

# SAHA 2025

## Impact and Innovation Plan

SAHA developed the one-year MTW Plan as an integral component of a five-year rolling Strategic Plan. The new format was the result of a deliberate effort to more closely align the agency's various planning efforts. The annual MTW Plan is now documented as an appendix to the Agency's five-year strategic plan. Appendices A through E comprise the entirety of the 50900 requirements.

SAHA's new 5-year rolling plan will be updated in the third and fourth quarters of FY2020-2021. This will be the first update of the new plan. This update will be driven by a significant amount of new information, much of it from residents and partners.

Resident and Stakeholder Work Groups were convened for ten focus group meetings in September and October of 2020, to provide feedback on the agency's proposed outcomes. To supplement this small-group feedback, a mass survey was sent out to SAHA residents in October and November, generating over 500 responses. In January of 2021, a virtual symposium was held to stimulate discussion among external partners. One of the questions that the 25 panelists and nearly 400 attendees discussed was "Housing is a Human Right". While there was broad affirmation of the value, there was also a diverse range of implementation considerations.

Each of these engagement efforts generated significant feedback, both confirming and challenging elements of the plan. The plan update process over the coming months will systematically assess the following plan elements in light of all this new information:

1. Theory of Change
2. Guiding Statements (Vision, Mission, Impact)
3. Navigation: Outcomes, Indicators, Targets, Strategies
4. Impact: Neighborhood, Local Economy, Social
5. Performance Monitoring: Operational, Financial, Resident

Updated strategic plan elements will be documented in the new SAHA 2026 Plan in time for the new fiscal year that starts July 1, 2021.

For purposes of ensuring continued program administration under the Moving to Work demonstration, the Agency has finalized this year's FY2021-2022 MTW Plan (appendix to the strategic plan). The Annual MTW Plan describes the Agency's planned use of its Moving to Work flexibilities including MTW waiver requests and other required MTW information that will support the Agency's annual strategic implementation plan.



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Strategic Plan DRAFT Released For Public Comment: February 23, 2021

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Final MTW Plan (Appendices A and B) Approved by HUD: October 26, 2021

Proposed Amendment Released for Public Comment: November 1, 2021



# SAHA 2021-2022 MTW PLAN

SAHA 2025 Appendices A through F

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## **Section I. Introduction**

### **OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES**

*Short-term goals and objectives include those that Plan Year. Long-term goals and objectives include those that the MTW PHA plans to accomplish beyond the current Plan Year. MTW PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives. If the MTW PHA includes non- MTW components, the MTW PHA should clearly delineate which are MTW and which are non- MTW goals and objectives. MTW PHAs have the flexibility to include references to proposed and ongoing activities in this section if it assists in providing an explanation about short-term and long-term goals and objectives. However, this is not required.*

### **SAHA 2025 SUMMARY**

The 2025 Strategic Plan describes the agency's priorities for the next five years. It also describes how those priorities connect to a shared understanding of the environment in which the agency works (theory of change), the impact of the agency's work on the broader community, questions that are critical to research, and annual implementation strategies.

### **GUIDING PRINCIPLES AND STATEMENTS**

- **Vision:** Create dynamic communities where people thrive.
- **Mission:** The San Antonio Housing Authority Provides quality affordable housing that is well integrated into the fabric of neighborhoods and serves as a foundation to improve lives and advance resident independence.
- **Impact Statement:** San Antonio Area has a high quality of life where all are thriving

### **LONG-TERM OUTCOMES**

The strategic plan focuses on priority 2025 outcomes for two key populations, SAHA Clients and SAHA Staff. Six outcomes have been identified as high priorities for the years 2020-2025:

- Two Staff-focused outcomes
  - SAHA staff respect and value diversity and inclusion
  - SAHA staff thrive in career and professional work
- Four Client-focused outcomes
  - SAHA residents have a sufficient supply of affordable housing options
  - SAHA residents live in quality affordable housing
  - SAHA residents feel safe
  - SAHA residents have access to sufficient utilities
  - SAHA residents have sufficient food, water, and clothing<sup>1</sup>

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<sup>1</sup> As a result of engagement efforts and the recent winter storm experienced across Texas, the Agency anticipates adding one additional client-focused outcome to the SAHA2026 five-year plan.



## Section II. General Housing Authority Operating Information

### A. Housing Stock Information

At the beginning of FY2021, the agency had a total of 6,056 units in inventory and is expected to close the FY2021 fiscal year with 6,036 units. The Agency plans to add 15 new units during the FY2022 Plan Year -- bringing the projected inventory as of June 30, 2022 to 6,051. Below is the list of changes.

#### Public Housing Stock Changes at a Glance

Period	Count	Change Description
<b>Actual:</b> June 30, 2020	6,058	
<b>Projected:</b> June 30, 2021	6,036 (-22)	The agency removed 16 units during the first part of FY2021 and anticipates removing 6 by the end of the current fiscal year
<b>Projected:</b> June 30, 2022	6051 (+15)	The agency plans to add 40 PH units at a new development. In addition, the Agency plans to remove 25 units. See below for more details.

The Agency is also looking into the possibility of bringing online additional ACC units (PH) that are authorized and have not been assigned. It is the Agency's understanding that if and when these ACC units are assigned to a property owned or being developed by SAHA, the Agency's PH unit inventory would increase.

### i. Planned New Public Housing Units

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

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Legacy at Alazan TX006000061	3	27	10	NA	NA	NA	40	General	3	NA

<b>Total Public Housing Units to be Added in the Plan Year</b>	<b>40</b>
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\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

**If "Population Type" is "Other" please describe: NA**



## ii. 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
Springview TX006000031 Building B, C,	<b>25</b> 18 (Bldg B) 7 (Bldg C)	Building B/C: Planned new development

<b>Total Public Housing Units to be Removed in the Plan Year</b>	<b>25</b>
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## iii. Planned New Project Based Vouchers (PBV)

SAHA plans to project-base forty-four (44) new housing choice vouchers in FY2021. If additional opportunities to project base housing choice vouchers at additional properties arise during FY2020, SAHA will report on any actions taken in a subsequent MTW Report.

### Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
100 Labor (Name TBD)	44	No	100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately \$54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.

<b>Planned Total Vouchers to be Newly Project-Based</b>	<b>44</b>
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## iv. Planned 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. 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
Gardens at San Juan	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	Leased / Issued	No	Final phase of Choice Neighborhood



Woodhill	35	Leased / Issued	No	Beacon Community - 10 support Next Step Housing Program (FY21-1 Activity) & 25 support VASH PBVs (Note: VASH PBVs are not funded through MTW and are only subject to specific MTW policies per HUD approval)
Rosemont at Highland Park	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)
St. John's Square	50	Leased / Issued	No	New downtown development - supports Time-limited Workforce Pilot Program (FY20-4 Activity)

<b>Planned Total Existing Project-Based Vouchers</b>	<b>180</b>
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\* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

#### v. 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.*

<b>PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR</b>
Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. It is anticipated that the property will begin re-occupancy in June 2021 and be fully occupied by October of the Plan Year FY2022.

#### vi. 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.*

<b>GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR</b>		
The San Antonio Housing Authority's capital expenditures during the plan year will be dedicated to capital improvement projects, A/E related costs, construction management fees, and operating-administration costs throughout the public housing portfolio. The capital plans will address Life-Safety repairs, comprehensive modernization and substantial renovations at several public housing developments. Other capital projects may be added based upon capital planning efforts in addition to the results of the physical needs assessment study which should be completed in 2021.		
<b>Planned Capital Improvements</b>		
Property	Budget	Description
Alazan	\$ 130,000	Fire Damage Unit
Blanco	\$ 228,227	Chiller Replacement and Upgrades
Madonna	\$ 2,000,000	Boiler and Gas Line Replacement
Parkview	\$ 580,602	Elevator Doors/Structural Exterior Repairs
Pin Oak I	\$ 24,680	Elevator Repairs
San Pedro Arms	\$ 31,005	Elevator Repairs
Villa Tranchese	\$ 152,065	Asbestos Consultant Services
Victoria Plaza	\$ 69,925	Fire Communication/Dept. Connection



Cassiano	\$ 200,000	Foundation Repairs
Cross Creek	\$ 114,000	Parking Lot Repairs
Highview	\$ 161,200	Storm Drainage Repairs
Mirasol Homes	\$ 1,209,800	Roof Repairs - Replacement
South San Apts.	\$ 161,200	Drainage Repairs
T.L. Shaley	\$ 280,000	Foundation Repair
Villa Veramendi	\$ 950,000	Roof Repairs and Replacement
Villa Veramendi	\$ 122,609	Safety & Security Cameras and Lighting
Riverside	\$ 127,391	Safety & Security Cameras and Lighting
L.C. Rutledge	\$ 653,060	Roof Repairs and Replacement
(1) Partial expenditures may carry over from FY19 to FY21.		

## B. Leasing Information

### i. Planned Number of Households Served

As detailed in the table below, SAHA plans to serve **18,382 MTW households** in fiscal year 2020-21, through both public housing, MTW Housing Choice Vouchers, and other families served as part of activity FY2011-1e. SAHA's HCV MTW baseline is 12,240 vouchers and 146,880 unit months (12,240 multiplied by 12 months). SAHA's PH program has 6,052 projected units and 72,624 unit months available for leasing. SAHA's PH occupancy goal is 98%; therefore, the Agency plans to serve 5,931 households (6052 multiplied by 98%) or 71,172 unit months leased.

#### 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	71,172	5,931
MTW Housing Choice Vouchers (HCV) Utilized	146,880	12,240
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	2,532	211
Local, Non-Traditional: Homeownership^	N/A	N/A

<b>Planned Total Households Served</b>	<b>18,382</b>
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\* "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 HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	N/A	N/A
Property-Based	FY2011-1e: Preservation & Expansion	2,532	211
Homeownership	N/A	N/A	N/A

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	The Agency is currently undergoing waitlist maintenance and evaluating the eligibility process. As a result, new processes may be implemented to improve success rates.
MTW Housing Choice Voucher	The Agency continues to select applicants from the waitlist to ensure MTW baseline is met. In addition, the Agency implemented a pre-eligibility process to increase the voucher utilization success rate.
Local, Non-Traditional	None.

## C. Waiting List Information

### i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Section 8 Tenant Voucher	Voucher	5,622	Closed	Yes
La Posada Mod Rehab	Site-Based	23,918	Open	n/a
Prospect Hill Mod Rehab	Site-Based	1,517	Open	n/a
Serrento Mod Rehab	Site-Based	17,736	Open	n/a
Public Housing	Site-Based	39,450	Open	n/a
East Meadows Project Based Vouchers	Project Based Voucher Site Based	17,180	Open	n/a
Gardens at San Juan Project Based	Project Based Voucher Site-Based	38,495	Open	n/a



Vouchers				
Wheatley Park Senior Project Based Vouchers	Project Based Voucher Site-Based	393	Open	n/a
PBV Preferred Beacon	Project Based Voucher Site-Based, Referral-based	0	Open (Referrals Only)	n/a

**Please describe any duplication of applicants across waiting lists:**

Total number of unique applicants is 87,591 with each applicant averaging approx 2 waitlist applications

**ii. 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
Section 8 Tenant Voucher	The agency is planning to open HCV waitlist with a tentative date in late June 2021
La Posada Mod Rehab	None
Prospect Hill Mod Rehab	None
Serrento Mod Rehab	None
Public Housing	The Agency is planning to transition away from site-based / preferred development wait lists.
East Meadows Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Gardens at San Juan Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Wheatley Park Senior Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
PBV Preferred Beacon	The Agency is planning to transition away from site-based PBV waitlists.



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

The Agency is proposing one new MTW activity.

### **FY2022-1: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions**

The Agency is proposing to use its MTW flexibility to support current long-term strategies for ensuring SAHA residents have access to basic needs such as sufficient food, water, and clothing in addition to safe, quality, affordable housing.

**Background:** San Antonio faced an unprecedented, historic and dangerous winter storm dropping temperatures to the single digits and leaving the city in blankets of snow that continues to affect millions throughout the state, including thousands of SAHA residents. From February 19th through the present day, the agency has received an outpouring of support from the community, elected officials, businesses and the greater San Antonio community with assistance. Community leaders delivered blankets, hot meals and water to SAHA residents. In total, more than 3,000 hot meals were delivered and more than 40,000 bottles of water were distributed to SAHA elderly residents, disabled residents and families.

While this outpouring has been truly amazing, the Agency recognizes that this support is needed on an ongoing basis and SAHA and its partners must work together to meet residents' needs. As the Agency continues to take immediate actions in response to the devastating impact of the ongoing pandemic and the recent winter storm, the Agency is also prioritizing long-term outcomes as part of its rolling five-year strategic plan. The Agency is seeking to expand partnerships to develop innovative solutions that meet the needs of those we serve and who are most vulnerable to the circumstances.

#### **A. ACTIVITY DESCRIPTION**

##### *i. Describe the proposed activity.*

This activity establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from a SAHA partner or contributions distributed to a household on behalf of a SAHA partner will not be included in the households annual income for purposes of calculating rent.

Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners. Examples include: (i) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (ii) cash or other liquid assets, and (iii) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.



ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity is designed to meet the statutory objective of increasing housing choices. In addition, this activity is in alignment with the Agency's strategic outcome to pursue partnerships that result in SAHA residents having access to basic non-housing needs such as sufficient food, water, and clothing. By excluding these contributions from the annual income, SAHA clients will be able to receive additional local support and not have their housing assistance negatively impacted.

iii. Provide the anticipated schedule for implementing the proposed activity.

This activity is planned to be implemented on October 1, 2021 with one established partner.

## B. ACTIVITY METRICS INFORMATION

### HUD Standard Metrics

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmark
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number).
Number of households receiving contributions from a SAHA partner	0 households receiving services	Estimated 1,500 served monthly or 18,000 served annually for food assistance (this may include one household being served multiple months)

CE #4: Increase in Resources Leveraged		
Unit of Measurement	Baseline	Benchmark
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).
Total amount leveraged from SAHA partners for SAHA clients across cash and non-cash contributions	0 resourced leveraged	Estimated \$700,000 leveraged annually for food assistance

Data Source: This will be tracked through the Agency's Case Management Software as well as through various data sharing agreements with partners.

\*As the Agency enters in to new partnerships, the indicators will be updated accordingly

## C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.



The Agency is not expecting to incur additional costs as a result of this activity. Because the new partnerships will yield new cash and non-cash contributions for SAHA residents, the cost implication is the unrealized financial benefit of lower HAP expenses and higher PH rental revenue as a result of projected increases in household income. The Agency is committed to ensuring partner contributions do not increase household rent share. The Agency's current budgeting process does not include these projected decreases in HAP expenses and increases in PH rental revenue as a result of household increased income.

*ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.*

Not Applicable.

#### D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

*i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.*

*ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.*

<b>Explanation</b> <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i>	<b>Attachment C Authorization</b> <i>Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.</i>
NEW REQUESTED WAIVERS	
<p><b>Exclusion of “regular contributions or gifts received from organizations”:</b></p> <p>24 CFR 5.609(c)(7) states annual income includes "Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling."</p> <p>The Agency is requesting waivers in order to exclude “regular contributions or gifts received from organizations”.</p> <p>Under this activity a household’s annual income for public housing and Housing Choice Vouchers will exclude monetary and non-monetary contributions that are received directly by the household from a SAHA partner</p>	<p><b>Attachment C, Section C.11 Rent Policies and Term Limits:</b> The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rents in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations. The Agency is authorized to adopt and implement term limits for its public housing assistance. Such policies must include provisions for addressing hardship cases. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency’s Annual MTW Plan;</p>



<p>or are received by SAHA and distributed to the household on behalf of the SAHA.</p>	<p><b>Attachment C, Section D.2.b. Rent Policies and Term Limits</b> The Agency is authorized to determine contract rents and increases and to determine the content of contract rental agreements that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24 C.F.R. 982.308, 982.451 and 983 Subpart E as necessary to implement the Agency’s Annual MTW Plan;</p> <p><b>Attachment C, Section D.3.a. Eligibility of Participants:</b> The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are “very low-income” as defined in section 3(b)(2) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have been otherwise in Section I.C. of the MTW Agreement are met. This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency’s Annual MTW Plan;</p>
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## E. RENT REFORM INFORMATION

*HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).*

### i.IMPACT ANALYSIS

*The MTW PHA may provide an impact analysis for each component of the rent reform activity or a comprehensive impact analysis of the rent reform activity. To assess the impacts of the rent reform activity, the following steps are suggested:*

*(1) A description of how the proposed MTW activity will impact household rent/tenant share.*

The activity will eliminate the increase in rent for clients as a result of excluding cash and non-cash contributions from SAHA partners.



*(2) A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.*

This activity will be implemented for new admissions and current residents upon approval from HUD and the start of the FY2022. Tracking will take place in the Agency's case management software and in partnerships with SAHA partners through data sharing agreements. The Agency will also establish points of contact for SAHA and its partners to monitor unintended consequences and impacts.

*(3) A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)*

This rent reform removes the potential increase in household rent as a result of future contributions by SAHA partners.

*(4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/ terminated/ reduced/ continued/ expanded.*

The Agency will monitor the impacts of this activity through its annual evaluation process for the Agency Strategic Plan as well as other internal evaluations of this specific activity as identified.

## **ii. HARDSHIP CASE CRITERIA**

*The MTW PHA must establish a hardship policy that clearly defines the circumstances under which households may be exempted or provided temporary relief from the activity. The MTW PHA must describe how such households could access the hardship policy and the associated process.*

The Agency does not anticipate the need for a specific hardship policy as a result of this activity. SAHA will follow standard hardship policies and procedures that are designed to allow the Agency flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis.

## **iii. DESCRIPTION OF ANNUAL REEVALUATION**

*The MTW PHA must provide an overview as to how the activity will be reevaluated on an annual basis in the Annual MTW Report, mitigating negative impacts and unintended consequences.*

The Agency has established internal review processes that will encompass reviewing key HUD metrics, SAHA operational metrics, and Partner outcome metrics to assess whether the activity is achieving its intended outcome and developing mid-course corrections as needed.

## **iv. TRANSITION PERIOD**

*The MTW PHA must develop a plan and timeline for transitioning households into the activity. If a rent reform activity, the MTW PHA should show how the impact analysis informed this transition period*

The elimination of contributions from SAHA partners will be made effective as of July 1, 2021 upon HUD's approval. As SAHA enters into partnerships, tracking procedures will be set up as part of the data sharing agreement process.



## Section IV. Approved MTW Activities

Below is a list of approved MTW activities and their general implementation status.

Current Activity	Status
11-1e- Preservation and Expansion of Affordable Housing	Ongoing
11-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	Ongoing
13-2- Simplified Earned Income Disregard (S-EID) (Public Housing)	Preparing to close out
13-4- HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Ongoing
14-2- Early Engagement	On hold
14-3- Faster Implementation of Payment Standard Decreases (HCV)	Ongoing
14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)	Ongoing
15-1- MDRC / HUD Rent Study	Ongoing
15-2- Elderly Admissions Preference at Select Public Housing Sites	Ongoing
15-3- Modified Project Based Vouchers	Ongoing
17-1- Time Limited Working Referral Program	Preparing to close out
17-2- Restorative Housing Pilot Program	Preparing to close out
19-1- Local Implementation of SAFMR	Ongoing
19-2- Alternate Recertification Process (PH and HCV)	Ongoing
20-1- College & University Homeless Assistance Programs	Early Implementation
20-2- St. Phillips College Homeless Program (SPC-HP)	Not yet Implemented/ On hold
20-3- Family Self Sufficiency (FSS) Program Streamlining	Ongoing
20-4- Time Limited Workforce Housing Pilot Program (PBV)	Not yet Implemented/On hold
21-1- Next Step Housing Program (THRU Project)	Ongoing
21-2- Limiting increases in rents	Preparing for Implementation

On June 13, 2019, the Agency received HUD approval to extend specific MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of these waivers in FY2020<sup>1</sup>. Below is a list of MTW activities apply to each program.

- FY2019-1: Local SAFMR Implementation
- FY2019-2: Alternate Recertification Process

<sup>1</sup> Because these MTW regulatory waivers have been extended to the HUD-VASH program, activity-specific reporting includes households served by the HUD-VASH program and who are subject to the alternative MTW policies, HUD-VASH program participants are not considered MTW households and HUD-VASH program funding is not eligible for MTW funding fungibility. As such, other MTW reporting elements including MTW statutory requirements (ie, MTW households served) and MTW sources and uses exclude HUD-VASH program participants and funding.





- 14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)

## **A. Implemented Activities**

### **1. FY2011-1e: Preservation and Expansion of Affordable Housing**

#### **i. Plan Year Approved, Implemented, Amended**

This activity was approved and implemented in FY2010-2011 MTW Plan.

#### **ii. Description/Update**

**Update:** This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The Agency has several projects in the development pipeline that will utilize MTW funding. (see Appendix E. Asset Management Plan for additional details on the Agency's preservation and expansion plans)

**Description:** Under San Antonio Housing Authority's (SAHA's) broader uses of funds authority, Attachment D, the Agency may use MTW funding for local, non-traditional units providing that the activities meet the requirement of the MTW statute. While SAHA has had the authority to utilize this flexibility since 2011, the Agency has not utilized it for the construction of new units; all development reported under this activity in past years occurred outside the scope of MTW as it used other funding sources, including tax credits, HOME funding, CDBG and other local and state funding.

SAHA began utilizing this ability to fund local, non-traditional units in combination with a new flexibility to combine replacement housing factor (RHF) funds with the MTW block grant; the Agency executed an RHF amendment and RHF Plan that was approved by HUD in FY2014.

This activity operationalizes the expansion policies adopted in FY2011 by utilizing the local, non-traditional unit authorization under SAHA's broader uses of funds authority and securing the approval to combine RHF funds into the MTW block grant, which requires the Agency to construct new affordable units (defined as units reserved for households with income at or below 80% AMI).

While SAHA may develop new communities with market-rate units in addition to affordable units, this activity does not authorize the use of MTW funds (including RHF funds) for the development of those market-rate units.

Important to note is SAHA's flexibility to construct new Section 8 or 9 units that are authorized under MTW single-fund flexibility, and those outcomes are reported in the Sources and Uses of Funds section of this report (Section V.). The only units authorized under this activity FY2011-1e are those reserved for households with income at or below 80% AMI that receive no Section 8 or 9 funding.

This activity was revised for FY2016. Language describing Preservation and Expansion Policy context, background, and process was moved to Appendix 3. While the Preservation and Expansion Policy language can provide a helpful backdrop to the goals of FY2011-1e, it can also distract from the specific use of MTW flexibility. The language in FY2011-1e is now focused on the



use of MTW funds to preserve or expand affordable housing units without any Section 8 or Section 9 subsidy. Since no preservation of non-Section 8 or 9 units is planned for FY2016, the metric “HC #2: Units of Housing Preserved” has been set to a benchmark of 0 (zero).

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None



## **2. FY2011-9: Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services**

### **i. Plan Year Approved, Implemented, Amended**

This activity was approved in FY2010-2011 and implemented in the same fiscal year. This activity has been amended as follows:

- **FY2019-2020:**
  - Added up to forty (40) additional tenant-based vouchers to support a Permanent Supportive Housing (PSH) provider currently partnered with SAHA administering the Move On Program.
  - Adopted alternative portability policies for all set-asides under this activity to ensure participants are able to continue receiving supportive services by partners while receiving the set-aside housing assistance. Under this alternative policy, recipients would not be able to port or take their SAHA set-aside voucher to another jurisdiction.
  - Adopted a hardship policy: a set-aside voucher recipient may be given the opportunity to port out of SAHA's jurisdiction in the following cases:
    - If the recipient has an approved reasonable accommodation need; or
    - If the recipient requests an emergency transfer request under the VAWA Act of 2013.

### **ii. Description/Update**

**Update:** This activity is ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio by increasing housing choices. The new Move On Program was launched in January 2020.

**Description:** SAHA allocates up to 240 tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside vouchers support two main programs:

- **The Set Aside Homeless Voucher (SHVP) Program:** The Set Aside Homeless Voucher Program (SHVP) provides rental voucher assistance to homeless individuals through a collaborative referral process. San Antonio Metropolitan Ministries (SAMMs) and the Center for Health Care Services (CHCS) screen applicants to ensure they meet all eligibility criteria and then forward referral packets to SAHA. A total of 200 vouchers have been allocated for the Set Aside Homeless Voucher Program (SHVP) program. Case management and supportive services are provided by CHCS and SAMMs.
- **Move On Program:** The Move On Program provides 40 tenant-based vouchers for families currently residing in Permanent Supportive Housing (PSH) to transition to subsidized housing. The program is designed to serve those who previously experienced chronic homelessness, been successfully served through PSH and will benefit from on-going housing subsidy to prevent a return to homelessness. Current partner is the South Alamo Regional Alliance for the Homeless (SARAH).



**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None



### 3. FY2013-2: Simplified Earned Income Disregard (SEID)

#### i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2012-2013 and implemented in FY2013-2014. This activity has been amended as follows:

- FY2014-2015: Removed Family Self-Sufficiency (FSS) from the list of approved self-sufficiency programs due to the Agency's inability to reconcile FSS program requirements with this waiver.
- FY2015-2016: Established the requirement that families complete financial literacy classes.

#### ii. Description/Update

Update: The Agency is currently phasing out this activity during and may propose a new EID activity in a forthcoming MTW plan. Close out reporting to HUD is scheduled for FY2021 MTW Report.

Statutory Goal	Housing Programs	Additional Requirements
<ul style="list-style-type: none"><li>▪ Self-Sufficiency</li><li>▪ Cost Effectiveness</li></ul>	<ul style="list-style-type: none"><li>▪ MTW Housing Choice Voucher</li><li>▪ Public Housing</li></ul>	<ul style="list-style-type: none"><li>▪ Must complete financial literacy classes</li><li>▪ Must enroll in an approved self-sufficiency program</li><li>▪ Current approved programs:<ul style="list-style-type: none"><li>▪ Westside Jobs Plus Program</li><li>▪ Annie E. Casey/East side Jobs Plus Program</li></ul></li><li>▪ Self-sufficiency programs NOT approved:<ul style="list-style-type: none"><li>▪ Family Self-Sufficiency (FSS) Program</li><li>▪ HUD Jobs-Plus at Cassiano Homes</li></ul></li></ul>

This activity eliminated the traditional EID for all programs and established an alternative earned-income disregard (EID) for the MTW Housing Choice Voucher and Public Housing programs that requires enrollment in an approved self-sufficiency program. The alternative disregard expands the number of months for which EID (referred to as earned-income disregard or earned-income disallowance) is available from 24 months to 60 months, and makes the benefit available continuously during the 60 months, without start/stop. Head, Spouse or Co-head of Household qualifies entire household for SEID (formerly only Head of Household could participate). Income is disregarded on a sliding scale based on year(s) of participation:

- During year 1, 100% of earned income is disregarded
- Year 2: 80%
- Year 3: 60%
- Year 4: 40%
- Year 5: 20%

Participating households must attend quarterly financial counseling sessions in order to ensure that families are equipped with the tools and knowledge to budget effectively in preparation for the annual reduction of SEID, and to increase chances of success in achieving self sufficiency. At the time of the referral, staff schedules an appointment with financial counseling providers such



as Family Service Association or the Financial Empowerment Center. Participating households must attend the counseling sessions prior to the annual incremental reduction of EID, or within one month of the reduction being processed. Staff have access to the appointment log, and sign in sheets for financial counseling, and a very good relationship with counseling partners to obtain information on attendance.

Case management Staff monitor attendance, and follow up with members to ensure they are on track. Should they fail to attend, staff report back to management when a member lapses. A hardship provision allows a grace period for unforeseen circumstances.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

The Agency is preparing to close out this activity.



#### **4. FY2013-4: HQS Inspection of SAHA-owned non-profits by SAHA inspectors**

##### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation began on January 1, 2013.

##### **ii. Description/Update**

Update: This activity is ongoing. The Agency continues to experience cost efficiencies by conducting inspections of SAHA-owned nonprofits by SAHA Inspectors.

Description: This activity allows SAHA inspectors (instead of third- party contractors) to inspect and perform rent reasonableness assessments for units at properties that are either owned by SAHA under the Agency's non-profit portfolio or owned by a SAHA affiliate under the Agency's partnerships portfolio. At the time of implementation, SAHA's Inspections department was equipped to absorb the additional inspections without the need for additional full-time or part-time equivalent positions.

SAHA estimated that the impact to the Agency would be a cost savings of \$55.46 per inspection. This figure was the projected result of replacing third-party contractors with in-house inspectors. At the time this activity was adopted, the cost of contracting with a third party to conduct 2,391 inspections annually was \$182,478 per fiscal year, which translated into a cost per inspection of \$76.32. The cost per inspection using SAHA staff was estimated at \$20.86. The net savings per inspection was projected to be \$55.46.

As required by HUD, "CE #2: Staff Time Savings" has been added to this activity. While SAHA recognizes HUD's efforts to standardize metrics across MTW agencies, this metric is not in alignment with the nature of this activity. Agency cost savings in this activity is not the result of staff time savings, but instead of increased efficiency.

##### **iii. Planned Non-Significant Changes**

None

##### **iv. Planned Changes to Metrics/Data Collection**

None

##### **v. Planned Significant Changes**

None



## 5: FY2014-2: Early Engagement (EEP)

### i. Plan Year Approved, Implemented, Amended

This activity is designed to increase housing choices by providing training to support successful participation in SAHA's Federal Housing Programs, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. After a hold period of several months during FY2015, this activity resumed in FY2016. The pause in the activity was due to prioritizing lease-up over other considerations.

### ii. Description/Update

Update: Effective March 16, 2020, the Agency implemented its [Workplace Transition Plan](#), Transition Level 1, Emergency Operations. On June 22, 2020 the Agency transitioned to Level 2, Modified Operations. As a result, all EEP sessions were cancelled. The last EEP session was held in February 2020. In addition, the following actions have impacted this activity:

- Suspension of evictions for non-criminal activity
- Suspension of transfers, move-ins, and move-outs
- Suspension of all resident activities
- Suspension of terminations
- Modifications of voucher issuance for current and new clients
- Closure of Section 8 lobby and property management offices

This activity is on hold as a result of the ongoing pandemic. See Section 4.C. Activities on hold for a full description of the activity.





## **6. FY2014-3: Faster Implementation of Payment Standard Decreases (HCV)**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan.

### **ii. Description/Update**

Update: This activity is ongoing. We are implementing the appropriate payment standard at regular reexaminations and at moves, but not at interim reexaminations.

Description: Typically, when Fair Market Rent (FMR) is reduced and the payment standard is adjusted accordingly, the reduced payment standard is applied at each participant's second regular reexamination. This activity will allow SAHA to apply the lower payment standards at each participant's next reexamination (Move, Interim and/or Annual reexaminations), or as predicated on business need. If the participant's rent portion increases as a result of applying the new payment standard, SAHA will provide the participant a 30-day notice of rental increase.

### **iii. Planned Non-Significant Changes**

None

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

None



**7. FY2014-6: HCV Rent Reform** (consolidates previously approved activities into one and renames it to clarify intent)

**Previously approved**

FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule

**i. Plan Year Approved, Implemented, Amended**

Both activities are designed to work together to reduce cost and increase cost effectiveness. For FY2014-6 Rent Simplification, the Agency received HUD approval as part of the FY2013-2014 Plan and began implementation in July 2014. For FY2015-4: Simplified Utility Allowance Schedule, the Agency received HUD approved as part of the FY2014-2015 MTW Plan and began implementation in January 2015.

This activity is designed to meet the statutory objective of increasing cost effectiveness, and was originally approved as part of the FY2014-2015 MTW Plan.

Note that this activity applies only to Housing Choice Voucher (HCV) program participants who are **not** part of FY2015-1 MDRC/HUD Rent Study. If a household is selected to participate in the control or treatment group of the Rent Study, they will be subject only to FY2015-1, and not this activity FY2014-6.

**ii. Description/Update**

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has two elements: (1) simplified rent calculation (previously approved under FY2014-6: Rent Simplification) and (2) simplified utility allowance schedule (previously approved under FY2015-4: Simplified Utility Allowance Schedule)

(1) Rent Simplification Description: Previously, rent calculation was based on 30% of the participant's adjusted monthly income. This activity lowers the percentage used to calculate rent to 27.5% of monthly gross income for all MTW HCV participants and new admissions, and eliminates deductions (i.e., medical and child care) with minimal impact to the participant's rent portion. Additionally, SAHA will not disregard the participant's income using the traditional Earned Income Disallowance (EID) calculation.

The per-unit cost will be calculated by the total housing assistance payments divided by the total number of units leased each month. The housing assistance payments expense will be obtained from the monthly financial statements and the total units will be obtained from the Unit Month Report. SAHA will conduct time studies to verify the number of hours that staff spends calculating tenant rent portion. The quality control score will be obtained from an Access database..

(2) Description: Prior to this activity, the Agency conducted annual reviews and periodically re-established a Utility Allowance Schedule to represents reasonable utility cost expectations as part of a tenant's lease. The Utility Allowance Schedule is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric).



This activity establishes a new, simplified schedule that is based on the analysis of data collected from SAHA's existing HCV portfolio including the most common structure and utility types. The simplified schedule reduces administrative costs associated with the traditional method of applying a Utility Allowance Schedule. Specifically, the activity will allow the HCV department to be more cost effective by reducing staff time spent on calculating multiple utility schedules for 6 different structure types plus various utility types such as gas, electric or propane.

The simplified utility allowance schedule is also anticipated to benefit property owners, who will have a more accurate understanding of the total gross rent to be applied to their properties, and to benefit participants, who will be able to use this new schedule to clarify gross rent in their selection of housing units.

The new utility allowance schedule is implemented at the time of recertification, interim or change of unit. The schedule will be applied to the lesser of these two options:

- the actual size of the unit, or
- the size of the voucher.

The flat utility allowance will not be granted in the case of tenant-provided appliances, which are not considered tenant-supplied or -paid utilities. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

**Hardship Policy:** Households that experience a rent increase of \$26 or more due to the rent simplification calculation will be granted a hardship exemption and have the household's TTP calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each annual and interim recertification

Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each recertification.

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

### **iii. Planned Non-Significant Changes**

None

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

None



## **8. FY2015-1: MDRC / HUD Rent Study**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to promote self-sufficiency, increase cost-effectiveness, and increase housing choices. It was originally approved as part of the FY2014-2015 MTW Plan.

### **ii. Description/Update**

Update: This activity is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.

Description: San Antonio Housing Authority (SAHA) has been selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency
- Simplify the administration of the HCV Program
- Reduce housing Agency administrative burden and costs
- Improve accuracy and compliance of program administration
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under traditional rules
- Improve transparency of the program requirements

A computer-generated program will randomly select the participants for the Study from the pool of eligible vouchers. The Study Group vouchers will be managed using the proposed policies. The Control Group vouchers will be managed using the existing policies. Eligible participants in both the Study and Control Groups will include only those with vouchers that are administered under the Moving To Work (MTW) Program and not currently utilizing a biennial certification. Non-MTW Vouchers (i.e., Veterans Affairs Supportive Housing, Moderate Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and HUD Project Based Vouchers are excluded from the Study. Additionally, the Study is focused on work-able populations and will not include Elderly Households, Disabled Households and households headed by people older than 56 years of age (who will become seniors during the course of the long-term study). Households currently participating in Family Self-sufficiency and Homeownership programs will not be included in the Study. Households that contain a mix of members with an immigration status that is eligible for housing assistance and immigration status that is non-eligible for housing assistance would not be included in the Study.



## I. Description of Rent Reform Components

The Study is designed to test an alternative strategy to standard HUD operating rules for the HCV program. The proposed alternative rent policies will include the following five key features:

- 1) Simplify income determination and rent calculation of the household's Total Tenant Payment (TTP) and subsidy amount by:
  - a) Eliminating deductions and allowances,
  - b) Changing the percent of income from 30% of adjusted income to a maximum of 28% of gross income,
  - c) Ignoring income from assets when the asset value is less than \$25,000, and
  - d) Using retrospective gross income, i.e., 12-month "look-back" period and, in some cases, current/anticipated income in estimating a household's TTP and subsidy.
  - e) Capping the maximum initial rent burden at 40% of current gross monthly income.
- 2) Conduct triennial income recertifications, rather than annual recertifications, with provisions for interim recertifications and hardship remedies if income decreases.
- 3) Streamline interim certifications to eliminate income review for most household composition changes and moves to new units.
- 4) Require the TTP is the greater of 28% gross monthly income (see #1 above) or the minimum rent of \$100. A portion of the TTP will be paid directly to the landlord.
- 5) Simplify the policy for determining utility allowances.

Additionally, the Study will offer appropriate hardship protections to prevent any Study Group member from being unduly impacted as discussed in Section V below.

### A. Description of the Rent Reform Activity

#### 1) Simplified Income Determination and Rent Calculation

Under the current HUD regulations, the total tenant payment (TTP) is a calculation derived from the voucher household's 30% adjusted monthly income (gross income less HUD prescribed deductions and allowances). SAHA follows a process of interviewing the household to identify all sources of income and assets, then verifies the information and performs the final calculation. The process is complex and cumbersome, which increases the risk of errors. According to HUD's Occupancy Handbook, Chapter 5 "Determining Income and Calculating Rent," the most frequent errors found across PHAs are: Voucher holders failing to fully disclose income information, errors in identifying required income exclusions and incorrect calculations of deductions often resulting from failure to obtain third-party verification. The complexity makes the HCV program less transparent and understandable by the public, landlords and voucher holders.

#### 2) Elimination of Deductions

SAHA proposes a new method of calculation, which eliminates the calculation of deductions and allowances in the determination of annual income.

- a) Percent Annual Gross Income.



The Total Tenant Payment (TTP) rent calculation will be determined by establishing gross annual income and then determining the greater of 28% of the gross monthly income or the minimum rent of \$100.

b) Elimination of Income from Assets valued less than \$25,000

SAHA will eliminate the verification and calculation of income earned from household assets valued less than \$25,000. Households would not be required to document assets worth less than that amount. This will reduce administrative costs and simplify the program for greater transparency and program compliance.

c) Review of Retrospective Income.

To establish annual gross income for the three-year certification period, SAHA will review the total household income without deductions for the twelve-month period prior to recertification, i.e., the “Retrospective Gross Income.” A household’s annual gross income will depend on its *Retrospective Gross Income* during a 12-month “look back” period.

At the certification, if a household’s current/anticipated income is less than its retrospective gross income by more than 10%, a “temporary” TTP based on current income alone will be set for six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average retrospective gross income. No interim recertification interview would be required to reset this TTP.

d) Capping the Initial Maximum Rent Burden

HUD places a maximum rent burden for households moving into a new unit under the housing choice voucher subsidy, which is determined to be 40 percent of the household’s adjusted annual income. However, under the Rent Reform Study, the PHA will no longer adjust household income using deductions and allowances. The household must not pay more than 40 percent of gross current monthly income for the family share when the family first receives voucher assistance in a particular unit. (This maximum rent burden requirement is not applicable at reexamination if the family stays in place).

3) Triennial Certifications

SAHA currently performs re-certification of HCV households on an annual basis. The annual certification will review program eligibility, household composition, income and other household circumstances. Additional re-examinations (“interim certifications”) may be required for changes in the household situation such as: composition, income, and change in unit.

SAHA proposes performing re-certification of the Study Group every third year (triennial). The triennial certification will review program eligibility, household composition, current income and income over the past twelve months (“retrospective income”), unit information and shall set the Total Tenant Portion (TTP) and the household share of the rent. The TTP for the Study Group will remain in effect during the three year certification period, with some exceptions related to decreases in income and changes in household.



Under the alternative rent policy, a household's annual gross income will be determined using its reported (and verified) *retrospective gross income* during a 12-month "look-back" period. (In this calculation, gross income will exclude any prior income from sources that have expired for the household during that period, such as TANF or Unemployment Insurance benefits, since the household can no longer count on them. It will include imputed welfare income – i.e., any sanctioned portion of a household's TANF grant). SAHA will create a local form to supplement the HUD form 9886 to provide tenant consent for SAHA to collect information relevant to the triennial recertification period.

If the household has an increase in income between certifications, the household's TTP will not be re-determined and increased to reflect the higher income. However, if the household has a decrease in income, the household may request and SAHA may provide an interim re-certification or other remedies under the hardship process (see Section V). The interim re-certification will be conducted when a household has a reduction of income of more than 10% from the retrospective gross income.

- a) SAHA interim certification will re-calculate the household TTP based on a new retrospective gross income review to determine the greater of 28% of the retrospective gross income or the minimum rent of \$100. This retrospective gross income will establish the TTP that will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later.
- b) At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective gross income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.
- c) At the initial triennial certification only, if a household's childcare expense exceeds \$200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the \$200 per month, to create a "temporary" TTP for a six-month grace period. SAHA defines reasonable childcare costs as less than \$3,000 per year for one child and \$6,000 per year for two children. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.
- d) The Study Group will be allowed one request per year for an interim certification to reset their TTP. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. The TTP will only be reset if a household's new retrospective monthly income (at the time of the request) is more than 10% lower than its most recent prior retrospective gross monthly income. If the limit on interim certification





presents a hardship, the household will need to apply for a Hardship Exemption (See Section V below).

#### 4) **Streamline Interim Certifications**

SAHA will institute a streamlined interim certification process for the Study Group to report change of circumstance that does not require adjustment in subsidy. For these events, SAHA will not request income information. These events include:

- a) Changes to household composition. The Study Group must report both additions and removal of members to the household to SAHA to determine program eligibility and other HUD required reporting (e.g. deceased tenant reporting). However, unless the addition of an adult member changes the voucher bedroom size appropriate for the household composition to prevent overcrowding or over-housing, SAHA will not request income information for the new household member until the next scheduled triennial certification.

If the loss of a household member results in a reduction of more than 10% of the most recent retrospective gross income, the household will be allowed to reset their TTP.

In the event that the new or removed member requires a change to the voucher bedroom size, SAHA will review the retrospective gross income of the newly added or removed household members, apply a new utility allowance, and will reset the household TTP. A reduction in subsidy for new voucher bedroom size will be implemented when the current lease ends and new lease begins.

Changes to household composition will not be counted towards the limit of one requested interim certification per year.

- b) Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, SAHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. However, unless the request for move is due to a change in household composition, SAHA will not request income information or reset the household TTP until the sooner of the next scheduled triennial certification or tenant requested interim certification to reset TTP. SAHA will apply new utility allowance schedule, if any, to the household at the new lease effective date.
- c) Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:
- Change their contract rent,
  - Recertify and the TTP is recalculated during interim or triennial,
  - Move to new units, or
  - Change their household composition requiring a change in voucher size.

#### 5) **Minimum Rent to Owner**





Currently, HUD does not require minimum rents to be paid by the voucher holder to the landlord. SAHA is proposing that Study Group members will be required to make a minimum payment of at least \$100 direct to the HCV landlord in addition to SAHA's portion of rent (Housing Assistance Payment "HAP"). The total amount of rent will equal the contract rent established in the lease. This policy mirrors the market system of tenants paying owners directly and creates a closer relationship and sense of responsibility for both the leaseholder HCV household and the property owner.

The amount of rent to owner the Study Group will pay is equal to their TTP less the Utility Allowance plus any amount over the payment standard for which the tenant may be responsible to pay. The Study Group rent to owner will not be less than the minimum rent. In the event that the Study Group household TTP less the Utility Allowance is less than the minimum rent, the household will pay the Owner the minimum rent and SAHA will reimburse the household the balance of the Utility Allowance. However, if the minimum rent to owner exceeds 40% of the household current/anticipated gross income, the household may request a Hardship Exemption as detailed in Section V below.

6) **Simplified Utility Allowance Schedule.**

Currently, SAHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents the reasonable expectation of costs for utilities as part of the tenant's lease.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from SAHA's existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the triennial certification or change of unit.

SAHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying Utility Allowance Schedule. The simplified utility allowance schedule is also anticipated to benefit property owners who will have a more accurate understanding of the total gross rent to be applied to their properties and to the Study Group members who will be able to use this new schedule to clarify gross rent in their selection of housing units.

This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher rather than the larger of the actual unit size or the voucher size. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

**Proposed Flat Utility Allowance**

Bedroom Size	Flat Rate
0	\$ 75
1	\$ 94
2	\$124
3	\$174
4	\$214
5	\$277



6	\$290
7	\$333

## II. Hardship Policy

SAHA is participating in the Study in order to further the national discussion regarding the future of the Housing Choice Voucher Program. The alternative rent strategies are not intended to create an undue burden on the Study Group members. SAHA has established the following Hardship Policy for Study Group members. Households participating in the Study as part of the Control Group will be subject to the current SAHA policies.

### A. Hardship Waiver Request Process.

The process for requesting a waiver will be as follows:

- 1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to Housing Assistant Specialist.
- 2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.
- 3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 90 days.
- 4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 10 day notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 10 day notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

### B. Hardship Waiver Criteria

SAHA may determine a financial hardship exists when the household cannot pay the minimum rent or has an excessive rent burden. Households will be considered for a hardship waiver, as discussed below, if:

- 1) The hardship cannot be remedied by the one interim recertification permitted each year (which cannot reduce a household's TTP below the minimum level).
- 2) The household is at an income level or experiences a loss of income and/or a TTP increase such that its total monthly TTP exceeds 40 percent of its current monthly gross income. The gross income will include imputed income in the same manner as current calculations.
- 3) The household faces risk of eviction for non-payment of rent – including utility shut-offs for non-payment of utility bills that could lead to eviction.
- 4) Other circumstances as determined by the housing Agency.

### C. Hardship Review Process

- 1) The administrative review of the household circumstances will be conducted by SAHA according to current review processes.



- 2) For hardship claims related to imminent risk of eviction, SAHA will conduct an expedited hearing process.
- 3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing Agency's normal grievance procedures.
- 4) SAHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

#### **D. Hardship Remedies**

- 1) The Hardship remedies may include any of the following:
  - a) Allowing an additional interim recertification beyond the normal one-per-year option. This could lower household's TTP (but only as low as the \$100 minimum TTP) until the next triennial recertification.
  - b) Setting the household's TTP at the minimum level for up to 90 days.
  - c) Setting the household's TTP at 28 percent of current income, for up to 180 days.
  - d) Offering a "transfer voucher" to support a move to a more affordable unit (including a unit with lower utility expenses).
  - e) A specific time frame for the temporary TTP or minimum rent may be established for longer than 180 days based on specific circumstances. However, the time frame will never go past the triennial recertification date.
  - f) Any combination of the above remedies.
- 2) During the period when the TTP is reduced, the housing Agency will increase its payment to the landlord to cover the portion of the rent previously paid by the tenant directly to the landlord, and it will notify the landlord of the change and the time period of the increased payments.
- 3) In addition to the remedy or remedies offered, the household may be referred to federal, state or local assistance programs to apply for assistance, or to obtain verification that they are ineligible to receive benefits.
- 4) The Hardship remedies are subject to the following limitations:
  - a) The tenant portion of the rent payments will not be suspended prior to a hardship designation.
  - b) Remedies will not affect any rent attributable to a gross rent that exceeds the applicable payment standard.
  - c) Opting out of the alternative rent policy is not a remedy option.

#### **E. End of Hardship Waiver Period**

- 1) If the hardship continues, the household may submit a request for an extension of the hardship remedy. However, the time frame will never go past the triennial recertification date.
- 2) At the end of the hardship waiver period, the household's regular TTP will be reinstated.

### **III. Transition Period**

#### **A. Selection of Participants**

Study Participants will be randomly selected from the eligible vouchers through a computer generated random selection program. Eligible vouchers will specifically exclude the following:



- Vouchers not currently administered under the Moving to Work Program:
  - Veterans Affairs Supportive Housing (VASH)
  - Moderate Rehabilitation
  - Shelter Plus Care
  - Enhanced Vouchers
- HUD Project Based Vouchers
- Vouchers administered under portability
- Elderly households: Head of Household, co-head, spouse or single member households 62 years or older pursuant to the Administrative Plan
- Households headed by people older than 56 years of age (who will become seniors during the course of the long-term study).
- Disabled households: Head of Household, co-head, spouse or single member households with a disability as defined in the Administrative Plan
- Households currently participating in the Family Self-sufficiency Program
- Households participating in the Homeownership Program
- Households that contain a mix of eligible and non-eligible household members would not be included in the Study

#### **B. Enrollment of Study Group members**

##### **1) Prior to Certification Meeting**

Selected Study Group members will receive special information with their recertification package to introduce them to the rent reform policies and to answer household questions. SAHA will conduct the triennial certification at the time otherwise scheduled for the household annual certification.

##### **2) During Certification Meeting**

At the initial triennial certification, the household will have the changes in rent reform policies explained to them. They will be provided with a gift card as a nominal thank you for providing filling out a base information form.

Changes in the household share, TTP, utility schedule allowance will be provided to the household with no less than 30 days' notice.

##### **3) Mitigation of impact at initial triennial certification**

A “grace period” of six months will be provided to mitigate the impact of the transition for the following two cases:

- a) At the triennial certification at the beginning of the three-year period (and at subsequent triennials), if a household’s current/anticipated income is less than its retrospective income by more than 10%, the current income alone will be used to create a “temporary” TTP for a six-month grace period.
- b) At the initial triennial certification only, if a household’s childcare expense is above \$200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the \$200 to create a “temporary” TTP for a six-month grace period.



After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None



## 9. FY2015-2: Elderly Admissions Preference at Select Public Housing Sites

### i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices for low-income families and was originally approved as part of the FY2014-2015 MTW Plan and implemented November 1, 2014.

### ii. Description/Update

Update: This activity is ongoing and continues to allow the Agency to increase housing choices for elderly residents at selected public housing properties.

Description: This activity establishes a 4-to-1 elderly admissions preference at specific communities in order to increase housing choices for elderly households.

The goal of the activity is to address continuing concerns of elderly residents at specific communities regarding lifestyle conflicts between elderly and non-elderly residents. Property Management's ability to address these conflicts is reduced significantly when the ratio of non-elderly to elderly residents rises above a certain proportion. The 4-to-1 admissions preference is proposed in order to create and maintain an optimal mix of elderly and non-elderly residents in each community.

The idea of an optimal mix is based on research of the reaction to a 1995 Massachusetts law that attempted to limit the percentage of non-elderly disabled tenants living in state-funded elderly housing. In 2002, the Massachusetts Office of Legislative Research provided an update on the success of the 1995 law, which had established optimal proportions of 86.5% elderly and 13.5% non-elderly residents. Housing officials reported that the law had been largely successful in:

1. reducing the number of problems that arise from these mixed populations sharing the same housing;
2. slowing what had been a sharply increasing rate of non-elderly disabled households moving in, and
3. reducing the relatively high percentage of non-elderly disabled tenants in certain projects.

Housing advocates, however, suggested that the optimal proportion should be 80% elderly and 20% non-elderly residents. This MTW activity, FY2015-2, adopts that suggested 80/20 ratio both for its admissions preference as well as for its ultimate unit mix

In practical terms, this activity allows the selection of four elderly applicants from the waiting list before selecting a non-elderly applicant from the waiting list, until such time as an optimal mix of elderly and non-elderly disabled residents is reached for the community. SAHA will use a waiting list preference for elderly families to ensure properties are able to reach the target 80/20 ratio. No residents will be required to relocate in order to meet these targets. The Agency is not establishing a date by which to achieve the 80/20 target, and will rely solely on the normal resident turnover process to gradually transition the population balance.

When a property reaches its target 4-to-1 ratio of elderly to non-elderly residents, SAHA will start to draw applicants using a 1-to-1 ratio of elderly to non-elderly applicants in order to maintain the overall 4-to-1 balance. Should the mix ever tip in the other direction and start to house elderly



residents at a higher ratio than 4-to-1, then SAHA will draw non-elderly disabled residents at a higher rate than elderly residents in order to maintain the overall 4-to-1 balance.

The current properties with the Elderly Admissions Preference are: Fair Avenue, WC White, and Lewis Chatham.

**iii. Planned Non-Significant Changes**

The Agency plans to add Lofts at Marie McGuire to this admissions policy. The proposed change was presented as part of the proposed ACOP policy changes. This property has 63 units and currently has 40% of resident households who are HUD-designated as elderly.

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None



## 10. FY2015-3: Modified Project Based Vouchers (MBPV)

### i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2014-2015 and implemented in the same fiscal year. It has been amended two times since implementation.

#### **FY2019-2020 Amendments:**

- Allocated eighty (80) additional project-based vouchers to support the follow initiatives:
  - THRU Project: Up to ten (10) modified PBVs at SAHA properties will be committed to support a local non-profit organization, THRU Project, in their mission to help foster youth aging out of the foster care system.
  - Family Homeless: Up to twenty (20) modified PBVs at SAHA properties will be committed to support the South Alamo Regional Alliance for the Homeless (SARAH). SARAH is the local Continuum of Care Lead Agency charge to create an improved service system that effectively provides support, coordination, and housing to all homeless populations within San Antonio and Bexar County, with a primary focus on moving individuals and families out of homelessness efficiently and permanently.
  - Beacon Communities or Partnerships: Up to fifty (50) modified PBVs at one of SAHA's Beacon or Partnership properties. These units will support a new workforce initiative as outlined in the proposed activity, FY2020-4: Time-Limited Workforce Housing Pilot Program.
  - Beacon Communities: Up to thirty (30) modified PBVs at a new SAHA - Beacon development. These units will support a new homeless college program as outlined in the proposed activity, FY2020-2: St. Phillips College Homeless Program (SPC-HP).
- Adopted an alternative waitlist policy for the modified PBVs committed that support the THRU Project, Family Homeless Initiative, Workforce Initiative, and St. Phillips College Homeless Program so that the units would be reserved for direct referrals from these partners. (24 C.F.R. 983.251: How participants are selected)
- Received waiver to remove the twenty-five percent (25%) per project cap for the Agency's modified project based units.

#### **FY2020-2021 Amendments:**

- Relocated ten (10) MPBVs previously approved under this activity to a new activity, FY2021-1: Next Step Housing Program (THRU Project).
- Removed the plan to commit 30 modified project based vouchers to support a college homeless program at a tiny home development. This development is no longer moving forward.
- Committed 44 modified project based vouchers at a new development. 100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately \$54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.
- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Agency's Beacon Communities Portfolio. Due to lack of vacancies, the





Agency plans to allocate these vouchers across multiple properties to ensure they are utilized and occupancy needs are met.

- FY2020-4: Time-Limited Workforce Housing Pilot Program: Fifty (50) PBVs have been allocated to St. John's Square, a new property to be constructed under the Agency's Partnerships Portfolio.
- Received waiver to determine contract rents and increases and to determine the content of contract rental agreements that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. In alignment with the agency's goal to increase housing choice, this waiver also allows SAHA to analyze the MAFMRs and SAFMRs and use the higher payment standard on future MPBV contracts.
- Received waiver to remove the requirement that an independent entity must determine the initial contract rent and annual redetermination of rent. This waiver allows SAHA to determine the contract rent in accordance with PBV regulations. Current regulations require SAHA to rely on a third-party to initiate the HAP contract and adjust the rent at any request for rental increase. PBV regulations for determining rent to owner, on the other hand, specify that the amount of rent to owner must be set at the lower of:
  - an amount based off payment standard minus UA;
  - the reasonable rent (determined by a third party); or
  - the rent requested by the owner.

## **ii. Description/Update**

**Update:** This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost effectiveness. This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing thereby increasing housing choices.

**Description:** This activity modifies the standard Project Based Voucher program in two ways.

First, this activity allows SAHA to commit vouchers to developments in SAHA's new and existing properties. The vouchers increase the number of units that are affordable to households based on their actual ability to pay. For example, a tax credit rent affordable to a 30% AMI household will be affordable to a 4-person household earning \$17,640 or more. However, many households earn much less than that, and a 4-person household earning \$10,000 (typical for SAHA-assisted households) is not able to afford a tax credit rent affordable to a 30% AMI household.

SAHA may commit vouchers to any SAHA-owned or SAHA-controlled development. This activity applies only to commitment of vouchers to SAHA-owned or controlled units. Any commitment of vouchers to privately-owned developments will be made through a competitive process outside the scope of this activity.

Secondly, this activity also increases cost effectiveness by removing the automatic provision of a tenant-based voucher to a household who wishes to relocate from a unit associated with a local project based set aside voucher. The removal of the automatic provision reduces HAP costs, and also stabilizes overall occupancy at the communities where vouchers are committed. Previously, activity FY2011-8 provided a tenant-based voucher to a household after two years in the local project based set aside unit.



**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None.

**v. Planned Significant Changes**

None



## **11. FY2017-1: Thrive in Five Program (formerly referred to as Time-limited Working Household Referral Program)**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to promote self-sufficiency and was originally approved as part of the FY2016-2017 MTW Plan and implemented in the same fiscal year.

### **ii. Description/Update**

Update: The Agency is currently preparing to close this activity. In FY2020, the Agency initiated the development of an action plan to address low enrollment; however, as a result of the current pandemic the Agency has concluded the testing of a time limit, work requirement is no longer tenable and not in the best interest of our residents. The Agency is preparing close out activities and will report to HUD in the FY2021 MTW Report.

Description: This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, by providing working households in need of short-term housing assistance an opportunity to quickly access public housing units. This activity seeks to provide targeted assistance to a subset of households that 1) are working, and 2) would benefit from a period of increased housing stability to complete education/training, increase savings, or accomplish another self-sufficiency goal. These households will benefit from accelerated access to housing units, and, due to the time limit on the housing assistance, will transition out within 5 years. By focusing on households that have already started on the path to self-sufficiency, this activity should accelerate the number of households that actually transition to self-sufficiency during the period they receive housing assistance.

### **1. Overview**

This activity provides time-limited public housing assistance to working households referred to SAHA by Workforce Solutions Alamo (WSA). Households referred to SAHA by WSA will receive five years of public housing assistance. If, at the end of five years, a hardship exists, two additional years of assistance are made available.

Upon starting housing assistance, participating households are required to enroll and participate in a SAHA self-sufficiency program such as Jobs-Plus or FSS.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2019-2). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

The total number of households to be served under this activity is currently capped at 200, and will be pulled in at a rate of 25 per quarter. Over 20,000 households are currently on the public housing waitlist. The 200 time-limited households represent 1% of that waitlist. As a result, providing these households with housing assistance will have a very limited impact on other households currently on the waitlist, especially at the draw rate of 25 per quarter. Additionally, it



is expected that the time-limited units will turn over faster than standard units, creating more housing opportunities in the long run.

However, SAHA is taking steps to minimize any short-term negative impacts to non-participants. SAHA will reach out to households currently in waitlist pools whose applications indicate that they are working to notify them of the opportunity provided by this new program. Also, properties with extremely long wait times are being made unavailable to time-limited households, in order to not extend the already long wait times even longer.

## **2. Previous Pilot**

Previously, a pilot project (MTW Activity FY2013-1) was approved as part of the FY2013 MTW Plan. The pilot ended in FY2016. FY2013-1 is now closed out and is replaced with this activity, FY2017-1. This activity builds on the lessons learned from the pilot. Some of those lessons included:

- The pilot activity relied on applicants self-identifying as working households during the application process. A wait list preference was provided to these applicants. However, many applicants that selected the working household preference were in fact not actually working. As a result, staff and applicants spent valuable time in initial meetings that did not result in successful placements. This new activity addresses this challenge by removing the preference. In its place, households will be eligible for a time-limited unit if they are referred by a partner workforce agency.
- Pilot households were required to participate in FSS or similar self-sufficiency activity, but did not always do so. Staff identified a number of factors, including: lack of clear communication and immediate follow up on the requirement, pilot households living in elderly communities (where there are no FSS or Jobs-Plus staff), and the novelty of the requirement (for both staff and applicants). The new activity addresses these factors by partnering closely with workforce partners who will assist in communication, as well as increased understanding of what training areas need to be emphasized.

Activity elements that remain consistent with the pilot include:

- Working households who participate in this activity will receive five years of housing assistance, with a two-year extension if needed based on hardship.
- Hardship policies mirror FSS practices and policies: SAHA can extend the term of the assistance up to 2 years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.
- FSS or Jobs-Plus participation is required -- each FSS and Jobs-Plus family receives case management services from a Case Manager who maintains close communication with the family and works with them to develop individualized plans. These plans establish specific interim and final goals to measure the family's progress toward fulfilling its obligations and becoming self-sufficient.

Changes and new elements that will be incorporated into the MTW Activity to improve program outcomes include:

- The pilot had been oriented to increasing housing choice and self-sufficiency. Now that this activity is referral-driven (instead of wait list preference-driven), the rationale for increasing housing choice by decreasing wait list time is no longer applicable. Instead, the activity will be focused solely on self-sufficiency.



- Households that participated in the previous pilot and remain in good standing will be rolled over automatically into the new program, and their time spent in the pilot will not count against the five-year time limit (the “clock is reset”)
- SAHA and WSA staff are developing a branding and communication strategy regarding the referral program
- SAHA staff will increase messaging of requirements and time limits backed up with strong written policies and procedures
- CDI and PH staff coordinate activities using a master tracking worksheet, that tracks the following:
  - Specific instances when the 5-year term limit is being communicated to participating households
  - If the family refuses to participate in FSS, CDI will inform PH staff, who will initiate eviction proceedings
  - Whether the household is meeting the financial counseling requirement
  - Household cohorts
  - New strategies employed as part of the Individual Plan development (for example, it was discussed that the goals should be focused on how much money it will take for the household to be able to pay flat rent by their 5th year)
  - Hardship tracking process, including all hardships requested
  - Improve methods to ensure families are complying with the rules of the pilot (including retaining employment throughout)
  - Develop a procedure for households moving to section 8

### **iii. Planned Non-Significant Changes**

None

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

The Agency is preparing to close out this activity.



## **12. FY2017-2: Restorative Housing Pilot Program**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to promote self-sufficiency and was originally approved as part of the FY2016-2017 MTW Plan and implemented in the same fiscal year.

### **ii. Description/Update**

**Update:** The Agency is currently closing out this activity. The Agency has stopped receiving referrals. All probationers enrolled will maintain access to SAHA case management on a voluntary basis. All other program requirements will cease once the pilot program has ended. A full close-out report will be provided in the FY2021 MTW Report.

**Description:** This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, through resident services initiatives that provide eligible probationers and their families a public housing preference. This activity identifies a population of underserved residents – probationers – who currently face challenges securing stable housing. By providing a public housing preference, these households can more quickly establish a solid foundation from which to undertake subsequent reintegration and self-sufficiency goals

This activity is a two-year pilot program that will allow for up to 50 adult probationers who are reporting as part of the “Resurgence Collaborative” reentry initiative to have preference for housing on SAHA public housing properties. Probationers will be selected for application into the pilot by the Bexar County Community Supervision and Corrections Department (CSCD). Probationers in the pilot will receive dual case management support from the SAHA FSS Program and their Community Supervision Officer (CSO). The two-year term of the pilot program does not restrict how long residents will be able to continue to receive housing assistance.

The total number of households to be served under this activity is currently capped at 50. Over 20,000 households are currently on the public housing waitlist. Providing probationers and their households with housing assistance will have a very limited impact on other households currently on the waitlist.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2014-4). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

### **1. Target Population**

Bexar County CSCD will select eligible probationers for the pilot based on the Texas Risk Assessment System (TRAS) in order to identify probationers with high housing “needs” and a relatively low risk of reoffending. Probationers identified with a high housing need and low risk will be screened by their CSO for SAHA’s income requirements and disability status to determine their eligibility for SAHA assistance. If the probationer meets SAHA’s income requirements they



will be offered to apply for the Pilot via the Referral Form. The probationer's total criminal history will be taken into account for these risk assessments.

## **2. Criminal History Review**

Probationers will be selected for application to the pilot by the Bexar County Community Supervision and Corrections. Only Bexar County adult probationers currently serving a probation sentence for an allowable offense (Class B misdemeanor, nonviolent Class A misdemeanor, lowest-level controlled substance possession offense, or a first-time burglary offense) will be eligible for the pilot program. Probationers concurrently serving three or more separate probation sentences for allowable offenses or a single probation term for three or more allowable offenses will be ineligible for the Pilot. An exemption to current SAHA Screening and Eviction Guidelines will be required to allow some participants in the Pilot population to avoid automatic denial.

Probationers with a criminal history that includes narcotics distribution, violent felonies, or multiple burglary offenses at any time will be ineligible. Probationers with any allowable offenses within the past five years for which they are not currently serving a probation sentence for will also be ineligible unless the probationer successfully completed a probation sentence(s) for the offense(s) in question. Federal bans on sex offenders and persons convicted of drug manufacturing on federal property remain. In addition, people previously evicted from federally-assisted housing or who have committed crimes on SAHA property in the past will be ineligible for the Pilot.

## **3. Dual Case Management**

Probationers selected for the pilot will be dual-case managed by a SAHA FSS Case Worker and their CSO. FSS will attempt to use only one or two case managers for the Pilot population as will the Bexar County CSCD. Selected probationers must be willing to engage in FSS case management for up to 5 years and if they unilaterally terminate case management they may be evicted. Selected probationers in the Pilot will receive a FSS case manager upon entering public housing, and the FSS case manager's role will be to supervise and motivate clients in conjunction with the CSO. Bexar County CSOs will have the final say on what court-ordered services must be completed and in what order, though the FSS case manager and CSO should coordinate and jointly agree on non-court ordered services and supervision. Selected probationers will be required to report to a CSO at the Barbara Jordan Center location in order to utilize services at the Resurgence Collaborative.

The SAHA FSS Case Manager would work to be present and present materials at SAHA-based hearings related to a Pilot participant; the Bexar County CSO would handle criminal and court-related matters pertaining to offenses probationers in the Pilot may commit. Both case managers should coordinate efforts and meet on at least a monthly basis to review problem cases and problem-solve.

The FSS Case Managers will also coordinate with property managers to address problems as needed. Scheduled meetings with clients do not have to be attended by both managers but efforts and communication should be coordinated so as not to confuse or mislead clients. SAHA will track the results of this Pilot with Bexar County CSCD through the FSS program.

## **4. Pilot Requirements**



The probationers must also stay in good standing with their probation requirements (including substance monitoring and home inspections). Probationers rearrested for violations of their current probation or new criminal offenses may be swiftly evicted from public housing and removed from the lease if determined by their CSO and SAHA. Family members would not be subjected to eviction if another adult in the household is capable of taking over the lease, unless otherwise determined by SAHA and the Bexar County CSCD.

Pilot Probationers who must go to residential drug treatment will not forfeit their public housing unit provided they have other immediate family members already living in the unit and capable of maintaining the lease. Probationers exiting residential drug treatment would still be able to apply to the pilot, if all other eligibility requirements are met. An MOU will be created for the Pilot to share information between SAHA and the Bexar County CSCD. In addition to the MOU the participating probationers will be required to sign a release of information form in order for the CSCD to share any case specific information (i.e. drug tests) with the SAHA case manager.

Probationers who are evicted due to an arrest or violation will be ineligible to apply for the Pilot in the future. Evicted probationers' spots in the Pilot will be recycled into the population cap for each pilot program. The same will apply for those probationers who leave public housing either voluntarily or through increased self-sufficiency. Individuals who finish their probation requirements may still be required to meet with a FSS case manager, and their spot will be recycled into the Pilot population cap.

Probationers will be required to obtain services at the "Resurgence Collaborative" at the Barbara Jordan Center determined by their FSS case manager and CSO. Services not provided at the Resurgence Collaborative may be completed through FSS/Probation's existing network of services providers. In addition, the FSS case manager will work to engage family members in services offered at the Resurgence Collaborative to build self-sufficiency in the entire family.

## **5. Pilot Logistics**

Up to 50 probationers reporting as part of the "Resurgence Collaborative" reentry initiative and their immediate families will be allowed prioritized access to public housing at SAHA properties over a two-year period. The population cap of 50 will include both probationers coming into new public housing units with their families and probationers who are being allowed to move in with immediate family members that are already living in public housing properties.

Probationers selected for the Pilot will be given a signed referral from their CSO to present to SAHA staff at the Unified Application Center. The Referral Form will be created specifically for this Pilot and will be based on similar referrals for other SAHA special populations/projects. If probationers apply to the Pilot and their term of probation expires before a spot in the Pilot becomes open, their Referral will expire and they will have to reapply to obtain SAHA housing assistance. Probationers who commit a crime after being accepted into the Pilot but before moving into their unit will be removed from the Pilot.

## **6. Outcomes**

According to 2012 Byrne CJI Grant Implementation Plan Data collected by Trinity University, the Choice Neighborhood footprint (location of the Resurgence Collaborative), offenders in the footprint have higher rates of recidivism (re-arrests) and a higher arrest rate. The number of people per ZIP code on probation in the footprint is twice that compared to other ZIP codes in





Bexar County. Additionally 52% of probationers who live in these ZIP codes had their probation revoked instead of completed, compared to 41% for Bexar County as a whole. Focus groups conducted by Trinity University with probationers also found that transportation is one of the most significant barriers for probationers. Together this baseline data illustrates that the Choice Neighborhood has a higher percentage of probationers, these probationers struggle with basic needs such as transportation, and these probationers have their probation revoked or re-offend at a greater rate than Bexar County as a whole.

The program is anticipated to reduce recidivism among probationers. The prioritized access to housing in the Pilot will also allow SAHA to determine the effect of immediate housing on probationers in regards to such measures.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

The Agency is preparing to close out this activity.



### 13. FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation

#### i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2018-2019 and implemented in the same fiscal year.

- FY2018-2019: Phase I was approved and implemented
  - Established 2-Tier Policy Map
  - Set a subsidy cap of \$1.5M for higher cost areas
  - Set payment standard schedule outside the 90-110% of the MAFMR and SAFMRs
  - Established an exception overlay
- FY2019-2020: Phase II was approved and implemented
  - Expanded the number of small areas from two (2) to ten (10),
  - Eliminated the subsidy cap from Phase I,
  - Set payment standard schedule outside the 90-110% of the MAFMR and SAFMRs, and
  - Updated the exception overlay mechanism.

#### ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to increase housing choices. Phase II was implemented for new admissions and movers effective January 1, 2020 and recertifications effective February 1, 2020.

Description: This activity is designed to achieve the MTW statutory objective to increase housing choices for low-income families, by creating payment standards that better reflect market conditions in different parts of San Antonio, and so making a larger number of San Antonio neighborhoods affordable for voucher households. This activity is a local implementation of HUD's Small Area Fair Market Rents (SAFMR).

Because of the potential impact (positive and negative) on a large number of voucher households, SAHA implemented the activity over multiple fiscal years in order to control for negative and unanticipated consequences, to make use of the latest research and market data, and to maintain the number of households served. HUD approved this phased-in approach in FY2019. Below are the principles and parameters the Agency used in the development of the activity:

1. Maintain Number of Households Served
  - a. No decrease in capacity to serve the same number of households
2. Minimize Negative Impact
  - a. Minimize negative impact for existing households in low-cost neighborhoods
  - b. No disparate impact on protected classes, including locally recognized classes (sexual orientation, gender identity, veteran status, and age)
3. Make the SAFMR as easy to use as possible
  - a. Households and landlords have limited time and resources; program design should facilitate program implementation
4. Leverage the Value of the Voucher



- a. Maximize value of vouchers in targeted growth areas and rapidly changing neighborhoods

**Local Submarket Payment Standards:** This activity makes use of one waiver: establish local submarket payment standards.

Currently, the Department of Housing and Urban Development (HUD) publishes fair market rents (MAFMRs) annually for each metropolitan statistical area in the United States and requires each housing authority to adopt a payment standard schedule for each MAFMR area in its jurisdiction. HUD allows housing authorities to establish the payment standard amounts at any level between 90% and 110% of the published FMR. Payment Standards are used to calculate the maximum subsidy that the PHA will pay each month toward rent and utilities for families with Housing Choice Vouchers.

Prior to the implementation of SAFMR, the process for establishing payment standards includes analyzing the published MAFMRs when published, presenting the recommended schedule to the Board of Commissioners for approval, and implementing the new schedule over a twelve month phase-in for clients that have a reexaminations and all new admission contracts effective on or after the effective date. Due to biennial and triennial recertifications under the agencies MTW status, the impact to HAP expenditures are typically phased-in over a period of three years.

Under the new Small Area Fair Market (SAFMR) regulation, the San Antonio Housing Authority is required to implement this process using SAFMRs which are based on ZIP codes as opposed to the San Antonio-New Braunfels Metropolitan Statistical Area; however, because the Agency is designated as a Moving to Work (MTW) Program, it is authorized to adopt and implement any reasonable policy to establish payment standards for housing choice vouchers that differ from the currently mandated program requirements. The Agency requested and received a waiver in Year 1 (FY2018-2019).

On June 27, 2019, the Agency received HUD approval to extend this MTW Agreement provision to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

To stay consistent with the annual payment standard update approval process, new payment standard schedules will be approved by a separate Board Resolution. Annual modifications to payment standards are allowed with SAHA Board approval where appropriate/necessary. The Agency anticipates reviews of the payment standards every year in August/September when new SAFMRs are published by HUD.

**Zip Code Grouping methodology:** The Agency explored a variety of grouping options ranging from five to fifteen groups using a cluster analysis based on the published HUD SAFMRs. The goal of the clustering was to minimize within tier rent differences and maximize between tier differences. This would ensure that when the payment standard was set for each tier, it would be an appropriate amount for all zip codes within the tier. The ten tier option was chosen after considering administrative burden, financial impact, and after building consensus with local stakeholders. In addition, the Agency had implemented HUD's SAFMR for its smaller special programs using ten (10) tiers - which offered some consistency for staff, clients, and landlords. As of FY2020, special programs are now under SAHA's MTW implementation of SAFMRs. .



**Payment Standard methodology:** The Agency reviewed various methods for setting the payment standard in each Tier. The goal of the review was to establish a method that allowed the Agency to consistently determine payment standards for each tier and bedroom size while also balancing the financial impact. The method that found the balance between the financial impact and the goals of the SAFMR policy was determined to be ninety percent (90%) of the minimum SAFMR within each Tier. For example, in Tier 1 there are seven (7) ZCTAs. The minimum or lowest SAFMR for a two-bedroom among these seven zctas is \$790. The payment standard for the two-bedroom is set to ninety percent (90%) of \$790, or \$711. This method was applied to all ten tiers and all bedroom sizes.

**Exception Overlay methodology:** The intent of the exception overlay is to establish a mechanism that provides greater flexibility to adjust payment standard schedules to mitigate involuntary displacement in rapidly changing markets and/or coordinate support for place-based redevelopment or revitalization initiatives (such as Choice Neighborhood). The overlay can include entire ZIP codes or smaller geographies such as census blocks, tracts, and locally defined neighborhoods. Areas are selected based on timely market information and other local information that support the need for a higher payment standard.

The Agency established an exception overlay in FY2018 that consisted of seven (7) ZCTAs. These areas were selected after reviewing a City of San Antonio report on housing vulnerability that highlighted areas where property values had risen the fastest in the city.

As part of the update to Phase II, the Agency reviewed additional available data including change in land value, home value, gross rents and determined that only minor updates to the current overlay were justified. Two ZCTAs (78215 and 78235) were removed from the overlay because there were no voucher holders. Thus, the need for involuntary displacement of existing voucher clients is not appropriate; rather, the goal for these ZCTAs is to make them more accessible to new clients through the new tiered system. Both ZCTAs are now in tiers with substantially higher payment standards than the current payment standards.

The Agency has also developed a list of ZCTAs that are anticipated to experience market pressures in the near future. As an early warning mechanism, these areas will be monitored closely during Phase II in addition to the relief provided under the exception overlay policy. The Agency may conduct targeted market studies to determine if any area needs to be added to the exception overlay and/or moved to a higher payment standard tier.

**Hardship policies:** This activity is not expected to impact existing clients tenant share; however, the Agency recognizes the need for a hardship policy in concert with the proposed policy changes to ensure that households with documented urgent needs or extenuating circumstances are not unduly burdened by the policy changes.

SAHA's current policy on financial hardships regarding minimum rent and zero income declaration will continue to apply to participants under this activity in accordance with §6.3.A(3) and §6.3.B of the Administrative Plan. In addition, the Agency has two MTW activities with special hardship policies: FY2014-6: Rent Simplification and FY2015-1: MDRC/HUD Rent Reform Study. Hardships outlined in those activities will apply under this activity. Please refer to the MTW activities listed above in Section 4 of this plan for specific hardship criteria. Unless otherwise noted, all elements are applicable for all three activities.

The agency has adopted two SAFMR-specific mechanisms to provide protection for clients including (1) Hold Harmless Policy and (2) Exception Overlay Policy. In addition, clients have



access to existing hardship and reasonable accommodation policies outlined in 16.2.B(7) of the Administrative Plan. The mechanisms specific to SAFMR are described below.

**Hold Harmless Policy:** For families whose payment standard falls outside of the basic range as a result of a decrease in FMRs (including a decrease in FMRs due to the implementation of Small Area FMRs), SAHA will not reduce the payment standard amount for as long as the HAP contract remains in effect.

### **Exception Overlay Policy**

**A. Exception Overlay Policy:** Households will receive automatic exception overlay relief, as discussed below, if:

- a. The household is currently under contract for a unit located in the Agency's exception overlay.
- b. The landlord requests an increase in the rent amount after the first contract year and the new contract rent is determined to be reasonable through the Agency's rent reasonableness process.
- c. The household's new total monthly family contribution as a percent of household income (rent burden) increases by more than 10% from the current rent burden and the household realizes it's unable to afford their rent portion as a result of the increased contract rent.
- d. The new monthly increase is not a result of a change in household circumstances.

**B. Exception Overlay Policy Remedy:**

- a. SAHA will cap the total monthly family contribution at the current amount for the remaining months in their current lease term.

### **iii. Planned Non-Significant Changes**

None

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

None



## **14. FY2019-2: Alternate Recertification Process (PH and HCV)**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by providing an alternate schedule for the annual reexamination process, specific PH review procedures, and certification methods of income and assets. The use of oral verifications reduces SAHA's administrative costs for postage, paper and envelopes when mailing written third party verification to the client's employer. The activity was approved in the FY2018-2019 MTW Plan and implemented in FY2018-2019.

### **ii. Description/Update**

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has three main components that are designed to streamline and simplify the recertification process: (1) alternate schedule, (2) alternate public housing review procedures, and (3) alternate income verification methods. It consolidates and updates three previously approved activities related to the first two elements (FY2014-4 Biennial Reexaminations, FY2014-5 Triennial Reexaminations, and FY2016-2 Biennial and Triennial Notification of Rent Type Option) and adds a new waiver for the third element.

#### **(1) Alternate Recertification Schedule (PH and HCV)**

This proposed activity establishes biennial and triennial schedules for reexaminations for the low income public housing and housing choice voucher programs. The Agency has been using alternative schedules since 2011; this new activity streamlines the schedules across both programs. The effective change will move approximately half of public housing households from biennials to triennials; the other half of public housing households will remain on the biennial schedule. The housing choice voucher program will continue current biennial and triennial reexamination schedules. Every household will have the option of interim reexamination if there is a change in household composition or income according to HCV and PH policy.

Beginning FY2016, SAHA created a local form with an expiration date of 39 months to replace the HUD-9886 Form with its 15 month expiration date. In the future, SAHA may create its own local forms with different expiration dates or other elements to accommodate this activity.

**Definitions:** For purposes of assigning a recertification schedule to each household, the Agency will utilize the following to apply the two schedules:

**Triennial:** A household is eligible for a triennial schedule if the household has at least one elderly or disabled household member and the household receives 100% of their income from fixed sources. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.

**Biennial:** Households not eligible for a triennial schedule are eligible for a biennial schedule.

#### **(2) Alternate PH Review Procedures (PH only)**



Typically in the low income public housing program, PHAs are required to inform public housing residents of the option of paying income-based rent or a flat rent on an annual cycle. Additionally, PHAs are obligated to conduct annual updates of family composition for these public housing families who have chosen to pay flat rent regardless of HUD-allowed triennial recertifications for those families.

As residents move to biennial and triennial recertification schedules, it becomes more efficient to coordinate notification and update requirements in accordance with their new recertification schedules. Therefore, SAHA proposes to conduct review procedures related to flat rent notice and family composition updates for PH individuals at the time of reexamination.

### **(3) Alternate Income Verification Methods (PH and HCV)**

Currently, SAHA accepts self-certification for assets valued below \$5,000. In order to further streamline administrative processes, SAHA will accept the family's self-certification of the value of family assets and anticipated asset income for net assets totaling \$25,000 or less. Third-party verification of assets is still required for assets totaling a value more than \$25,000.

According to HUD's Verification Hierarchy, SAHA must send a form to third-party sources for verification of income if the tenant-provided documents are not acceptable or are disputed. In order to increase the rate of files completed in a timely manner, SAHA will skip the third-party verification form and instead use oral third party verification when tenant-provided documents are unacceptable.

In addition to streamlining methods of document verification, SAHA wanted to reduce the number of applicants re-submitting documents for approved extensions of voucher (if in HCV Program) and/or reasonable accommodations. SAHA has revised its policy to extend the length of time that applicant-provided documents would be valid for verification purposes. Applicant-provided documents dated within 90 calendar days from the eligibility appointment would be valid. This does not apply to permanent documents such as social security cards, birth certificates, and identification cards.

Both methods will apply to the low income public housing and housing choice voucher programs, unless explicitly exempted.

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

#### **iii. Planned Non-Significant Changes**

None

#### **iv. Planned Changes to Metrics/Data Collection**

None

#### **v. Planned Significant Changes**

None



## **15. FY2020-1: College & University Homeless Assistance Programs (formerly Palo Alto College, College Homeless Assistance Program)**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan and implemented in the same fiscal year.

### **ii. Description/Update**

Update: This activity is in early implementation and initial recipients are expected to be leased by the end of FY2020.

Description: The activity supports the creation of a homeless set-aside program(s) in partnership with local college(s) and university(ies) to address the local housing needs of homeless college and/or university students.

The Agency is tackling this local housing need with a tenant-based set-aside voucher. Because these set-asides will have time limits, alternative eligibility requirements, and are married to homeless college/university pilot program(s), they are being proposed separate from the Agency's set-asides allocated under FY2011-9.

This activity allows the Agency to initially set-aside up to 20 tenant-based housing choice vouchers for households referred by Palo Alto College (PAC) and 30 tenant-based housing choice vouchers for St. Philip's College. The Agency may set-aside additional vouchers to support additional college(s) and/or university(ies) who enter into a partnership with the Agency.

Students seeking housing vouchers through the Homeless Assistance Program(s) must meet criteria outlined by the partner agency. Partner Programs may have slightly different college/university program eligibility requirements. Eligibility for SAHA housing will remain consistent across all programs. Students must adhere to both sets of requirements.

Students receiving housing assistance through this set-aside must meet SAHA eligibility criteria for income levels, background check and lawful residency. Students will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), MTW alternative payment standard schedules (see FY2019-1: Local Small Area Fair Market Rent Implementation), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)). Students have up to one semester after graduation to secure housing at which point students are no longer eligible for the housing voucher.

In addition, this proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;





- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

1. a local educational agency homeless liaison
2. the director of a program funded under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director; or
3. a financial aid administrator.

Rental leases executed under this program will follow standards as regulated by Section 8(o)(7) of the housing act and 24 CFR 982.308-982.310. While the Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

### **iii. Planned Non-Significant Changes**

The Agency is currently working with a local community college to implement an additional College Homeless Assistance Program at additional campuses. The program will be consistent with the framework originally set out in this activity operating within the current waivers approved in FY2020.



**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None

**16. FY2020-3: Family Self Sufficiency (FSS) Program Streamlining**

**i. Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by creating administrative efficiencies in the Family Self-Sufficiency Program. The activity was approved in the FY2019-2020 MTW Plan.

**ii. Description/Update**

Update: This activity has been implemented. Due to recent changes in HUD regulations, the Agency is no longer tracking the elimination of the 120 day rule under this activity.

Description: The overall goal of this activity is to create operational efficiencies that will maximize engagement in the FSS program. The Agency is requesting the following:

1. **Modify FSS Contract:** The Agency is proposing to modify the FSS contract to align its policy in its Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. Currently in the Agency's HCV program, a participant's TTP is calculated per the approved MTW activity, FY2014-6 Rent Simplification. This FSS-related waiver would allow the Agency's FSS contracting process to be consistent with current and future PH and HCV alternative rent policies.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

None



## 17. FY2021-1: Next Step Housing Program (THRU Project)

### i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices. The activity was approved in the FY2020-2021 MTW Plan.

### ii. Description/Update

Update: This activity has been implemented and is ongoing.

Description: The housing assistance provided by the Agency is intended to allocate vouchers to youth aging out of foster care who are at risk of homelessness. The voucher provides the youth the ability to lease decent, safe, affordable housing in the private housing market.

### Partner Program Overview

THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness<sup>2</sup>. It will offer housing options and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth, in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and ultimately our most basic need; shelter. Each placement will focus on preparing the youth for living on their own while strengthening future families and breaking the negative cycles.

The THRU project will provide a range of services, including:

1. Housing search assistance
2. Life-skills course
3. Home visits by case manager
4. Access to employment specialist
5. Participants are also required to save a percentage of personal income, on a sliding scale, so that at the end of the one year they have at least \$2,500 in savings

### Activity Overview

Currently, ten (10) modified project based vouchers have been allocated and committed to Woodhill Apartments to support this partnership as approved under FY2020 amendments to the FY2015-3 Modified Project Based Vouchers activity. To date, there have been no successful placements. After a post-implementation review, the Agency and partner have identified program design changes that require additional MTW waivers.

SAHA is proposing to contribute up to 36 months of housing assistance to support youth being served by the Next Step Housing Program. Below is a summary of how SAHA's housing assistance will provide support.

#### Year 1 (12 months)

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<sup>2</sup> Youth may currently be in extended foster care.



- Youth are enrolled in the Next Step Housing Program and receive housing assistance from SAHA through a modified project based voucher at Woodhill Apartments.
  - Youth will have rent calculated as prescribed in FY2014-6 Rent Reform and will also have their portion capped at \$100 -- SAHA will cover any additional tenant rent portion with increased housing assistance.
  - Youth will have access to the modified project based unit and rent cap for one year only.
  - SAHA will also waive the initial rent burden rule which states that when a family initially leases and the gross rent of the unit exceeds the applicable payment standard for the family, the dwelling unit rent must not exceed 40 percent of the family's adjusted income.

#### **Years 2 and 3 (24 months)**

- Once youth complete the first year (12 months) Next Step Housing Program, they will have the option of continuing on housing assistance with a traditional tenant based voucher provided by SAHA.
  - Youth must be recommended by the partner for continuance in the voucher program
  - Youth will have access to the tenant-based voucher for an additional 24 months and will benefit from the choice to remain at Woodhill Apartments or move to another housing unit within SAHA's jurisdiction.
  - Youth will have their tenant rent portion calculated as prescribed in FY2014-6: HCV Rent Reform (consolidates previously approved activities FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule) and will NOT have their portion capped at \$100.

#### **Alignment with other MTW activities**

- Due to the nature of the program, youth will have an annual recertification every 12 months and will not follow alternative recertification processes established under FY2019-2: Alternate Recertification Process (PH and HCV).
- Youth admitted under this activity will follow the Agency's alternative implementation of small area fair market rents as established under FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.

#### **iii. Planned Non-Significant Changes**

None

#### **iv. Planned Changes to Metrics/Data Collection**

None

#### **v. Planned Significant Changes**

None



## **B. Not Yet Implemented Activities**

### **1. FY2020-2: St. Phillips College Homeless Program (SPC-HP)**

#### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan.

#### **ii. Description/Update**

Update: This activity is not implemented. Due to current development limitations, the Agency is pursuing this partnership under FY2020-1 College & University Homeless assistance programs to meet immediate housing needs. The Agency continues to work on new development planning to determine whether the project-based voucher model can be pursued.

Description: The activity supports the creation of a homeless set-aside program in partnership with a local community college to address the local housing needs of homeless college students.

This proposed activity would allow the Agency to attach the new program to modified project-based units at a new SAHA development. The units at the new development will be limited to homeless college students referred by St. Phillips College (SPC).

The SPC program has the following elements:

- (1) Housing: SAHA will provide rental assistance or housing for up to 30 SPC students and dependents who are homeless or near homeless<sup>3</sup>. The rental assistance would be limited to three years.
- (2) Education: Students must (1) remain enrolled in 12 or more academic credits and otherwise make adequate academic progress toward a degree (SPC will track the adequacy of the student's progress); (2) maintain GPA above 2.5 to maintain housing assistance; (3) complete 64-80 of community services hours per semester; and (4) participate in support services provided by SPC.
- (3) On-Campus Support: SPC will administer the homeless college student program to include managing a program waitlist, providing SAHA the referral, assisting the student through the leasing process, tracking academic progress, and providing supportive services during the students' tenure in the college program.

This proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;

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<sup>3</sup> Students and their families must meet HUD's definition of homeless (which encompasses the US Department of Education's definition of homeless). In addition, student eligibility rules as outlined in 24 CFR part 5, subpart F would remain applicable.



- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

- 1) a local educational agency homeless liaison
- 2) the director of a program funded under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director; or
- 3) a financial aid administrator.

Rental leases executed under this program will follow standards as regulated by Section 8(o)(7) of the housing act and 24 CFR 982.308-982.310. While the Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

**Local Need Identified:** The Alamo College District is a community college system with campuses located throughout the San Antonio area. Populations of homeless students have been identified, some sleeping in their cars in college parking lots at several campuses. Over 300 homeless and/or youth aging out of foster care students are currently enrolled at ACD, which is approximately 2.3% of students enrolled. St. Phillips College (SPC) is a community college located in the San Antonio neighboring several of SAHA existing housing communities as well as SAHA undeveloped land parcels. It is also located within the federally designated Eastside Promise Zone (EPZ).



St. Philip's College was founded in 1898 in San Antonio by the Episcopal Diocese of West Texas. The College has evolved from its humble beginnings as an industrial school into a fully accredited two-year institution of higher education serving a diverse student population. The College has expanded to include two campuses -- Martin Luther King Campus (MLK) and Southwest Campus (SWC). It is the only institution of higher learning in the nation officially designated as a Historically Black College and Hispanic serving institution.

**Becoming Part of a Local Solution:** SAHA is currently working on a robust housing expansion plan (see Appendix 5.2) and would like to leverage those plans to help address a local housing need that has been identified by its partners. There are several SAHA-owned undeveloped land parcels near the St. Phillips College that could support a new development with dedicated modified PBVs.

Through the Agency's current modified PBV activity (FY2015-3) the Agency plans to commit up to thirty (30) project-based vouchers as part of future development. The proposed activity below outlines the homeless college student program that will be supported by the modified PBVs.

**iii. Planned Non-Significant Changes**

None

**iv. Planned Changes to Metrics/Data Collection**

None

**v. Planned Significant Changes**

The Agency is currently working with the partner to implement a College Homeless Assistance Program using the framework set out in FY2020-1.



## **2. FY2020-4: Time-Limited Workforce Housing Pilot Program (PBV)**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to promote self-sufficiency by providing on-site supportive services that promote self-sufficiency. The activity was approved in the FY2019-2020 MTW Plan.

### **ii. Description/Update**

Update: This activity has not been implemented and is currently on hold pending the new development process for St. John's Square.

Description: This pilot is supported by the Agency's current modified PBV activity (FY2015-3) through a commitment of fifty (50) project-based vouchers at St. John's Square.

The pilot project (max 50 households) for working residents provides time-limited housing assistance at selected sites where MTW modified PBVs have been committed. Working households at 50% of the area median income and who do not exceed 80% of the area median income, who choose to apply would receive five (5) years of housing assistance, with a two year extension if needed based on hardship.

SAHA will partner with SA Works to help provide a pipeline of both employers in the area and individuals to fill the units. SAHA would work directly with SA Works and the participating employers to not only ensure the units are filled, but also to create a career path for program participants. A separate waitlist would be created for those individuals who qualify for the program.

SAHA will work with the following partners to implement this initiative: local workforce partners (Project Quest, Goodwill Industries, Workforce Solutions Alamo), local employers (such as hospitals, restaurants, hotels), and a local developer. The partners will execute an MOU that outlines the roles and responsibilities for each party.

SAHA will also hire a Resident Services Coordinator to work with and mentor program participants to improve retention and success rates for the program. This position will be funded through the operations of the development at a cost of \$60,000 a year to include benefits.

Hardship policies: SAHA can extend the term of the assistance up to two (2) years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.

### **Program Qualifications:**

Participants would be responsible to pay their portion of rent as calculated FY2014-6: HCV Rent Reform and would be required to meet with the SAHA Resident Services Coordinator, to assist with career opportunities and advancement. Participants would also be required to be employed by one of the employers participating with SAHA's partner for this program, SA Works. The program would also require participants to commit to career paths provided by their employers in their respective fields in order to further increase their salaries.

Potential clients will be referred to by either the partner employers or workforce partners to the Resident Services Coordinator who will then determine eligibility. The Resident Services





Coordinator will work with property management to ensure annual eligibility and to determine any hardship cases. Property management will also be responsible for compliance adherence and reporting.

All potential residents must attend SAHA's Early Engagement Program or demonstrate that they have attended the following SAHA approved classes: Financial Literacy, Housekeeping or How to be a good tenant, Conflict Resolution, and Tenant's Rights and Obligations. Potential resident must demonstrate that they have been employed a minimum of 90 days with the existing employer.

Partner employers must demonstrate that the potential resident is on a career path, such as their management programs, to detail how the resident will advance and achieve self-sufficiency within the five (5) year limit of housing assistance. SAHA, the respective workforce partners, the employer, and the resident will execute a contract that details the resident goals that could include the following:

1. **Financial/Asset Building:** Opening and maintaining Checking and Savings Accounts; Household has saved at least 3 months of monthly expenses, Improving Credit Scores to qualify for market rate housing and/or homeownership; secure reliable transportation
2. **Employment/Retention/Advancement:** Maintains employment with the existing employer through the duration of the contract or with another employer within the existing industry; advances within the set career path plan set forth by employer
3. **Income:** Increase income throughout the contract period and achieve 80% AMI at or before the end of the 5 year limit
4. **Education/Training:** Secure High School Diploma or GED; secure post secondary degree(s); complete industry recognized certifications; if needed, complete English As a Second Language Program

All participating residents must maintain good standing and meet with the Resident Services Coordinator on a monthly basis to report the progress of the goals.

Participants will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)).

### **iii. Planned Non-Significant Changes**

None

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

None



## **1. FY2021-2: Limiting increases in rents**

### **i. Plan Year Approved, Implemented, Amended**

This activity is designed to increase housing choices for low-income families who might be experiencing a loss of income or other economic hardship, and are unable to pay additional rent. The activity was approved in the FY2020-2021 MTW Plan.

### **ii. Description/Update**

Update: This activity is scheduled to be implemented in February 2021.

Description: Recent weeks have seen historic levels of unemployment claims in San Antonio and throughout the country. SAHA has seen a spike in reports of loss of income from residents. At the same time, landlords are seeking to increase rents. The agency is concerned this will negatively impact tenants as SAHA may cover part of the increase (up to the payment standard) but tenants more than likely will receive an increase in their rent portion.

This activity uses the Agency's MTW flexibility to limit voucher contract rent increases to no more than 3%, in order to prevent terminations or evictions, and maintain a constant and predictable tenant rent. The Agency arrived at 3% by conducting a historical rent increase analysis. The Agency will continue to monitor rental rates and make adjustments to the cap as necessary. This activity will be sunsetted after 24 months, or sooner, if the national funding situation improves, and the agency is able to meet MTW requirements of serving substantially the same number of households.

### **iii. Planned Non-Significant Changes**

The Agency is currently evaluating whether the cap should be increased to 5%.

### **iv. Planned Changes to Metrics/Data Collection**

None

### **v. Planned Significant Changes**

None



## C. Activities On Hold

### FY2014-2: Early Engagement (EEP)

#### i. Plan Year Approved, Implemented, Amended

This activity is designed to increase housing choices by providing training to support successful participation in SAHA's Federal Housing Programs, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. After a hold period of several months during FY2015, this activity resumed in FY2016. The pause in the activity was due to prioritizing lease-up over other considerations.

#### ii. Description/Update

Update: Effective March 16, 2020, the Agency implemented its Workplace Transition Plan, Transition Level 1, Emergency Operations. On June 22, 2020 the Agency transitioned to Level 2, Modified Operations. As a result, all EEP sessions were cancelled. The last EEP session was held in February 2020. In addition, the following actions have impacted this activity:

- Suspension of evictions for non-criminal activity
- Suspension of transfers, move-ins, and move-outs
- Suspension of all resident activities
- Suspension of terminations
- Modifications of voucher issuance for current and new clients
- Closure of Section 8 lobby and property management offices

Description: This activity establishes a requirement that applicants complete a defined set of courses upon admission to the Public Housing (PH) or Housing Choice Voucher (HCV) programs. Failure to attend a required EEP briefing may be cause for denial. The courses are designed to provide incoming families with the skills to be successful residents and tenants, while establishing clear expectations and minimizing the number of crisis situations over the long term. The curriculum is the product of formal partnerships with other agencies who participate as instructors or advisors in the design and implementation of the courses. Topics include finding the right home/neighborhood, working with landlords, financial literacy, fair housing, safety, upkeep and sustainability.

Elderly and disabled heads of households are exempt from the requirement, but encouraged to take the courses. Those who successfully complete the courses will receive a certificate.

#### iii. Planned Non-Significant Changes

None

#### iv. Planned Changes to Metrics/Data Collection

Remove the SAHA metric - "Percent of households who attended the program and subsequently exited the housing program for a negative reason (PH + HCV)".



During the deep dive discussions it became clear that EEP alone cannot reduce negative exits. SAHA is revisiting the EEP programing and will identify metrics that are better aligned with EEP's objectives, this may include tracking participant enrollment and participation in SAHA programs after attending EEP, housing stability for 6-12 months after EEP, etc.

Early Engagement lays the foundation of successful participation by informing clients of program requirements and introducing clients to SAHA and partner resources available. Early Engagement coupled with other preventive and intervention efforts may have a stronger probability of reducing negative exits. The agency will continue its deep dive to identify the appropriate preventive and intervention efforts to reduce negative exits and any relevant metrics associated with these efforts.

#### **v. Planned Significant Changes**

This activity is on hold as a result of the ongoing pandemic.

### **D. Closed Out Activities**

#### **FY2011-1      Block grant funding with full flexibility**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out due to its reference to the MTW Single Fund Flexibility, and not to any additional waivers.

#### **FY2011-1a      Promote Education through Partnerships**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

#### **FY2011-1b      Pilot Child Care Program**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The pilot childcare training program ended in the fall of 2011. While the program did have some success in FY2011 in assisting 10 residents in their completion of child care training and certification, there was not enough support for the program to continue. This activity was closed out in FY2011-2012.

#### **FY2011-1c      Holistic Case Management**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

#### **FY2011-1d      Resident Ambassador Program**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.



**FY2011-2**                    **Simplify and streamline HUD approval process for the development, redevelopment, and acquisition of Public Housing**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because faster transaction times have reduced the need for this activity.

**FY2011-3**                    **Biennial reexamination for elderly/disabled (PH)**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by new activities FY2014-4 and FY2014-5.

**FY2011-4**                    **Streamline methods of verification for PH and HCV**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by new activity FY2014-1.

**FY2011-5**                    **Requirements for acceptable documents for PH and HCV**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by new activity FY2014-1.

**FY2011-6**                    **Commitment of project-based vouchers (PBV) to SAHA-owned or controlled units with expiring subsidies (HCV)**

This activity was designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is proposed to be closed out because it will be superseded by FY2015-3 upon approval of this MTW Plan.

**FY2011-7**                    **Remove limitation of commitment on PBV so that PBV may be committed to more than 25% of the units in family developments without required provision of supportive services**

This activity was designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is closed out because it has been superseded by FY2015-3.

**FY2011-8**                    **Revise mobility rules for PBV**

This activity was designed to increase cost efficiency, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is proposed to be closed out because it will be superseded by FY2015-3 upon approval of this MTW Plan.

**FY2012-10**                    **Biennial Reexamination for Elderly/Disabled Participants on Fixed Income (HCV)**

This activity was originally approved as part of the FY2011-2012 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by FY2014-4.



**FY2012-11**      **Local Project Based Voucher Program for Former Public Housing Residents**

This activity was originally approved as part of the FY2011-2012 MTW Plan was closed out before implementation due to discussions with HUD about RAD option.

**FY2014-1**      **Streamline Reexamination Requirements and Methods (HCV)**

This activity was designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. This activity was closed out as of FY2016, due to staff analysis finding that it was no longer needed.

**FY2013-1**      **Time-limited Working Household Preference Pilot Program**

This activity was designed to increase housing choices and promote self-sufficiency, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation started in FY2014. This pilot activity is proposed to be closed out as of FY2017 and upon approval of this plan. Staff analysis of the pilot identified process improvements that will be implemented in a new MTW Activity proposed for FY2017. Pilot households will be transitioned into the new MTW Activity or the standard public housing program.

**FY2013-3**      **Standardize Section 8 and Public Housing Inspection Progress**

This activity was designed to unify Section 8 and Public Housing inspection standards. The intent was to raise lower standards to a higher, uniform level. It was anticipated that UPCS (Public Housing) would serve as a model for most elements, but some were to be derived from HQS (Section 8). This activity has been on hold until now, pending results of HUD tests at other PHAs. HUD has completed the study and is now conducting a demonstration. SAHA has no plans to participate in the demonstration and will implement new inspection standards for Section 8 in accordance with any new guidelines set forth by HUD. This activity was closed out as of FY2017.

**FY2014-4**      **Biennial Reexaminations (HCV and PH)**

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.

**FY2014-5**      **Triennial Reexaminations (HCV)**

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.

**FY2016-2**      **Biennial and Triennial Notification of Rent Type Option**

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.



## Section V. Sources and Uses of Funds

\*\*\*To be updated per FY2022 budget as approved by the Board of Commissioners scheduled in June 2021. Current figures are estimates based on FY2021 budget.

### A. Estimated Sources and Uses of MTW Funds

#### i. Estimated Sources of Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$9,216,480
70600	HUD PHA Operating Grants	\$138,561,623
70610	Capital Grants	\$4,820,923
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$443,282
71600	Gain or Loss on Sale of Capital Assets	\$5,072,323
71200+71300+71310+71400+71500	Other Income	\$2,066,951
70000	Total Revenue	\$160,181,582

#### ii. Estimated Uses of Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$15,931,045
91300+91310+92000	Management Fee Expense	\$8,178,479
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,207,653
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$5,094,990
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$17,221,884
95000 (95100+95200+95300+95500)	Total Protective Services	\$217,540
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,899,208



96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$2,807,193
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$556,277
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$103,978,140
97400	Depreciation Expense	\$9,388,720
97500+97600+97700+97800	All Other Expense	\$0
<b>9000</b>	<b>Total Expenses</b>	<b>\$166,481,129</b>

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

Total expenses are greater than sources -- FDS line item 97400, Depreciation is a non-cash expense which does not require a cash outlay.

Per Board Resolution 6032 dated June 4, 2020, SAHA Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

- 1) Section 8 funding shortfall - \$2.2 million
- 2) Public Housing funding shortfall - \$4.5 million
- 3) Program administration and implementation of MTW initiatives - \$1.4 million
- 4) Capital Planning - \$500 thousand
- 5) Additional Funding for East MEadows Public Improvements and Relocation - \$200 thousand
- 6) Expansion of Public Housing Wi-Fi - \$2 million
- 7) Highland Park property support - \$1 million
- 8) Preservation and expansion of affordable and public housing - \$15.1 million

**iii. Description of Planned Use of MTW Single Fund Flexibility**

*The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. 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 single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).*

**PLANNED USE OF MTW SINGLE FUND FLEXIBILITY**

The Community Development Initiative Department (CDI) uses staff resources and MTW funds to provide services designed to promote and support outreach and service coordination, resident engagement, and self sufficiency. In addition to administrative costs for a dedicated service department, the Agency also uses MTW funding for the following:

- Education Investment Foundation: SAHA's education-related programming is significant and diverse, and funding directly supports:
  - REACH Awards: recognize and reward students annually for academic achievement





- College Scholarship Program: funds scholarships for up to 50 students annually to provide much needed support to ensure higher educational achievement
- ConnectHome: SAHA has made it a priority to develop and implement digital inclusion strategies that address the digital divide. This priority is supported with MTW funds.
- Internship & Volunteer Program: Funding supports staff who are responsible for organizing community volunteers and integrating them into CDI services activities such as food distributions and wellness checks.
- Apprentice program: New program in development that is aimed to fund up to six in gaining job experience and marketable skills
- Early Engagement Program: Funding supports MTW activity 14-2- Early Engagement. See section 4 for more details.

## B. Local Asset Management Plan

- i. Is the MTW PHA allocating costs within statute? **Yes**
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)? **No**
- iii. Has the MTW PHA provided a LAMP in the appendix? **No**
- iv. If the MTW PHA has provided a LAMP in the appendix, 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. **N/A**

## C. Rental Demonstration (RAD) Participations

### i. 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

Given recent HUD guidance, the Agency is exploring the feasibility of participating in RAD.

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? **No**
- iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment? **N/A**



## Section VI. Administrative

(VI) ADMINISTRATIVE	
ANNUAL MTW PLAN	
<p><b>A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE</b></p> <p>The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.</p>	See Appendix B
<p><b>B. DOCUMENTATION OF PUBLIC PROCESS</b></p> <p>The beginning and end dates of when the Annual MTW Plan was made available for public review and the dates, location and number of attendees of public hearings must be provided. HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the Standard MTW Agreement (or successor MTW Agreement).</p>	See Appendix B
<p><b>C. PLANNED AND ONGOING EVALUATIONS</b></p> <p>The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).</p>	FY2015-1: MDRC / HUD Rent Study is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.
<p><b>D. LOBBYING DISCLOSURES</b></p> <p>The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).</p>	See Appendix B



## APPENDIX B: RESOLUTIONS AND CERTIFICATIONS

Appendix B is reserved for the Agency's resolutions, certifications, and other documentation requirements as required by HUD Form 50900: Elements of Annual MTW Plan.

The following will be provided upon submission to HUD.

1. Board Resolution and Certifications of Compliance
2. Public posting materials
3. Operations Committee materials
4. Public comment documentation
  - a. Public comment documentation
  - b. FY2022 MTW Plan Outreach Overview and Summary Report
5. Lobbying Disclosures
  - a. (SF-LLL)
  - b. (HUD-50071)



## **APPENDIX B.1.: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE**



## CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2021), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

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

San Antonio Housing Authority

TX006

**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).***

Ed Hinojosa, Jr.  
~~Ed Hinojosa, Jr.~~

**NAME OF AUTHORIZED OFFICIAL**

Interim President and CEO  
~~Interim President and CEO~~  
**TITLE**

**SIGNATURE**

**DATE**

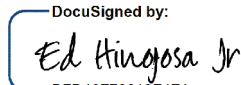
**\* Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or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

## SAN ANTONIO HOUSING AUTHORITY

May 6, 2021

## BOARD OF COMMISSIONERS

**RESOLUTION 6123, AUTHORIZING THE PROPOSED 2021-2022 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY PLAN (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

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**Ed Hinojosa, Jr.**  
 Interim President and CEO

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**Richard Milk**  
 Director of Policy and Planning

**REQUESTED ACTION:**

Public Hearing and consideration and approval regarding Resolution 6123, authorizing the proposed 2021-2022 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), the Five-Year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan.

**FINANCIAL IMPACT:**

Under SAHA's MTW Plan, Public Housing, Housing Choice Voucher Program, and Capital Fund resources are all combined into a single fund with full-funding flexibility. All MTW initiatives will continue to be funded from this single fund.

**SUMMARY:**

The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to annually submit a five-year plan and an annual business plan, commonly referred to as the Agency Plan(s). Due to SAHA's designation as a Moving-to-Work (MTW) agency, the MTW Plan serves as SAHA's Agency Plan. The MTW Plan includes: the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), and the Capital Fund Program Plan (CFP). The MTW Plan also describes SAHA's policies, programs, operations, strategies, and flexibilities in meeting the local housing needs and goals.

The 2021-2022 MTW Plan is an integral element of the agency's five-year Strategic Plan.

SAHA is on track to complete the 2021-2022 Agency Plan in time for April submission to HUD.

- I. **Proposed New MTW Activities:** The Agency is proposing one new MTW Activity that establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from a SAHA partner or contributions distributed to a household on behalf of a SAHA partner will not be included in the households annual income for purposes of calculating rent.

**SAN ANTONIO HOUSING AUTHORITY****May 6, 2021**

**II. Proposed Amendments to Existing Activities:** The Agency is not proposing any amendments to existing activities.

**III. Revisions to Housing Choice Voucher (HCV) Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP)**

- **3.3.C MANDATORY DENIAL OF ASSISTANCE**
  - This section adds language to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.
- **3.3.C MANDATORY DENIAL OF ASSISTANCE AND 16.3.B FAMILY DEBTS TO SAHA**
  - These sections add language to allow SAHA to set up repayment agreements with applicant families who owe debts to SAHA.
  - The reason for these changes is to make the Housing Choice Voucher (HCV) Program and Public Housing Program more accessible to applicant families.
- **9.3.C/11.2.C INTERIM REEXAMINATIONS**
  - Language was added for 9.3.C in the ACOP and 11.2.C in the Admin Plan to specify that SAHA will not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months.
  - This language is being added to align policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

**IV. Revisions to Housing Choice Voucher (HCV) ACOP Only**

- **3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION**
  - Language was removed that permitted SAHA to deny applicants based on one or more evictions for non-payment of rent within the past three years and a pattern of unsuitable past performance in meeting financial obligations. SAHA does not currently deny for those reasons and does not have the capability of screening for them.
  - SAHA wants to ensure that families have every opportunity to be admitted to the Public Housing Program and that any reasons for denial are fairly administered.
- **4.2.B ORGANIZATION OF THE WAITING LIST**
  - Beginning July 1, 2021, new Public Housing applicants will be added to a single, community-wide waiting list with all SAHA developments. Within that list, SAHA will designate subparts to easily identify who should be offered the next available unit (i.e., general occupancy developments, elderly/disabled developments, accessible units).
  - SAHA will maintain the current single, community-wide waiting list with preferred developments until exhausted.
- **4.3.B SELECTION METHOD**



**SAN ANTONIO HOUSING AUTHORITY****May 6, 2021**

- This section adds Marie McGuire to the list of available properties under the 80/20 Elderly Preference. The 80/20 Elderly Preference maintains a 4-to-1 elderly to non-elderly/disabled residents population at select properties.
- This section also removes the Time-Limited Working Household Referral Program Pilot preference and the Restorative Housing Pilot Program preference as the pilot programs and corresponding MTW activities are being closed out.
- A new preference has been added to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services, while residing in Victoria Plaza.
- 9.3.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION
  - Language was added to this section to establish a timeframe of 10 business days for move-out of live-in aides, when the Head of Household (sole family member) passes away.
- 9.3.C INTERIM REEXAMINATIONS
  - This section was updated to state that SAHA will not process increases in income under \$200.00 in earned and unearned monthly income, including new employment.
- 12.4.F TRANSFER PROCESSING
  - This section was updated to revert back to policy from 2017 and states that SAHA will not conduct an annual reexamination at transfer. This change will alleviate staff burden, which has increased since the policy was changed after 2017.
- 16.6.B RECORD RETENTION
  - Language was added to clarify that documents should be maintained in the file for at least three recertifications.

**V. Revisions to Housing Choice Voucher (HCV) Administrative Plan Only**

- 3.1.M LIVE-IN AIDE
  - Language was updated to specify that SAHA may approve a family to have more than one live-in aide, if it is determined to be a reasonable accommodation for a disability.
- 3.2.A INCOME AND ELIGIBILITY
  - Language was added to state that SAHA will be administering enhanced vouchers.
  - Enhanced vouchers provide certain tenant protections for low-income families who reside in private properties that are converting from HUD rental assistance programs.
- 3.3.D OTHER PERMITTED REASONS FOR DENIAL
  - Language was updated to clarify that SAHA will deny assistance for previous terminations (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.
  - This aligns with policy in place for SAHA's Public Housing Program. The reason for this change is to make the HCV Program more accessible to our applicant families.
- 5.2.B DETERMINING FAMILY UNIT (VOUCHER) SIZE

**SAN ANTONIO HOUSING AUTHORITY****May 6, 2021**

- Language was added to 5.2.B(4) to specify situations where anticipated children will be counted in the family voucher size; pregnancy will be counted upon submission of supporting documentation and adoptions will be counted after proof that the adoption is complete or awarded.
- **8.1.B ADDITIONAL LOCAL REQUIREMENTS**
  - Language was added to this section from previous policy (Admin Plan FY17-18) to revert to allowing landlords an option to obtain verification of additional bedrooms through Bexar County Appraisal District (BCAD) or a licensed professional, versus requiring authorization only through BCAD.
- **8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT**
  - Language was updated to reflect current practice that SAHA posts inspection results for the owner electronically to the Landlord Portal.
- **16.3.B INFORMAL REVIEWS**
  - Language was added to 16.3.B(3)(c) to state that SAHA will provide an informal review upon the denial of a voucher term extension or suspension.
  - Even if SAHA is not required to by HUD to provide a review under this circumstance [24 CFR 982.555], permitting these informal reviews has often resulted in overturns and additional chances for the family.
- **18.6.C ORGANIZATION OF THE WAITING LIST**
  - Language was updated to establish a single waiting list for the Project-Based Voucher (PBV) Program. While SAHA currently administers separate waiting lists for each PBV development, the consolidation will streamline waitlist management and reduce applicant wait times.
- **18.6.D SELECTION FROM THE WAITING LIST**
  - Language was removed from this section to clarify that the St. Philip's College Homeless Program is not being administered as a PBV program.
- **19.3.A SELECTION FROM THE WAITING LIST**
  - Language was added to allow SAHA to assist Moderate Rehabilitation (Mod-Rehab) partners in converting to Rental Assistance Demonstration (RAD) if they express interest to SAHA.

**VI. Family Self-Sufficiency (FSS) Action Plan**

- The agency has developed a comprehensive FSS Action Plan that includes regulatory requirements and SAHA policy to cover all areas of the FSS Program.
- The proposed FY21-22 FSS Action Plan does not include substantive changes to the policy or procedures of the FSS Program, and instead allows SAHA to incorporate additional public input by including it within the MTW Plan.
- The proposed language of the FSS Action Plan complies with federal regulations and HUD recommendations, while also encouraging residents, community partners and the public to participate in the policymaking process.

**VII. Capital Fund Program (CFP): General description of all planned Capital Fund Expenditures during the plan year****Housing Preservation Plans:**

**SAN ANTONIO HOUSING AUTHORITY****May 6, 2021**

Public Housing: Over the next five (5) years, the Agency plans to invest approximately \$17,000,000.00 in capital repairs to extend the useful life at 26 properties and approximately 2,253 housing units.

Beacon Communities: In the coming years, the Agency plans to invest approximately \$26,000,000.00 in capital repairs to extend the useful life at 21 properties and approximately 2,901 units in the Beacon Communities portfolio.

**Housing Expansion Plans:**

New Construction: The agency is pursuing more than \$1,000,000,000.00 in prospective housing developments to add approximately 6,000 units to the rental market in the next five (5) years.

**MTW TIMELINE**

February: Draft MTW Plan posted for public comment

March: Public Hearing scheduled during Operations and Choice Neighborhood Committee Meeting

April: Consideration and appropriate action by Board of Commissioners and submission to HUD

May-June: Address HUD questions

July 1: Initiate implementation of the MTW Plan

**STRATEGIC OUTCOME:**

SAHA residents have a sufficient supply of affordable housing options.

**ATTACHMENTS:**

Resolution 6123  
MTW Plan Presentation  
Public Comment Summary Presentation

**San Antonio Housing Authority  
Resolution 6123**

**RESOLUTION 6123, AUTHORIZING THE PROPOSED 2021-2022 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

**WHEREAS**, the Board of Commissioners of the San Antonio Housing Authority, a public instrumentality created pursuant to the laws of the State of Texas ("SAHA") must approve the 2021-2022 Moving to Work (MTW) Agency Plan for fiscal year 2021-2022, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program, and the Family Self-Sufficiency (FSS) Program Action plan; and

**WHEREAS**, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2021-2022 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

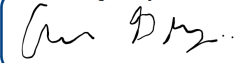
**WHEREAS**, the Board further desires to authorize the Chairman and the Interim President and CEO to execute and submit to HUD such certifications and other documents that they deem necessary or advisable in connection with the submission of the MTW Agency Plan.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of SAHA hereby:

- 1) Approves Resolution 6123, authorizing the proposed 2021-2022 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), the Capital Fund Program Plan (CFP), five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan; and
- 2) Authorizes the Chair and Interim President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2021-2022 MTW Plan to HUD.

**Passed and approved the 6th day of May 2021.**

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**Ana M. "Cha" Guzman**

**Chair, Board of Commissioners**

**Attested and approved as to form:**

DocuSigned by:



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**Ed Hinojosa, Jr.**

**Interim President and CEO**

## APPENDIX B.2.: PUBLIC POSTING MATERIALS

### FY2022 MTW PLAN

#### SAHA 2025: Impact & Innovation Plan

The Agency anticipates posting the strategic plan in the coming weeks.

For purposes of ensuring continued program administration under the Moving to Work demonstration, the Agency is posting this year's FY2021–2022 MTW Plan (appendix to the strategic plan) on February 23, 2021.

The Annual MTW Plan describes the Agency's planned use of its Moving to Work flexibilities including MTW waiver requests and other required MTW information that will support the Agency's annual strategic implementation plan.

#### Appendix A: HUD Information Reporting Requirements (FY2022 MTW PLAN)

Appendix A contains the Agency's Annual MTW Plan as required by HUD Form 50900: Elements of Annual MTW Plan.

- The Agency is proposing **one new activity**

#### Appendix C: Proposed Housing Program Implementation Policy Changes

Appendix C contains proposed changes to the Agency's implementation policies for the Public Housing Program and Assisted Housing Programs.

*Public Housing | FY2021-2022 Admissions & Continued Occupancy Policy*

- **Revision Summary**
- **Policy Changes Explained**

*Housing Choice Voucher (Section 8) | FY2021-2022 Administrative Plan*

- **Revision Summary**
- **Policy Changes Explained**

#### Appendix D: Proposed Family Self-Sufficiency (FSS) Program Action Plan

Appendix D contains the Agency's implementation policies for the Family Self-Sufficiency Program.

- **Revision Summary**

#### Appendix E: Asset Management Plan

Appendix E contains the Asset Management Plan which outlines how the Agency plans to make best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy and supporting the Agency's 2025 Strategic Plan.

#### Appendix B, F:

**Resolutions & Certifications:** Appendix B is reserved for the Agency's resolutions, certifications, and other documentation requirements as required by HUD Form 50900: Elements of Annual MTW Plan.

**Appendix F: Third-Party Lease Agreements** Appendix F is reserved for documentation associated with PIH 2017-24.



# ¡Queremos escuchar de usted!

Nos gustaría conocer su opinión sobre los cambios en el programa y las políticas que SAHA propone mandara a HUD para aprobación. Sus comentarios nos ayudarán a saber si estamos en el camino correcto.

Tenga en cuenta que esta es una encuesta anónima y voluntaria. No afectará su participación en los programas de SAHA.

Si tiene alguna pregunta o inquietud, envíela a [MTW@saha.org](mailto:MTW@saha.org).

\* Required

1. 1. Por favor seleccione la opción que mejor lo describa. Marque sólo un ovalo \*

*Mark only one oval.*

- ☐ Residente de Vivienda Pública *Skip to question 2*
- ☐ Participante en Sección 8 (Housing Choice Voucher) (Esto incluye los programas - Housing Choice Voucher Program (this includes HUD-VASH, Set Aside Homeless Voucher (SHVP) Program, Moderate Rehabilitation (MOD-REHAB) Program, Mainstream Program) *Skip to question 9*
- ☐ Other: \_\_\_\_\_

Cambios  
Propuestos al  
ACOP (Vivienda  
Pública)

SAHA propone cambios a la Política de Admisiones y Ocupación Continua (ACOP). El ACOP se aplica únicamente a los residentes/solicitantes de Vivienda Pública.

Para cada una de las siguientes preguntas, por favor indique cuánto apoya o cuánto se opone a esa propuesta. Si no sabe o no tiene una opinión al respecto, favor de marcar el "3."

2. La política actual establece que SAHA denegará a los solicitantes si han sido desalojados en los últimos 5 años de una vivienda con ayuda federal por actividad criminal relacionada con drogas. En vez de eso, SAHA propone examinar a estos solicitantes usando el criterio que tiene SAHA, que usa diferentes tiempos dependiendo de la severidad del crimen (períodos más largos para crímenes más severos y períodos más cortos para crímenes menos severos). El criterio se puede ubicar en la Sección 3.3.E del Plan ACOP (pág. 3-38).

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3. SAHA propone eliminar el poder escoger las preferencias de Vivienda Pública al hacer su solicitud para reducir los tiempos de espera del solicitante y para optimizar la administración de la lista de espera.

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4. SAHA propone poner en práctica una proporción de 4-a-1 residente anciano a no anciano discapacitado en Marie McGuire.

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5. 5. SAHA propone poner en práctica una preferencia que le permita al Centro de Servicios de Salud, (Center for Health Care Services, CHCS,) un socio de SAHA, que refiera a las familias discapacitadas para que reciban servicios de apoyo mientras estén viviendo en Victoria Plaza.

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6. 6. SAHA propone establecer un marco de tiempo de 10 días para que haga su mudanza de salida el asistente de atención médica que viva ahí si fallece la única persona en el hogar que recibe la asistencia.

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7. 7. SAHA propone no disminuir el ingreso de los pagos de manutención de menores ni el de un empleo temporal hasta que se haya disminuido tres meses consecutivos, ya que estos pagos frecuentemente cambian. La disminución se aplicaría retroactivamente al primero del mes después de la fecha en que originalmente se reportó.

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8. 8. SAHA propone permitirle al solicitante llegar a un acuerdo de repago por deudas anteriores con SAHA.

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Skip to question 16

**Cambios Propuestos  
en el Plan  
Administrativo(Sección  
8 HCV)**

SAHA está proponiendo cambios al Plan Administrativo del Programa Voucher. El Plan Administrativo se aplica únicamente al Programa Housing Choice Voucher (HCV) (Sección 8).

Para cada una de las siguientes preguntas, por favor indique cuánto apoya o cuánto se opone a esa propuesta. Si no sabe o no tiene una opinión al respecto, favor de marcar el "3."

9. 9. SAHA propone establecer vales (vouchers) con protecciones adicionales para el inquilino para los hogares de riesgo identificados a través de los socios de SAHA.

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10. 10. SAHA propone no disminuir el ingreso de los pagos de manutención de menores ni el de un empleo temporal hasta que se haya disminuido tres meses consecutivos, ya que estos pagos frecuentemente cambian. La disminución se aplicaría retroactivamente al primero del mes después de la fecha en que originalmente se reportó.

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11. 11. SAHA propone requerir la documentación de apoyo antes de actualizar el vale (voucher) del tamaño de familia en casos de embarazo y adopción.

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12. 12. La política actual establece que SAHA denegará a los solicitantes si han sido desalojados en los últimos 5 años de una vivienda con ayuda federal por actividad criminal relacionada con drogas. En vez de eso, SAHA propone examinar a estos solicitantes usando el criterio que tiene SAHA, que usa diferentes tiempos dependiendo de la severidad del crimen (períodos más largos para crímenes más severos y períodos más cortos para crímenes menos severos). El criterio se puede ubicar en la Sección 3.3.E del Plan Administrativo (pág. 3-32).

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13. 13. SAHA propone negar la asistencia por terminación anterior (no relacionada con actividades criminales relacionadas con drogas) por tres años antes de seleccionarlo de la lista de espera, en vez de cinco años antes.

*Mark only one oval.*

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14. 14. SAHA propone permitirle al solicitante llegar a un acuerdo de repago por deudas anteriores con SAHA.

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15. 15. SAHA propone establecer una sola lista de espera para todo el programa de Vales Basado en Proyectos (Project-Based Voucher, PBV), en vez de listas de espera separadas por urbanización, para reducir los tiempos de espera del solicitante y para optimizar la administración de la lista de espera.

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Skip to question 16

Plan de Acción del  
Programa de  
Autosuficiencia  
Familiar (FSS)

Para cada una de las siguientes preguntas, por favor indique cuánto apoya o cuánto se opone a esa propuesta. Si no sabe o no tiene una opinión al respecto, favor de marcar el "3."

16. 16. Por favor seleccione la opción que mejor lo describa. Marque sólo un ovalo

Mark only one oval.

- ☐ Actualmente inscrito en el programa FSS
- ☐ Anteriormente en o termine el Programa FSS
- ☐ Nunca inscrito en el programa FSS
- ☐ No estoy seguro
- ☐ No aplica o no es un cliente SAHA.

17. 17. SAHA propone incluir el Plan de Acción de Autosuficiencia Familiar (FSS) dentro del Plan de Impulso Hacia el Trabajo (MTW). Si se aprueba, se invitaría al público a comentar en cualquier cambio de política en el Plan de Acción del FSS.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

18. 18. Actualmente las políticas no hacen diferencia entre lo que son las políticas de FSS según los reglamentos federales, las políticas de SAHA y/o las flexibilidades del MTW. SAHA propone cambiar el formato del Plan de Acción de FSS para mostrar cuáles políticas son determinadas por SAHA y cuales son requeridas por ley.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

19. 19. El Plan de Acción de Autosuficiencia Familiar (FSS) explica el Programa y su objetivo de ayudar a las familias de la SAHA a alcanzar la autosuficiencia. SAHA no propone cambios en este objetivo, sino que agradece sus comentarios sobre el programa FSS. El Programa FSS está abierto a familias en Vivienda Pública y Programa Housing Choice Voucher (HCV) (Sección 8). Los trabajadores sociales de FSS ofrecen ofrecen servicios y otra ayuda a las familias que eligen estar en el Programa de FSS.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

20. 20. SAHA propone establecer un Comité Coordinador del Programa (PCC) como lo requiere la ley federal. Este PCC ayudaría a SAHA a asegurar los compromisos de los recursos públicos y privados para las operaciones del Programa FSS.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

21. 21. El Plan de Acción FSS incluye los “Servicios de Incentivo de SAHA para la Red de Participación”, que es una descripción detallada de los incentivos que ofrece SAHA a las familias elegibles para motivar la participación en el Programa FSS. Los incentivos incluyen, entre otros, una cuenta de garantía (escrow account) que es una cuenta que produce intereses que las familias pueden acumular como resultado de algún aumento en sus sueldos. SAHA no propone cambios en los incentivos, sino que agradece sus comentarios sobre los servicios de incentivos para el Programa FSS.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

22. 22. SAHA propone un enfoque de “Doble Generación” para la participación del Programa FSS, que le permita a cualquier miembro de un hogar con FSS el crear su propio Plan Individual de Servicios y Entrenamiento (ITAP), que muestre sus propias necesidades individuales. Este ITAP también identificará los servicios de apoyo correspondientes para que el individuo también pueda recibir los servicios de un trabajador social para lograr sus propias metas.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

23. 23. Cuando SAHA tome alguna acción adversa en contra de alguna familia, el Plan de Acción FSS establece que SAHA utilizará las políticas y el procedimiento de quejas para el programa de vivienda respectivo de la familia con FSS [Vivienda Pública o Vales de Elección de Vivienda (HCV)]. Las familias con FSS en HCV usarán los procedimientos de audiencias y revisión informal como se establece en el Plan Administrativo, y las familias con FSS en Vivienda Pública usarán los procedimientos de audiencias y conferencias informales descritos en el ACOP y Contrato de Arrendamiento. SAHA no está proponiendo cambios a esta política, pero agradece sus comentarios sobre los procedimientos de quejas en el Programa FSS.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

24. 24.SAHA propone proporcionar a todas las familias en el Programa FSS un estado de cuenta anual que muestre el saldo y la condición de sus cuentas de garantía.

*Mark only one oval.*

	1	2	3	4	5	
Me opongo fuertemente	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Lo apoyo fuertemente

25. 25. ¿Cuánto está de acuerdo con la siguiente declaración: Los cambios en el programa FSS han aumentado mi interés en unirme al programa FSS. Si la pregunta no se aplica o usted no es un cliente SAHA, marque la opción 3.

*Mark only one oval.*

- ☐ Fuertemente en desacuerdo
- ☐ Fuertemente en acuerdo

*Skip to section 5 (¡Gracias!)*

¡Gracias!

Gracias por proporcionar sus comentarios. Reuniremos las respuestas de todos y las tomaremos en cuenta a medida que terminemos el plan que presentaremos a HUD.

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# We want to hear from you!

Please provide your feedback on the policy changes we will be submitting to the U.S. Department of Housing and Urban Development (HUD) for approval. Your feedback will help us know if we're on the right track.

Please know, this is an anonymous and voluntary survey. It will not affect your application status or participation in any SAHA programs.

If you have any questions or concerns, please send them to [MTW@saha.org](mailto:MTW@saha.org).

**\* Required**

1. 1. What SAHA program are you in? \*

*Mark only one oval.*

- ☐ Low Income Public Housing      *Skip to question 2*
- ☐ Housing Choice Voucher Program- Section 8 (this includes HUD-VASH, Set Aside Homeless Voucher (SHVP) Program, Moderate Rehabilitation (MOD-REHAB) Program, Mainstream Program)      *Skip to question 9*
- ☐ Other: \_\_\_\_\_

## Section A: Public Housing Policy Changes in the Admissions and Continued Occupancy Plan (ACOP)

SAHA is proposing changes to the Admissions and Continued Occupancy Policy (ACOP). The ACOP applies to Public Housing residents/applicants only.

For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "3."



2. 2. Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the ACOP Plan (pg 3-38).

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

3. 3. SAHA proposes to eliminate the ability to choose preferred Public Housing developments at the time of application in order to reduce applicant wait times and streamline waitlist management.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

4. 4. SAHA proposes to implement a 4-to-1 ratio of elderly to non-elderly disabled residents at Marie McGuire.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

5. 5: SAHA proposes to implement a preference to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services while residing in Victoria Plaza.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

6. 6: SAHA proposes to establish a 10-business-day timeframe for move-out of live-in aides if the sole household member receiving housing assistance passes away.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

7. 7: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

8. 8: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.

Mark only one oval.

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

Skip to question 16

### Section B: Housing Choice Voucher Policy Changes in the Administrative Plan

SAHA is proposing changes to the Housing Choice Voucher Administrative Plan. The Administrative Plan applies to Assisted Housing Programs (AHP) (such as Section 8) only.

For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "3."

9. 9: SAHA proposes to administer vouchers with additional tenant protections for at-risk households identified through SAHA partners.

Mark only one oval.

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

10. 10: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.

Mark only one oval.

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

11. 11: SAHA proposes to require supporting documentation prior to updating family voucher size in the cases of pregnancy and adoption.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

12. 12: Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the Admin Plan (pg 3-32).

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

13. 13: SAHA proposes to deny assistance for previous termination (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

14. 14: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

15. 15: SAHA proposes to establish a single waiting list for SAHA's entire Project-Based Voucher (PBV) Program, rather than separate waiting lists per development, in order to reduce applicant wait time and streamline waitlist management.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

*Skip to question 16*

**Section C:  
Policy  
Changes  
in the  
Family  
Self-  
Sufficiency  
(FSS)  
Action  
Plan**

The purpose of the Family Self-Sufficiency (FSS) Action Plan is to establish policies for carrying out the Family Self-Sufficiency (FSS) Program. The purpose of the FSS Program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The FSS Program is an optional case management program open to families in Public Housing and the Housing Choice Voucher program.

16. 16: Please select the option that best describes you. \*

*Mark only one oval.*

- ☐ Currently in the FSS Program.
- ☐ Previously in or finished the FSS Program.
- ☐ Never in the FSS Program.
- ☐ Not sure.
- ☐ Not applicable or not a SAHA client.

17. 17: SAHA proposes making the Family Self-Sufficiency (FSS) Action Plan part of SAHA's annual Moving To Work (MTW) Plan. If SAHA makes this change, then moving forward, the public would be invited to comment on any policy changes to the FSS Action Plan.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

18. 18: Current policy does not show whether an FSS rule is required by federal law or by SAHA policy. SAHA proposes changing the FSS Action Plan to show which policies are required by law, and which are written by SAHA.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

19. 19: The FSS Action Plan explains the FSS Program and its goal of helping SAHA families achieve self-sufficiency. SAHA is not proposing changes to this goal, but asks for feedback on the FSS Program as a whole. The FSS Program is open to families in Public Housing and the Housing Choice Voucher program. FSS case managers offer services and other help to families who choose to be in the FSS Program.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

20. 20: SAHA proposes establishing a Program Coordinating Committee (PCC) as required by federal law. The PCC would help SAHA improve the FSS Program by increasing resources and support for FSS families.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Approve

21. 21: The FSS Action Plan includes the “SAHA Incentive Services for Participation Grid,” which explains the services SAHA can give to families who take part in the FSS Program. Services include, among many others, an escrow account of money that increases over time. Families can build savings in this account by earning higher wages from work, and can receive a large payment when they finish the FSS Program. SAHA is not proposing changes, but asks for feedback on the FSS Program's incentive services.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

22. 22: SAHA proposes a “Dual Generation” approach to its FSS Program, which would encourage more family members to participate in FSS. This change would allow more than one person in an FSS family to create an Individual Training and Services Plan (ITSP.) The ITSP shows what services and support are needed to be successful and complete the FSS Program. An FSS case manager can then work with the person to receive individual support and achieve their own ITSP goals.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support



23. 23: The FSS Action Plan says that SAHA will use its grievance policies when taking action against a family enrolled in the FSS Program. The ACOP and Public Housing Lease explains the informal conference and hearing policies for FSS families in Public Housing. The Administrative Plan explains the informal review and hearing policies for FSS families in the Housing Choice Voucher (HCV) program. SAHA is not proposing changes, but invites feedback on using grievance policies for the FSS Program.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Support

24. 24: SAHA proposes sending all FSS Program families a letter each year that shows the amount of money in their escrow account.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Oppose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Approve

25. 25: How much do you agree with the following statement: "The proposed changes to FSS Program increased my interest in joining the FSS Program"? If the question does not apply or you are not a SAHA client, please mark option 3.

*Mark only one oval.*

	1	2	3	4	5	
Strongly Disagree	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Strongly Agree

*Skip to section 5 (Thank you!)*

**Thank  
you!**

Thank you for providing your feedback. We will gather everyone's responses and take them all into consideration as we finalize the plan we will submit to HUD.

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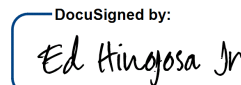
## APPENDIX B.3.: OPERATIONS COMMITTEE MATERIALS



**SAN ANTONIO HOUSING AUTHORITY****March 18, 2021**

**BOARD OF COMMISSIONERS**  
**Operations and Choice Neighborhood Committee**

**RESOLUTION 6123, AUTHORIZING THE PROPOSED 2021-2022 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY PLAN (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

DocuSigned by:  
  
 D7D46E73613E4FA...  
**Ed Hinojosa, Jr.**  
 Interim President and CEO

DocuSigned by:  
  
 051262290293493...  
**Richard Milk**  
 Director of Policy and Planning

**REQUESTED ACTION:**

Hold a Public Hearing and consideration and appropriate action regarding Resolution 6123, authorizing the proposed 2021-2022 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), the Five-Year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan.

**FINANCIAL IMPACT:**

Under SAHA's MTW Plan, Public Housing, Housing Choice Voucher Program, and Capital Fund resources are all combined into a single fund with full-funding flexibility. All MTW initiatives will continue to be funded from this single fund.

**SUMMARY:**

The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to annually submit a five-year plan and an annual business plan, commonly referred to as the Agency Plan(s). Due to SAHA's designation as a Moving-to-Work (MTW) agency, the MTW Plan serves as SAHA's Agency Plan. The MTW Plan includes: the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), and the Capital Fund Program Plan (CFP). The MTW Plan also describes SAHA's policies, programs, operations, strategies, and flexibilities in meeting the local housing needs and goals.

The 2021-2022 MTW Plan is an integral element of the agency's five-year Strategic Plan.

SAHA is on track to complete the 2021-2022 Agency Plan in time for April submission to HUD.

- I. **Proposed New MTW Activities:** The Agency is proposing one new MTW Activity that establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from a SAHA partner or contributions distributed to a household on behalf of a SAHA partner will not be included in the households annual income for purposes of calculating rent.

**SAN ANTONIO HOUSING AUTHORITY****March 18, 2021**

**II. Proposed Amendments to Existing Activities:** The Agency is not proposing any amendments to existing activities.

**III. Revisions to Housing Choice Voucher (HCV) Administrative Plan and Public Housing Admissions and Continued Occupancy Policy (ACOP)**

- **3.3.C MANDATORY DENIAL OF ASSISTANCE**
  - This section adds language to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.
- **3.3.C MANDATORY DENIAL OF ASSISTANCE AND 16.3.B FAMILY DEBTS TO SAHA**
  - These sections add language to allow SAHA to set up repayment agreements with applicant families who owe debts to SAHA.
  - The reason for these changes is to make the Housing Choice Voucher (HCV) Program and Public Housing Program more accessible to applicant families.
- **9.3.C/11.2.C INTERIM REEXAMINATIONS**
  - Language was added for 9.3.C in the ACOP and 11.2.C in the Admin Plan to specify that SAHA will not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months.
  - This language is being added to align policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

**IV. Revisions to Housing Choice Voucher (HCV) ACOP Only**

- **3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION**
  - Language was removed that permitted SAHA to deny applicants based on one or more evictions for non-payment of rent within the past three years and a pattern of unsuitable past performance in meeting financial obligations. SAHA does not currently deny for those reasons and does not have the capability of screening for them.
  - SAHA wants to ensure that families have every opportunity to be admitted to the Public Housing Program and that any reasons for denial are fairly administered.
- **4.2.B ORGANIZATION OF THE WAITING LIST**
  - Beginning July 1, 2021, new Public Housing applicants will be added to a single, community-wide waiting list with all SAHA developments. Within that list, SAHA will designate subparts to easily identify who should be offered the next available unit (i.e., general occupancy developments, elderly/disabled developments, accessible units).
  - SAHA will maintain the current single, community-wide waiting list with preferred developments until exhausted.
- **4.3.B SELECTION METHOD**

**SAN ANTONIO HOUSING AUTHORITY****March 18, 2021**

- This section adds Marie McGuire to the list of available properties under the 80/20 Elderly Preference. The 80/20 Elderly Preference maintains a 4-to-1 elderly to non-elderly/disabled residents population at select properties.
- This section also removes the Time-Limited Working Household Referral Program Pilot preference and the Restorative Housing Pilot Program preference as the pilot programs and corresponding MTW activities are being closed out.
- A new preference has been added to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services, while residing in Victoria Plaza.
- 9.3.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION
  - Language was added to this section to establish a timeframe of 10 business days for move-out of live-in aides, when the Head of Household (sole family member) passes away.
- 9.3.C INTERIM REEXAMINATIONS
  - This section was updated to state that SAHA will not process increases in income over \$200.00 in earned and unearned monthly income, including new employment.
- 12.4.F TRANSFER PROCESSING
  - This section was updated to revert back to policy from 2017 and states that SAHA will not conduct an annual reexamination at transfer. This change will alleviate staff burden, which has increased since the policy was changed after 2017.
- 16.6.B RECORD RETENTION
  - Language was added to clarify that documents should be maintained in the file for at least three recertifications.

**V. Revisions to Housing Choice Voucher (HCV) Administrative Plan Only**

- 3.1.M LIVE-IN AIDE
  - Language was updated to specify that SAHA may approve a family to have more than one live-in aide, if it is determined to be a reasonable accommodation for a disability.
- 3.2.A INCOME AND ELIGIBILITY
  - Language was added to state that SAHA will be administering enhanced vouchers.
  - Enhanced vouchers provide certain tenant protections for low-income families who reside in private properties that are converting from HUD rental assistance programs.
- 3.3.D OTHER PERMITTED REASONS FOR DENIAL
  - Language was updated to clarify that SAHA will deny assistance for previous terminations (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.
  - This aligns with policy in place for SAHA's Public Housing Program. The reason for this change is to make the HCV Program more accessible to our applicant families.
- 5.2.B DETERMINING FAMILY UNIT (VOUCHER) SIZE

**SAN ANTONIO HOUSING AUTHORITY****March 18, 2021**

- Language was added to 5.2.B(4) to specify situations where anticipated children will be counted in the family voucher size; pregnancy will be counted upon submission of supporting documentation and adoptions will be counted after proof that the adoption is complete or awarded.
- **8.1.B ADDITIONAL LOCAL REQUIREMENTS**
  - Language was added to this section from previous policy (Admin Plan FY17-18) to revert to allowing landlords an option to obtain verification of additional bedrooms through Bexar County Appraisal District (BCAD) or a licensed professional, versus requiring authorization only through BCAD.
- **8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT**
  - Language was updated to reflect current practice that SAHA posts inspection results for the owner electronically to the Landlord Portal.
- **16.3.B INFORMAL REVIEWS**
  - Language was added to 16.3.B(3)(c) to state that SAHA will provide an informal review upon the denial of a voucher term extension or suspension.
  - Even if SAHA is not required to by HUD to provide a review under this circumstance [24 CFR 982.555], permitting these informal reviews has often resulted in overturns and additional chances for the family.
- **18.6.C ORGANIZATION OF THE WAITING LIST**
  - Language was updated to establish a single waiting list for the Project-Based Voucher (PBV) Program. While SAHA currently administers separate waiting lists for each PBV development, the consolidation will streamline waitlist management and reduce applicant wait times.
- **18.6.D SELECTION FROM THE WAITING LIST**
  - Language was removed from this section to clarify that the St. Philip's College Homeless Program is not being administered as a PBV program.
- **19.3.A SELECTION FROM THE WAITING LIST**
  - Language was added to allow SAHA to assist Moderate Rehabilitation (Mod-Rehab) partners in converting to Rental Assistance Demonstration (RAD) if they express interest to SAHA.

**VI. Family Self-Sufficiency (FSS) Action Plan**

- The agency has developed a comprehensive FSS Action Plan that includes regulatory requirements and SAHA policy to cover all areas of the FSS program.

**VII. Capital Fund Program (CFP): General description of all planned Capital Fund Expenditures during the plan year****Housing Preservation Plans:**

Public Housing: Over the next five (5) years, the Agency plans to invest approximately \$17,000,000.00 in capital repairs to extend the useful life at 26 properties and approximately 2,253 housing units.

Beacon Communities: In the coming years, the Agency plans to invest approximately \$26,000,000.00 in capital repairs to extend the useful life at 21 properties and approximately 2,901 units in the Beacon Communities portfolio.

**SAN ANTONIO HOUSING AUTHORITY**

**March 18, 2021**

**Housing Expansion Plans:**

New Construction: The agency is pursuing more than \$1,000,000,000.00 in prospective housing developments to add approximately 6,000 units to the rental market in the next five (5) years.

**MTW TIMELINE**

February: Draft MTW Plan posted for public comment

March: Public Hearing scheduled during Operations and Choice Neighborhood Committee Meeting

April: Consideration and appropriate action by Board of Commissioners and submission to HUD

May-June: Address HUD questions

July 1: Initiate implementation of the MTW Plan

**STRATEGIC OUTCOME:**

SAHA residents have a sufficient supply of affordable housing options.

**ATTACHMENTS:**

Resolution 6123  
Presentation



**San Antonio Housing Authority  
Resolution 6123**

**RESOLUTION 6123, AUTHORIZING THE PROPOSED 2021-2022 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

**WHEREAS**, the Board of Commissioners of the San Antonio Housing Authority, a public instrumentality created pursuant to the laws of the State of Texas (“SAHA”) must approve the 2021-2022 Moving to Work (MTW) Agency Plan for fiscal year 2021-2022, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program, and the Family Self-Sufficiency (FSS) Program Action plan; and

**WHEREAS**, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2021-2022 MTW Agency Plan to the U.S. Department of Housing and Urban Development (“HUD”); and

**WHEREAS**, the Board further desires to authorize the Chairman and the Interim President and CEO to execute and submit to HUD such certifications and other documents that they deem necessary or advisable in connection with the submission of the MTW Agency Plan.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of SAHA hereby:

- 1) Approves Resolution 6123, authorizing the proposed 2021-2022 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), the Capital Fund Program Plan (CFP), five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan; and
- 2) Authorizes the Chair and Interim President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2021-2022 MTW Plan to HUD.

**Passed and approved the 1st day of April 2021.**

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**Ana M. “Cha” Guzman**  
**Chair, Board of Commissioners**

**Attested and approved as to form:**

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**Ed Hinojosa, Jr.**  
**Interim President and CEO**



# DRAFT MTW PLAN 2022

Operations and Choice Neighborhood Committee

March 18, 2021

# TODAY

2

## 2025: Five-Year Outcomes

- Strategic Plan Outcomes
- Asset Plan and CFP Plan

## 2022: Implementation Plans

- MTW Plan
- ACOP and Admin Plan
- FSS Action Plan

# MTW PLAN TIMELINE

3

- **February:** Draft MTW Plan posted for public comment
- **March:** Public Hearing scheduled during Operations and Choice Neighborhood Committee Meeting
- **April:** Consideration and appropriate action by Board of Commissioners and submission to HUD
- **May-June:** Address HUD questions
- **July 1:** Initiate implementation of the MTW Plan

# ASSET MANAGEMENT PLAN AND CFP

4

## 1. Proposed Housing Preservation Plans

- a. Public Housing: Over next 5 years, plan to invest \$17 million in capital repairs to extend the useful life at 26 properties and approximately 2,253 housing units.
- b. Beacon Communities: Plans to invest approximately \$26 million in capital repairs to extend the useful life at 21 properties and approximately 2,901 units.

## 2. Proposed Housing Expansion Plans

- a. New Construction: Agency has 2,390 units in the construction pipeline.
- b. Other projects in the early planning and pre-development phase could add nearly 3,700 units in the coming five years.

# MTW PLAN

5

## No Proposed Changes to Existing MTW Activities and One Proposed New MTW Activity

### FY2022-1: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions

Establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from a SAHA partner or contributions distributed to a household on behalf of a SAHA partner will not be included in the household's annual income for purposes of eligibility and calculating rent.

Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners. Examples include: (i) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (ii) cash or other liquid assets, and (iii) "in-kind" contributions, such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.

# PROPOSED ACOP CHANGES

6

## 3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

- Language was removed that permitted SAHA to deny applicants based on one or more evictions for non-payment of rent within the past three years and a pattern of unsuitable past performance in meeting financial obligations. SAHA does not currently deny for those reasons and does not have the capability of screening for them.
- SAHA wants to ensure that families have every opportunity to be admitted to the Public Housing Program and that any reasons for denial are fairly administered.

# PROPOSED ACOP CHANGES

7

## 4.2.B ORGANIZATION OF THE WAITING LIST

- Beginning July 1, 2021, new Public Housing applicants will be added to a single, community-wide waiting list with all SAHA developments. Within that list, SAHA will designate subparts to easily identify who should be offered the next available unit (i.e., general occupancy developments, elderly/disabled developments, accessible units).
- SAHA will maintain the current single, community-wide waiting list with preferred developments until exhausted.



# PROPOSED ACOP CHANGES

8

## 4.3.B SELECTION METHOD

- This section adds Marie McGuire to the list of available properties under the 80/20 Elderly Preference. The 80/20 Elderly Preference maintains a 4-to-1 elderly to non-elderly disabled residents population at select properties.
- This section also removes the Time-Limited Working Household Referral Program Pilot preference and the Restorative Housing Pilot Program preference as the pilot programs and corresponding MTW activities are being closed out.
- A new preference has been added to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services ,while residing in Victoria Plaza.

# PROPOSED ACOP CHANGES

9

## 9.3.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

- Language was added to this section to establish a timeframe of 10 business days for move-out of live-in aides when the Head of Household (sole family member) passes away.

# PROPOSED ACOP CHANGES

10

## 9.3.C INTERIM REEXAMINATIONS

- This section was updated to state that SAHA will not process increases in income over \$200.00 in earned and unearned monthly income, including new employment.

# PROPOSED ACOP CHANGES

11

## 12.4.F TRANSFER PROCESSING

- This section was updated to revert back to policy from 2017 and states that SAHA will not conduct an annual reexamination at transfer. This change will alleviate staff burden, which has increased since the policy was changed after 2017.

# PROPOSED ACOP CHANGES

12

## 16.6.B RECORD RETENTION

- Language was added to clarify that documents should be maintained in the file for at least three recertifications.

# PROPOSED ADMIN PLAN CHANGES

13

## 3.1.M LIVE-IN AIDE

- Language was updated to specify that SAHA may approve a family to have more than one live-in aide, if it is determined to be a reasonable accommodation for a disability.

# PROPOSED ADMIN PLAN CHANGES

14

## 3.2.A INCOME AND ELIGIBILITY

- Language was added to state that SAHA will be administering enhanced vouchers.
- Enhanced vouchers provide certain tenant protections for low-income families who reside in private properties that are converting from HUD rental assistance programs.

# PROPOSED ADMIN PLAN CHANGES

15

## 3.3.D OTHER PERMITTED REASONS FOR DENIAL

- Language was updated to clarify that SAHA will deny assistance for previous terminations (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.
- This aligns with policy in place for SAHA's Public Housing Program. The reason for this change is to make the HCV Program more accessible to our applicant families.



# PROPOSED ADMIN PLAN CHANGES

16

## 5.2.B DETERMINING FAMILY UNIT (VOUCHER) SIZE

- Language was added to 5.2.B(4) to specify situations where anticipated children will be counted in the family voucher size; pregnancy will be counted upon submission of supporting documentation and adoptions will be counted after proof that the adoption is complete or awarded.

# PROPOSED ADMIN PLAN CHANGES

17

## 8.1.B ADDITIONAL LOCAL REQUIREMENTS

- Language was added to this section from previous policy (Admin Plan FY17-18) to revert to allowing landlords an option to obtain verification of additional bedrooms through Bexar County Appraisal District (BCAD) or a licensed professional, versus requiring authorization only through BCAD.

# PROPOSED ADMIN PLAN CHANGES

18

## 8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

- Language was updated to reflect current practice that SAHA posts inspection results for the owner electronically to the Landlord Portal.

# PROPOSED ADMIN PLAN CHANGES

19

## 16.3.B INFORMAL REVIEWS

- Language was added to 16.3.B(3)(c) to state that SAHA will provide an informal review upon the denial of a voucher term extension or suspension.
- Even if SAHA is not required to by HUD to provide a review under this circumstance [24 CFR 982.555], permitting these informal reviews has often resulted in overturns and additional chances for the family.

# PROPOSED ADMIN PLAN CHANGES

20

## 18.6.C ORGANIZATION OF THE WAITING LIST

- Language was updated to establish a single waiting list for the Project-Based Voucher (PBV) Program. While SAHA currently administers separate waiting lists for each PBV development, the consolidation will streamline waitlist management and reduce applicant wait times.

# PROPOSED ADMIN PLAN CHANGES

21

## 18.6.D SELECTION FROM THE WAITING LIST

- Language was removed from this section to clarify that the St. Philip's College Homeless Program is not being administered as a PBV program.

# PROPOSED ADMIN PLAN CHANGES

22

## 19.3.A SELECTION FROM THE WAITING LIST

- Language was added to allow SAHA to assist Moderate Rehabilitation (Mod-Rehab) partners in converting to Rental Assistance Demonstration (RAD) if they express interest to SAHA.

# PROPOSED ADMIN PLAN / ACOP CHANGES

23

## 3.3.C MANDATORY DENIAL OF ASSISTANCE

- This section adds language to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.



# PROPOSED ADMIN PLAN / ACOP CHANGES

24

## 3.3.C MANDATORY DENIAL OF ASSISTANCE

## 16.3.B FAMILY DEBTS TO SAHA

- These sections add language to allow SAHA to set up repayment agreements with applicant families who owe debts to SAHA.
- The reason for these changes is to make the Housing Choice Voucher (HCV) Program and Public Housing Program more accessible to applicant families.

# PROPOSED ADMIN PLAN / ACOP CHANGES

25

## 9.3.C/11.2.C INTERIM REEXAMINATIONS

- Language was added for 9.3.C in the ACOP and 11.2.C in the Admin Plan to specify that SAHA will not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months.
- This language is being added to align policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

# NEXT STEPS

26

## MARCH

- Capture public comment
- March 18: Public hearing

## APRIL

- April 1: Board consideration of MTW Plan
- April 15: Submit MTW Plan to HUD

## JULY

- Implementation of MTW Plan

# QUESTIONS?

## APPENDIX B.4.a.:PUBLIC COMMENT DOCUMENTATION

The 2022 MTW Plan was originally posted for public comment on February 23, 2021. The draft Plan was posted on SAHA's website. On March 3, 2021, the Agency posted an amendment to the plan to include a new proposed MTW activity.

The public comment period closed on April 20, 2021 at 5 p.m.

A variety of opportunities were provided for public comment, including via email to [mtw@saha.org](mailto:mtw@saha.org), by mail to 818 S. Flores, at two public hearings, at one resident public comment meeting, and, for the first time the Agency deployed a robust survey outreach plan.

Below is a summary

### Meeting/Sessions and attendance

- Due to the ongoing pandemic, no in-person meetings were held.
- One Zoom meeting for housing choice voucher participants, public housing residents, and landlords was held on April 13, 2021
  - 45 registered
  - 15 attendees
  - 8 confirmed resident attendees

### Survey

- In lieu of in-person meetings, a survey was developed and administered to capture opinions on the proposed policy changes in the MTW Plan, ACOP, Admin Plan, and FSS Action Plan.
- The survey was titled “We want to hear from you!” and 21,567 surveys were sent out from April 8, 2021 to April 14, 2021.
- Survey methods included email, mail, and hand-delivery.
- As of April 20, 2021, a total of 986 responses were received.
- Documents are included below and provide a summary and analysis of survey results, a presentation of survey results, and staff responses.

### Board and Committee Meetings

- March 18, 2021 Public Hearing (during the Operations and Choice Neighborhood Committee meeting): No attendees signed up to make public comments.
- April 15, 2021 Public Hearing (during the Operations and Choice Neighborhood Committee meeting): One attendee signed up but did not respond during the public hearing.
- May 6, 2021 Regular Board of Commissioners meeting: No attendees spoke to the items.



## **APPENDIX B.4.b.:FY2022 MTW PLAN OUTREACH OVERVIEW AND SUMMARY REPORT**



## APPENDIX B.4.b.:FY2022 MTW PLAN OUTREACH OVERVIEW AND SUMMARY REPORT

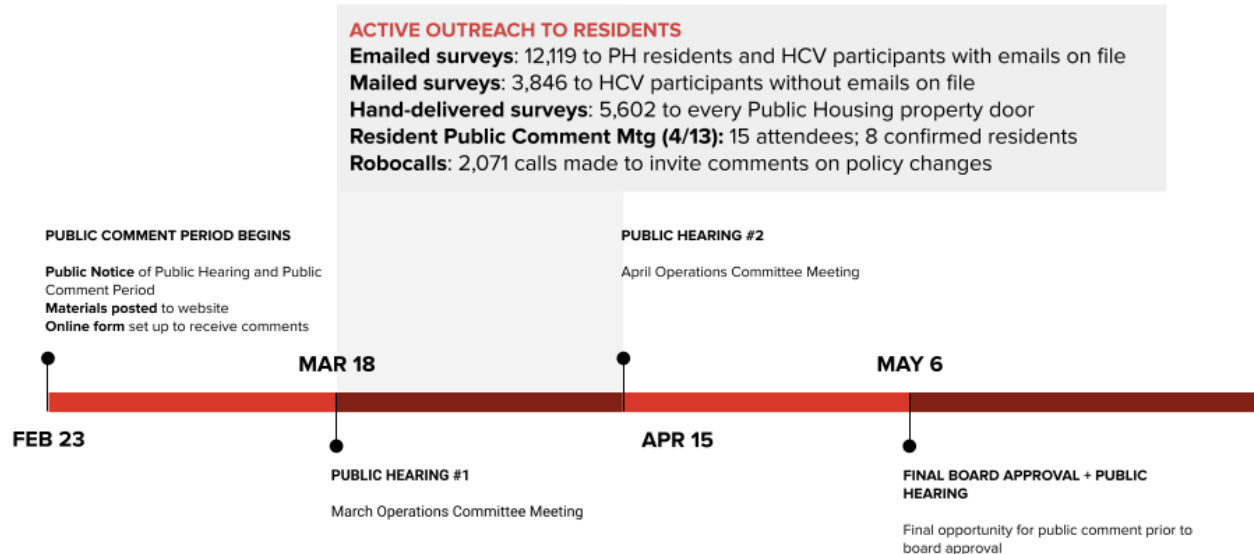
### Outreach Overview

The Agency's outreach effort was drive by two main goals:

1. Mitigate the impact of COVID-19 and the recent winter storm on feedback and the MTW annual schedule
2. Collect public comment on the proposed changes in the MTW Plan including program policy changes in the following implementation documents: ACOP, ADMIN, and FSS Action Plans

In addition to the methods described throughout this report, the Agency provided recorded presentations with in-depth descriptions of proposed policy changes in addition to documents with written summaries of the proposed changes. These videos were made available on [saha.org](https://www.saha.org).

Figure 1. MTW Timeline with Resident Outreach



## SURVEY

A survey titled “We want to hear from you!” was prepared and sent out April 8, 2021 to April 14, 2021. The survey was provided in Spanish and English and delivered using three methods: emailed google form, mailed paper form, and a hand-delivered paper form. Each question described the policy change and then asked respondents to provide their feedback using a likert scale. The survey communicated that it was anonymous and voluntary. In addition, the survey stated that participation in the survey would not impact the respondent’s application status or participation in any SAHA programs. Information in this summary report includes responses received by May 5, 2021.

### Delivery and response statistics

*Table 1. Response rates by delivery method*

Method	Target Population	Sent	Responses	Response (%)
Emailed Google Form	HCV and PH residents with email	12,119	429	3.5%
Mailed Hard-Copy	HCV residents without an email	3,846	814	21.2%
Hand-Delivered Hard-Copy	PH residents	5,602	58	1.0%
<b>TOTAL</b>		<b>21,567</b>	<b>1,301</b>	<b>6.0%</b>

*Table 2. Email delivery detail*

Result	Emails	Emails (%)
Bounced	678	5.6%
Email Opened	5,663	46.7%
Survey Link Opened	1,207	10.0%
	<b>12,119</b>	<b>100.0%</b>

*Table 3. Responses by self-identified SAHA housing program*

Self-identified SAHA Housing Program	Responses	Response (%)
Housing Choice Voucher Program	843	64.8%
Public Housing Program	332	25.5%
Other (Includes Other and No Answer)	126	9.7%
<b>TOTAL</b>	<b>1,301</b>	<b>100.0%</b>





## Topics

The following topics were covered by the survey:

- Public Housing Policy Changes (ACOP)
- Housing Choice Voucher Policy Changes (ADMIN Plan)
- Family Self-Sufficiency (FSS) Program Action Plan

## Likert Scale

All responses are rated on a scale from 1 to 5, where 1 is Strongly Oppose, and 5 is Strongly Support. In this report, colors are assigned to each response value in the following way:

■ Strongly Support ■ Somewhat Support ■ No Opinion / Do not know ■ Somewhat Oppose ■ Strongly Oppose

## Results

A total of 22,066 individual question responses were received across the 1,301 survey responses. Not all survey responses received had responses for all questions. As a result, each question has a separate total number of responses from which percentages are calculated.

Of the responses received, 61.0% or 13,453 indicated their support for the policy change. Slightly over a quarter or 29.2% selected three on the scale indicating the responder either had no opinion or did not know. Ten percent or 2,178 of the responses indicated they did not support the policy change. The average question response score was 3.85.

*Table 3. Summary results for all question responses*

Response Category	Responses	Response (%)
1 - Strongly Oppose	1,126	5.1%
2 - Somewhat Oppose	1,052	4.8%
3 - No Opinion / Do not know	6,435	29.2%
4 - Somewhat Support	4,860	22.0%
5 - Strongly Support	8,593	38.9%
<b>TOTAL</b>	<b>22,066</b>	<b>100.0%</b>

In the following tables, the results are displayed by survey question.



## PUBLIC HOUSING

Table 4a. Public Housing Policy Change Response Count Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
2. Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the ACOP Plan (pg 3-38).	52	45	165	118	325
3. SAHA proposes to eliminate the ability to choose preferred Public Housing developments at the time of application in order to reduce applicant wait times and streamline waitlist management.	95	80	168	135	235
4. SAHA proposes to implement a 4-to-1 ratio of elderly to non-elderly disabled residents at Marie McGuire.	43	57	303	120	182
5: SAHA proposes to implement a preference to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services while residing in Victoria Plaza.	32	26	215	154	285
6: SAHA proposes to establish a 10-business-day timeframe for move-out of live-in aides if the sole household member receiving housing assistance passes away.	108	61	169	131	246
7: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.	45	42	271	148	218
8: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.	28	36	166	179	324
<b>Total</b>	<b>403</b>	<b>347</b>	<b>1,457</b>	<b>985</b>	<b>1,815</b>

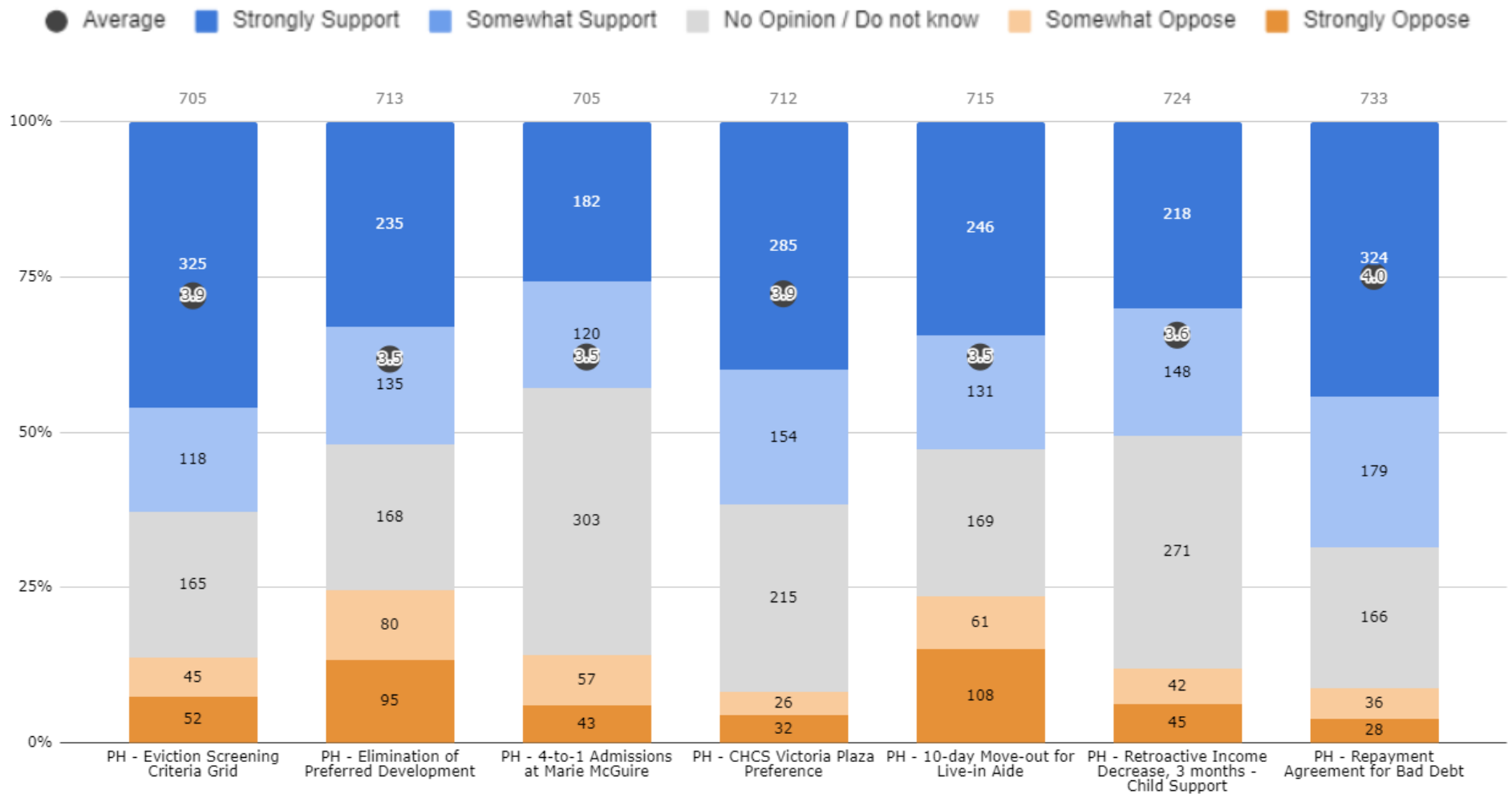


Table 4b. Public Housing Policy Change Response Percentages Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
2. Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the ACOP Plan (pg 3-38).	7.4%	6.4%	23.4%	16.7%	46.1%
3. SAHA proposes to eliminate the ability to choose preferred Public Housing developments at the time of application in order to reduce applicant wait times and streamline waitlist management.	13.3%	11.2%	23.6%	18.9%	33.0%
4. SAHA proposes to implement a 4-to-1 ratio of elderly to non-elderly disabled residents at Marie McGuire.	6.1%	8.1%	43.0%	17.0%	25.8%
5: SAHA proposes to implement a preference to allow SAHA partner, Center for Health Care Services (CHCS), to refer disabled families to receive on-site supportive services while residing in Victoria Plaza.	4.5%	3.7%	30.2%	21.6%	40.0%
6: SAHA proposes to establish a 10-business-day timeframe for move-out of live-in aides if the sole household member receiving housing assistance passes away.	15.1%	8.5%	23.6%	18.3%	34.4%
7: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.	6.2%	5.8%	37.4%	20.4%	30.1%
8: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.	3.8%	4.9%	22.6%	24.4%	44.2%
<b>Total</b>	<b>8.0%</b>	<b>6.9%</b>	<b>29.1%</b>	<b>19.7%</b>	<b>36.2%</b>



Chart 1. Public Housing Policy Change Response Summary



APPENDIX B: HUD Information Reporting Requirements | Public Comment Documentation



## HOUSING CHOICE VOUCHER

Table 5a. Housing Choice Voucher Policy Change Response Count Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
9: SAHA proposes to administer vouchers with additional tenant protections for at-risk households identified through SAHA partners.	39	34	216	261	427
10: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.	59	62	330	217	311
11: SAHA proposes to require supporting documentation prior to updating family voucher size in the cases of pregnancy and adoption.	37	42	244	228	427
12: Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the Admin Plan (pg 3-32).	57	59	191	191	480
13: SAHA proposes to deny assistance for previous termination (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.	84	66	198	218	369
14: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.	45	45	154	229	450
15: SAHA proposes to establish a single waiting list for SAHA's entire Project-Based Voucher (PBV) Program, rather than separate waiting lists per development, in order to reduce applicant wait time and streamline waitlist management.	55	44	168	224	424
<b>Totals</b>	<b>376</b>	<b>352</b>	<b>1,501</b>	<b>1,568</b>	<b>2,888</b>

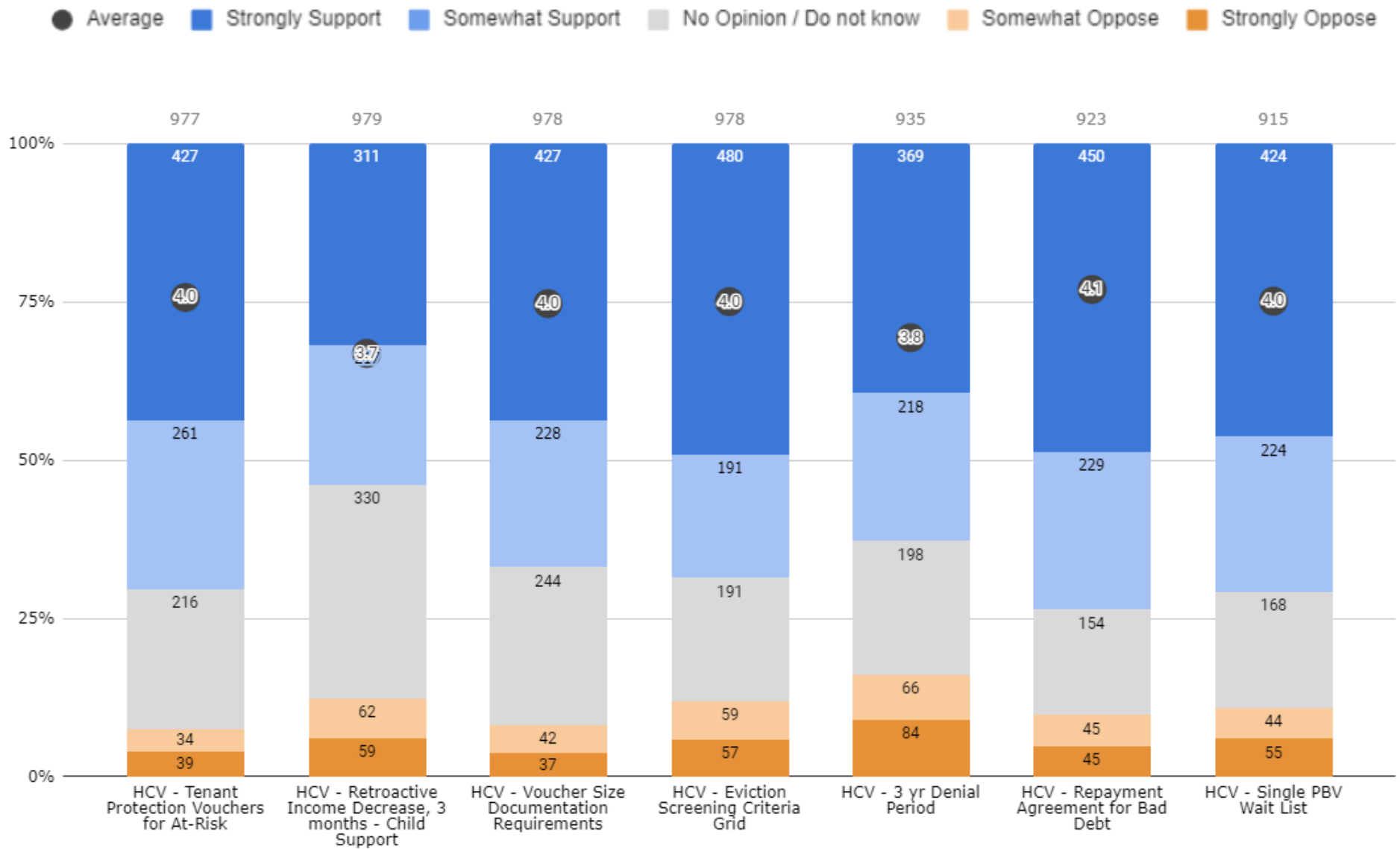


Table 5b. Housing Choice Voucher Policy Change Response Percentage Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
9: SAHA proposes to administer vouchers with additional tenant protections for at-risk households identified through SAHA partners.	4.0%	3.5%	22.1%	26.7%	43.7%
10: SAHA proposes to not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months, as these payments frequently change. The decrease will be retroactively applied to the first of the month following the date it was originally reported.	6.0%	6.3%	33.7%	22.2%	31.8%
11: SAHA proposes to require supporting documentation prior to updating family voucher size in the cases of pregnancy and adoption.	3.8%	4.3%	24.9%	23.3%	43.7%
12: Current policy states that SAHA will deny applicants if evicted in the last five years from federally assisted housing for drug-related criminal activity. Instead, SAHA proposes to screen these applicants using the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime (longer periods to check for more severe crimes and shorter periods to check for less severe crimes). SAHA's Criminal History Screening Criteria Grid can be located in Section 3.3.E of the Admin Plan (pg 3-32).	5.8%	6.0%	19.5%	19.5%	49.1%
13: SAHA proposes to deny assistance for previous termination (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior.	9.0%	7.1%	21.2%	23.3%	39.5%
14: SAHA proposes to allow an applicant to enter into a repayment agreement for bad debt with SAHA.	4.9%	4.9%	16.7%	24.8%	48.8%
15: SAHA proposes to establish a single waiting list for SAHA's entire Project-Based Voucher (PBV) Program, rather than separate waiting lists per development, in order to reduce applicant wait time and streamline waitlist management.	6.0%	4.8%	18.4%	24.5%	46.3%
<b>Totals</b>	<b>5.6%</b>	<b>5.3%</b>	<b>22.5%</b>	<b>23.5%</b>	<b>43.2%</b>



Chart 2. Housing Choice Voucher Policy Change Response Summary



APPENDIX B: HUD Information Reporting Requirements | Public Comment Documentation



## FAMILY SELF-SUFFICIENCY (FSS) ACTION PLAN

Table 6a. FSS Action Plan Policy Change Response Count Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
17: SAHA proposes making the Family Self-Sufficiency (FSS) Action Plan part of SAHA's annual Moving To Work (MTW) Plan. If SAHA makes this change, then moving forward, the public would be invited to comment on any policy changes to the FSS Action Plan.	54	74	461	280	356
18: Current policy does not show whether an FSS rule is required by federal law or by SAHA policy. SAHA proposes changing the FSS Action Plan to show which policies are required by law, and which are written by SAHA.	39	52	474	258	398
19: The FSS Action Plan explains the FSS Program and its goal of helping SAHA families achieve self-sufficiency. SAHA is not proposing changes to this goal, but asks for feedback on the FSS Program as a whole. The FSS Program is open to families in Public Housing and the Housing Choice Voucher program. FSS case managers offer services and other help to families who choose to be in the FSS Program.	35	31	368	285	503
20: SAHA proposes establishing a Program Coordinating Committee (PCC) as required by federal law. The PCC would help SAHA improve the FSS Program by increasing resources and support for FSS families.	34	33	256	246	545
21: The FSS Action Plan includes the “SAHA Incentive Services for Participation Grid,” which explains the services SAHA can give to families who take part in the FSS Program. Services include, among many others, an escrow account of money that increases over time. Families can build savings in this account by earning higher wages from work, and can receive a large payment when they finish the FSS Program. SAHA is not proposing changes, but asks for feedback on the FSS Program's incentive services.	38	34	346	249	461
22: SAHA proposes a “Dual Generation” approach to its FSS Program, which would encourage more family members to participate in FSS. This change would allow	35	28	315	266	473

## APPENDIX B: HUD Information Reporting Requirements | Public Comment Documentation





more than one person in an FSS family to create an Individual Training and Services Plan (ITSP.) The ITSP shows what services and support are needed to be successful and complete the FSS Program. An FSS case manager can then work with the person to receive individual support and achieve their own ITSP goals.

23: The FSS Action Plan says that SAHA will use its grievance policies when taking action against a family enrolled in the FSS Program. The ACOP and Public Housing Lease explains the informal conference and hearing policies for FSS families in Public Housing. The Administrative Plan explains the informal review and hearing policies for FSS families in the Housing Choice Voucher (HCV) program. SAHA is not proposing changes, but invites feedback on using grievance policies for the FSS Program.	29	34	430	262	364
24: SAHA proposes sending all FSS Program families a letter each year that shows the amount of money in their escrow account.	38	30	298	217	540
25: How much do you agree with the following statement: "The proposed changes to FSS Program increased my interest in joining the FSS Program"? If the question does not apply or you are not a SAHA client, please mark option 3.	45	37	529	244	250
<b>Totals</b>	<b>347</b>	<b>353</b>	<b>3,477</b>	<b>2,307</b>	<b>3,890</b>



Table 6b. FSS Action Plan Policy Change Response Percentages Summary

Question	1 - Strongly Oppose	2 - Somewhat Oppose	3 - No Opinion / Do not know	4 - Somewhat Support	5 - Strongly Support
17: SAHA proposes making the Family Self-Sufficiency (FSS) Action Plan part of SAHA's annual Moving To Work (MTW) Plan. If SAHA makes this change, then moving forward, the public would be invited to comment on any policy changes to the FSS Action Plan.	4.4%	6.0%	37.6%	22.9%	29.1%
18: Current policy does not show whether an FSS rule is required by federal law or by SAHA policy. SAHA proposes changing the FSS Action Plan to show which policies are required by law, and which are written by SAHA.	3.2%	4.3%	38.8%	21.1%	32.6%
19: The FSS Action Plan explains the FSS Program and its goal of helping SAHA families achieve self-sufficiency. SAHA is not proposing changes to this goal, but asks for feedback on the FSS Program as a whole. The FSS Program is open to families in Public Housing and the Housing Choice Voucher program. FSS case managers offer services and other help to families who choose to be in the FSS Program.	2.9%	2.5%	30.1%	23.3%	41.2%
20: SAHA proposes establishing a Program Coordinating Committee (PCC) as required by federal law. The PCC would help SAHA improve the FSS Program by increasing resources and support for FSS families.	3.1%	3.0%	23.0%	22.1%	48.9%
21: The FSS Action Plan includes the "SAHA Incentive Services for Participation Grid," which explains the services SAHA can give to families who take part in the FSS Program. Services include, among many others, an escrow account of money that increases over time. Families can build savings in this account by earning higher wages from work, and can receive a large payment when they finish the FSS Program. SAHA is not proposing changes, but asks for feedback on the FSS Program's incentive services.	3.4%	3.0%	30.7%	22.1%	40.9%
22: SAHA proposes a "Dual Generation" approach to its FSS Program, which would encourage more family members to participate in FSS. This change would allow more than one person in an FSS family to create an Individual Training and Services Plan (ITSP.) The ITSP shows what services and support are needed to be successful and complete the FSS Program. An FSS case manager can then work with the person to receive individual support and achieve their own ITSP goals.	3.1%	2.5%	28.2%	23.8%	42.3%

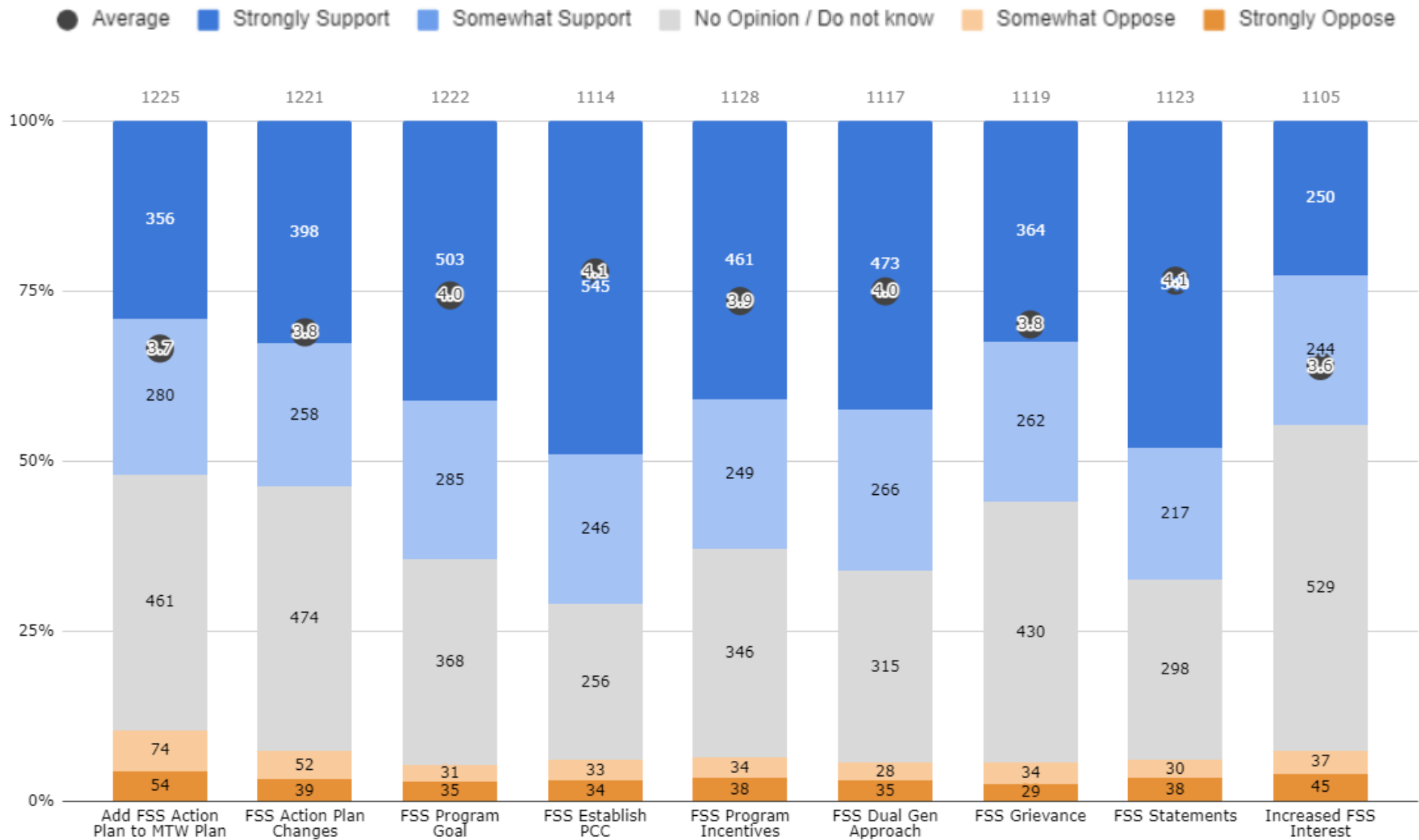
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23: The FSS Action Plan says that SAHA will use its grievance policies when taking action against a family enrolled in the FSS Program. The ACOP and Public Housing Lease explains the informal conference and hearing policies for FSS families in Public Housing. The Administrative Plan explains the informal review and hearing policies for FSS families in the Housing Choice Voucher (HCV) program. SAHA is not proposing changes, but invites feedback on using grievance policies for the FSS Program.	2.6%	3.0%	38.4%	23.4%	32.5%
24: SAHA proposes sending all FSS Program families a letter each year that shows the amount of money in their escrow account.	3.4%	2.7%	26.5%	19.3%	48.1%
25: How much do you agree with the following statement: "The proposed changes to FSS Program increased my interest in joining the FSS Program"? If the question does not apply or you are not a SAHA client, please mark option 3.	4.1%	3.3%	47.9%	22.1%	22.6%
<b>Totals</b>	<b>3.3%</b>	<b>3.4%</b>	<b>33.5%</b>	<b>22.2%</b>	<b>37.5%</b>



Chart 3. FSS Action Plan Policy Change Response Summary



## Comments written on the hard-copy surveys

Below is the list of additional comments hand-written on the hard-copy surveys.

1. Commented under: #9, "I don't know what additional protections can be given, as a medical individual, it will not get better for me", #10-11 "Doesn't apply to me... I cannot judge others", #12 "If this is protecting tenants in/around placement settings, yes. PPL can/do change their lives for the better. and some don't", #13 "2nd changes in life, can help those that help themselves.", #14 " Always allow opportunity to make amends. God forgives us, died for us.", #15 " Not knowledge enough on these other programs. ... should have a list for each qualifying program, my opinion", #16 " SAHA client, stroke pt medically will not change - only progress", #17 "If PPL can work they need schooling to better themselves", #19 " If PPL are able, they need education, some of us are unable."
2. "I don't know what FSS is! I'm on Section 8 program"
3. Commented by: #2 "Non-care givers who are family. Theft is rampant - This is for safety of seniors. In Senior Housing Been Robbed - "hurt", #4 " No - No - Seniors Need Protection!", #13 " Should -- Should be Forever!", #14 " No ---- Not acceptable - Pay is required - By Law - No Free Ride! By State....", #16 "Drop this Program", #12 "Criminal Behavior is a huge problem at Senior housing. The issue is family members moving in Rent Free, and climbing in the windows, knocking on windows to get access - Grandmothers are the main target!", #20 " What - No - If your 18 your a legal adult!! - get a Job - unions here - train - for high pay jobs", #21 "This kills - drive, hope, education. And getting out of bed - Think about it", #22 " I did it on my own - with a family and a dead partner", #23 "If you don't work you don't pay into SS - for your retirement - think about that... life is hard knowcks - not a free ride!", "Forgive me for being hard. My motive to awake those help is good intention, but kill personal dreams and accomplishments- we are not a social government"
4. "Ten days is not enough for the person to find a place to live"
5. "I am disabled"
6. "My apologies I did not notice that the first section was for public housing"
7. Commented by: #19 "My laptop is disabled...I'm disabled - and have leg pain did the best I could"
8. Came with note and contact information; "I answered these questions. I'm really not understanding at all so I did answer no opinion I hope I don't have to move again right now. I wish I could understand about this. I'm on Section 8 I'm doing the best I can with what I got I have not received not one stimulus check yet not one.", #16 "Don't know what this one means FSS Program",
9. Answered to understanding
10. 16 - "Nature of psychological/mental disability/ and physically getting older and slower", 17 - "Depends on the definition of public, I suppose", 22 - "I'm sure for MANY people this is a GOOD DEAL", 25 - "I just don't believe the program would have ever worked for me. I



attempted to "get back into the workforce" back during 1990 thru '97. It resulted in my suffering A NEAR nervous breakdown."

11. "Recieved survey on 4/12/21"
12. "I don't have a computer and don't know how to use one. I also don't have internet [illegible], only a plain phone!", under 16, "I don't even know what FSS prog means so I can't answer", below 18, "I don't know what you're talking about!"
13. "Thank you...Great Idea! Finally"
14. Commented on question 14, "A bad debit was cause of a hardship it should be forgiven"
15. "Go Spurs Go"
16. "I don't know what FSS means"
17. Commented on question 13, "Should take no longer than few months for help"
18. Commented on question 6, "30 days"
19. Comment about change in address
20. Commented under question 13 "Oppose both time-lines; but prefer three years rather than five years"
21. Commented "I am 84 years old - couldn't understand some questions. Thank you!"
22. Commented " I'm sorry I hope I fill(ed) it (out) right cause I don't understand it I'm sorry." Personal information. "I have been living here since 2000 I don't think I'm willing to move. Thank you very much"
23. Left a comment apologizing for submitting it late, saying it was recieved on the 14th, and that (s)he has been ill with vertigo.
24. Commented under #6 "More time should be given"
25. Commented "I strongly believe that SAHA should move single people over and under single people, not more disrupted children over quiet and single people. If anything get broken in my appt. someone is going to pay! I strongly believe you SAHA should do a more severe background check on your tenants ina ll areas in houses and apartments!!!" also added "Give people more allowances for FSS in owning a home; more funding"
26. Commented under #13 "Make time frame lower"
27. Expressed difficulty understanding questions in comments.
28. Left note "Mother disabled and 75 years old"
29. Commented "Sorry this is late. Hope you will still take. Thank you"
30. Didn't understand the meaning of certain questions.
31. "Family Emerg. Sorry it's late!"
32. Commented "On Section 8" by question 16
33. Commented by #6, "Can it be longer than 10 days. Can another household member take over that qualifies?"
34. Left a note apologizing for being late. Commented by #12, "I was you could say raised through the system jail, 2.D.C. of several drug rehabs I felt through to share this with you because its not good to lie....I know ppl that take such advantage of your programs and it gets me mad I waited a long time and during the night teams until the .... helped me... what I am everything to get it is that.... really have changed and need your help I was



blessed Then theirs ppl. I could give you a ... not only take advantage of SAHA but of the provider jobs also getting paid not working just gets half of check., #14 "We all make mistakes but we grow up my rent is the ... I pay", #16 "I know that I'm in the SAHA Mainstream",

35. "I'm didn't understand to much of the words I answered the best I could Thank You"

36. 6: preparations for the last one takes about 10 days; should be 20 days

37. Commented under question: 2 "How ... can SAHA be that they have truly been rehabilitated? Lots of ... confidentiality etc", 3 "I believe they should have a choice. You are implying that (over please), 4 "Poor mix. Nothing in common. No common ... interaction - causes a "split" - jeopardizes elderly safety", 5 "Should be for ALL elderly properties", 6 "Absolutely - Very difficult to prepare a decent funeral + trying to move at same time. Also rent paid to end of month. "

## OTHER COMMENTS RECEIVED

Prior to sending out the survey, the Agency offered an open-ended google form available on [saha.org](http://saha.org) for the public to submit comments. In addition, the Agency received some comments via [mtw@saha.org](mailto:mtw@saha.org).

1. "People like me who had saw her took away because of a landlord's brother who lied about what happened should be able to get back there saha without any problems with any one"
2. "I live at your property Villa De Valencia. I'm on SSI. They are making the HUD recipients leave their apartment. I have 1 year. I'm disabled. This area makes it very convenient for me to get to the store to get food and up prescriptions. Its also safe for a person with limited vision. I believe that this is bullying a person from were they stay for business and financial gain. This should be a time. At a time like this during covid this game should not be being played by anyone. This has happened to so many people who have been racially abused and that fo not have much money. Perhaps you can get some help for the people of the community who want to be able to stay in their apartment. There is a pandemic going on w different variants. Thank you"
3. "Ok"
4. "Ok"
5. "I disagree, opposed, and think it is ridiculous regarding "Decrease in Child Support Payments and Temporary Employment Income Reason for update to 11.2.C: "Changes Affecting Income or Expenses  
SAHA inputted the word "periodically" and what that word mean is "from time to time; occasionally  
The child support and temporary employment is unreliable income especially during a pandemic.



SAHA should be doing this policy the other way around. Let the participants get 3 months of that income then report it if the income is still coming in by then end of the 3 months.

It would not be a burden to staff if SAHA was not understaffed. Participants should not have to pay for SAHA mistake of not opening the office to the public so their employees could work instead of being lay off.

Staff already have 30-45 days to make changes to a case which is not fair when participants are given a shorter time frame to give paperwork to caseworkers when they request it.

SAHA did not think how this unreliable income can hurt a participant to pay 3 months of increase rent if there is no money coming in to pay it making the participant to go into default. This would put a burden on participants.

We are in a pandemic and SAHA should not be changing policies and making it worse regarding income because of administrative burden.

We live in an "At Will" state, we are in an economic pandemic and at this point no income is guaranteed.

I hope I do not get any retaliation for speaking my mind."

6. "Thank you for all your help I hope to be a homeowner in the next couple of years I am 62 and disabled we without you I would have never made to college with funding and because of and I want to thank you from the bottom of my heart I was very very ill for quite a few years but because of Saha I made it to thank you and a special thanks to Barb Daniels again and Sarah Hernandez have a great day prayer now"

## RESIDENT PUBLIC MEETING

The Agency held one zoom meeting on April 13, 2021 for residents. Notice of the resident meeting was included in all surveys as well as on saha.org. This public comment meeting had 45 registered; and 15 attendees of which 8 were confirmed to be residents. The following table provides a list of questions and comments addressed during the meeting.





Table 7. Resident Public Comment Meeting Summary

#	Question	Staff Response(s)
1	will fss be available for section 8?	Yes, FSS is available for both Public Housing residents and Housing Choice Voucher (HCV or "Section 8") program participants. Residents and participants who are interested may email us at FSS@saha.org.
2	so if a decrease of income for child support of \$250 will be reviewed?	live answered - Yes, the way that works is if we have a family that reports a decrease of income, if its child support we make a note of that and its entered into the system we use to keep track of our client accounts. Our staff maintains that and we ask them to report back to us after three months. So we can see whether or not it has continued to decrease or gone back up. If it has continued to decrease at the end of the three months, we recalculate the amount of rent that they would have owed and needed to pay. That amount is then returned to them. What we're trying to do is make sure that the drop in income is not temporary.
3	will a proposal be available for a three month for wait for income change for policy?	This policy does not go into effect until July 1st, correct. What we are proposing is posted on the website, and the timeline and changes.
4	Will a proposal for drug testing to the families on SAHA to be helpful to stop the drug use in the community.	We are unable to provide drug testing for our participants, as per Federal regulations. We do check criminal history records, and we do take into consideration drug related criminal activities. If the applicants show proof of treatments and rehabilitative action, we consider that as well.
5	So will SAHA also waive late payment fees if child support or temp employment rate fluctuate from month to month?	live answered - It depends on which program you are in. For Public Housing, that individual may receive an amount in their rental payments. Let's say they have \$200 after the income change, that amount can be applied to their rental payments. The late payment fees would be waived at that point. We are always applying the rent payments to the last rent date so that it doesn't compile with each other.
6	How will rent payments be dealt with and/or kept from compiling if for example 2 months past with no payment but the 3rd month payments resume. There is still 2 months with no payment. (child support/temp employ)	live answered - That would be made retroactive so we would be applying any rent payments to the most recent due amount so that it doesn't compile.
7	hello if I paid deposit am I responsible to pay for wear and tear repairs to my landlord	live answered - It depends on which program they are in. For any questions about specific accounts please email us at MTW@SAHA.org so that we can look into it and get back to you.
8	Besides the escrow account, which is great, what other incentives are being thought about to encourage residents to enroll into the FSS program?	live answered - The reason why our FSS program is the most popular is because of the escrow. ANytime that we are able to provide a financial incentive to our residents to help them achieve financial independence through our programs, it's a huge deal. The only other program that does it is our JOBSPlus program from HUD, which we previously administered but we are waiting on

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	our grant application to see if we received it. Our other programs, our ROSS, Elderly Disabled Service, are excellent but we don't see the number of consistent enrollees that we see for our 5 year contract with our FSS program. The case management itself is an incentive, with the ultimate goal of financial independence. Another incentive is to benefit from access with our partnerships who offer job training, diapers, transportation, and things like that.
9 Will notices to vacate be canceled if those tenants that report a decrease in income during the 3 month period? I realize that due to covid notices havent been going out. But normal operations will resume at some point.	live answered - To clarify, the 3 month period is only triggered when a family reports a decrease in their income. We think of notices to vacate as a separate issue. The way they are occurring right now, is that if someone is behind on their rent, we are doing everything we can to set up a repayment plan with them. We don't want anyone to be evicted or terminated from the program from an inability to pay caused by this Pandemic. We review notices to vacate by at minimum, an assistant director or higher, to make sure that they are legitimate.
10 @Joel Tabar what is the Elderly Coordination Service you mentioned?	live answered - Our Elderly Coordination Services is a program where we offer assessments and referrals at our elderly and disabled properties. They have case managers assigned to them, who assist them with acquiring services and referrals. Any resident at those properties is eligible for the program, all they need to do is notify CDI.
11 I am on section 8 my email is [redacted] I am also on the FSS program	Thank you [redacted]! I took down your information. I'm going to have a staff individual reach out to you.
12 I ask the question on the repairs because I am moving due to my landlord charging me repairs and labor charges as well	
13 Thank you.	



## ROBOCALLS

The Agency conducted 2,063 robocalls on April 16, 2021 to all PH and HCV residents as well as HCV landlords to invite them to provide feedback. The message was provided in English and Spanish.

*“The San Antonio Housing Authority invites you to submit your comments about our annual policy changes for the Public Housing and Voucher Programs. Please visit the Public Notices page of SAHA's website to view these annual updates and give us your feedback any time from now until 5:00 p.m. on April 20, 2021. Thank you for your participation in SAHA's annual updates.”*



## APPENDIX B.5.: LOBBYING DISCLOSURES



# DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		<b>2. Status of Federal Action:</b> <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  San Antonio Housing Authority (TX006) 818 S. Flores St. San Antonio, TX 78204  <b>Congressional District, if known:</b>			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>    <b>Congressional District, if known:</b>		
<b>6. Federal Department/Agency:</b>  U.S. Department of Housing and Urban Development Office of Public and Indian Housing			<b>7. Federal Program Name/Description:</b>  Moving to Work (MTW) Demonstration Program  CFDA Number, if applicable: _____		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b>  \$		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):  Not Applicable			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature:  Print Name: Ed Hinojosa, Jr. Title: Interim President and CEO Telephone No.: 210-477-6047 Date: 5/11/21		
<b>Federal Use Only:</b>			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

# 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. This includes the time for collecting, reviewing, and reporting data. 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.

Applicant Name

San Antonio Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration 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

Ed Hinojosa, Jr.

Title

Interim President and CEO

Signature

Date (mm/dd/yyyy)

05/11/2021

## APPENDIX C: PROPOSED HOUSING PROGRAM IMPLEMENTATION POLICY CHANGES

Appendix C contains proposed changes to the Agency's implementation policies for the Public Housing Program and Assisted Housing Programs. Any substantial changes to implementation policies are subject to board approval. The Agency's current implementation policies as approved by the Board of Commissioners can be found at the following:

### Public Housing

[Current ACOP](#)

### Voucher Programs

[Current Admin Plan](#)



# Summary of Revisions to

## FY2021-22 Admissions & Continued Occupancy Policy

Indicates policy has been added

~~Indicates policy has been removed~~

### Reason for the Change to 3.3 Denial of Admission

Language was added to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.

Language was also added to allow SAHA to set up repayment agreements with applicant families who owe debts to SAHA.

Two of the Other Permitted Reasons for Denial of Assistance were removed as SAHA does not currently practice denying for those reasons and, additionally, does not have the capability of screening for them. SAHA wants to ensure that families have every opportunity to be admitted to the Public Housing Program and that any reasons for denial are fairly administered.

These changes are being proposed to make the Public Housing Program more accessible to our applicant families.

### 3.3 DENIAL OF ADMISSION

\*\*\*

#### 3.3.C MANDATORY DENIAL OF ASSISTANCE

\*\*\*

- (i) SAHA will deny assistance to an applicant family if any member of the household has been evicted from federally assisted housing ~~in the last five (5) years~~ for drug-related criminal activity in accordance with SAHA's Screening Criteria Grid [see 3.3.E SAHA Criminal History Screening Policy].
- (ii) SAHA will admit an otherwise eligible family who was evicted from federally-assisted housing within the past five (5) years for drug-related criminal activity, if SAHA is able to verify that the





household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by SAHA, or the person who committed the crime, is no longer living in the household.

\*\*\*

### 3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

\*\*\*

- (d) SAHA will deny admission to an applicant family if SAHA determines that the family:
- ~~(i) Has one (1) or more evictions for non-payment of rent within the past three (3) years;~~
  - ~~(A) SAHA will consider extenuating circumstances such as whether the applicant's rent was subsidized or not at the time of such evictions;~~
  - ~~(ii) Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past three (3) years;~~
  - (iii) Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing programs;
  - (iv) Owes rent or other amounts to SAHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family enters into a repayment agreement upon admission.

## Reason for the Change to 4.2.B Selection Method

Language was updated in 4.2.B to eliminate preferred developments to streamline waitlist management and reduce applicant wait times.

### 4.2.B ORGANIZATION OF THE WAITING LIST

\*\*\*

- (a) Beginning July 1, 2021, new Public Housing applicants will be added to a single, community-wide waiting list with all SAHA developments. Within that list, SAHA will designate subparts to easily identify who should be offered the next available unit (i.e., general occupancy developments, elderly / disabled developments, accessible units).
- (b) SAHA will maintain the current single community-wide waiting list with preferred developments until exhausted.

## Reason for the Change to 4.3.B Selection Method

Added Marie McGuire to the list of available properties under the 80/20 Elderly Preference.

This section also removes the Time-Limited Working Household Referral Program Pilot preference and the Restorative Housing Pilot Program preference as the pilot programs and corresponding MTW activities are being closed out.

A new preference has been added to allow SAHA partner, Center for Health Care Services (CHCS) to refer disabled families to receive on-site supportive services while residing in Victoria Plaza.

### 4.3.B SELECTION METHOD

\*\*\*

#### (2) Local Preferences [24 CFR 960.206]

\*\*\*

##### (g) Waiting List Preferences

Applicants will retain the assigned points throughout the waiting list, eligibility and offer process.

\*\*\*

~~(iii) Time-Limited Working Household Referral Program Pilot (40 Points) – Pilot program for a maximum of 200 families.~~

~~(A) This activity is designed to increase housing choices and promote self-sufficiency by providing working household in~~



- ~~need of short-term housing assistance an opportunity to quickly access public housing units.~~
- ~~(B) Working household who participate in this activity will receive five years of housing assistance, with a two-year extension if needed based on hardship.~~
- ~~(C) Preference Eligibility:
  - ~~(1) Referral from a partner agency who has entered into a memorandum of understanding with SAHA.~~
  - ~~(2) Enrollment and compliance with the Family Self-Sufficiency (FSS) or Jobs Plus program.~~~~
- ~~(D) The family must execute a lease addendum with a five-year term limit and a FSS or Jobs Plus contract at the time of admission.~~
- ~~(E) Noncompliance with FSS or Jobs Plus program requirements is considered a serious violation of the lease and grounds for lease termination.~~
- ~~(iv) **Restorative Housing Program Pilot (40 Points)** — Pilot program for a maximum of 50 probationers and their immediate families:
  - ~~(A) The population gap will include both probationers coming into new public housing units with their families and probationers who are moving in with immediate family that are already living in public housing units.~~
  - ~~(B) Preference Eligibility:
    - ~~(1) Referral from a partner agency who has entered into a memorandum of understanding with SAHA.~~
    - ~~(2) Enrollment and compliance with the Family Self-Sufficiency (FSS) Program and probation requirements.~~~~
  - ~~(C) The family must execute a lease addendum and an FSS contract at the time of admission.~~
  - ~~(D) Noncompliance with FSS program requirements and probation requirements is considered a serious violation of the lease and grounds for lease termination.~~
  - ~~(E) If a probationer applies to the pilot and their probation term expires before a spot in the pilot opens, their referral will~~~~



~~expire and they will need to re-apply for housing assistance.~~

~~(F) Probationers that commit a crime after being accepted into the pilot but before moving into their unit will be removed from the pilot and evicted under AGOP procedures.~~

(v) **80/20 Elderly Preference (40 Points)** - Extended to elderly families for 80/20 properties.

(A) SAHA implemented an 80 to 20 ratio of elderly to non-elderly disabled residents at Marie McGuire, Fair Avenue, WC White and Lewis Chatham to maintain an optimal mixed population in each community.

(B) SAHA will select elderly ~~residents~~ families from the waiting list at a higher rate than the 4-to-1 ratio to assist properties in meeting the target 80/20 mix.

(C) This preference will automatically be applied to those that meet the preference eligibility criteria until such time as an optimal mix of elderly and non-elderly disabled residents is reached for an 80/20 community. Preference may be applied only to maintain the designated ratio of populations at 80/20 properties.

(D) ~~Preference Eligibility:~~

~~(1) Be a elderly family; and~~

~~(2) Select either Fair Avenue, WC White or Lewis Chatham through the online application.~~

(vi) **Victoria Plaza Supportive Services Preference (40 Points)** - Extended to disabled families referred by Center for Health Care Services (CHCS).

~~(A) Families referred will be given preference at the Victoria Plaza community and will receive on-site supportive services from CHCS.~~

## Reason for the Change to 6.1.E Earned Income Disallowance

This section was updated to reflect the discontinuation of S-EID effective in the FY21-22 MTW Plan. Note that the traditional EID calculation will still not be used. A citation to SAHA's FSS Action Plan was also added.



## 6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]

\*\*\*

### (2) Simplified-Earned Income Disallowance (S-EID)

(a) Per MTW Activity "FY2013-2: Simplified Earned Income Disregard (EID)," SAHA will not disregard income for MTW participants using the traditional EID calculation.

**(a) Eligibility**

~~(i) The S-EID is offered to family members 18 years and older currently participating in the Jobs Plus Program.~~

~~(ii) To continue receiving the benefit, residents must comply with public housing lease terms and Jobs Plus program requirements, including a SAHA-referred financial literacy course.~~

~~(ii) To qualify, the family must experience an increase in annual income that is the result of one of the events of 6.1.E(1)(a)(i)(A)-(C) above.~~

**(b) Lifetime Limitation**

~~(i) This S-EID has a five-year lifetime maximum, which will not be suspended due to periods of unemployment.~~

**(c) Calculation of the Disallowance**

~~(i) Year One: 100% of the earned income disregarded;~~

~~(ii) Year Two: 80% of the earned income disregarded;~~

~~(iii) Year Three: 60% of the earned income disregarded;~~

~~(iv) Year Four: 40% of the earned income disregarded; and~~

~~(v) Year Five: 20% of the earned income disregarded.~~

~~(d) The initial exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.~~

~~(e) An S-EID or JP-EID participant is not eligible to have an escrow account.~~

\*\*\*

**(4) Family Self-Sufficiency (FSS)**

\*\*\*

(g) See SAHA's FSS Action Plan for additional information.

**Reason for Change to 6.1.K: “Periodic and Determinable Allowances”**

Language was added to 6.1.K(3)(e) to state that contributions provided to SAHA families by SAHA partners would not count toward a family's income. The reason for this change is to allow assisted families access to contributions from community partners without financial burden. Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners such as regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), cash or other liquid assets, and “in-kind” contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.

This change is being proposed in the MTW Activity FY2022: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions.

**6.1.K PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]**

\*\*\*

**(3) Regular Contributions or Gifts**

\*\*\*

(e) SAHA will not include in income regular monetary or nonmonetary contributions or gifts provided by SAHA partners.

## **Reason for the Change to 9.3.B(7)(b)(i) Changes in Family and Household Composition**

Language was added to establish a specified timeframe for move-out of live-in aides when the Head of Household (sole family member) passes away.

### **9.3 INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]**

\*\*\*

#### **9.3.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION**

\*\*\*

##### **(7) Departure of a Family or Household Member**

\*\*\*

(i) If a live-in aide is the only remaining member of the household, the live-in aide must vacate the unit within 10 business days.

## **Reason for the Change to 9.3 Interim Reexaminations**

Language was added for 9.3.C to specify that SAHA will not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months. This language is being added to align policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

Additionally, this section was updated to state that SAHA will not process increases in income over \$200 in earned and unearned monthly income, including new employment. This will allow our families to maintain their current rent amount and will reduce staff burden, cost and time spent processing changes. SAHA will still process all increases for FSS Participants, EID Participants and Zero-Income Participants.

Language was also added to clarify SAHA's actions when a change of income is reported and to align with Housing Choice Voucher Program policy.



## 9.3 INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]

\*\*\*

### 9.3.C CHANGES AFFECTING INCOME OR EXPENSES

\*\*\*

#### (b) *Required Reporting*

\*\*\*

- (B) SAHA will not process increases in income under \$200 in earned and unearned monthly income, including new employment.
- (C) SAHA will process all increases in earned and unearned income for FSS Participants, EID Participants and Zero-Income Participants.
- ~~(B) SAHA will process all changes in earned and unearned income.~~

\*\*\*

#### (c) *Optional Reporting*

\*\*\*

- (iii) If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, SAHA will note the information in the tenant file, but will not conduct an interim reexamination.
  - (A) This does not apply to FSS clients, Homeownership Participants, and participant's reporting zero income, all changes must be completed.
- (iv) If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, SAHA will conduct an interim reexamination. See Section 11.2.D. for effective dates.
- (v) Families may report changes in income or expenses at any time.
- (vi) SAHA will not decrease income from temporary job placements until the family provides evidence that payments have decreased for three consecutive months.



(A) Once documentation of decreased income from temporary job placements is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

(vii) If the family declares that it has received a decrease in child support payments, SAHA will not decrease income until the family provides supporting documentation that payments have decreased for three consecutive months.

(A) Once documentation of decreased child support is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

## Reason for the Change to 12.4 Transfer Processing

This section was updated to revert back to policy from 2017 and states that SAHA will not conduct an annual reexamination at transfer. This change will alleviate staff burden, which has increased since the policy was changed after 2017.

### 12.4 TRANSFER PROCESSING

\*\*\*

#### 12.4.F REEXAMINATION POLICIES FOR TRANSFERS

- (1) SAHA will not perform a new annual reexamination if the family transfers to a new unit. If the family moves to a new unit, SAHA will perform a new annual reexamination, unless a reexamination has been conducted within the last 120 days.

## Reason for the Change to 16.3.B Family Debts to SAHA

Language was removed from 16.5.B(4)(b)(i) to align with the policy change above; being an applicant does not disqualify someone from establishing a repayment agreement.

## 16.3.B FAMILY DEBTS TO SAHA

\*\*\*

### (g) *No Offer of Repayment Agreement*

SAHA will not offer the family a repayment agreement when the following circumstances apply:

- ~~(i) The family is an applicant;~~
- (ii) The family has an existing repayment agreement with SAHA;
- ~~(ii)~~ (iii) The family has not completed a repayment agreement within the last six (6) months;
- ~~(viii)~~ (iii) The amount owed is \$25 or less; or
- ~~(v)~~ (iv) The amount owed by the family exceeds \$3,000.

(A) If the amount owed by the family exceeds \$3,000, the family may pay to reduce the total amount owed to or below the \$3,000 cap in addition to the down payment.

## Reason for the Change to 16.6.B(3)(a) Record Retention

Language was added to clarify that unnecessary documents should be removed after three years of retention, and that this applies to “continued eligibility,” meaning “recertifications.” Therefore, staff only need to retain recertification documents from the last three recertification years.

## 16.6 RECORD KEEPING

\*\*\*

### 16.6.B RECORD RETENTION

- (3) SAHA must keep confidential records of all emergency transfers requested under SAHA’s Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period of time as specified in program regulations [24 CFR 5.2002(e)(12)].



- (a) SAHA will keep the last three recertification years of the Form HUD-50058 and supporting documentation, and for at least three years after the end of participation all documents related to a family's continued eligibility, tenancy, and termination.

## Summary of Revisions to FY2021-22 Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

### Contributions from SAHA Partners Not Counted As Income

#### **Reason for update to 6.1.K: “Periodic and Determinable Allowances”**

Language was added to 6.1.K(3)(f) to state that contributions provided to SAHA families by SAHA partners would not count toward a family’s income. The reason for this change is to allow assisted families access to contributions from community partners without financial burden. Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners such as regular payment of a family’s bills (e.g., utilities, telephone, rent, credit cards, and car payments), cash or other liquid assets, and “in-kind” contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.

This change is being proposed in the MTW Activity FY2022: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions.

#### **6.1.K PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]**

\*\*\*

##### **(3) Regular Contributions or Gifts**

\*\*\*

(f) SAHA will not include in income regular monetary or nonmonetary contributions or gifts provided by SAHA partners.

## **Administering Enhanced Vouchers**

### **Reason for update to 3.2.A: “Income Eligibility and Targeting” and 4.3.B: “Selection and HCV Funding Sources”**

Language was added to 3.2.A(3) to state that SAHA will be administering enhanced vouchers.

#### **3.2 BASIC ELIGIBILITY CRITERIA**

##### **3.2.A INCOME ELIGIBILITY AND TARGETING**

\*\*\*

(c) SAHA will administer enhanced vouchers for at-risk households in accordance with HUD requirements.

## **Decrease in Child Support Payments and Temporary Employment Income**

### **Reason for update to 11.2.C: “Changes Affecting Income or Expenses”**

Language was added to 11.2.C(4)(d)(vi) to specify that SAHA will not decrease income from child support payments and temporary employment until they have been decreased for three consecutive months. This language is being added to align /policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

#### **11.2.C CHANGES AFFECTING INCOME OR EXPENSES**

\*\*\*

##### **(4) Family-Initiated Interim Reexaminations**



\*\*\*

(d) **Optional Reporting**

\*\*\*

(vi) If a family declares that it has received a decrease in child support payments, SAHA will not decrease income until the family provides supporting documentation that payments have decreased for three consecutive months.

(A) Once documentation of decreased child support is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

(vii) SAHA will not decrease income from temporary job placements until the family provides evidence that payments have decreased for three consecutive months.

(A) Once documentation of decreased income from temporary job placements is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

## **Multiple Live-In Aides**

### **Reason for update to 3.1.M: “Live-in Aide”**

Language was updated to specify that SAHA may approve a family to have more than one live-in aide if it is determined to be a reasonable accommodation for a disability.

#### **3.1.M LIVE-IN AIDE**

\*\*\*

(7) SAHA will approve ~~a~~ one or more live-in aides if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. Approval of a live-in aide for reasonable accommodation will be in accordance with CFR 24 Part 8 and Chapter 2 of this Administrative Plan.

## **Reason for update to 5.1.C “Family Obligations”**

Language was added / inserted into 5.1.C(6)(p)(ii) to specify that SAHA may approve a family to have more than one live-in aide if it is determined to be a reasonable accommodation for a disability.

### **5.1.C FAMILY OBLIGATIONS**

\*\*\*

#### **(6) Family Obligations [24 CFR 982.551; Form HUD-52646, Voucher]**

\*\*\*

##### **(p) Obtain SAHA Approval for Residency of a Foster Child or Live-in Aide**

\*\*\*

(ii) SAHA will approve ~~a~~ one or more live-in aides if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. See Chapter 2 and § 3.1.M for more information.

## **Pregnancy and Adoption in Family Unit Size**

### **Reason for update to 5.2.B: “Determining Family Unit (Voucher) Size”**

Language was added to 5.2.B(4) to specify situations where anticipated children will be counted in the family voucher size; pregnancy will be counted upon submission of supporting documentation and adoptions will be counted after proof that the adoption is complete or awarded.

### **5.2.B DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]**

\*\*\*

(4) SAHA will assign one bedroom per two persons within the household, except in the following circumstances:

\*\*\*

- (e) All children anticipated to reside in a dwelling unit will be included in determining unit size upon submission of supporting documentation. For example, children expected to be born to pregnant women or children whose custody is being obtained by an adult.
- (f) Adopted children will be included in determining unit size when the family is able to submit supporting documentation that the adoption is complete or awarded.

## **Previous Terminations: Three-Year Versus Five-Year Offenses**

### **Reason for update to 3.3.C: “Mandatory Denial of Assistance”**

Language was added to 3.3.C(1)(a) and (b) to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.

The reason for this change is to make the HCV Program more accessible to our applicant families.

### **3.3.C MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a)]**

HUD requires SAHA to deny assistance in the following cases:

\*\*\*

- (a) SAHA will deny assistance to an applicant family if any member of the household has been evicted from federally assisted housing ~~in the last five (5) years~~ for drug-related criminal activity in accordance with SAHA's Screening Criteria Grid [see 3.3.E SAHA Criminal History Screening Policy].
- (b) SAHA will admit an otherwise eligible family who was evicted from federally-assisted housing ~~within the past five (5) years~~ for drug-related criminal activity, if SAHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by SAHA, or the person who committed the crime, is no longer living in the household.



## **Reason for update to 3.3.D “Other Permitted Reasons for Denial of Admission”**

Language was altered in 3.3.D(4)(a)(iii) and (iv) to clarify that SAHA will deny assistance for previous terminations (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior. This aligns with policy in place for SAHA’s Public Housing Program. The reason for this change is to make the HCV Program more accessible to our applicant families.

### **3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION**

\*\*\*

#### **(4) Previous Behavior in Assisted Housing [24 CFR 982.552(c)]**

\*\*\*

- (a) SAHA will deny assistance to an applicant family for the following reasons:
- (i) The family does not provide information that SAHA or HUD determines is necessary in the administration of the program.
  - (ii) The family does not provide complete and true information to SAHA.
  - (iii) Any family member has been evicted from federally-assisted housing in the last **three five** years.
  - (iv) Any PHA has terminated housing assistance for any member of the family in the past **three five** years.

## **Obtaining Verification: Bedrooms in Basements, Attics, or Converted Garage**

### **Reason for update to 8.1.B: “Additional Local Requirements”**

Language was added to 8.1.B(6)(h)(i) from previous policy (Admin Plan FY 2017-2018) to revert to allowing landlords an option to obtain verification of additional bedrooms through Bexar CAD or a licensed professional, versus requiring authorization only through Bexar CAD.

Rev. 03/03/21



## 8.1.B ADDITIONAL LOCAL REQUIREMENTS

\*\*\*

### (6) Clarifications of HUD Requirements

\*\*\*

#### (h) Bedrooms

- (i) Bedrooms in basements, attics or converted garages are not allowed unless the owner provides SAHA documentation from a licensed professional such as a licensed general contractor, building official, engineer or city inspector verifying that the room contains no safety hazards, or a Bexar County Appraisal District (Bexar CAD) print-out with the number of bedrooms for the unit.

## Informal Reviews Permitted for Expired Vouchers

### Reason for update to 16.3.B: “Informal Reviews”

Language was added to 16.3.B(3)(c) to state that SAHA will provide an informal review upon the denial of a voucher term extension or suspension. Even if SAHA is not required to by HUD to provide a review under this circumstance [24 CFR 982.555], permitting these informal reviews has often resulted in overturns and additional chances for the family. Language was removed that stated SAHA will only offer applicants the opportunity for an informal review when required by regulations.

## 16.3.B INFORMAL REVIEWS

\*\*\*

### (3) Decisions Subject to Informal Review

\*\*\*

- (c) In addition to the requirements outlined in 16.3.B(3)(a), SAHA will also offer applicants an opportunity for an informal review upon denial of voucher term extension or suspension. ~~only offer applicants the opportunity for an informal review when required by regulations [see 16.3.B(3)(a)].~~

## **Inspection Results Available on Landlord Portal**

### **Reason for update to 8.2.F: “Inspection Results and Reinspections for Units Under HAP Contract”**

Language was updated to reflect current practice that SAHA posts inspection results for the owner electronically to the Landlord Portal.

#### **8.2.F INSPECTION RESULTS AND REINSECTIONS FOR UNITS UNDER HAP CONTRACT**

##### **(1) Notification of Corrective Actions**

\*\*\*

- (i) ~~Within five business days of the completed inspection, SAHA will provide notification of the inspection results to the family via mail or email, and to the owner via SAHA’s Landlord Portal, mail or email. Generally, SAHA will send the owner and the family a written notification of the inspection results within five business days of the inspection.~~ The ~~written~~ notice will state:
  - (A) The time frame within which the failure must be corrected; and
  - (B) Failure to correct owner-caused deficiencies within the specified time frame (or any SAHA-approved extension period) will result in the termination of the owner’s HAP in accordance with 8.2.G; and/or
  - (C) Failure to correct family-caused deficiencies within the specified time frame (or any SAHA-approved extension period) will result in the termination of the family’s assistance in accordance with policies in Chapter 12.

## **Applicants with Previous Debts Owed**

### **Reason for update to 3.3.D “Other Permitted Reasons for Denial of Admission”**

Language was added to 3.3.D(4)(a)(vii) to specify that an applicant family may still be allowed onto the HCV program with previous debts owed to SAHA if they agree to enter into a repayment agreement upon admission to the program. This is only applicable to



debts owed to SAHA and no other public housing agency. The reason for this change is to make the HCV Program more accessible to our applicant families.

### **3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION**

\*\*\*

#### **(4) Previous Behavior in Assisted Housing [24 CFR 982.552(c)]**

\*\*\*

a) SAHA will deny assistance to an applicant family for the following reasons:

\*\*\*

(vii) The family owes rent or other amounts to SAHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family enters into a repayment agreement upon admission.

### **Reason for update to 16.5.B “Repayment Policy”**

Language was removed from 16.5.B(4)(b)(i) to align with the policy change above; being an applicant will not disqualify someone from establishing a repayment agreement.

### **16.5.B REPAYMENT POLICY**

\*\*\*

#### **(4) General Repayment Agreement Guidelines for Families**

\*\*\*

##### **(b) *No Offer of Repayment Agreement***

SAHA will not offer the family a repayment agreement when the following circumstances apply:

- ~~(i) The family is an applicant;~~
- (ii) The family has an existing repayment agreement with SAHA;
- (iii) SAHA determines that the family committed program fraud;

- (iiiiv) The amount owed by the family exceeds \$3,000; or
- (iv) The amount owed by the family is less than \$100.

## **Project-Based Voucher Program (PBV) Waitlist**

### **Reason for update to 18.6.C: “Organization of the Waiting List”**

Language was updated in 18.6.C(3) to establish a single waiting list for the PBV Program. While SAHA currently administers separate waiting lists for each PBV development, the consolidation will streamline waitlist management and reduce applicant wait times.

#### **18.6.C ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]**

\*\*\*

- (3) SAHA will establish and manage a separate waiting list for SAHA’s entire PBV program. ~~separate waiting lists for individual projects or buildings that are receiving PBV assistance. SAHA currently has waiting lists for the following PBV projects:~~
- ~~(a) Gardens of San Juan~~
  - ~~(b) Wheatley Park~~
  - ~~(c) East Meadows~~
  - ~~(d) Beacon Communities~~
  - (a) If a separate waiting list is required for any PBV developments, SAHA will maintain a separate waiting list in accordance with the development’s management agreement.

### **Reason for update to 18.6.D: “Selection from the Waiting List”**

Language was removed from 18.6.D(4)(i) to clarify that the St. Philip’s College Homeless Program is not being administered as a PBV program.

#### **18.6.D SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]**



\*\*\*

**(4) Preferences [24 CFR 983.251(d)]**

\*\*\*

\*\*\*

- (i) ~~St. Philip's College Homeless Program Referral — Homeless students referred by St. Philip's College will receive a voucher for Beacon Communities.~~

**Rental Assistance Demonstration (RAD) Conversion**

**Reason for update to 19.3.A: "Moderate Rehabilitation"**

Language was added to 19.3.A to allow SAHA to assist Mod-Rehab partners in converting to Rental Assistance Demonstration (RAD) if they express interest to SAHA.

**19.3.A MODERATE REHABILITATION (MOD-REHAB)**

\*\*\*

\*\*\*

- (9) If any owner of a Mod-Rehab property expresses interest in converting housing assistance under HUD's Rental Assistance Demonstration (RAD) program, SAHA will work directly with the owner as needed to provide information and facilitate the conversion.

## **APPENDIX D: PROPOSED FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

Appendix D contains the Agency's implementation policies for the Family Self-Sufficiency Program.



## **ACTION PLAN FOR THE FAMILY SELF-SUFFICIENCY PROGRAM**

<b>Revision Date</b>	<b>Section(s)</b>
07/01/2021	N/A

Approved by the Board of Commissioners on \_\_\_\_\_, 2021.



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## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 1**

## **OVERVIEW OF THE PROGRAM AND PLAN**

## **CHAPTER 1: THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND THE FSS ACTION PLAN**

This chapter provides an overview of the Family Self-Sufficiency (FSS) program and FSS Action Plan, including the purpose, organization, and required contents of the FSS Action Plan.

There are three parts to this chapter:

**PART 1: The Family Self-Sufficiency (FSS) Program and the FSS Action Plan**

This part provides an overview of the family self-sufficiency program and the purpose of the FSS Action Plan.

**PART 2: Requirements of the FSS Action Plan**

This part covers Action Plan requirements, including development, revision, and contents of the Action Plan. It also contains information on family demographics, which is part of the required contents of the action plan.

**PART 3: The Moving to Work (MTW) Plan**

This part discusses the authorizations and obligations of the San Antonio Housing Authority (SAHA) under its Moving to Work agreement with HUD.

## **1.1 THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM AND FSS ACTION PLAN**

### **1.1.A. OVERVIEW OF THE FAMILY SELF-SUFFICIENCY PROGRAM**

The origins of the FSS program are in two pilot projects implemented in 1986 and 1990, Project Self-Sufficiency and Operation Bootstrap, respectively. These projects were set up to test self-sufficiency programs for families with housing subsidies, and both demonstrated that families needed essential services in order to move toward economic self-sufficiency. These services include child care, transportation, medical care, and long-term education and training.

In the wake of the successful demonstration of these projects, family self-sufficiency became one of the initiatives under the Homeownership and Housing Opportunities for People Everywhere (HOPE) program enacted in 1990, and the FSS program was subsequently created under the National Affordable Housing Act the same year.

FSS built upon and refined both Project Self-Sufficiency and the bootstrap program. It remained a voluntary program in 1991 and 1992, but became mandatory in 1993 for any new increments of funding issued to PHAs. The 1993 regulations were further modified by the Quality Housing and Work Responsibility Act of 1998 (QHWRA).

The purpose of the FSS program is to coordinate housing assistance with public and private resources to enable assisted families to achieve economic self-sufficiency. The purpose and basic requirements of the FSS program are further elaborated upon in Chapter 2.

This family self-sufficiency program is administered by the San Antonio Housing Authority for the jurisdiction of the City of San Antonio and County of Bexar.

### **1.1.B. APPLICABLE REGULATIONS**

Applicable regulations for public housing and HCV FSS programs include:

- (1) 24 CFR Part 5: General Program Requirements
- (2) 24 CFR Part 8: Nondiscrimination
- (3) 24 CFR Part 902: Public Housing Assessment System
- (4) 24 CFR Part 903: Public Housing Agency Plans
- (5) 24 CFR Part 945: Designated Housing
- (6) 24 CFR Part 960: Public Housing Admission and Occupancy Policies
- (7) 24 CFR Part 965: PHA-Owned or Leased Projects—General Provisions
- (8) 24 CFR Part 966: Public Housing Lease and Grievance Procedures
- (9) 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- (10) 24 CFR Part 984: Section 8 and Public Housing Family Self-Sufficiency Program

### **1.1.C. THE FAMILY SELF-SUFFICIENCY ACTION PLAN**

The Family Self-Sufficiency (FSS) Action Plan is required by HUD. The purpose of the FSS Action Plan is to establish policies for carrying out the family self-sufficiency program in a manner consistent with HUD requirements and local goals and objectives contained in SAHA's Agency Plan. This FSS Action Plan is a supporting document to the SAHA Agency Plan, and is available for public review as required by 24 CFR Part 903.

This family self-sufficiency Action Plan is set forth to define SAHA's local policies for operation of the program in the context of federal laws and regulations. All issues related to FSS not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this FSS Action Plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

SAHA is responsible for complying with all changes in HUD regulations pertaining to the FSS program. If such changes conflict with this plan, HUD regulations will take precedence.

Administration of the FSS program and the functions and responsibilities of SAHA staff shall be in compliance with SAHA's personnel policy and HUD's family self-sufficiency regulations, as well as all public housing and HCV regulations, in addition to federal, state, and local fair housing laws and regulations.

## PART 2: REQUIREMENTS OF THE FSS ACTION PLAN

### 1.2.A. OVERVIEW

- (1) SAHA must have a HUD-approved Action Plan before implementing an FSS program, regardless of whether the FSS program is a mandatory or voluntary program. Further, this Action Plan must comply with the requirements specified for the plan in the regulations [24 CFR 984.201(a)].
- (2) The regulatory requirements dealing specifically with the FSS Action Plan itself largely involve the development, revision, and required contents of the Action Plan. This part covers those requirements.

### 1.2.B. HUD APPROACH TO POLICY DEVELOPMENT

- (1) In developing policy for the FSS Action Plan, SAHA needs to be aware of the distinction HUD makes between mandatory and discretionary policies.
  - (a) **Mandatory policies** are those driven by legislation, regulations, current handbooks, notices, and legal opinions.
  - (b) **Discretionary policies** consist of those developed for areas in which SAHA has regulatory discretion, or with regard to optional, nonbinding guidance including guidebooks, notices that have expired, and recommendations from individual HUD staff.
- (2) HUD expects SAHA to develop policies and procedures that are consistent with mandatory regulations and to make clear the optional policies SAHA has adopted. SAHA's FSS Action Plan is the foundation of those policies and procedures for the FSS program. HUD's directions require SAHA to make policy choices that provide guidance to staff and consistency to program applicants and participants.
- (3) Following HUD guidance, even though it is not mandatory, provides SAHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If SAHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but public housing agencies should carefully consider those decisions.

## **1.2.C. FSS ACTION PLAN DEVELOPMENT AND REVISION**

### **(1) Development of Action Plan [24 CFR 984.201(b) and (c)]**

- (a) When developing an FSS Action Plan, a PHA must do so in consultation with the chief executive officer of the applicable unit of general local government and the program coordinating committee (PCC).
- (b) In addition, a PHA that is establishing its FSS program must submit an Action Plan to HUD for approval within 90 days after SAHA receives notice from HUD of approval of SAHA's application for funding that establishes the obligation to operate an FSS program. This deadline is required unless the dates are extended by HUD for good cause.
- (c) For voluntary FSS programs, SAHA must submit its Action Plan and obtain HUD approval of the plan before it can implement the FSS program. This includes a voluntary program established because SAHA chose to implement an FSS program that exceeds the minimum size for a mandatory program (see Section 2-II.A. for a discussion of mandatory versus voluntary FSS programs).

### **(2) Single Action Plan [24 CFR 984.201(f)]**

- (a) PHAs implementing both a Housing Choice Voucher ("HCV" or "Section 8") FSS program and a Public or Indian Housing FSS program may submit one Action Plan. In cases where SAHA decides to submit one plan for more than one program, the policies contained in the Action Plan would apply to both programs.

(3) SAHA is implementing both an HCV FSS program and a public housing FSS program and will submit one Action Plan, which will contain policies that apply to both programs.

### **(4) Revision to the FSS Action Plan [24 CFR 984.201(c)(2)]**

- (a) Following HUD's initial approval of the Action Plan, no further approval of the Action Plan is required unless SAHA proposes to make policy changes to the Action Plan or increase the size of a voluntary program, or to revise the FSS Action Plan as needed to comply with changes in HUD regulations. SAHA must submit any changes to the Action Plan to HUD for approval.

- (b) SAHA will review and update the Action Plan at least once a year, and more often if needed, to reflect changes in regulations, SAHA operations or when needed to ensure staff consistency in operation.

#### **1.2.D. CONTENTS OF THE PLAN [24CFR 984.201(d)]**

- (1) HUD regulations state that there are several components that must be included in the FSS Action Plan. At a minimum, the Action Plan must cover the policies and procedures of SAHA for operation of a local FSS program as follows:
  - (a) Family demographics, including a description of the number, size, characteristics, and other demographics such as racial and ethnic data, in addition to the supportive service needs of the families expected to participate in the program. (Chapter 1)
  - (b) Estimate of participating families, which means the number of families which can reasonably be expected to receive supportive services under the FSS program. (Chapter 2)
  - (c) Eligible families from any other local self-sufficiency program who are expected to agree to executing an FSS contract of participation. (Chapter 2)
  - (d) A statement of SAHA's FSS family selection procedures, including a description of how the procedures ensure that families are selected without regard to race, color, religion, disability, sex, familial status or national origin. (Chapter 4)
  - (e) A description of the incentives that SAHA intends to offer to families to encourage participation in the FSS program (an incentives plan), including the establishment of the escrow account. (Chapter 4)
  - (f) Outreach efforts, which include a description of SAHA's efforts to recruit eligible families, the actions SAHA will take to ensure that both minority and nonminority groups are informed about the FSS program and how SAHA will make this information known. (Chapter 4)
  - (g) A description of the FSS activities and supportive services to be provided by both public and private resources to FSS families and identification of these public and private resources. (Chapter 4)
  - (h) A description of SAHA's method for identifying family support needs, including how SAHA will identify the needs and deliver the services. (Chapter 4)

- (i) A description of SAHA's policies regarding program termination or withholding of services on the basis of a family's failure to comply with the FSS contract, and available grievance procedures. (Chapter 5)
- (j) Assurances of noninterference with rights of non-participating families which state that a family's election to not participate in the FSS program will not affect the family's admission to the public housing or HCV program, nor will it affect their right to occupancy in accordance with its lease. (Chapter 4)



- (k) Timetable for program implementation, including the schedule for filling FSS slots with eligible families. (Chapter 2)
- (l) Certification of coordination, which is a certification that the development of services and activities under the FSS program has been coordinated with the Workforce Investment Act (formerly JTPA), Workforce Investment Board and One Stop Centers (formerly JOBS program), and any other relevant employment, child care, transportation, training, and education programs in the applicable area, and that implementation will continue to be coordinated, in order to avoid duplication of services and activities. (Chapter 4)
- (m) Optional additional information, which involves such other information that would help HUD determine the soundness of SAHA's proposed FSS program. (All Chapters)

### **1.2.E ORGANIZATION OF THE PLAN**

- (1) The FSS Action Plan is organized to provide information to users in particular areas of operation.

(2) SAHA policies are provided in pink text boxes.

(3) SAHA's Moving To Work (MTW) policies (see Section 1.4) are provided in green text boxes.

### 1.2.E. FAMILY DEMOGRAPHICS [24 CFR 984.201(d)(1)]

- (1) As part of the required contents of the FSS Action Plan, family demographics of the housing choice voucher and public housing program participants serve to provide a description of the number, size, characteristics, and other descriptive data (including racial and ethnic data of those participants).
- (2) These data may later be used to help the housing authority and the program coordinating committee (PCC) to identify supportive service needs of the families expected to participate in the FSS program.

<b>Housing Choice Voucher/ Public Housing</b>	<b>Total Families</b>	<b>Percent of Total</b>
<b>All Families</b>		
Single	12,224	93.5%
Female HOH	10,581	80.9%
Male HOH	2,493	19.1%
<b>Race/Ethnicity</b>		
Hispanic or Latino	8,843	67.7%
Not Hispanic or Latino/White	1,213	9.2%
Not Hispanic or Latino/Black/African American	2,956	22.7%
Not Hispanic or Latino/Asian	30	.2%
Not Hispanic or Latino/Other	32	.2%
<b>Income</b>		
Extremely Low-Income	11,073	84.7%
Very Low-Income	1,644	12.6%
Low-Income	345	2.6%
HOH Income from Wages	3,410	26%
HOH Income from SSI	5,278	40.3%
Other Member Income from SSI	533	4.1%
<b>Total Number of Family Members</b>		
1-2	7,311	55.9%
3-5	4,927	37.7%
6 or more	836	6.4%
<b>Persons with Disabilities</b>		
HOH Person w/ Disabilities (HUD)	4,027	30.9%

### **1.3 MOVING TO WORK PLAN**

#### **1.4.A OVERVIEW**

- (1) SAHA is a Moving to Work (MTW) demonstration site. MTW is a demonstration program for public housing authorities that provides the opportunity to design and test innovative, locally designed strategies that:
  - (a) Use federal dollars more efficiently;
  - (b) Help residents find employment and become self-sufficient; or
  - (c) Increase housing choices for low-income families.
- (2) MTW gives SAHA exemptions from many existing public housing regulatory rules and more flexibility with how the agency uses its federal funds.
- (3) As an MTW demonstration site, SAHA is expected to use the opportunities presented by MTW to inform HUD about ways to better address local community needs.

#### **1.4.B Moving to Work Agreement and Activities**

- (1) SAHA's MTW authorizations and administrative responsibilities are provided in the Amended and Restated Moving to Work Agreement entered into on August 20, 2019, by and between HUD and SAHA. Pursuant to the Agreement, SAHA will include any new MTW initiatives in an Annual MTW Plan and have the Plan approved by HUD prior to implementation. SAHA will also prepare and submit to HUD an Annual MTW Report, which compares the performance of SAHA's activities with its Annual MTW Plan.
- (2) SAHA's implemented MTW activities are incorporated in each applicable section of this ACOP. A complete list of MTW activities is provided in Exhibit 1-1.

## EXHIBIT 1-1: HUD-APPROVED SAHA MTW ACTIVITIES

The following is a complete list of SAHA's applicable MTW activities that have been approved by HUD:

Activity	Title	Description
FY2014-2	Early Engagement	Requires applicants to complete a defined set of courses upon admission to the program. Elderly and disabled heads of household are exempt from this requirement.
FY2019-2	Alternate Recertification Process	SAHA conducts biennial reexaminations for all non-elderly/non-disabled participant households, and triennial reexaminations for elderly or disabled households receiving 100% of their income from fixed sources. Consolidates and updates FY2014-4 and FY2016-2.
FY2020-3	Family Self-Sufficiency (FSS) Program Streamlining	Modifies FSS contract to be consistent with future alternative rent policies like the FY2014-6 Rent Simplification MTW activity. Eliminates the 120 day rule requiring an interim or annual recertification if one has not been conducted within 120 days of FSS enrollment.

**\*Subject to change as determined by MTW Plan revision and HUD approval.**



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 2**

## **PURPOSE, SCOPE AND APPLICABILITY OF THE FSS PROGRAM**

## **CHAPTER 2: PURPOSE, SCOPE AND APPLICABILITY OF THE FSS PROGRAM**

This chapter contains information about the FSS program's purpose, size and measurable objectives, as well as information on program operation. This includes potential participant demographics, the program timetable, the number of families to be served and the size of SAHA's voluntary FSS program. This chapter also contains definitions of the key terms in this FSS Action Plan.

This chapter contains four parts:

### **PART 1: The Purpose and Basic Requirements of the FSS Program**

This part includes a description of the purpose of the FSS program on a national level, which includes the program's intent, goal and major strategies.

### **PART 2: The Scope of the FSS Program**

This part contains information about the size of SAHA's FSS program, an estimate of participating families, eligible families from other self-sufficiency programs and eligibility for combined FSS programs..

### **PART 3: Program Operation**

This part specifies the requirements for FSS program operation, including the deadlines for program start-up and when SAHA is expected to have attained full enrollment.

### **PART 4: The Definitions of Terms Used in SAHA's FSS program**

This section contains both HUD and PHA definitions for terms used in this policy document.

## 2.1 PURPOSE AND BASIC REQUIREMENTS OF THE FSS PROGRAM

### 2.1.A. PURPOSE

- (1) The purpose of the Family Self-Sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of public housing assistance and housing assistance under the Housing Choice Voucher (HCV) program with public and private resources enabling families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency [984.101(a)(1)].
- (2) In addition to this broader national goal of the FSS program, SAHA also establishes a local goal consistent with SAHA's mission statement to serve as a guide for establishing policy and implementing the FSS program.
- (3) SAHA's goal in operating its FSS program is to match housing-assisted families with a broad range of highly collaborative, existing community services, which will assist FSS families and individuals in achieving economic self-sufficiency.
  - (a) **Economic self-sufficiency** is defined as having the sustainable skills, training and education necessary to secure and maintain employment paying sufficient income to consistently meet the family's basic needs with no or minimal use of financial assistance from public or private organizations.

### 2.1.B PROGRAM OBJECTIVES [24 CFR 984.102]

- (1) In order to reach the FSS national program goal, HUD has defined its FSS program objective as to reduce the dependency of low-income families on welfare assistance and on HCV ("Section 8"), public, or any federal, state, or local rent or homeownership subsidies.
- (2) Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance while living in assisted housing so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency.
- (3) As with the goals of the program, FSS program objectives are defined on the national level through FSS regulation, and on the local level by SAHA policy.
- (4) On the local level, SAHA will achieve this national program objective by offering qualifying low-income families a broad range of services, which

have been made available in part through the Program Coordinating Committee (PCC).

- (5) These services will provide long-term education, job training, counseling and other forms of social service assistance so that families may achieve economic self-sufficiency, as defined in Section 2.1.A of this Action Plan.

### **2.1.C BASIC REQUIREMENTS OF THE FSS PROGRAM [24 CFR 984.104]**

- (1) An FSS program established under 24 CFR Part 984 must operate in conformity with the regulations and this FSS Action Plan (as required in 24 CFR 984.201), provide comprehensive supportive services (as defined in 24 CFR 984.103) and operate in compliance with nondiscrimination and equal opportunity requirements.



## 2.2 SCOPE OF THE FSS PROGRAM

### 2.2.A PUBLIC HOUSING AGENCIES REQUIRED TO OPERATE AN FSS PROGRAM

- (1) Each PHA that received funding for public housing units under the FY 1991 and FY 1992 FSS incentive award competitions must operate a public housing FSS program.
- (2) Each PHA that received funding for Section 8 rental certificates or vouchers under the combined FY 1991/1992 FSS Incentive Award Competition also must operate a Section 8 FSS program.
- (3) In addition, unless the PHA receives an exemption under 24 CFR 984.105, each PHA for which HUD reserved funding (budget authority) for additional rental certificates or vouchers in FY 1993 through October 20, 1998, must operate a Section 8 FSS program.
- (4) Each PHA for which HUD reserved funding (budget authority) to acquire or construct additional public housing units in FY 1993 through October 20, 1998, must operate a public housing FSS program as well.
- (5) **Mandatory Minimum Program Size (MMPS) [24 CFR 984.105]**

PHAs that must operate an FSS program under 24 CFR 984.101 are subject to a minimum program size requirement.

- (a) In public housing, a PHA's FSS program minimum program size is determined by adding the total number of public housing units reserved in FY 1991 and FY 1992 under the FSS incentive award competitions to the number of public housing units reserved in FY 1993 through October 20, 1998, and subtracting the number of families that have graduated from the PHA's public housing FSS program on or after October 21, 1998, by fulfilling their FSS contract of participation obligations.
- (b) In the Housing Choice Voucher (HCV) program, a PHA's FSS program minimum program size is determined by adding the number of HCV program units reserved under the combined FY 1991/1992 FSS incentive award competition to the number of additional rental voucher units reserved in FY 1993 through October 20, 1998, (not including the renewal of funding for units previously reserved) then subtracting the units that are excluded from minimum program size and subtracting the number of families who have graduated from the PHA's Section 8 FSS program on or after October 21, 1998, by fulfilling their contract of participation obligations.

- (c) Further, when determining the Section 8 FSS program size for funding reserved in FY 1993 through October 20, 1998, the PHA must exclude funding for families affected by the following:
- Termination, expiration, or owner opt-out under Section 8 project-based programs;
  - Funding for families affected by demolition or disposition of a public housing project or replacement of a public housing project;
  - Funding for families affected by conversion of assistance from the Section 23 leased housing or housing assistance payments programs to the HCV program;
  - Funding for families affected by the sale of a HUD-owned project; and
  - Funding for families affected by the prepayment of a mortgage or voluntary termination of mortgage insurance.

(d) SAHA has no mandatory minimum program size requirement and operates a voluntary FSS program.

**(6) Maintaining Mandatory Minimum Program Size**

- (a) Although the discretion to do so ultimately rests with the PHA required to operate a mandatory FSS program, mandatory minimum program size can decrease as FSS participants graduate.
- (b) Per the regulation, for each family that graduates from the program by fulfilling its FSS contract of participation on or after October 21, 1998, the mandatory minimum program size for a PHA's public housing or housing choice voucher FSS program is reduced by one slot.
- (c) However, If an FSS slot is vacated by a family that has not completed its FSS contract of participation obligations, the slot must be filled by a replacement family which has been selected in accordance with the FSS family selection procedures [24 CFR 984.105(b)(3)].

(d) SAHA has no mandatory minimum program size and operates a voluntary FSS program.

**(7) Option to Operate Larger FSS Program**

- (a) A PHA may choose to operate an FSS program of a larger size than the minimum required by HUD [24 CFR 984.105(a)(3)].

- (b) SAHA has no mandatory minimum program size and operates a voluntary FSS program.

**(8) Exception to Program Operation [24 CFR 984.105(c)]**

- (a) The requirement to establish and carry out a public housing or a HCV FSS program may be waived with approval from HUD.
- (b) In order to waive the requirement, the PHA must provide a certification to HUD that the establishment and operation of an FSS program is not feasible because of a lack of accessible supportive services funding, including lack of the availability of programs under JTPA or JOBS; a lack of funding for reasonable administrative costs; a lack of cooperation by other units of state or local government; or a lack of interest in participating in the FSS program on the part of eligible families.
- (c) An exception will not be granted if HUD determines that local circumstances do not preclude the PHA from effectively operating an FSS program that is smaller than the minimum program size.

- (d) This section is not applicable, as SAHA has no mandatory minimum program size requirement and operates a voluntary FSS program.

**(9) Reduction in Program Size**

- (a) Rather than a full exception to program operation, a PHA may also be permitted to operate a public housing or an HCV FSS program that is smaller than the minimum program size. As with the full exception, HUD may grant the PHA such a partial exception if the PHA provides to HUD a certification that the operation of an FSS program of the minimum program size is not feasible because of a decrease in or lack of accessible supportive services [24 CFR 984.105(d)].

- (b) This section is not applicable, as SAHA has no mandatory minimum program size requirement and operates a voluntary FSS program.

(10) **Expiration of Exception**

- (a) The approval for a full or partial exception to the FSS minimum program size requirement expires three years from the date of HUD approval of the exception.
- (b) If a PHA seeks to continue an exception after its expiration, the PHA must submit a new request and a new certification to HUD for consideration [24 CFR 984.105(e)].

- (c) This section is not applicable, as SAHA has no mandatory minimum program size requirement and operates a voluntary FSS program.

**2.2.B ESTIMATE OF PARTICIPATING FAMILIES [24 CFR 984.201(d)(2)]**

- (1) The PHA must state the number of eligible FSS families who can reasonably be expected to receive supportive services under the FSS program based on available and anticipated federal, tribal, state, local and private resources.

(2) **SAHA Estimate of Families Eligible for FSS**

SAHA estimates that approximately 1,275 households can reasonably be expected to meet FSS program criteria and receive supportive services under SAHA's FSS programs.

- (a) This estimate is based on internal and community statistical information, as well as available and anticipated federal, tribal, state, local and private resources.

**2.2.C ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS [24 CFR 984.201(d)(3)]**

- (1) If applicable, SAHA must enter the number of families, by program type, who are participating in any other local housing self-sufficiency program who are expected to agree to execute an FSS contract of participation.

- (2) Subject to grant funding and availability, SAHA estimates that 200 Public Housing households enrolled in other SAHA self-sufficiency programs will also agree to and execute an FSS contract of participation.

(a) **SAHA Public Housing Jobs Plus Programs**

- (i) This estimate includes households from former Jobs Plus Program participants who reside(d) at Cassiano Homes.
  - (ii) This figure also includes an estimate of new Jobs Plus Program participants who may enroll at Lincoln Heights Courts and also execute an FSS contract.
- (b) The estimate in 2.2.C (2) is based on internal and community statistical information, as well as available and anticipated federal, tribal, state, local and private resources.

#### **2.2.D ELIGIBILITY OF A COMBINED PROGRAM [24 CFR 984.201(e)]**

- (1) A PHA that wishes to operate a joint FSS program with other PHAs may combine its resources with one or more PHAs to deliver supportive services under a “Joint Action Plan” that will provide for the establishment and operation of a combined FSS program that meets the requirements of this part.

- (c) SAHA does not operate a combined or joint FSS program.

## 2.3 PROGRAM OPERATION

### 2.3.A OVERVIEW

- (1) Federal regulations specify requirements for FSS program operation regarding deadlines for program start-up and when SAHA is expected to have attained full enrollment.
- (2) A timetable illustrating when SAHA intends to meet these deadlines is included as part of the required contents of the Action Plan.

### 2.3.B PROGRAM IMPLEMENTATION DEADLINE

- (1) The deadlines for program implementation differ depending on whether the FSS program is voluntary or mandatory.
- (2) **Voluntary Program [24 CFR 984.301(a)(1)]**
  - (a) There is no deadline for implementation of a voluntary program.
  - (b) However, a voluntary program may not be implemented before the requirements specified in 24 CFR 984.201 have been satisfied. See Sections 1.2.A through 1.2.D for additional information.
- (3) **Mandatory Program [24 CFR 984.301(a)(2)]**
  - (a) For mandatory FSS programs, operation of a local FSS program must begin within 12 months of HUD's approval of funding that establishes the obligation to operate an FSS program.
    - (i) **Operation** means that activities such as outreach, participant selection and enrollment have begun.
  - (c) Full delivery of the supportive services to be provided to the total number of families required to be served under the program need not occur within this 12 months, but must occur within two years (see Section 2.3.C).

### 2.3.C FULL ENROLLMENT AND DELIVERY OF SERVICE [24 CFR 984.301(a)(2)(ii)]

- (1) Unless the PHA is implementing a voluntary FSS program, the PHA must have completed enrollment of the total number of families required to be served under the program (based on the minimum program size), and must have begun delivery of the supportive services within two years from the date of notification of approval of the application for *new public housing units* for a public housing FSS program, *new rental certificates or rental vouchers* for a Section 8 FSS program, or HUD's approval of funding that establishes the obligation to operate an FSS program.

### **2.3.D EXTENSION OF PROGRAM DEADLINES FOR GOOD CAUSE [24 CFR 984.301(a)(2)(iii)]**

- (1) HUD may extend the deadline for program implementation if the PHA requests an extension and HUD determines that despite best efforts on the part of the PHA, the development of new public housing units will not occur within the required deadlines, the commitment by public or private resources to deliver supportive services has been withdrawn, the delivery of such services has been delayed, or other local circumstances warrant an extension of the required deadlines.

- (2) SAHA implemented its FSS program in 1997, and met all previous timetable deadlines and requirements for program implementation.

### **2.3.E TIMETABLE FOR PROGRAM IMPLEMENTATION [24 CFR 984.201(d)(ii)]**

- (1) A timetable for implementation of the FSS program is part of the required contents of the FSS Action Plan. The timetable must comply with the requirements in 24 CFR 984.301 (see Sections 2.3.B - 2-3.D,) including the schedule for filling FSS slots with eligible FSS families.

- (2) SAHA implemented its FSS program in 1997, and met all previous timetable deadlines and requirements for program implementation.

## 2.4 DEFINITIONS

### 2.4.A DEFINITIONS [24 CFR 984.103]

- (1) The terms **1937 Act**, **fair market rent**, **HUD**, **low-income family**, **public housing**, **public housing agency (PHA)**, **secretary** and **Section 8**, as used in this document, are defined in the 24 CFR Part 5.
- (2) The term **very low-income family** is defined in 24 CFR 813.102 and 24 CFR 913.102.
- (3) The terms used in this document have the following definitions as defined by 24 CFR 984.103 and this Family Self-Sufficiency (FSS) Action Plan.
- (4) **Certification** means a written assertion based on supporting evidence, provided by the FSS family or SAHA, which must be maintained by SAHA in the case of the family's certification, or by HUD in the case of SAHA's certification. The certification must be made available for inspection by HUD, SAHA and the public, as appropriate, and be deemed to be accurate, unless the secretary or SAHA determines otherwise after inspecting the evidence and providing due notice and opportunity for comment.
- (5) **Chief executive officer (CEO)** means the CEO of a unit of general local government who is the elected official or the legally designated official having primary responsibility for the conduct of that entity's governmental affairs.
- (6) **Contract of participation (COP or "FSS contract")** means a contract in a form approved by HUD, entered into between a participating family and SAHA.
  - (a) The FSS contract sets forth the terms and conditions governing participation in the FSS program.
  - (b) The contract of participation includes all individual training and services plans entered into between the PHA and all members of the family who will participate in the FSS program, and which plans are attached to the contract of participation as exhibits.
  - (c) For additional details, see 24 CFR 984.303.
- (7) **Earned income** means income or earnings included in annual income from wages, tips, salaries, other employee compensation and self-employment.
  - (a) Earned income does not include any pension or annuity, transfer payments, any cash or in-kind benefits or funds deposited in or accrued interest on the FSS escrow account established by SAHA on behalf of a participating family.



- (8) **Effective date of contract of participation** means the first day of the month following the month in which the FSS family and SAHA entered into the contract of participation.
- (9) **Eligible families** for the public housing FSS program means current residents of public housing, and for the Housing Choice Voucher (HCV) FSS program, means current HCV program participants.
  - (a) Eligible families also include current residents of public housing and HCV participants who participate in other local self-sufficiency programs.
- (10) **Enrollment** means the date that the FSS family entered into the contract of participation with SAHA.
- (11) **Family Self-Sufficiency program** or **FSS program** means the program established by SAHA within its jurisdiction to promote self-sufficiency among participating families, including the provision of supportive services to these families, as authorized by section 23 of the 1937 Act.
- (12) **FSS account** means the FSS escrow account authorized by section 23 of the 1937 Act.
- (13) **FSS credit** means the amount credited by SAHA to the participating family's FSS account.
- (14) **FSS family or participating family** means a family that resides in public housing or receives assistance under the rental voucher programs that elects to participate in the FSS program and whose designated head of household has signed the contract of participation.
- (15) **FSS-related service program** means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of **supportive services**.
- (16) **FSS slots** refer to the total number of public housing units or the total number of rental vouchers that comprise the minimum size of SAHA's respective public housing FSS program or HCV FSS program.
- (17) **FY** means federal fiscal year (starting with October 1, and ending September 30, and designated by the calendar year in which it ends).
- (18) **Head of FSS family** means the adult member of the FSS family who is the head of the household for purposes of determining income eligibility and rent.
- (19) **Housing subsidies** means assistance to meet the costs and expenses of temporary shelter, rental housing, or homeownership, including rent, mortgage or utility payments.
- (20) **HUD** means the Department of Housing and Urban Development.

- (20) **Individual Training and Services Plan (ITSP)** means a written plan that is prepared for the head of the FSS family and each adult member of the FSS family who elects to participate in the FSS program, by SAHA in consultation with the family member; and which sets forth the supportive services to be provided to the family member, the activities to be completed by that family member, and the agreed upon completion dates for the services and activities.
- (a) Each ITSP must be signed by SAHA and the participating family member, and is attached to and incorporated as part of the contract of participation.
- (b) An ITSP must be prepared for the head of the FSS family.
- (21) **JTPA** means the Job Training Partnership Act (29 U.S.C. 1579(a)), which was also previously known as the Workforce Investment Act or WIA. The JTPA and WIA provisions are now located in the Workforce Innovation and Opportunity Act or WIOA.
- (22) **Knowledgeable professional**

- (a) **Knowledgeable professional** means a person who is knowledgeable about the situation, competent to render a professional opinion and is not in a position to gain, monetarily or otherwise, from SAHA's FSS program decision in the area to which they are certifying.
- (i) For more information on how the term is defined within the HCV program, please see Chapters 2 and 3 of the Administrative Plan.
- (ii) For more information on how the term is defined within public housing, please see Chapters 2, 3 and 7 of the Admissions and Coordinated Occupancy Policy (ACOP).

- (23) **Participating family** is defined as **FSS family** in this section.
- (24) **Program Coordinating Committee (PCC)** means the committee described in 24 CFR 984.202.
- (25) **Public housing** means housing assisted under the 1937 Act, excluding housing assisted under Section 8 of the 1937 Act.

- (26) **Self-sufficiency** means that an FSS family is no longer receiving Section 8, public, or Indian housing assistance, or any federal, state, or local rent or homeownership subsidies or welfare assistance.
- (a) Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS account funds.
- (27) **Supportive services** means those appropriate services that SAHA will make available or cause to be made available to an FSS family under a contract of participation. These services may include:
- (a) child care of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- (b) transportation necessary to enable a participating family to receive available services or to commute to their places of employment;
- (c) remedial education;
- (d) education for completion of secondary or post-secondary schooling;
- (e) job training, preparation, and counseling;
- (f) job development and placement, as well as follow-up assistance after job placement and completion of the contract of participation;
- (g) substance/alcohol abuse treatment and counseling;
- (h) training in homemaking and parenting skills;
- (i) household management;
- (j) money management;
- (k) counseling regarding homeownership or opportunities available for affordable rental and homeownership in the private housing market (including information on an individual's rights under the Fair Housing Act) and money management, as provided by a HUD Certified Housing Counselor; and
- (l) any other services and resources, including case management and reasonable accommodations for individuals with disabilities, that SAHA may determine to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency.
- (28) **Unit size** or **size of unit** refers to the number of bedrooms in a dwelling unit.
- (29) **Welfare assistance** means (for purposes of the FSS program only) income assistance from federal or state welfare programs and includes only cash maintenance payments designed to meet a family's ongoing basic needs.

- (a) Welfare assistance does not include non-recurrent, short-term benefits that are designed to deal with a specific crisis situation or episode of need, or are not intended to meet recurrent or ongoing needs and will not extend beyond four months; work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training); supportive services such as child care and transportation provided to families who are employed; refundable earned income tax credits; contributions to, and distributions from, individual development accounts under TANF; services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment-related services that do not provide basic income support; transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of the Social Security Act, to an individual who is not otherwise receiving assistance; amounts solely directed to meeting housing expenses; amounts for health care; food stamps and emergency rental and utilities assistance; and SSI, SSDI, or social security.



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 3**

## **PROGRAM ADMINISTRATION**

## **CHAPTER 3: PROGRAM ADMINISTRATION**

This chapter discusses administrative policies and practices as they are relevant to the activities covered in this plan.

The policies and practices are discussed in two parts:

### **PART 1: Staffing, Fees and Costs, and On-Site Facilities**

This part describes identifying appropriate staff and contractors to operate the FSS program and provide the necessary direct services to FSS families. In addition, it describes how administrative fees, costs, and supportive services will be funded, and defines the use of on-site facilities.

### **PART 2: The Program Coordinating Committee**

This part covers the establishment of a program coordinating committee (PCC), which is a regulatory requirement for the FSS program. It describes required and recommended PCC membership, in addition to the option for an alternative committee.

## **3.1 STAFFING, FEES AND COSTS, AND ON-SITE FACILITIES**

### **3.1.A OVERVIEW**

- (1) Several functions of program administration are crucial to running an FSS program.
- (2) SAHA may need to employ a program coordinator, or decide to contract with another organization to administer the program.
- (3) In addition to staffing issues, PHAs should understand how program funding and expenses work in order to keep the program running smoothly.
- (4) Finally, PHAs need to sort out whether and how to make common areas or unoccupied units to provide supportive services.

### **3.1.B PROGRAM ADMINISTRATION STAFF AND CONTRACTORS [24 CFR 984.301(b)]**

- (1) PHAs have the choice between hiring their own staff and contracting with an outside organization to administer their FSS program.
- (2) If SAHA should choose to employ its own staff, the staffing levels should be appropriate, and may include one or more FSS coordinators.
- (3) If SAHA chooses to contract with an outside organization, the organization's staffing levels must likewise be appropriate to establish and administer the FSS program, and the organization's responsibilities would include managing the FSS account in accordance with federal regulations.

- (4) SAHA will employ appropriate staff, including one or more FSS coordinators or program coordinators to administer its FSS program.

### 3.1.C ADMINISTRATIVE FEES AND COSTS

- (1) In the past, the ways in which administrative fees and costs were funded were different for public housing and Housing Choice Voucher (HCV) FSS programs, and the use of such funding was restricted to the applicable program.
- (2) In the Consolidated Appropriations Act of 2014, however, funding streams for the PH FSS and HCV FSS programs were combined, and all FSS funding is now awarded through one NOFA.
- (3) Use of this funding is no longer restricted to the applicable program—funding now may be used to serve both PH and HCV FSS participants.
- (4) Funding will be awarded through a Grant Agreement and disbursed through HUD's Line of Credit Control System (LOCCS,) similar to previous PH FSS awards; instead of an amendment to SAHA's Annual Contributions Contract (ACC), which was previously used for HCV awards.
- (5) PH FSS and HCV FSS funds awarded in prior years are still restricted to the applicable program, Rental Assistance Demonstration (RAD) programs accepted. Funding differences regarding previous years' funding is specified below.

(6) **Public Housing FSS Program**

For public housing FSS programs, the performance funding system (PFS), provided under section 9(a) of the 1937 Act provides for the reasonable and eligible administrative costs that SAHA incurs in carrying out the program only when funds have been appropriated. However, SAHA may use other resources for this purpose [24 CFR 984.302(a)].

- (a) In other words, SAHA may fund reasonable and eligible administrative costs in the FSS program from the Operating Fund.
- (b) However, these expenses will only be reimbursed in the operating subsidy when a current appropriations act allows it.
- (c) In addition, SAHA may fund reasonable and eligible administrative costs from the Capital Fund.
- (d) Administrative staffing costs may also be funded through HUD or other grant or foundation sources.
- (e) This includes FSS Coordinator grants when available.

(7) **Housing Choice Voucher FSS Program**

In the HCV program, administrative fees are paid to PHAs for HUD-approved costs associated with the operation of an FSS program.



- (a) These administrative fees are established by Congress and subject to appropriations [24 CFR 984.302(b)].
- (b) In addition, administrative fees for HUD-approved costs not specifically related to the operation of the FSS program may be used to cover these costs associated with the administration of FSS [see Notice PIH 93-24 E-7 and E-8].

### **3.1.D SUPPORTIVE SERVICES FEES AND COSTS**

- (1) As with administrative fees and costs, funding for supportive services fees and costs are now combined under one funding stream.
  - (a) Supportive services fees and costs include childcare expenses, transportation funds, and the costs of training, work equipment, or GED classes, among others.
  - (b) As with administrative fees and costs, funding will be awarded through a Grant Agreement and disbursed through HUD's Line of Credit Control System (LOCCS), similar to previous PH FSS awards; instead of an amendment to the PHA's Annual Contributions Contract (ACC), which was previously used for HCV awards.
  - (c) Remember, however, that funds awarded in prior years are still restricted to the applicable program.
- (2) Information for funds under previous years' awards are included in the sections below.
- (3) **Public Housing Supportive Services**  
 In public housing, SAHA may fund reasonable and eligible FSS supportive service costs in the FSS program from either the Operating Fund or the Capital Fund.
  - (a) However, in the Operating Fund, the costs of FSS supportive services are only reimbursed through the operating subsidy when appropriations allow it.
  - (b) In addition to the Operating Fund and Capital Fund, public housing supportive services can also be funded through HUD grants, other than FSS coordinator grants, when available.
- (4) **Housing Choice Voucher Supportive Services**  
 In the HCV program, SAHA may fund reasonable and eligible FSS supportive service costs in the FSS program from unrestricted net assets [see Notice PIH 93-24, E-3].

- (a) In addition, the PHA may seek additional funds from HUD through submitting grant applications, or seek grants from other sources when available.

### **3.1.E ON-SITE FACILITIES**

- (1) Each PHA may, subject to the approval of HUD, make available and utilize common areas or unoccupied dwelling units in public housing projects to provide supportive services under an FSS program.
- (2) This includes using such areas for participants in an HCV FSS program.

- (3) SAHA will make space available to provide supportive services under both the public housing and HCV FSS program.
- (4) In accordance with HUD regulations, SAHA will make offices and/or common areas within each public housing community available to provide supportive services for public housing FSS participants.
- (5) In accordance with HUD regulations and SAHA policy, SAHA will make offices at 818 S. Flores St., San Antonio, TX available to provide supportive services for HCV FSS participants.

## **3.2 PROGRAM COORDINATING COMMITTEE (PCC)**

### **3.2.A OVERVIEW**

- (1) As another integral part of FSS program administration, each participating PHA must establish a program coordinating committee (PCC) whose functions will be to assist SAHA in securing commitments of public and private resources for the operation of the FSS program within SAHA's jurisdiction, including assistance in developing the action plan and in implementing the program [24 CFR 984.202(a)].
- (2) The PCC must consist of certain members, which are dependent upon whether SAHA is operating a public housing or HCV program.
- (3) In addition to these required members, the PCC may also include additional members recommended by regulation.

### **3.2.B PCC MEMBERSHIP**

- (1) **Required PCC Membership [24 CFR 984.202(b)(1)]**
  - (a) For a public housing FSS program, the PCC members required consist of representatives of SAHA and public housing residents. The public housing resident representatives on the PCC will be solicited from one or more of the following groups:
    - (i) An area-wide or city-wide resident council.
    - (ii) If SAHA will be transferring FSS participants to vacant units in a specific public housing development, the resident council or resident management corporation of the public housing development where the public housing FSS program is to be carried out.
    - (iii) Any other public housing resident group that SAHA believes is interested in the FSS program and would contribute to the development and implementation of the FSS program.
  - (b) For an HCV FSS program, the PCC membership must consist of representatives of SAHA and participants of the HCV program or HUD's Office of Public and Indian Housing (PIH) programs.

#### **(2) SAHA's Required PCC Membership**

- (c) SAHA's representative to the PCC will be the PH FSS and HCV FSS Supervisors.
  - (i) FSS case management specialists will serve as administrative support to this committee.

- (d) PH resident representatives may be solicited from the Resident Ambassador program, Resident Councils, FSS alumni and/or a pool of PH residents who have expressed interest.
- (e) HCV resident representatives may be solicited from FSS alumni, a pool of HCV residents who have expressed interest, and/or a recruitment effort of HCV residents by FSS staff.

**(3) Recommended PCC Membership [24 CFR 984.202(b)(2)]**

Membership on the PCC also may include representatives of the unit of general local government served by SAHA, local agencies (if any) responsible for carrying out employment training programs or programs funded under the Workforce Innovation and Opportunities Act (WIOA) and other organizations, such as other state, local, or tribal welfare and employment agencies, public and private education or training institutions, child care providers, nonprofit service providers, private business, and any other public and private service providers with resources to assist the FSS program.

**(2) SAHA's Recommended PCC Membership**

- (c) SAHA's FSS program PCC membership will include, but is not limited to, leadership from the following organizations:
  - (i) Alamo Colleges District's Integrated Basic Education Skills Training (I-BEST) Program
  - (ii) Project QUEST
  - (iii) Workforce Solutions Alamo (WSA)
  - (iv) Providence Place
  - (v) San Antonio College's Financial Empowerment Center
  - (vi) San Antonio Fatherhood Campaign
  - (vii) South Texas Leadership Center
  - (viii) Neighborhood Assistance Corporation of America (NACA)
  - (ix) River City Credit Union
  - (x) Head Start
  - (xi) Catholic Charities San Antonio - Volunteer Income Tax Assistance (VITA) Program
  - (xii) Health Professions Opportunity Grants (HPOG)

- (xiii) Bexar County BiblioTech Library
- (xiv) Goodwill Industries San Antonio
- (xv) University Health System - CareLink
- (xvi) Wellcare
- (xvii) Martinez Street Women's Center
- (xviii) Healthy Texas Women
- (xix) Avance San Antonio

### **3.2.C ALTERNATIVE PCC COMMITTEE [24 CFR 984.202(c)]**

- (1) It is also possible for SAHA, in consultation with the chief executive officer of the unit of general local government served by SAHA, to use an existing entity as the PCC, as long as the membership of the existing entity consists or will consist of the individuals required by regulation (See section 3.2.B above).

- (2) SAHA will not utilize an existing entity as its program coordinating committee.



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 4**

## **SELECTING AND SERVING FSS FAMILIES**

## **CHAPTER 4: SELECTING AND SERVING FSS FAMILIES**

FSS regulations require that SAHA include in its Action Plan a statement indicating how it will select families for participation in the FSS program. This includes outreach, waiting list management and other selection procedures. Compliance with this chapter and applicable HUD regulations will ensure that families are selected for FSS participation without regard to race, color, religion, sex or gender expression, disability, familial status or national origin.

Once selected for participation in the FSS program, families are to be provided various activities and supportive services so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency. A description of such activities and supportive services is also a requirement of the FSS Action Plan.

This chapter contains three parts:

### **PART 1: Incentives, Outreach and Assurance of Non-Interference**

This part describes the incentives SAHA will offer and the outreach efforts SAHA will use in order to encourage participation and recruit eligible families for the FSS program. It also contains the required assurance of non-interference with the rights of non-participating families.

### **PART 2: Family Selection**

This part covers whether SAHA will use preferences for family selection and which preferences SAHA will employ if they choose to do so. In addition, this part describes the selection factors SAHA will use in screening families for participation in the FSS program.

### **PART 3: Activities and Support Services**

This part lists the activities and supportive services to be provided to families through both public and private resources, describes the method SAHA will use to identify family support needs and covers the required certification of coordination.

## 4.1 INCENTIVES, OUTREACH AND ASSURANCE OF NON-INTERFERENCE

### 4.1.A. OVERVIEW

- (1) The FSS program offers incentives such as the FSS escrow account, case management, and other supportive services that not only encourage participation, but also help families achieve self-sufficiency.
- (2) In addition to encouraging program participation through such incentives, PHAs also conduct outreach to recruit FSS participants from among eligible families.
- (3) As part of this process, families need to know that their choice as to whether to participate in the FSS program will not affect their admission to the public housing or housing choice voucher programs, nor will it affect their right to occupancy.
- (4) This part describes SAHA's policies regarding these issues, all of which are required aspects of the FSS Action Plan.

### 4.1.B INCENTIVES FOR PARTICIPATION [24 984.201(d)(5)]

- (1) By regulation, the FSS Action Plan must include SAHA's incentives plan—a description of the incentives that SAHA intends to offer eligible families to encourage their participation in the FSS program.
- (2) The incentives plan provides for the establishment of the FSS escrow account and any other incentives designed by SAHA.

- (3) In accordance with HUD regulations, SAHA will offer the incentive services identified in the SAHA Incentives for Participation Grid below.

#### SAHA Incentive Services for Participation Grid

Incentive Service Category	Service Provider*	Service Description
FSS Escrow Account	SAHA	An interest bearing escrow account where the difference from baseline rent and rent increase due to income increases is deposited and accrues on a monthly basis.
Case Management	FSS Case Management Specialists	An enhanced support system and holistic case management which includes ongoing individual



		assessment, service plan development, follow-up/monitoring of ITSP progress and career exploration or coaching.
Referral and Service Information	FSS Case Management Specialists	Enhanced access to educational, training, and employment opportunities. Access to free or reduced cost services and access to multiple financial literacy, credit building, home buying, car buying, and other important life skill workshops.
Partner Supportive Services Information	FSS Case Management Specialists; Agency Partners	Collaborative services and/or referrals to approved partner agencies for services similar to those listed above.
Other**	FSS Case Management Specialists; Agency Partners; SAHA	Collaborative services and/or referrals not otherwise included within the services above, which may be due to seasonal or emergency events as needed.
<p><b>**Service Provider</b> is defined as the primary party responsible for delivering the selected incentive service through the SAHA's Community Development Initiatives (CDI) department. In accordance with HUD regulations and subject to SAHA policy, CDI staff provide resident services coordination, which may also include collaboration with the following parties:</p> <ul style="list-style-type: none"> <li>• Internal SAHA stakeholders involved in SAHA program administration, as deemed necessary and appropriate by department leadership.</li> <li>• External community partners that represent nonprofits, community-based organizations and other government entities.</li> <li>• Other individuals, advocacy groups and community stakeholders, as deemed necessary and appropriate by SAHA leadership.</li> </ul> <p><b>**Other</b> is defined as additional supportive services and resources that, in accordance with HUD regulations and SAHA policy, may become available through internal staff or community support.</p>		

#### 4.1.C. OUTREACH EFFORTS [24 CFR 984.201(d)(6)(i)(ii)]

- (1) In addition to offering incentives for FSS participation, PHAs also conduct outreach in order to recruit more FSS participants from eligible families.
- (2) The FSS Action Plan must include a description of these efforts to recruit FSS participants, including notification and outreach, the actions SAHA will take to assure that both minority and non-minority groups are informed about the FSS program, and how SAHA will make this information known.
- (3) In accordance with HUD regulations, SAHA will notify and outreach to families on the FSS program according to the SAHA FSS Recruitment Grid below.
- (4) The points of contact and methods identified below have been selected to ensure that both minority and non-minority groups are informed about the FSS program.

#### SAHA FSS Recruitment Grid

Location / Activity	Staff / Partner	Method	Language*
Briefings, program information sessions, orientations	SAHA HCV Staff	Flyers Presentations	English Spanish
Program certifications (initial, interim and recertifications)	SAHA HCV Staff	Flyers Posters Presentations Referral forms	English Spanish Other as Needed
Community-wide and SAHA job fairs and resource fairs	FSS Case Management Specialist	Flyers Posters Referral forms	English Spanish
SAHA office lobbies	SAHA Lobby Staff and Receptionist	Flyers Posters Referral forms Videos Digital signage	English Spanish
SAHA offices and properties	SAHA Property and Office Staff	Flyers Posters Video	English Spanish

		Digital signage	
SAHA website	SAHA Public Affairs Staff	Flyer Video	English Spanish
Door-to-door recruiting in Public Housing or voucher communities	FSS Case Management Specialist and/or Property Staff	Flyer Referral forms	English Spanish
Public Housing Tenant Meetings	FSS Case Management Specialist	Flyer Presentation Video Referral form	English Spanish
Briefings to PHA partners	FSS Case Management Specialist	Flyer Presentation Video Referral form	English Spanish
Mass communications (email, mail, etc.) to current SAHA residents	PHA/HCV FSS Case Management Specialist	Flyer Referral form Email Letter / Mail	English Spanish
Social media posts through SAHA account	SAHA Public Affairs Staff	Email Social Media Posts	English Spanish
<p>*"Language" in this section refers to standard expectations for conducting outreach efforts. Per HUD regulations, additional language services are available and will be utilized where appropriate or requested.</p>			

#### **4.1.D ASSURANCE OF NON-INTERFERENCE WITH THE RIGHTS OF NON-PARTICIPATING FAMILIES [24 CFR 984.201(d)(10)]**

- (1) A family's housing assistance or admission into assisted housing should never depend on whether they choose to participate in the FSS program, and PHAs need to make this known as part of the recruitment process.
- (2) For this reason, SAHA's Action Plan must include an assurance that a family's decision to not participate in the FSS program will not affect the family's admission to the public housing or housing choice voucher programs, nor will it affect the family's right to occupancy in accordance with the lease.

- (3) Participation in the FSS program is strictly voluntary.
- (4) Public housing residents and Housing Choice Voucher (HCV) program participants will be notified in all literature and media presentations related to the FSS program that should they decide not to participate in the FSS program it will not affect their public housing or HCV assistance.
- (5) This material will also specify that the family will retain the right to occupancy, according to the terms of their lease and family obligations contract.

## **4.2 FAMILY SELECTION**

### **4.2.A. OVERVIEW**

- (1) The FSS Action Plan is required to contain a statement indicating the procedures for selecting families for FSS program participation, including a description of how SAHA will do so without regard to race, color, religion, sex or gender expression, disability, familial status or national origin.
- (2) This part describes these procedures, taking into account whether SAHA will use preferences for family selection and which preferences SAHA will employ if they choose to do so, in addition to defining the factors SAHA will use in screening families for program participation.

### **4.2.B. FSS SELECTION PREFERENCES**

- (1) As part of the process for selecting families for participation in the FSS program, SAHA may choose whether to employ the use of preferences.
  - (a) In particular, if SAHA so chooses, it has the option of giving a selection preference for up to 50 percent of its public housing FSS slots and 50 percent of its HCV program FSS slots, respectively, to eligible families who have one or more family members currently enrolled in an FSS-related service program or who are on the waiting list for such a program.
  - (b) Such a preference may be further limited to participants in and applicants for one or more specific eligible FSS-related service programs.
- (2) Should SAHA choose to adopt such a preference, it would need to include the following information in its Action Plan:
  - (a) The percentage of FSS slots, not to exceed 50 percent of the total number of FSS slots for each of its FSS programs, for which it will give a selection preference.
  - (b) The FSS related service programs to which it will give a selection preference to the programs' participants and applicants
  - (c) The method of outreach to and selection of families with one or more members participating in the identified programs [24 CFR 984.203(a)]
- (3) SAHA may wish to adopt additional selection preferences as well [Notice PIH 93-24].
- (4) SAHA has not adopted a selection preference.

- (8) Even with up to 50 percent of the total number of FSS slots filled via selection preferences, and the possibility of other slots being filled by means of additional preferences, open slots will remain.
- (9) Regardless of whether SAHA adopts selection preferences, those FSS slots for which SAHA chooses **not** to exercise the selection preference must be filled with eligible families in accordance with an objective selection system such as a lottery, the length of time living in subsidized housing, or the date the family expressed an interest in participating in the FSS program.
- (10) This system must be described in the Action Plan [24 CFR 984.203(b)].
- (11) SAHA will use the date the family expressed an interest in participating by completing an FSS interest form to fill the FSS slots when SAHA chooses not to exercise the selection preference.

#### 4.2.C. SELECTION FACTORS

- (1) Many factors contribute to whether SAHA may choose to select a family for participation in the FSS program.
- (2) These selection factors can help SAHA screen families for admission, and ultimately contribute to SAHA's decision to either allow or deny a family's admission into the FSS program.
- (3) **Motivation Selection Factors [24 CFR 984.203(c)(1)]**
  - (a) SAHA may screen families for interest and motivation to participate in the FSS program provided that the factors utilized by SAHA are those which solely measure the family's interest and motivation to participate in the FSS program.
  - (b) For this reason, SAHA must only apply motivational screening factors that are permissible under the regulations.
- (4) **Permissible Motivation Selection Factors**
  - (a) Permitted motivational factors include requiring attendance at FSS orientation sessions or pre-selection interviews, and assigning certain tasks indicating the family's willingness to undertake the obligations that may be imposed by the FSS contract of participation.
  - (b) However, any tasks assigned should be readily accomplishable by the family based on the family members' educational level or disabilities, if any.

- (c) Reasonable accommodations must be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities [24 CFR 984.203(c)(2)].

- (5) SAHA will screen families for interest and motivation to participate in the FSS program by assigning an interview which, excepting reasonable accommodations, is the same type of interview for each family.
- (6) SAHA will only use the fact that the family attended as a screening factor, even if tasks or exercises are not completed in the meeting.
- (7) In addition, if the family needs either childcare or transportation to be able to attend, or requests an accommodation for a disability, SAHA will either refer the family to available services or exempt the family from this screening factor, in accordance with federal HUD regulations.

**(8) Prohibited Motivation Selection Factors**

Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors, such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or non-minority groups [24 CFR 984.203(C)(3)].

**(9) Other Selection Factors**

In addition to motivational screening, SAHA may also wish to screen families for other factors.

**(10) PHA Debt Selection Factor**

SAHA may deny FSS participation to a family if the family owes SAHA, or another PHA, money in connection with HCV or public housing assistance [Notice PIH 93-24, B-18].

- (a) In accordance with HUD regulations, SAHA will not deny FSS participation to a family if the family owes SAHA, or another PHA, money in connection with HCV or public housing assistance.

**(11) Unavailable Support Services Selection Factor**

If SAHA determines, after consulting with the family, that a missing service is essential to the family's needs, SAHA may skip that family (and other similar families) and offer the FSS slot to the next family for which there are available services [Notice PIH 93-24, B-8].

- (a) If a reasonable attempt at securing services has been made, and essential services are still unavailable or missing, SAHA may skip that family and offer the FSS slot to the next family for which services are available.

(12) **Previous Participation Selection Factor**

- (a) SAHA may refuse to select a family for participation in the FSS program a second time if that family previously participated unsuccessfully (i.e., the family participated, did not meet its FSS obligations, and was terminated from the FSS program) [Notice PIH 93-24, B-14].

- (b) SAHA, at its discretion, may approve selection of a family for participation in the FSS program a second time, if they have completed a one-year waiting period.
  - (i) In accordance with SAHA policy, SAHA may waive the requirement for a one-year waiting period due to good cause reasons or other mitigating factors which may have contributed to the family's previously unsuccessful participation and termination from the FSS program.



## **4.3 ACTIVITIES AND SUPPORT SERVICES**

### **4.3.A OVERVIEW**

- (1) Once families are admitted to the FSS program, SAHA becomes responsible for making sure these families are adequately served.
- (2) The purpose of the Family Self-Sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of public housing assistance and assistance under the housing choice voucher programs with public and private resources, to enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency.
- (3) As such, upon selection, families are matched with the appropriate activities and supportive services so that they may obtain the education, employment, and business and social skills necessary to overcome systemic and personal barriers to achieve self-sufficiency. This service coordination is a vital element of the FSS program.

### **4.3.B METHOD OF IDENTIFYING FAMILY SUPPORT NEEDS [24 CFR 984.201(d)(8)]**

- (1) Before SAHA can determine the services and activities it will provide to FSS families, it must identify the services and activities appropriate to each family.
- (2) The Action Plan must contain a description of how the program will identify the needs of FSS families and deliver the services and activities according to these needs.

- (3) Supportive services needs are identified by completion of a needs assessment with the FSS coordinator or case manager before completion of the initial Individual Training and Services Plan (ITSP), which occurs prior to signing the contract of participation.
- (4) After enrollment in the FSS program, needs assessment results may also be used to modify the ITSP and supportive services, if requested by the family and in accordance with HUD regulations and SAHA policy.

#### 4.3.C FSS ACTIVITIES AND SUPPORT SERVICES DESCRIPTION [24 CFR 984.201(d)(7)]

- (1) As part of the required contents of the Action Plan, PHAs must both describe the activities and supportive services to be provided by public and private resources to FSS families, and identify the public and private resources that are expected to provide the supportive services.
- (2) Of course, this task assumes that SAHA has first identified the needed activities and supportive services.
- (3) SAHA's FSS program, through its partners on the Program Coordinating Committee (PCC) and other relevant partnerships, offer FSS families with culturally competent activities and supportive services.
  - (a) A sample of these supportive services are listed in the SAHA FSS Supportive Services Table below.

**SAHA FSS Supportive Services Table**

General Supportive Services	Categorical Supportive Services	Service Providers and Community Partners
<b>Professional Assessment Services</b>	<ul style="list-style-type: none"> <li>• Vocational Assessment</li> <li>• Educational Assessment</li> <li>• Vocational Planning</li> <li>• Educational Planning</li> <li>• Disability Assessment</li> <li>• Disability Vocational Assessment/Planning</li> <li>• Disability Educational Assessment/Planning</li> <li>• Drug/Alcohol Assessment</li> <li>• Drug/Alcohol Planning</li> <li>• Intimate Partner Violence (IPV) Assessments and Safety Planning</li> </ul>	<ul style="list-style-type: none"> <li>• SAHA</li> <li>• Alamo Colleges' IBEST Program</li> <li>• Avance</li> <li>• Family Violence and Prevention Services, Inc. (FVPS)</li> <li>• Family Service Association</li> <li>• Gary Job Corps</li> <li>• IDEA Public Schools</li> <li>• Project QUEST</li> <li>• Providence Place</li> <li>• Restore Education</li> <li>• San Antonio College (SAC) Empowerment Center</li> <li>• San Antonio Fatherhood Campaign</li> <li>• South Texas Leadership Program</li> </ul>

		<ul style="list-style-type: none"> <li>• Workforce Solutions Alamo (WSA)</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>• High School Completion or General Education Development (GED)</li> <li>• English as a Second Language (ESL) courses and/or GED</li> <li>• Post-Secondary Education or Certification</li> <li>• College (traditional and/or community college programs)</li> </ul>	<ul style="list-style-type: none"> <li>• Alamo Colleges District</li> <li>• Avance</li> <li>• Bibliotech</li> <li>• Bibliotech East</li> <li>• Gary Job Corps</li> <li>• IDEA Public Schools</li> <li>• KIPP</li> <li>• Restore Education</li> <li>• South Texas Leadership Program</li> </ul>
<b>Training</b>	<ul style="list-style-type: none"> <li>• Skills Training</li> <li>• Emerging Technologies Training</li> <li>• Industry-Specific Training and Certifications</li> <li>• On-the-Job Training</li> <li>• Functional Context Training</li> </ul>	<ul style="list-style-type: none"> <li>• Workforce Solutions Alamo (WSA)</li> <li>• Project QUEST</li> <li>• Gary Job Corps</li> <li>• Express Employment Professionals</li> <li>• Alamo College's IBEST</li> <li>• Avance</li> <li>• Health Professions Opportunity Grants (HPOG) Program</li> <li>• LOD Resource Group</li> </ul>
<b>Vocational and Employment Assistance</b>	<ul style="list-style-type: none"> <li>• Resume Preparation</li> <li>• Interviewing Skills</li> <li>• Professional Clothing Assistance</li> <li>• Workplace Skills</li> <li>• Job Development</li> <li>• Job Placement</li> </ul>	<ul style="list-style-type: none"> <li>• Army National Guard</li> <li>• Costa Solutions</li> <li>• Express Employment Professionals</li> <li>• Gary Job Corps</li> <li>• Project QUEST</li> <li>• Staff Zone</li> <li>• Tri-Starr Personnel</li> <li>• Workforce Solutions</li> <li>• Martinez Street Women's Center</li> <li>• LOD Resource Group</li> <li>• Restore Education</li> <li>• Dress for Success</li> </ul>
<b>Transportation</b>	<ul style="list-style-type: none"> <li>• Public Transportation and Bus Service</li> </ul>	<ul style="list-style-type: none"> <li>• VIA Metropolitan Transit and VIATrans</li> </ul>

	<ul style="list-style-type: none"> <li>• Accessible / Paratransit Services</li> </ul>	<ul style="list-style-type: none"> <li>• Alamo Area Council of Governments (AACOG)</li> </ul>
<b>Health Care</b>	<ul style="list-style-type: none"> <li>• Alcohol and Drug Prevention</li> <li>• Alcohol and Drug Treatment</li> </ul>	<ul style="list-style-type: none"> <li>• University Health System</li> <li>• United Healthcare</li> <li>• Martinez Street Women's Center</li> <li>• HealthyTexas Women</li> </ul>
<b>Mentorship and Peer Support</b>	<ul style="list-style-type: none"> <li>• Mentoring Match</li> </ul>	<ul style="list-style-type: none"> <li>• Workforce Solutions</li> <li>• South Texas Leadership Program</li> <li>• San Antonio Fatherhood Campaign</li> <li>• The Neighborhood Place</li> <li>• Project QUEST</li> <li>• Martinez Street Women's Center</li> </ul>
<b>Micro/Small Business Development and Entrepreneurship</b>	<ul style="list-style-type: none"> <li>• Training</li> <li>• Planning</li> <li>• Technical Assistance</li> <li>• Mentoring</li> </ul>	<ul style="list-style-type: none"> <li>• Alamo Colleges' IBEST Program</li> <li>• Bibliotech</li> <li>• Bibliotech East</li> <li>• Goodwill</li> <li>• SAC - Empowerment Center</li> <li>• South Texas Leadership Center</li> <li>• Martinez Street Women's Center</li> </ul>
<b>Homeownership</b>	<ul style="list-style-type: none"> <li>• Training</li> <li>• Planning</li> <li>• Debt Resolution</li> </ul>	<ul style="list-style-type: none"> <li>• San Antonio Housing Authority</li> <li>• SAC - Empowerment Center</li> <li>• River City Credit Union</li> <li>• Habitat for Humanity</li> <li>• City of San Antonio Neighborhood &amp; Housing Services Department</li> <li>• City of San Antonio Fair Housing Program</li> <li>• NACA</li> <li>• Cross Timber Homes</li> </ul>

<b>Individual Development Accounts (IDA)</b>	<ul style="list-style-type: none"> <li>• Match Savings Accounts</li> <li>• Distribution of IDA Funds</li> </ul>	<ul style="list-style-type: none"> <li>• SAHA</li> </ul>
<b>Child Care</b>	<ul style="list-style-type: none"> <li>• Infant Care</li> <li>• Toddler Care</li> <li>• Preschool Care</li> <li>• Afterschool Care</li> <li>• Homework Assistance</li> </ul>	<ul style="list-style-type: none"> <li>• Family Violence and Prevention Services, Inc. (FVPS)</li> <li>• Bibliotech</li> <li>• Compass Rose</li> <li>• Family Service Association</li> <li>• IDEA Public Schools</li> <li>• KIPP</li> <li>• Providence Place</li> <li>• HPOG</li> <li>• Head Start</li> <li>• San Antonio Fatherhood Campaign</li> <li>• Texas Diaper Bank</li> <li>• Workforce Solutions Alamo (WSA)</li> </ul>
<b>Crisis Services</b>	<ul style="list-style-type: none"> <li>• Crisis Assessment</li> <li>• Crisis Intervention</li> <li>• Crisis Management</li> <li>• Crisis Resolution</li> </ul>	<ul style="list-style-type: none"> <li>• Family Violence and Prevention Services, Inc. (FVPS)</li> <li>• Providence Place</li> </ul>
<b>Child / Adult Protective Services</b>	<ul style="list-style-type: none"> <li>• Needs Assessment</li> <li>• Case Planning</li> <li>• Information Referral</li> <li>• Crisis Management</li> </ul>	<ul style="list-style-type: none"> <li>• Child Protective Services (CPS)</li> <li>• Adult Protective Services (APS)</li> <li>• IDEA Public Schools</li> <li>• Providence Place</li> <li>• Family Service Association</li> </ul>
<b>Legal Services</b>	<ul style="list-style-type: none"> <li>• Representation</li> <li>• Document Review</li> <li>• Counsel or Advice</li> </ul>	<ul style="list-style-type: none"> <li>• Bexar County Dispute Resolution Center</li> <li>• St. Mary's Law School</li> <li>• Texas Rio Grande Legal Aid (TRLA)</li> <li>• San Antonio Bar Association</li> </ul>
<b>Debt Resolution and Credit Repair</b>	<ul style="list-style-type: none"> <li>• Needs Assessment</li> <li>• Case Planning</li> <li>• Advocacy</li> <li>• Negotiation</li> </ul>	<ul style="list-style-type: none"> <li>• Catholic Charities</li> <li>• Volunteer Income Tax Assistance (VITA) Program</li> </ul>

	<ul style="list-style-type: none"> <li>• Consumer Protection and Advocacy</li> <li>• Financial Literacy</li> </ul>	<ul style="list-style-type: none"> <li>• BBVA Compass</li> <li>• Financial Empowerment Center</li> </ul>
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#### 4.3.D CERTIFICATION OF COORDINATION [24 CFR 984.201(d)(12)]

- (1) The FSS Action Plan is required to contain a certification that the development of the activities and services under the FSS program has been coordinated with the JOBS program (now “Welfare to Work” under TANF), the programs provided under the JTPA [now “Workforce Innovation and Opportunity Act” (WIOA) programs], and any other relevant employment, child care, transportation, training and education programs in the applicable area.
- (2) The implementation of the FSS program’s activities and services must continue to be coordinated as such in order to avoid duplication of activities and services.

- (3) SAHA certifies that its FSS program has developed its services and activities in coordination with the Workforce Innovation and Opportunity Act (WIOA) programs (formerly “JTPA”), Workforce Investment Board and One Stop Centers, Welfare to Work (formerly the “JOBS” program), and any other relevant professional employment, child care, transportation, training and education programs in the applicable area.
  - (a)
- (4) The implementation of these activities and services will continue to be coordinated in this manner in order to avoid duplication of activities and services, and to ensure the highest quality of service coordination for SAHA clients.



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 5**

## **CONTRACT OF PARTICIPATION**

## CHAPTER 5: CONTRACT OF PARTICIPATION

Each family that is selected to participate in an FSS program must enter into a contract of participation with SAHA. This contract, which is signed by the head of the FSS family, sets forth the principal terms and conditions governing participation in the FSS program, including the rights and responsibilities of the FSS family and of SAHA, the services to be provided to the head of the FSS family and each adult member of the family who elects to participate in the program, and the activities to be completed by them. The contract also incorporates the Individual Training and Services Plan (ITSP) [24 CFR 984.303].

This chapter contains two parts:

### **PART 1: Overview and Family Obligations**

This part provides an overview of the form and content of the contract of participation and describes what the contract requires of FSS families.

### **PART 2: Contract Specifications**

This part explains the specifications of the contract, including terms and conditions, contract modification, contract terminations, and grievance procedures.



## 5.1 OVERVIEW AND FAMILY OBLIGATIONS

### 5.1.A OVERVIEW

- (1) The purpose of the FSS contract of participation is to set forth the principal terms and conditions governing participation in the FSS program, including the incorporation of the Individual Training and Services Plan (ITSP) as part of the contract's required contents.
- (2) The ITSP is meant to establish goals for an FSS family to meet along the family's way to completing the contract and becoming self-sufficient.
- (3) In addition to the goals specified in the ITSP, the contract also lists the responsibilities of the family and SAHA.
- (4) This part covers the ITSP as part of the required contents of the contract of participation, and the family's obligations under the contract.

### 5.1.B CONTENTS OF THE CONTRACT OF PARTICIPATION

#### (1) Individual Training and Services Plan

As part of the required contents of the FSS contract of participation (COP), the ITSP establishes specific interim and final goals by which SAHA and the family measure the family's progress toward fulfilling its obligations under the contract of participation and becoming self-sufficient.

- (a) Interim and final goals will differ depending on the family's individual needs.
- (b) Further, regulations require the establishment of an interim goal regarding independence from welfare assistance.

#### (2) Interim Goals

For each participating FSS family that receives welfare assistance, SAHA must establish as an interim goal that the family become independent from welfare assistance and remain independent from welfare assistance for at least one year before the expiration of the term of the contract of participation, including any extension thereof [24 CFR 984.303(b)(2)].

- (a) At its discretion, SAHA may also elect to suggest this as an interim goal in the ITSP regardless of whether a family is receiving welfare assistance at the time the COP is developed.

- (b) If the family is not receiving cash welfare assistance (TANF) at the time the contract of participation is being developed, SAHA will not suggest to each family participating in the FSS program that the family include an interim goal on its ITSP for the family to become independent from cash welfare assistance and remain cash

welfare-free for at least one year before the expiration of the term of the contract of participation.

(3) **ITSPs for FSS Family Members Other than FSS Head**

An ITSP is only required for the head of the FSS family.

- (a) This means that it is SAHA's decision, after consulting with the family, whether to create an ITSP and provide supportive services to other family members aged 18 or over if they want to participate in the FSS program and supportive services are available [Notice PIH 93-24, G-16].

- (b) SAHA will permit additional family members to have an ITSP, in accordance with HUD guidance and relevant SAHA policy.

**5.1.C FAMILY OBLIGATIONS**

(1) **Compliance with Lease Terms**

One of the obligations of the FSS family according to the contract of participation is to comply with the terms and conditions of the public housing lease or HCV program assisted lease [24 CFR 984.303(b)(3)].

- (a) Inability to comply with the lease represents an inability to comply with the contract, therefore regulations regarding noncompliance with the FSS contract apply [see 24 CFR 984.303(b)(5)].
- (b) It is up to SAHA to determine the plan of action for FSS families found in noncompliance with the lease and how SAHA will precisely define the term **comply with the lease**.

- (b) For the purposes of the FSS program, **comply with the lease** means the FSS family has not been evicted for repeated or serious violations of the lease; or if they have been evicted for serious or repeated violations of the lease, the family has prevailed in either the grievance hearing or the informal hearing process.

(2) **Employment Obligation [24 CFR 984.303 (b)(4)]**

Another obligation set forth by the contract of participation is for the head of the FSS family to **seek and maintain suitable employment** during the term of the contract and any extension.

- (a) Although other members of the FSS family may seek and maintain employment during the term of the contract, it is only a requirement for the head of the FSS family.
- (b) The obligation for the head of the FSS family to **seek employment** is defined in the regulatory language as meaning that the head of the FSS family has applied for employment, attended job interviews, and has otherwise followed through on employment opportunities.
  - (i) However, this definition still leaves room for policy decisions on the part of SAHA because it does not define the level of activity involved in “seeking.”
- (c) There is no regulatory definition of **maintain employment**.
  - (i) For this reason, it is up to SAHA to define the term.
- (d) In addition, there is no minimum period of time that an FSS head of household needs to be employed in order to meet its contract of participation requirements [Notice PIH 93-24, G-9].
- (e) According to regulation, SAHA makes a determination of suitable employment based on the skills, education and job training of the FSS head of household, and based on the available job opportunities within the jurisdiction served by SAHA [24 CFR 984.303(b)(4)(iii)].
  - (i) This means that SAHA has the ultimate responsibility for making the decision regarding the suitability of employment.
  - (ii) However, this decision must be made in conjunction with the head of the FSS family [Notice PIH 93-24, G-3].

- (f) For purposes of SAHA’s FSS program, **seek employment** means the head of household has applied for employment, attended job interviews and otherwise followed through on employment opportunities as outlined in the ITSP of their contract of participation (COP).
- (g) **Suitable employment** means employment as outlined in the ITSP of the COP and is based on the assessment of the available job opportunities in the area in which the FSS family resides as well as life circumstances, personal goals, skills, education and job training of the head of household.
- (c) **Maintain employment** means that the FSS head of household will complete all of the obligations outlined in the ITSP of their COP, and be employed full-time or employed part-time and enrolled in

part-time training/education concurrently.

- (i) If the head of the family's skills, education and job training do not provide access to full-time work opportunities in the area in which the FSS family resides on the last effective day of the COP or be employed and enrolled, and participating as agreed, in a part-time education or training program on the last effective day of the COP.
- (ii) SAHA will require third-party verification of this employment and/or enrollment.

### 5.1.D CONSEQUENCES OF NON-COMPLIANCE WITH THE CONTRACT

- (1) Consequences apply for families who do not meet the terms and conditions of the contract.
  - (a) The regulations require that the contract of participation specify that if the FSS family fails to comply, without good cause, with the terms and conditions of the contract (including compliance with the public housing lease or the HCV-assisted lease), SAHA may:
    - Withhold supportive services
    - Terminate the family's participation in the FSS program
- (2) Per the alternative requirements listed in the *Federal Register* notice dated December 29, 2014, PHAs are no longer permitted to terminate HCV assistance to a family due to the family's failure to meet its obligations under the FSS contract of participation (COP) [FR Notice 12/29/14].

- (a) Unless there is a good cause reason, the COP will be terminated before the expiration of the contract term if the participant fails to meet their obligations as outlined in the contract.
  - (i) For the purpose of this section, "good cause" will be defined as outlined in the Administrative Plan, the Admissions and Continued Occupancy Policy (ACOP) and as determined by SAHA leadership.
- (b) If the FSS family fails to meet COP obligations, the family will receive one written warning prior to any additional action.
- (c) Additional instances of non-compliance will result in the reassessment of needs within the ITSP and, as appropriate, changes to the ITSP to ensure compliance with COP obligations.
  - (i) The family will receive one written warning on non-compliance with their obligations under the COP.
  - (ii) If reassessment and ITSP changes do not result in program compliance as outlined in the COP, then the FSS Case Management Specialist will withhold supportive services.
    - (A) Withholding supportive services for continued non-compliance must be approved by the department leadership prior to any change in services.
    - (B) If approved under this section, supportive services may be withheld for no more than 90 days or until the for no more than 90 days until the participant meets their obligations outlined in the COP. Finally, if neither of

these alternatives is successful, the FSS coordinator will terminate the COP for failure to complete the tasks, interim goals, or final goals of the ITSP in a timely manner, and thus failure to complete the obligations outlined in the COP.

- (c) SAHA's FSS program will not terminate the FSS contract of participation for failure to comply with the terms of the lease.

#### PHA Policy

[see above]

The FSS coordinator will make an exception to the actions in terminating the COP if the participant can demonstrate "good cause" for the failure to meet its obligations as outlined in the COP.

For purposes of the PHA FSS program, *good cause* includes:

#### Family circumstances

Death in the family

Serious illness

Medical emergency

Mandatory court appearances

Involuntary loss of employment

Loss of head of household through death, incarceration, or removal from lease

Change in the ITSP improving progress toward economic self-sufficiency

#### Community circumstances

Significant reduction in workforce (over 20 percent reduction in employment field)

Significant interruption in service delivery (over 3 months interruption)

Provider noncompliance with regulation

Provider unable/unwilling to provide service

Provider offering inferior service

## 5.2 CONTRACT SPECIFICATIONS

### 5.2.A OVERVIEW

- (1) In addition to making clear the family's obligations under the program, the contract of participation contains specific terms and conditions, including those governing contract modifications, terminations, and grievance procedures.
- (2) This part describes those specifications and associated policy.

### 5.2.B CONTRACT TERM [24 CFR 984.303(c)]

- (1) The contract term is five years.
  - (a) This means that the family has no more than five years from the effective date of the COP to fulfill their obligations as specified in the contract.
  - (b) This five-year term requirement will be specified in the COP.
- (2) **Contract Extension [24 CFR 984.303(d)]**

While the term set forth in the contract of participation is for five years, contract extensions are possible.

- (a) According to regulation, PHAs will for "good cause" extend the term of the contract for a period not to exceed two years for any FSS family that requests an extension of the contract in writing.
- (b) The family's written request for an extension must include a description of the need for the extension.
- (c) **Good cause** means circumstances beyond the control of the FSS family, as determined by SAHA, such as a serious illness or involuntary loss of employment (further defined by SAHA policy in Section 5.1.D).
  - (i) Extension of the contract of participation will entitle the FSS family to continue to have amounts credited to the family's FSS account.

### 5.2.C MODIFICATION OF THE CONTRACT

- (1) The COP does have the ability to be modified, as long as SAHA and the FSS family mutually agree to modify it.
  - (a) This includes modifications in writing with respect to ITSPs, the contract term (See Section 5.2.B above) and designation of the head of the family [24 CFR 984.303(f)].
- (2) In addition, SAHA may also delete the line in the COP under "Corrective Actions to Meet Family Responsibilities" stating that if the family is

participating in the HCV program, SAHA may terminate HCV assistance when allowed by HUD requirements.

- (a) Mutual agreement is not needed for this modification [Notice PIH 95-5].
- (b) Termination of HCV assistance is covered in further detail in Section 5.2.G.
- (c) The conditions under which SAHA will modify the contract are set forth in the policy below.

- (d) In SAHA's FSS program, the COP will be modified by mutual agreement between SAHA and the head of household when:
  - (i) Modifications to the ITSP would better reflect the family's current aspirations toward self-sufficiency, as indicated by a needs assessment and/or requested by the family.
  - (ii) Modifications to the ITSP would reasonably improve or enable the family to make progress towards self-sufficiency and to meet or exceed contract obligations.
  - (iii) The FSS family head listed on the COP no longer resides in the assisted unit, and the remaining family members designate a new FSS head of household.
  - (iv) When a relocating FSS family is entering the FSS program of a receiving PHA, and the start date of the COP must be changed to reflect the date the new COP is signed.
  - (v) When modifications to the ITSP are recommended by SAHA's Internal Audit or for the purpose of correcting errors on a previously completed ITSP.
- (c) SAHA will remove the line under "Corrective Actions to Meet Family Responsibilities," which states that, when allowed by HUD requirements, PHAs may terminate the family's assistance in the HCV program.

## 5.2.D COMPLETION OF THE CONTRACT

- (1) By regulation, the COP is considered complete, and a family's participation in the FSS program is considered concluded, when one of the following occurs [24 CFR 984.303(g)]:



- The FSS family has fulfilled all of its obligations under the contract of participation on or before the expiration of the contract term, including any extension thereof.
  - 30 percent of the monthly adjusted income of the FSS family equals or exceeds the published existing housing fair market rent for the size of the unit for which the FSS family qualifies based on SAHA's occupancy standards. The COP will be considered completed and the family's participation in the FSS program concluded on this basis even though the contract term, including any extension thereof, has not expired, and the family members who have individual training and services plans have not completed all the activities set forth in their plans.
- (2) Policies on verifying completion of the COP can be found in Section 6.1.C of this Action Plan.

#### **5.2.E TRANSITIONAL SUPPORTIVE SERVICE ASSISTANCE**

- (1) Even after a family has completed the COP, SAHA may continue to offer appropriate FSS supportive services to a former FSS family whose head of household is employed.
- (2) If the family still resides in public housing, or HCV-assisted housing, these supportive services would be offered for becoming self-sufficient.
- (3) If the family no longer resides in public housing, HCV-assisted housing, or other assisted housing, these supportive services would be offered for remaining self-sufficient [24 CFR 984.303(j)].

- (4) SAHA will continue to offer supportive services to a former FSS family that has completed its COP, and whose head of household is employed.

#### **5.2.F TERMINATION OF THE CONTRACT**

- (1) The COP may be terminated before the expiration of the contract term and any extension of the contract by the following [24 CFR 984.303(h)]:
- Mutual consent of the parties;
  - Failure of the FSS family to meet its obligations under the COP without good cause, including in an HCV FSS program the failure to comply with the contract requirements because the family has moved outside the jurisdiction of SAHA;
  - The family's withdrawal from the FSS program;

- Such other act as is deemed inconsistent with the purpose of the FSS program; or
- Operation of law.

- (2) The COP will be terminated before the expiration of the contract term, and any extension thereof, for any of the reasons listed in 5.2.F and in accordance with HUD regulations.
- (3) Unless there is a good cause reason for the family failing to meet its obligations under the COP, SAHA will follow the relevant policy specified in Section 5.1.D of this Action Plan.
  - (a) **Good cause**, for the purposes of the FSS program, is also defined in Section 5.1.D.
- (4) In addition, the COP is automatically terminated if the family's HCV or public housing assistance is terminated in accordance with HUD requirements [24 CFR 984.303(h)].

#### **5.2.G OPTION TO WITHHOLD OR TERMINATE SUPPORTIVE SERVICE AND HOUSING ASSISTANCE [24 CFR 984.303(b)(5)(i)]**

- (1) As touched upon in Section 5.1.D of this Action Plan, SAHA has the option to terminate or withhold supportive services and the FSS family's participation in the FSS program if SAHA determines that the FSS family failed to comply with the requirements of the COP without good cause.
- (2) Per the alternative requirements listed in the *Federal Register* notice dated December 29, 2014, however, PHAs are no longer permitted to terminate HCV assistance to a family due to the family's failure to meet its obligations under the contract of participation [FR Notice 12/29/14].

#### **5.2.H NULLIFICATION OF CONTRACT FOR UNAVAILABILITY OF SUPPORTIVE SERVICES [24 CFR 984.303(e)]**

- (1) In addition to termination, the COP can also be ended ahead of time as a result of integral supportive services being unavailable.
- (2) However, this should only occur as a last resort in the event that:
  - A social service agency fails to deliver the supportive services pledged under an FSS family member's individual training and services plan (ITSP), SAHA must make a good faith effort to obtain these services from another agency.

- If SAHA is unable to obtain the services from another agency, SAHA must reassess the family member's needs and determine whether other available services would achieve the same purpose.
  - If other available services would not achieve the same purpose, SAHA shall determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.
  - If the unavailable services are not integral to the FSS family's advancement toward self-sufficiency, SAHA must revise the ITSP, delete these services and modify the COP to remove any obligation on the part of the FSS family to accept the unavailable services.
  - If the unavailable services *are* determined to be integral to the FSS family's advancement toward self-sufficiency (which may be the case if the affected family member is the head of the FSS family), SAHA shall declare the COP null and void.
- (3) Nullification of the COP on the basis of unavailability of supportive services shall not be grounds for termination of HCV assistance.

## 5.2.I GRIEVANCE PROCEDURES

- (1) When adverse action is taken by SAHA against a family, SAHA is required to provide a grievance hearing in the public housing program, or an informal hearing in the housing choice voucher program [24 CFR 966 subpart B, 24 CFR 982.554].
- (2) According to regulatory requirements, the FSS Action Plan must contain the grievance and hearing procedures available for FSS families against whom SAHA has taken adverse action with regards to FSS [24 CFR 984.201(d)(9)].

- (2) SAHA's FSS program will utilize the grievance procedures and policies for the FSS family's respective housing assistance program.
- (a) HCV FSS families will be subject to the informal review and hearings procedures as outlined in Section 16.3 of the Administrative Plan.
  - (b) FSS families residing in public housing will utilize the grievance procedures outlined in the Admissions and Continued Occupancy Policy (ACOP) and SAHA's Public Housing Lease. See Chapter 16

of the ACOP for public housing grievance and informal hearing procedures.

- (3) In addition to the adverse actions listed in SAHA's HCV and public housing programs, the FSS program's adverse actions include, but are not limited to:
- (a) Denial of admission into the FSS program;
  - (b) Denial of request for supportive services;
  - (c) Denial of request to change the ITSP;
  - (d) Denial of request to change the head of household;
  - (e) Denial of request for interim disbursement of the escrow account;
  - (f) Denial of request to complete the COP;
  - (g) Denial of a request for extension to the FSS COP;
  - (h) Denial of request for final distribution of the escrow account or any portion thereof;
  - (i) Withholding of support services; and
  - (j) Termination of the FSS COP.



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 6**

## **ESCROW ACCOUNT**

## CHAPTER 6: ESCROW ACCOUNT

The establishment of an escrow account is offered as a financial incentive to families for participation in the FSS program. Generally, under this incentive, the amount of an increase in family rent resulting from an increase in earned income is escrowed. That is, usually a family's rent or share of the rent goes up when the family experiences an increase in earned income. In the FSS program, this is still the case, but the part of the rent representing the increase is deposited into an account as an escrow credit. The funds from this escrow account then become available to FSS families upon successful completion of their contracts of participation.

This chapter explains how the FSS escrow account works, including calculating the amount of the escrow credit and disbursing the funds, and also covers the proper way for SAHA to manage and report on the account.

This chapter contains two parts:

### **PART 1: The Escrow Account**

This part provides an overview of how the escrow account works, including calculating the escrow credit and disbursing the funds upon completion of the contract of participation.

### **PART 2: Escrow Fund Accounting and Reporting**

This part describes the requirements for managing the escrow account, including both accounting and reporting requirements.

## **6.1 THE ESCROW ACCOUNT**

### **6.1.A OVERVIEW**

- (1) As an integral incentive to the FSS program, it is very important to have clear-cut policy spelling out how the escrow account works.
- (2) This includes policy regarding the calculation of the FSS credit amount, the disbursement of FSS account funds, the use of account funds for homeownership and forfeiture of the FSS escrow account.

## 6.1.B CALCULATING THE FSS CREDIT AMOUNT

- (1) For FSS families who are very low-income families, the FSS credit is the lesser of 30 percent of current monthly adjusted income less the family rent, or the current family rent less the family rent at the time of the effective date of the contract of participation.
  - (a) The family rent is obtained by disregarding any increases in earned income (as defined in 24 CFR 984.103) from the effective date of the contract of participation.
  - (b) For FSS families who are considered low-income families but not very low-income families, the FSS credit is calculated in the same manner but cannot exceed the amount computed for 50 percent of the median income [24 CFR 984.305(b)(1)].
- (2) FSS families who are not low-income families are not entitled to any FSS credit [24 CFR 984.305(b)(2)].

### (3) **Determination of Family Rent and Total Tenant Payment**

For purposes of determining the FSS credit, *family rent* for the public housing program is the total tenant payment as defined in 24 CFR Part 5, subpart F.

- (a) For the HCV program, *family rent* is 30 percent of adjusted monthly income [24 CFR 984.305(b)(1)].
  - (b) Total tenant payment for a family participating in the public housing FSS program is determined in accordance with the regulations set forth in 24 CFR Part 913.
- (4) **Increases in FSS Family Income [24 CFR 984.304]**

As described in the FSS credit calculations above, any increases in family earned income resulting in increases in family rent become deposited in the escrow account.

- (a) For this reason, and because of the nature of the FSS account, any increase in the earned income of an FSS family during its participation in an FSS program may not be considered as income or a resource for purposes of eligibility of the FSS family for other benefits, or amount of benefits payable to the FSS family, under any other program administered by HUD, unless the income of the FSS family equals or exceeds 80 percent of the area median income (as determined by HUD, with adjustments for smaller and larger families).



(5) **Cessation of FSS Credit [24 CFR 984.305(b)(3)]**

SAHA will not make any additional credits to the FSS family's FSS account when the family has completed the contract of participation, or when the contract of participation is terminated or otherwise nullified.

**6.1.C DISBURSEMENT OF FSS ACCOUNT FUNDS**

(1) **Disbursement at Completion of Contract [24 CFR 984.305(c)(1)]**

When the contract has been completed according to regulation, the amount in an FSS account in excess of any amount the FSS family owes to SAHA will be paid to the head of the FSS family.

- (a) However, in order to receive the disbursement, the head of the FSS family must submit a certification (as defined in §984.103) to SAHA at the time of contract completion that, to the best of his or her knowledge and belief, no member of the FSS family is a recipient of welfare assistance.

(2) **Disbursement before Expiration of Contract Term**

FSS account funds may also be disbursed before the end of the contract term.

- (a) If SAHA determines that the FSS family has fulfilled its obligations under the contract of participation before the expiration of the contract term and the head of the FSS family submits a certification that, to the best of their knowledge, no member of the FSS family is a recipient of welfare assistance, the amount in the family's FSS account in excess of any amount the family owes to SAHA will be paid to the head of the FSS family [24 984.305(c)(2)(i)].

- (3) In addition, SAHA may at its sole option disburse FSS account funds before completion of the contract if the family needs a portion of the funds for purposes consistent with the contract of participation and SAHA determines that the FSS family has fulfilled certain interim goals established in the contract of participation. Such cases could include using the funds to assist the family in meeting expenses related to completion of higher education (e.g., college, graduate school) or job training, or to meet start-up expenses involved in creation of a small business [24 984.305(c)(2)(ii)].

- (a) SAHA will disburse a portion of the FSS escrow account funds before completion of the COP if requested funds are needed in order to complete an interim goal or task within the COP and are not ongoing expenses.

**OR**

The family has demonstrated that the need for one-time payment of otherwise ongoing expenses such as rent, utilities, telephone, cell phone, pager, car payments, car maintenance, insurance, or childcare is needed to complete an interim goal, a final goal, or a task related to such goals.

**(4) Verification of Family Certification at Disbursement**

Interim disbursement may only occur after the family has completed certain interim goals and funds are needed in order to complete other interim goals.

- (a) Final disbursement can only occur after the family has completed the contract of participation and all members are welfare-free as defined by regulation.
- (b) Because of this, it follows that SAHA may require verification for the completion of interim goals or the contract of participation.
- (c) Before final disbursement of the FSS account funds to the family, SAHA may verify that the FSS family is no longer a recipient of welfare assistance by requesting copies of any documents which may indicate whether the family is receiving any welfare assistance, and by contacting welfare agencies [24 CFR 984.305(c)(3)].
- (d) HUD provides verification guidance in Notice PIH 2010-19. This guidance is mandatory for the public housing and housing choice voucher programs.
  - (i) SAHA's ACOP and/or Administrative Plan must contain verification policies following the hierarchy in this notice.
  - (ii) The policies contained in SAHA's ACOP and Administrative Plan cover verification policies related to the FSS program in general.
  - (iii) However, determining the need for interim disbursements may require more clarification as to what constitutes an acceptable third-party source.

- (e) SAHA will require verification that the FSS family has completed certain interim goals, or has completed the contract of participation, and that the FSS family is no longer a recipient of welfare assistance, as relevant, before making any potential interim or final disbursements.

- (f) SAHA will follow HUD's verification hierarchy set forth in Notice PIH 2010-19 to make these verifications.
- (i) However, SAHA will use a knowledgeable professional as a third-party source to verify the need for interim disbursements.

### PHA Policy

The PHA will require verification that the FSS family has completed certain interim goals, or has completed the contract of participation, and that the FSS family is no longer a recipient of welfare assistance, as relevant, before making interim and final disbursements.

The PHA will follow HUD's verification hierarchy set forth in Notice PIH 2010-19 to make these verifications. However, the PHA will use a *knowledgeable professional* as a third-party source to verify the need for interim disbursements.

**If requesting an interim disbursement, the PHA will require verification that the FSS family has completed certain interim goals or the final ITSP goal to date at the time of the request.**

**If requesting a final disbursement, the PHA will require verification that the FSS family has completed certain interim goals and the final ITSP goal, or has completed the contract of participation, and that the FSS family is no longer a recipient of welfare assistance, as relevant, before making final disbursements.** - review committee suggestion to add clarity on verification for interim and final disbursements.

### **(5) Succession to FSS Account [24 CFR 984.305(d)]**

FSS account funds should be disbursed to the head of the FSS family.

- (a) However, if the head of the FSS family no longer resides with the other family members in the public housing or the HCV-assisted unit, the remaining members of the FSS family, after consultation with SAHA, have the right to designate another family member to receive the funds.

#### **6.1.D USE OF FSS ACCOUNT FUNDS FOR HOMEOWNERSHIP**

- (1) According to regulation, a public housing FSS family may use its FSS account funds for the purchase of a home, including the purchase of a home under one of HUD's homeownership programs, or other federal, state, or local homeownership programs, unless the use is prohibited by the statute or regulations governing the particular homeownership program [24 CFR 984.305(e)].
- (2) Homeownership is just one option for use of the FSS account funds.
  - (a) SAHA may not restrict the use of escrow funds at contract completion [Notice PIH 93-24, C-13].

### **6.1.E FORFEITURE OF FSS ACCOUNT FUNDS**

- (1) Amounts in the FSS account will be forfeited when the contract of participation is terminated, or when the contract of participation is completed by the family (see Section 5-II.D. of this action plan) but the FSS family is receiving welfare assistance at the time of expiration of the term of the contract of participation, including any contract extension [24 CFR 984.305(f)(1)].
- (2) **Treatment of Forfeited FSS Account Funds**

Treatment of forfeited FSS account funds differ depending on the type of FSS program SAHA operates.

  - (a) For public housing FSS programs, FSS account funds forfeited by the FSS family will be credited to Other Income and will become part of Unrestricted Net Assets.
  - (b) Forfeited FSS account funds will be counted as other income in the determination of operating subsidy eligibility for the next budget year [24 CFR 984.305(f)(2)(i)].
- (3) In the HCV program, forfeited FSS account funds will be treated as program receipts for payment of program expenses under SAHA's budget for the program, and will be used in accordance with HUD requirements governing the use of program receipts [24 CFR 984.305(f)(2)(i)].

## 6.2 ESCROW FUND ACCOUNTING AND REPORTING

### 6.2.A OVERVIEW

- (1) Regulations set forth specific requirements involving the accounting and reporting for the FSS escrow account.
- (2) This part describes those requirements and SAHA policy necessary for managing the account from SAHA's perspective.

### 6.2.B ACCOUNTING FOR FSS ACCOUNT FUNDS

- (1) When establishing FSS escrow accounts, SAHA must deposit the FSS account funds of all families participating in SAHA's FSS program into a single depository account for each (public housing or HCV) program.
- (2) In addition, the funds held in this account must be invested in one or more of the HUD-approved investments [24 CFR 984.305].
- (3) The total of the combined FSS account funds will be supported in SAHA accounting records by a subsidiary ledger showing the balance applicable to each FSS family.
  - (a) During the term of the contract of participation, SAHA periodically, but not less than annually, credits the amount of the FSS credit (see Section 6.1.B) to each family's FSS account [24 CFR 984.305(a)(2)(i)].

- (b) SAHA will credit the amount of the FSS credit(s) to each family's account on a quarterly basis.

#### (4) **Proration of Investment Income [24 CFR 984.305(a)(2)(ii)]**

- (a) Because the FSS account funds are to be invested, the investment income for those funds in the FSS account will also need to be credited to each family's account.
  - (b) By regulation, these funds are to be prorated and credited to each family's FSS account based on the balance in each family's FSS account at the end of the period for which the investment income is credited.

- (c) Each year the full amount of the investment income for funds in the PH and HCV FSS account will be prorated and credited to each family's subsidiary line item after the deduction of unpaid rent and other amounts due under the PH or HCV-assisted lease.

(5) **Reduction of Amounts Due by FSS Family [24 CFR 984.305(a)(2)(iii)]**

If the FSS family has not paid the family contribution towards rent, or other amounts, if any, due under the public housing or HCV-assisted lease, the balance in the family's FSS account shall be reduced by that amount (as reported by the owner to SAHA in the HCV FSS program) before prorating the interest income.

- (a) If the FSS family has underreported income, no reduction will be made to the escrow account and the amount credited to the FSS account will be based on the income amounts originally reported by the FSS family.

**6.2.C REPORTING ON THE FSS ACCOUNT**

- (1) SAHA is required to make a report, at least once annually, to each FSS family on the status of the family's FSS account.

- (2) At a minimum, the report must include [24 CFR 984.305(a)(3)]:

- The balance at the beginning of the reporting period;
- The amount of the family's rent payment that was credited to the FSS account, during the reporting period;
- Any deductions made from the account for amounts due SAHA before interest is distributed;
- The amount of interest earned on the account during the year;
- The total in the account at the end of the reporting period;

- (a) SAHA will provide FSS participants an annual statement on the status of their FSS escrow account.



## **FAMILY SELF-SUFFICIENCY ACTION PLAN**

# **CHAPTER 7**

## **PORTABILITY IN HOUSING CHOICE VOUCHER FSS PROGRAMS**



## **CHAPTER 7: PORTABILITY IN HOUSING CHOICE VOUCHER FSS PROGRAMS**

PHAs operating HCV FSS programs must be familiar with the rules and regulations regarding portability under the housing choice voucher program. As with the case of portability in the HCV program in general, the FSS family may move outside the initial PHA jurisdiction under portability procedures after the first 12 months of the FSS contract of participation [24 CFR 984.306].

In the event that an FSS family chooses to exercise portability, certain special requirements regarding the FSS program would apply. This chapter describes the obligations of the initial PHA, the receiving PHA, and the FSS family under portability, in addition to any special stipulations regarding portability in the FSS context.

This chapter contains two parts:

### **PART 1: Portability in the FSS Program**

This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

### **PART 2: The Effects of Portability on FSS Regulations and Policy**

This part describes the specific ways in which portability affects different aspects of the FSS program, including the escrow account, program termination, loss of the FSS account, and termination of HCV program assistance.

## 7.1 PORTABILITY IN THE FSS PROGRAM

### 7.1.A. OVERVIEW

- (1) Portability is a statutory feature of the housing choice voucher program—it is included in the law.
- (2) As such, PHAs operating an HCV FSS program need to understand the effects that portability will have on HCV FSS families and program operation.
- (3) This part provides a general overview of portability in the FSS program, including the residency requirements for FSS portability and management of the contract of participation when a family moves into or from another PHA's jurisdiction.

### 7.1.B. DEFINITIONS

For the purposes of portability with regards to the FSS program, the following definitions will be used [24 CFR 982.4, 24 CFR 984.306]:

- (1) **Initial PHA** means both:
  - (a) A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and
  - (b) A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.
- (2) **Receiving PHA** means a PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA either absorbs the family into its program, including issuing a voucher and providing rental assistance to the family, or bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher.
- (3) **Relocating FSS Family** refers to an FSS family that moves from the jurisdiction of a PHA at least 12 months after signing its contract of participation.

### 7.1.C. RESIDENCY REQUIREMENTS

- (1) Families participating in an HCV FSS program are required to lease an assisted unit within the jurisdiction of the PHA that selected the family for the FSS program for a minimum period of 12 months after the effective date of the contract of participation.

- (a) However, the initial PHA may approve a family's request to move outside its jurisdiction under portability during this period [24 CFR 984.306(b)(1)].

- (3) SAHA will approve a family's request to move outside its jurisdiction under portability during the first 12 months after the effective date of the contract of participation only as needed for training, education, employment, support services or to meet personal family needs.
- (4) Relocation and portability from SAHA's HCV program are subject to HUD regulations and SAHA's Housing Choice Voucher program policy.
  - (a) For additional information on applicable policy, see "SAHA's Relocation Plan" in Sec. 12.2.E of the Administrative Plan.

- (5) After the first 12 months of the FSS contract of participation, the FSS family may move outside the initial PHA jurisdiction under portability procedures regardless of PHA approval [24 CFR 984.306(b)(2)].

#### **7.1.D. Contract Of Participation**

- (1) Once a family moves outside the initial PHA's jurisdiction, a determination will need to be made regarding whether the family will continue to participate in the initial PHA's FSS program or whether it will participate in the FSS program of the receiving PHA.

- (2) **Continued Participation in the FSS program of the Initial PHA**

A relocating FSS family may continue in the FSS program of the initial PHA if the family demonstrates to the satisfaction of the initial PHA that, notwithstanding the move, the relocating FSS family will be able to fulfill its responsibilities under the initial or modified contract of participation at its new place of residence.

- (a) For example, this could mean that the FSS family may be able to commute to the supportive services specified in the contract of participation, or the family may move to obtain employment as specified in the contract [24 CFR 984.306(c)].

- (3) SAHA will approve a relocating family's request to continue in its FSS program if the family reasonably demonstrates that, notwithstanding the move, the relocating FSS family will be able to fulfill its responsibilities under the existing or modified contract of participation at their new place of residence.

(4) Relocation and portability from SAHA's HCV program are subject to HUD regulations and SAHA's Housing Choice Voucher program policy.

(a) For additional information on applicable policy, see "SAHA's Relocation Plan" in Sec. 12.2.E of the Administrative Plan.

(5) Should the relocating family stay in the initial PHA's FSS program, there will be only one contract of participation. This will be the same contract as originally executed by the initial PHA [24 CFR 984.306(c)(2)].

(6) **Participation in the FSS Program of the Receiving PHA**

When a family moves into the jurisdiction of another PHA, the relocating FSS family may participate in the FSS program of the receiving PHA if the receiving PHA allows the family to do so. However, a PHA is not obligated to enroll a relocating FSS family in its FSS program [24 CFR 984.306(d)(1)].

(7) SAHA, as the receiving housing authority, will allow a relocating FSS family to participate in its FSS program if an open slot is available at the time of relocation.

(8) Relocation and portability from SAHA's HCV program are subject to HUD regulations and SAHA's Housing Choice Voucher program policy.

(a) For additional information on applicable policy, see "SAHA's Relocation Plan" in Sec. 12.2.E of the Administrative Plan.

(8) In cases where the receiving PHA allows the relocating FSS family to participate in its FSS program, the receiving PHA will enter into a new contract of participation with the FSS family for the term remaining on the contract with the initial PHA.

(9) The initial PHA will then terminate its contract of participation with the family [24 CFR 984.306(d)(2)].

## **7.2 THE EFFECTS OF PORTABILITY ON FSS REGULATIONS AND POLICY**

### **7.2.A. Overview**

- (1) The regulations set forth under the FSS program will sometimes be affected by the regulations of the public housing and housing choice voucher programs.
- (2) Portability, as an integral part of the housing choice voucher program, is an excellent example of how HCV regulations can in turn affect FSS program operation.
- (3) This part describes the specific ways in which portability affects different aspects of the FSS program, including the escrow account, program termination, and loss of the FSS account.

### **7.2.B. Portability And The Escrow Account [24 CFR 984.306(e)]**

- (1) The escrow account is one aspect of the FSS program that could present an issue if a participant family decides to move under portability because the family's account is administered by the initial PHA.
- (2) Regardless of whether the relocating FSS family remains in the FSS program of the initial PHA or is enrolled in the FSS program of the receiving PHA, FSS regulations specify that there will be a single FSS account to be maintained by the initial PHA so long as the initial PHA is ultimately paying the housing assistance payment.
- (3) However, when an FSS family is absorbed by the receiving PHA, the initial PHA transfers the family's FSS account to the receiving PHA, and the receiving PHA begins administering the account.

### **7.2.C. Program Termination, Loss of FSS Account and Termination of HCV Assistance**

- (1) Another point of consideration for PHAs is non-compliance with the contract of participation when the FSS participant family moves outside of SAHA's jurisdiction.
  - (a) In such cases, non-compliance with the contract is treated the same under portability as it is if the non-compliance occurred in the initial PHA's jurisdiction.
  - (b) According to the regulatory language, if an FSS family that relocates to another jurisdiction is unable to fulfill its obligations under the contract of participation (or any modifications to the contract), the PHA administering the contract may terminate the

FSS family from the FSS program and the family's FSS account will be forfeited [24 CFR 984.306(f)(1)].

- (c) PHAs are no longer permitted to terminate a family's HCV program assistance if the family fails to meet its obligations under the contract of participation [FR Notice 12/29/14].

- (2) SAHA policy regarding the consequences of non-compliance with the FSS contract of participation can be found in Section 5.I.D. of this Action Plan.
  - (a) **“Good cause”** is likewise defined in this section.
- (3) Relocation and portability from SAHA's HCV program are subject to HUD regulations and SAHA's Housing Choice Voucher program policy.
  - (a) For additional information on applicable policy, see “SAHA's Relocation Plan” in Sec. 12.2.E of the Administrative Plan.

- (2) SAHA policy regarding the consequences of non-compliance with the FSS contract of participation can be found in Section 5.I.D. of this Action Plan.
  - (a) **“Good cause”** is likewise defined in this section.
- (3) In the event of forfeiture of the family's FSS account, the funds in the family's FSS account will revert to the PHA maintaining the FSS escrow account for the family [24 CFR 984.306(f)(2)].

## APPENDIX E: ASSET MANAGEMENT PLAN

The Asset Management Plan outlines how the Agency plans to make best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy and supporting the Agency's 2025 Strategic Plan.

The Asset Management Plan generally covers the five-year period spanning from FY 2021-22 to FY 2025-26. In addition to updating the five-year plan every year, the Agency also may make adjustments to respond to business needs.

To that end, the Agency may consider unique, opportunistic, and unscheduled acquisitions, dispositions, and/or new development projects that are not included in this plan, but are supportive of the Agency's 2025 Strategic Plan.

Such activities will not be considered significant amendments to the MTW plan, provided the following internal protocols are followed:

1. Completion of analysis describing the cost and benefits of the contemplated action
2. Consultation with other agency plans
3. Approval by ELT (and appropriate committee and Board of Commissioners if necessary)
4. The financial impact or cost of the activity is 5% or less of the annual expenses reflected in the current approved annual budget for the agency.

The Asset Management Plan encompasses preservation activities in the Low Income Public Housing and Beacon Communities housing portfolios as well as real estate development activity. The plan is organized as follows:

1. **Housing Preservation: Capital Improvement Plans**  
Details the Agency's plans to preserve affordable housing units through capital improvement plans for the Low Income Public Housing and Beacon Communities portfolios.
2. **Housing Expansion: New Housing Development Plans**  
Details the Agency's development plans for real estate assets currently or anticipated to be owned by the San Antonio Housing Authority or its affiliates.
3. **Acquisitions: Asset Acquisition Plans**  
Details the Agency's plans to acquire real estate assets to be owned by the San Antonio Housing Authority or its affiliates.
4. **Dispositions: Asset Disposition Plans**  
Details the Agency's plans to dispose of real estate assets currently owned by the San Antonio Housing Authority or its affiliates.
5. **Other Real Estate Holding**  
Provides a listing of the Agency's real estate assets that do not currently have development or acquisitions plans.



## 1. Housing Preservation: Capital Improvement Plans

Information below may change and all plans are subject to funding and separate Board approval.

### A. Public Housing Five Year Capital Improvement Plan

Over the next five (5) years, the Agency plans to invest approximately \$17 million in capital repairs to extend the useful life at 26 properties and approximately 2,253 housing units. Projected funding for capital improvements is based on historical grants and forecasted capital fund appropriations by HUD. As a result, the five-year plan is a rolling plan and updated every year or as additional needs and funding amounts become available.

The table below outlines current property-specific preservation plans in addition to the five-year capital improvement plan (FY 2021 - FY 2026).

Fiscal Year (FY) <sup>1</sup> Capital Fund Grant Year (CFP)	Property	Units Preserved <sup>2</sup>	Description	Planned Investment (\$) <sup>3</sup>
<b>FY 2020-21</b> <b>CFP20</b> <b>(Current)</b>	Alazan	1	Fire Damage Unit Rehab	130,000
	Blanco	100	Chiller Replacement and Upgrade	228,277
	Madonna	60	Boiler and Gas Line Replacement	2,000,000
	Park View	153	Elevator Doors/Structural Exterior Repairs	580,602
	Pin Oak I	50	Elevator Repair	24,680
	San Pedro Arms	16	Elevator Repair	31,005
	Villa Tranchese	201	Asbestos Consultant Services	152,065
	Victoria Plaza	185	Fire Communications System/Fire Dept. Connection	69,925
		<b>766</b>		<b>3,216,554</b>
<b>FY 2021-22</b> <b>CFP21</b>	Cassiano	499	Foundation Repairs	200,000
	Cross Creek	66	Parking Lot Repairs	120,000
	Highview	68	Storm Drainage	161,200
	Mirasol Homes	174	Roof Repairs/Replacement	1,209,800
	South San Apts.	30	Drainage Repairs	161,200

<sup>1</sup> SAHA fiscal years run from July 1 to June 30th. For example, FY2020 begins on July 1, 2019 and ends on June 30, 2020. Capital Fund Grants are awarded to SAHA every year. SAHA then allocates funds based on capital needs.

<sup>2</sup> Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non strategic assets and net loan proceeds from refinances (Beacon)). Includes major capital items that impact or extend the useful life expectancy of the asset, major systems, or site components (ex. foundations, building envelope (siding, windows, doors, roofs), HVAC systems, water/sewer, electrical, paving, lighting, major interior upgrades to units and common areas. For example, if three roofs are replaced, only units in those buildings will be counted as preserved. However, if the project impacts all units, ex foundation repair or sewer line repairs, all units will be counted as preserved.

<sup>3</sup> Funding sources may be a combination of CFP, MTW, Cares Act, sale net proceeds and insurance proceeds.





	T.L. Shaley	66	Foundation Repairs	280,000
	Villa Veramendi	166	Roof Repairs/Replacement	950,000
		<b>1069</b>		<b>3,082,200</b>
<b>FY 2022-23</b>	Francis Furey	66	Substantial renovation	2,500,000
<b>CFP22</b>	Le Chalet	34	Substantial renovation	1,275,000
		<b>100</b>		<b>3,775,000</b>
<b>FY 2023-24</b>	Morris Beldon	35	Substantial renovation	912,000
<b>CFP23</b>	College Park	78	Substantial renovation	800,000
		<b>113</b>		<b>1,712,000</b>
<b>FY 2024-25</b>	Kenwood North	53	Substantial renovation	930,000
<b>CFP24</b>	Midway	20	Substantial renovation	700,000
	Olive Park	26	Substantial renovation	1,800,000
		<b>99</b>		<b>3,430,000</b>
<b>FY 2025-26</b>	Linda Lou	10	Substantial renovation	200,000
<b>CFP25</b>	Matt Garcia	55	Substantial renovation	650,000
	Park Square	26	Substantial renovation	990,000
	Williamsburg	15	Substantial renovation	657,400
		<b>106</b>		<b>2,497,400</b>
<b>GRAND TOTAL</b>		<b>2,253</b>		<b>17,713,154</b>

## B. Energy Performance Contract (EPC):

An EPC is a HUD approved program, which allows a Public Housing Authority to finance energy and water conservation measures and capital improvements through future utility cost savings.

The San Antonio Housing Authority (SAHA) and its Board of Commissioners elected and approved the process to begin the pre-development phase of a U.S. Housing and Urban Development (HUD) approved EPC where SAHA will spend pre-development funds associated with technical assistance services including, but not limited to engineering, legal, consultants, and other services necessary to achieve project financing and HUD approval. Upon financial closing of the EPC transaction, HUD EPC regulations allow SAHA to be reimbursed for expenditures associated with pre-development services.

SAHA's EPC is estimated to generate about \$16.5 million of utility savings, over a fifteen year term, with a net present value of \$8.3 million in project funds, which will be sourced through an anticipated tax exempt municipal lease purchase agreement. The soft and hard costs associated with installing energy conservation measures (ECM) will be funded by bank debt which will be serviced by energy cost savings.

SAHA's EPC will include high efficient lighting, high efficient plumbing fixtures, solar panels, roofs, windows, HVAC plant upgrades, and bathroom exhaust fans across 34 public housing



developments (various building types) equating to 2,324 dwelling units. The approximate time for completion is one year.

### C. Beacon Communities Five Year Capital Improvement Plan

In the coming years, the Agency plans to invest approximately \$26 million in capital repairs to extend the useful life at 21 properties and approximately 2,901 units in the Beacon Communities portfolio. In addition, this portfolio will be expanded as properties in the Agency's Partnership portfolio come to the end of their 15-year affordability period and transition ownership to SAHA. As a result of these property transitions, the capital plan is expected to change to include these new properties.

Projected funding for capital improvements in the Beacon Communities portfolio is based on operating funds, new or refinanced debt on the property, or insurance proceeds where applicable. The tables below outline current property-specific preservation plans.

Fiscal Year <sup>4</sup>	Property	Units Preserved <sup>5</sup>	Description	Planned Investment (\$)
2020-2021	Castle Point	220	Comprehensive Modernization, Paint trim, restripe parking	3,827,588
	Churchill Estates	40	Repair Parking Lot/Drive (proceeds share from Burning & Encanta refi)	1,500,000
	Courtland Heights	56	Pool decking, site work,landscape,covered parking	30,000
	Dietrich Rd	30	Shore up patios, replace damaged siding, parking lot improvements, landscaping	52,000
	Encanta Villa	56	Rehab, playground updates, repaint trim & railings	1,500,000
	La Providencia	90	Plumbing, exterior, parking, roofs, HVAC, pool, fencing	1,500,000
	Pecan Hill	100	Sewer/ site drainage repairs and tree plan, foundation repairs (based on movement study), roof repairs, stucco wall support eval and comprehensive repair, add HVAC, elevators, parking lot stripe and resurface	1,000,000
	Reagan West	15	Roof/Driveway	100,000
	Villa de San Alfonso	29	Paint trim, update community room, elevator maintenance	30,000

<sup>4</sup> SAHA fiscal years run from July 1 to June 30th. For example, FY2020 begins on July 1, 2019 and ends on June 30, 2020.

<sup>5</sup> Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non strategic assets and net loan proceeds from refinances (Beacon)). Includes major capital items that impact or extend the useful life expectancy of the asset, major systems, or site components (ex. foundations, building envelope (siding, windows, doors, roofs), HVAC systems, water/sewer, electrical, paving, lighting, major interior upgrades to units and common areas. For example, if three roofs are replaced, only units in those buildings will be counted as preserved. However, if the project impacts all units, ex foundation repair or sewer line repairs, all units will be counted as preserved.



	Woodhill	532	Develop 24, (possible refi year 3 \$2M) replace copper wiring and siding	900,000
		<b>1,168</b>	<b>TOTAL</b>	<b>10,439,588</b>
<b>2021-2022</b>	Bella Claire	67	Parking Improvements - Patch-Seal-Stripe, fencing, signage	25,000
	Burning Tree	108	Rehab, fencing, pool	2,000,000
	Converse Ranch I	124	Drainage repairs (Berin/Swale), pool, restripe parking	20,000
	Cottage Creek I	253	Electrical wall packs/cameras/utility room repairs, parking and sidewalk repairs, update fencing, pool resurfacing	425,000
	Cottage Creek II	196	Parking lot/sidewalk repairs, update fencing, pool resurfacing	175,000
	Courtland Heights	56	Pool decking, site work,landscape,covered parking	50,000
	Crown Meadows	192	Fencing, parking lots, paint exterior, pool	40,000
	Homestead	157	Property rehab	3,000,000
	La Providencia	90	Plumbing, exterior, parking, roofs, HVAC, pool, fencing	25,000
	Monterrey Park	200	Fencing, paint trim	30,000
	Sunshine Plaza	100	Rehab including windows, doors, elevators, add HVAC, water heaters, parking lot drainage	2,000,000
	Towering Oaks	128	Restripe Parking	10,000
	Villa de San Alfonso	29	Paint trim, update community room, elevator maintenance	40,000
	Villa de Valencia	104	HVAC Replacement (possible refi year 3 based on change of ownership research \$1.5M) rehab including boilers, fencing, retaining walls, and pool, ext paint	300,000
		<b>1,804</b>	<b>TOTAL</b>	<b>8,140,000</b>
<b>2022-2023</b>	Bella Claire	67	Parking Improvements - Patch-Seal-Stripe, fencing, signage	15,000
	Converse Ranch I	124	Drainage repairs (Berin/Swale), pool, restripe parking	25,000
	Cottage Creek I	253	Electrical wall packs/cameras/utility room repairs, parking and sidewalk repairs, update fencing, pool resurfacing	10,000
	Cottage Creek II	196	Parking lot/sidewalk repairs, update fencing, pool resurfacing	10,000
	Courtland Heights	56	Pool decking, site work,landscape,covered parking	86,000
	Crown Meadows	192	Fencing, parking lots, paint exterior, pool	40,000
	Encanta Villa	56	Rehab, playground updates, repaint trim & railings	15,000
	Pecan Hill	100	Sewer/ site drainage repairs and tree plan, foundation repairs (based on movement study), roof repairs, stucco wall support eval and comprehensive repair,	2,100,000

#### APPENDIX E: Asset Management Plan



			add HVAC, elevators, parking lot stripe and resurface	
	Villa de Valencia	104	HVAC Replacement (possible refi year 3 based on change of ownership research \$1.5M) rehab including boilers, fencing, retaining walls, and pool, ext paint	1,500,000
	Woodhill	532	Develop 24, (possible refi year 3 \$2M) replace copper wiring and siding	2,000,000
		<b>1,680</b>	<b>TOTAL</b>	<b>5,801,000</b>
<b>2023-2024</b>	Burning Tree	108	Rehab, fencing, pool	30,000
	Castle Point	220	Comprehensive Modernization, Paint trim, restripe parking	85,000
	Converse Ranch I	124	Drainage repairs (Berin/Swale), pool, restripe parking	20,000
	Converse Ranch II	104	Restripe parking	20,000
	Crown Meadows	192	Fencing, parking lots, paint exterior, pool	250,000
	Dietrich Rd	30	Shore up patios, replace damaged siding, parking lot improvements, landscaping	12,000
	La Providencia	90	Plumbing, exterior, parking, roofs, HVAC, pool, fencing	20,000
	Pecan Hill	100	Sewer/ site drainage repairs and tree plan, foundation repairs (based on movement study), roof repairs, stucco wall support eval and comprehensive repair, add HVAC, elevators, parking lot stripe and resurface	40,000
	Woodhill	532	Develop 24, (possible refi year 3 \$2M) replace copper wiring and siding	1,000,000
		<b>1,500</b>	<b>TOTAL</b>	<b>1,477,000</b>
<b>2024-2025</b>	Bella Claire	67	Parking Improvements - Patch-Seal-Stripe, fencing, signage	10,000
	Burning Tree	108	Rehab, fencing, pool	25,000
	Crown Meadows	192	Fencing, parking lots, paint exterior, pool	25,000
	Encanta Villa	56	Rehab, playground updates, repaint trim & railings	70,000
	Monterrey Park	200	Fencing, paint trim	80,000
		<b>623</b>	<b>TOTAL</b>	<b>210,000</b>
<b>GRAND TOTAL</b>		<b>2,901</b>		<b>26,067,588</b>

## 2. Housing Expansion: New Housing Development Plans

The San Antonio Housing Authority's mission is centered around bringing housing solutions to the residents of San Antonio. Opportunity housing is ensuring affordable housing options are available to any resident who cannot afford renting at market rate.

The agency is pursuing more than \$1 billion in prospective housing developments to add approximately 6,000 units to the rental market. Due to the breadth of this effort, the SAHA Board of Commissioners established a Real Estate Development Committee that began meeting monthly in November 2020.



Information on development projects summarized below is current as of the drafting of this plan. Development plans may change and all are subject to funding and separate committee and full Board approvals at various points in the development process. Updated information on development projects is available through public notices accessible here: <https://saha.org/business/about-saha/public-notices/>

Financing Closed (under Construction)													
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix					
								30%	40%	50%	60%	70%	80% Market
1604 Lofts	D2	NRP	4% Tax Credits & Bonds	Closed	\$56,663,651	324		33		0	224		67 0
Aspire at Tampico <sup>12</sup>	D5	Mission DG	4% Tax Credits & Bonds	Closed	\$33,392,549	200		9	10	18	70	20	9 64
Trader Flats (The Scott)	D4	NRP	4% Tax Credits & Bonds	Closed	\$56,012,579	324		33		0	224		67 0
Artisan at Ruiz	D1	Franklin	9% Tax Credits	Closed	\$21,165,791	102		11		41	50		0 0
Majestic Ranch	D7	Hogan	4% Tax Credits & Bonds	Closed	\$46,084,260	288		0		0	288		0 0
Culebra Crossing	D6	Lynd	HUD 221(d)(4)	Closed	\$50,123,889	327		0		0	0		164 163
Mira Vista	D7	Hogan	4% Tax Credits & Bonds	Closed	\$45,296,164	312		0		0	312		0 0
Kitty Hawk Flats	Converse	NRP	4% Tax Credits & Bonds	Closed	\$40,503,098	212		22		0	135	55	0
Legacy at Alazan <sup>12</sup>	D5	NRP	9% Tax Credits	Closed	\$19,155,261	88	40				40		0 8
100 Labor	D1	Franklin	HUD 221(d)(4)	Closed	\$52,302,614	213		27		17	0		0 169
<b>Total</b>					<b>\$420,699,856</b>	<b>2,390</b>	<b>40</b>	<b>135</b>	<b>10</b>	<b>76</b>	<b>1,343</b>	<b>75</b>	<b>307 404</b>

Board Provided Final Approval													
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix					
								30%	40%	50%	60%	70%	80% Market
St. John's Square <sup>2</sup>	D1	Weal	4% Tax Credits & Bonds	Pending New Bond	\$71,547,459	252		0		54	0		0 198

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				Reservati on										
Potranco	D4	Lynd	Conventional Loan	Pending	\$50,945,546	360		0	0	36	144	180		
Josephine	D1	Lynd	Conventional Loan	Pending	\$61,339,167	259		0	0	26	104	129		
Total					\$183,832,172	871	0	0	0	54	62	0	248	507

Board Approved Bond Inducement														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Watson Road	D4	NRP	4% Tax Credits & Bonds	4/2021	\$59,925,939	348			18	18	294	18	0	0
Copernicus	D2	NRP	4% Tax Credits & Bonds	4/2021	\$56,064,279	318			17	17	267	17	0	0
Old Pearsall Flats	D4	Streamline	4% Tax Credits & Bonds	Pending- has 3 yr carryfor ward	\$52,501,266	348		34	26	20	200	68	0	0
Bristol at Somerset	D4	Poppoon	4% Tax Credit & Bonds	Pending	\$56,048,000	336		0	0	0	336	0	0	0
The Granada	D1	Mission DG	4% Tax Credit & Bonds	Pending	\$51,000,000	249		137	45	14	TBD		TBD	TBD
Artisan at Springview <sup>12</sup>	D2	Franklin	4% Tax Credits & Bonds	Pending	\$57,000,000	305		31		0	274		0	0
Total					\$332,539,484	1,904	0	202	106	69	1,371	103	0	0

Board Approved the Developer														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Victoria Courts Midrise <sup>1</sup>	D1	Catellus	TBD	Pending		TBD		TBD		TBD	TBD		TBD	TBD
Victoria Courts Townhomes <sup>1</sup>	D1	Catellus	TBD	Pending		TBD		TBD		TBD	TBD		TBD	TBD
Horizon Pointe	D2	Integrated Realty Group	4% Tax Credits & Bonds	Pending	\$55,303,666	312		20	35	106	0	151	0	0

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Snowden Road <sup>1,2</sup>	D7	SAHA	9% Tax Credits	Pending	\$21,517,120	135								135
Fiesta Trails <sup>2</sup>	D8	NRP	9% Tax Credits	Pending	\$20,389,133	74		7		39	28			
<b>Total</b>					<b>\$97,209,919</b>	<b>521</b>	<b>0</b>	<b>27</b>	<b>35</b>	<b>145</b>	<b>163</b>	<b>151</b>	<b>0</b>	<b>0</b>

Pending Board Consideration														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Alazan Courts <sup>1,2</sup>	D5	TBD	TBD	Pending										
Flores	D1	Mission DG	TBD	Pending		403		46		61	0	75	61	160
<b>Total</b>						<b>403</b>	<b>0</b>	<b>46</b>	<b>0</b>	<b>61</b>	<b>0</b>	<b>75</b>	<b>61</b>	<b>160</b>

<b>Grand Total</b>					<b>\$1,034,281,431</b>	<b>6,089</b>	<b>40</b>	<b>410</b>	<b>151</b>	<b>405</b>	<b>2,939</b>	<b>404</b>	<b>616</b>	<b>1,071</b>
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<sup>1</sup>SAHA owned land

<sup>2\*\*</sup>Planned use of MTW funds

## ALAZAN COURTS REDEVELOPMENT PLAN

The Agency has cancelled its contract with a private developer to begin the master planning of the redevelopment of 501 public housing units at Alazan Courts. The original plan was to demolish the Alazan buildings in two phases. While the Agency still plans to demolish Alazan and develop new housing in its place; a decision has been made to step back from the original two-phased approach and evaluate alternatives that would alleviate economic hardship and stress for existing residents as a result of a relocation. Alternatives will likely include developing more slowly, allowing for more phases to prevent displacement of residents, and to maintain or increase the number of public housing units.

In anticipation of the demolition, SAHA has already begun construction on three developments within the west side community in order to utilize those units for relocation of residents that wish to stay in the neighborhood. These three sites are Artisan at Ruiz (102 multi-family units), Alazan Lofts (88 multi-family units) which is located directly adjacent to the Alazan courts, and Tampico Apartments ( 200 multi-family units). SAHA proposes utilizing MTW funds to cover relocation costs and will also be seeking Tenant Protection Vouchers (TPV) to assist with the relocation process.



### 3. Dispositions: Asset Disposition Plans

The Agency has a number of planned dispositions. Information below may change and all plans would be subject to separate Board approval.

Plan	Property ID	Property Address
<b>Post Auction/RTC/Former Lease-Purchase Portfolio Disposition</b>	314106	7250 GLEN MIST
	441311	1071 POINSETTIA ST
	115411	1411 MONTANA
<b>Vacant Land (Rex Site)</b>	109402, 109403	550 BROOKLYN

### 4. Acquisitions: Asset Acquisition Plans

The Agency has no active acquisition plans, but did complete one unplanned acquisition in FY2021.

### 5. Other Real Estate Holdings

Below is a list of real estate holdings that may be subject to future development or disposition.

Property IDs	PROPERTY ADDRESS
409213, 409067, 409083, 409198	3940 San Fernando
124452	1706 Cincinnati
115595	Springview 2603 Ezell
115597	Springview 2603 Ezell
115600	Springview 2607 Ezell
115602	Springview 2944 E. Commerce
115603	Springview Ezell (Easement Land)
115790	Springview 202 Garcia St.
115610	Springview Garcia St
115582	Springview 2407 Ezell
115583	Springview 2411 Ezell
115588	Springview 2902 E. Commerce
115589	Springview 2906 E. Commerce
115590	Springview 2910 E. Commerce
115807	Springview 651 S. Rio Grande
141735	509 Saltillo St
551676	1822 Arboleda St





## APPENDIX F: THIRD-PARTY LEASE AGREEMENTS

*PHA Plan (Annual Plan). PHAs are generally required to include third-party agreements in their PHA Plans or Significant Amendments to their PHA Plans, based on PHA requirements at 24 CFR part 903. For instance, PHAs are required to include third-party agreements for social services in their PHA Plan. Similarly, PHAs are required to include third-party agreements that generate non-rental income in their PHA Plan as a discussion of financial resources and planned uses of those resources. See 24 CFR part 903.7(c).*

Appendix E is reserved for documentation associated with PIH 2017-24. Upon execution of leases executed after the release of PIH 2017-24, lease information will be listed here.

Generally, funds from third-party leases are used to offset operational costs in their respective property.

