



ADAI Moving to Work ANNUAL PLAN

Housing Authority of the County of San Bernardino



Building Communities Changing Lives

MTW DESIGNATED AGENCY



BOARD of





Tim Johnson CHAIR



Beau Cooper VICE CHAIR



Sylvia Miller



Cassie MacDuff



Jessie Muñoz



Dr. Ciriaco "Cid" **Pinedo**



Bobby Tarango



OUR MISSION

The Housing Authority of the County of San Bernardino empowers all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

OUR VISION

The Housing Authority of the County of San Bernardino is committed to creating a world in which all people have a stable and enriched quality of life.

CORE VALUES

Respect

We believe that all people should have a stable and enriched quality of life and should be afforded the opportunity to not only survive, but to thrive in environments that are sensitive to and encourage respect and empathy for individual circumstances.

Safety

We believe that all residents deserve a safe and secure living environment that is crime- and distraction-free and where families can feel good about raising their children and seniors can enjoy a high quality of life.

Integrity

We believe that there is a strong, mutually reinforcing connection between the integrity of our staff/programs and the success of our clients. Integrity-building within our organization is key to fulfilling our mission statement.

Service

We believe that in order to be successful, we must serve the public by being effective stewards of its financial resources and by developing a customer service business model based on benchmarks and measurements.



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Section I: Introduction

For over 70 years, the Housing Authority of the County of San Bernardino (HACSB) has been a leading provider of affordable housing in the County of San Bernardino. The County of San Bernardino is the largest county in the contiguous United States, consisting of 24 cities and covering over 20,000¹ square miles. San Bernardino County is home to more than 2.17 million individuals². The County population is estimated to have grown by 6.7%² between 2010 and 2018 and is expected to increase by an additional 28%¹ between 2020 and 2045. HACSB proudly serves more than 25,000 people, most of whom are seniors, disabled individuals, and children. We strive to make a positive difference in the lives of the families we assist. Our core values of respect, safety, integrity, and service guide our interaction with every customer.

We envision our program as a stepping stone, providing housing stability to the families we serve on their path to economic independence. Though our resources are limited, we have developed strong partnerships with community partners, government agencies, employment service providers, and institutions of higher education to help those resources stretch further and provide our customers with more than housing. These partnerships are instrumental to upholding our agency motto of *Building Communities*, *Changing Lives*.

At the time of this writing, the COVID-19 pandemic is ongoing. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. In addition to these social distancing measures, HACSB received approval through our FY 2020 Annual MTW Plan, Amendment 2, to implement temporary emergency operations procedures for certain approved MTW activities. Those emergency operations are described in Section IV of this Plan.

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¹ San Bernardino County 2019 Community Indicators Report

² Census Quick Facts Online: https://www.census.gov/quickfacts/fact/table/sanbernardinocountycalifornia,US/PST120219

Mission

Empower all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

Vision

HACSB is committed to creating a world in which all people have a stable and enriched quality of life.

Values

HACSB strives to be a key participant in supporting and improving the community it serves. HACSB seeks to streamline its programs and establish a higher standard of services to the community. Our core values of respect, safety, integrity and service will guide us in accomplishing our Mission and Vision.

What is "Moving to Work"?

Moving to Work (MTW) is a U.S. Department of Housing and Urban Development (HUD) demonstration program begun in 1996. The MTW designation allows housing authorities to waive certain statutes and HUD regulations in order to design and test innovative strategies targeted to address local needs. These strategies are referred to as MTW activities or initiatives. MTW activities must aim to achieve at least one of the three statutory goals of the MTW demonstration program: increase housing choice for low-income families, encourage households to pursue self-sufficiency, and improve administrative and operational cost effectiveness.

HACSB received its MTW designation in 2008, and in April 2016 the 10-year designation was extended through 2028. Since becoming a MTW agency, HACSB has developed and received HUD approval for 27 MTW initiatives to test strategies to improve housing services, assist families on their path to economic self-sufficiency, and to better meet unique local challenges and needs.

What is in this plan?

This Annual Moving to Work Plan complies with the format required by the U.S. Department of Housing and Urban Development (HUD) as outlined in the 2008 Amended and Restated Moving to Work (MTW) Agreement between HUD and HACSB, and also complies with the requirements set forth by HUD in the current approved Form 50900. Information is organized into the following sections:

- Section I: Introduction provides information about HACSB's short term and long-term goals and accomplishments.
- Section II: General Housing Authority Operating Information provides an overview of the agency's housing portfolio, leasing rates, and wait list information.

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- Section III: Proposed MTW Activities contains proposed new MTW activities and/or proposed changes to previously approved MTW activities. Previously approved activities are included in this section if the proposed modification is a substantial change requiring new MTW authorization(s), while minor modifications are contained in Section IV.
- Section IV: Approved MTW Activities provides information on previously approved uses of MTW authority.
- Section V: Sources and Uses of MTW Funds describes the agency's projected MTW revenues and expenditures for the fiscal year, plans for use of the MTW single-fund flexibility, and information about HACSB's local asset management program and participation in the Rental Assistance Demonstration (RAD).
- Section VI: Administrative provides required administrative information, including information about the approval process for this Plan.

MTW Plan	Approved by HUD			
FY 2009	September 25, 2008			
Amendment 1	June 29, 2009			
FY 2010	September 30, 2009			
Amendment 1	November 18, 2009			
Amendment 2	February 22, 2010			
Amendment 3	September 15, 2010			
FY 2011	October 18, 2010			
FY 2012	October 5, 2011			
Amendment 1	November 4, 2011			
FY 2013	September 27, 2012			
FY 2014	May 14, 2014			
FY 2015	February 13, 2015			
Amendment 1A	May 11, 2015			
Amendment 1B	N/A. Proposed changes moved to 2017 MTW Plan.			
Amendment 2	N/A. Proposed changes moved to 2017 MTW Plan.			
FY 2016	November 4, 2015			
FY 2017	February 2, 2017			
Amendment 1	April 3, 2017			
Amendment 2	September 27, 2017			

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FY 2018	October 25, 2017
FY 2019	October 1, 2018
Amendment 1	May 7, 2019
Amendment 2	September 18, 2019
FY 2020	October 16, 2019
Amendment 1	March 18, 2020
Amendment 2	April 3, 2020
Amendment 3	August 10, 2020
FY 2021	Pending approval

MTW Report	Accepted by HUD
FY 2009	April 22, 2010
FY 2010	March 21, 2011
FY 2011	March 20, 2012
FY 2012	July 19, 2013
FY 2013	December 31, 2013
FY 2014	December 31, 2014
FY 2015	December 22, 2015
FY 2016	August 16, 2018
FY 2017	October 9, 2018
FY 2018	October 10, 2019
FY 2019	February 28, 2020
FY 2020	Submitted December 28, 2020; pending acceptance

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Overview of Agency's Goals and Objectives

Long-Term Goals

Prior to our MTW designation in 2008, HACSB completed a 30-year strategic planning process to develop the agency's long-term goals. These goals serve to guide us toward achieving our mission and vision. Our short-term milestones and annual accomplishments mark our progress toward realizing the 30-year strategic goals.

Our strategic 30 years goals are:

	HACSB 30-Year Strategic Goals					
Goal 1:	No eligible family waits longer than 10 days for housing					
Goal 2:	Clients have achieved their own personal level of stability and economic independence					
Goal 3:	For those whom a transition is appropriate, the maximum stay in assisted living is 5 years					
Goal 4:	HACSB leaders and supporters are innovative policy makers and influencers of legislation					
Goal 5:	HACSB has secured the resources needed for accomplishing its mission					
Goal 6:	HACSB is a leading developer and provider of affordable housing in the County of San Bernardino					
Goal 7:	HACSB is adequately staffed with well-trained and fully developed employees					
Goal 8:	HACSB communication is open, honest and consistent					
Goal 9:	HACSB employees have a high level of morale					
Goal 10:	HACSB clients, programs and properties are embraced by all communities					
Goal 11:	HACSB clients live in safe and desirable homes and communities where they can develop and prosper					

The flexibilities provided through our MTW designation assist in our efforts to achieve our long-term goals, and our long-term vision aligns with the statutory objectives of the MTW program. HACSB currently has 27 approved MTW activities. Twelve activities address the objective of operational efficiency, nine assist families with their economic independence efforts, and six help expand housing opportunities. As good stewards of taxpayers' dollars, we ensure optimal use of funds to provide the best quality services to our families. We continually seek to implement innovative solutions that streamline processes, increase efficiency, and help families achieve economic independence. Proactive planning has helped us face the consecutive budget reductions while increasing the number of families served and services provided.

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Short-Term Goals

Our long-term goals align with the MTW statutory objectives and our vision of creating a world in which all people have a stable and enriched quality of life. We achieve MTW objectives by aligning our agency's short-term strategic goals with our MTW goals/objectives-

- Goal 1 Operational efficiency through innovation Maximizing HACSB's economic viability and sustainability through the following strategies:
 - Ensure excellent and efficient stewardship of resources and programs
 - Maintain a workplace environment that attracts and retains capable employees who feel they are making a difference
 - Have an increasingly diverse number of funding sources to provide the programs and services described in the strategic plan
 - Develop a communication program that effectively disseminates information inside and outside the Agency
 - Provide world class customer service

In addition to implementing non-MTW activities to address this goal, we have implemented twelve MTW activities that address this goal (listed in the following table with a statutory objective of "cost effectiveness").

- Goal 2 Develop economically independent clients Facilitating opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy through the following strategies:
 - Develop and maintain policies programs, and services that foster accountability, responsibility and economic independence
 - Transform client mindset from entitlement to empowerment
 - Partner with external organizations to support clients in acquiring life skills, education and training
 - Assist families in strengthening personal accountability and in transitioning to Home Ownership/Market rentals

In addition to implementing non-MTW activities to address this goal, we have implemented nine MTW activities that address this goal (listed under the self-sufficiency statutory objective in the following table).

- Goal 3 Ensure freedom of housing choice Providing quality affordable housing opportunities in mixed-income communities with access to excellent quality of life through the following strategies:
 - Improve and expand HACSB's real estate assets
 - Partner with external organizations to leverage funding and development opportunities
 - Develop innovative programs to expand housing opportunities for under-served populations such as homeless veterans and homeless families with children

In addition to implementing the above non-MTW activities to address this goal, we have developed or implemented four MTW activities that address this goal (listed under the housing choice statutory objective on the following table).

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The following table shows a list of activities that were included in our MTW Annual Plans.

ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Implemented
3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
4	Biennial Recertifications	Cost Effectiveness	FY 2009	Implemented
5	Simplified Income Determination	Cost Effectiveness	FY 2009	Implemented
6	Elimination of Assets	Cost Effectiveness	FY 2009	Closed Out
7	Controlled Program Moves	Cost Effectiveness	FY 2009	Closed Out
8	Local Policies for Portability	Economic Self-Sufficiency	FY 2009	Implemented
9	Elimination of Earned Income Disallowance	Economic Self-Sufficiency	FY 2009	Closed Out
10	Minimum Rent	Economic Self-Sufficiency	FY 2009	Implemented
11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented
15	Pilot Work Requirement	Economic Self-Sufficiency	FY 2010	Closed Out
16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
17	Local Income Inclusion	Economic Self-Sufficiency	FY 2011	Closed Out
18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
19	Local FSS program	Economic Self-Sufficiency	FY 2011	Implemented
20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented

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ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017	Implemented
27	Local Project-Based Voucher Subsidy for Tax Credit Developments	Expanding Housing Opportunities	FY 2019	Implemented
28	Moving On	Expanding Housing Opportunities	FY 2021	Pending Approval

Accomplishments

HACSB has made progress toward our long-term strategic goals in the following ways:

- Goal 1 Operational efficiency through innovation Maximizing HACSB's economic viability and sustainability:
 - In FY 2019, the HACSB implemented an online applicant portal and resident portal to submit work orders for residents at the various affordable housing sites.
 - Worked on reopening the Tenant-Based Voucher program waiting list online via the applicant portal.
 - Worked on various agency videos such as the No Child Left Unsheltered program informational video and tutorial videos for online portals.
 - In FY 2019, HACSB implemented the utilization of an electronic bidding software. The online vendor management and bidding tool was implemented to allow for greater organization, efficiency, and tracking and to reduce to the amount of paper used.
 - HACSB implemented the utilization of the project management platform, Smartsheet for project tracking in development, finance, construction and maintenance.
 - In FY 2019, HACSB completed the integration of Vendor Café within the Yardi P2P software. Vendor Café allows vendors to register in our system for payment, upload insurance, W-2's, along with other efficiency functions.
 - Completed the reorganization of the Housing Services Department from a process-based structure to a full cycle case management structure.

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- **Goal 2 Develop economically independent clients** Facilitating opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy:
 - The Housing Authority received a \$208,139 renewal grant for its Family Self-Sufficiency Program, which helps fund three staff
 coordinators to administer the program. Families in this program access tools to achieve their education and employment
 goals.
 - Continued research partnership with Loma Linda University whose research provides great insight on how our MTW innovative initiatives are benefiting families and using their recommendations to improve our service delivery models and programs overall.
 - In the fall of 2018, HACSB received a \$484,830 state award from the California Advanced Services Fund Broadband Public Housing Account Adoption Grant to provide digital literacy courses at its various affordable housing communities.
 - In partnership with Great Harvest Community Center Inc., HACSB opened three Digital Learning Centers at our Colton, Redlands, and Maplewood affordable housing sites. The Digital Learning Centers offer basic computer literacy workshops to the residents. As of August 2019 there were 147 residents that had graduated from the digital literacy training program. Furthermore 115 residents have received free laptops and 81 have signed up for low cost broadband services.
 - The Housing Authority, in partnership with KidCare International, opened a food bank at the Los Olivos Affordable Housing Community in Upland. The food bank is a resource for the entire community. All community members are welcome each Saturday morning to volunteer and/or receive donated food items from Vons, Target, Auntie Anne's, Chipotle Mexican Grill, Kentucky Fried Chicken, Pizza Hut, and Saca's Mediterranean Cuisine. For over 20 years, the Housing Authority has partnered with the county's Preschool Services Department to provide Head Start facilities at its various affordable housing sites. Two Head Start sites have had to be demolished as part of revitalization efforts; however, both have been reinstated. In the summer of 2018, the Housing Authority relocated the Waterman Gardens Head Start facility to a newly rehabilitated site as part of the larger revitalization efforts at Arrowhead Grove. Two duplexes, just a few hundred yards from the previous location, have been renovated to meet the professional and educational needs of both the preschool staff and the families they serve. In 2019, HACSB hired two Resident Service Coordinators to deliver a higher level of resident services with multiple resident engagement events scheduled.
 - HACSB implemented an online work order module for the self-managed portfolio. Residents have the option of placing work orders online rather than calling the office.

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- **Goal 3 Ensure freedom of housing choice** Providing quality affordable housing opportunities in mixed-income communities with access to excellent quality of life:
 - On Sept. 30, 2019, the financing closed for the second onsite phase of the former Waterman Gardens public housing community (now referred to as the Arrowhead Grove neighborhood). This second-phase community Crestview Terrace will result in a total of 184 mixed-income family apartments and complete the HUD-required one-for-one replacement of the original 252 public housing units. The new construction will provide 147 affordable one- to four-bedroom family units with an additional 35 market-rate units interspersed across the site and two units for property managers. One hundred thirty-six new affordable housing units have already been built in previous construction phases.
 - In the fall of 2019, the grand opening was held for Loma Linda Veterans Village an 87-unit affordable apartment community serving homeless veterans and low-income veteran families in Loma Linda, California. This affordable housing development for veterans utilizes 50 Veterans Affairs Supportive Housing rental assistance vouchers that were awarded from HUD through a competitive allocation (2015 application) along with 37 rental assistance vouchers through HUD's Housing Choice Voucher program.
 - In 2019, the rehab construction for Golden Apartments in the city of San Bernardino was complete and families started moving in. Golden is one of HACSB's first permanent supportive housing sites with 38 newly converted one-bedroom units.
 - Rehab construction continues for Desert Haven Apartments in the city of Victorville, which is HACSB's second permanent supportive housing site. Once it opens in the late summer of 2020, it will include 24 one-bedroom units.
 - Throughout 2019, part of ongoing RAD efforts, HACSB continued working on several million dollars' worth of renovations to the former public housing communities, with a goal of completing the bulk of this work countywide by the end of 2020.
 - HACSB has made formal commitments to assist both the Related Companies and AMCAL Multi-Housing Inc. with project-based vouchers to support the construction of 55 affordable family units in Rialto and 112 affordable family units in Colton, respectively. Both developers expect to apply for low-income housing tax credits in early 2020.
 - HACSB and affiliate nonprofit Housing Partners I continue to work with ONYX Architects to complete construction documents by early 2020 to implement the 104-unit second phase of affordable family units at Valencia Grove in Redlands. Funding permitting, this project is expected to be under construction in the summer of 2020.

We are confident that through our long-term strategic planning and collaboration with community partners, we will reach our mission of empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout the County of San Bernardino.

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Section II: General Operating Information

This section provides an overview of the Housing Authority of the County of San Bernardino's (HACSB) housing portfolio, leasing, and waiting list information.

Agency Overview

HACSB provides affordable housing assistance to more than 10,000 families throughout the County of San Bernardino through the Public Housing program, the Housing Choice Voucher Programs, and special programs such as the Continuum of Care (formerly known as Shelter Plus Care), Veterans Administration Supportive Housing (VASH) vouchers, Mainstream, and our authority-owned portfolio. We provide families a stepping stone through difficult economic times and, in conjunction with community partners, assist them on their path to economic independence.

In September 2016, the Housing Authority of the City of Upland (UHA) and HACSB applied to the U.S. Department of Housing and Urban Development (HUD) for the voluntary transfer of UHA's Housing Choice Voucher (AKA "Section 8") and Public Housing programs to HACSB effective July 1, 2017. The application was approved by HUD for the Housing Choice Voucher program on June 16, 2017, and for the Public Housing program on June 29, 2017. The process resulted in the transfer of 98 Public Housing units and 624 Housing Choice Vouchers from UHA to HACSB on July 1, 2017. Thereafter, HACSB assumed responsibility for both programs and began providing all services to the families served through those programs. Information about the transferred units and families and how HACSB's moving to Work initiatives apply to those units and families is included in this Plan. HACSB intends to convert the Public Housing site, Los Olivos, to project-based voucher assistance through the Rental Assistance Demonstration (RAD) program. However, no other changes are made relative to the Public Housing and Housing Choice Voucher units and families through this 2021 Annual MTW Plan.

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A. Housing Stock Information

The majority of funding HACSB receives from HUD is the Public Housing operating fund, Public Housing capital fund, and MTW Housing Choice Voucher funding. As a MTW agency, HACSB has authorization to combine these three sources into using MTW single-fund flexibility. These funds are used to support the units described in the following tables.

i. Planned New Public Housing Units

HACSB does not anticipate adding new Public Housing units in fiscal year 2019-2020.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	Bedro	ом Ѕі	ZE			TOTAL UNITS	POPULATION TYPE	# OF UNIFORM FE STANDARDS (UFA	DERAL ACCESSIBILITY S) UNITS
	0/1	2	3	4	5			FULLY ACCESSIBLE	ADAPTABLE
N/A	-	-	-	-	-	0	N/A	0	0
TOTAL PUBLIC HOUSING UNITS TO BE ADDED IN THE PLAN YEAR						0		0	0

ii. Planned Public Housing Units to be Removed

HACSB has received approval under HUD's Rental Assistance Demonstration (RAD) program to convert our entire Public Housing portfolio. As of FY 2020, all units scheduled for RAD conversion have been or will be converted to Project Based Voucher units. The Los Olivos Public Housing site in Upland will not be converted through RAD. Instead, assistance to residents of the site will be converted through the Streamlined Voluntary Conversion process.

AMP Name and Number	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Los Olivos	98	Streamlined Voluntary Conversion (SVC) is expected to take place in mid-2020.
	98	TOTAL PUBLIC HOUSING UNITS TO BE REMOVED IN THE PLAN YEAR

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iii. Planned New Project-Based Vouchers

In FY 2021, HACSB does not anticipate awarding new project-based vouchers.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Arrowhead Grove, Phase III	46	No	Original Public Housing Development, New Construction
Los Olivos, Upland	98	No	SVC Conversion, Existing Public Housing Community
144		PLANNED '	TOTAL VOUCHERS TO BE NEWLY PROJECT-BASED

iv. Planned Existing Project-Based Vouchers

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Barstow (AMP 7)	217	Committed	Yes	RAD Conversion, Existing Public Housing Community
Colton/Chino (AMP 6)	174	Committed	Yes	RAD Conversion, Existing Public Housing Community
Maplewood Homes	296	Committed	Yes	RAD Conversion, Existing Public Housing Community
Redlands/Highland (AMP 5)	87	Committed	Yes	RAD Conversion, Existing Public Housing Community
Scattered Sites (AMP 2)	97	Committed	Yes	RAD Conversion, Existing Public Housing Community
Scattered Sites (AMP 3)	34	Committed	Yes	RAD Conversion, Existing Public Housing Community
Waterman Gardens Phase III – Crestview Terrace	116	Committed	Yes	Family Community, Existing Development
Waterman Phase 1 – Valencia Vista Val-9	75	Leased/Issued	Yes	Family Community, New Development (44 RAD units, 31 non-RAD units)

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PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Waterman Gardens Phase 2 – Olive Meadow	61	Leased/Issued	Yes	Family Community, New Development
Andalusia	17	Leased/Issued	No	Family Community, Existing Development
Arrowhead Woods	51	Leased/Issued	No	Senior Community, Existing Development
Bloomington (Related Phase 1)	11	Leased/Issued	No	Family & Senior Community, New Development
Bloomington (Related Phase 2)	20	Leased/Issued	No	Family Community, New Development
Bloomington (Related Phase 3)	20	Leased/Issued	No	Family Community, New Development
Day Creek Villas, Rancho Cucamonga	8	Committed	No	Senior Community, New Development
Desert Haven (Queens Motel), San Bernardino	31	Leased/Issued	No	Permanent Supportive Housing for Chronically Homeless
Desert Village	46	Leased/Issued	No	Senior Community, Existing Development
Golden Apartments, Victorville	38	Leased/Issued	No	Permanent Supportive Housing for Chronically Homeless
Grandview Towers	40	Leased/Issued	No	Senior Community, Existing Development
Horizons at Yucaipa	50	Leased/Issued	No	Senior Community, New Development
Horizons at Yucaipa, Phase II	27	Leased/Issued	No	Senior Community, New Development
Ivy at College Park, Chino	8	Leased/Issued	No	Family Community, New Development
Las Terrazas Apartments, Colton	9	Leased/Issued	No	Family Community, New Development
Meadowbrook	47	Leased/Issued	No	Senior Community, Existing Development
Mentone Clusters	34	Leased/Issued	No	Family Community, Existing Development

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
NCLU- Scattered Sites	26	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites	10	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites	4	Leased/Issued	No	Project-Based Voucher Program
Redwood Terrace	68	Leased/Issued	No	Senior Community, Existing Development
Rialto Metrolink, Rialto	8	Committed	No	Family Community, New Development
Robert O Townsend	48	Leased/Issued	No	Senior Community, Existing Development
Rosina Fountains (AKA Fontana Family Development Project), Fontana	8	Leased/Issued	No	Family Community, New Development
Scattered Site Units	229	Leased/Issued	No	Family Community, Existing Development (HPI)
Scattered Site Units	79	Leased/Issued	No	Family Community, Existing Development (HPI)
Sunrise Vista	108	Leased/Issued	No	Family Community, Existing Development
Sunset Pointe	117	Leased/Issued	No	Family Community, Existing Development
Valencia Grove, Redlands (Phase 1)	85	Leased/Issued	No	Family Community, New Development
Veterans Housing, Loma Linda	36	Leased/Issued	No	Veterans' Housing, New Development
Valencia Grove, Redlands (Phase 2)	104	Committed	No	Family Community, New Development
Veterans' Housing, Various Sites	40	Leased/Issued	No	Veterans' Housing, Scattered Sites
Vista del Sol	53	Leased/Issued	No	Senior Community, Existing Development
Yucaipa Crest	45	Leased/Issued	No	Senior Community, Existing Development
Yucaipa Terrace	51	Leased/Issued	No	Senior Community, Existing Development
	2,733	PLANNED TOTAL E	XISTING P	ROJECT-BASED VOUCHERS

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

HACSB does not anticipate any other changes to the Housing Stock during the Fiscal Year.

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

2020 marked the conclusion of our original portfolio RAD conversion strategy (and subsequent physical rehabilitation) for the entirety of HACSB's Affordable (public) Housing portfolio. We received approval from HUD in December 2014 to convert our entire Public Housing portfolio under the RAD program, wherein existing Public Housing subsidies are converted to rental assistance (vouchers). The initial phase closed at the end of April 2016, converting 552 units in 4 different AMPS. Capital fund was utilized to complete work identified under the RAD Physical Needs Assessments, and was 100% complete as of January 2018.

The second phase of the RAD portfolio transaction included conversion of 354 remaining units in 3 different AMPS. The RAD Conversion transaction for the second phase closed in September 2018, whereupon rehab work identified under the RAD Physical Needs Assessments commenced with a targeted completion by the end of 2019. Additionally, staff re-analyzed the physical renovations planned for Barstow public housing (AMP 170) and is implementing changes to the project to achieve a higher level of physical rehabilitation along with other measures to ensure long-term viability of the site(s). For example, the 7th Street site will now be converted via a transfer of assistance to a newer apartment complex in Barstow owned by the Housing Authority while the former public housing units will become available for homeownership. The physical rehabilitation work funded with Capital Fund therefore extended into 2020 with completion expected by the end of the year.

Construction of the initial on-site phase (62 units) of the Waterman Gardens revitalization project (the second RAD conversion project) broke ground in May 2016 and was completed and occupied as of September, 2017. The new community, now called Arrowhead Grove, will eventually include over 400 mixed-income housing units as well as commercial/community facilities intended to provide employment and training opportunities supporting HACSB's MTW initiatives. Housing affordability remains the primary focus for the development as well as revitalization of the broader neighborhood, as evidenced by the initial RAD application which supported the development of the 75-unit Valencia Vista (aka Val9) Apartments on an adjacent site (completed and occupied in 2016). HACSB and its developer partner have planned a mix of RAD and project-based voucher units with substantial funding secured through Low Income Housing Tax Credits. The existing 252 ACC units are being replaced on a one-for-one basis (transitioned to RAD project-based vouchers) over the course of the multiple-phase redevelopment. The second on-site phase (184 units) received allocations of low income housing tax credits and tax exempt bonds along with a \$20 million dollar infusion of state of California Affordable Housing and Sustainable Communities (AHSC) program funds by the end of 2018. The very complex financial transaction enabling construction to commence closed on September 30, 2019. It included the RAD closing, HACSB's issuance of \$55 million in tax exempt bonds, a tax

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credit closing funding nearly \$15 million in equity, and approximately \$10 million in state and local funding to bring construction sources to approximately \$80 million. This funding enabled construction to start in October-2019 for the final phase of the RAD conversion project at Waterman Gardens. Construction is expected to be completed in the Fall of 2021.

In 2020 we also continued pre-development work (finalizing preparation of construction documents), for the second phase of construction at the Redlands-Lugonia site (AMP 150, sites 01, 8, & 9), with an eye on commencing construction by the end of the year.

FY 2021:

The Capital Fund Program 5-Year Plan and Budget is included as Appendix E. Capital Fund available for physical improvements at Public Housing sites has been substantially reduced due to the conversion of subsidy for the entirety of HACSB's original public housing portfolio to vouchers under the RAD program. The majority of HACSB's original Public Housing units converted under RAD at the end of September, 2018. The last site remaining for conversion after that was the 98-unit Los Olivos site which was acquired by HACSB through the transfer of the Upland Housing Authority's public housing and voucher programs. This site was anticipated to close under RAD in August, 2019. However, staff has now opted to transition the site through Section 22 Streamlined Voluntary Conversion pursuant to HUD PIH Notice 2019-05. We expect that conversion process to be completed during 2021. Utilizing Capital Fund, in 2020 HACSB continued to complete capital improvements identified under the site's physical needs assessments to ensure that the units will continue to meet the needs of residents of Upland over the long term. Such work will include interior kitchen and bathroom renovations, Section 504 unit accessibility, exterior xeriscaping, and miscellaneous dwelling interior and exterior improvements. HACSB will also continue to implement additional energy improvements agency-wide to augment work completed previously under an Energy Performance contract.

HACSB's major Public Housing redevelopment efforts will continue in Redlands (AMP 150, sites 19-01, 8 & 9) where the second phase of new construction will add 104 units of affordable family rental housing to the site to compliment the 85 units completed in 2016. We are utilizing accumulated (first 5-year increment) Replacement Housing Factor (RHF) funds in excess of \$3 million to support construction. Likewise, the third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) commenced construction in the Fall of 2019, adding approximately 182 affordable family rental units plus 2 manager's units to complete the one-for-one replacement of Public Housing units formerly located there while also adding market rate units to create a mixed-income community. We are utilizing Demolition/Disposition Transition Fund (DDTF) leveraged with state and local funding and Low Income Housing Tax Credits (LIHTC) to support this effort, which is expected to be completed by Fall of 2021.

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HACSB will strive to implement new resident employment programs under Section 3 to support the variety of Moving-To-Work initiatives described in this plan. Where possible, Capital Funds will be utilized (and leveraged with outside funding) for employment training anchored within the large Public Housing revitalization projects already underway (Redlands-Lugonia and Waterman Gardens). These programs will prioritize training centered around sustainable development and green building practices, property management and maintenance of the newly constructed rental housing, as well as pre-apprenticeship construction training. These efforts are intended to also extend into the neighborhoods surrounding the existing site to promote community-wide revitalization.

B. Leasing Information

i. Planned Number of Households Served

In FY 2019, HACSB anticipates continued strong rates of leasing for both Public Housing and vouchers. The remaining Public Housing units will be converted to project-based voucher units through HACSB's RAD conversion process, and this change is reflected in the number of Public Housing units anticipated to be leased during the fiscal year.

The following table presents projected voucher utilization for MTW vouchers and Public Housing occupancy for the Public Housing units at the end of FY 2021. HAP expenses have risen over the previous several years and are expected to increase further in FYE 2021. At the time of this writing, per-unit costs (PUC) exceeds per-unit funding (PUF) and a HAP shortfall is projected. To offset this shortfall, HACSB intends to lease to only 95% of its MTW voucher baseline in FYE 2021.

The MTW Public Housing units anticipated to be leased include 98 units at the Los Olivos development which are expected to be converted out of Public Housing through Streamlined Voluntary Conversion (SVC) in FY 2021. The exact timeframe of conversion is unknown, and HACSB is reporting that these units will comprise 588 unit months, or six months of leasing. In addition, one single-family home in AMP 180 comprises 12 unit months. A total of 99 families are expected to be served through Public Housing during FY 2021; however, in accordance with instructions for HUD Form 50900, the number of families anticipated to be served reported in this Plan is calculated as the total unit months for the year (600) divided by twelve months. This Plan indicates that 50 families are anticipated to be served through Public Housing during the year.

HACSB does not have any local non-traditional MTW funded programs.

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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	600	50
MTW Housing Choice Vouchers (HCV) Leased	112,039	9,337
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	112,639	9,387

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	N/A	N/A	N/A
Homeownership	N/A	N/A	N/A

ii. Description of any Anticipated Issues/Possible Solutions Related to Leasing

Housing Program	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS	
MTW Public Housing	None.	
MTW Housing Choice Voucher	Voucher holders continue to experience difficulty locating units due to current rental market conditions. Search times of 120 days are not uncommon. HACSB is providing families with the maximum possible search times and beginning the wait list selection process earlier than is typical in anticipation of the longer search times.	
Local, Non-Traditional	None.	

C. Waiting List Information

i. Waiting List Information Anticipated

HACSB's wait list strategies vary to match the needs of different communities and housing programs. Applicants may be, and often are, on multiple wait lists at the same time. This duplication is described in the following tables.

HACSB anticipates that community need for affordable housing will remain high in FY 2021. The following table shows the projected number of households on wait lists for Public Housing units and vouchers as of the beginning of FY 2021. HACSB does not currently envision organizational or policy changes to wait lists.

As part of the voluntary transfer of the Public Housing and Housing Choice Voucher programs from the Upland Housing Authority (UHA) to HACSB effective July 1, 2017, the applicants that were on the UHA wait lists have been transferred to HACSB's wait lists. The wait list totals shown in the following tables include these applicants.

Housing Choice Vouchers

HACSB maintains a single tenant-based voucher wait list. The list was most recently opened for 19 days in February 2019; 21,862 applications were received. The opening was conducted through our online wait list portal, and a call center was available to assist customers with their questions and to respond to requests for reasonable accommodations. We do not anticipate re-opening the tenant-based voucher wait list in FY 2021.

Separate site-specific wait lists are maintained for each project-based voucher property.

Public Housing and Rental Assistance Demonstration Units

Site-specific waiting lists are offered by bedroom size for all of HACSB's Public Housing/RAD communities. All wait lists under this program are maintained centrally to maximize efficiencies and housing choice.

HACSB's application for conversion of its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program was approved in December 2014, and the process of converting all sites is expected to be complete in calendar year 2020. As a result, HACSB has moved all applications currently on the wait lists for the converted Public Housing sites to new site-based RAD PBV wait lists. The remaining applications will be moved to similar lists upon conversion of the remaining sites. The applications will retain their original date and time of application and will be subject to the preferences that apply to the PBV wait list. Applicants will be notified of the change and will be offered the opportunity to opt out of placement on the HACSB PBV wait lists.

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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?
Public Housing	Centrally managed, site-specific, by bedroom size	1,700	Partially open	Yes, by bedroom size as needed
Rental Assistance Demonstration Sites - PBV	Centrally managed, site-specific, by bedroom size	18,000	Partially open	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	35,000	Partially open	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	18,000	Closed	No

DESCRIPTION OF DUPLICATION OF APPLICANTS ACROSS WAITING LISTS

28% of applications are duplicates, representing families who have applied to two or more waiting lists. There are 47,573 unduplicated families on HACSB's waiting lists.

ii. Planned Changes to Waiting Lists in the Plan Year

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
N/A	None anticipated for FY 2021
N/A	None anticipated for FY 2021

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Section III: Proposed MTW Activities

HACSB is not proposing or re-proposing any MTW activities through this Annual MTW Plan.

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IV: Approved MTW Activities

This section provides HUD-required information detailing previously approved uses of MTW authority for implemented (active), not yet implemented, on-hold, and closed-out activities. An overview of each active MTW activity is included with an update on any non-significant modifications planned for FY 2021.

A. Implemented Activities

Activity 1: Single Fund Budget

The flexibility granted under this activity is included in the statutory authorizations granted to MTW agencies. In accordance with HUD guidance, information related to this activity is included in Section V: Administrative.

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Activity 4: Biennial and Triennial Recertifications

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval as a pilot program for elderly and disabled households in the Public Housing and Housing Choice Voucher programs with no other adult members and no earned income.
- FY 2012: Modified to expand the scope of the activity to apply to all families in both programs was approved. The expanded initiative was implemented in 2012 with approximately half the households assigned to a biennial schedule. The remaining households were assigned to the biennial schedule in 2013.
- FY 2014: The first complete cycle of biennial certifications was completed in 2014.
- FY 2019: Modified to add triennial recertifications for elderly-only fixed-income families. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was indicated in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Current regulations require annual income recertifications for most participants of the Public Housing and Housing Choice Voucher programs. This MTW activity allows HACSB to conduct recertifications of MTW and VASH households biennially or triennially. Elderly-only fixed-income families are recertified triennially; all other families are recertified biennially. Triennial recertifications for elderly-only fixed-income families began in September of 2019, with triennial recertifications for VASH families beginning in May 2020.

Biennial/Triennial Recertification Process

- HACSB will perform a full recertification to examine family income and composition once every three years for elderly-only fixed-income families, and once every two years for all other families. No PHA-initiated updates will take place during the years between full recertifications.
 - An elderly-only fixed-income family is defined as having no members under the age of 57 AND having at least 90 percent of its income from fixed sources.
- This activity modifies the recertification schedule only. Families will continue to be subject to the interim reporting requirements, calculation of income and rent, and other components of their assigned program type (Term-Limited Lease Assistance, Streamlined Lease Assistance, etc.)

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Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

HACSB will extend the validity of a family's most recently completed biennial or triennial recertification by one year. The due
date of the family's next biennial or triennial recertification will be one year from the original due date, and future
recertifications will follow the biennial/triennial schedule (taking place two/three years from the date of the extended
recertification).

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS# 4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

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Standard metrics CE #5, SS #1, SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual MTW Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. As a result, HACSB does not anticipate that these metrics will reflect an increase in tenant rent share, household income, positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

v. Planned Significant Changes

None.

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Activity 5: Simplified Income Determination

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial approval as "Local Verification Policies". Implemented on October 1, 2009.
- FY 2019: Modified to rename this activity and merge the functions of the following activities:
 - Activity 5 Local Verification Policies (the original name of this activity)
 - Activity 6 Elimination of Assets (originally approved in our FY 2009 Annual MTW Plan and implemented on October 1, 2009). This component was closed out as a separate activity in FY 2019.
 - Activity 9 Elimination of Earned Income Disallowance (originally approved in our FY 2009 Initial Annual MTW Plan and effective on October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs). This component was closed out as a separate activity in FY 2019.
 - Activity 17 Local Income Inclusions (originally approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. The activity was modified through HACSB's FY 2015 Annual MTW Plan). This component was closed out as a separate activity in FY 2019.
- Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. All aspects of this activity except the elimination of the Earned Income Disallowance apply to VASH households.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity includes four components: local verification policies, elimination of assets, elimination of the Earned Income Disallowance, and local policies for income inclusions and exclusions. The activity applies to MTW and VASH households; however, the elimination of the Earned Income Disallowance component does not apply to VASH households.

Verification Policies

The verification standard used by HACSB was modified in FY 2011 to establish the following local verification hierarchy:

- 1. Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) is the highest standard of verification.
- 2. Documents provided by the household and observed to be satisfactory to verify income are the second tier of verification.
- 3. Third-party written verification is requested as the third tier of verification if additional verification is necessary.
- 4. Third-party oral verification is permitted as the lowest ranking type of income verification.

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Applicant verifications may not be more than 120 days old (from the date received) at the time of orientation. For participants, verifications remain valid for six months (180 days) from the date received.

Elimination of Assets

Assets are fully excluded from the calculation of annual income for the purpose of determining the tenant rent portion. Asset information is verified at initial eligibility for the purpose of determining income eligibility for assistance. Thereafter, information related to assets is not collected and income from assets is not considered as part of the income/rent calculation formula.

Elimination of Earned Income Disallowance

HACSB has eliminated the HUD Mandatory Earned Income Disallowance (EID) from the calculation of total tenant payment. This component does not apply to VASH program participants.

Local Income Inclusions and Exclusions

HACSB has established local policies to include or exclude certain income sources that are currently excluded or included under regulation. The modifications to the rent calculation are:

- Foster care income is fully included;
- Sanctioned Temporary Assistance to Needy Families (TANF) income, whether due to non-compliance with self-sufficiency requirements, fraud or any other sanction reasons authorized by CALWORKS, except term limits, is fully included;
- Adoption assistance payment income is fully included (effective at each family's first biennial recertification effective on or after October 1, 2015);
- The earned income of full-time students other than the Head of Household, spouse, and co-head of household is fully excluded (effective at each family's first biennial recertification effective on or after October 1, 2015).

This activity has simplified the process for our families and the housing staff, reducing staff time spent on verifications, calculation of assets, processing the Earned Income Disallowance, and related agency costs.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

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- CE #3: Decrease in Error Rate of Task Execution
- CE #5: Increase in Tenant Rent Share

v. Planned Significant Changes

None.

Activity 8: Local Policies for Portability

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The initial implementation of this activity began on October 1, 2009
- FY 2010: Modified to add a work requirement for portability. The work requirement was implemented on August 1, 2010.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures.

Through this activity, HACSB applies the requirements of its ongoing MTW activities to inbound portability participants.

This activity has resulted in significant staff time savings, achieving at least a 64% reduction in staff hours to process ports-in each year since implementation. All benchmarks for this activity have been fully or partially met since FY 2010.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

HACSB will temporarily suspend acceptance of Housing Choice Voucher Program ports-in from other housing authorities. If
HACSB receives an inquiry from a customer and/or initial PHA regarding portability during the time that this temporary
suspension is in place, HACSB will advise the customer and/or initial PHA that ports-in are not being accepted due to temporary
emergency operations.

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Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

• CE #1: Agency Cost Savings

• CE #2: Staff Time Savings

v. Planned Significant Changes

None.

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Activity 10: Minimum Rent

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The activity was implemented on October 1, 2009, for recertifications and on January 1, 2010, for all new families.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.

ii. Description/Update

This activity addresses the MTW statutory objectives to reduce costs and achieve greater effectiveness in federal expenditures and to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

This activity allows HACSB to increase the minimum rent to \$125 from the current regulatory maximum of \$50 per month for all households in both the Public Housing and Housing Choice Voucher Programs. The activity applies to MTW and VASH households.

Non-elderly and non-disabled families paying the minimum rent will be required to participate in services offered through HACSB's Career Development Initiatives (CDI) team. The Head of Household will be required to sign an individual training and services plan (ITSP) with the primary objective of increasing the family's earned income. This component was approved in HACSB's FY 2019 Annual MTW Plan, and we are working to make the necessary policy and procedure changes. However, implementation of this requirement has been delayed due to staffing and structural changes within the Career Development Initiatives team.

There have been no requests for hardship exemption from the minimum rent.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status

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- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. HACSB does not anticipate that these metrics will reflect an increase in positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

v. Planned Significant Changes

None.

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Activity 11: Local Project-Based Voucher Program

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2010: Clarified components of the activity through FY 2010 Annual MTW Plan, Amendment 3. Implemented September 2010.
- FY 2015: Modification proposed through our FY 2015 Plan, Amendment 1B, but not approved by HUD. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 MTW Plan.
- FY 2018: Modification to expand unit types eligible for project-based vouchers and add a work and/or supportive services requirement.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. A modification to allow HACSB to apply alternative occupancy standards in special circumstances was included in our FY 2019 Annual MTW Plan, Amendment 1.

ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

HACSB has implemented a local Project-Based Voucher (PBV) program to increase the availability of quality housing units. The expansion of our housing authority and/or our affiliate nonprofit owned housing stock will allow us to continue to reinvest net income into the acquisition of additional affordable housing units. The flexibilities included under this activity are:

- Up to 100% percent of units in any development may be project-based;
- Up to 30% of HACSB's MTW baseline number of units may be allocated for PBV (including RAD-PBV units);
- PBV will be allocated to all of the Public Housing units approved for disposition other than 27 Shelter Plus Care units to be rehabilitated in conjunction with the County Department of Behavioral Health (308 PBV units);
- Households residing in PBV units will not have automatic priority to receive tenant-based vouchers after one year, but instead will have such a priority after two years (this component does not apply to RAD PBV households);
- A local PBV HAP contract which modifies the terms and conditions of the HAP contract, including the ability to execute PBV HAP contracts for groupings of non-contiguous scattered-site properties and to contract for a total number of units by bedroom size within a development rather than for specific units;

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- HACSB will project-base assistance at properties owned by HACSB or HACSB affiliate that are not Public Housing without a competitive process;
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest, and that are owned by non-profit and/or for-profit housing entities. Such units must meet existing Housing Quality Standards (HQS) or HACSB-local HQS.
- Alternate standards for determining the location of existing newly constructed or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement;
- An over-housed household residing in a Public Housing unit that is disposed of and converted to a Project-Based Voucher may remain in its unit and HACSB will subsidize the household based on the size of the unit, not the qualifying voucher size;
- HACSB may require an under-housed household residing in a Public Housing unit that is disposed of and converted to a Project-Based Voucher to move with a voucher for the number of bedrooms for which the household qualifies;
- For a unit other than former Public Housing units, HACSB may designate the unit as a PBV unit and allow an in-place household for which the unit is wrong-sized to remain in occupancy for up to one year, if the owner agrees to accept a PBV contract rent that does not exceed the HACSB subsidy standard for the household for the initial term of the lease.
- Initial contract rent for units owned by HACSB as defined in the PBV regulations may be determined using an HACSB market study that will consider local rental submarkets, in lieu of the requirement to use an independent entity with rents based on an appraisal by a state-certified appraiser. This flexibility is applied to the first two phases of the Waterman Gardens public housing revitalization project, where single-fund flexibility is utilized to increase RAD contract rents to match local market rent levels, thereby allowing us to generate more private debt and equity necessary for new construction. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three.)
- The rents for Rental Assistance Demonstration (RAD) units will equal the maximum specified under the RAD Notice. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three.)
- HACSB may project-base vouchers for unit types which are not allowable under traditional regulatory PBV. The types of housing which may be assisted through PBV include the following:
 - Shared housing (up to one person per bedroom);
 - O Units on the grounds of a penal, reformatory, medical, mental health, or similar public or private institution;
 - Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care;

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- Manufactured homes;
- Transitional housing;
- Single-room occupancy;
- Congregate housing;
- Other housing types as needed.
- Where appropriate, HACSB will partner with universities, state and local government, and other stakeholders to develop housing and service delivery programs which leverage HACSB and partner resources. Where appropriate and feasible, programs will include both housing and related health care, education, job preparedness, and/or other necessary supportive services for individuals assisted through the programs.
 - To ensure that assisted families receiving on-site supportive services through an HACSB partner continue to reside at the location where the services are provided, HACSB may not provide a tenant-based voucher upon completion of the initial two-year term of assistance. Assisted families will be notified at move-in whether or not they will be eligible to receive a tenant-based voucher.

Rent Reasonableness, HAP, and Vacancy Payments (Shared Housing Units)

HACSB will use its Local Payment Standard (LPS) to determine rent reasonableness and maximum HAP. If a shared housing unit is not fully occupied, HACSB will pay the full HAP for the unit for up to sixty days. After sixty days, the HAP will be prorated to reflect the percentage of occupied bedrooms

Additional Requirements

Our approved FY 2018 Annual MTW Plan included the addition of a requirement for the PBV project developer/manager to administer a work requirement and/or supportive services program for some project-based voucher (PBV) contract awards. This component has not yet been implemented.

The requirement will apply only if the number of PBV units exceeds a reasonable number or percentage of the total units in the development. The requirement will <u>not</u> apply to developments where conflicting regulation or law exists. HACSB intends to apply this proposed modification only to new PBV awards. A work requirement and/or supportive services requirement would not be applied to existing PBV contracts unless agreed upon by the owner.

When a PBV award includes a work requirement, the work requirement will apply only to non-elderly and non-disabled families residing in PBV units. Adult family members will be required to participate in work-related activities for a minimum of fifteen hours per week. Work-related activities shall include activities removing barriers to gainful employment, activities leading to gainful employment, and employment. HACSB will require the developer/manager to provide supportive services to these families.

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Supportive services may include, but are not limited to, job skills/employment coaching and job search services, life skills classes, and other services designed to help families meet the work requirement.

For some PBV awards, HACSB may include a supportive services requirement only. Supportive services may include, but are not limited to, educational and employment services, life skills classes, assistance accessing community resources, and other services.

At the commencement of this activity in FY2018, HACSB had 1,441 PBV units. HACSB has increased its total PBV units to 2,770 available units, including RAD PBV units.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- HC #4: Displacement Prevention
- Local Metric: Units of Project-Based Voucher Assistance Added to the HACSB Portfolio

v. Planned Significant Changes

None.

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Activity 12: Local Payment Standards and Alternative Flat Rents

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2011: Implemented on July 1, 2011 for all new lease ups and recertifications
- FY 2012: Modified to use the maximum subsidy as determined through HACSB's annual market rent study as the guideline in determining the contract rent for voucher units.
- FY 2015: Modification proposed but not approved via Amendment 1B to our FY 2015 Plan. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 Annual MTW Plan.
- FY 2017: Modified to apply Local Payment Standards as the maximum flat rent for Public Housing units.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was
 received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our
 FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

This MTW activity allows HACSB to conduct a market assessment to identify submarket areas and develop Local Payment Standards for those submarket areas in lieu of the HUD-prescribed Fair Market Rents. The Local Payment Standards accurately reflect the diverse rental submarkets that exist across the vast San Bernardino County.

Our FY 2017 Annual MTW Plan expanded the use of Local Payment Standards to replace the HUD-published Fair Market Rents as the indicator for establishing flat rents in the HACSB public housing portfolio. The annually established Local Payment Standards by submarket and bedroom size are used to determine the maximum flat rent that can be charged to public housing residents. The actual flat rent may fall below the Local Payment Standard based on a comparison of like units in the same area consistent with standard industry rent comparable practices. If an annual review of the Local Payment Standards indicates an increase or decrease of more than 10% from the current rate, the public housing flat rent will be re-assessed. The new flat rents will be applied in accordance with the rent increase process as detailed in our Admissions and Continued Occupancy Policy and related Codes of Federal regulation that govern our public housing program.

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The activity applies to MTW and VASH households.

Since implementation, this activity has shown a significant improvement in the number of families able to move to areas of opportunity. We have nearly met or exceeded the benchmarks for our local metric, which measures the number of households residing in the two submarkets with the highest poverty and minority concentration. Overall, the number of households residing in these two submarkets has decreased by 9% since implementation. This change reflects an increase in the number of families that have relocated out of these submarkets into other areas of greater opportunity. HACSB anticipates that this trend will continue, and that the number of families relocating out of these submarkets will hold steady or increase slightly.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

HACSB may defer the annual review and update to the Local Payment Standards based upon the availability of a third-party
consultant to perform the market assessment. The annual review and update will take place as soon as it is safe, feasible, and
practical to do so.

Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

• CE #1: Agency Cost Savings

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- CE #2: Staff Time Savings
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #8: Households Transitioned to Self-Sufficiency
- HC #5: Increase in Resident Mobility
- Local Metric: Average HAP Cost
- Local Metric: Households Able to Move from Areas of Poverty and/or Minority Concentration

v. Planned Significant Changes

None.

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Activity 13: Local Inspection Policies

i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval. Implemented on May 1, 2011.
- FY 2015: Modified to expand biennial inspections to all MTW units
- FY 2016 and FY 2017: Expanded biennial inspections implemented across all MTW units.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity allowed HACSB to develop and implement local inspection standards for the Housing Choice Voucher (HCV) program that have increased operational efficiencies and ensured better housing options for low-income families. A modification to this activity was approved via our FY 2015 Annual MTW Plan. Biennial inspections are conducted for all units, and the property rating system currently used to determine the frequency of inspections for each unit was eliminated. Assisted units that were previously inspected annually were moved to a biennial inspection schedule, with 50% of those units inspected in FY 2016 and the remaining 50% inspected in FY 2017. No change was made to HACSB's enhanced local inspection standards.

In FY 2013, HACSB completely outsourced our HCV inspections. This change resulted in additional staff time and cost savings. We continue to perform quality checks of our portfolio for accuracy, inspection standards, and customer satisfaction. The percentage of inspections that have met our quality standards and qualified for biennial inspections has been well above the expected outcome. In FY 2017, HACSB met and exceeded our benchmark savings with a total savings of \$205,740. Additionally, the total staff time has decreased by over 90%, in spite of the additional time spent per inspection as a result of our local enhanced standards, largely due to the outsourcing of inspections. We anticipate that the cost and time savings will continue in future years.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by

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California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations changes for this activity:

- HACSB will extend the validity of a family's most recently completed biennial HQS inspection by one year. The due date of the family's next biennial HQS inspection will be one year from the original due date.
- HACSB will defer in-person initial HQS inspections. While this modification is in place, HACSB will accept self-certification by the family and property owner/manager that the unit meets all HQS requirements in order to allow the family to move in without delay. HACSB may require photographs to accompany the self-certification for some HQS components. As soon as it is safe, feasible, and practical to do so, HACSB will conduct an in-person HQS inspection to confirm that the unit meets HQS requirements. Deferred initial HQS inspections will be prioritized for processing as soon as HACSB is able to resume processing in-person inspections. In the event that the unit does not pass the in-person HQS inspection, HACSB will follow the same policies and procedures applicable to failed biennial inspections.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

Standard metrics CE #2 and CE #3 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost savings. As a result, HACSB does not anticipate that these metrics will reflect a decrease in error rates related to this task or an increase in staff time savings as a direct result of this activity.

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v. Planned Significant Changes

None.

Activity 14: Local Asset Management Program

i. Plan Year Approved, Implemented, Amended

• FY 2010: Initial approval.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

The First Amendment to the Standard MTW agreement executed on May 21, 2009 allowed HACSB to design and implement a local asset management program. As per our FY 2012 MTW Annual Plan and in accordance with the federal Office of Management and Budget (OMB) Circular A-87, we elected to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. Detailed information is provided in the appendices to this Plan.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None.

v. Planned Significant Changes

None.

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Activity 18: Property Management Innovation

i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity allowed HACSB to develop a property management innovation program that reflects private sector property management principles. The activity has the objective of implementing policies that are used in the private sector to decrease management costs, improve the quality of our units, and assist our tenants in becoming familiar with private sector property management principles. All residents signed a new lease which incorporated all the changes proposed in the activity. The lease reflected the following changes approved by HUD in our FY 2011 plan:

- a. 3-Day Notice to Pay or Quit (previous policy was 14 days).
- **b.** NSF fees of \$25.00 for first and \$35 for additional items (previous policy was \$25.00).
- c. Late fees increased from \$20 to \$50.
- **d.** Security deposits equal to one month's market rent (current security deposit charged is \$500.00)
- e. Implement a holding deposit of \$200.00
- f. Agency will choose lower of flat rent or 30% income rent for residents.
- **g.** Grievance Process Previous two step process was replaced with a single on site settlement conference with staff for timely and effective resolutions to issues.

The activity has resulted in cost savings and administrative efficiencies gained from the streamlined grievance process as well as the reduction in arbitration costs. As a result of HACSB's ongoing conversion of our entire Public Housing portfolio through the Rental Assistance Demonstration (RAD) program, the following components of this activity were eliminated in FY 2016 and FY 2017:

- a. 3-Day Notice to Pay or Quit
- g. Modified grievance process

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure

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continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

• HACSB will use remote meeting options whenever possible for actions within this activity which require a meeting between HACSB employees and assisted families, such as the modified grievance process (settlement conference).

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
 - a. Beginning with the FY 2020 Annual MTW Report, HACSB intends to update this metric. The benchmark for the component tracking the average per unit contract vacancy turnaround expenses will be revised from \$11 per unit month to \$45 per unit month. This change reflects the actual anticipated costs for vacancy turnaround of formerly Public Housing (now RAD-converted) units. HACSB has realized cost increases over the previous three years due to two primary reasons: vacancies and unit turnover has increased as families exercise their right to mobility using a tenant-based voucher, and maintenance work performed on RAD properties cannot be performed using HUD maintenance wages as Public Housing properties can, but are instead subject to more expensive California prevailing wage rates.
- CE #2: Staff Time Savings

v. Planned Significant Changes

None.

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Activity 19: Local FSS Program

i. Plan Year Approved, Implemented, Amended

• FY 2011: Initial approval. Implemented on July 1, 2012.

ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

HACSB has developed a pilot local FSS (Family Self-sufficiency) program to help families in their self-sufficiency efforts. Through our Local FSS program, program participants are eligible to receive the balance of their escrow savings account at the end of their FSS contract if they voluntarily terminate their assistance from the Housing Choice Voucher or Public Housing program due to self-sufficiency efforts. Families may also withdraw a portion of their FSS escrow savings balance during participation in the Local FSS program for certain self-sufficiency-related activities.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #2: Increase in Household Savings
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #2, SS #4, SS #5, SS #6, and SS #7 were added in HACSB's 2015 Annual Plan per HUD's request.

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v. Planned Significant Changes

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

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Activity 20: Term-Limited Lease Assistance – (formerly "Five-Year Lease Assistance Program" and "Term Limits")

i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012. Note: This activity was originally proposed as activity 21 under the title "Term Limits". It was renumbered as activity 20 with our FY 2012 Plan.
- FY 2015: Modified to include potential termination from the program for noncompliance with the household's Supportive Services Agreement.
- FY 2016: Modified to include an intake hardship exemption for extremely low-income and Triage Step 3 households and to expand the end-of-term hardship exemption. This modification was not implemented.
- FY 2017: Modified to include income-based subsidy calculation for new families joining the program, requirement for families to lease a unit with no more than one bedroom more or less than their voucher size, a post-assistance tracking survey process, approval to implement incentives for families to move to areas of opportunity, and expanded applicability to include careerable ports-in, project-based families exercising mobility, and non-legacy RAD families exercising mobility.
- FY 2018: Modified to include right-size unit restriction, limitation on the approvable amount of rent increases, and a limitation on the amount of subsidy paid on behalf of over-housed families.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

The goal of this activity is to enable the families we serve to focus on self-sufficiency efforts while we assist them with their housing needs for a limited term. This activity applies to new non-elderly and non-disabled households admitted to the Housing Choice Voucher program from HACSB's waiting list, porting in from another jurisdiction, or exercising mobility from HACSB project-based voucher sites¹. Families served through this activity are provided with up to five years of housing assistance and supportive services, with the possibility for extension through a hardship exception that may provide up to two years of additional assistance.

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¹ Excludes legacy families exercising mobility from an HACSB Rental Assistance Demonstration (RAD) Project-Based Voucher (PBV) site.

Currently assisted families who are selected from the wait list during their term of participation in the program may continue their current term of participation, but will not be provided a new or extended term of assistance. In such circumstances, the application will be removed from the wait list.

The activity is now in its ninth year. HACSB has partnered with Loma Linda University to conduct a longitudinal study to monitor the families served through this activity, tracking their goals and accomplishments. We have seen positive outcomes since implementation, including:

- Earned income for families in the program increases by an average 31.4% during their five-year term of assistance;
- Full-time employment increased by 20%;
- Unemployment decreased by 26.5%

As families progress through the program, we have learned more about the impacts of the activity. We will continue to work with our Loma Linda University partners to evaluate the families' progress and challenges as well as residual impacts the program has on families after they exit housing assistance.

Subsidy Calculation:

Families participating in the activity before November 1, 2017: the housing subsidy is set at 50% of the applicable payment standard for the unit selected by the family.

Families joining the activity on or after November 1, 2017: the subsidy calculation mirrors the Streamlined Fixed Assistance Program for New Non-Elderly/Non-Disabled Households. Under that calculation, the family's rent share is the greatest of 30% of their gross income, the minimum rent, or baseline rent, for the duration of assistance.

A subsidy limitation also applies to these families. To encourage families to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB will apply a subsidy limitation to over-housed families. Over-housed families are those who have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the applicable HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the family, which results in a greater family rent share than if the family had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount. Through this activity, HACSB will limit the maximum subsidy for over-housed families to the average subsidy rate for families that are not over-housed with the same size voucher.

Supportive Services:

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During the term of assistance, HACSB also provides supportive services to the family through its Career Development Initiatives (CDI) department. Families are required to meet with their CDI caseworker at least annually to review their action plan and progress. Services provided to families through the CDI team include:

- Needs assessment at intake to determine whether families have the resources needed to be successful in this program;
- Development of an individualized action plan for success;
- Onsite access to a Family Stabilization Specialist and Employment Services Specialist through HACSB's contract with the San Bernardino County Transitional Assistance (welfare) Department;
- Access to other resources designed to provide the family with meaningful support and tools to enhance the family's chances for success.

Mobility:

For families who initially leased under this activity prior to September 21, 2015, and who port to another jurisdiction during the term of assistance, the term limit will continue to apply unless the household is absorbed by the receiving agency. For families who initially lease under this program on or after September 21, 2015, the administration of the voucher will be in accordance with the receiving PHA's policies in accordance with the Federal Register notice published September 21, 2015.

Hardship Exemptions:

HACSB recognizes that the expiration of assistance may present a hardship for some families, and has developed hardship exemptions in four categories:

- 1. Completion of Self-Sufficiency Activity: to allow the family to complete an educational, job training, or other approved self-sufficiency activity.
- 2. Unforeseen and Involuntary Loss of Income
- 3. Near-Elderly Family: if the head of household will reach age 62 no later than six (6) months after the end of term or any applicable extension, the household may request a transfer to HACSB's Streamlined Lease Assistance for Elderly/Disabled Families.
- 4. Other Reasons: this category allows HACSB to approve an extension of assistance for rare or unusual circumstances, such as PHA error.

To be eligible for a hardship exemption, the family must have complied with all requirements of the program, including the Supportive Services Agreement. Any approved extension shall not exceed two years, and shall be approved in increments of six or twelve months as determined by HACSB. Total Term:

The total term of assistance under the program, including any approved hardship exemption, shall not exceed seven years.

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Unit Size Limitation:

Households assisted under the Term-Limited Assistance (TLA) Program must select a unit whose number of bedrooms is within one bedroom of the voucher size. For example, a family with a two-bedroom voucher may select a one-, two-, or three-bedroom unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed families are also more costly to house than families in right-sized units. As a result, HACSB requested and received approval through its 2018 Annual MTW Plan to require participant families to lease a unit that is the same size as their voucher. This modification has not been implemented as of the time of this writing, but HACSB may implement the change if other modifications do not result in families choosing to lease appropriately sized units.

Incentive to Move to Areas of High Opportunity:

HACSB may provide incentive to families in the term-limited lease assistance program to move to areas of high opportunity, as identified by HACSB.

Post-Assistance Tracking Incentive:

HACSB has partnered with Loma Linda University (LLU) to implement a survey system to collect information from Term-Limited Lease Assistance families at exit and annually for two years after assistance has concluded. Although participation in the survey is voluntary, a monetary incentive is provided for families completing the survey. Families receive the incentive payment only upon completion of each survey. As of early 2020, 480 families had participated in the exit study. 91.8% of families participating in the study reported a positive experience in the program and that participating in the program helped them and their family. Feedback obtained through the exit study helps HACSB to understand the family perspective and experience in the TLA program. Families also provide helpful suggestions for improving the program, including increasing family accountability and supports available to families.

Rent Increase Limitation:

Through its 2018 Annual MTW Plan HACSB was granted authorization to limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example, the average value of rent increases approved in FY 2016 was 10% of the previous contract rent. This modification would permit HACSB to cap the rent increase at a value less than 10% of the previous contract rent. This modification will provide HACSB with a mechanism to slow the HAP cost increases resulting from continued rent increases. However, HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity ("emergency operations") to ensure

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continuity of operations to the extent possible and practical. These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations changes for this activity:

- To the extent possible, HACSB will conduct annual meetings between TLA participants and their CDI caseworker by telephone
 or using virtual meeting technology. If this is not possible, HACSB will defer the annual meetings until it is safe, feasible, and
 practical to conduct them in accordance with normal procedures;
- The end of term (EOT) for any TLA participant with an EOT scheduled to occur between April 1 and September 30, 2020, will
 be delayed by six months. This timeframe may be extended to comply with local, state, and federal guidance/requirements
 surrounding the current crisis.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

Through this FY 2021 Annual MTW Plan, HACSB is re-proposing its Local Family Self-Sufficiency (FSS) Activity (#19) to modify the escrow calculation and apply the Streamlined Lease Assistance (HACSB MTW Activity #22) rent reform activity to Local FSS families. Currently, TLA families may not participate in FSS as a result of the TLA rent and subsidy calculation formula; TLA families who enter the FSS program must be transferred to HACSB's transitional MTW program which utilizes the traditional rent and subsidy calculation formula. The proposed modifications to the Local FSS savings and rent calculations will permit TLA families to participate in the Local FSS and Achievement program. TLA families and Local FSS families are expected to be on similar trajectories; both programs provide coaching and supportive services aimed to help the family on their path to self-sufficiency. The services provided to families in both programs include a personalized needs assessment and development of a goal plan, annual updates with their HACSB CDI case manager, and referrals and access to external partners. Therefore, at implementation of the new Local FSS and Achievement Program HACSB intends to automatically enroll new TLA families into its Local FSS program at admission. Implementation of the Local FSS and Achievement Program until the maximum pilot program size is reached. HACSB intends to expand the Local FSS and Achievement Program to include automatic

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enrollment for all new TLA families after successful implementation and evaluation of the pilot. TLA families will enjoy the benefit of accruing savings while pursuing self-sufficiency goals already part of the TLA program, while the alignment of programs will allow HACSB to leverage services and funding to support families in both programs.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

No changes to benchmarks are anticipated as a result of the proposed changes. HACSB will use data from its tenant database to supply data related to this activity.

v. Planned Significant Changes

None.

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Activity 22: Streamlined Lease Assistance Program

i. Plan Year Approved, Implemented, Amended

- FY 2013: Initial approval.
- FY 2015: Implemented February 1, 2015.
- FY 2016: Modified to add "Streamlined Fixed Lease Assistance for New Non-Elderly/Non-Disabled Households".
- FY 2017: Modified to add a unit size limitation for tenant-based voucher programs.
- FY 2018: Modified the rent tiers for career-able families currently participating in the Streamlined Tiered Lease Assistance program from 21/24/27/30% to 30/33/36%.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

Through this activity, HACSB has implemented an alternative subsidy/rent schedule for households participating in the Housing Choice Voucher and Public Housing programs. The activity applies to:

- Public Housing: all current and new households;
- Housing Choice Voucher: all current and new households not currently participating in or admitted to the Term-Limited Lease Assistance Program.

The rent for families in the Streamlined Lease Assistance (SLA) program is calculated based on a percentage of gross annual income. A minimum rent and baseline rent also apply. The rent percentages were established based on analysis that included deductions and allowances permitted under traditional program regulations, and therefore no deductions or allowances are applied to the calculated rent amount calculated. Households participate in either fixed assistance or tiered assistance, based upon family type.

Fixed Assistance Program for Elderly/Disabled Households:

Families admitted prior to January 1, 2019: The family's rent share (TTP) is the greatest of 24% of their gross income, the minimum rent, or baseline rent.

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Families admitted on or after January 1, 2019: The family's rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent. This component was implemented for new families briefed on or after January 1, 2019.

Tiered Assistance Program for Non-Elderly/Non-Disabled Households:

The family's rent share (TTP) begins at the greatest of 30% of their gross income, the minimum rent, or baseline rent. The income percentage may increase by 3% at each subsequent biennial recertification to a maximum of 36%. The rent tier structure was changed through our FY 2018 Annual MTW Plan, and implemented beginning February 1, 2018. All families received an automatic six-month hardship exemption which delayed any change in tenant portion. HACSB intends to implement the additional rent tiers of 33% and 36% only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families. The additional tiers have not been implemented and HACSB does not anticipate implementing them during FY 2021.

HACSB's minimum rent activity also applies for both Fixed and Tiered assistance. Additionally, a baseline rent for the family is established at each biennial recertification, and future rent amounts may never fall below the baseline rent without a hardship exemption. If the calculated rent amount exceeds the ceiling rent for Public Housing or the contract rent for Housing Choice Voucher families, the lesser of the calculated TTP or rent amount is applied as the family's rent share.

Unit Size Limitation (Tenant-Based Voucher Programs Only):

In order to ensure that households choose a unit that is appropriately sized and affordable for their income situation, households assisted under the Streamlined Lease Assistance Program must select a unit whose number of bedrooms is within one bedroom of the voucher size. For example, a family with a two-bedroom voucher may select a one-, two-, or three-bedroom unit.

Our FY 2018 Annual MTW Plan included approval to require families to select a unit that is the same size as their voucher. Families would not be permitted to lease an over-sized unit. This modification will be implemented only if the subsidy limitation modification described previously does not result in families selecting appropriately sized units.

Subsidy Limitation:

To encourage families to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB intends to implement a subsidy limitation for over-housed families. These are families that have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the family, which results in a greater family rent share than if the family had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount of HACSB's Local Payment Standard. Through this activity, HACSB will limit the

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maximum subsidy for over-housed families to the average subsidy rate for families that are not over-housed with the same size voucher.

Rent Increase Limitation (voucher programs only):

HACSB's FY 2018 Annual MTW Plan included approval to limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example, the average value of rent increases approved in FY 2016 was 10% of the previous contract rent. HACSB is permitted to cap the rent increase at a value less than 10% of the previous contract rent. HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program. At the time of this writing, this flexibility has not been implemented.

At the time of this writing, all existing households have been converted to Streamlined Lease Assistance at their biennial recertification. 152 implementation hardship exemptions have been approved for households for whom the transition to Streamlined Lease Assistance would have caused a substantial increase in the family's share of rent.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations changes for this activity:

- SLA families experiencing a significant loss of income as a result of the current crisis may be approved for a hardship exemption. This new hardship exemption category will follow the application, review, and approval policies and procedures currently in place for other hardship categories;
- Processing of interim recertifications (to the extent that HACSB processes interim recertifications for families served through
 the Moving To Work demonstration), with the exception of interims processed for an approved hardship exemption, will be
 deferred to the earliest practical and feasible date.

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Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

v. Planned Significant Changes

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

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Activity 23: No Child Left Unsheltered

i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial Approval through HACSB's FY 2014 Annual MTW Plan. Implemented on April 1, 2015.
- FY 2015: Modified to expand program eligibility criteria.
- FY 2018: Modified to add twenty tenant-based vouchers for the foster care component.
- FY 2019: Modified through HACSB's FY 2019 Annual MTW Plan, Amendment 1, to add an automatic transition to HACSB's TLA
 or SLA activity after two years of participation in NCLU for families newly participating in the activity.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

The No Child Left Unsheltered program aims to end homelessness of any unsheltered family with children in San Bernardino County, with special attention to the education and well-being of the children and the economic advancement of the parents. No Child Left Unsheltered (NCLU) will help address extremely critical needs of unsheltered families in the county by offering Housing Choice Voucher rental subsidies to families who are identified as eligible unsheltered homeless families with children. The program will also provide families with supportive services and resources such as emergency relief, school connections with community support, and job training for parents.

Through this activity, HACSB has set aside forty (40) Project-Based Vouchers and twenty (20) Tenant-Based Vouchers to be made available to eligible families. The rental subsidy is calculated using the Streamlined Lease Assistance program methodology. HACSB has partnered with a variety of local community service providers, including the school system, to identify families, particularly those with school-age children, who are unsheltered. Each identified family will be encouraged to apply for assistance, and if eligible, will receive assistance after being selected from the waiting list using a preference specifically for this program or as a special admission by referral from a HACSB partner.

Our FY 2019 Annual MTW Plan, Amendment 1, included a modification to this activity to automatically transition eligible families to another HACSB housing program after two years of participation in NCLU. This modification will apply to new NCLU families only.

Foster Care Component

Through our FY 2018 Annual MTW Plan, we modified this activity to add twenty (20) units to allow participation by young adults participating in the Department of Children and Family Services Foster Care Aftercare program. Services will target low-income young

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adults age 18-21 in the Aftercare program who are in need of housing support to transition to stable independent living. Individuals in the Aftercare program receive only limited services through the Foster Care program and are ineligible for housing support through the Foster Care program. Assistance under this component will be subject to the availability of funds. To be eligible for housing support through this component of the NCLU program, the household must:

- Be referred by the San Bernardino County department of Children and Family Services; and
- Be a low-income family as defined by HUD; and
- Meet HACSB's criminal history background screening requirements; and
- Be an active participant in the Aftercare program.

HACSB anticipates that the individuals served through this program will be primarily single individuals, but may also include families with one or more dependent children.

Through this component, HACSB will provide each eligible family up to three years of housing support through the Housing Choice Voucher program. The term of support will coincide with the family's enrollment in the Aftercare program, and the subsidy will be calculated using HACSB's Streamlined Lease Assistance program (MTW Activity 22) methodology. Additionally, the family will be required to engage in supportive services through HACSB's Career Development Initiatives (CDI) department and to complete an Individual Training and Services Plan. To ensure that services provided by the Foster Care program and HACSB's CDI department continue to be accessed during the term of assistance, the family may not exercise portability or mobility.

The family may request an extension of assistance of up to one year beyond their participation in the Foster Care Aftercare program. HACSB will apply the same hardship eligibility criteria and approval procedures as established for the Term-Limited Lease Assistance Program (MTW Activity 20).

Unit Designation

In March 2015, the HACSB Housing Commission and Board of Governors approved the award of the 40 project-based voucher units reserved for this activity to units within the HACSB-owned and HACSB-affiliated non-profit housing stock. HACSB is authorized to award these contracts through a non-competitive process under its Local Project-Based Voucher MTW Activity (activity 11), approved by HUD through HACSB's 2009 Annual MTW Plan. Families housed through this activity typically have significant challenges in locating housing through the traditional tenant-based voucher program. This award gives HACSB, as the property owner, the ability to house the families more quickly and with more flexibility than in the traditional tenant-based voucher program, thus reducing the wait for housing from upwards of 60 days to only a few days within this non-traditional program.

HACSB selected the locations of the 40 project-based voucher units using data from the most recent homeless point-in-time survey. The units will be distributed throughout the county as follows:

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PROPERTY OWNER	NUMBER OF UNITS	COMMUNITIES	
HACSB	26	Kingsley Patio Homes, Montclair Stone Creek Apartments, Loma Linda	Hampton Court Apartments, Redlands Andalusia, Victorville
		Sunset Gardens, Yucaipa	Mesa Gardens, Hesperia
HPI Property Acquisitions LLC	10	Kendall Drive Apartments, San Bernardino	
Kendall Park Apartments, San Bernardino		no	
Summit Place LLC	4	Summit Place, Ontario	

This activity served eight new families and 31 total families in FY 2019, and an estimated \$80,750 in funds were leveraged through the San Bernardino County Department of Behavioral Health for two part-time employees to serve NCLU customers. The second component for young adults participating in the Department of Children and Family Services Foster Care Aftercare program has not yet been fully implemented.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

• Supportive services provided to NCLU families may be reduced and/or deferred based on the availability and ability of HACSB staff and partners to provide those services.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

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iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #4: Increase in Resources Leveraged
- SS #8: Households Transitioned to Self-Sufficiency
- HC #3: Decrease in Wait List Time
- HC #7: Households Assisted by Services that Increase Housing Choice
- Local Metric: Households Housed through This Activity

v. Planned Significant Changes

None.

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Activity 24: Transition for Over-Income Public Housing/Housing Choice Voucher Families

i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial approval. Implemented on April 1, 2015.
- FY 2015: Modified to exclude current participants of our Family Self-Sufficiency program.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

In an effort to create more housing opportunities for families on our Public Housing and Housing Choice Voucher waiting lists, and in recognition of certain families attaining self-sufficiency, HACSB has implemented this activity to transition families who have an annual income which exceeds 80% of area median income ("over-income") off of housing assistance. This activity applies to the Public Housing program, Tenant-Based Housing Choice Voucher program, and Project-Based Voucher program.

Through this activity, over-income families will be given a six-month transition period. After the six-month transition period, families will transition to receiving no housing assistance from HACSB. Public Housing and Project-Based Voucher families will be required to move, and HCV families will have the option of remaining with their current landlord with no assistance or locating alternate housing.

Elderly/disabled families and participants of the Family Self-Sufficiency and Homeownership programs are exempt from this activity. The transition period begins for existing families identified as over-income on April 1, 2015, and at interim or recertification for families that become over-income after April 1, 2015.

If, during the six-month transition period, an over-income family's income falls below 80% of the AMI, then the family will no longer be considered over-income and will not transition off of the program.

Families in the six-month transition period may also qualify for a hardship exemption from this activity for no-fault loss of income and/or death of a family member with income if the change in income results in the family's income falling below 80% of AMI. If a hardship exemption is approved for such situations, the family will be removed from the six-month transition period and will not transition off the program.

This activity was implemented effective April 1, 2015. At implementation, 89 currently assisted households were identified as "over-income" and given notice of the six-month transition period. Ultimately, 49 of those families were removed from the transition either

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due to a hardship or because they were determined to be no longer over-income. This activity is ongoing and we will report further outcomes via our FY 2020 Annual MTW Report.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical. This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), the "stay-at-home" Executive Order issued by California Governor Newsom on March 19, 2020, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including closing offices to the public and reducing the number of employees in the office through telework and alternative work schedules. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2020. As a result, HASCB has implemented the emergency operations change for this activity:

HACSB will delay by six months the termination of assistance for any family whose six-month transition period is scheduled to
end between April 1 and September 30, 2020. This timeframe may be extended to comply with local, state, and federal
guidance/requirements surrounding the current crisis.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metric:

SS #8: Households Transitioned to Self-Sufficiency

v. Planned Significant Changes

None.

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Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing

i. Plan Year Approved, Implemented, Amended

• FY 2016: Initial approval.

ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

This activity allows HACSB to apply an amended definition of elderly for the project-based vouchers at the Horizons at Yucaipa Affordable Senior Housing development in order to meet both the City of Yucaipa's requirements for affordable senior housing as well as the age requirement for the special needs population to be served by units financed under the Mental Health Stabilization Act (MHSA). For purposes of this property, there are two definitions of an elderly (senior) individual.

The Horizons at Yucaipa Affordable Senior Housing development is a two-phase, 77-unit new construction development in the City of Yucaipa. Phase I of the development is 50 units on approximately 4.2 acres of vacant land, and includes 49 Project-Based Vouchers and one manager's unit. Phase II will include 27 units and will also be developed for seniors at least 55 years of age. The Phase II building will incorporate into the Phase I building so amenities can be shared and costs reduced. The development will be 100% affordable housing financed through a combination of the following funding sources:

- 4% Low Income Housing Tax Credits
- Tax Exempt Bond funding
- County HOME
- County Mental Health Services Act funding (MHSA)
- Fee deferrals from the City of Yucaipa
- Permanent debt

Phase I contains 50 units. 10 of the 50 units in Phase I are reserved as MHSA units and carry an age restriction of 60 years old. The property will operate as affordable housing for seniors. For the 10 MHSA units, an elderly (senior) individual shall be defined as one who is 60 years of age or older in order to meet the MHSA requirements. For the remaining PBV units, an elderly (senior) individual

In 2015 HPI broke ground on the Horizons at Yucaipa development, and construction of Phase I was completed in the spring of 2017. The phase achieved full lease-up and full occupancy by May 2017. HPI is currently looking at financing options to begin construction of phase II, 27 additional senior units, in the summer of 2021.

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iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- HC #4: Displacement Prevention
- HC #5: Increase in Resident Mobility
- Local Metric: Additional Units of Housing Made Available (same as Standard Metric HC #1)
- Local Metric: Seniors 55 to 60 Years of Age Housed through This Activity

v. Planned Significant Changes

None.

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Activity 26: Local Disaster Short-Term Rental Assistance Program

i. Plan Year Approved, Implemented, Amended

• FY 2017: Initial approval through FY 2017 Annual MTW Plan, Amendment 1.

ii. Description/Update

In August 2016 the massive Blue Cut Fire burned more than 36,000 acres in the Cajon pass area of San Bernardino County. The fire caused the complete shutdown of the Interstate 15 freeway and railroad lines, mandatory evacuations of an estimated 82,000 persons in at least six cities, and destroyed 105 homes and 216 minor structures². In the immediate aftermath, approximately seventy families displaced by the fire were in need of temporary assistance to stabilize their housing situation.

The Blue Cut Fire illustrated the need for HACSB to have in place a mechanism to provide temporary housing assistance to families in the event of certain local disasters. This proposed activity is designed to meet that need.

Through this activity HACSB will implement a short-term rental assistance program to provide temporary housing choice voucher assistance to families displaced as the result of a local disaster. Except as noted below, HACSB's policies for the Housing Choice Voucher Program shall apply to the Local Disaster Short-Term Rental Assistance Program.

Determination of Local Disaster: Assistance in this program will be limited to families displaced as the direct result of a local disaster. A local disaster is an event that occurs within the County of San Bernardino and may include a natural disaster such as an earthquake, fire, flood, or storm, an act of terrorism, or other event as determined by HACSB. The qualification of a local disaster would be declared by HACSB through a resolution of its governing board.

Wait List: HACSB will maintain a separate wait list for this activity. The wait list will be opened only when a local disaster is declared through a resolution of HACSB's governing board and only to individuals displaced as a direct result of the local disaster.

This program is not a set-aside. No vouchers will be reserved for this activity. Rather, the funding source will be the MTW Block Grant. Assistance provided through this activity may be offset by a decrease in the number of families served through the Housing Choice Voucher Program. However, because this activity will provide short-term assistance to families, any potential offset would be minimal and take place through normal attrition within the program. As an example, if ten families receive one year of assistance through this activity, the offset to the Housing Choice Voucher Program would not be ten families. Because the average length of stay for current non-elderly and non-disabled families in the Housing Choice Voucher Program is nearly 10 ½ years,

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² "CalFire Incident Information – Blue Cut Fire," fire.ca.gov, August 23, 2016. http://www.fire.ca.gov/current_incidents/incidentdetails/Index/1391

serving ten families through one year of short-term assistance is roughly equivalent to serving one family through our Housing Choice Voucher Program.

Eligibility: Families assisted through this activity will be subject to eligibility screening. At a minimum, each family must qualify as low-income (having gross annual income at or below the HUD-published Area Median Income adjusted for family size) and pass HACSB's criminal history background screening.

Term of Assistance: The term of assistance shall be determined by HACSB based upon the nature of the disaster at the time the local disaster is declared. In general, HACSB anticipates the term of assistance shall be six (6) to twelve (12) months. If appropriate, HACSB may provide a hardship extension. In any case, the total term of assistance shall not exceed twenty-four (24) months.

Subsidy Calculation and Reexamination: The rental subsidy and tenant rent portions shall be determined using the formulas established through HACSB's MTW Activity 22: Streamlined Lease Assistance Program. Please refer to the detailed description of the Streamlined Lease Assistance Program in Section IV of this plan for additional information. No reexamination of income will be conducted during the term of assistance, regardless of the length of the term. The table below summarizes the subsidy calculation formula.

HOUSEHOLD TYPE	TENANT RENT PORTION	HACSB Subsidy	
Elderly and/or Disabled Households	The greater of: • 24% of gross income • HACSB's minimum rent (currently \$125) • The baseline rent	Contract rent less tenant rent portion	
Non-Elderly and Non- Disabled Households	The greater of:	Contract rent less tenant rent portion	

Leveraging of Resources: In order to maximize the benefit to assisted families, whenever possible HACSB will engage community partners to provide additional funding, housing stabilization services, and related supportive services to the families assisted through this activity.

HAP Contract and Lease: The terms of the lease and HAP Contract shall be the same as the term of the Local Disaster Short-Term Rental Assistance.

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Portability: Families assisted through this activity may not exercise portability to another jurisdiction unless the receiving PHA will absorb the family.

Subject to Availability: Assistance provided through this activity shall be subject to the availability of funding as determined by HACSB.

HACSB received approval of this activity via its 2017 Annual MTW Plan, Amendment 2, in April 2017. We are now working to incorporate policy revisions to facilitate implementation of the activity. We anticipate that this activity will be operational in 2018. However, HACSB will only house families through this activity in the event of a locally declared disaster.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- HC #3: Decrease in Wait List Time
- Local Metric: Number of Households Served through the Activity

v. Planned Significant Changes

None.

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Activity 27: Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents

i. Plan Year Approved, Implemented, Amended

• FY 2019: Initial approval through FY 2019 Annual MTW Plan, Amendment 2. Partially implemented.

ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

Through this activity, HACSB is authorized to change the TTP calculation to create one that is based upon income bands, applying a flat TTP within each income band instead of basing the calculation of TTP on gross or adjusted income. Additionally, HACSB is authorized to modify the housing authority subsidy calculation as specified below. The activity currently applies to 116 RAD-PBV units at the Waterman Gardens Phase III development, Crestview Terrace, excluding any RAD household exercising right of first return to those units. At the time of this writing, a proposed expansion of this activity has been submitted to HUD and is pending review and approval. The proposed expansion will expand this activity to include eight PBV units to be located at the Daycreek Villas community in Rancho Cucamonga, California, as well as future PBV units on a case-by-case basis. More information about how this activity will apply to the Daycreek Villas PBV units and future PBV units is included in the following sections.

<u>Implementation Update – Crestview Terrace</u>

Most aspects of this activity will be implemented upon completion of construction when families begin leasing the newly developed units (anticipated in CY 2020). However, other aspects of the activity are implemented, such as establishing the Tenant Rent Burden Protection Fund for approved hardship exemptions.

<u>Current Development Status – Crestview Terrace</u>

This third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) is expected to be under construction in CY 2019 and 2020, adding approximately 182 family rental units to complete the one-for-one replacement of Public Housing units formerly located there while also adding market rate units to create a mixed-income community. The development utilizes Demolition/Disposition Transition Fund (DDTF) leveraged with City and County of San Bernardino HOME funds, state of California Affordable Housing and Sustainable Communities funds, private healthcare organization (Dignity Health) funds, and 4% Low Income Housing Tax Credits (LIHTC) coupled with tax-exempt private activity bonds. The current unit breakdown is:

- 116 RAD project-based voucher (PBV) units with tax credits.
- 31 tax credit affordable units.
- 35 market rate units with no RAD, PBV, or tax credits.

The following table contains the breakdown of the 147 affordable units by size and tax-credit income bracket:

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30% AMI TARGET		50% A	MI TARGET	60% AMI TARGET		TOTAL
UNIT SIZE	N UMBER OF U NITS	UNIT SIZE	N UMBER OF U NITS	Unit Size	N UMBER OF U NITS	TOTAL
1 Bedroom	6	1 Bedroom	6	1 Bedroom	10	22
2 Bedroom	21	2 Bedroom	21	2 Bedroom	39	81
3 Bedroom	9	3 Bedroom	9	3 Bedroom	14	32
4 Bedroom	1	4 Bedroom	2	4 Bedroom	7	10
5 Bedroom	2	5 Bedroom	0	5 Bedroom	0	2
TOTAL	39	TOTAL	38	TOTAL	70	147

HACSB Subsidy and Income Band TTP Calculation - Type One

Through this activity, the total tenant portion (TTP) and contract rents for the Crestview Terrace 116 RAD-PBV tax credit units are set as follows:

- TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will be set below 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. At this time, the
 contract rents are anticipated to be set at 91.247% of 110% of the FMR. Contract rents may be increased through an increase
 to the TCAC-published Tax Credit rents.
- The Housing Assistance Payment (HAP) subsidy will be the difference between the contract rent and the TTP. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard RAD-PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

Through these modifications, HACSB is able to apply a simplified rent and subsidy structure without changing the total amount of subsidy provided to support the development.

Hardship Case Criteria

HACSB recognizes that under some circumstances, households may experience a hardship that makes it challenging to pay the applicable rent under this activity. Hardship exemption criteria have been developed for households whose rent burden exceeds 40% while participating in this program.

To be eligible for a hardship exemption, the household must:

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- 1. Have a rent burden greater than 40%. Rent burden is calculated as the household's monthly rent portion (the applicable tax credit rent) divided by the household's gross monthly income; and
- 2. Request a hardship exemption in writing in accordance with HACSB's policies; and
- 3. Be in compliance with HACSB's policies, program rules, and regulations.

A hardship exemption may be approved for the following reasons:

- 1. The family experiences a death of a household member with income;
- 2. Any income-earning member of the assisted family no longer remains in the unit;
- 3. An elderly or disabled household experiences a permanent loss of income;
- 4. Unforeseen and involuntary permanent loss of income for a family member under the age of 18;
- 5. Unforeseen involuntary loss of employment or unforeseen loss of income due to major illness as determined by a medical professional; or
- 6. Unforeseen involuntary permanent loss of income for an adult family member who is attending high school.

If a hardship exemption has been approved, HACSB will reduce the household's TTP to 40% of gross income for a period of six months. During the hardship exemption period, HACSB will continue to pay the HAP subsidy plus the difference between the household's reduced TTP and the tax credit rent ("Hardship HAP" – the difference between 40% of the household's gross income and the applicable tax credit rent). At the end of the hardship exemption period, the household's TTP will return to the tax credit rent and the HACSB subsidy will return to the previous HAP subsidy. For example:

A 3-person household is residing in a 2-bedroom 50% tax credit unit. They pay the tax credit rent of \$758 per month. Their income is \$27,315 per year and their rent burden is 33.3%.

A 17-year-old member of the household experiences an unforeseen and involuntary permanent loss of income. The household's new income is \$21,000 per year. Their rent burden is now 43.3%.

HACSB approves a hardship exemption for the household based upon the unforeseen and involuntary permanent loss of income for a family member under the age of 18. For six months, the household's TTP will be set at 40% of their gross income, or \$700. During the hardship exemption period HACSB will continue to pay to the owner the HAP subsidy of \$564 per month, plus the difference between the TTP and the tax credit rent, or \$58.

At the end of the hardship exemption period, the household's TTP will return to the tax credit rent. The HACSB subsidy will return to \$564.

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No more than one hardship exemption per household may be approved within a 12-month period. Approval will be subject to the availability of funds.

HACSB will apply MTW funding flexibility to create a "Tenant Rent Burden Protection Fund" from which the Hardship HAP will be paid. HACSB and its developer partner will both contribute to this fund to ensure the availability of hardship exemptions for rent-burdened households.

HACSB Subsidy and Income Band TTP Calculation - Type Two

The eight PBV units to be located at the Daycreek Villas community in Rancho Cucamonga, which is expected to begin occupancy in the fall of 2020, will utilize this Type Two calculation (pending approval by HUD through HACSB's 2020 Annual MTW Plan, Amendment 3). Future PBV units under this activity will utilize either the previously approved Type One calculation or this proposed Type Two calculation.

The total tenant portion (TTP) and HAP subsidy are set as follows:

- TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will equal the TTP plus the fixed HAP subsidy, and shall not exceed 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. Contract rents may be increased through an increase to the TCAC-published Tax Credit rents.
- The Housing Assistance Payment (HAP) subsidy will be fixed at \$700. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

Hardship Case Criteria - Type Two

The hardship case criteria for the Type Two subsidy and TTP calculation shall be the same as the previously approved hardship case criteria, except that HACSB will not establish a separate fund from which to pay the Hardship HAP. Instead, Hardship HAP shall be paid using MTW Block Grant funds in the same manner as HAP.

iii. Planned Non-Significant Changes

For both Type One and Type Two calculations, HACSB will conduct annual reexaminations utilizing the annual TCAC recertification to determine the family's income and income band placement. The TCAC recertification will determine the applicable tax credit rent portion (TTP) and, for Type One calculations, the HACSB subsidy amount. HACSB will not perform an independent recertification of the family's income for either Type One or Type Two.

HACSB will also modify the eligibility requirements for both subsidy types to establish a minimum income. The minimum income requirement will ensure that no family is rent-burdened (pays more than 40% of gross income toward rent) at admission.

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iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

• HC #1: Additional Units of Housing Made Available

v. Planned Significant Changes

None.

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B. Not Yet Implemented Activities

HACSB does not currently have any activities that are approved and not yet implemented.

C. Activities on Hold

Activity 3: Alternate Assessment Programs

This activity was approved in our FY 2009 Annual MTW Plan and was placed on hold in FY 2011.

i. Activity Description and Reason(s) for On-Hold Status

This activity was approved through HACSB's FY 2009 Annual MTW Plan and has not been implemented. The activity was placed on hold via HACSB's FY 2010 Annual MTW Plan.

The activity allows HACSB to opt out of the HUD SEMAP and PHAS scoring systems and establish its own program assessment systems designed to measure the quality and timeliness of work performed under the MTW Agreement.

HACSB formally opted out of the PHAS and SEMAP on December 8, 2010, and will continue to retain its high performer status until a new MTW-wide successor system is adopted, at which time HACSB can be fully scored under that system.

At HUD's 2009 Annual MTW Conference we learned that there was an effort to establish an MTW-wide successor to the Section Eight Management Assessment Program (SEMAP) and Public Housing Assessment Program (PHAS) systems currently in place. Rather than develop its own assessment system, HACSB determined that it would instead place this activity on hold until the MTW-wide assessment system is implemented. The MTW-wide assessment system is still in development, and this activity remains on hold pending approval and implementation of that system.

ii. Plan for Reactivation

HACSB continues to participate in a working group consisting of team members from various MTW agencies nationwide in an effort to develop a replacement assessment. A final recommendation will be made pending consensus from the current active MTW agencies.

The exact date for implementation of the MTW-wide assessment system is not yet known. The system will need to be approved by HUD prior to implementation, and a target date has not yet been set.

iii. Non-Significant Changes or Modifications Since Approval

No modifications are proposed for this activity.

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D. Closed Out Activities

Activity 2: Strategic Investment Policies

i. Approval, Implementation, and Close-Out Years

This activity was approved through our FY 2009 Initial Annual MTW Plan and implemented in November 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out in response to HUD's comments regarding the HACSB FY 2019 Annual MTW Plan, wherein HUD stated that Notice PIH 2011-67 (Implementation of New Cash Management Requirements for the Housing Choice Voucher Program) effectively nullifies the activity and requested that the activity be moved to the Closed Out Activities section of HACSB's Annual MTW Plan.

Activity 6: Elimination of Assets

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2009 Annual MTW Plan and was implemented on October 1, 2009. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (this activity), 9 (Elimination of Earned Income Disallowance), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

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Activity 7: Controlled Program Moves

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2009 Annual MTW Plan and implemented on February 1, 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity resulted in a significant decrease in agency costs and staff time spent related to processing voluntary moves. In FY 2017, both costs and time spent reflected approximately a 64% decrease over the baselines. The staff time spent per move was 42% lower in FY 2017 than the baseline value. However, because the total number of moves did not decrease as much as was anticipated, the benchmarks for staff time and cost savings were not reached.

As with all of our MTW activities, HACSB performed internal monitoring of aspects of the Controlled Program Moves activity beyond what was reported through our annual MTW reports. We found that, while this activity resulted in cost and time savings related directly to a reduction in the number of moves processed annually, it also resulted in additional administrative burden in other areas. For example, we identified an increase in the number of moves requested as a reasonable accommodation and/or under the provisions of the Violence Against Women Act (VAWA) after implementation of this activity. Additionally, the two-year lease requirement caused other challenges, especially for families nearing the end of their participation in the Term-Limited Lease Assistance Program. As a result, we eliminated the two-year lease requirement and closed out this activity through our FY 2019 Annual MTW Report.

Activity 9: Elimination of Earned Income Disallowance

i. Approval, Implementation, and Close-Out Years

This activity was initially included in HACSB's FY 2009 Initial Annual MTW Plan and became effective on October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (this activity), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

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Activity 15: Pilot Work Requirement

i. Approval, Implementation, and Close-Out Years

This activity was approved in the FY 2010 Annual MTW Plan. The work requirement was implemented on January 1, 2013, for the Maplewood Homes Public Housing community, and expanded to include all inbound portability families effective August 1, 2010. The work requirement at Maplewood Homes was ended in FY 2016 as a result of the RAD conversion of that site. The work requirement for portability families was ended and this activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out as a result of internal analysis which identified certain challenges in administering the work requirement, as well as advantages of ending the requirement. Ending the work requirement will reduce administrative burden, streamline HACSB's processes, and increase housing choice for families who desire to exercise portability to San Bernardino County. Additionally, ending the work requirement will empower families to make decisions about their housing and employment that are best for their unique family circumstances.

Activity 16: Operating Subsidy for Vista del Sol

i. Approval, Implementation, and Close-Out Years

This activity was approved through the second amendment to our FY 2010 Annual MTW Plan and implemented on April 23, 2010. This activity was closed out via HACSB's FY12 Annual MTW Plan.

ii. Reason(s) For Close-Out

On September 15, 2010, HACSB executed a Project-based Voucher contract, and no longer needs the operating subsidy.

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Activity 17: Local Income Inclusions

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. This activity was modified through HACSB's FY 2015 Annual MTW Plan. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (Elimination of Earned Income Disallowance), and 17 (this activity) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

Activity 21: Utility Allowance Reform

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2012 Annual MTW Plan; it was never implemented. This activity was never implemented.

ii. Reason(s) For Close-Out

This activity allowed HACSB to develop a flat utility allowance schedule for the Housing Choice Voucher Program based on the consumption methodology versus the traditional engineering methodology. However, subsequent development of other programs—namely, our Term-Limited Lease Assistance Program and the Streamlined Lease Assistance Programs—eliminate the need for a utility allowance. These programs are designed to incorporate the cost of utilities into the subsidy amount without the need to apply a utility allowance separately. As a result, the utility allowance schedule is no longer necessary.

HACSB will continue to monitor the success of the Streamlined Lease Assistance and Term-Limited Lease Assistance programs but at this time, the Agency has postponed utility allowance reform indefinitely.

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Section V: Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

The following tables reflect anticipated MTW funding and expenses based upon information available to HACSB at the time of this writing. Some information is currently unavailable. As a result, the values reported at the time this Plan is posted for public comment may change when this Plan is presented to the HACSB Housing Commission for approval, and/or when the Plan is submitted to HUD for approval.

i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	488,621
70600	HUD PHA Operating Grants	97,519,987
70610	Capital Grants	8,997,290
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	8,639,917
71100+72000	Interest Income	177,360
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	130,216
70000	TOTAL REVENUE	115,953,391

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ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	7,057,887
91300+91310+92000	Management Fee Expense	2,719,090
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	158,904
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	157,524
93500+93700	Labor	120,399
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	917,847
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total insurance Premiums	111,376
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	24,710
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	8,808,530
97300+97350	Housing Assistance Payments + HAP Portability-In	95,877,124
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
90000	TOTAL EXPENSES	115,953,391

DESCRIPTION OF VARIANCE BETWEEN ESTIMATED TOTAL REVENUE AND ESTIMATED TOTAL EXPENS
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None.

iii. Description of Planned Use of MTW Single Fund Flexibility

In December 2014 HACSB was approved for conversion of its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program. As units are converted the existing Public Housing funding will be converted to voucher funding. The converted funding is subject to the single-fund flexibility authorized under the second amended MTW Agreement between HACSB and HUD, which allows HACSB to combine Public Housing Operating Funds, Public Housing Capital Funds, and voucher program funds, for the purposes specified in the MTW Agreement.

Single-fund flexibility is crucial to HACSB's affordable housing development efforts. By leveraging multiple internal sources (Capital Fund, RHF, Voucher funding), HACSB is able to maximize funding from private sources and therefore is able to develop a greater number of housing units. For example, within the Waterman Gardens public housing revitalization project, single-fund flexibility is utilized to increase RAD contract rents to match local market rent levels, thereby allowing us to generate more private debt and equity necessary for new construction.

PLANNED USE OF SINGLE FUND FLEXIBILITY

- 1. HACSB's Local FSS activity (#19) is funded using single fund flexibility with savings achieved through other MTW activities.
- 2. HACSB's Career Development Initiatives (CDI) department and its services, which are not a separate MTW activity, are funded using single fund flexibility.
- 3. HACSB's post-assistance tracking survey for Term-Limited Lease Assistance families, implemented in FY 2018, includes a financial incentive for survey participants which is funded through the single fund flexibility.
- 4. HACSB is authorized to use Section 9 (Public Housing) funds defined as Public Housing operating reserves, Capital Fund Grants, Replacement Housing Factor Funds, and Demolition and Disposition Transitional Funds at former Public Housing properties that have been converted to Project-Based Voucher (PBV) properties through the Rental Assistance Demonstration. This authorization applies to accumulated reserves, including MTW reserves, and any future allocation of the funds specified in this authorization. The funds will be used for capital needs rehabilitation, operating expenses, and redevelopment costs.

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B. MTW Plan: Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

No.

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

Yes.

iii. Has the MTW PHA provided a LAMP in the appendix?

Yes. Please see Appendix F.

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.

No changes to the LAMP are anticipated during the Plan Year.

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C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

HACSB has received HUD approval to convert our entire Public Housing portfolio under the RAD program, and is currently in the process of doing so. We anticipate that all units will be converted through the project-based voucher (PBV) program by FYE 2021.

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

No. RAD Significant Amendments were previously included with prior year MTW Plans.

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.

HACSB is not submitting a RAD Significant Amendment through this MTW Plan.

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Section VI: Administrative

- A. **Board Resolution and Certifications of Compliance** –The following items are or will be included with this Plan in Appendix A:
 - a. Resolution of the Housing Commission adopting this Annual MTW Plan
 - b. Certificate of Compliance prescribed by HUD in Exhibit B of the MTW agreement.
- B. **Documentation of Public Process** A detailed timeline and related documentation of the public process for this MTW Plan are included in Appendix B to this Plan.
- C. **Planned and Ongoing Evaluations** In FY 2021, HACSB plans to continue working with Loma Linda University (LLU) for third-party evaluation of certain MTW activities. Please refer to Appendix C for more information.
- D. **Lobbying Disclosures** copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071) are included in Appendix D to this Plan.

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Appendix A: Board Resolution

The following documents are or will be attached in this appendix:

- 1. The Resolution of the San Bernardino County Housing Commission approving this FY 2021 Annual Moving to Work Plan.
- 2. Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan.

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HOUSING AUTHORITY RESOLUTION NO. 2020-87

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF SAN BENARDINO'S ANNUAL MOVING TO WORK PLAN FOR FISCAL YEAR 2020-2021

RECITALS

WHEREAS, the Housing Authority of the County of San Bernardino (HACSB) entered into a Moving to Work (MTW) contract with the United States Department of Housing and Urban Development (HUD) effective March 14, 2008, which governs the regulations of the administration of the Housing Choice Voucher and Public Housing programs; and

WHEREAS, as a MTW agency the HACSB is required to and has prepared an Annual MTW Plan which describes its operations and activities as an MTW agency; and

WHEREAS, the HACSB desires to modify certain previously approved MTW activities; and

WHEREAS, the HACSB has developed its Fiscal Year 2020-21 Annual MTW Plan, to include the proposed modifications to those MTW activities and in accordance with HUD requirements.

OPERATIVE PROVISIONS

NOW, THEREFORE, THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO DOES RESOLVE AS FOLLOWS:

- Section 1. The Board of Commissioners finds that all of the facts set forth in the Recitals are true and correct, and are incorporated herein by reference.
- Section 2. The Board of Commissioners hereby approves the proposed Fiscal Year 2020-21 HACSB Annual MTW Plan, effective July 14, 2020.
- Section 3. A complete copy of the 2020-21 Annual MTW Plan can be found at http://www.hacsb.com/news-reports/mtw-plans-reports-factsheets.
- Section 4. The Board of Commissioners hereby approves the HUD-required Certifications of Compliance with Regulations form authorizing HACSB to submit the proposed Fiscal Year 2020-21 Annual MTW Plan to HUD and certifies that HACSB has complied or will comply with requirements related to the submission and implementation of the Plan.
- Section 5. This resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the Board of Commissioners of the Housing Authority of the County of San Bernardino, by the following vote:

	AVEC	COMMISSIONED, Conner Johnson MacDuff Miller Directo Toronto
	AYES:	COMMISSIONER: Cooper, Johnson, MacDuff, Miller, Pinedo, Tarango
	NOES:	COMMISSIONER:
	ABSENT:	COMMISSIONER:
STAT	E OF CALIFORN	NIA)) ss.
cour	NTY OF SAN BE	

I, Maria Razo, Secretary of the Board of Commissioners of the Housing Authority of the
County of San Bernardino, hereby certify the foregoing to be a full, true and correct copy of the record
of the action taken by the Board of Commissioners, by vote of the members present, as the same
appears in the Official Minutes of said Board at its meeting of Tuesday, July 14, 2020.

Mana Ross Secretary

OMB Control Number: 2557-0216 Expiration Date: 01/31/2021

CERTIFICATIONS OF COMPLIANCE

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

Certifications of Compliance with Regulations: Board Resolution to Accompany the 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 10/01/2020, 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.

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- (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.

Housing Authority of the County of San Bernardino	CA019	
MTW PHA NAME	MTW PHA NUMBER/HA CODE	
I hereby certify that all the information stated herein, as well a herewith, is true and accurate. Warning: HUD will prosecute fo criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31	alse claims and statements. Conviction may result in	
Timothy Johnson	Chair	
NAME OF AUTHORIZED OFFICIAL	TITLE	
NAME OF AUTHORIZED OFFICIAL DocuSigned by:	TITLE 7/15/2020	

^{*} 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.

Appendix B: Public Process

The following steps have been or will be taken by HACSB to ensure a thorough public process in the development and adoption of this FY 2021 Annual MTW Plan.

Date	Action		
May 22, 2020	Public comment period opened. Plan posted on HACSB website and available at all HACSB offices		
	throughout the county.		
May 22, 2020	Public notices published in local newspapers announcing the public hearing dates and public comment		
	period. Newspapers included: San Bernardino County Sun, Black Voice, El Chicano, Inland Valley Daily		
	Bulletin, Precinct Reporter, Daily Press, and The Press Enterprise.		
	Text of Public Hearing notice included in this Appendix.		
June 10, 2020 and	Public Hearings held. Due to the ongoing COVID-19 pandemic, public hearings were held virtually using		
June 18, 2020	Zoom.		
	Minutes of public hearings and summary of public comments received included in this Appendix.		
June 22, 2020	Public comment period closed.		
July 14, 2020	Plan presented to HACSB Housing Commission for approval. Resolution included in Appendix A.		

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NOTICE OF PUBLIC HEARING

On March 14, 2008, the U.S. Department of Housing and Urban Development (HUD) executed a tenyear Moving to Work (MTW) Agreement with the Housing Authority of the County of San Bernardino (HACSB) and in April 2016 that agreement was extended through 2028. As a MTW agency, HACSB is provided with more flexibility and authorization to develop policies that are outside the limitations of certain HUD regulations in order to more successfully achieve its mission and program goals, and to enhance its ability to serve the needs of low-income families in San Bernardino County.

In continuing to develop its MTW program and address community and client needs, HACSB has prepared its Fiscal Year (FY) 2020-21 Annual MTW Plan. The Plan will be made available to the public for review for 30 days starting Friday, May 22, 2020, on HACSB's website at http://www.hacsb.com/news-reports/mtw-plans-reports-factsheets.

Notice is hereby given that HACSB will conduct two public hearings regarding the proposed Plan on Wednesday, June 10, 2020 at 10:00 a.m. and Thursday, June 18, 2020, at 2:00 p.m. Both public hearings will be held online and by telephone as virtual meetings through Zoom. To participate in a virtual public hearing, please visit the Zoom website or call in using the information below.

Wednesday, June 10, 2020, at 10:00 a.m. (PDT)

To join online:

• Go to:

https://us02web.zoom.us/j/88392673648

• **Enter Meeting ID:** 883 9267 3648

To join by phone:

• **Dial**: 1-669-900-6833

• Enter meeting ID: 883 9267 3648

Thursday, June 18, 2020, at 2:00 p.m. (PDT)

To join online:

• Go to:

https://us02web.zoom.us/j/83567706585

• Enter meeting ID: 835 6770 6585

To join by phone:

• **Dial**: 1-669-900-6833

• Enter meeting ID: 835 6770 6585

Instructions for joining an online meeting through Zoom are available at:

https://support.zoom.us/hc/en-us/articles/206618765-Zoom-Video-Tutorials?flash_digest=7e82b55704dea5980d0c6ba820b0e2a961d917ec

Accessibility features for Zoom online meetings are available at:

https://zoom.us/accessibility

If a citizen wishes to challenge the nature of the above action(s) in court he/she may be limited to raising only those issues he/she or someone else raised at the public hearing described in this notice, or in written correspondence mailed to the HACSB Administrative Office, ATTN: MTW Team, 715 E. Brier Drive, San Bernardino, CA 92408 prior to the close of the public comment period on June 22, 2020.

In accordance with the Rehabilitation Act of 1973, HACSB will make reasonable efforts to accommodate persons with disabilities. Please call (909) 890-0644 at least three days in advance if you require special accommodations.

HACSB offers language assistance free of charge. For assistance with this document, please contact our office at (909) 890-0644.

HACSB ofrece asistencia idiomática gratis. Para ayuda con este documento, por favor llámenos al (909) 890-0644.

Equal Housing Opportunity.

HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO PUBLIC HEARINGS JUNE 10 AND JUNE 18, 2020

The Housing Authority of the County of San Bernardino (HACSB), California held public hearings for the Fiscal Year 2019-2020 Annual Moving to Work (MTW) Plan at the Housing Authority's Administration Office at 715 East Brier Drive, San Bernardino, CA 92408 on Wednesday, June 10, 2020, at 10:00 a.m. and Thursday, June 18, 2020, at 2:00 p.m.

Housing Authority Attendees:

Renee Kangas, Management Analyst Nicole Beydler, Senior Management Analyst

Other Attendees:

None.

I. Purpose of the Public Hearing

The purpose of the hearing was to provide interested parties with an opportunity to present questions and/or comments regarding the Housing Authority of the County of San Bernardino's Fiscal Year 2019-2020 Annual Moving to Work Plan before submission to the Housing Authority's Housing Commission, and HUD for approval.

The proposed Plan was made available for public viewing for 30 days beginning May 22, 2020. The plan was advertised in seven local newspapers, on the HACSB website, and copies were available at all HACSB offices located throughout the county.

II. Call for Public Comments

On Wednesday, June 10, 2020, the public hearing convened at 10:00 a.m., with Nicole Beydler, Senior Management Analyst, presiding. Ms. Beydler provided a summary of the MTW requirements, including the process for review and approval of the MTW Plan, and opened the floor for public comment. Marilyn Core of Desert Sanctuary, Inc. in Barstow, California read a prepared comment recommending that HACSB adopt an admission preference for households with survivors of domestic violence, dating violence, sexual assault, or stalking, and that HACSB identify other ways to serve such survivors using its MTW flexibilities. Ms. Core indicated that the

comment is the same as that submitted via email on June 5, 2020, and that she has also submitted a written comment via certified mail. The text of the comments received are included in the following table. The public hearing ended at 10:24 a.m.

On Thursday, June 18, 2020, the public hearing convened at 2:00 p.m., with Nicole Beydler, Senior Management Analyst, presiding. Copies of the Plan were made available for review. No members of the public attended and no public comments were received. The public hearing ended at 2:24 p.m.

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SUMMARY OF PUBLIC COMMENTS 2021 ANNUAL MOVING TO WORK PLAN

Date Received	Received From	Format	Comment and/or Notes
6/5/2020	Marilyn Core Housing Navigator Desert Sanctuary, Inc., Barstow	Email	Thank you for considering these comments on the housing authority's MTW Plan. The policy change requested would also require changes to the housing authority's Administrative Plan and Admissions and Continued Occupancy Policies (ACOP). We urge HACSB to consider amending its current policies to adopt an admissions preference for households with survivors of domestic violence, dating violence, sexual assault, or stalking. This preference would apply for the tenant-based and project-based Voucher waitlists, and for public housing waitlists for any properties that have not yet undergone a Rental Assistance Demonstration (RAD) conversion. Domestic violence is identified as a leading cause of homelessness nationwide, and the current COVID-19 pandemic has highlighted the need for survivors to be able to access safe and affordable housing. Currently, HACSB does not include an admissions preference for survivors, but does include admissions preferences for other populations. Given the importance of survivors being able to access safe housing as expeditiously as possible, the adoption of an admissions preference for survivors is appropriate. To the extent verification is needed, survivors should be able to document eligibility for the preference by choosing among the same documentation options provided in VAWA 2013. The rents here have been going up and pricing our clients out of the market. If they could get admission preference that would be awesome. HACSB should identify other ways that its programs can help survivors obtain safe, permanent housing more quickly, and should explore whether MTW regulatory flexibility can be used in ways that improve survivor outcomes.

Date Received	Received From	Format	Comment and/or Notes
6/10/2020	Marilyn Core	Virtual public	Ms. Core read her comments, which were the same as those submitted
	Housing Navigator	hearing (Zoom)	via email (above).
	Desert Sanctuary, Inc.,		
	Barstow		
6/25/2020	Marilyn Core	Mail (USPS)	HACSB received a letter containing comments on its FY 2021 Annual Plan
	Housing Navigator		(the same as those submitted via email and public hearing, above) and
	Desert Sanctuary, Inc.,		additional recommendations for modifications to its policies with respect
	Barstow		to the Violence Against Women Act (VAWA).

Appendix C: Planned and Ongoing Evaluations

HACSB has contracted with Loma Linda University (LLU) for third-party evaluation of several MTW initiatives. A brief summary of those evaluations is included in this section.

- 1. Term-Limited Lease Assistance Program (Activity 20): LLU is performing a longitudinal study of this activity. The study follows participating families through their progress from initial lease-up through their end of term, tracking their goals and accomplishments. In FY 2017, HACSB implemented an additional tracking component to monitor the self-sufficiency related progress of families for up to two years after commencement of housing assistance through a voluntary survey process. The evaluation will continue in FY 2021, and information gained through the study will continue to be used to adapt and develop the activity.
- 2. No Child Left Unsheltered (Activity 23): Since 2015 LLU has also conducted a longitudinal study of his activity to identify its effects on participating families. The evaluation focuses on family safety and stability, physical and mental health of adults and children, school attendance of children, employment, income, education advancement, self-sufficiency activities, financial choices, use of resources, and other effects on children. The reports and recommendations provided by LLU as a result of the evaluation have informed HACSB's policy decisions regarding the NCLU activity, especially the enhancements and modifications made through HACSB's FY 2019 MTW Annual Plan. The reports indicated that the activity has had strong positive effects on the mental health and well-being of children participating in the program. The evaluation will continue in FY 2021.
- 3. Moving On Program: HACSB has also partnered with Loma Linda University (LLU) for third-party longitudinal evaluation of this activity. LLU will collect data from SPC families before entering Moving On (baseline data), at the time of transition, and periodically during the term of assistance. LLU will provide written reports to HACSB on the outcomes of its study of Moving On families.
- 4. Other Activities: HACSB has also contracted with LLU for future evaluations of HACSB's MTW activities, permanent supportive housing developments such as Golden Apartments and Desert Haven Apartments, and other future programs and services. In FY 2019, a needs assessment was conducted for residents of HACSB's Maplewood Homes RAD housing site to help guide

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the placement of resources for families. Future evaluations will be developed and conducted as requested by HACSB. The evaluations will assess the impact on program participants and determine if program and service delivery methods should be modified. More information about these evaluations will be included as they are developed.

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Appendix D: Lobbying Disclosures

Signed copies of the following forms are or will be included in this appendix:

- 1. Disclosure of Lobbying Activities (SF-LLL)
- 2. Certification of Payments (HUD-50071)

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DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB 0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

(See reverse for public burden disclosure.) 3. Report Type: 2. Status of Federal Action: 1. Type of Federal Action: a. initial filing a bid/offer/application a. contract b. material change b. initial award b. grant For Material Change Only: c. post-award c. cooperative agreement year _____ quarter ____ d. loan date of last report _ e. loan guarantee f. loan insurance 5. If Reporting Entity in No. 4 is a Subawardee, Enter Name 4. Name and Address of Reporting Entity: and Address of Prime: Subawardee × Prime Tier _____, if known: Congressional District, if known: 8, 27, 31, 35, 39 Congressional District, if known: 7. Federal Program Name/Description: 6. Federal Department/Agency: Moving to Work U.S. Department of Housing and Urban Development CFDA Number, if applicable: ______ 9. Award Amount, if known: 8. Federal Action Number, if known: b. Individuals Performing Services (including address if 10. a. Name and Address of Lobbying Registrant different from No. 10a) (if individual, last name, first name, MI): (last name, first name, MI): Potomac Partners DC 700 Pennsylvania Ave SE, Suite 320 Alcalde, Rick; Feliz, Dan Washington, CD 20003 11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a meterial representation of fact Signature: _ Print Name: Maria Razo upon which reliance was placed by the tler 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 falls to file the Title: Executive Director required disclosure shall be subject to a civil penalty of not less than \$10,000 and Telephone No.: (909) 332-6305 not more than \$100,000 for each such failure. 07/15/20 Date: Authorized for Local Reproduction Federal Use Only: Standard Form LLL (Rev. 7-97)

Certification of Payments to Influence Federal Transactions

Housing Authority of the County of San Bernardino

Applicant Name

Program/Activity Receiving Federal Grant Funding	
Moving to Work 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.
hereby certify that all the information stated herein, as well as any inf Narning: HUD will prosecute false claims and statements. Conviction 1012; 31 U.S.C. 3729, 3802)	formation provided in the accompaniment herewith, is true and accurate. In may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010,
Name of Authorized Official	Title
Maria Razo	Executive Director
Signature	Date (mm/dd/yyyy)
Mana Rano	07/15/2020
	

Housing Authority of the County of San Bernardino Capital Fund Program- Five Year Plan & Budget (2017-2021)

AMP 202								
Development	City	Units	Budget	Plan Year	Activities			
Waterman Gardens	San Bernardino	252	888,798	2017	Redevelopment Activity (phase 1)			
Waterman Gardens	San Bernardino	252	1,491,907	2017	Redevelopment Activity			
Waterman Gardens	San Bernardino	252	1,205,427	2017	Redevelopment Activity			
Waterman Gardens	San Bernardino	252	1,847,361	2018	Redevelopment Activity			
Waterman Gardens	San Bernardino	252	389,753	2018	Redevelopment Activity			
Waterman Gardens	San Bernardino	252	1,376,792	2020	Redevelopment Activity			
Waterman Gardens	San Bernardino	252	500,000	2021	Redevelopment Activity			

^{*} note: balance of units in AMP 202 have completed RAD conversion as of 4/2016

Total- AMP 202 7,700,038

AMP 203					
Development	City	Units	Budget	Plan Year	Activities

* note: balance of units in AMP 203 have completed RAD conversion as of 4/2016

Total- AMP 203

AMP 204					
Development	City	Units	Budget	Plan Year	Activities
•			-		

Total- AMP 203 ______

AMP 205					
Development	City	Units	Budget	Plan Year	Activities
Redlands - Lugonia Site	Redlands	115	661,126	2017	Redevelopment Activities

Redlands - Lugonia Site	Redlands	115	597,490	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	647,745	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	639,429	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	649,769	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	756,794	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	1,105,833	2018	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	1,079,508	2019	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	500,000	2021	Redevelopment Activities

^{*} note: balance of units in AMP 205 have completed RAD conversion as of 4/2016

Total- AMP 205

6,637,694

Development	City	Units	Budget	Plan Year	Activities
	* note: balar	nce of units in AMP	206 have compl	eted RAD convers	sion as of 4/2016

Units

City

Budget

Plan Year

Activities

Total- AMP 207

Development

^{*} note: balance of units in AMP 206 have completed RAD conversion as of 10/2019

AMP 208								
Development	City	Units	Budget	Plan Year	Activities			
Cal 19-32, 19-42	High Desert	6	-		Section 32 homes being sold			
Total- AMP 208		<u>-</u>	-	_ _				
AGENCY WIDE								
Development Account			Budget	Plan Year	Activities			

Subtotal Annual Agency Wide Activities 0

Total - Agency Wide X5 years 0

Grand Total- All AMP's 14,337,732

Annual Allocation (including RHF) 2,867,546

Part I: Su	mmary						
PHA Name: Capital Fund Program Grant No. CA16P01950119 Housing Authority of the County of San Bernardino Replacement Housing Factor Grant No. Date of CFFP:					FFY of Grant: FFY of Grant Appro	FFY of Grant: FFY of Grant Approval:	
Type of G	rant				•		
X Origin	nal Annual Statement Reser	rve for Disasters/Emergencies	□ I	Revised Annual Statement (l	Revision No:		
Perfor	mance and Evaluation Report for Period Ending	g:	□ F	inal Performance and Eval	uation Report		
Line	Summary by Development Acco	nint	Total Estin	nated Cost	Total Act	ual Cost (1)	
Line	Summary by Development rece	, diff	Original	Revised (2)	Obligated	Expended	
1	Total non-CFP Funds						
2	1406 Operations						
3	1408 Management Improvement						
4	1410 Administration						
5	1480 General Capital Activity						
6	1492 MovingToWorkDemonstration		\$1,461,207.00				
7	1501 Collater Exp / Debt Srvc						
8	1503 RAD-CFP						
9	1504 Rad Investment Activity						
10	1505 RAD-CPT						
11	9000 Debt Reserves						

⁽¹⁾ To be completed for the Performance and Evaluation Report

⁽²⁾ To be completed for the Performance and Evaluation Report or a Revised Annual Statement

⁽³⁾ PHAs with under 250 units in management may use 100% of CFP Grants for operations

⁽⁴⁾ RHF funds shall be include here

Part I: Su	mmary						
PHA Name: Capital Fund Program Grant No. CA16P01950119 Housing Authority of the County of San Bernardino Replacement Housing Factor Grant No. Date of CFFP:					FFY of Grant: FFY of Grant Approv	FFY of Grant: FFY of Grant Approval:	
Type of G	rant				•		
X Origin	al Annual Statement Reser	ve for Disasters/Emergencies	☐ Re	evised Annual Statement (l	Revision No:		
Perfor	mance and Evaluation Report for Period Ending	g:	☐ Fi	nal Performance and Eval	uation Report		
Line	Summary by Development Acco	unt	Total Estima	ated Cost	Total Act	ual Cost (1)	
Line	Summary by Development Acco	ount	Original	Revised (2)	Obligated	Expended	
12	9001 Bond Debt Obligation						
13	9002 Loan Debt Obligation						
14	RESERVED						
15	RESERVED						
16	RESERVED						
17	RESERVED						
18a	RESERVED						
18ba	RESERVED						
19	RESERVED						
20	RESERVED						
21	Amount of Annual Grant: (sum of lines 2-20)		\$1,461,207.00				

⁽¹⁾ To be completed for the Performance and Evaluation Report

⁽²⁾ To be completed for the Performance and Evaluation Report or a Revised Annual Statement

⁽³⁾ PHAs with under 250 units in management may use 100% of CFP Grants for operations

⁽⁴⁾ RHF funds shall be include here

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

Part I: Summary							
PHA Name:					FFY of Grant: FFY of Grant Approv	val:	
Type of G	rant						
X Origin	▼ Original Annual Statement						
Perfor	mance and Evaluation Report for Period Endin	ng:	☐ Fir	nal Performance and Eval	uation Report		
Line	Summary by Development Acc	ount	Total Estimated Cost		Total Actual Cost (1)		
Line	Summary by Development Acc	ount	Original	Revised (2)	Obligated	Expended	
22	Amount of line 21 Related to LBP Activities						
23	Amount of line 21 Related to Section 504 Activities						
24	Amount of line 21 Related to Security - Soft Costs						
25	Amount of line 21 Related to Security - Hard Costs						
26	Amount of line 21 Related to Energy Conservation Me	easures					

Signature of Executive Director /S/MZK266 Date 08/30/2019	Signature of Public Housing Director	Date
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⁽¹⁾ To be completed for the Performance and Evaluation Report

⁽²⁾ To be completed for the Performance and Evaluation Report or a Revised Annual Statement

⁽³⁾ PHAs with under 250 units in management may use 100% of CFP Grants for operations

⁽⁴⁾ RHF funds shall be include here

Part II: Supporting Pages										
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. Replacement Housing Factor Grant No. CFFP(Yes/No):					Federal FF	Federal FFY of Grant:		
Development Number	General Description of Major Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost (2)		G CWI 1	
Name/PHA-Wide Activities					Original	Revised (1)	Funds Obligated	Funds Expended	Status of Work	
Not associated with any specific development	Assignment of Funds to MTV (1492)) Description : Assignment of BLI	•	1492		\$1,461,207.00					
	Total:				\$1,461,207.00					

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

⁽²⁾ To be completed for the Performance and Evaluation Report

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

Part III: Implementation Schedule for Capital Fund Financing Program							
PHA Name:					Federal FFY of Grant:		
Housing Authority of the County of San Bernardino							
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Possess for Possical Toward Posters (1)		
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	Reasons for Revised Target Dates		

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

Appendix G: Local Asset Management Plan (LAMP)

The First Amendment to the Standard MTW agreement executed on May 21, 2009 allowed HACSB to design and implement a local asset management program. The program should include a description of how it is implementing property-based management, budgeting, accounting and financial management and any deviations from HUD's asset management requirements. In our FY 2010 MTW Annual Plan, we first described our asset management program and amended it through our FY 2010 MTW Plan – Amendment 3 approved on September 15, 2010. Prior to our designation as an MTW agency, HACSB developed a comprehensive 30-year strategic plan in 2008 that serves as a guiding map in achieving our mission, vision and goals. Some of the goals of our plan include helping our participants achieve self-sufficiency, providing timely housing assistance to needy families, increasing housing options and strengthening our agency, our residents and our community. As good stewards of taxpayer's dollars, we pride ourselves in achieving administrative efficiency while providing the best quality service to the families that we serve. Upon closer examination, we feel that the indirect cost rate methodology will best serve our mission, versus our current fee-for-service methodology. In accordance with the federal Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (referred to as OMB "Super Circular"), we elect to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. The cost allocation plan along with the indirect cost rate is described in detail below and we agree to justify the indirect cost rate established.

HACSB did a detailed examination of our current agency structure including our Central Office Cost Center (COCC) structure and confirmed how intertwined our Central Office was to the agency as a whole. The work done by various departments has resulted in agency wide solutions and it is our combined efforts that will help us achieve our goals. This strengthens the need for an indirect cost rate methodology that allows the flexibility to combine resources and achieve inter-department solutions that are represented as a simple unified solution for the families that we serve and our agency. We wish to keep the funding and administrative processes indistinguishable in the eyes of our customers and hope that our collective efforts at various levels provide the best services, the best support, and the best housing choices for our families. This has led to a centralized effort in many services like information technology, community affairs, administrative services, waiting list and development. Details on some of our departments are provided below.

Information Services (I.S.) – Our centralized I.S. department is responsible for the network and server administration, database and software administration, telecommunications and software and report developments for the entire agency. This is done with a dedicated team of

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four individuals that support 260 agency computers in 27 locations throughout our county. They respond to an average of 120 help desk tickets per month that result in around 20 site visits per month.

Community Affairs – Our centralized community affairs department assists in making and strengthening partnerships throughout the County to leverage services and programs to assist our residents in achieving self-sufficiency. These partners include schools, non-profit community organizations, health and human service providers, financial institutions, elected officials, and so forth. Through these efforts, our housing sites are able to sustain services such as childcare, financial literacy courses, health services, parenting courses, to name a few examples. In an effort to outreach to services of greatest need among our residents, in 2010, we partnered with Loma Linda University (LLU) to conduct a detailed needs assessment for one of our Public Housing communities- Maplewood Homes Community (formerly known as Medical Center, 296 units) to determine the appropriate partners that could serve our residents based on resident input and professional analysis. As a result of that assessment, LLU staff and students assisted with follow-up by providing on-site case work management and varying topic workshops. The partnership with LLU has further expanded to include evaluations and assessments of other HACSB MTW initiatives, including Term-Limited Lease Assistance and No Child Left Unsheltered.

Specifically, in an effort to improve the quality of life for residents, HACSB acknowledged the serious health issues caused by second-hand smoke and partnered with the County Department of Public Health to search for viable solutions. Though our vast efforts of educating our residents on the harmful effects of smoking, and surveying them for their feedback, we have transitioned several of our affordable housing sites to 100% smoke free developments. This was an effort achieved through the strength of our partnership and the educational health resources provided to our residents.

Administrative Services – The Administrative Services department assists other offices by providing oversight on matters pertaining to the agency's compliance with state and federal requirements. As an example, this department works to ensures compliance with annual filings of Statement of Economic Interests, the Brown Act, Public Records Requests, Fair Housing and Americans with Disabilities Act (ADA). An agency-wide Needs Assessment is currently being conducted to ensure compliance with current ADA requirements, which will include input from outside agencies and a plan to address any deficiencies. This department also handles our legal issues and is our liaison between the agency and the legal team.

Development – Our centralized Real Estate Development team is responsible for all Real Estate acquisition, rehabilitation, redevelopment and new construction projects. Our dedicated project managers often eliminate the costs associated with outside development and/or construction management consultants. The staff is continuously available to HACSB's in-house property management teams as a technical, as well as planning and implementation resource for non-routine maintenance and emergency rehabilitation projects. The Department also

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assists property management in the completion of all Physical Needs Assessments and due diligence reports for the entire portfolio of HACSB residential developments. This department also either directly oversees or assists in all of the Capital Fund improvement and rehabilitation projects within the public housing or RAD converted housing portfolios and administers all grant funding and debt financing that can be associated. Lately, the development team has been actively involved in implementing HACSB's first projects to create Permanent Supportive Housing for the homeless (2 sites) within HACSB's housing portfolio. They also continue overseeing the ongoing major revitalization of HACSB's oldest public housing sites in Redlands (Lugonia) and San Bernardino (Waterman Gardens). For example, in October 2019 the Waterman Gardens revitalization broke ground with a \$75 million, 184-unit third phase of construction. Finally, Development administers a very successful homeownership program that has helped 248 families overcome their barriers and achieve the American dream of owning a home. It is a program utilizing a variety of methods to achieve goals for our clients, including Section 32 (converted public housing), Section 8 Homeownership, and a Community Land Trust.

Procurement - Our centralized procurement department is responsible for agency wide contracts enable higher cost savings and fiscal prudence. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with the centralized procurement staff to define scopes of work, and ensuring the work is done properly.

Local Asset Management Implementation

Leadership - Our local asset management program will be led by a leadership team consisting of representatives from the following departments: housing programs, development, finance, administrative services, human resources, information technology, procurement and community affairs and policy. They will meet on a biweekly basis to review the combined efforts and ensure the agency is striving to achieve its long-term objectives. This team is also responsible for our Strategic Plan and charters the path annually while ensuring significant milestones are met.

Project-based Management - We expect that all of our programs, regardless of funding source, to be accountable for project-based management, budgeting, and financial reporting. We apply the same expectation of aligning responsibility and accountability to those services that are managed centrally.

HACSB has been operating under project-based budgeting and accounting practices since 2006. We have developed systems and reports to facilitate the onsite management and analysis of budgets, expenses, rent collection and receivables, and purchasing. In accordance with HUD Asset Management guidance, HACSB decentralized its maintenance program in 2008 and each AMP was assigned maintenance personnel, depending on the size and maintenance requirements of the properties in the AMP. HACSB has a decentralized purchasing model

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for the acquisition of goods. Sites staff use a simple purchasing system that enables them to be able to purchase goods directly from their pool of vendors while still enabling management staff to track spending habits. While the acquisition of goods is decentralized, the agency has adopted a hybrid approach to the acquisition of its services. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with the centralized procurement staff to define scopes of work, and ensuring the work is done properly.

Cost Allocation Approach - Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, HACSB has identified all of its direct costs and segregated all its costs into pools, as either a direct or an indirect cost pool.

Direct Costs - OMB "Super Circular" defines direct costs as follows: Direct costs are those that can be identified specifically with a particular final cost objective. HACSB's direct costs include, but are not limited to:

- Contract costs readily identifiable with delivering housing assistance to low-income families.
- Housing Assistance Payments, including utility allowances, for vouchers
- Utilities
- Insurance
- Property-based audits
- Staff training
- Interest expense
- Information technology fees
- Portability administrative fees
- Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities
- Operating costs directly attributable to operating HACSB-owned properties
- Fleet management fees
- Maintenance services for unit or property repairs or maintenance
- Maintenance services include, but are not limited to, landscaping, pest control, decorating and unit turnover
- Community Services department costs directly attributable to tenant services
- Gap financing real estate transactions
- Acquisition costs

- Demolition, relocation and leasing incentive fees in repositioning HACSB-owned real estate
- Homeownership activities for low-income families
- Leasing incentive fees
- Certain legal expenses
- Professional services at or on behalf of properties or a portfolio, including security services
- Extraordinary site work
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families
- Any cost identified for which a grant award is made. Such costs will be determined as HACSB receives grants

Indirect Costs - OMB "Super Circular" defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. HACSB's indirect costs include, but are not limited to:

- Executive
- Communications
- Certain legal expenses
- Development
- Finance
- Purchasing
- Human Resources
- Housing Finance and Asset Management
- Administration staff and related expenses of the Housing Operations and Rental Assistance Departments that cannot be identified to a specific cost objective.

Indirect Services Fees - HACSB has established Indirect Services Fees based on anticipated indirect costs for the fiscal year. Any indirect costs incurred by HACSB in support of its projects and programs will be incurred by the Central Office Cost Center (COCC) and charged out to the programs in the form of a fee. The three fees are:

- Asset Management Fees
- Management Fees
- Bookkeeping Fees

Asset Management Fees – This fee was described in Plan Year 2010 and was modified though our third amendment to the FY 2010 MTW Annual Plan. The Asset Management Fee uses our fungibility to transfer funds among AMPS and allows us to charge an asset management

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fee, regardless of whether a project has excess cash. The COCC will continue to charge the Asset Management to the AMPS at the HUD's determined rate of \$10 per ACC unit

Management Fees – The COCC will continue to charge the Management Fee at the HUD's determined rate of \$85.51 per units leased to the AMPS and 20% of Administrative Fees for Housing Choice Voucher program.

Bookkeeping Fees - The COCC will continue to charge the Bookkeeping Fee at the HUD's determined rate of \$7.50 per unit leased to the AMPS and the Housing Choice Voucher program.

Per the requirements of OMB "Super Circular", the indirect services fees are determined in a reasonable and consistent manner based on total units and/or leased vouchers. The fees are calculated as a per-housing-unit or per-leased-voucher per month charged to each program. HACSB will annually review all of its indirect service fees charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis.

Differences between HUD Asset Management and HACSB LAMP - Under the First Amendment, HACSB is allowed to define costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR 990. HACSB is required to describe in this MTW Annual Plan differences between our Local Asset Management Program and HUD's asset management program. Below are the three key differences:

- HACSB determined to implement an indirect service fee that is much more comprehensive than HUD's asset management system.
 HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Low Income Public Housing (LIPH) property level. HACSB's LAMP is much broader and includes local housing and other activities not found in traditional HUD programs. HACSB's LAMP addresses the entire HACSB operation.
- HUD's rules are restrictive regarding cash flow between projects, programs, and business activities. HACSB intends to use its MTW resources and regulatory flexibility to move its MTW funds and project cash flow among projects without limitation and to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- HACSB charges an Asset Management Fee to all AMPS regardless of excess cash by each AMP by the use of our fungibility.

FDS Reporting – HACSB will continue to report on the HUD's established deadlines following the same format as previous years using the Asset Management with COCC/ elimination.

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Appendix H: Non-MTW Related Information

Special Purpose Programs

In addition to the MTW Voucher Program, HACSB administers other voucher programs and special programs, such as Mainstream, Housing Opportunities for Persons with AIDS (HOPWA), Veteran's Affairs Supportive Housing (VASH), and Continuum of Care.

Mainstream 5 – This program is designed to provide rental assistance to persons with disabilities to enable them to lease affordable private housing of their choice. At the end of FY 2019, we were providing assistance to 86 families through this program.

Mainstream 811 – This program provides much needed housing assistance to non-elderly adult persons with disabilities, including persons transitioning out of institutional housing, at risk of becoming institutionalized, homeless or at risk of becoming homeless, or persons who previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project. At the end of FY 2019, we were providing assistance to 47 families through this program.

Housing Opportunities for Persons with AIDS (HOPWA) - HACSB has partnered with Foothill Aids Project to offer rental assistance and supportive services to persons diagnosed with HIV/AIDS. The Foothill AIDS Project assesses the applicant's duration of participation in their case management program and facilitates location of suitable housing to meet their clients' needs. At the end of FY 2019, we were providing assistance to 43 families through this program.

Veteran's Affairs Supportive Housing (VASH) - HACSB and Veterans Administration Medical Center have partnered to provide tenant-based and project-based vouchers and supportive services to eligible homeless veterans with severe psychiatric or substance abuse disorders. The program goals include promoting maximal Veteran recovery and independence to sustain permanent housing in the community for the Veteran and the Veteran's family. At the end of FY 2019, we were providing assistance to 403 families through this program.

Master Leasing Program – This program is funded by State of California Mental Health Services Act funds and serves mentally ill or developmentally disabled families with emergency shelter housing. Case management and comprehensive support services are provided for residents participating in this program. At the end of FY 2019, we were providing assistance to 14 families through this program.

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Continuum of Care Programs - The Continuum of Care Program provides rental assistance for hard-to-serve chronically homeless persons with disabilities in connection with supportive services funded from sources outside the program. HACSB currently administers the following Continuum of Care vouchers:

- Stepping Stones This program provides rental assistance for chronically homeless individuals and families in connection with supportive services funded through the Department of Behavioral Health (DBH). Under this program, HACSB provides the housing services based on eligible referrals from the Coordinated Entry System (CES) and DBH, matches the housing funds by providing supportive services. At the end of FY 2019, we were providing assistance to 38 families through this program.
- New Horizons This program provides rental assistance for hard to serve persons with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). This is an ongoing program, and all turnover vouchers focus on providing housing to chronically homeless households. Under this program, HACSB provides the housing services based on eligible referrals from the CES and DBH, matches the housing funds by providing supportive services. At the end of FY 2019, we were providing assistance to 192 families through this program.
- Laurelbrook Estates This program assists individuals or families experiencing disabling conditions and homelessness and is a
 Project Based S+C voucher subsidy tied to designated scattered sites throughout the County of San Bernardino. The supportive
 services are offered through the Department of Behavioral Health. At the end of FY 2019, we were providing assistance to 27
 families through this program.
- Project Gateway HACSB formed a partnership with Ontario Housing Authority, Mercy House Living Centers Inc. and
 Department of Behavioral Health (DBH) to provide permanent housing in conjunction with long term supportive services
 including mental health care, employment, self-sufficiency etc. to our homeless community. At the end of FY 2019, we were
 providing assistance to 11 families through this program.
- Cornerstone This program implemented in 2012, and provides rental assistance for hard to serve homeless individuals and
 families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH).
 HACSB provides the housing services based on eligible referrals from the CES and DBH, matches housing funds by providing
 supportive services. At end of FY 2019, we were providing assistance to 54 families through this program.
- Whispering Pines This program implemented in 2012, and provides rental assistance for hard to serve homeless individuals
 and families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH).
 HACSB provides the housing services based on eligible referrals from the CES and DBH, matches housing funds by providing
 supportive services. At the end of FY 2019, we were providing assistance to 24 families through this program.

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• Lantern Woods - This program implemented in 2012 and is a Project Based S+C voucher subsidy tied to designated sites in the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health for homeless individuals and families. At the end of FY 2019, we were providing assistance to 15 families through this program.

HACSB College Scholarship Program

Since 1991, the Housing Authority has been proud to assist eligible participants in achieving their higher educational goals through scholarships. To date, HACSB has awarded 302 students with \$215,500 in scholarships. Current participants/residents in Housing Choice Voucher programs, Public Housing programs, or other HACSB affordable housing communities are eligible to apply. Students need to be accepted by or currently attending a four-year college/university, community college, or technical/vocational school. Students attending a four-year college or university receive a \$1,500 scholarship while community and technical/vocational students receive a \$750 scholarship. The Housing Authority uses non-public funds to promote educational success among their participants.

In 2018 and 2019, five students were awarded scholarships to assist them with their college expenses. The following recipients are attending one of the following colleges/universities: Brandman University, Ashford University, Pasadena City College, Azusa Pacific University, and Prairie View A&M. Their areas of study include majors such as: Chemistry, Psychology, Animation, and Special Education.

Knowledge & Education for Your Success (KEYS)

KEYS is a 501(c)(3) nonprofit corporation created in 2009 by HACSB to consolidate HACSB's array of supportive services, centralize strategic community partnership development, and to provide additional support and services for economically disadvantaged families and children. The development of KEYS created a unique opportunity to utilize non-traditional, non-PHA funding sources to bring additional resources not only to the clients that HACSB serves, but to be able to spread resources to those in need, not directly served by HACSB, subsequently assisting HACSB in achieving our mission of empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

The mission of KEYS is to empower low-income individuals and families in San Bernardino County and to unlock their potential for success. KEYS is committed to a community where individuals and families can lead meaningful and empowered lives and pass that legacy to future generations.

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Over the past fiscal year, KEYS has focused on some of the county's families in greatest need. In January 2015, in partnership with HACSB and the San Bernardino County Transitional Assistance Department (TAD), KEYS launched the Housing Support Program (HSP), a Rapid Rehousing program based on national best practices to rapidly transition eligible homeless families with children back into permanent housing. The Housing Support program was followed by the launch of two additional Rapid Rehousing programs called Keys for Success (KFS) and Keys for Life (KFL) through U.S. Department of Housing and Urban Development's Continuum of Care aimed at serving homeless individuals and families that need housing and intensive case management up to 24 months. KEYS has utilized its experience with the Supportive Services for Veterans and their Families (SSVF) program and housing navigation to rapidly identify and secure permanent housing for families. As part of the ongoing support of the families (up to 24 months) and to ensure stabilization KEYS utilizes its Family Strengthening casework model to ensure resources and tools are in place for the family to maintain their housing over time and increase economic independence.

KEYS continues to focus on a "collective impact" strategy which aligns with a county wide approach.

Together, KEYS, HACSB, and our many community partners are working diligently to change the trajectory for families living in poverty and provide a safe and unique environment to help them thrive and become self-sufficient.

Other Affordable Rental Housing

HACSB owns 1,199 Non-HUD residential units along with 4 commercial units (Frankish Building). Many of those units are affordable as a result of public funds, such as HOME and Redevelopment Housing Set-Aside funds. For more information please refer to the Authority Owned Housing Stock under the Housing Stock Information in Section II: General Housing Authority Operating Information of this report.

Affiliate Non-Profit – Housing Partners I, Inc. (HPI, Inc.) was created in 1991 to develop, own, and manage affordable housing as an affiliate non-profit of HACSB. HPI, Inc.'s designation as a Community Housing Development Organization (CHDO) allows it to apply for and receive HOME funds from the County of San Bernardino, Department of Community Development and Housing and other cities for the acquisition, development and rehabilitation of housing units. With over 28 years of housing development experience behind it, HPI, Inc. provides HACSB the means with which to leverage a variety of public as well as private funding sources to continue to increase the supply of affordable housing throughout the county of San Bernardino.

In 2017 HPI completed the Horizons at Yucaipa development, a new construction affordable senior project that provides 50 units of affordable senior housing. HPI also acquired a 25-unit development in the City of Loma Linda for homeless and affordable Veteran Housing, providing much need supportive services to Veterans living on site. In 2018 HPI completed Loma Linda Veteran Village, a project in partnership with Meta Housing that provides 87 affordable housing units for veterans and their families. In 2018 HPI and

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HACSB began construction on two Permanent Supportive Housing projects to provide 68 units of affordable housing, with onsite services, to homeless individuals within the County of San Bernardino. Both projects will be completed and operational by summer of 2020.

HPI Property Acquisitions LLC is an HPI, Inc. controlled entity that owns 241 units throughout the County of San Bernardino. HPI Inc. and its affiliates own a total of 704 units, detailed in the following table.

AFFILIATE NON-PROFIT							
PROPERTY NAME	Сіту	Units	Ентіту				
Acacia Property	Fontana	28	HPI Property Acquisition LLC				
Desert Village	Victorville	46	HPI Property Acquisition LLC				
Chehalis Property	Apple Valley	30	HPI Property Acquisition LLC				
Kendall Drive Apts.	San Bernardino	37	HPI Property Acquisition LLC				
Kendall Park Apts.	San Bernardino	52	HPI Property Acquisition LLC				
Robert O. Townsend	Montclair	48	HPI Property Acquisition LLC				
Phoenix Apartments	San Bernardino	7	HPI Wall Avenue LLC				
Horizons at Yucaipa	Yucaipa	50	HPI, Inc. Portfolio				
Vista del Sol	Redlands	71	HPI, Inc. Portfolio				
Scattered Sites – Region 1	Loma Linda, Redlands, Yucaipa, Bloomington, Colton, Fontana, Rancho Cucamonga	97	HPI, Inc. Portfolio				
Scattered Sites – Region 2	Ontario, Montclair, Chino	107	HPI, Inc. Portfolio				
Scattered Sites – Region 3	Adelanto, Apple Valley, Hesperia, Victorville, Joshua Tree, 29 Palms, Yucca Valley	131	HPI, Inc. Portfolio				
	TOTAL UNITS	704					

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Appendix I: Fact Sheets

At HACSB, communication and education of team, participants, residents, landlords and community is critical to the success of our innovative programs. We have attached some of our sample Fact Sheets which are handy reference guides about our MTW programs and services. These fact sheets are posted online at **www.hacsb.com** and are also available at our offices.

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HACSB and Loma Linda University Research Partnership

For the past ten years HACSB has partnered with Loma Linda University (LLU) for third-party research and evaluation to help inform policy and shape program design. LLU has conducted nationally recognized research reports and needs assessments of several of our Moving to Work (MTW) initiatives. As a result of our growing partnership, LLU continues to spearhead ongoing and new research and evaluation projects.

Term Limited Lease Assistance (TLA) Program

Two annual research projects are conducted for this program: 1) annual longitudinal research for existing TLA families (since 2012); and 2) post-housing assistance research of up to two-years of a TLA family's exit of the program (since 2017).

The longitudinal study has included nearly 2,000 families to date, and reports the following outcomes:

- 26.5% increase in employment status for families that participate for the full five years.
- 31.4% increase in earned income over the five-year term.
- 12.5% increase in education levels.
- 78.6% of families meet the self-sufficiency goal by their fifth year in the program.

The post-assistance research has included 268 families to date, and provides insight into what happens after families leave the TLA program:

- Employment gains were retained even two years after leaving assisted housing, with 71% of families employed full-time.
- 4.5% of exited families report having purchased a home, 7.2% are staying with a friend or relative, and the majority of exited families report that they are renting their current residence.
- 91.8% of families participating in the research reported positive experiences in the program, including providing safety/security, improved standard of living, and the opportunity to improve their educational/vocational level.

"They helped me realize that if I just believe in myself I can do anything that I put my heart and mind to...they really pushed me to better my life for not only me but for my children... I am forever grateful." — Exited TLA Participant

"My children benefited with better school supplies. They were able to join cheer, football, and baseball. My bills got paid in time" – Exited TLA Participant

Families leaving the TLA program also shared helpful feedback about ways the program could be improved, including increased accountability and supports for families. "I would have them enrolled in monthly classes offered once a month to deal with the core issue of why they are not self-sufficient. They would also have to turn in monthly budgets and expense reports showing what was paid what was used for what." — Exited TLA Participant

Housing Support Program

LLU developed a research and data plan to launch an annual evaluation of the services provided and its impact on the homeless families with children served through the Housing Support Program.

Moving On Strategy

Launched in February 2020, this project will evaluate families "moving on" from the Continuum of Care Shelter Plus Care program into traditional voucher program assistance. Families identified for the Moving On strategy will be evaluated for readiness by LLU, and will be assessed periodically after the transition to ensure their continued well-being.

No Child Left Unsheltered

Since 2016, LLU has provided ongoing research on the progress of the families served through this program. The research outcomes helped inform the decision to modify the program design to allow NCLU families to simultaneously enroll in the Housing Support Program (HSP). In FY 2018, the research scope was expanded to include enhanced program services provided through mutual customer enrollment in HSP.

LLU reports that the number of children participating in the No Child Left Unsheltered program who are at risk of developing a clinically significant behavioral problem decreased by 78%. Families interviewed by LLU shared their experiences in the NCLU program, including the changes they saw in their family dynamics and feedback to improve the program:

"He having problems at school he'll come in and tell me about it. You know, I'll play the game with him and we'll sit down. We'll be laughing giggling. They were things that we weren't doing in beginning, but now we're doing it." — NCLU Participant

"I feel like if everybody gets some kind of therapy or help just some involvement with them. Just coming to reassure them and everybody that "you're okay, let's get you going on something" you know? That's how I feel. Like I said, I feel like in the beginning of the program that they should be more structured to help, if that answers it." — NCLU Participant

Maplewood Homes Needs Assessment

In 2019, LLU provided an updated needs assessment of the community/resident for partner and resource coordination. Previous assessments took place in 2010 and 2017.

Permanent Supportive Housing Programs

In FY 2019, LLU launched the research and data plan in anticipation of new households being served at Desert Haven and Golden Apartments, HACSB's first permanent supportive housing sites for chronically homeless individuals. Data collection began at Golden Apartments in February 2020.





No Child Left Unsheltered Program Housing Homeless Families with Children

No Child Left Unsheltered (NCLU) focuses on housing truly street homeless families with children while also working on the educational and well-being of the children and the economic advancement of the parent(s). To date, 198 people have been housed through this program, which includes 124 children.

Research Partnership

Loma Linda University evaluates the NCLU-participating families. Research shows that the most significant improvements were in the adult's mental health and improvements in the behavioral and academic outcomes of children, as well an overall improvement to their self-esteem and household dynamics.

LLU's recent research also showed that families need at least a yearlong recovery period from homelessness to stabilize themselves. As a result in 2018, HACSB enhanced the supportive services provided by leveraging the resources of the County's Transitional Assistance Department (TAD), Department of Behavioral Health (DBH), and HACSB's non-profit affiliate Knowledge and Education for Your Success (KEYS).

Partners and Supportive Services

New families assisted through NCLU, including those from the Department of Children and Family Services foster care aftercare program, if they qualify, are dually enrolled in TAD's CalWORKs Housing Support Program (HSP). Through the HSP program, families receive financial and other assistance such as utility deposits; transportation, including gas cards and bus passes; credit checks; application fees; assistance obtaining birth certificates and other vital government documents; furnishings; welcome kits; bridge housing; and other types of financial assistance on a case-by-case basis. Families who do not qualify for HSP but do qualify for NCLU are still admitted to the NCLU program and may receive services similar to HSP from the Keys for Life program.

DBH continues to provide behavioral services that include outreach and engagement, case management and clinical therapy services for children and adults to assist with mental health and/or substance abuse treatment. DBH helps individuals who may experience a mental health crisis by accessing the appropriate crisis services to address their situation and provide transportation services to behavioral health appointments, such as Psychiatrist medication evaluation.

Combined, these are all positive steps towards ending family homelessness in our communities.

"She's a normal kid now; she's like everyone else." – NCLU Participant

"[The children] are so happy now that we're all together, because they were always worried for us, where we were going to sleep, if we were warm, you know." – NCLU Participant

For Information on any Homeless Program/Service in the County:

Please dial "2-1-1" to connect with the County's Coordinated Entry System. They will verify eligibility for various homeless programs and services. This service is available 24-hours a day, 7-days a week. There will be no drop-in services.



Appendix J: Summary of MTW Activities

NO.	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Closed Out
3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
4	Biennial and Triennial Recertifications	Cost Effectiveness	FY 2009	Implemented
5	Simplified Income Determination	Cost Effectiveness	FY 2009	Implemented
6	Elimination of Assets	Cost Effectiveness	FY 2009	Closed Out
7	Controlled Program Moves	Cost Effectiveness	FY 2009	Closed Out
8	Local Policies for Portability	Economic Self-Sufficiency	FY 2009	Implemented
9	Elimination of Earned Income Disallowance	Economic Self-Sufficiency	FY 2009	Closed Out
10	Minimum Rent	Economic Self-Sufficiency	FY 2009	Implemented
11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented
15	Pilot Work Requirement	Economic Self-Sufficiency	FY 2010	Closed Out
16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
17	Local Income Inclusion	Economic Self-Sufficiency	FY 2011	Closed Out
18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
19	Local FSS program	Economic Self-Sufficiency	FY 2011	Implemented
20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented
25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Implemented
27	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented

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