



FY2022 Moving to Work Annual Plan

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

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FY2022 Moving to Work 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.

Serving residents throughout Santa Clara County, the heart of Silicon Valley and part of the greater San Francisco Bay Area, our clients include families with children, seniors, veterans, the disabled and the formerly homeless. The vast majority of our client households are extremely low-income (30% of area median income or less) with half of our assisted households occupied by seniors. **SCCHA currently assists over 19,000 households.**

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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 2022 (FY2022) from July 1, 2021 through June 30, 2022. 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:

DECREASE	administrative costs and increase cost effectiveness in housing program operations;
PROMOTE	participants' economic self-sufficiency; and
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.

The FY2014-FY2019 Strategic Plan expired on June 30, 2019. SCCHA began the process of creating the successor Strategic Plan in early 2019. Every SCCHA employee was given the chance to weigh in on the new guiding principles for the agency, as well as the Board of Commissioners, tenants, and landlords. The new FY2020-FY2025 Strategic Plan was approved by the Board of Commissioners and adopted August 1, 2019.

While SCCHA's mission and vision remained the same, the new Strategic Plan shifted focus to goals in the areas of housing availability, agency partnerships, and operational excellence. The goals and objectives of the new Strategic Plan are:

Housing Availability & Affordability

Goal 1. Increase the number of and equitable access to housing opportunities for low-income Santa Clara County residents

Objective 1.1: Develop new affordable housing, including extremely low-income (ELI) and permanent supportive housing.

Objective 1.2: Leverage varied sources of public and private funding to support financial feasibility of Housing Authority projects.

Objective 1.3: Enable voucher holders to easily and efficiently locate housing.

Objective 1.4: Manage rental subsidies offered by the Housing Authority to increase the number of families served.

Goal 2. Preserve the existing housing opportunities available to low-income Santa Clara County residents to counter displacement of those who are most impacted by Santa Clara County's income disparity and housing crisis.

Objective 2.1: Preserve the Housing Authority's existing affordable housing portfolio.

Objective 2.2: Support efforts to preserve other affordable housing in Santa Clara County.

Objective 2.3: Maintain and increase the number of landlords participating in the Housing Authority's voucher programs.

Partnerships

Goal 3. Build strong partnerships that promote better outcomes for those in need of maintaining, affording or securing housing

Objective 3.1: Partner with local governments and non-profits to provide services for target populations and promote resident self-sufficiency

Objective 3.2: Establish an understood network of service providers to connect those in need with safety net services

Objective 3.3: Partner with key stakeholders to promote and advocate for innovative housing policies and additional affordable housing resources

Objective 3.4: Understand and address the needs of low and extremely low-income individuals and how the Housing Authority's federal and local programs can best help them to be self-sufficient

Operational Excellence

Goal 4. Maximize agency fiscal health, efficiency and effectiveness by streamlining processes, adopting technology and embracing innovation

Objective 4.1: Promote an organizational culture and work environment that supports staff professional development and personal excellence

Objective 4.2: Attract, develop and retain a skilled, engaged and collaborative staff

Objective 4.3: Monitor and enhance the customer experience of the Housing Authority's clients and stakeholders

Objective 4.4: Increase the efficiency and effectiveness of internal processes through technology, staff training and development

Objective 4.5: Maintain the Housing Authority's fiscal health and integrity

Using the Strategic Plan as a compass, SCCHA is pursuing strategies within FY2022 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 2022

SCCHA last opened its waiting list in 2006, where over 50,000 applicants completed paper or on-line applications to register. Currently there are approximately 1,300 applicants remaining on the waiting list. SCCHA replaced the HCV waiting list in December 2020 with an always-open HCV "interest list" and will transition to the interest list once the 2006 waiting list is exhausted. Interest list applicants only need to log-in to their online profile once per year on a computer or smart phone in order to remain on the interest list. New vouchers, when released by the Housing Authority, will go to active interest list registrants who are chosen by random lottery. This new system will be fair to all applicants and provide hope of obtaining housing assistance without the prospect of a decade or longer wait.

SCCHA's Project-Based Voucher (PBV) and Moderate Rehabilitation program properties were also included in the development of the online interest list. Rather than maintaining one PBV or Mod Rehab waiting list for all projects, applicants now have the choice to sign up for the site-based interest list of specific properties. Applicants can view project information, including amenities and accessibility information, empowering them to decide what sites would work best for them and their families.

As vacancy rates continue to remain very low in Santa Clara County, SCCHA continues to monitor the housing success rates for families shopping with Housing Choice Vouchers and support them through housing search assistance if they are unable to find a new home within the first 120 days of their shopping voucher.

Santa Clara County has 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, \$700 million of which is 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 FY2021, SCCHA will have awarded or conditionally awarded 803 Moving-to-Work PBVs and 89 HUD-VASH PBVs (in conjunction with the Veterans Affairs Palo Alto Health Care System) to Measure A projects. Several Measure A projects, such as the Veranda in Cupertino, Villas on the Park in San Jose, and Crossings on Monterey in Morgan Hill have already completed construction, with the rest expected to complete construction in the remainder of FY2021, FY2022, and FY2023.

SCCHA's housing development partners provide hope for the future by actively creating new housing dedicated to alleviating homelessness. New affordable housing projects are currently under construction throughout the County. The properties leasing up in FY2022 have all been awarded funds under Santa Clara County's Measure A housing referendum, which targeted almost \$1 Billion in bonds for the development of affordable housing in the County. SCCHA's partnership with the County will provide PBVs at the following projects in FY2022:

- Quetzal Gardens will house chronically homeless individuals and families through the use of 28 PBVs. An additional 4 PBV units will be filled by families from SCCHA's Waiting List.
- Iamesi Village (formerly North San Pedro Apartments) will be a 100% PBV project with 60 units set aside for chronically homeless and 49 for VASH participants.
- Calabazas Community Apartments is a 136-unit new construction project in Santa Clara, California, which will house tenants at 30% and 40% of AMI. 80 of the units will be supported with PBVs, set aside for the chronically homeless.

In addition to these projects, SCCHA issued a separate Request for Proposals for projects to be supported with PBVs for 2-bedroom or larger units. SCCHA conditionally awarded 200 PBVs through this RFP to projects expected to finish construction in FY2022 and FY2023. SCCHA conditionally awarded 140 PBVs for six projects located in San Jose, 8 for a project in Santa Clara, and 52 for two projects in Sunnyvale.

SCCHA's Development Team is busy developing its own affordable housing. Predevelopment and financing efforts continue on Alvarado Park Senior Housing and Bellarmino Place Family Housing. The adjacent developments, purchased with \$12 million in MTW funds, will provide 89 affordable units for seniors and 115 affordable units for families in an amenity rich neighborhood in San

José. The developments will each include units for the most vulnerable in our community, including extremely low-income households and those requiring permanent supportive housing.

MTW funds in the amount of \$30 million were used to acquire property on East Santa Clara Street. This property will be home to hundreds of multi-family affordable housing units and open space green areas. Design development will continue into FY2022 and MTW funds will be used to pursue necessary land use approvals.

SCCHA is continually striving to improve the agency's efficiency, and to meet staff's ongoing technological needs. The agency is enhancing the usability of its Tenant Portal, a mobile application for Section 8 tenants launched in 2019 that facilitates information requests, submission of documents, and communications with Housing Authority staff. The agency is also in the design process for a new digital tool, "SCCHA 2.0". SCCHA 2.0 will be a comprehensive digital communication, client interface, document management, task management, and oversight system utilized by both agency staff and clients. SCCHA 2.0 will centralize all incoming requests and documents (whether transmitted in person, online, via fax, or by mail), as well as digitizing and logging transactions for better task management. The goal of SCCHA 2.0 will be to create transparency in agency operations, so that clients can have trust in SCCHA, and to better manage the voluminous amount of documents, communications, and tasks inherent in running a large social services program.

SCCHA's Finance Team continues to aggressively safeguard the agency's fiscal health. In FY2022, the Finance Team is seeking to develop a comprehensive procedure manual to standardize all finance functions, implement a specialized job cost module for construction and development activities, and obtain the latest technology to improve the effectiveness and efficiency of financial processes.

The agency has also outgrown the office it has occupied since 1988. For several years now, the current office has been insufficient to meet both staff and client needs, and the agency had been planning to construct a new office building on the East Santa Clara Street property. However, staff determined that this option would not be optimal in terms of cost and time. Therefore, in FY2021, SCCHA purchased new office space just north of downtown San Jose which will provide space for both current and future needs. SCCHA expects to move into the new office in early- to mid- Calendar Year 2023.

To conclude, SCCHA's continuing priorities are to ensure that its affordable housing and voucher programs operate in an efficient and effective manner. To serve those priorities, SCCHA proposes a total of seven (7) activities in this Plan (three re-proposals of previously approved activities and four new proposals). The activities are in large part focused on increasing cost effectiveness within the Agency and increasing housing choices for low-income families:

❖ **Re-Propose Activity 2016-01: Restriction on Head of Household Changes**

This activity, as originally approved in the FY2016 Plan, applied to cases where a Head of Household leaves Section 8 assistance and transfers his or her voucher to a remaining family

member. These transfers typically occur when the Head of Household has a higher income and no longer requires the assistance but wants to pass on their voucher to a younger family member who has no or low income (referred to as a 'legacy' transfer). The activity required participation in the Family Self Sufficiency (FSS) program for the new Head of Household.

The Re-Proposed activity will clarify that the new Head of Household must enroll in the new, 10-year time-limited Focus Forward Program (FFP). This will support participants' development of economic self-sufficiency and enable the Housing Authority to serve more families. Hardship clauses will exempt certain families from this activity such as when the current Head of Household leaves due to family break-up or when the remaining family member(s) has/have minor children.

(MTW Statutory Objectives: Increase Cost Effectiveness, Increase Housing Choices, and Increase Self-Sufficiency)

❖ **Re-Propose Activity 2019-01: Graduation Bonus**

The original approved Activity 2019-01 changed these requirements in three ways:

- The threshold housing assistance level was changed from \$0 to \$99;
- The 180-day time period for program termination was changed to 60 days; and
- Upon termination from the Section 8 program, the family would receive a Graduation Bonus payment.

SCCHA's re-proposal of this Activity revises the activity threshold from a fixed dollar amount of the family's monthly rent portion to a threshold based on the family's total annual income. SCCHA plans to re-propose the activity so that Section 8 households whose annual income reaches 80% or greater of Area Median Income (AMI) will be paid the Graduation Bonus and removed from the Section 8 program after 60 days. This will increase voucher turnover, allowing SCCHA to serve more families, and allow SCCHA to provide more assistance to needier families. This change will also align the activity with the Family Self-Sufficiency Program and the Focus Forward Program (expected to be launched in 2021) in that both of those programs identify program graduates as households earning 80% or more of the Area Median Income.

(MTW Statutory Objectives: Increase Housing Choices & Increase Self-Sufficiency)

❖ **Re-Propose Activity 2020-05: Eliminate the 40% of Income Cap at Initial leasing**

Before the COVID-19 pandemic, HUD regulations prevented participants from entering into a lease with a landlord if the family would pay more than 40% of their monthly income toward rent. As part the COVID-19 temporary HUD waivers, SCCHA lifted the monthly rent limit at initial leasing of a unit from 40% to 50% of a family's monthly income. The agency included the new 50% cap as a technical amendment in the FY2020 MTW Plan to sunset the activity on June 30, 2021, unless they make the activity permanent. SCCHA proposes to make the 50% limit permanent in the FY2022 MTW Plan. In the expensive Bay Area housing market, many unassisted families pay more than 40% of their monthly income towards rent. The old 40% cap in some cases made it more difficult for our families to find housing. Since SCCHA implemented the temporary MTW activity through December 31, 2020, 165 families were

able to lease a unit that they would not have been able to under HUD regulations. The activity will be an optional choice for families and SCCHA will advise voucher holders to look for and rent units they can afford.

(MTW Statutory Objective: Increase Housing Choices)

❖ **Homeownership and Asset Limitations for Eligibility (2022-01)**

This activity would, with certain exceptions, make the following households ineligible for Section 8 program participation with SCCHA:

- Families who own and have a legal right to occupy a home in the Bay Area or neighboring counties; and
- Families who have \$100,000 per family member or more in assets.

This activity would allow SCCHA to direct its limited resources to those who are neediest. The following Bay Area and neighboring counties are included in this activity: Alameda, Contra Costa, Marin, Merced, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, San Benito, Solano, and Stanislaus. As of December 31, 2020, 14 current participants own property located in one of these counties. These homeowners would not be impacted by the activity but future applicants who own homes in any of the above listed counties would be denied assistance if the activity is approved.

The asset limitation is also being proposed for similar reasons; even in the expensive Bay Area, \$100,000 per family member is a significant amount of resources and denying assistance to these higher-asset families allows SCCHA to better target its resources.

(MTW Statutory Objective: Increase Cost Effectiveness)

❖ **Waive Full-Time Student Income Exclusion for Families Which Earn 80% or More of Area Median Income (2022-02)**

For families which earn 80% or more of AMI, this activity would allow SCCHA to count 100% of the income of program participants who qualify as full-time students. Current HUD regulations require SCCHA to only count \$480 of the income of full-time students, regardless of how much their family earns. This has led to some outlier cases where people who earn more than six figures qualify as full-time students, while only \$480 of their salary counts towards SCCHA's income calculation. Eliminating this exclusion will allow SCCHA to better target its resources towards the neediest families.

(MTW Statutory Objective: Increase Cost Effectiveness and Increase Housing Choices)

❖ **Mainstream Turnover Voucher Issuance Flexibility (2022-03)**

This activity would increase SCCHA's flexibility in issuing Mainstream vouchers, which are special vouchers set aside for non-elderly persons with disabilities. SCCHA was awarded 190 new Mainstream vouchers since 2018 with a preference for those who are homeless, institutionalized, or at risk of homelessness or institutionalization according to the strict HUD definitions. The Notice of Funding Availability for these vouchers encouraged public housing agencies to work with partner agencies in their jurisdiction, especially the agency responsible for the local Continuum of Care to receive referrals of the applicants who meet these

preferences. When SCCHA was awarded these vouchers, it entered in an agreement with the Santa Clara County Office of Supportive Housing to make referrals of eligible applicants and provide case management for these clients. However, for turnover vouchers, a recent HUD notice requires that the vouchers be issued to qualified families on SCCHA's waiting list. SCCHA staff are not best suited to verify and document whether waiting list applicants with a family member with disabilities meet the HUD definitions of homelessness, at risk of homelessness, or are institutionalized or at risk of institutionalization. Staff are therefore seeking to continue to partner with and accept Mainstream referrals from its partner agency, for both new and turnover Mainstream vouchers.

(MTW Statutory Objectives: Increase Housing Choices)

❖ **Modified PBV Contract Rents (2022-04)**

24 CFR §983.301(b) requires housing authorities to set the contract rents of Project Based Voucher (PBV) units to the lowest of:

1. 110% of the Fair Market Rent (FMR) minus any applicable utility allowance;
2. The reasonable rent; or
3. The owner-requested rent.

For high-cost areas, this regulation essentially allows PBV project owners to consistently have contract rents set at 110% of the FMR, which is usually much higher than the rents allowed under the tax credit program. This means that some projects, over the years and decades of receiving PBV assistance, will receive much more rental revenue (in some cases millions of dollars more) than they need.

This activity would allow SCCHA to set PBV contract rents at a lower amount than the three amounts identified above. SCCHA staff are working with the same consultant who created the PBV Underwriting Tool for right sizing PBV project proposals to determine the best amount at which to set PBV contract rents. It will meet with local affordable housing developers to review the proposed activity and obtain feedback from them in crafting the policy.

(MTW Statutory Objectives: Increase Self-Sufficiency & Cost Effectiveness)

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 five-year 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.

Santa Clara County is in the midst of a well-publicized affordable housing crisis. This need is demonstrated by the overwhelming voter approval of \$950 million in Measure A bond funds that will be committed to the development of affordable housing, the bulk of the funds are for the development of housing affordable to extremely low-income households and for permanent supportive housing. As described earlier, SCCHA partnered with the County of Santa Clara by providing Section 8, HUD-VASH, and Mainstream Program PBVs for developers seeking Measure A bond funds. Attaching vouchers to the Measure A development funds ensures that units will be affordable for the County’s vulnerable populations, and that new construction properties will have sufficient and 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.

SCCHA will continue 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 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.

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	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; and FY2021)	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

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	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
2009-8**	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		
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		

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	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
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 Initiatives			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	
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
2020-1	Increase Percentage of Project based Vouchers (PBV)			X
2020-2	Interim Housing			X

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	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
2020-3	Over Housed/Under Housed Project Based Voucher (PBV) Households			X
2020-4	Rent to Owners & Rent Reasonableness			X
2020-5	Eliminate the 40% of Income Cap at Initial Leasing			X
2021-1*	Impose Limits on PBV to HCV Conversion	X		X
2021-2*	Simplify Minimum Rent Hardship Exemption	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
777 West San Carlos	16	No	New construction project consisting of both family and special needs units. Of the 154 total units, 16 family units will be supported by PBVs.
961 Meridian	38	No	New construction family and veterans project. 38 family units will be supported with MTW PBVs, while 35 veterans units will be supported with HUD-VASH PBVs.
Auzerais	64	No	New construction family project consisting of 128 total units. 64 PBVs will support the project, directed toward the homeless and those with special needs.
Bascom	7	No	New construction project consisting of 90 total units. 7 family units will be supported with PBVs.
Charities 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.
Charities Keyes	24	No	New construction project consisting of 82 total units. 25 family units will be supported with PBVs.
Dupont	35	No	New construction project consisting of 141 total units. 35 family units will be supported with PBVs.
EAH Blossom Hill	6	No	New construction project consisting of 84 total units. 6 family units will be supported with PBVs.
Monroe Street	8	No	New construction project consisting of 65 total units. 8 family units will be supported with PBVs.
Roosevelt Park	20	No	New construction project consisting of 80 total units. 20 family units will be supported with PBVs.
Sango Court	40	No	New construction family project consisting of 101 total units. 40 PBVs will support the project, directed toward the homeless and those with special needs.
Sonora Court	30	No	New construction family project consisting of 177 total units. 30 family units will be supported with PBVs.
Sunnyvale Block 15	90	No	New construction project consisting of 90 total units. 22 family units will be supported with PBVs.

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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
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.
4 th and Younger	93	Committed	No	New construction permanent supportive housing project with 93 PBVs for the chronically homeless.
750 West San Carlos Housing	40	Committed	No	New construction family project consisting of 80 total units. 40 PBVs will support the project, directed towards those with special needs.
Agrihood Senior Apartments	54	Committed	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.
Anne Way Residence	4	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.
Calabazas	80	Leased/Issued	No	New construction family project consisting of 136 units. 80 PBVs will support the project, directed toward the homeless and those with special needs.
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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.
Crest Avenue Apartments	4	Leased/Issued	Yes	RAD conversion of former Mod Rehab project with four 2-bedroom units.
Crossings on Monterey	20	Leased/Issued	No	Family, new construction project, consisting of 39 units (6, 1-bedroom, 18, 2-bedroom and 15, 3-bedroom). PBV units are for chronically homeless families.
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.
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Eagle Park	16	Leased/Issued	No	14 Studio and 2 1-bedroom units. PBVs are for the chronically homeless and those with special needs.
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	10	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.
Gallup & Mesa	23	Committed	No	New construction family project consisting of 45 total units. 23 PBVs will support the project, directed toward the homeless and those with special needs.
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.
Iamesi Village (North San Pedro Apartments)	60	Leased/Issued	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.
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	Leased/Issued	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.
Markham Plaza I (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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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.
Monterey Gateway	37	Leased/Issued	No	Senior, new construction project, consisting of 75 units (64, 1-bedroom and 11, 2-bedroom). PBV units are for chronically homeless and homeless seniors.
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.
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.
Orchard Ranch (Palomino)	18	Leased/Issued	No	Family, new construction project, consisting of 18 total units. PBVs units are for large families, those

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				with special needs, and chronically homeless families
Orchard Ranch (Overo)	8	Leased/Issued	No	Family, new construction project, consisting of 8 units. PBVs are for those at risk of homelessness
Orchard Ranch (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
Page Street	27	Committed	No	New construction family project consisting of 81 total units. 27 PBVs will support the project, directed toward the homeless and those with special needs.
Park Avenue Senior Housing	99	Leased/Issued	No	Senior, new construction, 94 1-bedroom, 5 2-bedderoom. 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	Leased/Issued	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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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
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
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	Leased/Issued	No	Family, new construction project, consisting of 61 total units. 20 PBVs for those at risk of homelessness.
Sobrato Apartments	40	Leased/Issued	No	Existing project with 40 PBVs for chronically homeless families.
Stevenson House	10	Leased/Issued	No	Senior project consisting of 120 studio and 1-bedroom units. PBV units (6 studio and 4 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
Tyrella Gardens Apartments	11	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.
Vela Apartments (Alum Rock Family Housing)	29	Committed	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.
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.
Westwood Ambassador	10	Leased/Issued	Yes	10 PBVs units for former Mod Rehab project.
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.

2,753

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 acquired 2.3 acres of land on Race Street in San José, utilizing \$12 million in MTW funds. Two projects are planned at this site, Alvarado Park Senior Housing that includes 89 affordable units that targets seniors and Bellarmino Place Family Housing comprised of 115 affordable units for families. SCCHA anticipates that the design documents and financing plan will be final by the end of FY2022.

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 be home to at least four affordable housing developments providing hundreds of multi-family affordable housing units. Design development will continue in to FY2022 and MTW funds will be used in pursuing necessary land use approvals.

Approximately \$5 million of MTW funds will be used for the rehabilitation of 20 units at San Pedro Gardens Apartments, \$9.9 million for the refinancing of a City of San José loan and upgrade the HVAC System for El Parador Apartments, \$100k to cover the operating deficit and the repairs of façade and parking structure for Deborah Drive, and \$650k for addressing a water leaking issue at Helzer Court Apartments. Approximately \$2 million of MTW funds will be spent for a refinance of the DeRose Garden Apartments, in addition to the approximately \$11 million spent to purchase the project in FY2021.

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^	14,064	1,172
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	215,412	17,951

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 Preservation Fund for SCCHA and Affiliate-Owned Properties/Activity 2012-4	14,112	1,176
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 FY2020, SCCHA increased its voucher payment standards for SRO, one-bedroom and two-bedroom units and continued landlord recruitment and retention efforts. SCCHA continues 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 250 MTW PBV units will finish construction in FY2022.
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	685	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific	1,326	Closed	Yes
Project-Based, Local, Non-Traditional MTW Housing Assistance Program	Site Based	2,542	Partially Open	Yes

Please describe any duplication of applicants across waiting lists:

SCCHA has 13 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: 99 for DeRose Gardens Apartments, 25 for El Parador Apartments, 136 for San Pedro Gardens Apartments, 79 for Pinmore Gardens Apartments, 124 for Blossom River Apartments, 135 for Helzer Court Apartments, 68 for Morrone Gardens Apartments, 253 for Clarendon Apartments, 1405 for Bendorf Drive Apartments, 543 for Ford Road Plaza, 109 for Laurel Grove Family Apartments and 109 for Park Avenue Senior Apartments.

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	The waiting list re-opened in FY2021 as an always-open Interest List allowing individuals to add themselves to the list at any time and/or update their information. SCCHA anticipates exhausting its prior waiting list and initiating the random drawing of applicants from the Interest List for vouchers before the start of FY2022.

III. Proposed MTW Activities (HUD Approval Requested)

This section describes three re-proposed and four new MTW activities that SCCHA proposes to implement in FY2022.

RE-PROPOSED 2016-01

(Re-Proposed Activity)

RESTRICTION ON HEAD OF HOUSEHOLD CHANGES

Activity Description

SCCHA initially proposed activity 2016-1 to further its efforts to encourage 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 Family Self-Sufficiency (FSS) Program or any successor program. If the new HoH does not enroll in the FSS program, housing assistance will be terminated. In the rare case that this might occur, the household will be offered the opportunity to appeal the decision through the informal hearing process.

SCCHA is now re-proposing an amended version of Activity 2016-1 that substitutes enrollment to the FSS Program with SCCHA's ten-year time-limited pilot self-sufficiency program, Focus Forward Program (FFP), when it is implemented. If there are no slots available in the FFP, the new HoH will be enrolled in the existing FSS or FSS-successor program. The FFP, detailed in Activity 2014-1a and 1b, is tentatively scheduled to be implemented and begin participant enrollment late FY2021 or early FY2022. The previously proposed metrics more closely fit the FFP, rather than this activity; therefore, SCCHA is proposing revised metrics below.

HUD regulations do not place any limitations on the length of the voucher term for families. Each family member is entitled to remain on the program under the voucher unless the voucher is terminated for non-compliance or the family's income is sustained for 180 days at a zero Housing Assistance Payment (HAP) level. This promotes the use of the voucher as a legacy for the lifetime of the youngest family member. SCCHA believes that this MTW activity will encourage more families to move towards economic self-sufficiency, thereby decreasing intergenerational transfers of vouchers.

This activity is designed to be an encouragement to self-sufficiency. The new HoH who enrolls in the FFP will have the opportunity to work with assigned case managers and set economic self-sufficiency goals, as well as increased escrow fund opportunities.

Through this activity, SCCHA anticipates an increase in the number of families enrolled in the FFP, therefore, an increase in the number of families achieving gains in self-sufficiency. In CY2020, SCCHA completed 64 non-elderly, non-disabled Head of Household changes for various reasons. SCCHA expects the impact of this activity to vary annually based on the amount of HoH transfers completed and the number of FFP participants and graduates per year.

Relation to Statutory Objectives

This activity supports the statutory objective of promoting participants' economic self-sufficiency.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity when the FFP begins enrollment of participants in late FY2021 or early FY2022.

Because this activity will be based on the success of new families enrolled in the FFP which has a ten-year term, SCCHA expects the full impact of this activity will not be realized until 2031 at the earliest (ten years following implementation).

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. The original version of this Activity included metrics SS #1, SS #2, SS #3, SS #4, SS #5, SS #6, and SS #8. For the re-proposed activity, SCCHA is revising the metrics to consist of only SS #5 and SS #8.

Metrics SS #1, SS #2, SS #3, SS #4, and SS #6 are no longer appropriate because this Activity seeks to reduce the inter-generational transfer of vouchers, rather than directly increasing income, increasing savings, improving employment status, reducing dependence on TANF, or reducing per unit subsidies.

For metric SS #5, "services that increase self-sufficiency" are defined as the services a household receives upon FFP enrollment as a result of an eligible head of household change.

SCCHA is re-defining self-sufficiency for activities which use the "SS" metrics as households who leave assistance voluntarily, maintain zero Housing Assistance Payments after 180 days, or reach 80% or more of Area Median Income.

Activity 2016-01 Restriction on Head of Household Changes				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
SS #5: Households Assisted by Services that Increase Self-Sufficiency				
Number of Households receiving services aimed to increase self-sufficiency (increase)	0*	64	N/A	N/A
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase)	0*	TBD	N/A	N/A

*Zero was used for baselines because this is a new activity and there are no participants who meet criteria yet.

Cost Implications

SCCHA anticipates that there are no cost implications related to the implementation of the proposed activity.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 2.d. and waives certain provisions of Section 8(o)(7) of the 1937 Act and 24 CFR 982 Subpart L as necessary to implement SCCHA's MTW Plan. This authorization is needed to revise grounds for termination of program assistance to include refusal to enroll in the FFP with an eligible HoH change.

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 FY2022 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.

RE-PROPOSED 2019-01

(Re-Proposed Activity)

GRADUATION BONUS

Activity Description

HUD regulations require that Section 8 participants whose income increases to the point where SCCHA pays zero rental assistance to be placed on a 180-day “clock” for assistance termination (24 CFR § 982.455, 983.211). Activity 2019-1 changed these requirements in three ways: the threshold housing assistance level was changed from \$0 to \$99; the 180-day time period was for program termination was changed to 60 days; and upon termination from the Section 8 program, the family would receive a Graduation Bonus payment. SCCHA is now re-proposing an amended version of Activity 2019-1.

Re-Proposed Activity 2019-1 revises the graduation bonus threshold from a fixed dollar amount of the family’s monthly rent portion to a threshold based on the family’s total annual income. Families with annual incomes at or above 80% of Area Median Income (AMI) will be paid a graduation bonus of \$2,000 per eligible individual and removed from the Section 8 program 60 days after the family’s income has been certified by SCCHA and written notice has been sent to the family. Standard SCCHA policy (180-day clock for assistance termination) will continue to apply to zero-HAP families whose incomes are less than 80% of AMI. The graduation bonus amount will initially be set at \$2,000 per eligible individual, which is the approximate average monthly income of families eligible for termination through this activity. If SCCHA does not have sufficient funding to pay for bonuses, the families eligible for termination through this activity will instead be placed on the 180-day clock and not receive bonuses.

For the purposes of this activity, “eligible individuals” means members of the Section 8 participant family who have eligible immigration status and excludes 1) individuals who have ineligible immigration status, 2) live-in aides, and 3) foster adults/children. The \$2,000 “graduation bonus” payment will be contingent on the participant family’s positive exit from SCCHA’s Section 8 program – meaning the family must not be involuntarily terminated from the program for any reason except for this activity.

This re-proposed activity relies on a more accurate measure of self-sufficiency by basing the expedited graduation criteria on income rather than housing assistance level, which could penalize families who rent cheaper units. The graduation bonus is intended to ease the transition of formerly assisted families into the unsubsidized housing market. The payment is a “cushion,” which will serve as a financial reserve. Since the families affected by this activity will already have reached the point where their housing assistance is minimal, it is SCCHA’s expectation that graduated families will either stay in their current units or move to more preferred units. SCCHA does not intend, however, to exercise any control or influence over how graduated families spend their bonus payment. SCCHA does not currently plan to provide any services to families once they graduate.

SCCHA anticipates this activity will increase the graduation rate of Section 8 families. This activity is also expected to increase the rate at which SCCHA can serve applicants waiting for Section 8

assistance. Because of this, SCCHA does not expect this activity to have any significant impact on the requirement to serve substantially the same (STS) number of households because of the increased voucher turnover. For each family who graduates from the Section 8 program because of this activity, a new family can receive the benefit of the voucher's turnover.

Relation to Statutory Objectives

This activity supports the statutory objective of promoting participants' economic self-sufficiency by easing the transition from the Section 8 program to the unsubsidized housing market.

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.

SCCHA is re-defining self-sufficiency for activities which use the "SS" metrics as households who leave assistance voluntarily, maintain zero Housing Assistance Payments after 180 days, or reach 80% or more of Area Median Income.

The original Activity 2019-01 included metric HC #3: Decrease in Wait List Time. That metric is no longer appropriate for this Activity because of SCCHA's transition to the always-open Interest List, which is a random lottery and does not guarantee assistance to applicants.

Activity 2019-01: Graduation Bonus				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase)	24	100	N/A	N/A

Cost Implications

This activity will increase the agency's expenses. The agency expects to pay up to approximately \$800,000 in graduation bonuses in the first year, with smaller costs in subsequent years. SCCHA will pay these costs through MTW funds.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraphs D and E of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o)(4), 16(b), and 23 of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, 982, 983, and 984 as necessary to implement SCCHA's MTW Plan. This authorization is needed to change the trigger for automatic HAP

termination, to change the time period before automatic termination, and to provide for a graduation bonus payment upon automatic termination.

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 FY2022 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.

RE-PROPOSED 2020-05

(Re-Proposed Activity)

ELIMINATE THE 40% OF INCOME CAP AT INITIAL LEASING

Activity Description

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. This activity raises the 40% cap on the percentage of family income spent on rent to a 50% cap.

SCCHA initially proposed this activity in FY2020 as a 1-year technical amendment bypassing the public notice period, due to the 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. This activity was implemented to remove one of the barriers to quickly leasing up voucher holders, at a time when an increasing number of families are experiencing housing insecurity as a result of the pandemic.

During the nine months this activity has been in effect (April to December 2020), 165 families have been able to secure housing that they would not have been able to lease otherwise. SCCHA is re-proposing this activity in FY2022 in order to continue offering this flexibility to its families. In an area of the country where it is typical to pay over 50% of your monthly income towards housing costs, this activity waives what can be a prohibitive regulation for Section 8 tenants. Santa Clara County has a highly volatile rental housing market with extremely low vacancy rates, and landlords can demand and receive a higher rent than what SCCHA's payment standard will cover. This activity increases 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).

Relation to Statutory Objectives

This activity supports 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 2020-05: 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
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Cost Implications

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

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraphs D.2.a. of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o)(3) of the 1937 Act and 24 CFR 982.508 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 made available for public review and included as a proposed activity in the public hearing held for the FY2022 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.

2022-01

(Proposed Activity)

HOMEOWNERSHIP AND ASSET LIMITATIONS FOR ELIGIBILITY

Activity Description

HUD regulations do not currently prohibit homeownership as a part of the Section 8 program. The proposed rule to Section 104 of HOTMA, if a final rule is issued, would bar homeownership with certain exceptions and would bar from admission families with more than \$100,000 in assets. SCCHA is seeking more targeted limitations than those proposed by Section 104 of HOTMA.

This proposed activity would make the following applicants ineligible:

- Those with \$100,000 or more in assets per family member; and
- Those with a present ownership interest in a suitable home in which they have a legal right to reside in Alameda, Contra Costa, Marin, Merced, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, San Benito, Solano, and Stanislaus Counties.

Units excepted from this rule are those that are part of SCCHA's homeownership program, units not suitable for occupancy (i.e. vacant land or condemned properties), units jointly owned with a non-household member, and those owned by VAWA participants.

SCCHA is also proposing an asset cap of \$100,000 per person in the household. The cap would be assessed as a lump sum, regardless of individual ownership of each asset. This asset cap would ensure the most vulnerable people receive assistance while families with \$100,000 or more in assets per person would not be eligible for assistance.

The asset cap is reasonable for Santa Clara County, where the median household income is \$124,055, and the homeownership limitation's geographic scope is limited to the typical commute for workers in Silicon Valley. Currently, SCCHA is assisting 20 families with assets above the proposed \$100,000 per family member limit, and 14 participants own property located in one of these counties above.

These limitations on eligibility will allow the Housing Authority to assist those who do not have financial security in the form of real property or significant assets.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing housing choices by reducing the number of people eligible for assistance and thereby reducing the amount of time qualified applicants spend on the waiting/interest list.

Anticipated Schedule for Achieving the Stated Objectives

Once this activity is approved, SCCHA anticipates implementing the activity immediately upon the completion of updating staff work manuals.

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 2022-01: Homeownership and Asset Limitations for Eligibility				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC#3: Decrease in Wait List Time				
Average applicant time on wait list in months (decrease)	192	1	1	

Cost Implications

SCCHA anticipates that there are no cost implications to the proposed activity.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 3, Subpart b of SCCHA's MTW Agreement with HUD and waives certain provisions of 24 CFR 982 Subpart E, as necessary to implement SCCHA's MTW Plan. This authorization is needed because HUD does not bar homeownership and the HUD asset limit is lower than SCCHA's proposal.

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 FY2022 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.

2022-02

(Proposed Activity)

WAIVE FULL-TIME STUDENT INCOME EXCLUSION FOR FAMILIES EARNING 80% OR MORE OF AREA MEDIAN INCOME

Activity Description

HUD regulations at 24 CFR 5.609 (c)(11) exclude from annual income earnings in excess of \$480 for each full-time student 18 years old or older. There is no limit to the full-time student income that may be excluded from a family's annual income calculation. Full-time student income is excluded for any household member other than the head of household and spouse. Exclusion of income is not limited by a family member's age or by attainment of a degree. When calculating annual income for a family with a full-time student 18 years or older, SCCHA verifies the student's income and excludes all the income in excess of \$480. A household with full-time students, especially one where the full-time students have already earned college degrees can, therefore, be working at well-paying jobs without that income being counted towards the family's total income. The uncounted income results in higher-earning families paying much less in the tenant portion of the rent than families without full-time students.

With Activity 2022-02, SCCHA proposes excluding full-time student income only when a family's total annual income (before exclusion of any full-time student income) falls below 80 percent of the Santa Clara County area median income (AMI) applicable for that family's size. The 80 percent AMI limit would be updated annually to the effective HUD limits at the time of any income examination.

The Santa Clara County housing market is one of the most expensive in the country and the current Housing Choice Voucher Waiting List, last opened in 2006, has approximately 2,200 families waiting for assistance. SCCHA currently assists 17 families with full-time students whose pre-exclusion income meets or exceeds 80 percent of AMI. Housing affordability is typically defined as paying no more than 32 percent of gross income towards rent. The 17 families with excluded full-time student income are paying an average of 14 percent of their gross income towards rent and receive an average of \$1,300 in HAP. The 80 percent of AMI threshold would allow truly needy families to continue to realize the benefit of excluded income while pursuing education, and at the same time allow SCCHA to serve more families.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing agency cost effectiveness by reducing the housing subsidy paid for families with full-time students earning 80 percent or more of the AMI before excluding full-time student income.

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.

SCCHA is re-defining self-sufficiency for activities which use the “SS” metrics as households who leave assistance voluntarily, maintain zero Housing Assistance Payments after 180 days, or reach 80% or more of Area Median Income.

Activity 2022-02				
WAIVE FULL-TIME STUDENT INCOME EXCLUSION FOR FAMILIES EARNING 80% OR MORE OF AREA MEDIAN INCOME				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
CE #6: Reducing Per Unit Subsidy Costs for Participating Households				
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	\$1,332	\$0	\$0	N/A
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase)	0	10	N/A	N/A

Cost Implications

SCCHA anticipates that the proposed activity will not have any cost implications for the agency. SCCHA does anticipate that the proposed activity will reduce the per unit subsidy costs for affected households, and therefore allow SCCHA to serve additional households.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D (1)(c), Paragraph D, (3)(a) of SCCHA’s MTW Agreement with HUD and waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 5.609 as necessary to implement SCCHA’s MTW Plan. This authorization is needed to waive the exclusion of full-time student income from the calculation of an assisted family’s annual income.

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 FY2022 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.

2022-03

(Proposed Activity)

MAINSTREAM PROGRAM TURNOVER VOUCHER ISSUANCE FLEXIBILITY

Activity Description

HUD regulations require that at turnover, all Mainstream Program vouchers be reissued to the next Mainstream-eligible family on the Public Housing Authority's (PHA) waiting list. At the same time, the 2017, 2018, and 2019 Mainstream Voucher Program Funding Opportunities encourage PHAs to partner with local Continuum of Care agencies for direct referrals and create a preference for homeless or at-risk of homeless Mainstream participants. Further, PIH Notice 2020-01 requires Mainstream Program turnover vouchers to be issued to the waiting list applicants. This activity seeks to align these directives and create one set of rules for the entire Mainstream Program. Specifically, this Activity will waive the PIH Notice 2020-01 requirements to issue turnover vouchers to wait list applicants and use the NOFA guidance for all of SCCHA's Mainstream Program by issuing the turnover vouchers to applicants who have been directly referred by SCCHA's partner agency.

The Mainstream Program enables families having a non-elderly person (a person who is between 18 and 61 years of age) with a disability who are homeless or at-risk of becoming homeless and possibly institutionalized to lease housing with the assistance of a housing voucher. SCCHA's partnering agencies are the best identifiers of homeless, at-risk, or institutionalized persons with disabilities who can readily refer qualified applicants who are eager to locate permanent housing. In the best interest of serving as many clients as possible and in a timely manner, the option of utilizing direct referral to obtain applicants reduces the amount of administrative time spent vetting applicants from the interest/waiting list, improves lease-up rates and efficiently addresses the need to rapidly house those who are currently or at-risk of homelessness and/or institutionalization by allowing them to bypass the interest/waiting list.

In cases where eligible direct referral applicants who meet the preference for homelessness, at-risk of homelessness, institutionalized, or at-risk of institutionalization are unavailable, SCCHA plans to continue to utilize the interest/waiting list to fill Mainstream Program turnover vouchers.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing housing choices by improving the process by which Mainstream Program applicants are identified and served.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity immediately upon the completion of updating staff work manuals.

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 2022-03: Mainstream Program Turnover Voucher Issuance Flexibility				
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 households at or below 80% AMI as a result of the activity (increase) for non-elderly disabled households who are homeless, at-risk of homelessness, institutionalized, or at-risk of institutionalization.	0	5	N/A	N/A
HC #3: Decrease in Wait List Time				
Average applicant time on wait list in months (decrease).	166	0	N/A	N/A

Cost Implications

SCCHA anticipates that there are no cost implications related to the implementation of the proposed activity.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph C, Section 2 of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 3 of the 1937 Act and 24 CFR 960.206 as necessary to implement SCCHA's MTW Plan. This authorization is needed because HUD regulations and PIH Notice 2020-01 require the issuance of Mainstream Program turnover vouchers only to those on the PHA's waiting list. This activity seeks to issue vouchers to applicants via direct referral from its partnering agencies.

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 FY2022 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.

2022-04

(Proposed Activity)

MODIFIED PBV CONTRACT RENTS

Activity Description

24 CFR 983.301(b) requires PHAs to set contract rents for PBV units at the lowest of the following amounts:

1. 110% of the applicable Fair Market Rent minus any utility allowance;
2. The reasonable rent; or
3. The rent requested by the owner.

In high-cost areas, such as the San Francisco Bay Area, the reasonable rent often exceeds 110% of the FMR. This means that, in effect, SCCCHA will potentially have to pay 110% of the FMR for nearly every PBV unit in its portfolio. This has two negative effects: (1) paying 110% of the FMR results in SCCCHA paying more per unit than it receives in appropriations from HUD; and (2) SCCCHA's subsidy may result in excessive cash flow and profits for affordable housing projects.

With Activity 2022-4, SCCCHA seeks waivers of 24 CFR 983.301(b) and 24 CFR 983.302, with regard to the initial determinations and subsequent annual redeterminations of PBV contract rents to owners. This Activity will only apply to PBV HAP contract renewals and will not apply to new PBV HAP contracts or to PBV HAP contracts which are in the initial term. For PBV HAP contract renewals, SCCCHA is proposing that it be allowed to set PBV contract rents at a lower amount in cases where project underwriting analysis shows that there will be material excess cash flow. For larger projects with excess cash flow, contract rents would be limited to as low as 80% of FMR (for projects with 40 to 59 units) and as low as 70% of FMR (for projects with 60 or more units).

The following types of projects would not be subject to the lower contract rent limit:

- Projects with 39 or fewer units;
- Projects in which PBVs comprise 25% or less of the total units;
- Projects with a Debt Service Coverage Ratio (DSCR) of 1.3 or below for the first year of contract renewal;
- Projects with a DSCR in any year of the HAP renewal contract term below 1.0; or
- LIHTC financed projects that can't meet the True Debt Test (that the debt incurred for a Low Income Housing Tax Credit project is a "true debt" for tax purposes).

For projects subject to the lower contract rent limit, SCCCHA will limit redetermined rents to no more than 5% higher than the previous year's contract rent for years 2 through the end of the new contract term. Over the life of a PBV HAP contract, where the lower contract rent limit applies, SCCCHA will re-analyze projects once every 5 years or in the case of a genuinely unforeseen capital need. SCCCHA will then reset the contract rents at an appropriate level should the analysis show that a higher amount is necessary. The limit on re-determined rents will be subject to change between 5% and 10% if SCCCHA's analysis determines that such changes are necessary to meet the prevailing costs of operations and capital improvements.

This activity will allow SCCHA to better control its Housing Assistance Payments costs in the extremely expensive Bay Area housing market and will allow SCCHA to serve more families, while at the same time encouraging the construction and development of affordable housing in the area.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing cost effectiveness of agency operations by lowering the amount of Housing Assistance Payment subsidies for renewed PBV HAP contracts.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity immediately upon completing community outreach efforts, conducting appropriate market research, finalization of policy and Administrative Plan revisions, and the completion staff work manuals.

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 2022-04: Modified PBV Contract Rents				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
CE #6: Reducing Per Unit Subsidy Costs for Participating Households				
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).	\$1,893	\$1,700		

Cost Implications

SCCHA anticipates that there are no cost implications related to the implementation of the proposed activity. SCCHA does anticipate that the proposed activity will reduce the per unit subsidy costs for affected households, and therefore allow SCCHA to serve additional households.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 2.b. of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 8(o)(7) and 8(o)(13) of the 1937 Act and 24 CFR 983.301(b) and 24 CFR 983.302 as necessary to implement SCCHA's MTW Plan. This authorization is needed to deviate from HUD regulations which mandate that PBV contract rents be set at specified amounts.

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 FY2022 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.

IV. Approved MTW Activities (HUD Approval Previously Granted)

To date, SCCHA has had 52 activities approved by HUD. Of these, nine were closed out. For the FY2022 Plan, SCCHA is moving Activity 2009-8 from the Implemented Activities section to the On Hold section because it is anticipated to be closed out before the next Annual Report is submitted. 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 and FY2021

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 is re-proposed 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.

Re-proposed Activity 2009-1 assigned 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. MTW participants whose regular re-examinations had been scheduled during that time period had their re-examinations rescheduled for twelve months later, spreading out the administrative burden of re-examinations, allowing SCCHA staff to properly process the participants despite the disrupted work environment. The longer cycle also meant less families were required to take on the obligation of participating in a re-examination during a difficult period.

This re-proposed activity took effect immediately as a technical amendment, bypassing the public notice and comment period and was intended to last until June 30, 2021 or six months after the shelter-in-place orders have been lifted, whichever is longer. It has since expired, as of December 31, 2020.

SCCHA continues to use this activity, as originally proposed in FY2009 and amended in FY2016 during FY2022.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity during FY2022.

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 FY2022.

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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2022.

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 FY2022.

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 through the County.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 changed the structure of its waiting list system to a permanently open interest list, which was launched in FY 2021. As with the waiting list, SCCHA operates one combined interest list for both the City of San José and County of Santa Clara. SCCHA will continue to operate this joint interest list for the Housing Choice Voucher (HCV) and the Project-Based Voucher (PBV) Programs.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 Jose. There are no plans to utilize this MTW activity in FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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, which provides increased housing choices 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 FY2022.

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 FY2022.

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.

In FY2021, SCCHA amended this activity to further eliminate remaining required tasks associated with this HUD requirement. Specifically:

- Establishing contract rents (initial rent to owner and redetermined rent to owner);
- Establishing term of initial and any renewal HAP contract;
- Determining rent reasonableness; and
- Assisting the family in negotiating the rent with the owner.

These requirements still occur but are completed by SCCHA staff. The complete elimination of this requirement by a third-party will continue to decrease costs and increase administrative streamlining at SCCHA.

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 FY2022.

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 FY2022.

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).

In order 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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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

Predevelopment efforts continue at Alvarado Park Senior Housing and Bellarmino Place Family Housing. The adjacent developments, purchased with \$12 million in MTW funds, will provide 89 affordable units for seniors and 115 affordable units for families in an amenity rich neighborhood in San Jose. MTW funds in the amount of \$30 million were used to acquire property on East Santa Clara Street. This property will be home to at least four affordable housing developments providing hundreds of multi-family affordable housing units. Design development will continue in to FY2022 and MTW funds will be used in pursuing necessary land use approvals.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 Jose to acquire more of an ownership stake in the assets, and unplanned events arising as properties age. Capital projects are planned for several projects, starting with San Pedro Gardens, El Parador Apartments, Deborah Drive, and Helzer Court Apartments. In 2017, SCCHA used \$26 million in MTW funding to purchase the Buena Vista Mobile Home Park in Palo Alto, CA. Since acquisition, SCCHA and its partners have worked to stabilize the Park, complete HQS upgrades and inspections, and complete income certifications. SCCHA is currently working on the replacement of several coaches, as well as the long-term redevelopment and infrastructure upgrade plans for the Park. This planning work is anticipated to continue in FY2022.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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

PLAN YEAR APPROVED: FY2014 IMPLEMENTED: FY2021 AMENDED: FY2018

DESCRIPTION OF MTW ACTIVITY

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.

UPDATE ON MTW ACTIVITY

SCCHA is currently implementing the activity with the help of a consultant and plan on enrolling participants in Focus Forward in late FY2021, early FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

ACTIVITY 2014-1B: FOCUS FORWARD PILOT PROGRAM PART II - TIME LIMIT, RENT STRUCTURE & LIMITED PORTABILITY

PLAN YEAR APPROVED: FY2014 IMPLEMENTED: FY2021 AMENDED: FY2018 & FY2020

DESCRIPTION OF MTW ACTIVITY

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.

UPDATE ON MTW ACTIVITY

SCCHA is currently implementing the activity with the help of a consultant and plans on enrolling participants in Focus Forward in late FY2021, early FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 provided 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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2021, 63 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 FY2022.

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 FY2022.

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 consider 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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

ACTIVITY 2017-1: PHASING IN THE SUBSIDY STANDARD CHANGE

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

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to change the agency's subsidy standard policy to two persons per bedroom. Under this activity, if a household's voucher size changes due to the subsidy size change, the new voucher size does not take effect for 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 realize the ongoing benefit of reduced costs and an increase in the number of households served.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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

SCCHA continues to utilize this activity to expand housing opportunities for special needs populations.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 in order 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. As long as 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 FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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 FY2022.

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 FY2022.

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 utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2022.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2022.

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 FY2022.

2020-1: PBV PROGRAM CAP

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity was approved in FY2020 and raises the percentage cap for the Housing Authority of the City of San José (HAC SJ) and the Santa Clara County Housing Authority (SCCHA) to 40% of the respective baseline number of vouchers and removes the restrictions on the types of allowable units.

UPDATE ON MTW ACTIVITY

SCCHA is in the beginning stages of implementation and will utilize this activity when the number of Project Based Voucher units exceeds the 20% Program Cap threshold.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2022.

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 FY2022.

2020-2: INTERIM HOUSING

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity was approved in FY2020 and creates a local rental subsidy program to assist special needs populations. SCCHA is partnering with the City of San José and the County of Santa Clara to provide interim (short-term) housing to individuals and families who are approved for a Permanent Supportive Housing (PSH) unit to which SCCHA has attached a PBV, but the unit is not yet ready for occupancy. The interim housing will move these highly vulnerable clients off the street while they await their permanent home and will provide stability and allow case managers to begin engaging with the clients.

UPDATE ON MTW ACTIVITY

SCCHA and the County entered into an Agreement for services for Pedro Street Interim housing on December 1, 2020. The property at Pedro Street is undergoing improvements, which will make the building compliant with HQS. The County anticipates the property being ready for occupancy beginning in mid-February 2021. The future residents of Leigh Avenue Senior Apartments, a development for chronically homeless seniors, will be the first to potentially use the interim housing.

PLANNED NON-SIGNIFICANT CHANGES

SCCHA does not anticipate any non-significant changes to this activity and its authorizations during FY2022.

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 FY2022.

2020-3: OVER HOUSED/UNDER HOUSED PBV HOUSEHOLDS

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity modifies SCCHA's subsidy standards of the Project Based Voucher program where if a family 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 occur first.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

2020-4: RENT TO OWNERS & RENT REASONABLENESS

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

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 activity waives the requirement to reduce the approved contract rent in these circumstances. Instead, SCCHA only reduces the approved contract rent 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.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022.

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

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity changes the cap on the percentage of a family's income which can be paid towards the tenant portion of rent at initial lease-up from 40% to 50%.

UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity during FY2022.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations during FY2022.

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 FY2022. This activity was approved as a temporary technical amendment to the FY2020 MTW Annual Plan and is being re-proposed as a permanent activity in the FY2022 MTW Annual Plan.

Activities Not Yet Implemented

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 FY2021. During FY2019, SCCHA raised the threshold to redetermine rent reasonableness to 10% to align with the version of 24 CFR 982.507 effective November 2016.

2016-1: RESTRICTION ON HEAD OF HOUSEHOLD CHANGES

PLAN YEAR APPROVED: FY2016

SCCHA is re-proposing this activity in the FY2022 MTW Annual Plan.

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 after 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. Prior to implementing this activity, SCCHA will revise the metrics to include HUD standard metrics SS#6: Reducing Per Unit Subsidy Costs for Participating Households and SS#7: Increase in Agency Rental Revenue.

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 SCCCHA has not needed to implement this activity. SCCCHA 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.

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

2018-1: STRENGTHENING PARTNERSHIPS THROUGH CAPACITY BUILDING

PLAN YEAR APPROVED: FY2018

This activity allows SCCCHA 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 SCCCHA's pilot Focus Forward Program (FFP).

This activity will be implemented when SCCCHA implements the FFP. SCCCHA 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

SCCCHA is re-proposing this activity in the FY2022 MTW Annual Plan.

The original 2019-1 reduced the time a zero HAP participant's assistance is terminated from 180 days to 60 days. In addition, it extended the termination of assistance to families receiving HAP payments of \$99 or less. It also provided a lump sum bonus amount for these families upon termination of assistance.

Re-proposed 2019-1 changes the graduation threshold from HAP of \$99 or less to families which earn 80% or more of Area Median Income.

This activity is currently on hold pending the re-opening of SCCCHA's waiting list. SCCCHA anticipates implementing this activity in FY2021 or FY2022.

2021-1: IMPOSE LIMITS ON PBV TO HCV CONVERSION

PLAN YEAR APPROVED: FY2021

HUD regulations require that a public housing agency provide tenant-based assistance (in the form of a Housing Choice Voucher or other similar subsidy) to any PBV tenant who provides a notice to move from the PBV property (in compliance with their lease and HUD regulations) with continued tenant-based assistance. PBV tenants are given priority to receive available tenant-based vouchers above waiting list applicants.

This activity limits the number of PBV to HCV conversions to ten percent of the number of HCVs it plans to issue each year. Due to the significant demand for affordable rental housing in Santa Clara County and because the Housing Authority continues to assist persons off a Section 8 waiting list that is fourteen years old, this will allow the agency to exhaust its waiting list sooner.

Housing Choice Vouchers will be released to PBV tenants on a first come-first served basis until the maximum allotment is met. When the maximum is met, PBV tenants will be notified that they will not be able to receive an HCV until the next calendar year.

Upon completion of internal policies and procedures, this activity will be implemented in late FY2021 or early FY2022.

2021-2: MINIMUM RENT HARDSHIP EXEMPTION

PLAN YEAR APPROVED: FY2021

This activity replaces HUD's Minimum Rent Hardship exemption with a simpler policy that better addresses the needs of SCCHA's participants. SCCHA's policy does not differentiate between a temporary and long-term hardship and does not require staff to track and receive payments from participants after the hardship waiver is lifted.

This activity will be implemented when SCCHA begins pulling names from the new waiting list. SCCHA anticipates implementing this activity in FY2021 or FY2022.

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

Activities On Hold

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

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.

SCCHA utilizes this activity on an ongoing basis to fill vacancies in both new construction and existing PBV properties. SCCHA will no longer need this activity when we begin pulling names from our new, online, site-based waiting lists. SCCHA anticipates closing out this activity prior to FY2022.

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 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 was implemented in FY2012 and 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 tenants to gain some or all of the necessary skills to address daily living requirements, maintain housing, and, for work-able

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	\$17,112
70600	HUD PHA Operating Grants	\$418,816,933
70610	Capital Grants	\$2,300,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$388,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$121,164
70000	Total Revenue	\$421,643,209

Note 1: Source in Analysis

70600-HUD PHA Operating Grants \$418,816,933:

This FDS line represents the sum of the following: (1) Public Housing Operating Subsidy Income \$11,633 and (2) Section 8 MTW Admin Fee & HAP Earned \$418,816,933.

7120+71300+71310+71400+71500 - Other Income \$121,164:

This FDS line represents the sum of the following: (1) Land lease \$116,000, (2) Ground lease \$4,564, (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	\$26,584,015
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$322,145
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$26,332
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$109,766
95000 (95100+95200+95300+95500)	Total Protective Services	\$66,250
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$244,224
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$1,155,949
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$38,900
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$368,405,814
97400	Depreciation Expense	\$646,752
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$397,600,146

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

Net Balance Analysis

For Fiscal Year 2022, the net reserve balance of \$24,043,063 (MTW funding) will be used to fund the following:

I-Activity 2012-3-Acquisition & Development Funds - \$2.3M:

SCCHA anticipates the use of \$2.3M from Public Housing Capital Grant as an additional source to fund the redevelopment efforts of the Bellarmino Place project.

II-Activity 2012-3-Acquisition & Development Funds - \$6.75M:

SCCHA anticipates the use of \$6.75M to fund a variety of development projects including \$1.3M for redevelopment of the Bellarmino Place project, \$1.6M for redevelopment of the Alvarado Park project, \$3.81M for development of the East Santa Clara projects.

III-Activity 2012-4-Preservation Funds - \$10.9M:

SCCHA anticipates the use of \$10.9M to fund a variety of preservation projects including \$2.5M for development on Buena Vista Mobile Home Park, 450K for capital projects at Helzer Court Apartments, \$800K for El Parador's rehabilitation projects, \$5M for San Pedro Garden, \$2M for refinancing existing loans at DeRose Gardens Apartments, and 100K for capital projects at Deborah Drive.

IV- Activity 2012-4-Preservation Funds - Asset Management-transfer of \$1.7M:

The transfer of \$1,708,035 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.

Note 2 - Source Out Analysis

910000 - Total Operating - Administrative \$26,584,015:

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).

92500-Total Tenant Services- \$322,145:

This FDS line is consisted of \$64K salaries/benefits, \$3K resident programs, \$1K worker's compensation insurance and \$255K for other admin contract-tenant services.

96100-Total Insurance Premiums - \$244,224:

This FDS line is consisted of \$48K liability insurance, \$191K worker's compensation insurance, and \$5K for other insurance.

96000 - Total Other General Expenses - \$1,155,949:

This FDS line is comprised of (1) \$1.1M compensated (vacation/sick) absences, (2) \$84K admin fee port out, (3) \$1K payment In Lieu of Taxes, and (4) \$6K Covid-19 Expenses.

97300+97350 - Housing Assistance Payments + HAP Portability-In \$368,405,814:

This FDS line represents the total HAP paid out \$368M and HAP Focus Forward incentive \$5K.

HAP Portability -It is not budgeted in FY2022 as SCCCHA 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 SCCCHA 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 FY2022, SCCCHA 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 continue several Information Technology Department projects, such as migrating our Section 8 software system to the Cloud, upgrading servers, upgrading our scanning systems, and expanding e-signature capabilities.

In FY2022, the agency will be continuing the rolling-out of additional features in a 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. "SCCHA 2.0" will be a comprehensive digital communication, client interface, document management, task management, and oversight system utilized by both agency staff and clients.

B. LOCAL ASSET MANAGEMENT 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 FY2022 ANNUAL MTW PLAN AND CERTIFICATIONS OF COMPLIANCE

The SCCHA Board Resolution adopting the FY2022 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 FY2022 ANNUAL MTW PLAN

SCCHA's FY2022 MTW Annual Plan was made available for public review from February 22, 2021 through March 24, 2021. In addition to SCCHA's regular Board of Commissioner's Meetings, where the public may comment on the MTW plan, one MTW Plan stakeholders' meetings was held on January 14, 2021. The public hearing for the plan was held on March 12, 2021. There was 1 member of the public in attendance and no written comments were received.

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

In FY2022, 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. 21-02

RESOLUTION NO. 21-02

RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SANTA CLARA COUNTY HOUSING AUTHORITY APPROVING SUBMISSION OF THE FY2022 MOVING TO WORK (MTW) ANNUAL PLAN TO US DEPARTMENT OF HUD

WHEREAS, the Santa Clara County Housing Authority, 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 and a subsequent extension through 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 thirteenth year in the MTW Program, SCCHA has drafted its FY2022 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 2022 Moving to Work Annual Plan for SCCHA and the Housing Authority of the City of San José; and
3. Authorizes SCCHA to submit the 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 1, 2021, held at 505 W. Julian Street, City of San Jose, State of California, upon motion from Commissioner Kathy Espinoza-Howard and seconded by Vice Chair Denis O'Neal with the following vote:

AYES: Chair Jennifer Loving, Vice Chair Denis O'Neal, Commissioner William Anderson, Commissioner Ericka Mendieta, Commissioner Kathy Espinoza-Howard, Commissioner Adrienne Lawton, Commissioner Marilyn Russell

NAYS: None

ABSTAIN: None

ABSENT: None

By: *Jennifer Loving*
Jennifer Loving (Apr 1, 2021 11:42 PDT)
Jennifer Loving, Chair

ATTEST: *Sharon Jones*
Sharon Jones (Apr 1, 2021 11:47 PDT)
Sharon Jones,
Secretary/Acting Executive Director

APPROVED AS TO FORM:

Valerie J. Armento
Valerie J. Armento (Apr 1, 2021 11:45 PDT)
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: Certifications of Compliance

CERTIFICATIONS OF COMPLIANCE	
<p align="center"><i>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</i></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, 2021, 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 identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing. (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135. (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F. 	

- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment 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

Jennifer Loving
jennifer loving (Apr 1, 2021 11:42 PDT)

Apr 1, 2021
DATE

SIGNATURE

* 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
<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, 2021, 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> <p>(23) 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.</p> <p>(24) 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.</p> <p>(25) 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).</p> <p>(26) 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.</p> <p>(27) 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.</p> <p>(28) 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.</p> <p>(29) 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.</p> <p>(30) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.</p> <p>(31) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.</p> <p>(32) 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.</p> <p>(33) 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.</p> <p>(34) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.</p>

- (35) 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.
- (36) 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.
- (37) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (38) 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.
- (39) 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.
- (40) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (41) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (42) 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.
- (43) 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.
- (44) 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

Jennifer Loving
Jennifer Loving (Apr 1, 2021 11:42 PDT)

Apr 1, 2021
DATE

SIGNATURE

* 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



Department of Housing
JACKY MORALES-FERRAND, DIRECTOR

March 15, 2021

RE: FY2022 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 2020-2025 Consolidated Plan, which was approved by City Council in August 2020.

The Housing Authority's FY2022 MTW Plan activities and objectives are consistent with the five-year goals of the City of San José's 2020-2025 Consolidated Plan in the efforts to:

1. **Prevent and Address Homelessness** – Increase housing opportunities and self-sufficiency for homeless populations and assist in the prevention of homelessness for at-risk individuals and families.
2. **Create and Preserve Affordable Housing** – Create new affordable housing and preserve existing affordable housing.
3. **Promote Fair Housing** – Promote fair housing and lower barriers to housing.
4. **Strengthen and Stabilize Communities** – Strengthen and stabilize communities' condition and help to improve residents' ability to increase their employment prospects and grow their assets.

Sincerely,

Signature

Jacky Morales-Ferrand	Director
Print Name	Title

March 15, 2021
Date



County of Santa Clara

Office of Supportive Housing

2310 N. 1st Street, Suite # 201
San Jose, CA 95131
(408) 278-6400 Main
(669) 220-1444 Fax



March 16, 2021

Sharon Jones, Acting Executive Director
Santa Clara County Housing Authority
505 W. Julian Street
San Jose, CA, 95110

RE: FY2022 Moving to Work Plan Certification of Compliance

Dear Mr. Prince:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2022 Moving to Work (MTW) Plan as drafted is consistent with the direction of the Urban County of Santa Clara 2020-2025 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2022 MTW Plan activities and objectives are consistent with the five-year goals of the Urban County of Santa Clara 2020-2025 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,

Declassified by:
Consuelo Hernandez
781118/CONF/00000000
Consuelo Hernandez, AICP
Director, County of Santa C

Board of Supervisors: Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian
County Executive: Jeffrey V. Smith

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

Applicant Name

CA059 Santa Clara County Housing Authority

Program/Activity Receiving Federal Grant Funding

Section 8 Housing Choice Voucher Program

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Sharon Jones

Title

Acting Executive Director

Signature



Date (mm/dd/yyyy)

01/26/2021

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.2

Certification of Payments to Influence Federal Transactions

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

Applicant Name

CA056 Housing Authority of the City of San Jose

Program/Activity Receiving Federal Grant Funding

Section 8 Housing Choice Voucher Program

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Sharon Jones

Title

Acting Executive Director

Signature



Date (mm/dd/yyyy)

01/26/2021

Previous edition is obsolete

Form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.2

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
(See reverse for public ~~disclosure~~ disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement N/A d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award N/A		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ N/A 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 (if individual, last name, first name, MI): Fennel Consulting, LLC 101 Constitution Avenue, N.W. Suite 800 Washington, DC 20001			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): 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:  Print Name: Sharon Jones Title: Acting Executive Director Telephone No.: 408-993-2904 Date: 01/26/2021		
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

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 <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance N/A		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award N/A		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____ N/A	
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 San Jose 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 (if individual, last name, first name, MI): Fennel Consulting, LLC 101 Constitution Avenue, N.W. Suite 800 Washington, DC 20001			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): 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>Sharon Jones</u> Print Name: <u>Sharon Jones</u> Title: <u>Acting Executive Director</u> Telephone No.: <u>408-993-2904</u> Date: <u>01/26/2021</u>		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		