



Moving to Work (MTW) FY2020 Annual Plan

Housing Authorities of the County of Santa Clara & City of San José

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Moving to Work FY2020 Annual Plan

SANTA CLARA COUNTY HOUSING AUTHORITY (SCCHA)

(Housing Authorities of the County of Santa Clara & The City of San José)

SCCHA's mission is to provide and inspire affordable housing solutions to enable low-income people in Santa Clara County to achieve financial stability and self-reliance.

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I. Introduction

Purpose of this Plan

In 1967, the Santa Clara County Board of Supervisors established the Santa Clara County Housing Authority of the County of Santa Clara (SCCHA). SCCHA has an agreement with the City of San José to administer and manage the Housing Authority of the City of San José (HACSJ)'s Housing Choice Voucher program. This MTW Plan presents a consolidated strategy to be implemented for both the County and City programs.

In 2008, SCCHA entered into a 10-year agreement (which has been extended until the conclusion of Fiscal Year 2028) with the Department of Housing and Urban Development (HUD) to become a Moving to Work (MTW) agency. This MTW Annual Plan illustrates how SCCHA proposes to carry out the MTW program in Fiscal Year 2020 (FY2020) from July 1, 2019 through June 30, 2020. The MTW Plan is an annual requirement by HUD and systematically describes how each activity advances SCCHA's vision and goals within the framework of the MTW charter.

What is MTW?

Established by Congress in 1996, MTW is a Federal demonstration program that links broad Federal goals with locally-designed initiatives. MTW encourages select housing authorities to propose and, upon HUD approval, implement innovative changes to the way affordable housing programs are administered to meet at least one of the following three broad Federal goals:

1. Decrease administrative costs and increase cost effectiveness in housing program operations;
2. Promote participants' economic self-sufficiency, and
3. Expand participants' housing choices.

MTW requires SCCHA to strive for these goals while ensuring that the Agency continues to serve substantially the same mix of tenants (in terms of income level and family size) and at least as many households as the Agency had before its MTW status.

SCCHA's Vision and Goals

In FY2014, SCCHA developed a five-year Strategic Plan to guide the Agency's direction over the long range. The Strategic Plan affirmed SCCHA's mission to provide and inspire affordable housing solutions that enable low-income people in Santa Clara County to achieve financial stability and self-reliance, identified the Agency's core values, and established SCCHA's short-term and long-term goals built upon MTW objectives.

SCCHA is currently in the process of updating its Strategic Plan as it nears its five-year expiration date in FY2019. The updated plan will promote informed decision-making about how to achieve overall objectives in support of the agency's mission, rather than fixed action items with changing priorities depending on external factors that impact our business operations. The plan will

provide a framework for learning to support informed decision-making toward established objectives, as well as ongoing observation and adaptation.

SCCHA will continue to use the Strategic Plan as a compass, pursuing strategies within FY2020 and beyond that will set the foundation for the Agency to fulfill its MTW and non-MTW long-term goals.

SCCHA's Short-Term Goals and Proposed MTW Activities for Fiscal Year 2020

SCCHA is currently developing for implementation in FY2020, a continuously open interest list for low-income individuals and families interested in receiving Section 8 assistance. The interest list will provide ongoing opportunity and hope to applicants seeking a voucher through its open registration and ongoing ability to update and view their registration. From the interest list, the agency will pull smaller, randomly sorted batches of applicants when vouchers become available. SCCHA will not pull applicants from its interest list until its' 2006 Section 8 waiting list is exhausted.

The open interest list requires the Housing Authority to move from a paper-oriented registration process to a web-based platform or online portal, accessible via the agency's website and through a newly developed mobile application for use with smart phones. This buildable tool provides applicants with convenience and instant information relative to their status on the list and the process for potentially receiving a voucher.

Site-based waiting lists for all of the Housing Authority's Project-Based Voucher (PBV) and Moderate Rehabilitation program properties will also be included in the development of this online interest list. Each PBV property will provide some basic information about the property's location and amenities and applicants will be able to register on any or all of the site-based lists.

As vacancy rates continue to remain very low in Santa Clara County, SCCHA will closely monitor housing success rates for families 'shopping' for new homes with Housing Choice Vouchers and provide housing search assistance if a family is unable to find a new home within the first 120 days of their shopping voucher.

Santa Clara County is in the midst of a well-publicized affordable housing crisis. The community's recognition of the need for more affordable housing was demonstrated by the overwhelming voter approval of \$950 million in Measure A bond funds for affordable housing development, the bulk of which will be directed to extremely low-income households and permanent supportive housing.

Attaching Project Based Vouchers (PBVs) to projects receiving Measure A development funds ensures that units will be affordable for the County's vulnerable populations, and that new construction properties will have enough long-lasting operating revenue. SCCHA is committed to making available as many additional PBVs in support of Measure A as HUD regulations and funding availability allow. By the end of FY2019, SCCHA will have awarded or conditionally

awarded 352 PBVs and 80 HUD-VASH PBVs (in conjunction with the Veterans Affairs Palo Alto Health Care System) to Measure A projects. Construction of Measure A projects has already begun, with the first expected to lease up in May 2019.

SCCHA's housing development partners provide hope for the future by actively creating new housing dedicated to alleviating homelessness. Many of these developments have been awarded Measure A funds. New affordable housing projects are currently under construction from Morgan Hill and Gilroy in southern Santa Clara County to San José in the central county to Cupertino and Mountain View in northern Santa Clara County. Several properties will be leasing up within FY2020:

- Villas on the Park will be a Permanent Supportive Housing project in downtown San José, opening in October 2019 with 83 PBVs for the chronically homeless. Villas on the Park was developed with funding made possible through Santa Clara County's Measure 'A' housing referendum, which targeted almost \$1 Billion in bonds for the development of affordable housing in the county.
- Renascent Park is another Permanent Supportive Housing project in San José that has been awarded 160 PBVs for the chronically homeless. Construction is expected to be completed and leasing to begin in October 2019.
- In late Calendar Year 2019, the Monterey Gateway and Crossings on Monterey Measure 'A' projects, in Gilroy and Morgan Hill respectively, will both open with PBVs serving chronically homeless seniors as well as the chronically homeless. Monterey Gateway will have 37 PBVs, and Crossings on Monterey will have 20.

In addition to these projects, SCCHA has conditionally awarded PBVs to several other projects under development by its affordable housing partners. These projects are not expected to be completed until FY2021. They include 20 PBVs for a project in Mountain View; 182 PBVs distributed to four projects in San José; 20 PBVs for a project in Milpitas; and 80 PBVs for a project located in Santa Clara, California.

SCCHA's development team is busy developing our own affordable housing. The agency recently acquired 2.3 acres of land on Race Street in San José, utilizing \$12 million in MTW funds. The first of two planned projects at this site is Alvarado Park Senior Housing that includes 89 affordable units targeting seniors. The second is Bellarmino Place Family Housing comprised of 115 affordable units for working families. SCCHA will request MTW funds for development of this project in FY2020. In addition, the Park Avenue senior housing project is under construction with an estimated completion date in early FY2021.

MTW funds in the amount of \$30 million were used to acquire property on East Santa Clara Street. This property will be home to a new office for SCCHA, multi-family affordable housing

units, and open space green areas. Master planning will continue into FY2020 and MTW funds will be used in pursuing entitlements and conducting appropriate environmental reviews.

SCCHA's Human Resources Department and Training and Outreach team continue to facilitate internal trainings focused on professional development (i.e. communication skills, accepting change, project management, etc.) and how to effectively administer the Section 8 program in compliance with HUD regulations. The team also presents monthly Tenant Housing Search Workshops and bi-monthly Section 8 Owner Information Sessions to continually communicate essential program information to major stakeholders. Further, SCCHA's Compliance Team, created in April 2015, consistently and effectively monitors and evaluates the agency's federal programs, ensuring staff and program participant compliance with applicable program rules and regulations.

SCCHA's Information Technology Department is striving to improve the agency's efficiency, and to meet staff's technological needs. The agency introduced a new mobile application for current tenants that will facilitate information requests, submission of documents, and communications with Housing Authority staff. In FY2020, the agency will be developing additional features in the mobile application that will allow applicants to sign up for and manage their information on the new applicant interest list that was highlighted earlier in this section.

To conclude, a continued priority for SCCHA is to ensure that the Housing Choice Voucher (HCV) program operates in an efficient and effective way. To continue to meet that priority, SCCHA proposes ~~five~~ **six** new activities that focus on increasing housing choices for low-income families and increasing cost effectiveness in housing program operations:

- **Proposed Activity 2020-1: Increase Percentage of Project Based Vouchers (PBV).** HUD regulations limit a Housing Authority's number of PBVs to 20% of its total voucher baseline. The percentage limit can be increased to 30% for PBV units for the homeless, persons with disabilities, families with veterans and for units located in low poverty census tracts only. The Housing Authority is proposing to raise the PBV percentage cap for the Housing Authority of the City of San José (HACSJ) and the Santa Clara County Housing Authority (SCCHA) to 40% of the respective baseline number of vouchers and remove the restrictions on the types of allowable units. This proposed activity aligns with the Board's stated objective to develop a strategy to use project-based vouchers to support the County of Santa Clara's Measure A implementation.
(MTW Statutory Objective: Increasing Housing Choices)
- **Proposed Activity 2020-2: Interim Housing.** Interim housing is a potential local, non-traditional MTW activity that aims to provide interim (short-term) rental subsidies for chronically homeless or homeless special needs clients who are referred and approved for a permanent supportive housing PBV unit, but the unit is not yet ready for occupancy. The goal of the interim housing is to move the client from the street into temporary housing (said housing must meet HUD's Housing Quality Standards) until their permanent home is ready. When there are delays between intake/eligibility and move-in to a

permanent supportive housing unit, locating the approved applicants on the street has proved challenging for local homeless outreach teams. A period of stabilization in interim housing is also helpful in preparing the client to maintain their permanent housing and allows intensive case managers to have easy access to their clients once they have been approved for a Section 8 PBV unit. Both the City of San José and Santa Clara County have created or are pursuing similar interim housing solutions and Housing Authority staff are partnering with the City and the County to look for development opportunities to address this situation together.

(MTW Statutory Objective: Increasing Housing Choices)

- **Proposed Activity 2020-3: Over-Housed/Under Housed Project Based Voucher (PBV) Households.** HUD regulations require that a family occupying a PBV unit must not be under- or over-housed (the number of bedrooms in their PBV unit must match the subsidy size of the family). This restriction applies both at the time of move in and any time during the family's occupancy. If a family has changes to its family size during its tenancy in the PBV unit that results in the family becoming over- or under-housed in their current PBV unit, HUD requires they either move to the right size PBV unit or receive a tenant-based voucher and be given a 'reasonable' time to move. The Housing Authority is proposing waiving that requirement (except in the case of an under-housed family violating Housing Quality Standards space standards). This MTW activity will allow the family to remain in place until a 'right sized' PBV unit becomes available or the family voluntarily requests an HCV voucher, whichever comes first. This change will address concerns with forcing PBV families to move during a time of reduced rental housing availability and high rents.

(MTW Statutory Objective: Increasing Housing Choices)

- **Proposed Activity 2020-4: Rent to Owners & Rent Reasonableness.** HUD regulations require that during an assisted tenancy, the rent paid to owner not exceed the reasonable rent as determined by the Public Housing Authority (in comparison with similar units in the current rental market). Occasionally, upon an owner's request for a rent adjustment of a specific amount (which can be done annually), the reasonable rent for the unit according to rental comparisons of similar units will not only not support the increased rent amount the owner is requesting but will be lower than the current approved rent for the unit. In these situations, HUD regulations require that SCCHA reduce the approved contract rent to reflect the current reasonable rent.

This situation is problematic as owners are generally not receptive to a reduction in monthly rent, however small the amount may be. The shortage of available housing, especially affordable housing, coupled with the high-priced rental market in Santa Clara County means that landlords can be more selective in choosing their tenants and are not forced to accept a lower amount of rent to maintain their unit's occupancy.

This activity will allow SCCHA to maintain its affordable housing inventory by honoring owners' current contract rent on their unit despite a rent reasonableness review that supports a slightly lower rent.

(MTW Statutory Objective: Increasing Housing Choices)

- **Proposed Activity 2020-5: Eliminate the 40% of Income Cap at Initial Leasing.** This Activity seeks to waive the 40% of family income cap on an HCV holder's tenant portion of rent. This Activity is being proposed as a technical amendment (bypassing public notice) and is a limited, 1-year initiative in order to address the looming housing insecurity crisis being caused by the 2019-2020 COVID-19 pandemic and the subsequent local and state government orders which closed the majority of businesses in the County. SCCHA will re-propose this Activity with a full public noticing period in the FY2022 Annual Plan, after evaluating the success of the program.
(MTW Statutory Objectives: Increase Housing Choices)
- **Proposed Activity 2020-6: Reduced Frequency of Periodic Inspections.** This Activity seeks to waive the regulatory requirement that leased be inspect at least biennially. All leased MTW units will instead be transitioned to a three-year periodic inspection cycle. Leased units which would previously have been inspected in the next twelve months will have their inspections be delayed for one year or six months after the shelter-in-place orders have been lifted, whichever is later. This Activity is being proposed as a technical amendment (bypassing public notice) and is a limited, 1-year initiative in order to address the looming housing insecurity crisis being caused by the 2019-2020 COVID-19 pandemic and the subsequent local and state government orders which closed the majority of businesses in the County. SCCHA will re-propose this Activity with a full public noticing period in the FY2022 Annual Plan, after evaluating the success of the program.
(MTW Statutory Objectives: Increase Cost Effectiveness)

SCCHA is also re-proposing Activity 2009-1, which reduces the frequency of regular re-examinations to relieve the burden of the 2019-2020 COVID-19 pandemic and the Focus Forward activity to remove an oversight that allows families to the program to exercise portability.

- **Re-Proposed Activity 2009-1: Reduced Frequency of Tenant Re-Examination.** This re-proposed activity seeks to change the frequency of regular tenant re-examinations. The current version of 2009-1 mandates a regular re-examination once every two years for participants with non-fixed income and once every three years for participants with fixed income. The re-proposed 2009-1 will change the frequency to once every three years for participants with non-fixed income and once every four years for participants with fixed income. Participants whose regular re-examinations would previously have been held in the next twelve months will have their re-examinations delayed for one year or six months after the shelter-in-place orders have been lifted, whichever is later. This Activity is being proposed as a technical amendment (bypassing public notice) and is a limited, 1-year initiative in order to address the looming housing insecurity crisis being caused by the 2019-2020 COVID-19 pandemic and the subsequent local and state government orders which closed the majority of businesses in the County. SCCHA will re-propose this Activity with a full public noticing period in the FY2022 Annual Plan, after evaluating the success of the program.
(MTW Statutory Objectives: Increase Cost Effectiveness)

- **Re-Proposed Activity 2014-1b: Focus Forward Part II, Time Limit, Rent Structure & Limited Portability.** SCCHA is re-proposing 2014-1b to waive the provisions of 24 CFR Part 982 relating to portability. Due to the unique nature of the FFP program, the specialized administration of counseling, case management, and escrow account services, and the time-limited housing assistance, portability outside of SCCHA's jurisdiction would not be appropriate in most cases.

SCCHA originally proposed the Focus Forward Program (FFP) as Activity 2014-1 as a modified version of the Family Self Sufficiency program, then amended and separated out elements the FFP in the FY2018 MTW Annual Plan. The case management, escrow account, and economic incentives aspects were consolidated into the re-proposed Activity 2014-1a, and the time-limit of the housing voucher and modified rent structure were re-proposed as Activity 2014-1b.

The current re-proposal of Activity 2014-1b is to incorporate certain restrictions on the mobility and portability of the voucher for a participant in the FFP. Instead of granting outgoing portability requests automatically, SCCHA will implement a review process where requests due to qualified hardships, obtaining full-time employment, or attending an accredited education institution outside the borders of Santa Clara County will be considered.

(MTW Statutory Objective: Family Self-Sufficiency)

Full details of the proposed activities can be found in Section III of this MTW Plan.

SCCHA's Long-Term Vision

SCCHA continues to focus on its vision and core values, as guided by its Strategic Plan. Every six months, SCCHA reports to its Board the progress on the action items and objectives developed from the Agency's Strategic Plan Goals. These updates encourage the agency to re-prioritize or revise the objectives of the Plan as necessary and provide a status report to both internal and external stakeholders on how SCCHA's initiatives align with the Strategic Plan.

SCCHA continues to preserve and improve its affordable housing portfolio and expand the availability of new affordable housing to meet community needs. In addition to using MTW funds where necessary, SCCHA has created a pool of non-federal funds to continue the preservation and rehabilitation of existing SCCHA-managed units. SCCHA will continue to look for other opportunities to invest in new housing opportunities through strategic partnerships within the County.

Overview of SCCHA's MTW Activities

Note: Closed Out Activities 2009-3, 2009-4, 2009-6, 2009-7, 2009-10, 2009-12, 2010-1, 2012-1 and 2015-1 are not shown.

ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	MTW Statutory Objectives		
		REDUCE COST & ACHIEVE GREATER COST EFFECTIVENESS IN FEDERAL EXPENDITURES	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2009-1 (Amended in FY2016)	Reduced Frequency of Tenant Reexaminations	X	X	
2009-2	Expediting the Initial Eligibility Income Verification Process	X		
2009-5	Exploring New Housing Opportunities for the Chronically Homeless			X
2009-8	30-Day Referral Process for Project-based Vacancies	X		
2009-9	Utilization of Low-Income Housing Tax Credit (LIHTC) Tenant Income Certification (TIC) for Income and Asset Verification	X		
2009-11	Project-Base 100 Percent of Units in Family Projects			X
2009-13	Combined Waiting Lists for the County of Santa Clara and the City of San José	X		
2009-14 (amended in FY2014)	Payment Standard Changes Between Regular Reexaminations	X		
2010-2	Excluding Asset Income from Income Calculations for Families with Assets Under \$50,000	X		
2010-3	Applying Current Increased Payment Standards at Interim Reexaminations	X		
2010-4	Allocating Project-Based Vouchers to SCCHA-Owned Projects Without Competition	X		
2010-5**	Assisting Over-Income Families Residing at SCCHA-Owned Project Based Voucher Properties			X
2011-1	Streamlined Approval Process for Exception Payment Standard for Reasonable Accommodation – HCV			X
2011-2	Simplify Requirements Regarding Third- Party Inspections and Rent Services	X		

ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	MTW Statutory Objectives		
		REDUCE COST & ACHIEVE GREATER COST EFFECTIVENESS IN FEDERAL EXPENDITURES	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2012-2	Minimum Two-year Occupancy in Project-Based Unit	X		
2012-3	Create Affordable Housing Acquisition and Development Fund	X		X
2012-4	Create Affordable Housing Preservation Fund for SCCHA- and Affiliate-Owned Properties	X		X
2012-5**	Expand Tenant Services at SCCHA or Affiliate-Owned Affordable Housing Properties		X	
2013-1	Elimination of the Earned Income Disallowance (EID) Calculation	X		
2014-1a*	(Re-Proposed) Focus Forward Pilot Program Part I, Case Management, Incentives and Escrow		X	
2014-1b*	(Re-Proposed) Focus Forward Part II, Time Limit and Rent Structure		X	
2014-2*	Eliminate Requirement to Re-Determine Rent Reasonableness when HUD Decreases Fair Market Rents (FMRs)	X		
2014-3**	Freeze on Contract Rent Increases	X		
2014-4 (amended in FY2015)	Increased Tenant Contribution—Up to 35 Percent of Gross Income	X		
2015-2	Project-Based Voucher Inspection Self-Certification	X		
2016-1*	Restriction on Head of Household Changes		X	
2016-2*	Streamlining of PBV Selection Requirements		X	
2017-1	Phasing in the Subsidy Standard Change	X		
2017-2	Special Needs Population Direct Referral Program			X
2017-3 (amended in FY2018 & FY2019)	Landlord Initiative			X
2017-4*	Setting the Payment Standards Above 110 Percent of HUD Fair Market Rents			X
2018-1*	Strengthening Partnerships through Capacity Building			X
2019-1*	Graduation Bonus		X	

ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	MTW Statutory Objectives		
		REDUCE COST & ACHIEVE GREATER COST EFFECTIVENESS IN FEDERAL EXPENDITURES	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2019-2	Family Self-Sufficiency Program- Waive Contract of Participation Requirements		X	
2019-3	Waiving the Requirement that a PHA Re-Determine Rent Reasonableness for Manufactured Home Spaces Annually	X		
2019-4	Streamlining the Lease-Up Process	X		X

* Activities Not Yet Implemented

** Activities on Hold

II. General SCCHA Operating Information

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
None	0	0	0	0	0	0	0	None	0	0
None	0	0	0	0	0	0	0	None	0	0
None	0	0	0	0	0	0	0	None	0	0

Total Public Housing Units to be Added in the Plan Year

0

* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

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

N/A

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
None	0	N/A
None	0	N/A
None	0	N/A

0

Total Public Housing Units to be Removed in the Plan Year

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Agrihood Senior Apartments	54	No	New construction senior project, consisting of 165 total units. 109 of the units will be affordable, and of those 54 will be supported with PBVs for seniors.
Evans Lane Community Village	30	No	New construction family project, consisting of 61 total units. 30 PBVs will support the project, directed towards those with special needs.
West San Carlos Housing	40	No	New construction family project, consisting of 80 total units. 40 PBVs will support the project, directed towards those with special needs.
Blossom Hill	49	No	New construction senior project, consisting of 147 total units. 49 PBVs will support the project, directed towards seniors with special needs.
Alum Rock Family Housing	29	No	New construction family project, consisting of 87 total units. 29 PBVs will support the project, directed towards the homeless and those with special needs.
202		Planned Total Vouchers to be Newly Project-Based	

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
1701 ECR	16	Leased/Issued	No	14 Studio and 2 1-bedroom units. PBVs are for the chronically homeless and those with special needs.
2275 Ellena Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
2287 Pasetta Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
Anne Way Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Blossom Hill Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Carroll Inn	20	Leased/Issued	No	Family project consisting of 121 Studio units. PBV units are for disabled persons.
Casa De Novo	27	Leased/Issued	No	Family project consisting of 56 units. 27 units provide long-term supportive housing, 29 units operate as a hotel offering temporary supportive housing. PBV units are for chronically homeless families.
Casa Feliz Studios	6	Leased/Issued	No	Family project consisting of 60 studio units. PBV units are for chronically homeless families.
Connell Apartments	5	Leased/Issued	No	Family project consisting of 28 units (1 studio, 17 1-bedroom, and 10 2-bedroom). PBV units (2-Bedroom) are for families.
Corde Terra Senior Apartments	199	Leased/Issued	No	Senior project consisting of 199 1-bedroom units. PBV units are for persons aged 55 years and over.
Corinthian House	6	Leased/Issued	No	Senior project consisting of 102 units (62 studios and 40 1-bedroom). PBV units (1-bedroom) are for persons aged 62 years and over.
Corvin	80	Committed	No	New construction family project consisting of 136 total units. 80 PBVs committed to the chronically homeless.
Country Hills	37	Leased/Issued	No	Family project consisting of 152 units (40 studio, 64 1-bedroom, and 48 2-bedroom). PBV units (8 studio, 16 1-bedroom, and 13 2-Bedroom) are for families.
Crescent Terrace	20	Leased/Issued	No	Senior project consisting of 48 1-bedroom units. PBV units are for persons aged 62 years and over.
Curtner SRO's	6	Leased/Issued	No	Senior project consisting of 6 SRO units. PBV units are for persons aged 62 years and over.
Cypress Gardens Senior Apartments	124	Leased/Issued	No	Senior project consisting of 124 units (111 1-bedroom and 13 2-bedroom). PBV units are for persons aged 55 years and over.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Dent Avenue Apartments	4	Leased/Issued	No	Family project consisting of 24 units (6 studio, 12 1-bedroom, and 5 2-bedroom). PBV units (2 SRO and 2 2-bedroom) are for families.
Donner Lofts – CHDR	20	Leased/Issued	No	Family project consisting of 101 units (92 studio and 9 1-bedroom). PBV units are for chronically homeless families.
Edwina Benner Plaza	23	Leased/Issued	No	Family new construction project consisting of 66 total units. 23 PBVs for families and those with special needs.
Eklund Gardens I Apartments	9	Leased/Issued	No	Family project consisting of 10 2-bedroom units. PBV units are for families.
Eklund Gardens II Apartments	6	Leased/Issued	No	Family project consisting of 6 3-bedroom units. PBV units are for families.
Emerson North	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Emerson South	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Fair Oaks Senior Plaza	93	Leased/Issued	No	Senior project consisting of 124 units (11 1-bedroom and 14 2-bedroom). PBV units (80 1-bedroom and 13 2-bedroom) are for persons aged 62 years and over.
Fairlands SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Ferne	1	Leased/Issued	No	Family project consisting of 16 2-bedroom units. PBV unit is for families.
Fuji Towers	104	Leased/Issued	No	Senior project consisting of 124 units (72 studio and 68 1-bedroom). PBV units (53 studio and 51 1-bedroom) are for persons aged 62 years and over.
Gish Apartments	6	Leased/Issued	No	Family project consisting of 35 units (9 studio, 14 2-bedroom, and 12 3-bedroom units). PBV units (3 studio and 3 2-bedroom) are for disabled families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Homestead SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
Julian Gardens	9	Leased/Issued	No	Family, new construction project, consisting of 9 3-bedroom units. PBV units are for families.
Kings Crossing Apartments	25	Leased/Issued	No	Family project consisting of 94 units (34 1-bedroom, 34 2-bedroom, and 26 3-bedroom units). PBV units (9 1-bedroom, 12 2-bedroom, and 4 3-bedroom) are for chronically homeless families.
Klee/Offenbach SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Laurel Grove Family Apartments	81	Leased/Issued	No	Family, new construction project, consisting of 82 units (14 1-bedroom, 43 2-bedroom, and 25 3-bedroom units). PBV units are for families and to be identified special needs and/or chronically homeless families.
Leigh Avenue Senior Apartments	63	Committed	No	New construction senior project, 100% PBVs for seniors.
Lenzen Gardens Senior Apartments	93	Leased/Issued	No	Senior project consisting of 94 units (89 1-bedroom and 5 2-bedroom). PBV units (89 1-bedroom and 4 2-bedroom) are for persons aged 62 years and over.
Llewellyn Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Lucretia Gardens	16	Leased/Issued	No	Family project consisting of 16 3-bedroom units. PBV units are for families.
Maryce Freelen Place	18	Leased/Issued	No	Family project consisting of 74 units (24 1-bedroom, 26 2-bedroom, and 24 3-bedroom units). PBV units (2 1-bedroom, 6 2-bedroom, and 10 3-bedroom units) are for families.
Met South	10	Leased/Issued	No	Family, new construction project, consisting of 31 units (9 studios, 8 1-bedroom, 5 2-bedroom, and 9 3-bedroom). PBV units are for seniors and large families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Miramar Apartments	16	Leased/Issued	No	Family project consisting of 16 units (8 1-bedroom and 8 2-bedroom). PBV units are for families.
Monticelli Apartments	23	Leased/Issued	No	Family and Senior project consisting of 52 units (25 1-bedroom and 27 3-bedroom). 14 1-bedroom PBV units are for persons aged 62 and over, and 9 3-bedroom PBV units are for families.
Morgan Hill Family – Scattered Site (Palomino)	18	Leased/Issued	No	Family, new construction project, consisting of 18 total units. PBVs units are for large families, those with special needs, and chronically homeless families
Morgan Hill Family – Scattered Site (Overo)	8	Leased/Issued	No	Family, new construction project, consisting of 8 units. PBVs are for those at risk of homelessness
Morgan Hill Family – Scattered Site (Tobiano)	14	Leased/Issued	No	Family, new construction project, consisting of 14 total units. PBVs units are for large families, families at risk of homelessness, and chronically homeless families
Moulton Plaza	8	Leased/Issued	No	Family project consisting of 66 units (30 1-bedroom, 26 2-bedroom, and 10 3-bedroom). PBV units (2 2-bedroom, and 6 3-bedroom) are for families.
North San Pedro Apartments	60	Committed	No	Family and veteran's new construction project, with 135 total units. 60 PBVs will be dedicated to the chronically homeless and 49 for HUD-VASH.
Onizuka Crossing - CHDR	13	Leased/Issued	No	Family, new construction project, consisting of 58 units (27 1-bedroom, 11 2-bedroom, and 20 3-bedroom). PBV units (13 1-bedroom) are for chronically homeless families.
Opportunity Center	55	Leased/Issued	No	Family project consisting of 88 units (70 studios, 12 1-bedroom, and 6 2-bedroom). PBV units (48 studio, 3 1-bedroom, and 4 2-bedroom) are for chronically homeless families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Page Street	27	Committed	No	New construction family project consisting of 82 total units. 27 PBVs committed to the chronically homeless.
Park Avenue Senior Housing	99	Committed	No	Senior, new construction, 94 1-bedroom, 5 2-bedroom. PBV units are for persons aged 55 years and over.
Parkside Studios	7	Leased/Issued	No	Family project consisting of 59 units (58 studios and 1 1-bedroom). PBV units (7 studios) are for chronically homeless families.
Parkview Senior Apartments	24	Leased/Issued	No	Senior project consisting of 140 1-bedroom units. PBV (24 1-bedroom) units are for persons aged 55 years and over.
Poco Way Apartments	10	Leased/Issued	No	Family project consisting of 130 units (14 1-bedroom, 54 2-bedroom, 54 3-bedroom and 8 3-bedroom units). PBV units (3 1-bedroom, 3 2-bedroom, and 4 3-bedroom) are for families.
Pollard SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Quetzal Gardens	32	Committed	No	Family, new construction project, consisting of 70 total units. 32 PBVs dedicated to large families, those with special needs, and the chronically homeless
Renascent Place	160	Leased/Issued	No	Family, new construction project, consisting of 160 units. PBV units are for chronically homeless families.
Rincon Gardens Senior Apartments	198	Leased/Issued	No	Senior project consisting of 200 units (190 1-bedroom and 10 2-bedroom). PBV units (189 1-bedroom and 9 2-bedroom) are for persons aged 55 years and over.
San Antonio Place	30	Leased/Issued	No	Family project consisting of 120 units (118 studio, 1 1-bedroom, and 1 2-bedroom). 30 studio PBV units are for families

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
San Veron Park Apartments	6	Leased/Issued	No	Family project consisting of 32 units (10 2-bedroom, 15 3-bedroom, and 7 4-bedroom). PBV units (3 2-bedroom, 2 3-bedroom, and 1 4-bedroom) are for families
Sango Court	20	Committed	No	New construction family project consisting of 102 total units. 20 PBVs for those with special needs.
Santa Familia	13	Leased/Issued	No	Family project consisting of 79 units (30 1-bedroom, 23 2-bedroom, and 26 3-bedroom). PBV units (4 1-bedroom, 4 2-bedroom, and 5 3-bedroom) are for families
Second Street Studios	134	Leased/Issued	No	Family, new construction project, consisting of 135 units (128 studios, 6 1-bedroom, and 1 2-bedroom units). PBV units are for chronically homeless families.
Shorebreeze	20	Committed	No	Family, new construction project, consisting of 61 total units. 20 PBVs for those at risk of homelessness
Sobrato Apartments	34	Leased/Issued	No	60-unit project consisting of 15 PBV units (7 2-bedroom and 8 3-bedroom) for families at risk of homelessness and 19 2-bedroom PBV units for chronically homeless families.
Stevenson House	9	Leased/Issued	No	Senior project consisting of 120 studio and 1-bedroom units. PBV units (6 studio and 3 1-bedroom) are for persons aged 62 years and over.
Sunset Gardens Senior Apartments	74	Leased/Issued	No	Senior project consisting of 75 units (70 1-bedroom and 5 2-bedroom). PBV units (70 1-bedroom and 4 2-bedroom) are for persons aged 55 years and over.
Timberwood Apartments	20	Leased/Issued	No	Family project consisting of 286 units (84 studios, 164 1-bedroom, and 38 2-bedroom). PBV units (6 studio, 6 1-bedroom, and 8 2-bedroom) are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Tully Gardens	20	Leased/Issued	No	152-unit family project with 10 SRO PBV units for disabled families and 10 PBV units for chronically homeless families.
Tyrella Gardens Apartments	13	Leased/Issued	No	Family project consisting of 56 units (12 1-bedroom, 32 2-bedroom, and 12 3-bedroom). PBV units (4 1-bedroom, 6 2-bedroom, and 3 3-bedroom) are for families.
Ventura	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units are for families.
Ventura Apartments	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units are for families.
Veranda	6	Leased/Issued	No	Senior, new construction project, consisting of 19 units. 6 studio PBV units are for persons aged 55 years and over.
Village at Willow Glen	20	Leased/Issued	No	Senior project consisting of 133 units. PBV units (17 1-bedroom and 3 2-bedroom) are for persons aged 55 years and over.
Villas on the Park	83	Leased/Issued	No	Family project consisting of 83 units. PBVs are for the chronically homeless.
Waldo	3	Leased/Issued	No	Family project consisting of six 1- and 2-bedroom units. Three 1-bedroom PBV units are for families.
Wheeler Manor	10	Leased/Issued	No	Senior project consisting of 111 1-bedroom units. PBV units (10 1-bedroom) are for persons aged 62 years and over.
Wolfe SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
2,458		Planned Total Existing Project-Based Vouchers		

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

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

SCCHA does not anticipate holding any units off-line or acquiring or developing any additional local, non-traditional units during the Plan year.

vi. **General Description of All Planned Capital Expenditures During the Plan Year**

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

SCCHA recently acquired 2.3 acres of land on Race Street in San José, utilizing \$12 million in MTW funds. The first of two planned projects at this site is Alvarado Park Senior Housing that includes 89 affordable units targeting seniors. The second, Bellarmino Place Family Housing is comprised of 115 affordable units for working families. SCCHA will request MTW funds for development in FY2020.

In prior Plan Years, MTW funds in the amount of \$30 million were used to acquire property on East Santa Clara Street. This property will become home to the new SCCHA offices, multi-family affordable housing units, and open space green areas. Master planning will continue into FY2020 and MTW funds will be used to obtain entitlements and conduct appropriate environmental reviews.

The Park Avenue project is currently under construction with an estimated completion date in early FY2021. Additionally, approximately \$3.7 million is dedicated for the interior and exterior rehabilitation of 20 townhome units at the San Pedro Gardens project, \$3.2 million for exterior siding at the Huff Gardens project, and \$3 million to buy out limited partnership interests and \$8 million to pay off a City of San Jose loan at the El Parador project.

B. LEASING INFORMATION

i. **Planned Number of Households Served**

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	48	4
MTW Housing Choice Vouchers (HCV) Utilized	201,300	16,775
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	12,396	1,033
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	213,744	17,812

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	0	0
Property-Based	Create Affordable Housing Acquisition and Development Fund/Activity 2012-3 Create Affordable Housing Preservation Fund for SCCHA and Affiliate-Owned Properties/Activity 2012-4	12,396	1,033
Homeownership	N/A	0	0

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None
MTW Housing Choice Voucher	The Santa Clara County rental market continues to be a challenge to leasing up of Housing Choice Vouchers. HCV holders who are looking for housing continue to face extremely high rents and reluctance on the part of landlords. In FY2019, SCCHA increased its voucher payment standards, and continued landlord recruitment and retention efforts. SCCHA is implementing MTW Activity 2017-3, which provides bonus payments to new Section 8 landlords, and is continuing to engage a community partner to assist voucher holders in their housing search. SCCHA is also continuing to encourage the expansion of affordable housing supply through the use of Project-Based Vouchers, in partnership with the City of San José and the County of Santa Clara. SCCHA anticipates that approximately 300 PBV units will finish construction and approximately 200 new PBVs will be committed during FY2020.
Local, Non-Traditional	None

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Public Housing Units	Site Based	743	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific	5,260	Closed	Yes
Project-Based, Local, Non-Traditional MTW Housing Assistance Program	Site Based	6,669	Closed	No

Please describe any duplication of applicants across waiting lists:

SCCHA has eight (8) properties where households are assisted through Project-Based, Local, Non-Traditional MTW Housing Assistance Programs. Buena Vista Mobile Home Park does not have a waitlist. The number of people on the waitlists for the rest of the projects are as follows: 1,379 for Poco Way, 85 for El Parador, 148 for Huff Gardens, 70 for San Pedro Gardens, 75 for Pinmore Gardens, 136 for Blossom River, 159 for Helzer Court Apartments, 93 for Morrone Gardens, 559 for Clarendon Apartments, 755 for Bendorf Drive Apartments, and 3,210 for Ford Road Plaza.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Federal MTW Housing Choice Voucher Program	Waiting list is projected to re-open in FY2020 and remain open as an Open Interest List allowing individuals to add themselves to the list at any time and/or update their information.

III. Proposed MTW Activities (HUD Approval Requested)

This section describes the five new MTW activities and one re-proposed activity that SCCHA proposes to implement in FY2020.

2020-1: INCREASE PBV PROGRAM CAP TO 40 PERCENT OF CONSOLIDATED ACC AUTHORIZED UNITS *(Proposed Activity)*

Activity Description

The Housing Opportunity Through Modernization Act of 2016 (HOTMA) allows PHAs to project-base up to 20 percent of their Consolidated Annual Contributions Contract (CACC) authorized units, and up to an additional 10 percent for units allocated for 1) those who are homeless, 2) veterans, 3) supportive housing for persons with disabilities or the elderly, or 4) projects located in census tracts where the poverty level is 20 percent or less. (Public 114-201, 130 Stat. 782 – implemented by PIH Notice 2017-21, Attachment C).

Proposed Activity 2020-1 would waive the above restrictions and raise the PBV Program Cap to 40 percent of the CACC authorized units, without requiring any special allocations or target populations for the PBVs beyond 20 percent of the CACC. On an annual basis, SCCHA would evaluate the previous year's voucher turnover rate and the following year's fiscal outlook to decide how many PBVs to allocate.

The Santa Clara County, California, area is one of the least affordable places to live in the United States. While rents are high, vacancy rates have been consistently below 5% (3.1% for the fourth quarter of CY2018). Housing supply has also not increased at a level sufficient to put downward pressure on rents. According to the California Housing Partnership Corporation, Santa Clara County would need over 67,000 additional affordable units just to meet current demand.

PBVs are the most effective tool at SCCHA's disposal to increase affordable housing supply in the area. Affordable housing developers can use the rental subsidies that PBVs provide to leverage funding from tax credit investors and banks. Since 2015, over 1,100 PBVs have been awarded or are in the process of being awarded to developers by SCCHA. In addition to being useful for affordable housing developers, PBVs are also less difficult to lease-up, since the owners of the projects are usually experienced in housing lower income tenants. SCCHA's lease-up rate for PBV units is consistently over 95 percent. Therefore, this activity simultaneously benefits Section 8 participants and SCCHA's leasing rates, while encouraging investment in affordable housing.

Relation to Statutory Objectives

This activity supports the statutory objective of expanding participants' housing choices.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates allocating 300 to 400 vouchers per year to PBVs. At that rate, it would take

approximately 13 to 15 years for SCCHA to reach 40 percent of its current CACC Authorized Units.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. SCCHA will count PBVs issued to new affordable housing projects as displacement prevention (standard metric HC #4: Displacement Prevention). The benchmark will set an initial level of 300 issued PBVs per year, until SCCHA's PBV program cap is reached. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-1: Increase PBV Program Cap to 40 Percent of Consolidated ACC Authorized Units				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #4: Displacement Prevention (per year)				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease) per year.	0*	300	N/A	N/A

* The baseline does not include the 2,660 PBVs already issued or under contract before HUD's approval of this activity. As this activity is implemented, SCCHA will provide a running total of additional PBVs issued here.

Cost Implications

SCCHA anticipates that the proposed activity would not have significant cost implications, since PBV contract rents are limited by the Fair Market Rents and tenant rent portions are a fixed percentage of their income.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 1, Subsection e. of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o)(13)(B) of the 1937 Act and 24 CFR 983 as necessary to implement SCCHA's MTW Plan. This authorization is needed in order to raise the PBV Program Cap as set in HOTMA from 20 percent of CACC Authorized Units to 40 percent, and to remove the restrictions on the PBVs above 20 percent.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

2020-2: INTERIM HOUSING

(Proposed Activity)

Activity Description

With its Moving to Work (MTW) authority, and in accordance with the First Amendment to SCCHA's MTW Agreement, SCCHA proposes a local, non-traditional activity, which creates a unique local rental subsidy program to assist special needs populations. SCCHA will partner with the City of San José and the County of Santa Clara to subsidize units in a multi-unit complex, master leased by a case management agency. SCCHA will use the interim housing units to provide short-term housing for individuals and families approved for a Permanent Supportive Housing (PSH) unit to which SCCHA has attached a PBV and that is not ready for occupancy. The interim housing will move these highly vulnerable homeless clients off the street while they await their permanent home and will provide stability and allow case managers to begin engaging with the clients.

This activity will meet a local need by providing short-term housing to families who are approved for a PSH unit, but are not able to move in right away, usually due to construction delays. Affordable housing is booming in Santa Clara County and new projects are constantly in development. While construction moves quickly, delays sometimes push back move in dates for months. The goal of this activity is to provide stable housing until residents can move into the permanent unit, for which they are already approved. This could result in a resident remaining in an interim housing arrangement for 2-6 months. In the past year approximately 154 residents might have benefited from this activity as they were victims of construction delays, which pushed back move-in dates, causing undue stress and frustration during a time that should have been joyful.

The individuals and families who qualify for the PSH units are chronically homeless or homeless with special needs, as defined in activities 2009-5 and 2017-2. Gaps of time between approval and move-in cause delays in treatment as case managers struggle to maintain contact with individuals who might move around frequently. This activity will alleviate stress on all parties as the individuals and families will be in a known, accessible, safe location with SCCHA covering the rental costs. This activity will assist case managers and their clients as they develop and maintain the therapeutic relationship as well as provide stability for families as they prepare for permanent housing.

Developers of affordable housing are subject to strict deadlines from the tax credit agencies. This activity assists developers in meeting occupancy deadlines by ensuring future residents are available to move into their permanent home as soon as construction is complete. Recent projects experiencing construction delays struggled to replace applicants when they were lost, either due to the applicant opting out because of delays or simply because case managers were unable to locate the applicant by the time construction finally finished.

SCCHA will ensure compliance with HQS requirements and will abide by other requirements set forth in PIH Notice 2011-45 regarding parameters for local, non-traditional activities, including those specifically identified under the subheading Rental Subsidy Programs. During the term of the interim housing, the residents will pay any rent amount directly to the community agency SCCHA hires to administer this program. SCCHA expects its cost related to the project to be paid

to the agency administering the program and could be approximately \$1,080,000, which covers 30 interim units at \$100 per night for 365 nights.

Implementation of this activity will be in conjunction with our partners at the City of San José and the County of Santa Clara. The City and the County are pursuing their own interim housing solutions and the goal is for SCCHA to share in the location leased by the City or the County's case management agency.

Relation to Statutory Objectives

This activity addresses the statutory objective of increasing housing choices for low income families by providing stability to clients approved for Permanent Supportive Housing, when construction or other extenuating circumstances delay availability of the new unit.

Anticipated Impact of the Activity

SCCHA anticipates this activity will stabilize clients prior to moving into their permanent housing and provide case managers regular and consistent access to clients.

Anticipated Schedule for Achieving the Stated Objectives

Upon approval, SCCHA will work with community partners to identify a location, master leased by the community partner, where several units would be available for SCCHA's participants. SCCHA hopes to implement this activity 6 months after approval.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-2: Interim Housing				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for chronically homeless or homeless with disability households at or below 80% AMI as a result of the activity (increase).	0	30	30	N/A
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	30	30	N/A
HC #7: Households Assisted by Services that Increase Housing Choice				
Number of households receiving services aimed to increase housing choice (increase).	0	30	30	N/A

Cost Implications

This activity will involve a cost to SCCHA in the amount of the contracted room rental rate, to be negotiated with our partners at the City of San José and the County of Santa Clara. SCCHA anticipates the cost could be as high as \$1,080,000, based on current hotel rates for 30 units over the course of one year.

Authorization for the Activity

The proposed activity is authorized as a local, non-traditional activity in the First Amendment to SCCHA's MTW Agreement with HUD, which amends Attachment D, "Use of MTW Funds," executed on April 30, 2010. This authorization is needed to allow SCCHA to use HCV funding for temporary, interim housing.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

2020-3: OVER-HOUSED/UNDER HOUSED PBV HOUSEHOLDS

(Proposed Activity)

Activity Description

SCCHA proposes that if a family receiving Project Based Voucher assistance is over-housed or under housed but not in violation of Housing Quality Standards space standards, the family may remain in the wrong sized unit if the rental market vacancy rate is below five percent until (1) an appropriate sized unit becomes available at the project; or (2) the family requests a tenant based voucher, whichever occurs first. Families in violation of HQS space standards will not be allowed to remain in a wrong-sized unit and will receive a 90-day notice to move to a right-sized unit.

Under HUD regulations a family receiving Project Based Voucher assistance must not be over-housed or under housed based on the PHA's subsidy standards. This restriction applies both at the time of move in and any time during the family's occupancy. If a family's size changes during the PBV tenancy and the change results in the family becoming over-housed or under housed in the current PBV unit, HUD requires the family either move to a right sized PBV unit or receive a tenant-based voucher and a reasonable time to move.

The Santa Clara County rental housing market is one of the most expensive in the nation with record low vacancy rates. The proposed activity will address SCCHA concerns with forcing PBV families to move during a time of reduced rental housing availability and high rents.

Relation to Statutory Objectives

The proposed activity addresses the statutory objective of increasing housing choices for families by giving families the option of remaining in a wrong-sized unit until an appropriate size unit is available for occupancy.

Anticipated Impact of the Activity

SCCHA anticipates this activity will increase the housing options for families not living in an appropriate size unit by allowing them to remain in their unit until an appropriately sized unit becomes available at the property or the local rental market softens, increasing unit inventory.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity upon approval.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-3: Over-Housed/Under Housed PBV Households				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	75	0	N/A	N/A

Cost Implications

Because all tenant rents at PBV projects are fixed at 32% of gross income and unit rents are fixed, this activity will not have any cost implications for SCCHA.

Authorization for the Activity

The proposed activity is authorized in SCCHA's Moving to Work Agreement, Attachment C Part D.3.b and waives certain provisions of 24 CFR 983 Subpart F as necessary to allow PBV families to remain in wrong sized units with continued assistance until an appropriate sized unit becomes available if the family is not in violation of HQS subsidy standards.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

2020-04: RENT TO OWNERS & RENT REASONABLENESS

(Proposed Activity)

Activity Description

HUD regulations require that during an assisted tenancy, the rent paid to owner not exceed the reasonable rent as determined by the Public Housing Authority (in comparison with comparable units in the current rental market). Occasionally, upon an owner's request for a rent adjustment of a specific amount (which can be done annually), the reasonable rent for the unit according to rental comparisons of similar units will not only **not** support the increased rent amount the owner is requesting but will be lower than the current approved rent for the unit. In these situations, HUD regulations require that SCCHA reduce the approved contract rent to reflect the current reasonable rent.

This situation is problematic as owners are generally not receptive to a reduction in monthly rent, however small the amount may be. The shortage of available housing, especially affordable housing, coupled with the high-priced rental market in Santa Clara County means that landlords can be more selective in choosing their tenants and are not forced to accept a lower amount of rent to maintain their unit's occupancy. Currently, Santa Clara County's housing vacancy rate is approximately 3%, well below what is considered a "healthy rate" of vacancy and supports the landlord's ability to be selective in choosing their tenants.

In addition, rents in Santa Clara County have continued to increase year after year, with a 4.36% increase in the last year. Rental comparisons provided by GoSection 8 when processing a rent adjustment vary significantly and often are not completely accurate due to the volatile rental market in Santa Clara County (as demonstrated by the continued significant rent increases). Other rent reasonableness tools utilized for the same purpose have produced the same results, reporting rental comparisons that are out of context with the current rental market. Continuing to utilize the previously approved contract rent in this situation is the best course of action to remain competitive in the Santa Clara County rental market.

Maintaining a unit at its current contract rent despite the slight disparity in rent reasonableness allows SCCHA to preserve its lease-up rate while maintaining its affordable housing inventory for Section 8 housing choice voucher holders. Current SCCHA monthly rental payment data shows that the payment differential, occurs infrequently, at a rate of approximately 3 in 100 tenants with the average difference between owner-requested rent and reasonable rent as calculated by our database of \$118.

To remedy this issue, SCCHA proposes waiving the requirement to reduce the approved contract rent in these circumstances. Instead, SCCHA seeks HUD approval to review and potentially reduce the approved contract rent only in those cases (identified through owner-initiated rent increases) where the HUD-issued Fair Market Rents (FMRs) for the applicable bedroom size have dropped by 10% or more since the unit's last rent reasonableness review.

As previously stated, Section 8 housing choice voucher holders already experience a significant difficulty in securing an affordable rental unit in this County; approval of this activity will aid in retaining units currently occupied by Section 8 housing choice voucher holders by allowing SCCCHA to remain somewhat competitive in meeting rental market demands.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing housing choices by way of retaining owners and affordable housing inventory in the Section 8 Voucher program and achieving greater cost effectiveness by eliminating the administrative burden placed on SCCCHA staff to conduct additional unplanned rental contract discussions.

Anticipated Schedule for Achieving the Stated Objectives

SCCCHA anticipates, upon HUD approval, to implement this activity immediately.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. As this activity is implemented, SCCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-04: Rent to Owners & Rent Reasonableness				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	264	0	N/A	N/A

Cost Implications

SCCCHA anticipates that the proposed activity will, based on SCCCHA's own estimates of 264 affected households not having their monthly rent reduced by an average of \$118, cost up to approximately \$31,000, monthly, for an overall total of nearly \$374,000, annually.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 2, Subsection c. of SCCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o)(10) of the 1937 Act and 24 CFR 982.507 as necessary to implement SCCCHA's MTW Plan. Waiving this provision allows SCCCHA to develop and implement a process to determine rent reasonableness that is different from the currently mandated program requirements and meets the needs of its Section 8 housing choice voucher program.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative. There will be no hardship policy for this activity as participants are already allowed to request a review of the contract rent as established by SCCHA policies.

This activity was made available for public review on SCCHA's website and via paper copy in the SCCHA lobby. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

2020-5: ELIMINATE THE 40% OF INCOME CAP AT INITIAL LEASING

(Proposed Activity)

Activity Description

SCCHA is proposing to raise the current 40% cap on the percentage of family income spent on rent to a 50% cap. Current HUD regulations stipulate that at the time of initial lease up and when the approved contract rent exceeds the applicable payment standard, the family is prohibited from spending more than 40% of their monthly income towards the rent. In an area of the country where it is typical to pay over 50% of your monthly income towards housing costs, this regulation is prohibitive towards Section 8 tenants, especially when rental owners typical have hundreds of applicants vying for one rental unit.

In the highly volatile rental housing market and with extremely low vacancy rates (current vacancy rate for all classes of apartments is less than 3%), Santa Clara County (aka Silicon Valley) landlords can demand and receive a higher rent than what SCCHA's payment standard will cover. This proposed activity will increase the number of housing options for shopping voucher holders, while still ensuring some level of protection for Section 8 renters (instead of lifting the cap entirely).

This Activity is being proposed as a technical amendment bypassing the public notice period, due to the 2019-2020 COVID-19 pandemic. The Santa Clara County Public Health Department issued a wide-ranging shelter-in-place order effective March 16, 2020, which closed all non-essential businesses in the County. SCCHA anticipates a dramatic increase in the number of people experiencing housing insecurity, and this Activity will remove one of the barriers to quickly leasing up voucher holders. *The activity will initially be temporary through June 30, 2021.* SCCHA ~~will~~ *may* re-propose this Activity in the FY2022 Annual Plan after evaluating the effectiveness of the policy.

Relation to Statutory Objectives

This activity directly relates to the statutory objective of increasing housing choice.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity upon approval.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-5: Eliminate the 40% of Income Cap at Initial Leasing				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit or a neighborhood of opportunity as a result of the activity (increase).	0	45	N/A	N/A

Cost Implications

SCCHA anticipates that the proposed activity will have no cost implications for the agency.

Authorization for the Activity

This proposed activity is authorized in SCCHA's Moving to Work Agreement, Attachment C, Paragraphs D.2.a., and waives certain provisions of Section 8 (o) (1), (2), (3), (10) and 8 (o) (13) (H)-(I) of the 1937 Act and 24 CFR 982.508, 24 CFR 982.503, and 24 CFR 982.518 as necessary to implement SCCHA's MTW Plan. This authorization is needed to waive the requirement to cap the family's rent share to no more than 40% of their monthly income at initial occupancy.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was proposed as a technical amendment in response to events which occurred after the draft Annual Plan was made available for public review. Consequently, this activity was not included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will ~~obtain approval from~~ **advise** its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report. This activity will expire ~~after one year~~ **June 30, 2021**, and SCCHA may re-propose the activity in the FY2022 Annual Plan with a full public notice period.

2020-6: REDUCED FREQUENCY OF PERIODIC INSPECTIONS

(Proposed Activity)

Activity Description

Pursuant to 24 CFR 982.405, SCCHA currently conducts periodic unit inspections biennially for all leased units. This activity would change the cycle to a triennial basis for all MTW participants. SCCHA is proposing this activity as a technical amendment to take effect immediately during FY2020, in response to the widespread economic disruption caused by the 2019-2020 COVID-19 pandemic. In March 2020, Santa Clara County and all of California became subject to shelter-in-place orders, which mandated that the vast majority of people stay home and for non-essential businesses to close. The shelter-in-place orders have resulted in widespread layoffs and economic hardship amongst the populace, while also disrupting SCCHA operations since most staff are not allowed to go to the office.

The current regulatory requirement of conducting Housing Quality Standards (HQS) inspections at least once every two years, during the course of the crisis created by the pandemic, is unduly burdensome on SCCHA staff, participants, and landlords, all of whom must maintain “social distancing” to avoid infection by COVID-19. With the frequency modified to once every three years, SCCHA will delay the scheduled regular inspections of units whose previous two-year cycles would have required another inspection in the next twelve months. The inspections of these units will instead be delayed for an additional twelve months, or six months after the lifting of the shelter-in-place orders, whichever is later. This activity will not affect HQS inspections for new contracts.

This activity will take effect immediately as a technical amendment, bypassing the public notice and comment period. This re-proposed activity will last until June 30, 2021 or six months after the shelter-in-place orders have been lifted, whichever is longer. SCCHA will evaluate the activity, and if effective and beneficial will seek a full re-proposal with public comment and hearing in a future Annual Plan.

Relation to Statutory Objectives

This activity supports the statutory objectives of delivering services in a cost-effective manner and in ways that reduce administrative costs.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates this re-proposed activity immediately, during FY2020.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency’s electronic database. As this activity is implemented, SCCHA may revise the activity’s metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-06: Reduced Frequency of Periodic Inspections				
Unit of Measurement*	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$376,334	\$282,258	N/A	N/A
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	28,384**	0	N/A	N/A
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease).	19%	10%	N/A	N/A

*In 2013 SCCHA executed a contract with an outside vendor to conduct regularly scheduled inspections on HCV and PBV units. Because the outside vendor charges per inspection, not hourly, reporting on the total decreased time to complete the task in staff hours does not apply.

**Assumes SCCHA staff, rather than outside vendor.

Cost Implications

SCCHA anticipates that the proposed activity will result in fewer periodic inspections, and therefore save staff time as well as the cost of paying an outside vendor to conduct the inspections. As of March 25, 2020, SCCHA has completed 9,530 periodic HQS inspections in FY2020. SCCHA anticipates that it will conduct zero periodic inspections for MTW participants in the next 12 months.

Authorization for the Activity

The proposed activity is authorized in Attachment D, Paragraph C of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o) of the 1937 Act and 24 CFR 982 and 983 as necessary to implement SCCHA's MTW Plan. This authorization is needed in order to change the frequency of periodic inspections of leased units.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was proposed as a technical amendment in response to events which occurred after the draft Annual Plan was made available for public review. Consequently, this activity was not included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will advise its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report. This activity will expire June 30, 2021, and SCCHA may re-propose the activity in the FY2022 Annual Plan with a full public notice period.

2009-1: REDUCED FREQUENCY OF TENANT RE-EXAMINATION

(Re-Proposed Activity 2009-1)

Activity Description

In FY2009, SCCHA proposed and HUD approved Activity 2009-1, which reduced the frequency of tenant re-examinations from once per year to once every two years for families with non-fixed incomes and once every three years for families on fixed incomes. The purpose of the activity was to reduce the administrative burden associated with conducting annual re-examinations.

Activity 2009-1 was also amended in FY2016 to discontinue the use of the HUD-9886 form and replace it with SCCHA's own Authorization to Release Information Form, which is valid for 42 months rather than 15 months.

SCCHA is re-proposing Activity 2009-1 as a technical amendment to take effect immediately during FY2020, in response to the widespread economic disruption caused by the 2019-2020 COVID-19 pandemic. In March 2020, Santa Clara County and all of California became subject to shelter-in-place orders, which mandated that people stay home and for non-essential businesses to close. The shelter-in-place orders have resulted in widespread layoffs and economic hardship amongst the populace, while also disrupting SCCHA operations since most staff are not allowed to go to the office.

The re-proposed Activity 2009-1 will assign MTW participants with non-fixed income to a three-year regular re-examination cycle, and MTW participants with fixed income to a four-year cycle. After this re-proposal is approved, MTW participants whose regular re-examinations had been scheduled during that time period will have their re-examinations rescheduled for twelve months later. This will spread out the administrative burden of re-examinations, allowing SCCHA staff to properly process the participants despite the disrupted work environment. The longer cycle will also mean less families will have to take on the obligation of participating in a re-examination during a difficult period.

This re-proposed activity will take effect immediately as a technical amendment, bypassing the public notice and comment period. This re-proposed activity will last until June 30, 2021 or six months after the shelter-in-place orders have been lifted, whichever is longer. SCCHA will evaluate the re-proposed activity, and if effective and beneficial will seek a full re-proposal with public comment and hearing in a future Annual Plan. If this re-proposed activity is not made permanent, it will revert to the original version of 2009-1.

Relation to Statutory Objectives

This activity supports the statutory objectives of delivering services in a cost-effective manner and in ways that reduce administrative costs.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates this re-proposed activity immediately, during FY2020.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2009-1: Reduced Frequency of Tenant Reexaminations				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$1,887,553	\$516,638	N/A	N/A
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	61,930	30,965	N/A	N/A
CE #5: Increase in Tenant Rent Share				
Tenant rent share in dollars (increase).	\$8,065,166	\$8,065,166*	N/A	N/A
SS #1: Increase in Household Income				
Average earned income of households affected by this policy in dollars (increase).	\$23,021	\$23,021**	N/A	N/A
SS # 3: Increase in Positive Outcomes in Employment Status				
Number of Head of Households employed.	4,317	4,317*	N/A	N/A
Number of Head of Households employed full-time.	N/A***			
Number of Head of Households employed part-time.				
Number of Head of Households enrolled in an educational program.	N/A****			
Number of Head of Households enrolled in job training program.	N/A****			
Number of Head of Households unemployed.	436	436*	N/A	N/A
Number of Head of Households in Other Category (ex: receiving TANF, SSI, Child Support, General Assistance, etc.).	15,211	15,211*	N/A	N/A
SS # 4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Number of households receiving TANF assistance (decrease).	1,955	1,955*	N/A	N/A

SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase).*****	322	322**	N/A	N/A

*SCCHA does not anticipate that this activity will increase the Agency's rental revenue, increase positive outcomes in employment status, or decrease the number of households on TANF assistance. The "tenant rent share in dollars" baseline amount is the total amount that households pay toward rent per month as of the beginning of FY2015.

**SCCHA does not expect that this activity will lead to households increasing their earned income/transitioning off assistance.

***SCCHA does not track whether employment is full-time or part-time.

****SCCHA does not track whether a Head of Household is enrolled in an educational program and/or a job training program.

*****Self-sufficiency is defined as households who leave assistance voluntarily, or after 180 days of zero Housing Assistance Payments.

Cost Implications

SCCHA anticipates that the proposed activity will result in fewer regular re-examinations, and therefore save staff time and effort. As of March 25, 2020, SCCHA has completed 3,627 triennial and biennial regular re-examinations in FY2020. SCCHA anticipates that it will process zero regular re-examinations for MTW participants in the next 12 months.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 1, of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8 of the 1937 Act and 24 CFR 982 as necessary to implement SCCHA's MTW Plan. This authorization is needed to change how often the agency must conduct regular re-examinations of participants.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was proposed as a technical amendment in response to events which occurred after the draft Annual Plan was made available for public review. Consequently, this activity was not included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will advise its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report. This activity will expire after one year, and SCCHA may re-propose the activity in the FY2022 Annual Plan with a full public notice period.

2014-1B: FOCUS FORWARD PART II, TIME LIMIT, RENT STRUCTURE, AND LIMITED PORTABILITY (Re-Proposed Activity 2014-1b)

Activity Description

SCCHA is re-proposing 2014-1b to waive the provisions of 24 CFR Part 982 relating to portability. Due to the unique nature of the FFP program, the specialized administration of counseling, case management, and escrow account services, and the time-limited housing assistance, portability outside of SCCHA's jurisdiction would not be appropriate.

SCCHA originally proposed the Focus Forward Program (FFP) as Activity 2014-1 as a modified version of the Family Self Sufficiency program, then amended and separated out elements the FFP in the FY2017 MTW Annual Plan. The case management, escrow account, and economic incentives aspects were consolidated into the re-proposed Activity 2014-1a, and the time-limiting of the housing voucher and modified rent structure were re-proposed as Activity 2014-1b.

The current re-proposal of Activity 2014-1b is to incorporate limitations on the portability of the voucher for a participant in the FFP. Instead of granting outgoing portability requests automatically, SCCHA will implement a review process where requests due to qualified hardships, obtaining full-time employment, or attending an accredited education institution outside the borders of Santa Clara County will be considered.

SCCHA is requesting to use its MTW designation to implement a pilot family self-sufficiency program that is tailored to meet the needs of Santa Clara County participants. SCCHA decided to split FFP into two MTW activities; one encompassing the case management, and incentives of the program, including escrow (MTW activity 2014-1a), and the second, encompassing the time limits and rent structure of the program (MTW activity 2014-1b). The FFP will be a pilot program, therefore the proposed rent calculation structure may be more likely to be revised and re-proposed in the future, as initial data of the pilot program is received. For this reason, SCCHA separated the time-limit and rent structure aspect of the program so that if it is re-proposed in the future, the services and incentives provided to FFP participants can continue without interruption.

In this activity, SCCHA received HUD approval for the pilot FFP to be a voluntary 10-year time-limited self-sufficiency program open to all head of households on the SCCHA waiting list. If an applicant on the SCCHA waiting list volunteers to participate in the FFP, they will move to the top of the waiting list. The applicant will elect to join this program with the understanding that FFP participants will receive housing assistance only during their 10-year participation in the program. The 10-year window provides participants with the opportunity to achieve their individualized goals with the highest degree of available services—and allows the Housing Authority to assist more families in need in the County's tight housing market. Applicants, even if elderly and disabled, who volunteer to participate in FFP will go through an extensive outreach and enrollment process in which requirements of the program will be explained. If after the enrollment process, an applicant believes they will not be able to participate and comply with all requirements of the FFP, they will have the option to quit the program and return to their original

spot on the SCCHA waiting list. FFP's time-limited vouchers will not be portable outside of Santa Clara County, except for certain hardship circumstances as will be described in the Hardship Case Criteria section below.

During the pilot stage of the FFP, households that are not already on the waiting list and Section 8 participants currently receiving housing assistance from SCCHA will be ineligible. However, SCCHA will continue its Family Self-Sufficiency program until families currently enrolled are graduated. If enrollment of the pilot FFP does not reach capacity, SCCHA may open its Housing Choice Voucher waiting list specifically targeting applicants who are interested in enrolling in the ten-year time-limited FFP program. SCCHA recognizes there may be other families that would benefit from the FFP and will evaluate the opportunity for program expansion at the end of the pilot period.

In addition, SCCHA plans to implement a Stepped Subsidy rent calculation that will require participants to take on more fiscal responsibility for their rental payments as they progress through the program. The increase in responsibility for the rental payment is intended to prepare participants for graduation from the program and from housing assistance as they reenter the open rental market.

The Stepped Subsidy rent calculation will be presented to applicants prior to entering the FFP and will be part of the terms of the program contract. However, the Stepped Subsidy schedule will not be applied to a participating family's rent calculation until year six of their enrollment in the pilot FFP. Upon entering the FFP (years one - five), participants will have a standard rent calculation (the same as SCCHA's MTW programs) based on between 30 to 35 percent of the participant's actual gross monthly income, as approved through MTW activity 2014-4. Case managers will provide participating households with financial counseling (i.e. budgeting, credit repair, etc.) to prepare families for increases in rent, the household may experience after year five or after the completion of the program.

The Stepped Subsidy rent calculation in years six to ten will be based on a fixed amount which is calculated based on a percentage of the applicable Santa Clara County Area Median Income (AMI.) SCCHA will apply its MTW rent calculation method to the fixed AMI amount, based on the current tenant rent portion scale set by the Agency (30%-35% of a family's actual gross monthly income- MTW activity 2014-4). SCCHA's current tenant rent portion is set at 32%.

SCCHA will continue to calculate the family's actual annual income in order to assess actual income gains with the Stepped Subsidy rent calculation. Also, in year six, SCCHA will re-determine the FFP participants' family size only for the purposes of the Stepped Subsidy rent calculation. The participant family size will be based upon the number of adult work-able family members.

An example of the total tenant payment for FFP participants in years six to ten by Family Size is displayed in the chart below (30%-70% of AMI.)

Stepped Subsidy Rent Calculation:

Total Tenant Payment for FFP participants in Years 6-10 by Family Size*

Work-able Persons in Family	Year 6 Based on 30% of AMI	Year 7 Based on 40% of AMI	Year 8 Based on 50% of AMI	Year 9 Based on 60% of AMI	Year 10 Based on 70% of AMI
1	\$625	\$833	\$1,043	\$1,249	\$1,460
2	\$715	\$952	\$1,191	\$1,428	\$1,667
3	\$804	\$1,072	\$1,340	\$1,607	\$1,876
4	\$893	\$1,191	\$1,488	\$1,785	\$2,083
5	\$965	\$1,285	\$1,608	\$1,928	\$2,251
6	\$1,037	\$1,381	\$1,727	\$2,071	\$2,417
7	\$1,108	\$1,476	\$1,845	\$2,215	\$2,584
8	\$1,180	\$1,571	\$1,965	\$2,357	\$2,752

* This chart contains the calculation of 32% of Santa Clara County's pro-rated monthly AMI - \$107,100.

Example 1:

A family of two participating in the FFP, with only one adult work-able family member in year six, would have a monthly total tenant payment of \$625.

Rent calculation:

FY2016- 30% of AMI for 1 person is \$23,450 annually

1. Divide \$23,450 by 12 to determine monthly income= \$1,954
2. Multiply \$1,954 x 32% (SCCHA's tenant rent portion) = \$625

Example 2:

A family of six participating in the FFP, with three adult work-able family members in year 7, would have a total tenant payment of \$1,072.

Rent calculation:

FY2016- 40% of AMI for a family of 3 is \$40,200 annually

1. Divide \$40,200 by 12 to determine monthly income= \$3,350
2. Multiply \$3,350 x 32% (SCCHA's tenant rent portion) = \$1,072

FFP participants whose standard income-based rent calculation would be higher than the set stepped subsidy amount would keep the savings.

Example 3:

A family of three participating in the FFP, with two adult work-able family members in year 6, has an actual annual gross income of \$35,000.

SCCHA MTW Rent calculation (Based on actual annual income):

Family's actual annual income: \$35,000

1. Divide \$35,000 by 12 to determine monthly income= \$2,917
2. Multiply \$2,917 x 32% (SCCHA tenant's rent portion)= \$933*

*Assuming the family's contract rent is at or below the applicable payment standard.

FFP Stepped Subsidy Rent Calculation:

FY2016- 30% of AMI for a family of 2 is \$26,800 annually

1. Divide \$26,800 by 12 to determine monthly income= \$2,233
2. Multiply \$2,233 x 32% (SCCHA's tenant rent portion) = \$715*

*Assuming the family's contract rent is at or below the applicable payment standard.

This family will experience a monthly savings of \$218 or an annual savings of \$2,616 in year 6 of the FFP program.

Relation to Statutory Objectives

This activity directly relates to the statutory objective to give incentives to families whose heads of household are working, seeking work, or are participating in job training, education or other programs that assist in obtaining employment and becoming economically self-sufficient.

Through the pilot FFP, participants are provided resources and incentives that will encourage them to increase their income and meet self-sufficiency goals. The alternative stepped subsidy rent calculation will serve as a motivator and preparation for FFP participants to be prepared for the ending housing subsidy assistance.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA believes the combination of intensive, focused case management, realistic timelines for goal completion and the built-in monetary incentives will provide the pilot FFP participants with the necessary tools to encourage income growth that will lead to long-term improvements in a household's economic self-sufficiency. SCCHA estimates that there will be a significant increase in the percent of program completers who build their income under the FFP as compared to the FSS Program and will thus ultimately allow SCCHA to serve more participants from the waiting list.

Proposed Baseline, Benchmarks, Metrics and Data Collection

SCCHA plans to compile and analyze data from FFP case managers' client notes and its participant database, Emphasys Elite, to report on the HUD standardized metrics below.

Activity 2014-1b: Focus Forward Part II—Time Limit and Rent Structure				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
SS #1: Increase Household Income				
Average earned income of households affected by this policy in dollars (increase).	\$24,278	\$24,278*	N/A	N/A
SS #2: Increase in Household Savings				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$2,000	\$2,000	N/A	N/A
SS#3: Increase in Positive Outcomes in Employment Status				
Number of Head of Households employed	119	119	N/A	N/A
Number of Head of Households employed full-time (increase).	67	67	N/A	N/A
Number of Head of Households employed part-time (increase).	52	52	N/A	N/A
Number of Head of Households enrolled in an educational program (increase)	8	8**	N/A	N/A
Number of Head of Households enrolled in job training program (increase).	4	4**	N/A	N/A
Number of Head of Households unemployed (decrease).	42	81	N/A	N/A
Number of Head of Households in Other Category (ex: receiving TANF, SSI, Child Support, General Assistance, etc.) (decrease).	36	29	N/A	N/A
SS # 4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Number of households receiving TANF assistance (decrease).	0	0	N/A	N/A
SS# 5: Households Assisted by Services that Increase Self Sufficiency				
Number of households receiving services aimed to increase self-sufficiency (increase).	175	200	N/A	N/A
SS#6: Reducing Per Unit Subsidy Costs for Participating Households				
Average amount of Section 8 subsidy per household affected by this policy in dollars (decrease)	0	0***	N/A	N/A
SS#7: Increase in Agency Rental Revenue				
PHA rent revenue in dollars (increase)	0	0***	N/A	N/A
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase)****	0	0	N/A	N/A
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$113	0	N/A	N/A
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	3.6 Hours	0	N/A	N/A

*SCCHA expects that participants will experience no appreciable increase to their income during year 1 of the program, however, will be able to increase their income to 80 percent of the AMI by program year 10 or graduation.

**Year 1 of the FFP will be focused on helping participants enroll and create self-sufficiency goals, obtain employment, financial stability, and vocational skills.

***Self-sufficiency is defined as a household who leaves housing assistance voluntarily or whose income is equal to or greater than 80 percent of the AMI. SCCHA does not anticipate participants will transition to self-sufficiency in year 1 of the FFP.

Cost Implications

SCCHA anticipates that the proposed activity will result in negative cost implications. With a full enrollment of 200 participant households, FFP's annual cost of escrow account incentives, overhead, and staffing are anticipated to be approximately \$650,000 per year. SCCHA anticipates that it will take several years to reach full enrollment, so the actual cost should be less than this amount in the beginning of the pilot program. SCCHA will manage this increased cost by utilizing MTW reserve funds.

Authorization for the Activity

This proposed activity is authorized in SCCHA's Moving To Work Agreement, Attachment C, Paragraphs D.1.c, D.1.g, 2.a, and 2.d., and waives certain provisions of Section 8 (o) (1), (2), (3) (5), (7) and (10) and 8 (o) (13) (F)-(I) and Section 23 of the 1937 Act and 24 CFR 982.353, 24 CFR 982.354, 24 CFR 982.355, 24 CFR 982.508, 24 CFR 982.503, 24 CFR 982.516, 24 CFR 982.518 and 24 CFR 984, 24 CFR 984 Subpart L and 983 Subpart E as necessary to implement SCCHA's MTW Plan. This authorization is needed to issue time-limited vouchers and to implement a revised program rent calculation method.

Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

Impact Analysis:

This activity qualifies as a rent reform initiative because it changes the way rental assistance is calculated and provides a limit for how long rental assistance will last. SCCHA is planning to implement a ten-year time limited program in which participants' rental assistance will end after year 10. In years 1-5, FFP participants' rent will be calculated by SCCHA's MTW rent calculation, approved in MTW activity 2014-4. The rent reform of this activity encompasses a specific stepped subsidy rent calculation for FFP participants that will be implemented in years 6-10.

Regarding this rent reform activity, SCCHA will develop an extensive outreach and enrollment plan to ensure prospective FFP participants are aware of program requirements and expectations. The volunteer households must sign a ten-year participation agreement (like the FSS contract). Households who elect to participate in the pilot FFP may not opt to participate in only one component of the program. The different components of the program are linked, and households must agree to all parts of the program when enrolling. Therefore, the components of the rent reform activity will apply to each participant.

In order to prepare for possible unintended impacts of the rent reform activity, SCCHA will annually evaluate the income levels of program participants in years one to five of the program to ensure program participants are steadily increasing their income level in order to be prepared to meet the requirements of the possible increased tenant rent portion once they have moved to the Stepped Subsidy rent calculation in year six.

Once the rent reform activity has been implemented in year six, SCCHA will continue to monitor the income levels and hardship requests by participants. From this analysis, SCCHA may consider revising and re-proposing the rent calculation method for years six through ten, if it appears that transitioning to the Stepped Subsidy rent calculation would have a negative impact on more than 20 percent of program participants.

Beginning in year one of the FFP program, FFP case managers will work with participants to help build a better understanding of how the stepped subsidy rent calculation in year six may affect their family's rental payments. This discussion early in FFP will allow the case manager and participant to determine how much the participant will need to increase their income, based on their work-able family size, to ensure they will not pay more than 32% of their actual income once the stepped subsidy rent calculation is applied. Annually, the case manager and participant will review progress in increasing income and revise the participant's goal plan, if necessary.

Because this program is voluntary, the hardship policy regarding the Stepped Subsidy rent calculation will address circumstances that were not the fault of the participant (i.e. family illness, loss of job) that make it difficult or impossible to pay the stepped subsidy rent calculation in years six to ten. If a participant applies and qualifies for a hardship during years six to ten, the participant will return to the standard rent calculation (the same as SCCHA's MTW programs) currently based on 32 percent of the participant's actual gross monthly income for up to a twelve-month period. A participant may request this hardship any time in writing after the stepped subsidy rent calculation is applied by contacting their FFP case manager, and a new rent calculation at 32 percent of the participant's actual gross monthly income will be applied the first day of the month after the request is approved. At the end of the hardship period, the family's rent portion will return to the stepped subsidy calculation based on the year of the program that they were enrolled in when they requested hardship considerations.

Families who qualify and apply for this hardship could graduate from the program after 11 years assistance, instead of ten years. SCCHA will maintain a log of families who qualify for the hardship policy to monitor how many hardship cases were granted and the income of the families at the time the hardship rent calculation period expired. On an annual basis, SCCHA will evaluate the FFP participants' income versus the Stepped Subsidy schedule to determine if the amounts participants are required to pay equal to or exceed 40 percent of the family's actual gross monthly income. If more than 20 percent of participants are paying more than 40 percent of their actual gross monthly income under the Stepped Subsidy rent calculation, SCCHA will reevaluate the Stepped Subsidy schedule and consider revising and re-proposing the rent calculation method to HUD.

Vouchers issued under the FFP are not portable outside of Santa Clara County. However, SCCHA will consider portability requests under circumstances. SCCHA's decisions on FFP portability requests are final. The FFP hardship and review policy for requested portability moves outside of Santa Clara County will be as follows:

Basic Requirements:

1. The household is in compliance with all program rules and regulations.

Eligibility Criteria:

1. The Head of Household, Co-head, or Spouse has secured full-time employment of at least 32 hours per week at a job location that is 35 or more miles outside of the Santa Clara County border.
2. The Head of Household, Co-head, or Spouse is a full-time student at an accredited educational institution that is located 35 or more miles outside of the Santa Clara County border.
3. The receiving housing authority is absorbing the household.
4. A request under the Violence Against Women Act is approved.

Application and Review Process:

1. Requesting households must submit all documentation required by SCCHA for a move outside of Santa Clara County.
2. Households requesting a move outside of Santa Clara County who meet Eligibility Criteria # 1 must provide proof of:
 - a. Written verification of employment including the employer's name, the position title, the number of hours to be worked per week, and the rate of pay.
 - b. The address of the employer and the address of the job location, if different.
3. Households requesting a move outside of Santa Clara County who meet Eligibility Criteria # 2 must provide proof of:
 - a. Written verification of enrollment and attendance at the accredited educational institution.
 - b. The address of the accredited educational institution.

This activity was made available for public review on SCCHA's website and via paper copy in the SCCHA lobby. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

IV. Approved MTW Activities (HUD Approval Previously Granted)

To date, SCCHA has had 45 activities approved by HUD. Of these, nine were closed out. The first four numbers of each activity signify the fiscal year in which each activity was approved. Except where indicated in the activity status explanation, SCCHA does not anticipate any changes or modifications to the activities during the Plan year.

Implemented Activities

ACTIVITY 2009-1: REDUCED FREQUENCY OF TENANT REEXAMINATIONS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2009 AMENDED: FY2016

DESCRIPTION OF MTW ACTIVITY

This activity, originally implemented in 2009, reduces the frequency of participant reexaminations in the voucher program. Participants with a fixed income are reexamined every three years and participants with a non-fixed income are reexamined every two years. In FY2015, SCCHA added an amendment to this activity to include its four public housing units under the new reexamination schedule. By including its public housing units under the modified reexamination schedule, SCCHA will be furthering administrative streamlining and labor savings for both its Section 8 and 9 programs.

UPDATE ON MTW ACTIVITY

SCCHA will continue to use this activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity during FY2020.

ACTIVITY 2009-2: EXPEDITING INITIAL ELIGIBILITY INCOME VERIFICATION PROCESS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2009 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to extend the time period in which application documents are valid, from 60 days to 120 days.

UPDATE ON MTW ACTIVITY

Extending the documentation timeframe continues to provide administrative relief, both to applicants and to SCCHA. SCCHA will continue to use this activity in FY2020.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

ACTIVITY 2009-5: EXPLORING NEW HOUSING OPPORTUNITIES FOR THE CHRONICALLY HOMELESS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2011 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

The Chronically Homeless Direct Referral (CHDR) program was implemented in FY2011. The CHDR program increases housing choices and mobility by assisting the homeless population through a more targeted and efficient process than the standard voucher waiting list system. Following a housing-first model, identified chronically homeless families not on the voucher waiting list are referred for project-based housing assistance and connected to case management services with local service providers. In FY2016 SCCHA amended and extended its agreement with Santa Clara County's Office of Supportive Housing, which administers the referral of applicant and oversees the agencies providing intensive case management services.

UPDATE ON MTW ACTIVITY

SCCHA continues to work closely with the County's Office of Supportive Housing to successfully house chronically homeless families throughout the County.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2009-8: 30-DAY REFERRAL PROCESS FOR PROJECT BASED VACANCIES

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows owners to directly refer applicants after 30 days of unsuccessful attempts to fill the Project-Based Voucher (PBV) unit using referrals from the SCCHA waiting list. This activity

reduces the vacancy time for owners and the resultant loss in money thus ensuring the continuation of the PBV contract and the affordability of the units for low income households.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis to fill vacancies in both new construction and existing PBV properties. SCCHA will continue to utilize the activity in this fashion during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2009-9: UTILIZATION OF LOW-INCOME HOUSING TAX CREDIT (LIHTC) TENANT INCOME CERTIFICATION (TIC) FOR INCOME AND ASSET VERIFICATION

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity, first implemented in 2010, allows SCCHA to utilize the owner-provided Tenant Income Certification (TIC) form required under the Low-Income Housing Tax Credit (LIHTC) Program as its sole method for verification of the family's income and assets when filling PBV vacancies for tax credit units. Prior to implementation, households selected to fill a PBV unit that utilized tax credits had to complete initial eligibility calculations under both the Federal LIHTC regulations (Section 42 of the IRS Code) and the Section 8 PBV regulations (24 CFR 5.657, 5.659).

UPDATE ON MTW ACTIVITY

SCCHA currently uses property-owner TIC documentation for initial eligibility and at each regularly scheduled reexamination to verify income and family composition.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

ACTIVITY 2009-11: PROJECT-BASE 100% OF UNITS IN FAMILY PROJECTS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows SCCHA to project-base more than 25% of the units in housing projects that make supportive services available. Although services must be made available and families must be made aware of and encouraged to participate in these services, families do not need to participate in the supportive services. This MTW activity increases housing choices for low-income families by making the units more attractive to families who do not want or need supportive services.

UPDATE ON MTW ACTIVITY

The activity continues to reduce SCCHA's administrative burden by removing the required compliance monitoring for families living in the "excepted" units (i.e. units above the 25% cap).

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

ACTIVITY 2009-13: COMBINED WAITING LIST FOR THE COUNTY OF SANTA CLARA AND THE CITY OF SAN JOSÉ

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2009 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

In 1976, SCCHA signed an agreement to administer the Housing Choice Voucher program on behalf of the City of San José. This agreement allows SCCHA to operate under one Annual Plan, one Administrative Plan, and one combined MTW plan for both housing authorities. In accordance with this agreement, in FY2009, this activity was implemented to permit SCCHA to waive regulation 24 CFR 982.404(f), and to continue to operate one combined waiting list for both the City of San José and the County of Santa Clara. This activity allows SCCHA to operate a joint waiting list for the Housing Choice Voucher (HCV) and the Project Based Voucher (PBV) Programs.

UPDATE ON MTW ACTIVITY

SCCHA continues to operate one combined waiting list for both the City and County housing authorities and for the Housing Choice Voucher (HCV) Program and the Project-Based Voucher (PBV) Program.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: FY2014

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to effectuate an immediate change in voucher size and its corresponding payment standard when changes in family composition or SCCHA's subsidy size policy occur between regular reexaminations. If the application of the new payment standard results in a decrease in the tenant's rent portion, the interim reexamination effective date will be the first of the month following the change. If the application of the new payment results in an increase in the tenant's rent portion, the interim reexamination effective date will be the first of the month following a 30-day notice to the tenant and owner.

UPDATE ON MTW ACTIVITY

This activity continues to result in Housing Assistance Payment (HAP) cost savings by enabling the new payment standards to take effect at the time of an interim reexamination rather than at the next regular reexamination.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

ACTIVITY 2010-2: EXCLUDING ASSET INCOME FROM INCOME CALCULATIONS FOR FAMILIES WITH ASSETS UNDER \$50,000

PLAN YEAR APPROVED: FY2010 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

SCCHA no longer calculates income received from family assets under \$50,000. Since implementation in FY2010, SCCHA has reduced administrative costs through this activity. SCCHA continues to save costs of staff time previously spent on this task.

UPDATE ON MTW ACTIVITY

SCCHA continues to save costs of staff time previously spent on this task.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

2010-3: APPLYING CURRENT INCREASED PAYMENT STANDARDS AT INTERIM REEXAMINATIONS

PLAN YEAR APPROVED: FY2010 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows the application of the current payment standard (if the payment standard has increased since the family's last regular reexamination) to the rental assistance calculation at interim reexaminations.

UPDATE ON MTW ACTIVITY

Since implementation in FY2010, SCCHA has met the statutory objective of reducing administrative costs and increasing housing choice for low-income families. SCCHA has realized savings in staff hours and cost of tasks.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

ACTIVITY 2010-4: ALLOCATING PROJECT-BASED VOUCHERS TO SCCHA-OWNED PROJECTS WITHOUT COMPETITION

PLAN YEAR APPROVED: 2010 IMPLEMENTED: 2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows the Agency to select SCCHA-managed housing for project-based assistance without a competitive process, saving both staff time and other costs that would be related to a competitive process. As a result of this activity, SCCHA is able to cost-effectively and efficiently ensure that these project-based units are available.

UPDATE ON MTW ACTIVITY

SCCHA last utilized this activity in 2016 to allocate 81 PBVs to the Laurel Grove Family Apartments project and 99 PBVs to the Park Avenue Senior Apartments project, both in San José. There are currently no plans to utilize this MTW activity in FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2011-1: STREAMLINED APPROVAL PROCESS FOR EXCEPTION PAYMENT STANDARD FOR REASONABLE ACCOMMODATION – HCV

PLAN YEAR APPROVED: FY2011 IMPLEMENTED: FY2011 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to approve any requests for an exception payment standard above 110 percent (but not to exceed 120 percent) of the published Fair Market Rent (FMR) as a reasonable accommodation for persons with disabilities.

UPDATE ON MTW ACTIVITY

This activity continues to improve SCCHA's responsiveness to the needs of families with members who have disabilities by enabling them to secure an accessible unit more expeditiously.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2011-2: SIMPLIFY REQUIREMENTS REGARDING THIRD-PARTY INSPECTIONS AND RENT SERVICES

PLAN YEAR APPROVED: FY2011 IMPLEMENTED: FY2011 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

SCCHA implemented this activity to waive the regulatory requirement in which HUD must approve a designated, qualified independent agency to conduct Housing Quality Standards (HQS) inspection and rent reasonableness services for SCCHA-owned units. This qualified independent agency conducts both initial and regularly scheduled HQS inspections, as well as rent reasonable services for initial contracts and requested rent adjustments for SCCHA-owned or -controlled properties. In addition, this activity has allowed SCCHA to waive the second part of the HUD regulation that requires the independent agency to supply copies of each inspection report and rent reasonableness determination to the HUD field office.

UPDATE ON MTW ACTIVITY

SCCHA continues to realize the ongoing benefits associated with reduced costs and administrative streamlining related to this activity.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2012-2: MINIMUM TWO-YEAR OCCUPANCY IN PROJECT-BASED UNIT

PLAN YEAR APPROVED: 2012 IMPLEMENTED: 2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

The purpose of the activity is to enhance the occupancy stability in the PBV program, which will result in reduced staff time spent processing PBV move-outs and vacancy outreach. Project-based participants are required to remain in their PBV units for a minimum of two years prior to becoming eligible to request a tenant-based voucher to move with continued assistance.

The activity does not apply to families:

- 1) with an approved reasonable accommodation that requires them to move;
- 2) who experience a change in family composition that affects unit size;

- 3) who present other compelling reasons to move out; or
- 4) who request a move under the Violence Against Women Act (VAWA).

To implement the activity, SCCHA created its own PBV Statement of Family Responsibility and PBV Tenancy Addendum forms to replace the HUD forms. The only change in the SCCHA versions of the forms is the two-year, rather than one-year, PBV residency requirement before tenants may move with continued housing assistance.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2012-3: CREATE AFFORDABLE HOUSING ACQUISITION AND DEVELOPMENT FUND

PLAN YEAR APPROVED: FY2012 IMPLEMENTED: FY2012 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to use MTW funds to pursue opportunities to build new affordable rental housing units through the acquisition of existing land and/or funding the development of units for new construction or rehabilitation.

UPDATE ON MTW ACTIVITY

This activity enables SCCHA to respond quickly to market conditions and purchase land and participate in project development or improvement when the opportunity or need arises. Through this activity SCCHA had developed or is developing housing for hundreds of low, very low and extremely low-income residents of Santa Clara County.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2012-4: CREATE AFFORDABLE HOUSING PRESERVATION FUND FOR SCCHA AND AFFILIATE OWNED PROPERTIES

PLAN YEAR APPROVED: FY2012 IMPLEMENTED: FY2012 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to use MTW funds to assist in its preservation activities and to support the asset management staff that has oversight of the affordable units. The preservation activities include using MTW funds for expenses incurred in rehabilitating the units to extend their useful life and affordability, or to acquire the property or limited partner's interest at the end of the tax credit period to maintain the asset's affordability into the future or pay off existing loans in order to leverage additional financing.

UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity to preserve the long-term stability and viability of existing SCCHA owned and affiliate owned housing. The fund is used to respond to planned events, such as paying soft debt to the City of San José to acquire more of an ownership stake in the assets, and unplanned events arising as properties age.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2013-1: ELIMINATION OF THE EARNED INCOME DISALLOWANCE (EID) CALCULATION

PLAN YEAR APPROVED: FY2013 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity eliminates the HUD-mandated Earned Income Disallowance (EID) calculation. The agency implemented this activity in early FY2015. Since implementation, this activity continues to decrease staff time required to calculate a family's rent portion and reduces errors associated with calculating potential income exclusions.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2014-4: INCREASED TENANT CONTRIBUTION – UP TO 35% OF GROSS INCOME

PLAN YEAR APPROVED: FY2014 IMPLEMENTED: FY2015 AMENDED: FY2015

DESCRIPTION OF MTW ACTIVITY

This activity simplified the calculation of Total Tenant Payment (TTP) to the higher of between 30 and 35 percent of the participant family's gross monthly income or \$50 (minimum rent). Originally implemented in FY2014, this activity eliminated all standard allowances and deductions, as well eliminated the inclusion of a utility allowance in the tenant rent calculation. The initial implementation of this activity increased the TTP to 35 percent as a cost-saving measure in response to diminished funds resulting from federal sequestration. In September 2014, the TTP was reduced to 32 percent. SCCHA re-proposed this activity in FY2015 to include its four public housing units. This activity provides significant costs savings to SCCHA by reducing the amount of Housing Assistance Payment (HAP) paid to landlords. Additionally, the simplified calculation freed up staff hours by streamlining this task.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2015-2: PROJECT BASED VOUCHER INSPECTION SELF-CERTIFICATION

PLAN YEAR APPROVED: FY2015 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity was approved and implemented in FY2015 and allows Project Based Voucher owners and tenants to self-certify the correction of reported Housing Quality Standards (HQS) deficiencies within the 30-day period after the initial HQS inspection. This activity only applies to HQS deficiencies which are not life threatening. This activity reduces expenditures by eliminating

the need for scheduling and conducting a re-inspection.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2015-3: MODIFIED ELDERLY DEFINITION FOR PBV

PLAN YEAR APPROVED: FY2015 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

HUD currently defines elderly to be persons aged 62 year or older and elderly families to those whose head, spouse or co-head are 62 years of age or older. This activity modifies the age, for the Project Based Voucher (PBV) program, at which a person or family is considered elderly from persons aged 62 or older to persons aged 55 or older to align with the definition used by several affordable housing developments in the area. Therefore, PBV sites which define elderly as 55 years of age and older are considered an elderly property.

UPDATE ON MTW ACTIVITY

This change in the definition allows SCCHA to refer a larger pool of applicants (any family with Head of Household or Spouse aged 55 and older) from its PBV waiting list to fill vacancies in these units and will allow the Agency to project-base 100% of the units in a project with aged 55 or older limitations (project is not subject to the 25% PBV per project cap). SCCHA increased the number of available units for households who otherwise would not have qualified under the property's definition of elderly. In FY2019, 6 new elderly PBV units were added.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2016-2: STREAMLINING OF PBV SELECTION REQUIREMENTS

PLAN YEAR APPROVED: FY2016 IMPLEMENTED: FY2018 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity enables SCCHA to select Project-Based Voucher proposals without conducting a competitive selection process where: 1) the proposed project was previously selected for award through any form of open public solicitation or invitation process conducted by a Federal, State, or local government entity, where a proposal is selected subject to funding availability; and 2) the proposed project was selected by the other government entity within the last fifteen years. This activity also eliminates the regulatory requirement that the previous selection process not take into account rental assistance for the proposed project and allows proposers to include PBV assistance in their calculations.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2017-1: PHASING IN THE SUBSIDY STANDARD CHANGE

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2017 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

Under this activity, the SCCHA subsidy standards effective January 1, 2017 did not affect households in a unit under a Housing Assistance Payment contract until (1) the family moves; or (2) the rental market vacancy rate remains five percent or higher for at least six months, whichever occurs first.

UPDATE ON MTW ACTIVITY

SCCHA continues to monitor the vacancy rate in Santa Clara County and because vacancy rates have not increased to five percent or more, this activity remains in effect. SCCHA and program participants continue to realize the ongoing benefits of this activity.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2017-2: SPECIAL NEEDS POPULATION DIRECT REFERRAL PROGRAM

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2019 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity creates an exception to Section 8 waiting list regulations to create a direct referral program for certain special needs populations who are not best served through a waiting list (such as disabled individuals at risk of institutionalization or transition aged youth). This activity gives SCCHA the flexibility to work directly with community partners to rapidly house and provide supportive services to vulnerable populations.

UPDATE ON MTW ACTIVITY

Working with the Office of Supportive Housing of Santa Clara County, SCCHA housed 39 special needs families units during FY2019.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2017-3: LANDLORD INITIATIVES (& RE-PROPOSED)

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2017 AMENDED: FY2018 & FY2019

DESCRIPTION OF MTW ACTIVITY

This activity originally authorized SCCHA to administer vacancy payments to Section 8 landlords who re-rent their unit to SCCHA program participants.

Implemented in March 2017, SCCHA re-proposed the activity in FY2018 to streamline the process of administering the vacancy payments originally based on 80 percent of the previous contract rent for up to 30 days. Approved by HUD, vacancy payments are now set within the range of \$500 and \$1,500 – an amount that was determined to be reasonable after evaluating the program-wide contract rent average. Moderate Rehabilitation and Project-Based Voucher units vacancy payments remain at 80 percent of the previous contract rent.

Re-proposed again in FY2019, Activity 2017-3 expands the initiatives SCCHA offers landlords to increase and maintain rental units available for Section 8 families. Offering a one-time bonus payment for new landlords between \$500 and \$2,500—based on a program-wide contract rent average, bonus payments provide new owners with an incentive to participate in the HCV program.

This activity increases the number of HCV units that are re-leased to HCV participants, ensuring the long-term viability of units that will be available to HCV low-income tenants and provides an incentive for new owner participation in the HCV program.

UPDATE ON MTW ACTIVITY

SCCHA originally implemented the use of vacancy payments in March 2017 before seeking to streamline the process of administering the payments in FY2018. The expansion of the initiative in FY2019 offering one-time bonus payments to new owners who rent to a Section 8 tenant was implemented in January 2019.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity’s metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes or modifications to this activity and its authorizations during FY2020.

ACTIVITY 2019-2: FAMILY SELF-SUFFICIENCY PROGRAM – WAIVE CONTRACT OF PARTICIPATION REQUIREMENTS

PLAN YEAR APPROVED: FY2019 **IMPLEMENTED:** FY2019 **AMENDED:** N/A

DESCRIPTION OF MTW ACTIVITY

This activity modifies certain aspects of the Family Self Sufficiency (FSS) program to reduce the administrative burdens on both the participant families and SCCHA, while broadening the pool of families who could benefit from the FSS program’s escrow savings account. First, the activity eliminates the requirement in the FSS Contract of Participation (CoP) (HUD Form 52560) that enrolling families must have been subject to an income reexamination within 120 days of the enrollment, and instead uses the family income as determined at the last regular reexamination, which may be up to two years before enrollment for families which are not on fixed incomes. Second, the activity allows the successful maintained employment of any adult member of the enrolled family – rather than just the Head of Household – to count towards the family’s FSS goals. If at least one adult family member completes the Individual Training and Services Plan, the family will be considered a “successful FSS completion” and will receive the escrow payout.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2020.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations during FY2020.

2019-3: WAIVING THE REQUIREMENT THAT A PHA REDETERMINE RENT REASONABLENESS FOR MANUFACTURED HOME SPACES ANNUALLY

PLAN YEAR APPROVED: FY2019 IMPLEMENTED: FY2019 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to eliminate the HUD requirement that a PHA annually re-determine that the current rent to owner is a reasonable rent for rent charged for a manufactured home space. SCCHA continues to perform a full rent reasonableness review at the time of a new contract, owner requested rent changes, tenant request, or when deemed necessary by SCCHA staff.

UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity for manufactured home space rentals in the HCV program.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity's metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020.

2019-4: STREAMLINING THE LEASE UP PROCESS

PLAN YEAR APPROVED: FY2019 IMPLEMENTED: FY2019 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity was designed to alleviate the delays associated with the processing and completion of the Request for Tenancy Approval (RFTA) packet, tenancy addendum, and lease. HUD approved a waiver of 24 CFR §982.162 and §982.308 as necessary to change the requirement of using Form HUD-52517 and to simplify and streamline what constitutes an approvable lease.

SCCHA created a new RFTA form that consolidated certain sections which required owners to input duplicative information. Additionally, SCCHA created a “Mandatory Lease Information” form which acts as an addendum to the owner’s lease agreement. The goal of this form is to save staff time by providing the information HUD requires to be in the owner’s lease on a single page that the tenant and owner will sign and submit along with the lease. This will save staff time because they will no longer need to sift through the entire lease to find the HUD required elements and simultaneously achieve faster approval of the HAP contract for owners.

UPDATE ON MTW ACTIVITY

SCCHA implemented this activity in February 2019.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2020.

PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no changes to the activity’s metrics, baselines, or benchmarks.

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations during FY2020

Activities Not Yet Implemented

2014-1A: FOCUS FORWARD PILOT PROGRAM PART I – CASE MANAGEMENT, INCENTIVES AND ESCROW

PLAN YEAR APPROVED: FY2014 (RE-PROPOSED FY2018)

The Focus Forward Program (FFP) is an expanded version of the traditional FSS program and will support HCV participants in increasing and sustaining a higher level of self-sufficiency. Originally proposed in the FY2014 MTW Plan, SCCHA re-proposed the FFP with a more robust case management and ongoing program-incentives component. The enhanced FFP will promote accountability and motivate participants to pursue higher education, develop 21st century job skills and set/achieve realistic self-sufficiency goals.

SCCHA has issued a Request for Proposal to select a consultant to assist in developing the policies, procedures, case management strategies, and relationships with community partners necessary to implement FFP. SCCHA anticipates selecting a consultant during FY2019 and anticipates the first phases of implementation to take place during FY2020.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

2014-1B: FOCUS FORWARD PART II – TIME LIMIT AND RENT STRUCTURE

PLAN YEAR APPROVED: FY2014 (RE-PROPOSED FY2018)

Families that are currently on the SCCHA waiting list will have the option to enroll in the FFP, with the condition that their assistance will have a ten-year time limit. In addition to the ten-year time limit, and to prepare participants for transitioning off assistance, SCCHA has designed an alternative rent calculation for the FFP in which participants will take on more fiscal responsibility for their rental payments as they progress through the program.

SCCHA has issued a Request for Proposal to select a consultant to assist in developing the policies, procedures, case management strategies, and relationships with community partners necessary to implement FFP. SCCHA anticipates selecting a consultant during FY2019 and anticipates the first phases of implementation to take place during FY2020.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

2014-2: ELIMINATE REQUIREMENT TO REDETERMINE RENT REASONABLENESS WHEN HUD DECREASES FAIR MARKET RENTS (FMRs)

PLAN YEAR APPROVED: FY2014

This activity eliminates the HUD requirement to re-determine the rent reasonableness of affected units within 60 days of the contract anniversary date when HUD reduced FMRs by 10%

or more. SCCHA expects that it will save money on staff time required for FMR analysis, comparison database upkeep, and reexamination processes. SCCHA has yet to implement this activity because HUD has not decreased FMRs since the activity was approved. SCCHA plans to implement this activity upon the event that HUD reduces FMRs by 10% or more.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

2016-1: RESTRICTION ON HEAD OF HOUSEHOLD CHANGES

PLAN YEAR APPROVED: FY2016

This activity encourages self-sufficiency by allowing the Head of Household (HoH) to leave the program and transfer his or her voucher to a remaining non-elderly, non-disabled family member only if that family member joins SCCHA's Focus Forward Program (FFP). The new HoH who enrolls in the pilot FFP may work with assigned case managers and set economic self-sufficiency goals.

This will be implemented when SCCHA implements the FFP. As described in Activities 2014-1A and 2014-1B, SCCHA anticipates the first phases of FFP implementation to take place during FY2020. SCCHA will revise the activity's metrics to include HUD standard metrics SS#6 and SS#7 at that time.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

2017-4: SETTING THE PAYMENT STANDARDS ABOVE 110 PERCENT OF HUD FAIR MARKET RENTS (ORIGINALLY PROPOSED AS ACTIVITY 2017-1)

PLAN YEAR APPROVED: FY2017

This activity provides the flexibility to set SCCHA payment standards higher than 110 percent of the Fair Market Rent (FMR), if necessary, without HUD approval. This activity will give SCCHA participants the ability to be more competitive in the high priced and volatile Santa Clara County rental market.

This activity is intended to increase the probability of participants securing a rental unit in a tight, high-cost rental market. Currently, Santa Clara County is experiencing a stabilizing of the rental market such that SCCHA has not needed to implement this activity. SCCHA may implement this activity when the Santa Clara County housing market experiences another surge in cost.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2020.

2018-1: STRENGTHENING PARTNERSHIPS THROUGH CAPACITY BUILDING

PLAN YEAR APPROVED: FY2018

This activity allows SCCHA to provide funds, not to surpass \$100,000 per fiscal year that can be utilized to support local service providers in building capacity, specifically geared toward service providers that offer family self-sufficiency services (i.e. job readiness programs, educational resources, etc.) to the community. The fund would allocate resources to designated partner agencies that make a commitment to providing services to individuals and families enrolled in SCCHA's pilot Focus Forward Program (FFP).

This activity will be implemented when SCCHA implements the FFP. SCCHA will revise the activity's metrics to include HUD standard metrics SS#5 and SS#8 at that time.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

2019-1: GRADUATION BONUS

PLAN YEAR APPROVED: FY2019

This activity reduces the time a zero HAP participant's assistance is terminated from 180 days to 60 days. In addition, it extends the termination of assistance to families receiving HAP payments of \$99 or less. It also provides a lump sum bonus amount for these families upon termination of assistance. This activity is intended to increase voucher turnover and to provide a financial cushion for graduating families.

This activity is currently on hold pending the re-opening of SCCHA's waiting list. SCCHA anticipates implementing this activity in FY2020 or FY2021.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

Activities On Hold

ACTIVITY 2010-5: ASSISTING OVER-INCOME FAMILIES RESIDING AT SCCHA-OWNED PROJECT-BASED VOUCHER PROPERTIES

This activity waives PBV regulations relating to preference for in-place families who reside in former public housing in order to continue to commit tax-exempt bonds and tax credits to the disposed public housing properties. Families with income below the PBV limit, but above the tax credit limit, will receive Section 8 voucher and relocation assistance. This activity helps maintain the affordability of units that would otherwise become unaffordable to very low-income families by applying tax credits in unison with PBV assistance. It also increases housing choices for low-income families by preserving and improving the affordable housing stock in Santa Clara County.

Since this activity was implemented in 2011, SCCHA has had no need to use this waiver as no families have exceeded the income threshold. Only one public housing project (Deborah Drive) remains that could potentially benefit from this activity and there are no plans at this time to dispose of this property. Therefore, SCCHA has placed this activity on hold indefinitely but could re-implement when the last public housing project is eliminated.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

ACTIVITY 2012-5: EXPAND TENANT SERVICES AT SCCHA- OR AFFILIATE-OWNED AFFORDABLE HOUSING PROPERTIES

This activity, which was implemented in FY2012, allowed SCCHA to use its MTW funding flexibility to expand its provision of programs and services for tenants living in SCCHA- or affiliate-owned non-Section 8/9 affordable rental properties. SCCHA anticipated that tenants would gain some or all of the necessary skills to address daily living requirements, maintain housing, and, for workable residents, possibly re-enter or move up in the work force.

SCCHA placed this activity on hold in FY2016 because the Agency did not (and does not expect to) utilize MTW funds for programs and services expansions at its non-Section 8/9 rental properties. Therefore, there is no implementation timeline. If non-MTW funding sources are exhausted, SCCHA will re-implement this activity.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

ACTIVITY 2014-3: FREEZE ON CONTRACT RENT INCREASES

Implemented in FY2014, this activity imposed a freeze on any owner requested rent increases for one-year effective September 2013 through August 2014. Effective September 1, 2014, SCCHA lifted the freeze and accepted owner requested rent increases again. This activity helped reduce costs by controlling increases to Housing Assistance Payments (HAP) while reducing labor costs but had negative effects on owner retention. Currently, there are no plans to re-implement

this activity. Subsequent freezes on owner requested rent increases are subject to SCCHA's Board of Commissioners' approval and are limited to a one-year term.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

Closed Out Activities

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2009-3 Reduced Frequency of Inspections	Effective July 2014, Public Housing Agencies (PHAs) can inspect units during the term of the Housing Assistance Payment (HAP) contract at least biennially instead of annually. There is no longer a need to waive HUD regulations to conduct biennial inspections.	This activity was closed out in FY2015
2009-4 Timeline to Correct HQS Deficiencies	Handhelds are now utilized by the inspections team at every regularly scheduled inspection. These devices can record the non-life-threatening deficiency directly into the newly implemented software, which then immediately generates the deficiency notification letter. There is no longer a lag time between the date of the inspection and the date of the letter.	This activity was closed out in FY2012
2009-6 20% Sample Inspections Annually for PBV Units	After the approval of this activity, HUD issued PIH Notice 2008-14, in which HUD stipulates that a PHA may now renew or extend Project-Based Certificate Housing Assistance Payment (HAP) contracts as Project-Based Voucher HAP contracts in accordance with the regulations governing the PBV program at 24 CFR Part 983. This activity was never implemented.	This activity was closed out in FY2009
2009-7 Project-Based Unit Substitution	After the approval of this activity, HUD issued PIH Notice 2008-14, in which HUD stipulates that a PHA may now renew or extend Project-Based Certificate Housing Assistance Payment (HAP) contracts as Project-Based Voucher HAP contracts in accordance with the regulations governing the PBV program at 24 CFR Part 983. Therefore, this activity was never implemented.	This activity was closed out in FY2009
2009-10 Selection of SCCHA-Owned Public Housing Projects for PBV without Competition	SCCHA utilizes MTW Activity 2010-4, which allows the Agency to select any of its properties for PBV assistance without a competitive process, including public housing units. Therefore, this activity is no longer necessary.	This activity was closed out in FY2015
2009-12 Adopt Investment Policies	SCCHA's Board of Commissioners annually adopts investment policies in accordance with the California Government Code (CGC) Sections 5922 and 53601. California law, which SCCHA cannot waive, is consistent with and, in fact, more restrictive than the provisions of federal regulations Section 6 (c) (4) of the 1937 Act and 24 CFR 982.156. Therefore, this activity was never implemented.	This activity was closed out in FY2009

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2010-1 Eliminating 100% Excluded Income from the Income Calculation Process	With the publication of PIH Notice 2013-4, issued January 28, 2013, the verification and calculation of 100% excluded income is no longer required. Therefore, SCCHA eliminated this activity in FY2013. This activity saved labor time and costs.	This activity was closed out in FY2013
2012-1 Create Standard Utility Allowance Schedule	Approved and implemented Activity 2014-4, simplifies the rent calculation method also includes the elimination of utility allowances. Because of Activity 2014-4, MTW Activity 2012-1 is no longer necessary and was closed out prior to implementation.	This activity was closed out in FY2013
2015-1 Using UPCS or Local Inspection Standards to Determine Housing Quality Standards	On June 25, 2014, HUD published in the Federal Register that, effective July 1, 2014, "A PHA may comply with the biennial inspection requirement through reliance upon an inspection conducted for another housing assistance program. If a PHA relies on an alternative inspection to fulfill the biennial inspection requirement for a particular unit, then the PHA must identify the alternative standard in its administrative plan." Therefore, this activity was closed without implementation because HUD's directive superseded this activity.	This activity was closed out in FY2015

V. MTW Sources And Uses of Funds

A. ESTIMATED SOURCES AND USES OF MTW FUNDS

i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$19,224
70600	HUD PHA Operating Grants	\$381,523,351
70610	Capital Grants	\$500,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$410
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$125,672
70000	Total Revenue	\$382,168,657

Note 1: Source in Analysis

70600-HUD-PHA Operating Grants - \$381,523,351:

This FDS line represents the sum of the following: (1) Public Housing Operating Subsidy Income \$16,560 and (2) Section 8 MTW Admin Fee & HAP Earned \$381,506,791.

7120+71300+71310+71400+71500 – Other Income \$125,672:

This FDS line represents the sum of the following: (1) Land Leases \$116,000 (2) Ground Leases \$9,072 and (3) Other miscellaneous income \$600.

ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$23,443,253
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$122,158
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$35,840
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$133,592
95000 (95100+95200+95300+95500)	Total Protective Services	\$35,450
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$200,608
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$1,024,896
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$38,900
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$310,659,690
97400	Depreciation Expense	\$68,938
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$335,763,325

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

Net Balance Analysis

For Fiscal Year 2020, the net reserve balance of \$46,405,332 (MTW funding) will be used to fund the following:

- I. **Asset Management (Local Programs) – Transfer of \$1,341,076**
In accordance with Non-Traditional MTW Activity 2012-4, established under Preservation Fund to provide funding for activities that preserve stable, quality affordable housing to people with low and moderate incomes. The transfer of \$1,341,076 is for subsidizing the expenditures of the Asset Management and Other Preservation Activities of qualifying low-income housing units of properties that are owned and operated by SCCHA and/or affiliated entities.
- II. **Activity 2012-3 – Acquisition & Development Funds - \$500k**
SCCHA anticipates the use of \$500k from Public Housing Capital Grant as an additional source to fund the construction cost of the Park Avenue (100 unit) development project.
- III. **Activity 2012-3 – Acquisition & Development Funds - \$5.6M**
SCCHA anticipates the use of \$5.6M to fund a variety of development projects including \$2.5 M for predevelopment of the Bellarmino Place project, \$1.5M for predevelopment of the Alvarado Park project, \$600k for East Santa Clara master planning project and \$1M for predevelopment on Buena Vista Mobile Home Park.

Finally, we request to add balance sheet FDS line items to report capital needs in the total uses of funds. In addition, we note that, in our opinion, depreciation expenses are not required in the Sources and Uses Report because they are not a source of cash; but instead they should have a corresponding FDS line for capital expenditures.

Note 2 – Source Out Analysis

910000 – Total Operating – Administrative \$23,443,253

This FDS line represents operation, administrative and allocated overhead/support department costs.

91810 – Allocated Overhead - \$0

Per conversation with HUD Analyst, Bella Young, in 2014, the Housing Authority is not utilizing the true COCC model. Therefore, we report our Indirect Allocation costs in FDS line 91900 (Other).

96100 – Total Insurance Premiums - \$200,608

This FDS line consists of \$42k liability insurance, \$156k worker's compensation insurance and \$3k for other insurance.

96000 – Total Other General Expenses - \$1,024,896

This FDS line is comprised of (1) \$924k compensated absences (vacation/sick) (2) \$84k admin fee port out (3) \$2k payment in Lieu of Taxes and (4) \$15.5k in property taxes.

97300 + 97350 – Housing Assistance Payments + HAP Portability-In - \$310,659,690

This FDS line represents the total HAP paid out. HAP Portability – Not budgeted in FY2020 as SCCHA is absorbing all future incoming portability.

iii. Description of Planned Use of MTW Single Fund Flexibility

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

The MTW Agreement allows SCCHA to combine public housing operating and capital funds, including development and Replacement Housing Factor (RHF)/Demolition and Disposition Transition Fund (DDTF) funds, provided under Section 9, and tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide funding source.

In FY2020, SCCHA plans to continue to use MTW Single Fund Flexibility to pay for housing search services for participants who are experiencing challenges in finding a rental unit. The Agency also plans to pursue several projects led by our Information Technology Department, such as setting up a SharePoint system, upgrading our scanning systems and expanding e-signature capabilities.

The Agency is in a limited launch of its new Section 8 tenant application software and expects to fully launch this time saving tool for its clients in late FY2019. In addition, SCCHA is in the initial stages of re-opening our waiting list, which will expand the tenant application to Section 8 applicants. This part of the app will likely be ready for use in FY2020.

B. LOCAL ASSET MANGEMENT PLAN

i. Is the MTW PHA allocating costs within statute?

Yes

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

No

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

No

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

SCCHA does not have a Local Asset Management Plan.

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

N/A

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

No

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

VI. Administrative

A. BOARD RESOLUTION ADOPTING THE FY2020 ANNUAL MTW PLAN AND CERTIFICATIONS OF COMPLIANCE

The SCCHA Board Resolution adopting the FY2020 MTW Plan and the Certifications of Compliance from the County of Santa Clara and the City of San José are attached as **Appendix One** to this plan.

B. CERTIFICATION OF PAYMENTS

SCCHA has attached signed copies of the Certification of Payments (HUD-50071) as **Appendix Two** to this Plan.

C. DISCLOSURE OF LOBBYING ACTIVITIES

SCCHA has attached signed copies of the Disclosure of Lobbying Activities (SF-LLL) as **Appendix Three** to this Plan.

D. DOCUMENTATION OF THE PUBLIC PROCESS FOR THE FY2020 ANNUAL MTW PLAN

SCCHA's FY2020 MTW Annual Plan was made available for public review from February 25, 2019 through March 26, 2019. In addition to SCCHA's regular Board of Commissioner's Meetings, where the public may comment on the MTW plan, two MTW Plan stakeholders' meetings were held between October 2018 and December 2018. A total of 7 people attended these stakeholder meetings. The public hearing for the plan was held on March 14, 2019. No individuals attended, and no written comments were received.

E. PLANNED AND ONGOING EVALUATIONS OF SCCHA'S MTW DEMONSTRATION

In FY2020, SCCHA will continue to refine its approach to data gathering and monitoring of MTW activities and their impacts on stated goals and objectives. SCCHA is exploring a full-scale study and evaluation of its MTW activities.

Appendix One: Resolution No. 19-04

RESOLUTION NO. 19-04

**RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE
SANTA CLARA COUNTY HOUSING AUTHORITY
APPROVING SUBMISSION OF THE FY2020 MOVING TO WORK (MTW)
ANNUAL PLAN TO US DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT**

WHEREAS, the Housing Authority of the County of Santa Clara, together with the Housing Authority of the City San José (collectively referred to as "**SCCHA**"), each entered into a ten-year Moving To Work (**MTW**) Agreement with the U.S. Department of Housing and Urban Development (**HUD**) in 2008, which was extended by HUD to June 30, 2028; and

WHEREAS, as a Moving to Work Agency, SCCHA is required to prepare and submit an Annual MTW Plan (**Plan**), to solicit comments and conduct a public hearing on the Plan, and to make certain certifications; and

WHEREAS, currently in its eleventh year in the MTW Program, SCCHA has drafted its FY2020 Moving to Work Annual Plan, solicited public comment and conducted a public hearing on the Plan; and

WHEREAS, the Board has reviewed the Plan, comments received and required certifications;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Santa Clara County Housing Authority hereby:

1. Certifies the statements in the attached Certifications of Compliance with Regulations; and
2. Approves the Fiscal Year 2020 Moving to Work Annual Plan for SCCHA; and
3. Authorizes SCCHA to submit the FY 2020 MTW Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both agencies.

PASSED AND ADOPTED by the Board of Commissioners of the Santa Clara County Housing Authority, State of California, on April 4, 2019, held at 505 W. Julian Street, City of San Jose, State of California, upon motion from Commissioner

William Anderson and seconded by

Commissioner Elizabeth Gardner with the following vote:

AYES: Chair Loving, Vice Chair O'Neal, Commissioner Anderson,

NAYS: Commissioner Espinoza-Howard, Commissioner Gardner

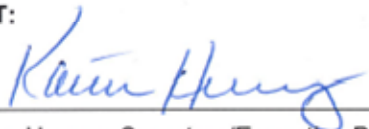
ABSTAIN: Commissioner Lawton

ABSENT:



Jennifer Loving, Chair

ATTEST:



Katherine Harasz, Secretary/Executive Director

APPROVED AS TO FORM AND LEGALITY:



Valerie J. Armento, General Counsel

Attachment: Certifications of Compliance with Regulations:
Board Resolution to accompany the Annual Moving To Work Plan for
the Santa Clara County Housing Authority (CA059) and
the Housing Authority of the City of San José (CA056).

Appendix One: Resolution No. 19-08

RESOLUTION NO. 19-08

RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SANTA CLARA COUNTY HOUSING AUTHORITY APPROVING SUBMISSION OF THE AMENDED FY2020 MOVING TO WORK (MTW) ANNUAL PLAN TO US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the Housing Authority of the County of Santa Clara, together with the Housing Authority of the City San José (collectively referred to as **SCCHA**), each entered into a ten-year Moving To Work (**MTW**) Agreement with the U.S. Department of Housing and Urban Development (**HUD**) in 2008, which was extended by HUD to June 30, 2028; and

WHEREAS, as a Moving to Work Agency, SCCHA is required to prepare and submit an Annual MTW Plan (**Plan**), to solicit comments and conduct a public hearing on the Plan, and to make certain certifications; and

WHEREAS, currently in its eleventh year in the MTW Program, SCCHA submitted its initial FY2020 MTW Annual Plan to HUD on April 4, 2019 and HUD approved the plan on July 11, 2019 for implementation; and

WHEREAS, SCCHA has proposed an amendment to its approved FY2020 MTW Annual Plan seeking HUD approval to implement one new activity to help retain participating owners and implement essential changes to a re-proposed activity to ensure its successful future development and implementation;

WHEREAS, SCCHA's strategic objective of maximizing Moving to Work flexibility will be served by proposing an amendment to the approved FY2020 Plan rather than waiting to include the proposed activities in SCCHA's FY2021 MTW Plan;

WHEREAS, SCCHA solicited public comment and conducted a public hearing on the proposed Amended FY2020 Plan, and otherwise satisfied all HUD requirements for submitting an amended Plan for approval; and

WHEREAS, the Board has reviewed the proposed Amended FY2020 Plan and comments received;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Santa Clara County Housing Authority hereby:

1. Approves the proposed Amended FY2020 Moving to Work Annual Plan for SCCHA; and
2. Authorizes SCCHA to submit the proposed Amended FY2020 MTW Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both agencies.

PASSED AND ADOPTED by the Board of Commissioners of the Santa Clara County Housing Authority, State of California, on August 1, 2019, held at 505 W. Julian Street, City of San Jose, State of California, upon motion from Commissioner

Bill Anderson and seconded by
Commissioner Denis O'Neal with the following vote:

AYES: Chair Loving, Vice Chair O'Neal, Commissioner Russell, Commissioner Lawton,
Commissioner Espinoza-Howard, Commissioner Gardner, Commissioner Anderson,

NAYS: ϕ

ABSTAIN: ϕ

ABSENT: ϕ




Jennifer Loving, Chair

ATTEST:



Katherine Harasz, Secretary/Executive Director

APPROVED AS TO FORM AND LEGALITY:



Valerie J. Armento, General Counsel

Attachment:

Amended FY2020 Annual Moving to Work Plan for the Santa Clara County Housing Authority (CA059) and the Housing Authority of the City of San José (CA056).

Appendix One: Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE	
<p align="center">U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p align="center">Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</p>	
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning July 1, 2019, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p>	
<ol style="list-style-type: none"> (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment. (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan. (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD). (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located. (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan. (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91. (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975. (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing. (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135. (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F. 	

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

Santa Clara County Housing Authority
MTW PHA NAME

CA-059
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).

Jennifer Loving
NAME OF AUTHORIZED OFFICIAL

Chair, Board of Commissioners
TITLE


SIGNATURE

4/4/19
DATE

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

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

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning **July 1, 2019**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

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

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

Housing Authority of the City of San José
MTW PHA NAME

CA-056
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).

Jennifer Loving
NAME OF AUTHORIZED OFFICIAL

Chair, Board of Commissioners
TITLE


SIGNATURE

4/4/19
DATE

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

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

County of Santa Clara

Office of Supportive Housing

3180 Newberry Dr. Suite 100
San Jose, CA 95118
(408) 793-0550 Main
(408) 266-0124 Fax



February 22, 2019

Katherine Harasz, Executive Director
Santa Clara County Housing Authority
505 W. Julian Street
San Jose, CA 95110

RE: FY2020 Moving to Work Plan Certification of Compliance

Dear Mrs. Harasz:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2020 Moving to Work MTW Plan as drafted is consistent with the direction of the Urban County of Santa Clara 2015-2020 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2020 MTW Plan activities and objectives are consistent with the five-year goals of the Urban County of Santa Clara 2015-2020 Consolidated Plan in the efforts to:

1. Assist in the creation and preservation of affordable housing opportunities for low income and special needs households.
2. Support activities to end homelessness.
3. Support activities that provide community services to low income and special needs households.
4. Support activities that strengthen neighborhoods.
5. Promote fair housing choice.

Please feel free to contact me via email at Consuelo.Hernandez@hhs.sccgov.org should you have any questions or require additional information.

Sincerely,

Consuelo Hernandez, AICP
Housing and Community Development Division Director

Board of Supervisors: Mike Wasserman, Dave Cortese, Ken Yeager, S. Joseph Simitian, Cindy Chavez
County Executive: Jeffrey V. Smith



Department of Housing
JACKY MORALES-FERRAND, DIRECTOR

February 28, 2019

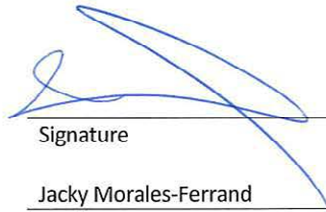
RE: FY2020 Moving to Work Plan Certification of Compliance

To the Santa Clara County Housing Authority:

I/we hereby certify that the Santa Clara County Housing Authority's Fiscal Year (FY) Moving to Work (MTW) Plan as drafted is consistent with the direction of the City of San José's 2015-2020 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2020 MTW Plan activities and objectives are consistent with the five-year goals of the City of San José's 2015-2020 Consolidated Plan in the efforts to:

1. Increase and preserve affordable housing opportunities.
2. Respond to homelessness and its impacts on the community.
3. Strengthen neighborhoods.
4. Promote fair housing.


Signature

Jacky Morales-Ferrand
Print Name

Director
Title

February 28, 2019
Date



Appendix Two: Certification of Payments (HUD 50071)

Certification of Payments to Influence Federal Transactions

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

CA056 Housing Authority of the City of San Jose
Applicant Name

Section 8 Housing Choice Voucher
Program/Activity Receiving Federal Grant Funding

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Name of Authorized Official

Katherine Harasz

Title

Executive Director

Signature

Katherine Harasz

Date (mm/dd/yyyy)

10/31/2018

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

**Certification of Payments
to Influence Federal Transactions**

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

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

CA059 Santa Clara County Housing Authority
Applicant Name

Section 8 Housing Choice Voucher Program
Program/Activity Receiving Federal Grant Funding

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Name of Authorized Official

Katherine Harasz

Title

Executive Director

Signature

Katherine Harasz

Date (mm/dd/yyyy)

10/31/2018

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Appendix Three: Disclosure of Lobbying Activities (SF-LLL)

DISCLOSURE OF LOBBYING ACTIVITIES

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

Approved by OMB
0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant N/A c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award N/A c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: N/A year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Housing Authority of the City of D-20th San Jose D-19th 505 West Julian St. D-18th San Jose CA, 95110 D-17th Congressional District, if known:			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known:		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: N/A CFDA Number, if applicable: _____		
8. Federal Action Number, if known: N/A			9. Award Amount, if known: \$ N/A		
10. a. Name and Address of Lobbying Registrant <i>if individual, last name, first name, MI):</i> Fennel Consulting, LLC 101 Constitution Avenue, NW Suite 800 Washington, DC 20001			b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Fennel, Melody Simpson, William B. Preston, Michael		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Karen Hing</u> Print Name: <u>Katherine Hing</u> Title: <u>Executive Director</u> Telephone No.: <u>408-993-2903</u> Date: <u>10-31-18</u>		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant N/A <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award N/A <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: N/A year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Santa Clara County Housing Authority D-20th 505 West Julian St. D-19th San Jose CA, 95110 D-18th D-17th Congressional District, if known: _____			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known: _____		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: N/A CFDA Number, if applicable: _____		
8. Federal Action Number, if known: N/A			9. Award Amount, if known: \$ N/A		
10. a. Name and Address of Lobbying Registrant <i>If individual, last name, first name, MI):</i> Fennel Consulting, LLC 101 Constitution Avenue, NW Suite 800 Washington, DC 20001			b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Fennel, Melody Simpson, William B. Preston, Michael		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the filer above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Katherine Harasz</u> Print Name: <u>Katherine Harasz</u> Title: <u>Executive Director</u> Telephone No.: <u>408-993-2903</u> Date: <u>10.31.18</u>		
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