were not involved in routine inspections monitored the quality of KH's inspections, by re-inspecting five (5%) percent of all initial and annual inspections performed each quarter as a Quality Control (QC) mechanism. The activity only affected KH's former public housing portfolio as all other KH owned PBV units are inspected at a higher standard by an outside regulatory agency. HUDs approval of KHs FY2019 MTW Plan, HUD acknowledged that 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 rendering the activity unnecessary.

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Section V. Sources and Uses of Funding

This section describes the agency's projected revenue and expenditures for MTW funds for 2026 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	$8,815,000
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**	**$8,816,000**

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	$560,000
91300+91310+92000	Management Fee Expense	$0
91810	Allocated Overhead	$0

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FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
92500 (92100+92200+92300+92400)	Total Tenant Services	$601,000
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	$5,000
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	$5,650,000
97400	**Depreciation Expense**	**$0**
97500+97600+97700+97800	**All Other Expense**	**$0**
90000	**Total Expenses**	**$6,816,000**

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

In addition to the expenses listed above, KH expects to transfer approximately $2,000,000 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 and resident services.

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 Flexibility
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*	0	0
HCV Admin Fee	0	0
PH Operating Subsidy	0	0
TOTAL:	**0**	**0**

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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.

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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, projects, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specifice 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	**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 and resident services.

* 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.

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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
If funded in 2025, KH plans to begin construction on the second of a two-phased affordable housing development at the site of the Roosevelt School near downtown Keene. The project's second phase, Roosevelt School West, will consist of thirty (30) units with six (6) units set aside for unhoused families who will receive housing stabilization and supportive services. As with the first phase, Roosevelt School East, KH intends to use HUD's Faircloth to RAD program to help support the project.

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 RAD Significant Amendments are proposed for the FY2026 Plan. As part of the FY2025 MTW Annual Plan KH submitted and HUD approved RAD Significant Amendments for the Roosevelt East and Roosevelt West development projects.

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?**

Not applicable

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Section VI. Administrative

Board Resolution and Certifications of Compliance

MTW CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (01/01/2026), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

(1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.

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

(4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities, and other applicable Federal, State, and local civil rights laws.

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

(6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at24 C.F.R. Part 146.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

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

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

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

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

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

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

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

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

(18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.

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

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.

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

Keene Housing	NH 010
MTW PHA NAME	***MTW PHA NUMBER/HA CODE***

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

Christopher Coates	Board Chairperson
NAME OF AUTHORIZED OFFICIAL	***TITLE***
SIGNATURE	09/18/2025 ***DATE***

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

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Keene Housing

831 Court Street, Keene, NH 03431
Phone & TTD – 603.352.6161
FAX – 603.352.6845

Public Notice

Keene Housing (KH) invites the community-at-large to review and provide comments on Keene Housing's DRAFT Moving to Work (MTW) Annual Plan for Fiscal Year 2026. The public comment period is open from 8:30 am on Friday, August 1, 2025, until 4:30 pm on Tuesday, September 2, 2025.

A Public Hearing is being held on:

Date: August 18th
Time: 5:30 pm
Location: Keene Housing Central Office, 831 Court St., Keene, NH 03431

The DRAFT 2026 MTW Plan is available for review on our website at www.keenehousing.org or can be emailed to or printed for interested members of the public by contacting info@keenehousing.org or by calling (603) 352-6161. KH welcomes written comments received during the public comment period by 4:30 pm on Tuesday, September 2, 2025.

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Take down 9/2/24

If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the Keene Housing main office.

EQUAL HOUSING OPPORTUNITY

PLANNED AND ONGOING EVALUATIONS

Keene Housing has not engaged any outside evaluators to review our program as a whole. The agency does engage outside evaluators on an as-needed basis.

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LOBBYING DISCLOSURES

OMB Approval No. 2577-0157 (Exp. 1/31/2027)

Certification of Payments to Influence Federal Transactions

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

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

Applicant Name

Keene Housing

Program/Activity Receiving Federal Grant Funding

Moving to Work Housing Choice Voucher Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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

Name of Authorized Official	Title
Joshua Meehan	Executive Director
Signature	**Date (mm/dd/yyyy)**
	9/18/2025

Previous edition is obsolete

form HUD 50071 (01/14)

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APPENDIX I. Strategic Plan 2030

The Strategic Plan for 2025-2030 will be approved by Keene Housing's Board of Commissioners at their December 2025 meeting.

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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 Community Support Specialists (CSSs), Tenant Assistance Specialist and the Director of Voucher Programs. 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

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 Net.
4. In compliance with the MTW Housing Contract
5. If the applicant lives in a PBV unit, the applicant must be in compliance with their lease and not owe money to KH.
6. If the applicant owes KH money, they must execute a Payment Agreement (PA) and not be in default of the Payment Agreement.
7. In compliance with the THRIVE program (if applicable)
8. An Income Based (IB) participant pays more than 45% of their adjusted income towards rent and allowable utilities.
9. A Stepped Subsidy participant pays more than 45% of their gross income toward rent and allowable utilities.
10. A change in the Stepped Subsidy does not qualify a household for Safety Net.
11. For mixed households, safety net determination is based solely upon eligible household members.
12. 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.

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Safety Net Committee

The Safety Net Committee is comprised of KH staff.

Applications are presented by a Community Support Specialist (CSS) 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 CSS
- 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.

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