



HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO
Building Communities, Changing Lives

80 YEARS
1941 · 2021

2021 Moving to Work ANNUAL PLAN

Housing Authority of the County of San Bernardino



*Building Communities
Changing Lives*

MTW DESIGNATED AGENCY



HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO

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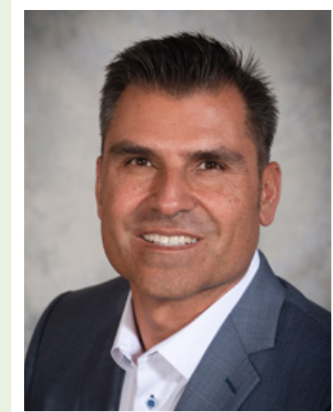
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HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO

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.





HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO

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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.

¹ San Bernardino County 2019 Community Indicators Report

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

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

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

HACSB 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 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.
- *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. **This section includes a non-significant modification to the MTW Activity 26: Local Disaster Short-Term Rental Assistance.**
- *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.

This amendment also includes a new exhibit containing the RAD Conversion Plan for the Los Olivos Public Housing site.

MTW Plan	Approved by HUD
FY 2009 MTW Plan	September 25, 2008
• Amendment 1	• June 29, 2009
FY 2010 MTW Plan	September 30, 2009
• Amendment 1	• November 18, 2009
• Amendment 2	• February 22, 2010
• Amendment 3	• September 15, 2010
FY 2011 MTW Plan	October 18, 2010
FY 2012 MTW Plan	October 5, 2011
• Amendment 1	• November 4, 2011
FY 2013 MTW Plan	September 27, 2012
FY 2014 MTW Plan	May 14, 2014
FY 2015 MTW Plan	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 MTW Plan	November 4, 2015
FY 2017 MTW Plan	February 2, 2017
• Amendment 1	• April 3, 2017
• Amendment 2	• September 27, 2017
FY 2018 MTW Plan	October 25, 2017

MTW Report	Accepted by HUD
FY 2009 MTW Report	April 22, 2010
FY 2010 MTW Report	March 21, 2011
FY 2011 MTW Report	March 20, 2012
FY 2012 MTW Report	July 19, 2013
FY 2013 MTW Report	December 31, 2013
FY 2014 MTW Report	December 31, 2014
FY 2015 MTW Report	December 22, 2015
FY 2016 MTW Report	August 16, 2018
FY 2017 MTW Report	October 4, 2018
FY 2018 MTW Report	October 10, 2019
FY 2019 MTW Report	February 28, 2020

MTW Plan	Approved by HUD
FY 2019 MTW Plan	October 1, 2018
• Amendment 1	• May 7, 2019
• Amendment 2	• September 18, 2019
FY 2020 MTW Plan	October 16, 2019
• Amendment 1	• March 18, 2020
• Amendment 2	• April 3, 2020
• Amendment 3	• Pending approval.
FY 2021 MTW Plan	April 14, 2021
• Amendment 1	• This plan.

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

HACSB 30-Year Strategic Goals

Strategic Goal 10: HACSB clients, programs and properties are embraced by all communities

Strategic 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.

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).

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

ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
Activity 1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
Activity 2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Closed Out
Activity 3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
Activity 4	Biennial and Triennial Recertifications	Cost Effectiveness	FY 2009	Implemented
Activity 5	Simplified Income Determination	Cost Effectiveness	FY 2009	Implemented
Activity 6	Elimination of Assets	Cost Effectiveness	FY 2009	Closed Out
Activity 7	Controlled Program Moves	Cost Effectiveness	FY 2009	Closed Out
Activity 8	Local Policies for Portability	Economic Self-Sufficiency	FY 2009	Implemented
Activity 9	Elimination of Earned Income Disallowance	Economic Self-Sufficiency	FY 2009	Closed Out
Activity 10	Minimum Rent	Economic Self-Sufficiency	FY 2009	Implemented
Activity 11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
Activity 12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
Activity 13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
Activity 14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented

Activity 15	Pilot Work Requirement	Economic Self-Sufficiency	FY 2010	Closed Out
Activity 16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
Activity 17	Local Income Inclusion	Economic Self-Sufficiency	FY 2011	Closed Out
Activity 18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
Activity 19	Local FSS program	Economic Self-Sufficiency	FY 2011	Implemented
Activity 20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
Activity 21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
Activity 22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
Activity 23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
Activity 24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented
Activity 25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
Activity 26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2019 Amendment 1	Implemented
Activity 27	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented
Activity 28	Moving On	Expanding Housing Opportunities	FY 2021	Proposed

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.
- **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.
- **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.

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.

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 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	BEDROOM SIZE					TOTAL UNITS	POPULATION TYPE	# OF UNIFORM FEDERAL ACCESSIBILITY STANDARDS (UFAS) 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, only one Public Housing site was pending conversion through the RAD program. The Los Olivos Public Housing site in Upland is expected to be converted to RAD project-based voucher assistance in 2021.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Los Olivos	98	Rental Assistance Demonstration (RAD) program conversion is expected to take place in mid-2021.
	98	TOTAL PUBLIC HOUSING UNITS TO BE REMOVED IN THE PLAN YEAR

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
None			
	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
Los Olivos, Upland	98	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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
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)
Waterman Gardens Phase 2 – Olive Meadow	61	Leased/Issued	Yes	Family Community, New Development
Andalusia	17	Leased/Issued	No	Family Community, Existing Development
Arrowhead Grove, Phase III	46	Committed	No	Original Public Housing Development, New Construction
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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
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
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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
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 EXISTING PROJECT-BASED VOUCHERS		

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

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL FUND EXPENDITURES DURING THE PLAN YEAR

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 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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL FUND EXPENDITURES DURING THE PLAN YEAR

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, that plan was altered to transition the site through Section 22 Streamlined Voluntary Conversion pursuant to HUD PIH Notice 2019-05 with an expected conversion during 2021. HACSB ultimately determined that a RAD project-based voucher conversion of the site is appropriate, and that conversion is expected 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.

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 the Rental Assistance Demonstration (RAD) program 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.

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.

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

Section III: Proposed MTW Activities

This section provides information about proposed new uses of MTW authority, including newly proposed activities and previously approved activities for which HACSB is proposing significant changes. HUD approval or reapproval is requested for the activities in this section.

Activity 19: Local Family Self-Sufficiency Program

A. Activity Description

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 currently administers two Family Self-Sufficiency (FSS) programs: a non-MTW traditional FSS program which operates under current FSS program regulations and guidelines, and the Local FSS program authorized through this activity which utilizes several MTW flexibilities:

- Escrow earned by Local FSS program families is deposited to an interest-bearing savings account;
- Local FSS families are permitted and encouraged to withdraw funds from their savings account for self-sufficiency activities during the term of participation;
- The balance of the savings account is payable to the family at the completion of the FSS contract only if the family:
 - Is receiving no welfare assistance; and
 - Voluntarily exits housing assistance as a result of their self-sufficiency efforts.

The local FSS activity has resulted in some positive outcomes for participating families, including average household savings of \$6,515¹. However, fewer families than HACSB anticipated have elected to join the Local FSS program. Most families prefer to enter the traditional FSS program which does not require families to exit housing assistance in order to receive their savings balance. The small number of families participating in the Local FSS program has made it difficult to gauge the effectiveness of the Local FSS model in comparison to the traditional FSS program. Additionally, HACSB has implemented rent reform activities, including Biennial and Triennial Recertifications (Activity 4) and Streamlined Lease Assistance (Activity 22), and the modifications to the recertification schedule and income/subsidy calculations would limit FSS participants' ability to accrue savings. HACSB determined it was necessary for FSS families to be exempted from those activities in order to retain the savings accrual structure offered by the traditional recertification schedule and rent calculation. Therefore, HACSB FSS families, including Local FSS families, are recertified annually under the traditional (non-MTW) income and subsidy calculation. This separation of FSS and Local FSS families into separate categories for the purposes of determining income, subsidy, and escrow/savings accrual is administratively burdensome.

¹ Average FSS savings account balance as reported in HACSB's FY 2019 Annual MTW Report.

Through this Plan, HACSB is proposing to substantially modify its Local FSS program. The proposed modifications would apply only to new Local FSS families, while current traditional and Local FSS families would continue under their existing FSS contracts with no modifications. The new Local FSS program will be available to elderly, disabled, and non-elderly/non-disabled families, and will be referred to as the Local Family Self-Sufficiency and Achievement Program. No additional families will be enrolled under the traditional FSS program or current Local FSS program. This modification will be initially implemented as a pilot program, with up to 175 families enrolled under this new Local FSS and Achievement Program. The pilot program will permit HACSB to evaluate the effect of the modifications, including agency cost, family participation, and whether the program aids families on their path to stabilization and self-sufficiency. HACSB may expand the activity beyond the pilot if the evaluation demonstrates that the Local FSS and Achievement Program is successful in its goals. HACSB may permit current participants of its traditional FSS and Local FSS programs to voluntarily transfer to the new Local FSS and Achievement Program, at HACSB's discretion. The Local FSS and Achievement Program will include the following modifications:

- Accrual of savings (escrow) will be decoupled from the calculation of the family's tenant rent portion. Instead, savings will be awarded based on achieving and/or sustaining specified milestones aimed to increase family stability and self-sufficiency. Milestones will include educational, career development, and other self-sufficiency related activities and achievements, such as college graduation, maintaining employment, and participating in community-based activities such as volunteerism.
 - Families will earn savings account deposits for achieving and/or sustaining specified milestones. The amount of the deposit will be fixed based upon the milestone.
 - Milestone achievement/sustainment will be verified at the required annual meeting with the HACSB Career Development Initiatives (CDI) team.
 - HACSB will establish a maximum escrow amount that Local FSS families may earn. That maximum will be based upon further analysis of anticipated costs in order to ensure sustainability of this activity.
 - The savings account will be held by HACSB.
 - If a family exits the FSS program and is determined ineligible to receive the balance of the FSS escrow account, the forfeited escrow balance will not be returned to the HACSB HAP account until the expiration of the family's appeal period.
 - Local FSS families must participate in an annual meeting with a HACSB CDI representative to discuss their FSS action plan, including goal progress. Achievement of milestones will be verified at the annual meeting, and any savings deposits earned for those milestones will be deposited annually after verification. If the family does not participate in the annual meeting, they will forfeit any potential savings deposits that may have been earned for the year.
 - Local FSS families may make interim withdrawals from their FSS savings balance after their first year of participation for certain self-sufficiency related purposes. The amount of the withdrawal may not exceed the savings account balance at the time of withdrawal.

- Local FSS families will be eligible to receive the balance of their savings account if all family responsibilities under the contract have been fulfilled, including:
 - Achieved full-time employment OR income equivalent to 80% of the Area Median Income for the family size OR 30% of the family's gross income equals the applicable Fair Market Rent for the family size; and
 - Maintained compliance with program rules and regulations; and
 - Is no longer receiving cash aid.
- In the event of proposed forfeiture of the family's FSS savings account, HACSB will revert the funds to its HAP account after the family's opportunity to appeal the proposed forfeiture, including any informal hearing taking place as part of that process, has expired and a final determination has been reached.
- Local FSS families who choose to exercise portability to another jurisdiction may not continue participation in the HACSB Local FSS program.
- Unless otherwise specified, all active HACSB MTW activities (including rent reform activities) will apply to Local FSS families.

B. Activity Metrics Information

In accordance with HUD Form 50900, HACSB will continue to report on this activity using the following metrics, but will rebenchmark each metric at the point of implementation:

- 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.

C. Cost Implications

HACSB will prepare a detailed impact analysis prior to implementing the proposed modifications. The impact analysis will inform HACSB's determination of milestone achievements and their associated savings deposit values, the maximum escrow amount, and the number of participants who may participate in the Local FSS and Achievement Program. HACSB intends to design the pilot program

so that the cost of the program is comparable to the cost of HACSB's current FSS programs. HACSB will continue to apply to HUD for reimbursement of FSS escrow deposits made under the Local FSS and Achievement Program.

D. Need/Justification for MTW Flexibility

This activity will allow HACSB to implement a streamlined FSS savings (escrow) calculation method that will provide incentive to families who are working, seeking work, or participating in job training, educational, or other programs that assist in obtaining employment and becoming economically self-sufficient.

HACSB requests authority to waive the following statutes and regulations to undertake this proposed activity:

- 24 CFR 984 – Section 8 and Public Housing Self-Sufficiency Program; and
- Other statutes and regulations waived under previously approved and currently active HACSB MTW activities.

These authorizations will permit HACSB to:

- Modify the FSS savings (escrow) calculation and accrual methods;
- Specify and apply local requirements for graduation from the Local FSS and Achievement program and disbursement of savings accrued by the family;
- Limit participation in the Local FSS and Achievement Program to families within HACSB's jurisdiction; and
- Apply other previously approved and currently active HACSB MTW activities to Local FSS and Achievement Program families.

Activity 28: Moving On

A. Activity Description

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

Through this activity, HACSB will allow families participating in the Continuum of Care (CoC) programs administered by HACSB to voluntarily transfer into HACSB's tenant-based MTW voucher program. Families will be evaluated for readiness to transition from the CoC program, which includes supportive services such as case management, employment assistance and job training, housing search and counseling services, life skills training, mental health services, outpatient health services, and other services provided by the San Bernardino County Department of Behavioral Health (DBH), into tenant-based MTW housing assistance without those services. This activity will allow HACSB to ensure housing stability while also providing families the opportunity to take their next step toward housing independence. Additionally, HACSB will be able to serve new chronically homeless families in need of the supportive services and housing assistance offered through the CoC program as families voluntarily transition into the tenant-based MTW voucher program.

Family Selection and Transition

Families participating in the CoC program will be evaluated by DBH using the Supportive Service Level of Care Assessment (LCA) developed by DBH. The LCA evaluates housing, mental health, and physical health domains to determine readiness to transition. Families identified by DBH as ready to transition will be referred to HACSB for the Moving On program. HACSB will review the family's potential post-transition rent burden and confirm the family's readiness to transition using the transition assessment developed in partnership with Loma Linda University. The transition assessment is based upon the self-sufficiency matrix and evaluates life skills, income, education, and other domains. If HACSB confirms readiness, the family will be invited to voluntarily transition to the HACSB tenant-based MTW voucher program.

Transition from the CoC program into HACSB's tenant-based MTW voucher program is voluntary. Invited families may elect to remain in the CoC program without penalty. Families who elect to voluntarily transition will be formally exited as participants of the CoC program and admitted into HACSB's tenant-based MTW voucher program as a special admission under Moving On.

Rent and Subsidy Determination

The housing assistance subsidy calculation for Moving On families mirrors the Streamlined Fixed Assistance Program for Elderly/Disabled Households as established through HACSB's MTW Activity 22 - Streamlined Lease Assistance (SLA), except that the rent family's rent share (TTP) is the greatest of **24%** (not 30%) of their gross income, the minimum rent, or baseline rent. All other components of the SLA activity shall apply to Moving On families.

Other Applicable MTW Activities

All other active HACSB MTW activities applicable to tenant-based voucher families also apply to Moving On families, except:

- 20 - Term-Limited Lease Assistance; and
- 23 - No Child Left Unsheltered.

B. Activity Metrics Information

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 #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

C. Cost Implications

This activity is anticipated to result in no net change to housing subsidy and administrative costs paid by HACSB. The families served through this activity will have incomes similar to those of other families admitted to HACSB's tenant-based Housing Choice Voucher program. HACSB anticipates that housing subsidy costs for Moving On families will be similar to the subsidy costs for other families.

D. Need/Justification for MTW Flexibility

This activity will allow HACSB to provide continuous housing assistance to families who voluntarily transition to Moving On, while simultaneously creating space within the COC program for new families to be assisted.

HACSB requests authority to waive the following statutes and regulations to undertake this proposed activity:

- 24 CFR 982 Subpart E – Admission to Tenant Based Program;
- 24 CFR 982.503 – Payment standard amount and schedule;
- 24 CFR 982 Subpart K – Rent and Housing Assistance Payment;
- Other statutes and regulations waived under previously approved and currently active HACSB MTW activities.

These authorizations will permit HACSB to:

- admit families to the tenant-based MTW voucher program under Moving On as referral-based special admissions instead of through the tenant-based voucher program wait list;
- apply the rent and subsidy calculation flexibilities described above; and
- apply other previously approved and currently active HACSB MTW activities to Moving On families.

E. Rent Reform/Term Limit Information

i. Impact Analysis

(1) How the activity will impact household rent/tenant rent share.

HACSB intends to screen each family referred by DBH to determine the potential change in the family's rent portion under the Moving On activity, and will advise the family of the amount of rent they would pay under this activity. HACSB intends to focus on families whose rent will decrease, stay the same, or increase by no more than \$50.

(2) How HACSB will implement and track the activity & identify any unintended consequences/impacts.

This activity will be implemented as soon as possible after HUD approval and adoption of corresponding Administrative Plan changes by the HACSB Board of Commissioners. Implementation is anticipated to take place in early CY 2021. HACSB will coordinate with its partners in this activity, DBH and LLU, to implement the activity.

In addition to the HUD Standard Metrics required for this activity, HACSB will internally monitor a variety of performance indicators, including but not limited to: family rent burdens, housing subsidy costs, changes in family income and employment levels, rent increases, leasing rates, hardship exemptions, and compliance with MTW statutory requirements. 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.

Based on outcomes identified through the reevaluation components listed above, this activity may be modified as necessary to meet its objectives.

(3) Numerical analysis (intended/possible impacts of the activity – rent burden, households affected, etc.)

This impact analysis is for the newly proposed MTW Activity 28: Moving On. The activity will not apply to existing MTW households. HACSB wishes to apply an existing rent calculation model to Moving On families in order to minimize the administrative burden of implementation, and therefore seeks to apply the HACSB Streamlined Lease Assistance (SLA) rent calculation to Moving On families. SLA currently utilizes a 30% rent calculation for all new families. Previously, SLA included a 24% rent calculation for elderly/disabled households. This analysis provides a comparison between the current tenant rent under the Continuum of Care (CoC) program administered by HACSB, the potential tenant rent under the SLA at 30% rent calculation, and the proposed tenant rent under the SLA at 24% rent calculation, and discusses the reasons for selecting the SLA at 24% rent calculation. The tenant rent for 22 CoC participants, all of whom

have been identified as ready to move, was analyzed to determine potential impacts. The tables below illustrate the potential rent changes for this sample of potential Moving On participants.

The transition from the CoC program to Moving On is voluntary and supports participant choice for those who no longer need or want intensive services to live independently. The benefits of transition to Moving On include the ability to exercise portability, to move to a high opportunity area under HACSB's Local Payment Standards, to experience less frequent income recertifications, and defer reporting of income increases. However, increased tenant rent is a potential disadvantage of the transition and may discourage families from transitioning to Moving On. The purpose of this impact analysis was to identify the rent calculation that offers the greatest advantage to encourage voluntary transition.

30% Rent Calculation

Twenty potential Moving On participants (91%) would experience a rent increase under the 30% SLA rent calculation method. The potential monthly tenant rent change for this sample ranged from a \$169 decrease to a \$748 increase, with an average change of \$149 and a median change of \$126. The average potential increase was \$173, with a median increase of \$128. The average rent increase under the 30% method would be a major disadvantage of Moving On and HACSB anticipates it would result in only a few volunteers.

24% Rent Calculation

The 24% rent calculation was considered because it more closely resembles the rent calculation under the CoC program, which includes deductions and allowances excluded under the SLA rent calculation. Fourteen potential Moving On participants (64%) would experience a rent increase under the 24% SLA rent calculation method. The potential monthly tenant rent change for this sample ranged from a \$225 decrease to a \$638 increase, with an average change of \$77 and a median change of \$40. Five potential participants will have a rent increase of less than \$50 per month and eight participants will experience a rent decrease. Based upon the data, the 24% rent calculation will benefit more participants and could result in more CoC program participants choosing to voluntarily transition.

Current CoC Program Tenant Rent	30% Calculation		24% Calculation	
	Tenant Rent	Change	Tenant Rent	Change
\$448	\$279	(\$169)	\$223	(\$225)
\$1,262	\$1,436	\$174	\$1,148	(\$114)
\$696	\$779	\$83	\$623	(\$73)

Current CoC Program Tenant Rent	30% Calculation		24% Calculation	
	Tenant Rent	Change	Tenant Rent	Change
\$304	\$289	(\$15)	\$233	(\$71)
\$793	\$924	\$131	\$739	(\$54)
\$254	\$279	\$25	\$223	(\$31)
\$490	\$535	\$45	\$465	(\$25)
\$681	\$826	\$145	\$660	(\$21)
\$178	\$254	\$76	\$203	\$25
\$158	\$233	\$75	\$187	\$29
\$253	\$349	\$96	\$293	\$40
\$233	\$329	\$96	\$273	\$40
\$156	\$251	\$95	\$201	\$45
\$103	\$390	\$287	\$156	\$53
\$159	\$286	\$127	\$228	\$69
\$43	\$172	\$129	\$138	\$95
\$0	\$125	\$125	\$125	\$125
\$107	\$311	\$204	\$248	\$141
\$343	\$573	\$230	\$524	\$181
\$4	\$292	\$288	\$234	\$230
\$39	\$787	\$748	\$628	\$589
\$363	\$651	\$288	\$1,001	\$638
Average Values				
\$321	\$470	\$149	\$398	\$77
Median Values				

Current CoC Program Tenant Rent	30% Calculation		24% Calculation	
	Tenant Rent	Change	Tenant Rent	Change
\$243	\$320	\$126	\$241	\$40

(4) How HACSB will weigh consequences/benefits of the activity to determine whether it should be adjusted/terminated/reduced/ continued/expanded.

Please refer to section iii, below.

ii. 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. HACSB will apply the previously approved hardship exemption criteria developed for the Streamlined Lease Assistance Program (HACSB MTW Activity 22) to Moving On families.

iii. Description of Annual Reevaluation

HACSB's annual reevaluation of this activity will include:

- Moving to Work Reporting: HACSB will use information from its tenant database and any other available data sources to report on the HUD-required standard metrics;
- Internal Monitoring: HACSB will internally monitor a variety of performance indicators, including but not limited to: family rent burdens, housing subsidy costs, changes in family income and employment levels, rent increases, leasing rates, hardship exemptions, and compliance with MTW statutory requirements;
- Third-Party Evaluation: HACSB has partnered with Loma Linda University (LLU) for 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.

Based on outcomes identified through the reevaluation components listed above, this activity may be modified as necessary to meet its objectives.

iv. Transition Period

Not applicable. This activity will apply only families electing to voluntarily transition out of the SPC program; therefore no transition period is required.

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.

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.)

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, HACSB 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

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.

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.

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

- 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, HACSB 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.

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.

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

- 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.

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;

- 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);
 - 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;

- 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 not 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.

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.

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.

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, HACSB 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

- 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.

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

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, HACSB 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.

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.

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

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, HACSB 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.

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 career-able 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.

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:

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.

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

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, HACSB 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 will begin with a pilot, and HACSB will enroll all new TLA families into 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

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.

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.

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

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, HACSB 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.

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.

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

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:

Property Owner	Number of Units	Communities
HACSB	26	Kingsley Patio Homes, Montclair Stone Creek Apartments, Loma Linda Sunset Gardens, Yucaipa Hampton Court Apartments, Redlands Andalusia, Victorville Mesa Gardens, Hesperia
HPI Property Acquisitions LLC	10	Kendall Drive Apartments, San Bernardino Kendall Park Apartments, San Bernardino
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, HACSB 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.

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.

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

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, HACSB 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.

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.

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.

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 or at risk of displacement from their home due to 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 or at risk of displacement 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,

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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 30% of gross income • HACSB’s minimum rent (currently \$125) • The baseline rent 	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.

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

Eligibility for temporary housing assistance under this activity is expanded to include families at risk of displacement from their homes as a direct result of a local disaster. 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.

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.

Implementation Update – Crestview Terrace

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.

Current Development Status – Crestview Terrace

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:

30% AMI Target		50% AMI Target		60% AMI Target		Total
Unit Size	Number of Units	Unit Size	Number of Units	Unit Size	Number of Units	
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:

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.

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.

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.

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.

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.

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.

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.

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.

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

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 EXPENSES

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.

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.

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.

Yes. A RAD Conversion Plan for the conversion of the Los Olivos site is submitted with this Plan as Exhibit 1 and a RAD Significant Amendment containing additional elements not contained in the Conversion Plan is included as Appendix I to this Plan.

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.

The RAD Conversion Plan included as Exhibit #1 to this Plan and RAD Significant Amendment included as Appendix I to this Plan include the proposed RAD-PBV conversion of the Los Olivos Public Housing site. This is the first Conversion Plan and Significant Amendment to include the Los Olivos site.

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.

Exhibit 1: RAD Conversion Plan

The Housing Authority of the County of San Bernardino (HACSB) is amending its Moving to Work Annual Plan for 2021 because it is converting its final multi-family Public Housing community via the Rental Assistance Demonstration (RAD) program.

Conversion to Project Based Rental Assistance or Project Based Vouchers

Any public housing units converting to assistance under RAD long-term Project Based Rental Assistance or Project Based Voucher contracts shall no longer be subject to the program rules applicable to public housing. The formerly public housing units which become Section 8 units will be subject to the rules of the applicable Section 8 program, as modified by a few rules specific to RAD converted units. These specific RAD-related rules are intended to apply a few important provisions of the public housing rules to the RAD converted units, even though they would not normally be applicable in the Section 8 context.

HACSB currently anticipates converting all public housing units except one single family home in its portfolio to Project Based Vouchers under the guidelines of PIH Notice 2019-23, REV-4 and any successor Notices. However, HACSB may add the remaining public housing single family home into the Los Olivos RAD transaction during the conversion process. Upon conversion to Project Based Vouchers, HACSB will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2019-23, REV-4 to be applicable to the Project Based Voucher units. These resident rights, participation, waiting list and grievance procedures are appended to this amendment at Attachment 1. With respect to the Portfolio RAD conversion, the units will be operated consistent with operating policies of HACSB and the all the sites' residents' associations subject to applicable regulatory requirements. All units converted to Project Based Vouchers under the RAD program will be operated consistent with HACSB's Project Based Voucher program rules referenced in this annual plan to the extent not specifically required to operate in a different manner by the regulatory and statutory requirements of the RAD Project Based Voucher program referenced above.

During the course of the conversion implementation, the agency will make a final determination regarding whether to convert to Project Based Rental Assistance or Project Based Vouchers. These determinations will be made on a site-by-site basis. A summary of variances between RAD Units and typical Project Based Rental Assistance units and Project Based Voucher units is appended to this amendment at Attachment 2.

Compliance with Fair Housing and Civil Rights Requirements

HACSB is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Implications of RAD Conversion on the Capital Fund Budget

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HACSB with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACSB may also borrow funds to address their capital needs. The Authority's Capital Fund budget related to converted properties is provided to the property via the Housing Assistance Payment subsidy.

In the event that the RAD applications currently pending and not yet approved are awarded to HACSB, HACSB anticipates the conversion of its entire inventory of public housing units under RAD over the course of the next few years, in which event the Capital Fund Program will be reduced to zero.

Regardless of any funding changes that may occur as a result of conversion under RAD, HACSB certifies that it will maintain its continued service level.

This conversion will have no impact on OFFP or EPC funding as there is no open OFFP or EPC. There will be no impact to RHF as a result of this conversion.

Please find specific information related to the Public Housing Development(s) selected for RAD appended to this amendment at Attachment 3.

Resident Rights, Participation, Waiting List and Grievance Procedures

Additional detail regarding resident rights, participation, waiting list and grievance procedures in connection with the post-conversion Project Based Voucher units is appended to this amendment as Attachment 1.

The conversion plan was presented to the Los Olivos residents at the time when the conversion was originally proposed, and again at two virtual meetings held with residents in July 2021. No challenged elements or policies or concerns were received from the residents or RAB.

Site Selection and Neighborhood Standards Review

TBD (Not applicable at this time). This conversion is currently under review by the RAD Office and their site selection and neighborhood standards review is not yet complete. However, HACSB anticipates no challenges associated with such review because this conversion will take place at an existing site and does not include any transfer of assistance or relocation.

Relocation Plans

There is no anticipated relocation of residents for the RAD conversion.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), HACSB is redefining the definition of a substantial deviation from the agency's annual plan to exclude the following RAD-specific items, provided that the adjustments to the RAD plans are authorized by the Board of Commissioners in the normal course of business:

- Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion;
- The decision to convert to either Project Based Rental Assistance or Project Based Vouchers, such that properties currently identified to convert to Project Based Vouchers may convert to Project Based Rental Assistance and properties currently identified to convert to Project Based Rental Assistance may convert to Project Based Vouchers;
- The date the significant amendment is submitted to the PHA Plan website;
- Changes in the number of de minimis units up to the 5% figure permitted by the RAD program rules;
- Decisions to dedicate a portion of the agency's existing capital funds budget and/or public housing reserves as a source of funds for purposes of a RAD conversion and recapitalization transaction; and
- Detailed development of the plans for the transfer of waiting lists to post-RAD conversion waiting lists.

Attachment 1
Resident Rights, Participation, Waiting List and Grievance Procedures
Applicable to Properties Converting to Project Based Vouchers

Excerpts of PIH Notice 2012-32: Sections 1.6.C and 1.6.D

C. PBV Resident Rights and Participation

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- 2. Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.
- 3. Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR § 983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.
- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that

uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP
- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
- Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. **Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to

their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

- 6. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
- 7. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
 - a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the

premises is threatened; or

- In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR §982.555(a)(1)(i)-(vi),¹ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provides opportunity for an informal hearing before an eviction.

¹ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.,) is covered by this waiver.

9. **Capital Fund Education and Training Community Facilities (CFCF) Program.**

CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.¹
3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** Under existing PBV program rules, projects that qualify as "existing housing" under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as "existing housing." Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.²
4. **Establishment of Waiting List.** In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the converted project's initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA's policies for waiting list management, including the obligation to affirmatively further fair housing.

¹ For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

² Applicable to projects with nine or more units.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁴

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.
6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

⁴ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

- 8. Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Attachment 2

List of RAD Program Elements Affecting Resident Rights and Participation Waiting List and Grievance Procedures for PBV and PBRA (Variances Between RAD Units and Typical PBV or PBRA Units)

Project Based Voucher Requirements (Section 1.6.C of PIH Notice 2012-32)	Project Based Rental Assistance Requirements (Section 1.7.D of PIH Notice 2012-32)
<ol style="list-style-type: none"> 1. No re-screening of tenants upon conversion; 2. Resident right to return if relocated as a result of conversion; 3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA; 4. Continued eligibility for PH-FSS and ROSS-SC programs; 5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032. 6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ol style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. 30 days in any other case unless State or local law provide for a shorter time period. 7. Grievance process - See PIH Notice 2012-32 Section 1.6.C.7 8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.6D 9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.6.C.8.) 10. Resident Participation and Funding - See PIH Notice 2012-32 Attachment 1B.2 11. Renewal of Lease - PHA's are required to renew the lease at expiration unless good cause exists for non-renewal. 	<ol style="list-style-type: none"> 1. No re-screening of tenants upon conversion; 2. Resident right to return if relocated as a result of conversion; 3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA; 4. Continued eligibility for PH-FSS and ROSS-SC programs; 5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032. 6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ol style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. in all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply; 7. Grievance process - See PIH Notice 2012-32 Section 1.7.B.6 8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.7.C 9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.7.B.7.)
	N/A
	N/A

Attachment 3

Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Los Olivos
PIC Development ID #	CA019000210
Conversion Type	PBV (Tentative)
Total Current Units	98
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD
Pre-Conversion Bedroom Type	8 One-Bedroom Units 62 Two-Bedroom Units 24 Three-Bedroom Units 4 Four-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB's public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	RAD Application has been approved and the Commitment to Enter into Housing Assistance Payments (CHAP) has been issued.

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, Amendment 1.
2. Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan.

HOUSING AUTHORITY RESOLUTION NO. 2021-104

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 BERNARDINO'S 2021 ANNUAL MOVING TO WORK PLAN, AMENDMENT 1

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 the previously approved MTW activity 26, Local Disaster Short-Term Rental Assistance Program, and to incorporate the Rental Assistance Demonstration (RAD) Conversion Plan for the Los Olivos Public Housing site; and

WHEREAS, the HACSB has developed its fiscal year 2020-2021 Annual MTW Plan, Amendment 1, to include the proposed modifications 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 2021 HACSB Annual MTW Plan, Amendment 1, effective February 9, 2021.

Section 3. A complete copy of the 2021 Annual MTW Plan, Amendment 1, can be found at <https://hacsb.com/moving-to-work>.

Section 4. 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:


AYES: Commissioner Johnson, Cooper, MacDuff, Miller, Muñoz, Pinedo

NOES:

ABSENT:

STATE OF CALIFORNIA)
)
COUNTY OF SAN BERNARDINO) ss.

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, February 9, 2021.



Secretary

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.

- (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

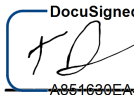
MTW PHA NAME**MTW PHA NUMBER/HA CODE**

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

Timothy Johnson

Chair

NAME OF AUTHORIZED OFFICIAL**TITLE**

DocuSigned by:

 A861630EA40D44B...

7/15/2020

SIGNATURE**DATE**

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

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, Amendment 1.

Date	Action
November 23, 2020	Open public comment period. Plan posted on HACSB website and available at all HACSB offices throughout the county.
November 25 to December 3, 2020	Public notice published in the following local newspapers announcing the public hearing dates and public comment period: 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.
December 1, 2020 and December 10, 2020	Public Hearings held. Due to the ongoing COVID-19 pandemic, public hearings held virtually using Zoom. Minutes of public hearings and summary of public comments received included in this Appendix.
December 23, 2020	Close of public comment period.
February 9, 2021	Presentation to HACSB Board of Commissioners for approval. Resolution included in Appendix A.

NOTICE OF PUBLIC HEARING

On March 14, 2008, the U.S. Department of Housing and Urban Development (HUD) executed a ten-year 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, Amendment 1. The Plan will be made available to the public for review for 30 days starting Monday, November 23, 2020, on HACSB's website at <https://hacsb.com/moving-to-work/>.

Notice is hereby given that HACSB will conduct two public hearings regarding the proposed Plan on Tuesday, December 1, 2020 at 10:00 a.m. and Thursday, December 10, 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.

Tuesday, December 1, 2020, at 10:00 a.m. (PDT)

To join online:

- **Go to:** <https://us02web.zoom.us/j/89247016108>
- **Enter Meeting ID:** 892 4701 6108

To join by phone:

- **Dial:** 1-669-900-6833
- **Enter meeting ID:** 892 4701 6108

Thursday, December 10, 2020, at 2:00 p.m. (PDT)

To join online:

- **Go to:** <https://us02web.zoom.us/j/82688433794>
- **Enter meeting ID:** 826 8843 3794

To join by phone:

- **Dial:** 1-669-900-6833
- **Enter meeting ID:** 826 8843 3794

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 December 23, 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
DECEMBER 1 AND DECEMBER 10, 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 April 24, 2019. 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 Tuesday, December 1, 2020, the public hearing convened at 10:00 a.m., with Nicole Beydler, Senior Management Analyst, presiding. No members of the public attended and no public comments were received. The public hearing ended at approximately 10:20 a.m.

On Thursday, December 10, 2020, the public hearing convened at 2:00 p.m., with Nicole Beydler, Senior Management Analyst, presiding. No members of the public attended and no public comments were received. The public hearing ended at approximately 2:20 p.m.

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 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.

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)

DISCLOSURE OF LOBBYING ACTIVITIES

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

(See reverse for public burden disclosure.)

Approved by OMB

0348-0046

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

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Applicant Name

Housing Authority of the County of San Bernardino

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.

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

Name of Authorized Official

Maria Razo

Title

Executive Director

Signature



Date (mm/dd/yyyy)

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

AMP 206					
Development	City	Units	Budget	Plan Year	Activities

* note: balance of units in AMP 206 have completed RAD conversion as of 4/2016

Total- AMP 206

-

AMP 207					
Development	City	Units	Budget	Plan Year	Activities

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

Total- AMP 207

-

AMP 208					
Development	City	Units	Budget	Plan Year	Activities

Cal 19-32, 19-42	High Desert	6	-		Section 32 homes being sold
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Total- AMP 208

-

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: Summary					
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:		FFY of Grant: FFY of Grant Approval:	
Type of Grant <div style="display: flex; justify-content: space-between;"> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision No:) </div> <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report </div>					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁽¹⁾	
		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: Summary					
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:		FFY of Grant: FFY of Grant Approval:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision No:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁽¹⁾	
		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

Part I: Summary					
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:		FFY of Grant: FFY of Grant Approval:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision No:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ⁽¹⁾	
		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 Measures				

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:		Grant Type and Number				Federal FFY of Grant:		
Housing Authority of the County of San Bernardino		Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. CFFP(Yes/No):						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost ⁽²⁾		Status of Work
				Original	Revised ⁽¹⁾	Funds Obligated	Funds Expended	
Not associated with any specific development	Assignment of Funds to MTW BLI (MTW (1492)) Description : Assignment of Funds to MTW 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

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

(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

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 child care, 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 ensure 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

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 charts 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

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 through 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

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.

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.

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.
- ***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.

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			
PROPERTY NAME	CITY	UNITS	ENTITY
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	

Appendix I: RAD Significant Amendment

The following items related to the planned RAD conversion of a PHA property are required to be submitted via a RAD Significant Amendment to the MTW Plan, and are included in this plan as follows:

1. A description of the units to be converted. The description should include the following:
 - a. The number of units;
 - b. The bedroom distribution of units, and
 - c. The type of units (e.g., family, elderly/disabled, or elderly-only);

These items are included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

2. Any change in the number of units that is proposed as part of the conversion, including:
 - a. De minimis unit reductions and
 - b. Unit reductions that are exempt from the de minimis cap;
 - c. Any change in the bedroom distribution of units that is proposed as part of the conversion;

These items are included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

3. Changes in the policies that govern eligibility, admission, selection, and occupancy of units at the project after it has been converted.
 - a. If Converting to PBV: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.6, Attachment 1B of this Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice - Notice H 2016-17, PIH 2016-17 (HA) . (See Table 1 below for more specific guidance).
 - b. If Converting to PBRA: This includes any waiting list preferences that will be adopted for the Covered Project as well as the Resident Rights and Participation, Tenant Protections for residents stated in Section 1.7 and Attachment 1B of this Notice and RAD Fair Housing, Civil Rights, and Relocation Notice - Notice H 2016-17, PIH 2016- 17 (HA) . (see Table 1 below for more specific guidance).

These items are included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

4. If there will be a transfer of assistance at the time of conversion, the significant amendment must include:
- a. The location to where the assistance is being transferred
 - b. The number of units to be transferred;
 - c. The bedroom distribution of the units in the new building(s), and
 - d. The type of units, if changed (e.g., family, elderly/disabled, or elderly-only); and
 - e. Any reduction or change in the number of units and what reduction category they fall under (i.e. de minimis)
 - f. How the waiting list will be transferred and how households will be selected for the transfer, where applicable (please see Table 2 below for more specific guidance).
 - g. What the PHA plans to do with the original site following the transfer of assistance, consistent with allowable uses described in Section 1.4.A.12.

These items are included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

5. An indication of whether the PHA is currently under a voluntary compliance agreement, consent order or consent decree or final judicial ruling or administrative ruling or decision and an assurance that compliance will not be negatively impacted by conversion activities.

This item is included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

6. A statement that meets the requirements of Section 5.2 of the RAD Fair Housing, Civil Rights, and Relocation Notice (Notice H 2016-17/PIH 2016-17 (HA)) certifying that the RAD conversion complies with all applicable site selection and neighborhood reviews and that all appropriate procedures have been followed.

7. All other required information and certifications necessary to submit a Significant Amendment to the PHA Plan, including Resident Advisory Board comments and responses, challenged elements, and all required certifications.

8. For MTW PHAs augmenting the RAD rents using voucher reserves as described in Section 1.6 or 1.7, as applicable, a statement explaining how the PHA will be able to maintain continued service level requirements. Additionally, in accordance with 24 CFR Part 903, during the PHA Plan submission and/or significant amendment stage, a PHA shall notify the public that the current and future Capital Fund Program Grants Budgets will be reduced as a result of any projects converting to RAD.

- a. The PHA should provide an estimate of the amount of the current Capital Fund grant that is associated with the proposed project(s) and the impact on the PHA's current Five-Year PHA Plan and Five-Year Capital Fund Action Plan.
- b. If the RAD conversion will impact an existing CFFP or EPC, or it proposes to utilize RHF funds to facilitate conversion, the PHA should also indicate the estimated impact of those activities.

Finally, to avoid the need for a possible subsequent significant amendment, the PHA should examine its definition of "Substantial Deviation". The PHA may want to redefine its definition of Substantial Deviation in Section 10 of the PHA Plan to exclude the following items:

1. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
2. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
3. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
4. Changes to the financing structure for each approved RAD conversion.

The definition of "Substantial Deviation" is included in the RAD Conversion Plan included as Exhibit 1 to this Plan.

Appendix J: 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.



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 as 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 K: 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
28	Moving On	Expanding Housing Opportunities	FY 2021	Proposed