

PHA Name : Housing Authority Of The City Of Santa Barbara

PHA Code : CA076

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 4/1/2023

PHA Program Type: Housing Choice Voucher (HCV) only

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of the City of Santa Barbara (HACSB) has maintained a long-standing goal of being designated a Moving to Work (MTW) agency and is thrilled to begin implementing of various MTW activities at the onset of its 2023/2024 fiscal year.

Prior to MTW designation, HACSB utilized all available resources, however limited, and implemented innovative landlord programs and incentives aimed at increasing landlord participation in the Section 8 program. The fiscal flexibility allowed by Moving to Work will allow HACSB to further collaborate with landlords and property owners to create Section 8 program enhancements to enhance landlord and property owner participation and retention in the program. The Year One is goal being to increasing housing choice for Section 8 Housing Choice Voucher recipients.

HACSB will focus Year One MTW implementation on monetary incentives and on-going educational opportunities for property owners and managers. Signing bonuses, vacancy payments, mitigation funds, education legal workshops, increased program marketing and a constant focus on providing great customer service will be the focus of year one. Despite limited inventory and high rents, increased monetary incentives will increase owner participation and housing choices for program participants.

HACSB will also implement modifications to medical, disability and dependent allowances to reduce cost and administrative burden. Verifying on-going medical expenses for eligible households is a very time-consuming process. HACSB will eliminate this practice and in turn will apply an increased standardized deduction, to significantly reduce staffing time and associated costs. In addition, the increase deductions will result in reduced tenant rent portions.

Throughout year-one HACSB will continue to engage with all stakeholders to evaluate and create additional incentives and program modifications.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
b. Tiered Rent (HCV)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
u. Standard Deductions (HCV)	Plan to Implement in the Submission Year
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Plan to Implement in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented

c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented
c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Housing Authority Of The City Of Santa Barbara Plans to Implement in the Submission Year or Is Currently Implementing

<p>1.n. - Utility Reimbursements (HCV)</p> <p>HACSB will eliminate the utility allowance reimbursement payments to households. Utility allowance reimbursements were issued infrequently and often reimbursement checks would go uncashed. To reduce cost and the administrative burden of issuing these payments, HACSB will eliminate this practice.</p> <p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness</p> <p>This MTW activity has the following cost implications:</p> <p>Decreased expenditures</p> <p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p> <p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Initial implementation.</p> <p>No hardship were requested in the most recent fiscal year.</p> <p>In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p>

Denied hardship requests

There is\are hardship requests pending.

1.u. - Standard Deductions (HCV)

HACSB will implement a larger standard deduction for elderly and disabled families. This will reduce administrative burden and cost and be a benefit for eligible families.

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

This MTW activity applies to the following housing choice voucher unit types: This activity applies to all HCV tenant-based vouchers as well as properties with project-based voucher where the family qualifies as an elderly or disabled family.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

New activity.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

1,000 will be the single standard deduction in the Fiscal Year

2.b. - Payment Standards- Fair Market Rents (HCV)

HACSB will adopt a payment standard that is between 80-120% of the Fair Market Rents (FMR). Payment standards will be reviewed on an annual basis when the new FMR is published, and at other times as determined necessary. The ability to set payment standards within this increased range will allow for payment standards to be more reflective of local markets and therefore increase the number of housing units that HCV participants qualify to rent.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

New activity.

No hardship were requested in the most recent fiscal year.**In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency**

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

Following will explain the payment standards by FMR:

HACSB will adopt a payment standard that is between 80-120% of the Fair Market Rents. Payment standards will be reviewed on an annual basis when the new FMR is published, and at other times as determined necessary. HACSB will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Funding Availability: The PHA will review the budget to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. The PHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, the PHA will consider increasing the payment standard. In evaluating rent burdens, the PHA will not include families renting a larger unit than their family unit size.

Quality of Units Selected: The PHA will review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

Changes in Rent to Owner: The PHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases/decreases by bedroom size.

Unit Availability: The PHA will review the availability of units for each unit size, particularly in areas with low concentrations of low-income families.

Lease-up Time and Success Rate: The PHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)
HACSB will pay vacancy loss when a unit assisted under the HCV program is re-rented through the Section 8 program. Vacancy loss will be paid for a maximum of 30-days/1 full month. Payment will be sent to Landlord once the HAP contract has been executed. All efforts made to lease a unit, including but not limited to, advertisements, notification to HACSB of an available unit, turnover timeline with workorders or invoices, will be required when deciding as to number of vacancy days paid. Vacancy loss will only be paid when the new tenant is a Section 8 assisted as was the immediate prior tenancy.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity has the following cost implications: Increased expenditures
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies to all family types
The MTW activity applies to all tenant-based units
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. New activity.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to Certain types of units only
The types of units policy applies to: Other Does not apply to PHA owned, LIHTC units, units with regulatory agreements or Project-Based Voucher units
Maximum payment to the landlord is

\$30-day of rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

4.b. - Damage Claims (HCV-Tenant-based Assistance)

Damage mitigation funds can be used to pay a landlord for tenant-caused damages beyond normal wear and tear, unpaid rent, and related court costs more than the tenant's security deposit. Allowing for damage mitigation funds will increase landlord retention and increase housing inventory.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies to all family types

This MTW activity applies to the following housing choice voucher unit types: Does not apply to PHA owned units, LIHTC units, units with regulatory agreements, or to Project-Based Voucher units.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

New Activity.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to

To all units

The types of units policy applies to:

Maximum payment to the landlord is \$2 months of contract rent..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
<p>a) New Landlord Bonus: HASCBS will pay an incentive of up to \$1000 for new HCV participating landlords.</p> <p>b) Referral bonus: A \$250 monetary incentive to any person referring a new landlord to the HASCBS's HCV program which results in the lease up of a Section 8 participant. Section 8 participants would not be eligible.</p> <p>c) Legal Information Sessions: One of the barriers HASCBS has discovered exists with landlords unwilling to participate in the HCV program is fear of not providing proper legal documentation. HASCBS will provide periodic legal information sessions lead by a local attorney. This activity gives landlords more confidence in working with a HUD funded program.</p> <p>d) Apartment Repair Program: HASCBS can provide loans to landlords to help pay for repairs to quickly bring a unit up to HQS standards. The loan would then be repaid over a period of 6 or 12 months with automatic deductions from HAP payments. Loan amounts will be granted up to \$2,500 with a quote from a qualified contractor or itemized estimate from the landlord.</p> <p>e) Subsidized Membership to Santa Barbara Rental Property Association (SBRPA): HASCBS will pay a portion of the initial fees for the first year of membership for participating landlords for SBRPA fees. Landlords will gain access to SBRPA legal documents, information on new and existing tenant laws and an attorney. This access makes for generally better-informed landlords who follow rules and regulations and need less guidance from agency staff which ultimately is less of a financial and resource drain on the agency.</p> <p>f) Marketing: While marketing is not a landlord incentive, having an HCV program that is not marketed well will result in limited success. HASCBS has been able to create a positive image about the agency as a whole and has been successful in marketing to landlords directly by advertising in local magazines and newspapers, using social media, sending out newsletters and by creating audio and visual public service (PSA) announcements.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Cost effectiveness;Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Increased expenditures</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>This MTW activity applies to:</p> <p>New admissions and currently assisted households</p>
<p>An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).</p> <p>The MTW activity applies to all family types</p>
<p>This MTW activity applies to the following housing choice voucher unit types: Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p>

New activities.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.
This policy applies to Certain types of units only (Display selected and additional Pop up is complex logic.)
The types of units policy applies to: Other New Landlord Bonus, Referral Bonus, Apartment Repair Program and Returning Landlord incentives do not apply to PHA owned units, LIHTC units, units with regulatory agreements, or Project-Based Voucher units.
Maximum payment to the landlord is \$Lessor of 1-month's rent or \$1,000. Repayable loans up to \$2,500..
0 payments were issued under this policy y in the most recently completed PHA fiscal year.
\$0 issued under this policy in the most recently completed PHA fiscal year.

5.a. - Pre-Qualifying Unit Inspections (HCV)
Initial inspections of units can be conducted up to 90 days prior to unit lease-up to help incentivize landlords to participate in the program and avoid delays in leasing. Participants or landlords can request a special (interim) inspection at any time.
This MTW activity serves the following statutory objectives: Housing choice
This MTW activity has the following cost implications: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. New Activity
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency Received 0 hardship requests

<p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>The pre-inspection is valid for</p> <p>90 days.</p>

<p>9.a. - Increase PBV Program Cap (HCV)</p>
<p>There is a large community need for long term affordable housing. HCV units experience annual rent increases which result in increased tenant rental portions. By project-basing additional vouchers, long-term and affordable housing is secured for families.</p> <p>This activity would increase the cap for which the HACSB could award Project-Based Voucher contracts. HACSB has very few project-based units a left to authorize and there is an increased need within the housing inventory.</p>
<p>This MTW activity serves the following statutory objectives:</p> <p>Housing choice</p>
<p>This MTW activity has the following cost implications:</p> <p>Neutral (no cost implications)</p>
<p>An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>New activity</p>
<p>No hardship were requested in the most recent fiscal year.</p>
<p>In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency</p> <p>Received 0 hardship requests</p> <p>Approved hardship requests</p> <p>Denied hardship requests</p> <p>There is\are hardship requests pending.</p>
<p>50.00% of total authorized HCV units will be authorized for project-basing.</p>

<p>9.b. - Increase PBV Project Cap (HCV)</p>
<p>Allows more than the greater of 25 units or 25% of the units at a complex to receive Project-Based Voucher assistance. HACSB will implement this activity to allow a project cap of up to 100% of the units at a project. This will allow for additional housing choice for all Section 8 eligible households.</p>
<p>This MTW activity serves the following statutory objectives:</p>

Housing choice
This MTW activity has the following cost implications: Neutral (no cost implications)
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. New activity.
No hardship were requested in the most recent fiscal year.
In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency Received 0 hardship requests Approved hardship requests Denied hardship requests There is\are hardship requests pending.

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)
HACSB will be allowed to award project-based voucher units to properties owned by HACSB, or a single-asset entity of HACSB without engaging in a competitive selection process. HACSB must currently engage in an administratively burdensome process to project-based units that begins with publishing a Request for Proposals (RFP) to solicit applications for any interested property owner. This activity would provide flexibility to award PBV vouchers to HACSB owned units with a simplified process of having a Subsidy Layering Review conducted and ensuring the property is compliant with site selection requirements.
This MTW activity serves the following statutory objectives: Cost effectiveness;Housing choice
An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. The MTW activity applies only to a subset or subsets of assisted households
This MTW activity applies to: New admissions and currently assisted households
An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other). The MTW activity applies to all family types
This MTW activity applies to the following housing choice voucher unit types: Applies only to units owned by a single-asset entity of HACSB.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

New activity.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Santa Barbara MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

D.	Safe Harbor Waivers.
D.1	Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested.
E.2	Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.
G.1	<p>75% Very Low Income – Local, Non-Traditional.</p> <p>HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.</p>
Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	
49%-30% Area Median Income	
Below 30% Area Median Income	
Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
<p>MTW agency did not established a rent reform policy to encourage employment and self-sufficiency HACSB is exploring options for implementing alternative reexamination schedules to a triennial reexamination schedule. Review of required interim reporting for income increases is also being reviewed for possible future implementation. HACSB staff is looking to implement once a software conversion is completed, and additional stakeholder input is solicited.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	# of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
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To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
No known evaluations.	

Hardship Policy

Reasons for Financial Hardship

A financial hardship for a change in payment standards is only for families where a payment standard would decrease in an established unit (not at unit transfers or issuance of vouchers), where the family has experienced a decrease in income because of changed circumstances.

HACSB Policy

A decrease in income because of changed circumstances includes.

Family income has decreased because of the loss of employment.

A death has occurred in the family.

Reduction in or loss of earnings or other assistance; and

Changed circumstances, for medical costs, childcare, transportation, education, or similar items.

Death in the family

HACSB Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

Implementation of Hardship Exemption

Determination of Hardship

If a request for hardship is received HACSB will suspend the activity for the household, beginning the first day of the month following the date of the request. The activity will remain suspended until a determination has made as to whether the request is warranted.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

HACSB Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

If the request is approved the request will remain in effect until the next income reexamination. At which time the hardship will be reevaluated.

A hardship exemption may be considered if a household can demonstrate that they would not be able to pay the rent due to the payment standard.

The hardship exemptions would expire at a household's next regular income reexamination, or when the household is able to resume paying rent using the reduced payment standard.

HACSB Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the standard deduction and require the family to repay the amounts suspended.

HACSB Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA will calculate medical or disability related expenses and include all expenses that exceed 20% of a household's income. This TTP will be for a 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of rent as calculated with the standard deduction and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

HACSB Policy

The PHA will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of its Administrative Plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA will calculate all reported on-going medical and disability related expenses and apply an allowance for each dollar that exceeds 20% of a household income. The exemption will apply from the first of the month following the family's request until the next income reexamination, at which time the hardship will be reevaluated. When the financial hardship has been determined to be long-term, the family is not required to repay any HAP.

Grievance

If a hardship request is denied a family may submit a written request for a second review by the Director of Housing Programs or designee.

1.u. Standard Deductions

1. Replacing itemized medical deductions with a standard deduction of \$1,000 per eligible elderly or disabled household will result in approximately \$30,000 of increased Housing Assistance Payments per year. This cost translates to \$15 average reduced monthly total tenant payment.
2. This change will benefit eligible households with a decrease in monthly rent portion.
3. The change will have no impact the wait time on any agency waitlists.
4. The change will have no impact on the termination rate of families form the program.
5. The change will have no impact on the HCV utilization rate.
6. The change will result in much reduced staff time spent in the collection and verification of reported medical expenses. Annual reexaminations for households with reported out of pocket medical expenses can result in an additional hour to five-hours of staff time. Replacing itemized deductions with a larger standard deduction meets the MTW goal of cost effectiveness as staff time, photocopy costs and postage costs are all reduced.
7. A hardship policy has been adopted. As this is a new MTW activity the Housing Authority will monitor hardship requests and track the number received and the outcome of the requests.
8. This policy change will be a positive change for both elderly and disabled families.

Impact Analysis – 2.b. Payment Standards (HCV)

- 1: Exact impact is difficult to predict as there are many economic factors that dictate market performance, however, HACSB believes that the impact will be neutral or result in decrease revenue. HACSB has historically sought HUD approval for exception to adopt payment standards above 110% of Fair Market Rent. The application package to these requests has required many hours of staff time as well as costs to higher a firm to conduct elaborate market analysis.
2. Based on historical data HACSB would adopt payment standards between 110-120% annually. As a result the change will benefit eligible households with a decrease in monthly rent portion.
3. The change will have no impact the wait time on any agency waitlists.
4. The change will have little impact on the termination rate of families form the program. The change would possibly lower the number of families losing assistance due to the rule of termination of assistance after 180 days of zero HAP payment.
5. Increased payment standards would incentivize landlords to rent new units to voucher participants as they would be able to rent at higher contract rents, so it would increase utilization rate.
6. This activity would increase housing choice and be cost effective. Less staff time and cost obtaining approval for adequate payment standards would be coupled with larger housing inventory as a result of landlord receiving approval of proposed contract rents.
7. MTW statutory requirements:
 - a) Very Low-Income Requirement: This activity will not impact HACSB's ability to to meet this requirement as there is no link to applicant waitlist selection.
 - b) Reasonable Rent Policy: This activity does not affect process for rent calculations. An increased payment standard, however, would decrease the family's share of rent to owner in many cases.
 - c) Substantially the Same Requirement: HACSB does not anticipate an increase in HAP expenditures due to these activities, however, HACSB will continue to ensure adequate HAP dollars are available to continue to assist the same number of families.
 - d) Comparable Mix Requirement: This activity would have no effect on the number of household members in families, nor unit size rented.
 - e) Housing Quality Standards (HQS): Units would continue to have to meet the HQS standards, so this statutory requirement will be met.
8. Hardship requests are not anticipated as the participants will receive an increased benefit in increased HAP and reduced tenant portion of rent.
9. Payment standards for all bedroom sizes would be increased equitably based on market data to avoid a disparate impact to any protected class.

Public Comment:

The Housing Authority City of Santa Barbara (HACSB) held public meetings on the following dates:

August 24, 2022- Meeting recording subsequently posted online

Questions regarding whether there is a work requirement with the MTW status

August 25, 2022 Meeting recording subsequently posted online

Questions regarding whether there is a work requirement with the MTW status

November 16, 2022-Resident Advisory Board

No comments related to MTW or Annual Plan.

December 7, 2022-Housing Authority Commission meeting

No public comments related to MTW or Annual Plan.

HACSB also created a designated email address for MTW related comments and questions, ran various newspaper advertisements and sent out mass mailings and emails to program participants and the landlord community announcing the public meetings.

MTW CERTIFICATIONS OF COMPLIANCE***U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING*****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (04/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the City of Santa Barbara

CA076

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).

Lucille Boss

Chair, Housing Authority of the City of Santa Barbara Commission

NAME OF AUTHORIZED OFFICIAL

TITLE



Lucille Boss (Dec 8, 2022 08:52 PST)

Dec 8, 2022
December 8, 2022

SIGNATURE

DATE

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