

# PHA Name : Housing Authority Of The City Of Santa Barbara

**PHA Code :** CA076

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 4/1/2024

**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 a vision of a community where families and individuals have access to affordable housing and pathways to self-sufficiency. The Moving to Work (MTW) designation allows for the flexibility for HACSB to tailor its Section 8 program to meet the needs of the community to see that vision come to fruition. The fiscal flexibility allowed by Moving to Work will continue to allow HACSB to collaborate with landlords and property owners to create Section 8 program enhancements to increase landlord and property owner participation and retention in the Section 8 program. By doing so, housing choice for the populations served increases.

Increasing housing opportunity through the implementation of landlord incentives directly aligns with both HACSB and HUDs goal of deconcentrating poverty and providing more opportunity for households especially those households which are families with children.

The focus on extensive monetary landlord incentives and on-going educational opportunities for property owners and managers, includes signing bonuses, vacancy payments, mitigation funds, education legal workshops, increased program marketing and a constant focus on providing great customer service. In year one of implementation we saw a successful lease up of Section 8 Voucher clients despite limited inventory and high rents. This was a direct result of the increased monetary incentives; the agencies focus on being a great partner and providing great customer service.

HACSB will continue to evaluate its' existing landlord incentives over the next year but will also review allowable waivers to implement in the coming years.

Throughout year-one HACSB will continue to engage with all stockholders 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).**

<b>1. Tenant Rent Policies</b>	
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)	Currently Implementing
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)	Currently Implementing
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Currently Implementing
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
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
<b>6. Short-Term Assistance</b>	
<b>7. Term-Limited Assistance</b>	
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	
Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
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
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
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
<b>11. MTW Self-Sufficiency Program</b>	
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
<b>14. Moving on Policy</b>	
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
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
<b>17. Local, Non-Traditional Activities</b>	
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**

<b>1.n. - Utility Reimbursements (HCV)</b>
<b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b> HACSB eliminated the utility allowance reimbursement payments to households who have a utility allowance that exceeds the total tenant payment. Utility allowance reimbursements were issued infrequently, and reimbursement checks would often go uncashed. To reduce cost and the administrative burden of issuing these payments HACSB will eliminate this practice.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Decreased expenditures
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>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.</b> The elimination of utility allowance reimbursement has reduced the administrative burden of tracking uncashed checks and resulted in decreased expenditures. There were 14 families who have ceased receiving reimbursement checks.

**1.u. - Standard Deductions (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HACSB implemented an increased standard deduction for both its elderly and disabled families as well as an increased allowance for dependents. HACSB replaced itemized medical deductions with a standard deduction of \$1,000 per eligible elderly or disabled household. This resulted in an increase of approximately \$30,000 per year in Housing Assistance Payments per year which translated to a \$15 average reduced monthly total tenant payment.

This change has been cost neutral as the staff hours spent in the collection and verification of reported medical expenses decreased significantly, equating to approximately \$25,000 per year in salary savings. 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.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications); Decreased revenue

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

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

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies only to selected family types

**Please select the family types subject to this MTW activity.**

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

This activity applies to all HCV tenant-based vouchers as well as project-based vouchers 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.**

The vast majority of elderly or disabled households, 85%, saw a \$15 monthly reduction in rent portion.

The change has been cost neutral as the staff hours spent in the collection and verification of reported medical expenses decreased significantly, equating to approximately \$25,000 per year in salary savings, where the increased Housing Assistance Payments annually are approximately \$30,000. It has proven to be cost effective, saving staff time as well as direct office related costs.

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

No

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

Yes

**What considerations led the MTW agency to modify the hardship policy?**

Modifications were made for typos only.

**How many hardship requests have been received associated with this activity in the past year?**

5.00

**How many hardship requests were approved?**

3

**How many hardship requests were denied?**

2

**How many are pending?**

0

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**How much will the single standard deduction be in the Fiscal Year?**

\$1,000

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

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HACSB will adopt a payment standard that is 80-120% of the Fair Market Rents (FMR). Payment standards will be reviewed annually at publication of a new FMR, at periodically thereafter if deemed necessary. Greater agency control of Payment Standards allows for standards that are more reflective of the local jurisdiction and allows for voucher participants to have greater access to available units.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

Published Fair Market Rents for HACSB's local jurisdiction are not reflective of the local market. Currently HACSB has approved payments standards at 110% of FMR and are submitting a reevaluation of FMR request to HUD. Once new FMR's are published HACSB will review and adopt payment standards within our allowable 80-120% range.

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

No

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does the MTW activity require an impact analysis?**

Provided Already

**Please explain the payment standards by FMR:**

HACSB will establish payment standards between 80-120% of the FMR

#### **4.a. - Vacancy Loss (HCV-Tenant-based Assistance)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

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.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

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

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

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.**

The processing of paying vacancy loss has not changed since initial implementation. HACSB has only fulfilled requests for vacancy payments 4 times since implementation. The ability to offer the financial incentive however, garners attention from property owners and in turn allows the conversation about Section 8 and its benefits to begin. Increasing the list of potential financial incentives is a benefit to voucher participants as landlords are more likely to participate when they feel as though they are financially protected.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

Certain types of units only

**What is the maximum payment that can be made to a landlord under this policy?**

\$3,500- or 1-months contract rent whichever is lower.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

4

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$3,202

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

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

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. Payment is made to a landlord only upon the execution of a subsequent HAP contract. The maximum amount payable under damage claims is the lesser of \$3,000 or the actual cost associated with the vacancy turnover of the subsidized unit. Allowing for damage mitigation funds will increase landlord retention and increase housing inventory. All amounts paid would be amounts above and beyond what is covered by a tenants security deposit.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

The damage mitigation funds will continue to the following year unchanged. Much like vacancy payments, money is rarely paid out, however, knowing that it is an available option to property owners, provided them more confidence in leasing units to voucher holders.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

Certain types of units only

**What is the maximum payment that can be made to a landlord under this policy?**

\$3,000. the maximum payment made is the lesser of \$3,000 or the actual cost of vacancy turnover after the tenant security deposit has been applied.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

2

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$4,500

#### **4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

As these activities are implemented to increase landlord participation in the program, units that are required to house voucher holders such as Project-Based Voucher units, ones with a regulatory agreement on the units, Tax Credit units, or ones owned by the Housing Authority are not included in these activity.

This activity allows the HACSB to pay the landlord an incentive to lease up a Housing Choice Voucher (HCV) program participant. The HACSB would offer an array of incentives, but the total incentive paid to one landlord could not exceed

more than one month of the contract rent of the unit and would be paid at the time of HAP execution.

The continuing incentives are:

a) New landlord bonus: HASCBS will pay an incentive of up to \$1000 for new HCV participating landlords.

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.

c) 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 the lesser of \$2,500 or one-months contract rent. A quote from a qualified contractor or itemized estimate from the landlord is required for loan approval.

d) 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. Membership subsidy will be in the amount of \$100 membership initiation fee per landlord paid directly to SBRPA.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

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

**Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?**

New admissions and currently assisted households

**Does the MTW activity apply to all family types or only to selected family types?**

The MTW activity applies to all family types

**Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?**

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

**Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.**

Does not apply to PHA owned, LIHTC units, units with regulatory agreements, or 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.**

There has been significant interest in the Santa Barbara Rental Property Association membership. We will continue this as well as the other listed incentives.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

Certain types of units only

**What is the maximum payment that can be made to a landlord under this policy?**

\$1,000- or 1-month's rent, whichever is less is the maximum for referral or new landlord bonuses. Repayable loans will be the lesser of the actual cost of the service, \$2,500 or one-month's rent. Subsidized Santa Barbara Rental

Property Association membership will be \$100 per landlord.

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

114

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$24,900

#### **5.a. - Pre-Qualifying Unit Inspections (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

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.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

Landlord recruitment continues to improve. Ability to conduct inspections prior to lease-up avoids lease up delays/decreased rental payments to landlords. The ability of the landlord to be able to submit for special inspections also assists with their ability to properly manage and enforce lease and program obligations.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**How long is the pre-inspection valid for?**

The pre-inspection is valid for 90 days.

#### **9.a. - Increase PBV Program Cap (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

There is a large community need for long term affordable housing. While HCV units are a great option for qualified households, project-basing ensures affordability for a much longer duration. HCV clients experience increased rent portions as the result of property owner issued rent increases. PBV households do not absorb owner increases allowing tenant rent portions to remain affordable. By project-basing additional vouchers, long-term and affordable housing is secured for additional members of the community. HACSB will increase its PBV program cap to 50% of its total authorized units, which is the lower of its total authorized units or annual budget authority.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

HACSB has entered into 2 PBV agreements to enter into Housing Assistance Payments Contracts this past year which will create 54 additional affordable housing units.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**What percentage of total authorized HCV units will be authorized for project-basing?**

50.00%

**9.b. - Increase PBV Project Cap (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Allows more than 25 unit or 25% of the units at a particular complex to receive project-based voucher assistance. HACSB implemented this activity to allow for up to 100% of a project to receive voucher assistance. This allows for developers of both small and large projects to attach sufficient project-based voucher to a property to make it financially feasible all while increasing housing opportunities for families. HACSB is subject to Notice PIH 2013-27 where applicable, or any successor notice.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

HACSB has entered into two AHAP's. One for 100% of a property. This will secure affordable housing for 47 units of much needed family housing.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

**9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

HACSB will be allowed to award project-based voucher units to properties owned by 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 provides flexibility to award PBV vouchers to units owned by a single owner entity of HACSB with a simplified process of having a Subsidy Layering Review conducted and ensuring the property is compliant with site selection requirements. Safe Harbor for this activity requires HACSB to complete a subsidy layering review, complete site selection requirements, and all HQS and rent reasonable determinations will be required to be performed by an independent entity. Properties must be owned by a single-asset entity of HACSB and HACSB is subject to Notice PIH 2013-27 where applicable, or any successor notice.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness; Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.**

The flexibilities of this waiver have not yet been realized. HACSB has not yet sought to project-base units owned by HACSB or a single-asset entity of HACSB.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

No

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>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, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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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<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> 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.	
	<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	<b>0</b>

\*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.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> Yes	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # 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.	0 # 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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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
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.	

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

<b>H.</b>	<b>Public Comment</b>
	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.

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.

**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 (04/01/2024), 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).*

Rob L. Fredericks

Secretary

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

  
Rob L. Fredericks (Jan 19, 2024 11:30 PST)

Jan 19, 2024

**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.*

## **Hardship Policy**

### **Reasons for Financial Hardship**

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

#### HACSB Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the established rent, and only if there is another source of income from which the family is paying for ongoing medical expenses.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.
- (4) A death has occurred 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).

- (5) The family has experienced an increase in on-going out of pocket medical or disability related expenses circumstances that exceed 20% of the household'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.

The financial hardship exemption applies only to families who qualify as elderly or disabled families and report recurring out of pocket medical expenses. Likewise, the family must report an ongoing source of income from which the reported out of pocket medical expenses are paid. An elderly or disabled family with zero income is not eligible for a hardship exemption.

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

The hardship provision would require HACSB to recalculate household income by deducting the amount of health and medical expenses that exceed 20% of household income.

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 regular income calculation

#### 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.

### **Impact Analysis 1.u. Standard Deductions**

1. Replacing itemized medical deductions with a standard deduction of \$1,000 per eligible elderly or disabled household has resulted 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 benefits eligible households with a decrease in monthly rent portion.
3. The change has no impact the wait time on any agency waitlists.
4. The change has no impact on the termination rate of families form the program.
5. The change has no impact on the HCV utilization rate.
6. The change has resulted in 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 have been reduced by approximately \$25,000 per year.
7. MTW statutory requirements:
  - a) Very Low-Income Requirement: This activity will not impact HACSB's ability to meet this requirement as there is no link to applicant waitlist selection.
  - b) Reasonable Rent Policy: This activity does not affect the process for rent calculations. An increased standard deduction, however, would decrease 85% of an eligible households' share of rent to owner.
  - c) Substantially the Same Requirement: HACSB does not anticipate an increase in HAP expenditures due to this activity, 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 most elderly or disabled participant families will receive an increased benefit in the reduced tenant portion of rent.
8. A hardship policy has been adopted. The Housing Authority has received 5 hardship requests and has approved 3 of them.
9. This policy change will be a positive change for both elderly and disabled families and will have no disparate impact on these classes.

## **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.

Public Comment:

The Housing Authority of the City of Santa Barbara (HACSB) held the following public meetings and solicited feedback the following ways:

September 14, 2023 Public Comment was solicited from the local Landlord Community during an in-person landlord information session.

No comments related to MTW received.

October-December 2023 Public Comment was solicited through Public Comment notices online and through local publications.

No comments related to MTW were received

Nov. 8, 2023: Resident Advisory Board and Family Self Sufficiency Families were invited to review HACSB's Annual Plan and MTW Supplement.

Only resident Advisory Board members attended, and no comments related to MTW were received.

Agency established MTW designated email address received only 1 email which was a Section 8 waitlist inquiry and not related to MTW.