

# San Antonio Housing Authority

# Moving to Work Plan

# FY 2012-2013

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July 2, 2012

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## **1. INTRODUCTION**

### **A. What is Moving to Work?**

The Moving to Work (MTW) designation provides the San Antonio Housing Authority (SAHA) the flexibility to design and test innovative approaches in the form of MTW Activities. SAHA's involvement with MTW dates back to May 2000, when SAHA implemented its initial MTW demonstration program in three public housing communities: Mission Park Apartments, Wheatley Courts, and Lincoln Heights Courts. In 2009, SAHA signed an amended and restated agreement with the U.S. Department of Housing and Urban Development (HUD) to make the MTW demonstration an agency-wide program.

### **B. What is an MTW Activity?**

An MTW Activity is an initiative or a program that requires MTW flexibility to waive statutory or regulatory requirements. All MTW Activities must implement one or more of the three statutory MTW Goals.

### **C. What are the three MTW Goals?**

- Reduce cost and achieve greater cost effectiveness in Federal expenditures
- Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient
- Increase housing choices for low-income families

SAHA uses the MTW Goals to guide not only MTW Activities and associated initiatives, but also many other policies and programs that SAHA implements throughout the year. For this plan year, as addressed in Section 4, those policies and programs include an agency-wide strategic planning process, Choice Neighborhood planning and implementation, and implementation of the Affordable Housing Preservation and Expansion Policy.

**D. What is the MTW Plan?**

The MTW Plan describes SAHA's goals for new MTW Activities for the dates of July 1, 2012 through June 30, 2013 (FY2012-2013). It also provides updates for ongoing MTW Activities. The MTW Plan is updated annually and is as a key element of SAHA's MTW Agency Plan.

**E. MTW Activities proposed for FY 2012-2013**

Four new MTW Activities are proposed for FY 2012-2013 to supplement ongoing MTW Activities approved in previous years.

<b>Activity</b>	<b>Description</b>	<b>MTW Goal(s)</b>
FY2013-1	Time-limited Working Household Preference Pilot Program	Increase housing options Increase self-sufficiency
FY2013-2	Simplified Earned Income Disregard (EID)	Increase self-sufficiency Reduce cost and increase cost effectiveness
FY2013-3	Standardize Section 8 and Public Housing Inspection Processes	Reduce cost and increase cost effectiveness
FY2013-4	HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Reduce cost and increase cost effectiveness

## 2. GENERAL HOUSING AUTHORITY OPERATING INFORMATION

### A. Housing Stock Information

Anticipated number of public housing units at the beginning of the year (July 1, 2012)

<b>Current (July 1, 2012)</b>	<b>Additions</b>	<b>Dispositions</b>	<b>Total (June 30, 2013)</b>
6322	190	116	6396

General description of any planned significant capital expenditures by development (>30% of the Agency's total budgeted capital expenditures for the fiscal year)

SAHA does not foresee any capital expenditures for any single development that would be greater than 30% of SAHA's total proposed capital expenditures between July 1, 2012 and June 30, 2013.

Description of any new public housing units to be added during the year by development (specifying bedroom size, type, accessible features, if applicable)

The following tables provide estimates of projected development that includes public housing units.

<b>Sutton 2</b>	<b>Total units</b>	<b>Market</b>	<b>60% Tax Credit</b>	<b>50% Tax Credit</b>	<b>Public Housing</b>
One bedroom	48	11	30	2	5
Two bedroom	101	18	33	15	35
Three bedroom	52	14	24	7	7
Four Bedroom	7	3	1	1	2
	<b>208</b>	<b>46</b>	<b>88</b>	<b>25</b>	<b>49</b>

<b>Victoria Commons</b>	<b>Total units</b>	<b>Market</b>	<b>60% Tax Credit</b>	<b>50% Tax Credit</b>	<b>Public Housing</b>
One bedroom	88	70	--	--	18
Two bedroom	70	56	--	--	14
Three bedroom	--	--	--	--	--
Four Bedroom	--	--	--	--	--
	<b>158</b>	<b>126</b>	<b>0</b>	<b>0</b>	<b>32</b>

<b>San Juan Phase 3</b>	<b>Total units</b>	<b>Market</b>	<b>60% Tax Credit</b>	<b>50% Tax Credit</b>	<b>Public Housing</b>
One bedroom	12	--	10	--	2
Two bedroom	105	--	105	--	--
Three bedroom	123	--	78	--	45
Four Bedroom	12	--	10	--	2
	<b>252</b>	--	<b>203</b>	--	<b>49</b>

<b>San Alfonso</b>	<b>Total units</b>	<b>Market</b>	<b>60% Tax Credit</b>	<b>50% Tax Credit</b>	<b>Public Housing</b>
One bedroom	27	--	--	--	27
Two bedroom	2	--	--	--	2
Three bedroom	--	--	--	--	--
Four Bedroom	--	--	--	--	--
	<b>29</b>	--	--	--	<b>29</b>

<b>Acquisition #1</b>	<b>Total units</b>	<b>Market</b>	<b>60% Tax Credit</b>	<b>50% Tax Credit</b>	<b>Public Housing</b>
One bedroom	36	--	25	--	11
Two bedroom	59	--	45	--	14
Three bedroom	24	--	18	--	6
Four Bedroom	--	--	--	--	--
	<b>119</b>	--	<b>88</b>	--	<b>31</b>

Number of public housing units to be removed from the inventory during the year by development specifying the justification for the removal

<b>Development</b>	<b>Public Housing Units</b>	<b>Justification</b>
San Juan Homes	116	Planned redevelopment of site
<b>Total</b>	<b>116</b>	

Number of MTW Housing Choice Vouchers (HCV) units authorized

The total number of MTW HCV units authorized is **12,571**. SAHA has 75 Non-elderly and Disabled (NED) Vouchers that are included in the count of MTW HCV baseline units.

Number of non-MTW HCV units authorized and anticipated total number of non-MTW HCV units leased in the Plan year

<b>Non-MTW HCV</b>	<b>Units Authorized</b>	<b>Units Leased by July 2012</b>	<b>Percent</b>
VASH	240	240	100%
VASH (125)	125	125	100%
VASH PBV	25	25	100%
VASH (20)	20	13	65%
Shelter Plus (1002)	86	86	100%
Shelter Plus (900)	15	15	100%
MODS	355	355	100%
<b>Total</b>	<b>866</b>	<b>859</b>	<b>95%</b>

Number of HCV units to be project-based during the Plan year, including description of each separate project

All units to be project-based during this Plan year (181) are at one project, Springhill, which contains 449 units. Project-basing is considered an important strategy to increase occupancy at Springhill. Families are selected from the local project-based waiting list based on the availability of units at Springhill. Project-based families must reside at Springhill for 2 years, after which time the family will be eligible for a Section 8 voucher.

The following table projects units at Springhill based on current lease up average. As of January 14, units were leasing at an average rate of 3 units per month.

<b>Springhill PBV</b>	<b>Units Authorized</b>	<b>Units Leased</b>
Jul-12	181	21
Aug-12	181	24
Sep-12	181	27
Oct-12	181	30
Nov-12	181	33

Dec-12	181	36
Jan-13	181	39
Feb-13	181	42
Mar-13	181	45
Apr-13	181	48
May-13	181	52
Jun-13	181	55
	<b>2172</b>	<b>452</b>

**B. Leasing information, Planned – this information is estimated and may be subject to change during the Plan year**

Anticipated total number of MTW public housing units leased in the Plan year

<b>Public Housing Unit Leased</b>	<b>Units</b>	<b>Number Leased</b>	<b>Percent</b>
Elderly / Disabled	2337	2295	98%
Family	3985	3865	97%
<b>Total</b>	<b>6351</b>	<b>6183</b>	<b>97%</b>

Anticipated total number of non-MTW public housing units leased in the Plan year

Not applicable: all SAHA public housing units are MTW.

Anticipated total number of MTW HCV units leased in the Plan year

<b>MTW HCV</b>	<b>Units Authorized</b>	<b>Units Leased</b>	<b>Percent</b>
12-Jul	12,571	12,664	100.7%
12-Aug	12,571	12,589	100.1%
12-Sep	12,571	12,914	102.7%
12-Oct	12,571	12,839	102.1%
12-Nov	12,571	12,764	101.5%
12-Dec	12,571	12,689	100.9%
13-Jan	12,571	12,614	100.3%
13-Feb	12,571	12,539	99.7%
13-Mar	12,571	12,464	99.1%



13-Apr	12,571	12,389	98.6%
13-May	12,571	12,314	98.0%
13-Jun	12,571	12,239	97.4%
<b>Total</b>	<b>150,852</b>	<b>151,018</b>	<b>100.1%</b>

Anticipated total number of non-MTW HCV units leased in the Plan year

Non-MTW HCV	Units Authorized	Units Leased by July 2012	Percent
VASH	240	240	100%
VASH (125)	125	125	100%
VASH PBV	25	25	100%
VASH (20)	20	13	65%
Shelter Plus (1002)	86	86	100%
Shelter Plus (900)	15	15	100%
MODS	355	355	100%
<b>Total</b>	<b>866</b>	<b>859</b>	<b>95%</b>

Description of anticipated issues relating to any potential difficulties in leasing units (HCV or public housing)

HCV anticipates difficulties in leasing Springhill (PBV), due to the property's high-crime rate, high turnover rate, location, and difficulty establishing a strong marketing strategy.

**C. Waiting List Information**

Description of anticipated changes in waiting lists (site-based, community-wide, HCV, merged) and description of anticipated changes in the number of families on the waiting list(s) and/or opening and closing of the waiting list(s)

SAHA currently maintains separate waiting lists for public housing and HCV. The public housing waiting list is open, but the HCV waiting list is closed. There are currently 18,192 applicants on the waiting for public housing, and less than 2,000 on the waiting list for HCV.

SAHA is preparing to open a single HCV waiting list prior to the plan year. The new system will make use of an always-open, on-line waiting list. In addition to the primary waiting list,

SAHA will also maintain separate waiting lists for MTW Local Project Base Voucher and Moderate Rehabilitation vouchers.

SAHA anticipates around 20,000 new registrations when the new waiting list system is opened.

### **3. NON-MTW RELATED HOUSING AUTHORITY INFORMATION (OPTIONAL)**

#### **A. List planned sources and uses of other HUD or other Federal Funds (excluding HOPE VI)**

Not applicable.

#### **B. Description of non-MTW activities proposed by the Agency**

##### Police Units at Lincoln Courts

Two units are being set aside at Lincoln Courts to increase security for public housing residents. The units will be provided free of rent to the officers for a term of 3 years. SAHA will obtain HUD approval letters for each unit occupied by a police officer before selecting this Sub-Category in IMS/PIC. Each unit will be used as a full-time dwelling unit, and a written lease will be executed for each unit.

The two units are:

- 1306 N. Hamilton, unit LI0221
- 1402 N. Elmendorf, unit LI0081

##### Mirasol Settlement of Funds and Planning Process

The SAHA Board of Commissioners voted on May 5, 2011, to accept a \$20 million settlement in the lawsuit against Magi Realty, Inc., KB Home, Heery International and subcontractors, signifying the end of litigation between the parties.

Now that the formal settlement agreement has been finalized, SAHA has started the process of revitalizing the communities located in five subdivisions in the Westside of San Antonio. SAHA is exploring planning and redevelopment options for the use of the settlement funds by soliciting input from a broad range of community stakeholders about how to most effectively improve the neighborhoods. SAHA staff has initiated discussions with the local HUD Field Office, Westside Development Corporation, St. Mary's University Neighborhood Revitalization Project, City of San Antonio Residential Building Inspections, Greater San Antonio Builders Association

(GSABA), UTSA Texas Sustainable Energy Research Institute (TSERI) and CPS Energy Research Technology Initiatives.

SAHA's intent is to dispose of the houses in their current condition to affordable housing agencies via a solicitation for sale. Next steps will include completion of an appraisal and submission of a disposition application to HUD to transfer the Public Housing inventory to the SA Homeownership Opportunity Corporation, a SAHA non-profit. Pending HUD approval of the disposition application SAHA will continue to maintain the vacant structures.

The eventual solicitation will include certain design guidelines for the repair work, job employment offers for Section 3 individuals and a percentage of the sale price. The affordable housing agencies would solicit and distribute to their builder members the single family lots by address and commence the repair work. The individual members would undertake the repairs at their cost; market the houses and sell to buyers whose income level is up to 80% of the area median income for San Antonio. Each builder's efforts should result in a more diverse exterior design as well as an improved energy efficient house. The sale value of these houses should not exceed \$90,000 and are more likely to be sold between \$65,000 and \$80,000, depending on house size. The repair risk, sale and maintenance of the houses until sold will be the builders' responsibility. SAHA's financial portion would be 10% at the point of sale from the builders' sale to the buyers.

Blue Ridge Subdivision is the largest and the most problematic subdivision, generating incidents of trespassing and break-ins. Therefore, this subdivision will be the first to undergo repairs, marketing and the sale of the houses. The 38 vacant house sites in the Blue Ridge subdivision could take 1½ years to sell.

The discussions held with the various agencies indicate that the total absorption could take up to four years for all 85 vacant house sites in all subdivisions.

Discussions are underway with CPS Energy and the UTSA/TSERI to monitor the energy improvements made on the houses over the first year after the houses are sold. The Build San Antonio Green Level 2 criteria will be employed by the affordable housing builders to make these houses more energy efficient. The builders will also have access to lenders that offer

Energy Efficient Mortgages (EEM), which increase loan capacity to buyers. The City of San Antonio and the St. Mary's Revitalization Project will offer home buyers assistance and employment opportunities for families moving into this neighborhood.

#### Non-MTW Voucher Programs

SAHA administers other HUD voucher programs, such as Mainstream (MS), Shelter Plus Care (SPC), Veteran Affairs Supportive Housing (VASH), Moderate Rehabilitation Program (MOD), and Disaster Housing Assistance Program (DHAP).

Mainstream (MS) – provides rental assistance to disabled families that meet one of HUD's target funding categories. There are 100 families authorized for assistance under this program.

Shelter Plus Care (SPC) – provides rental assistance to families with mental disabilities and is a referral-based program in partnership with The Center for Health Care Services. There are 86 families authorized for assistance under this program.

Veteran Affairs Supportive Housing (VASH) – serves homeless veterans by combining the Section 8 HCV rental assistance program with case management and clinical services provided by Veterans Affairs medical centers. There are 410 families authorized for assistance under this program.

Moderate Rehabilitation Program (MOD) – provides project-based rental assistance for low-income families. There are 355 families authorized for assistance under this program.

#### **4. LONG-TERM MTW PLAN**

SAHA is in the midst of a planning process known as Plan.Build.Live. that will produce a long-term strategic plan for the agency. SAHA's MTW goals have functioned as a platform to initiate discussions of long-term policy priorities, while also suggesting activities, metrics, and benchmarks to measure progress on an annual basis. SAHA anticipates that the strategic planning process will generate clear priorities that will guide the manner in which SAHA uses its MTW flexibility for years to come.

The recently inaugurated Choice / Promise Neighborhood initiative is already starting to play an important role in MTW planning. San Antonio is one of three cities where Choice and Promise initiatives are geographically coterminous and administratively coordinated. The Wheatley neighborhood stands to benefit, over the short and long term, from the coordinated application of Promise's early-childhood initiatives and Choice's comprehensive transformation plan. Over the years, SAHA anticipates that MTW will play a strong role in the implementation of Promise and Choice.

The MTW Plan will also guide the implementation of SAHA's Affordable Housing Preservation and Expansion Policy. The Policy establishes the principles, goals, priorities, and strategies of the agency regarding the construction, maintenance, rehabilitation, and disposition of housing assets. The Policy governs where and under what conditions specific types of housing are built, renovated, disposed, or liquidated. The Policy also establishes parameters by which to evaluate future decisions related to affordable housing preservation and expansion activities.

## **5. PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED**

### **FY2013-1: Time-limited Working Household Preference**

#### **A. Description**

- Pilot project (max 200 households) for public housing residents only
- Creates an optional working household waiting list preference to provide time-limited housing assistance
- Households who choose to apply under this preference would receive five years of housing assistance, with a two-year extension, if needed, based on hardship
- When this preference becomes available, SAHA will inform waiting list applicants via written notice (letter) describing the preference, emphasizing the time-limited nature of the housing assistance, and providing instructions on how to select the preference
- When applicants who have selected this preference are called in from the waiting list, staff will ensure that the applicants understand that a time limit is associated with the preference
- Hardship policies mirror FSS practices and policies: SAHA can extend the term of the assistance up to 2 years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension
- FSS participation is required
- Each FSS family will receive case management services from a FSS Case Manager who maintains close communication with the family works with them to develop an Individual Training and Service Plan (ITSP)
- The ITSP establishes specific interim and final goals to measure the family's progress toward fulfilling its obligations and becoming self-sufficient
- The FSS contract will be modified to highlight the time limit associated with the preference
- Elderly or disabled are eligible for the optional working household preference regardless of work status
- EIV(Earned Income Verification) will be used during the initial housing process and at subsequent recertifications

This activity was developed over the course of the public input process, which started in November 2011 with staff meetings and continued through the March 20, 2012 public hearing. During that interval, staff gathered feedback from the Board of Commissioners, the MTW Advisory Board, the public housing Resident Leadership Council, and HCV participants. A version of this particular activity was presented as early as January 17, 2012. That version evolved into its present form as feedback was continuously incorporated into the proposal.

Comments from residents, participants, and external stakeholders who serve on the MTW Advisory Board included:

- The rationale for five years (versus 3 or 7 years, for example) needs to be explained
- The benefits of serving a larger number of people on waiting list need to be weighed against the costs of unit turnover and the potential of continuous cycling of families in and out of housing
- Some were skeptical that a family would be able to increase their income sufficiently in 5 years to qualify as self-sufficient
- If the time limits are kept, a mechanism needs to be developed defining the hardship circumstances under which a household would be allowed to keep receiving assistance beyond the 5-year limit
- It may be useful for SAHA to do exit interviews to understand why households leave when they do
- FSS participation should be a requirement
- Initiate activity as a pilot project and measure effectiveness before scaling up

By the time of the public hearing, initial concerns expressed by some stakeholders appeared to have been addressed by two key elements: structuring the activity as a pilot project and requiring FSS participation.

**B. Describe how each proposed activity relates to at least one of the three statutory objectives**

- Increase housing options
- Increase self-sufficiency



**C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective**

- Impact to Clients: Creates optional track for households that need short-term housing assistance to receive that assistance quickly
- Impact to Agency: Five-year time limit ensures that a larger number of households can be served

**D. Describe baselines, proposed benchmarks, and metrics to assess outcomes, include anticipated schedules**

<b>Metric</b>	<b>Baseline</b>	<b>Benchmark</b>
Number of qualified households selecting this preference	0	200
Average time spent on assistance	0	5 years
Average income of participating households	\$10,300	10% increase by end of participation
Rate of hardship requests	0	5% of number of participants
Average length of term of employment	0 months	June 30, 2013: 6 months June 30, 2014: 12 months

**E. Describe the data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives**

Data collection for this activity will use Elite to track households on waiting lists, and TAAG to track case management.

**F. Contracts, extensions, needs assessments, case notes are documented in Elite. ITSP, referrals, milestones, needs assessment, and case notes are documented in TAAG. The information is captured in multiple systems to facilitate access by staff who only have access to one system. Authorization**

MTW Agreement Attachment C, Section B(4) (Transitional/Conditional Housing Program), Section C(2) (Local Preferences and Admission and Continued Occupancy Policies and Procedures), Section C(5) (Use of Public Housing as an Incentive for Economic Progress), Section C(11) (Rent Policies and Term Limits), Section D(2) (Rent Policies and Term Limits, specifically Section D(2)(d) authorization to implement term limits for MTW HCV units), and Section D(4) (Waiting List Policies).

## FY2013-2: Simplified Earned Income Disregard (EID)

### A. Description

- Expands the number of months for which EID is available to participants to 60 months
- Benefit is available continuously during the 60 months, without start/stop
- Income is disregarded on a sliding scale based on year of participation
  - During year 1, 100% of earned income is disregarded
  - Year 2: 50%
  - Year 3: 25%
  - Year 4: 20%
  - Year 5: 10%
- Head, spouse, or co-head of household qualifies entire household (formerly only Head of Household could participate)
- New FSS participants who use EID would **not** make use of escrow. Program does not change for current FSS participants, who may continue to use their escrow.
- Available to both public housing residents and HCV participants. Currently, the HCV program only offers EID to participants who are disabled. The simplified EID would be available to HCV households whose head, spouse, or co-head qualifies as disabled. The simplified EID would be available to all public housing residents.
- Agency's Board approval of policy: see Section 8.A. for Board-approved Resolution 5252 Dated April 5, 2012.
- Impact analysis:
  - **Who is impacted:** the simplified EID would be made available to HCV households whose head, spouse, or co-head qualifies as disabled; and to all public housing residents. Current users of EID are **not** impacted by this activity.
  - **General description of impact:** new households opting to use the EID will be offered a slightly different program than previous households. There are three key differences:
    1. Instead of an escrow, households will be charged less rent based on a percentage of income disregarded

2. The amount of time during which some percentage of income will be disregarded is extended to 60 consecutive months. Previously, the benefit was available for a 24 non-consecutive months.
  3. The Head of household, spouse, or co-head of household qualifies the entire household. Previously, only heads of household could participate. This change allows for more household income to be disregarded.
- Annual reevaluation of rent reform initiative: This activity will be reevaluated on an annual basis as part of the MTW Report production process.
  - Hardship case criteria: This activity encourages employment and phases out the benefit gradually over five years. No hardship criteria specific to this activity are being proposed, but FSS participants will have access to case managers to track progress and issues as they arise.
  - Transition period: the new EID will be available on July 1, 2012.
  - Documentation of public hearing (may be same as Annual Plan hearing): The public hearing for the Annual Plan, which also served as the Public Hearing for the Rent Policy, took place on March 20, 2012.
  - This activity was developed over the course of the public input process, which started in November 2011 with staff meetings and continued through the March 20, 2012 public hearing. During that interval, staff gathered feedback from the Board of Commissioners, the MTW Advisory Board, the public housing Resident Leadership Council, and HCV participants. A version of this particular activity was presented as early as January 17, 2012. That version evolved into its present form as feedback was continuously incorporated into the proposal.
  - EIV(Earned Income Verification) will be used during the initial housing process and at subsequent recertifications

**B. Describe how each proposed activity relates to at least one of the three statutory objectives**

- Self-sufficiency

**C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective**

- Impact to Clients:
  - Only applies to new program participants

- Provides financial incentive immediately (instead of through escrow). This may reduce the disincentive to new employment associated with rent increases, but it may also reduce incentives to save money and build assets over the long term.
- Expands the amount of time that EID is available
- Increases number of individuals in household who can take advantage of EID
- Impact to Agency: Simplifies incentive and reduces costs associated with tracking start/stop process

**D. Describe baselines, proposed benchmarks, and metrics to assess outcomes, include anticipated schedules**

<b>Metric</b>	<b>Baseline</b>	<b>Benchmark</b>
Number of households participating in EID	40	80
Amount of income disregarded (average per year)	\$11,000	\$12,100
Number of household members who take advantage of disregard (average)	1 (head of household)	1.5 per household
Average length of time participants are employed during 60 months	0	40 months

**E. Describe the data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives**

Staff will continue to collect all employment/wages information for household, and establish baseline of participation. Staff will track changes of income and increases, for metrics and changes to baseline. The software system (Elite) is programed to automatically deduct at percentage rate for appropriate year. Case management provided will be tracked in TAAG.

**F. Authorization**

MTW Agreement Attachment C, Section B(1) (Single Fund Budget with Full Flexibility), specifically Section B(1)(b)(iii) referencing the provision of housing or employment-related services or other case management activities, and Section C(11) (Rent Policies and Term Limits) authorizing agency to establish earned income disallowances that differ from those in current statutes or regulations.

## FY2013-3: Standardize Section 8 and Public Housing Inspection Processes

### A. Description

- Makes Section 8 and Public Housing inspection standards the same
- The intent is to raise lower standards to a higher, uniform level. It is anticipated that UPCS (public housing) would serve as model for most elements, but some may be derived from HQS (section 8)
- Transition timeline is expected to last one year – full implementation expected in mid-2013

### B. Describe how each proposed activity relates to at least one of the three statutory objectives

- Reduce cost and increase cost effectiveness

### C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective

- Impact to Clients: Greater predictability regarding inspection outcomes
- Impact to Agency: Standardize contracting and services

### D. Describe baselines, proposed benchmarks, and metrics to assess outcomes, include anticipated schedules

Metric	Baseline	Benchmark
Final standards and procedures manual	None	Completion by May 1, 2013
Failure rate	TBD by research completed during production of standards and procedures manual	TBD by research completed during production of standards and procedures manual
Number of re-inspections of HCV units during transition period (June – Oct 2013)		
Number of re-inspections of HCV units after transition period (Oct 2013 – June 2014)		
Landlord participation		

**E. Describe the data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives;**

During the first year of this activity, data collection will be focused on research on best practices, communication with other agencies, establishment of SAHA priorities, and collaboration with partners, including landlords, to develop the new set of standards. Data will also be gathered from existing SAHA databases and other internal records to establish baselines that are meaningful to both public housing and HCV.

**F. Authorization**

MTW Agreement Attachment C, Section C(9) (Simplification of Property Management Practices) and Section D(5) (Ability to Certify Housing Quality Standards).

## FY2013-4: HQS Inspection and Rent Reasonableness Assessment of SAHA-owned non-profits by SAHA inspectors

### A. Description

- SAHA inspectors (instead of 3<sup>rd</sup>-party contractors) would be used to inspect SAHA-owned non-profits and related entities, and to perform rent reasonableness assessments

### B. Describe how each proposed activity relates to at least one of the three statutory objectives

- Reduce cost and increase cost effectiveness

### C. Identify and discuss the anticipated impact of each proposed MTW activity on the stated objective

- Impact to Agency: Cost savings estimated at \$55.46 per inspection

This figure is the projected result of replacing 3<sup>rd</sup>-party contractors with in-house inspectors. The current cost of contracting with a 3<sup>rd</sup>-party to conduct 2,391 inspections annually is \$182,478 per fiscal year. That translates into a cost per inspection of \$76.32. The cost per inspection using SAHA staff is estimated at \$20.86. The net savings per inspection is project to be \$55.46.

### D. Describe baselines, proposed benchmarks, and metrics to assess outcomes, include anticipated schedules

Metric	Baseline	Benchmark
Per unit cost of inspections and assessments	\$76.32 per inspection	Reduction of costs by \$55.46 per inspection by December 1, 2012

### E. Describe the data collection process and the proposed metrics the Agency will use to measure how this activity will achieve one or more of the MTW statutory objectives

Data collection for this activity will focus on tracking cost metrics, including generating quarterly reports on all internal costs associated with this activity, conducting market research to

determine the most up-to-date third-party costs, and comparing those figures to ensure that the agency is still experiencing cost savings.

**F. Authorization**

MTW Agreement Attachment C, Section B(1) (Single Fund Budget with Full Flexibility), specifically Section B(1)(b)(iv) referencing the provision of management services; MTW Agreement Attachment C, Section C(9) (Simplification of Property Management Practices); and Section D(5) (Ability to Certify Housing Quality Standards).



## **6. ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED**

<b>Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Update</b>
FY2011-1	Block grant funding with full flexibility	Increase housing options	Implemented in FY2010-2011 and ongoing
FY2011-1a	Promote Education through Partnerships	Increase self-sufficiency	Implemented in FY2010-2011 and ongoing
FY2011-1b	Pilot Child Care Program	Increase self-sufficiency	Implemented in FY2010-2011 and closed out
FY2011-1c	Holistic Case Management	Increase self-sufficiency	Implemented in FY2010-2011 and ongoing
FY2011-1d	Resident Ambassador Program	Increase self-sufficiency	Implemented in FY2010-2011 and ongoing
FY2011-1e	Preservation and expansion of affordable housing	Increase housing options	Implemented in FY2010-2011 and ongoing
FY2011-2	Simplify and streamline HUD approval process for the development, redevelopment, and acquisition of public housing	Increase housing options	In development
FY2011-3	Biennial recertification for public housing elderly/disabled	Reduce cost and increase cost effectiveness	Partially implemented in FY2010-2011, fully implemented in FY2011-2012, and ongoing
FY2011-4	Streamline methods of verification for public housing and HCV	Reduce cost and increase cost effectiveness	<p>Metrics eliminated</p> <ul style="list-style-type: none"> <li>• Cost of paper</li> <li>• Cost of postage per 3<sup>rd</sup> party</li> </ul> <p>Metrics added</p> <ul style="list-style-type: none"> <li>• Timely completion rate</li> </ul>

<b>Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Update</b>
FY2011-5	Requirements for acceptable documents for HCV and public housing	Reduce cost and increase cost effectiveness	<p>Metrics eliminated</p> <ul style="list-style-type: none"> <li>• Cost of paper</li> <li>• Cost of postage per 3<sup>rd</sup> party</li> </ul> <p>Metrics added</p> <ul style="list-style-type: none"> <li>• Timely completion rate</li> </ul>
FY2011-6	Commitment of project-based vouchers (PBV) to SAHA-owned or controlled units with expiring subsidies	Increase housing options	Partially implemented in FY2010-2011, and fully implemented in FY2011-2012, ongoing.
FY2011-7	Remove limitation of commitment on PBV so that PBV may be committed to more than 25% of the units in family developments without required provision of supportive services	Increase housing options	<ul style="list-style-type: none"> <li>• October 2011 first PBV families was selected from Local PBV Waiting List</li> <li>• 47 families have been contracted from October 2011-March 2012</li> <li>• 32% PBV vouchers obligated</li> <li>• 26% PBV vouchers utilization</li> <li>• 85% occupancy rate</li> <li>• Average family income: \$8,000</li> </ul>
FY2011-8	Revise mobility rules for PBV	Increase housing options	Implemented, move-out rate is currently 5%.
FY2011-9	Allocate set-asides of tenant-based vouchers for households referred by non-profit sponsors who will provide supportive services to those households	Increase housing options	Partially implemented
FY2012-10	Biennial Recertification for HCV Elderly/Disabled Participants on Fixed Income	Reduce cost and increase cost effectiveness	Implemented FY2011-2012 and ongoing
FY2012-11	Local Project Based Voucher Program for Former Public Housing Residents	Increase housing options	In development and scheduled for implementation in FY 2013

Notes:

- Activity name denotes plan year in which the activity was first identified. For example, activity FY2011-8 was first identified in plan year FY2010-2011.

- SAHA does not anticipate any changes, modifications, or additions to Attachment C authorizations, nor is SAHA using outside evaluators.

#### **A. Additional Update Information for Activity FY2011-1e, Affordable Housing Preservation & Expansion Policy, Fund, and 2-year Work Plan**

SAHA adopted an Affordable Housing Preservation & Expansion Policy on May 12, 2011. SAHA then adopted a 2-Year Work Plan to implement the Policy on August 11, 2011. The 2-year Work Plan identifies \$12 million of MTW funds for a Preservation & Expansion Fund, \$3.4 million of which is to be used for capital improvements to public housing in year one.

The following tables list 2-year Work Plan projects by year. There are two sources of funding for these projects: the Preservation & Expansion Fund and the CFP. For year one, fund amounts are expected to be \$3.4 million from the Preservation & Expansion Fund, and \$9.7 million from the CFP.

#### **Preservation & Expansion Fund Planning: Year 1 (through June 30, 2012)**

<b>Property</b>	<b>Work</b>	<b>Planned</b>	<b>Revised</b>	<b>Note</b>
Marie McGuire	Retrofit	\$5,000,000	\$5,371,300	In Progress
Blanco	Systems / Enclosures	\$1,500,000	\$1,135,000	In Progress
T. L. Shaley	Retrofit	\$2,960,000	\$2,960,000	In Progress
HB Gonzalez	Roofing	\$275,000	\$277,824	In Progress
Fair Ave	Roofing	\$600,000	\$600,000	In Progress
South San	Roofing	\$400,000	\$535,506	In Progress
South San	Drainage	\$275,000	\$375,000	In Progress
Sun Park	Roofing	\$366,000	\$366,000	In Progress
Pin Oak	--	--	--	Removed – Not Needed
Various Sites - Finish Out	Playgrounds	\$70,000	\$70,000	In Progress
O.P. Schnabel	Roofing	\$0	\$29,458	Moved up from year 2 / In Progress
Westway	Roofing	\$0	\$656,304	Moved up from year 2 / In Progress
	Contingency	\$1,654,000	\$723,608	

<b>TOTAL</b>		<b>\$13,100,000</b>	<b>\$13,100,000</b>	
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**Preservation & Expansion Fund Planning: Year 2 (through June 30, 2013)**

<b>Property</b>	<b>Work</b>	<b>Planned</b>	<b>Revised</b>	<b>Note</b>
Architectural and Engineering	Plans & Specs	--	\$590,628	RFQ In Progress
Alazan - Health & Safety	Site Work	\$290,000	\$250,000	Scheduled - Strategic Phase
Apache - Health & Safety	Site Work	\$120,000	\$110,000	Scheduled - Strategic Phase
Cassiano 606 - Health & Safety	Site Work	\$138,984	\$128,956	Scheduled - Strategic Phase
Cassiano 606 - Health & Safety	Site Lighting/Furnaces	\$182,300	\$152,000	Scheduled - Strategic Phase
Lincoln - Health & Safety	Roofing	\$171,500	\$161,500	Scheduled - Strategic Phase
Lincoln - Health & Safety	Porches	\$7,500	\$7,500	Scheduled - Strategic Phase
Matt Garcia - Health & Safety	Exteriors	\$310,000	\$280,000	Scheduled - Strategic Phase
Westway - Health & Safety	Site / Driveway	\$121,000	\$111,000	Scheduled - Strategic Phase
San Juan 608 - Health & Safety	Exteriors/Site	--	--	Redevelopment - Strategic Phase
Jewett Circle - Health & Safety	Safety Rails Roof HVAC	\$15,000	\$15,000	Scheduled - Strategic Phase
Fair Ave - Health & Safety	Site Work	--	--	Strategic Phase with Property Management
Olive Park - Health & Safety	Roofing	\$50,000	\$45,000	Scheduled - Strategic Phase
Village East - Health & Safety	Site Work	\$50,000	\$45,000	Scheduled - Strategic Phase
Christ The King - Health & Safety	Paint Exteriors/Fence	\$150,000	\$120,000	Scheduled - Strategic Phase
Williamsburg - Health & Safety	Site Work	--	--	To Be Implemented By Operations
Cassiano 620B - Site	Site Work	--	--	Strategic Phase with Property Management
San Juan 620A	Site Work	--	--	Redevelopment - Strategic Phase
Kenwood North – Exteriors	Exteriors	\$180,000	\$160,000	Scheduled - Strategic Phase
Fair Ave	Site Work	--	--	Strategic Phase with

<b>Property</b>	<b>Work</b>	<b>Planned</b>	<b>Revised</b>	<b>Note</b>
				Property Management
Pin Oak	Exteriors	\$300,000	\$250,000	Scheduled - Strategic Phase
Francis Furey	Retrofit	\$3,300,000	\$3,000,000	Scheduled - Strategic Phase
Charles C. Andrews	Retrofit	\$520,000	\$480,000	Scheduled - Strategic Phase
Contingency	--	--	--	--
<b>TOTAL</b>		<b>\$5,906,284</b>	<b>\$5,906,584</b>	

## **7. SOURCES AND USES OF FUNDING**

### **A. List planned sources (Operating, Capital, HCV) and uses of MTW funds;**

See next page.

<b>Proposed Consolidated Sources and Uses of MTW Funds</b>	
<b>Fiscal Year Ending June 30, 2013</b>	
<b>SOURCES</b>	
HCV Block Grant (HAP & Administrative Fees)	\$97,056,575
Public Housing Operating Subsidy	\$20,888,863
Public Housing Rental & Other Income	\$13,034,793
Public Housing Capital Grants	\$10,471,232
Replacement Housing Factor Grants - 2nd Increment <sup>1</sup>	\$4,588,690
<b>TOTAL SOURCES</b>	<b>\$146,040,153</b>
<b>USES</b>	
<b>Capital &amp; Other Priorities:</b>	
Public Housing Capital Uses	\$10,471,232
Capital Uses of MTW Reserve Funds (net of Self Sufficiency & HCV Activities)	\$5,000,000
<b>Operations:</b>	
Funding for three priorities (per note 4 below)	\$5,100,000
Replacement Housing Factor Grants - 2nd Increment (Other MTW uses) <sup>1</sup>	\$4,588,690
Salaries & Benefits	\$16,416,478
Repair & Maintenance	\$6,397,654
Utilities	\$5,782,538
Safety & Security	\$687,897
Insurance	\$1,331,491
Other Expenses (Includes technology/licensing fees, computer/telephone, consulting fees, etc...)	\$2,608,692
Management Fees	\$9,532,099
HAP Expense for HCV Program	\$89,811,678
Compliance Programs	\$213,763
Self-Sufficiency Activities including Grant Matching Funds	\$1,100,000
<b>TOTAL USES</b>	<b>\$159,042,212</b>
<b>TRANSFERS, RESERVES &amp; NET INCOME</b>	
MTW Reserve Drawdown/(Buildup)	\$13,002,059

**Footnote:**

<sup>1</sup> Per our discussions with HUD, Second Increment RHF will be used for Public Housing operating costs, Section 8 Housing Assistance Payment expenses so that the RHF obligation deadlines are met. Additional MTW funds will be used by the agency to advance our affordable housing and preservation goals at the San Juan site and other locations.

**Note:**

On 06/14/2012 the Board of Commissioners approved resolution 5274 which obligated funds consistent with our MTW plan:

1. Section 8 administrative funding shortfall - \$3.1 Million
2. Program administration and implementation of MTW initiatives; increase the number of participants in the PH and HCV FSS and the EID to over 1,200 participants; increase the number of Resident Councils by 10%; establish and expand educational programs for children and adults; explore opportunities to establish and expand health and wellness and arts and culture programs - \$1.1 Million
3. Expansion: Choice implementation matching grant for Wheatley Courts transformation - \$5.0 Million
4. Commit funds to three priorities: - \$5.1 Million
  - a) S8, to ensure levels of service and assistance do not diminish,
  - b) Initiatives to advance our self-sufficiency efforts, and
  - c) Housing preservation and expansion

**B. List planned sources and uses of State or local funds**

SAHA is not a recipient of State or Local funds.

**C. If applicable, list planned sources and uses of the COCC**

See next page.



<b>Consolidated Sources and Uses of Central Office Cost Center</b>		
<b>Fiscal Year Ending June 30, 2013</b>		
<b>SOURCES</b>		
Contract Billing	\$1,867,277	
Other Revenue	\$278,709	
Management Fee	\$5,905,079	
Bookkeeping Fee	\$1,937,139	
Asset Management Fee	\$1,114,000	
CFP Management Fee	\$741,033	
Fee for Service	\$1,283,533	
<b>TOTAL REVENUE</b>		<b>\$13,126,770</b>
<b>USES</b>		
Salaries and Benefits	\$10,127,688	
Repair & Maintenance	\$281,925	
Utilities	\$228,389	
Protective Salaries	\$268,417	
Insurance	\$191,642	
Other Expenses	\$2,164,299	
<b>TOTAL EXPENSES</b>		<b>\$13,262,360</b>
<b>NET INCOME/(LOSS)</b>		<b>(\$135,590)</b>

**D. If using a cost allocation or fee-for-service approach that differs from 1937 Act requirements, describe the deviations and the reasons therefore**

Not applicable.

**E. List or describe use of single-fund flexibility, if applicable, describe uses across traditional program lines or special circumstances in support of an MTW activity**

SAHA will combine the public housing, HCV Program and capital fund resources into a single authority-wide funding source with full funding flexibility. Over the coming year SAHA will use the single fund block grant to provide funding for:

- Operating fund subsidies to the public housing portfolio
- Capital Funds for the public housing portfolio
- HAP payments
- HCV administrative operating costs
- Other MTW Activities
- Development-related activities

**F. Optional - List reserve balances at beginning of the Plan year**

Not applicable.

**G. Optional - In Plan Appendix, provide planned sources and uses by AMP**

Not applicable.

**H. Initiatives**

This section of the MTW Plan describes specific initiatives associated with the agency's MTW Activities.

Comprehensive Resident Training and Employment Partnership

This initiative, proposed for FY 2012-2013, will identify and contract with strong employment training partners who can increase the number of SAHA clients entering the workforce.

This initiative expands on the success of previous activities FY2011-1a - Promote Education through Partnerships, and FY2011-1b - Pilot Child Care Training Program. Both were pilot partnerships with Alamo Colleges and Miller Child Development Center, respectively, that facilitated the attainment of a high school diploma, college credits toward a certificate program or an associate's degree, credits toward two years of college in preparation for education continuation at a four-year institution, or (in the case of the Child Care Training Program) specific certification.

The new initiative would expand two aspects of the program: A) the number of SAHA's partners who offer this kind of service, and B) the number of SAHA residents and participants who graduate from the program with a high-wage, long-term job.

This self-sufficiency initiative is focused on creating new employment and employment-training opportunities for SAHA residents and participants based on employer-defined needs. The additional and expanded partnerships are anticipated to offer more resources for SAHA's work-oriented client population.

<b>Metric</b>	<b>Baseline</b>	<b>Benchmark</b>
Signed partnership MOU	1	4 new or renewed MOUs per year
GED / high school diplomas received by participant	17	June 30, 2013: 37 June 30, 2014: 87
Job Training Completion	115	June 30, 2013: 235 June 30, 2014: 385
Individuals Employed	20	June 30, 2013: 40 June 30, 2014: 80
Percentage of high-wage jobs	0%	June 30, 2013: 10% June 30, 2014: 20%
Average length of term of employment	0 months	June 30, 2013: 6 months June 30, 2014: 12 months

Data for this initiative will be gathered using the Tracking at a Glance (TAAG) database and FSS monthly reporting spreadsheets, and any other mechanism detailed in individual MOUs.

Metrics were selected to measure progress at various stages:

- General Preparation (GED/Diploma)
- Specific Training
- Initial Employment
- Long-term tracking: Stakeholders emphasized that the focus of this activity should be long-term jobs and high-wage jobs. High-wage jobs are defined as at least living-wage plus 10%.

### Student Achievement Partnerships

This self-sufficiency initiative establishes partnerships that focus on the educational needs of children and youth in SAHA-assisted households. The partnerships facilitate access to educational resources dedicated to supporting students' academic success at various stages, including pre-K, school transitions, and pre-graduation. SAHA anticipates that health resources and programs will also play an important supportive role.

Over the long-term, SAHA expects this investment in the education of children to reduce the rate at which these children, as adults, require housing assistance. SAHA will also be looking for short-term impacts on family well-being and economics due to increased attention on children's needs and success.

During the initiative's first phase, SAHA will contract with partners associated with Promise/Choice Neighborhoods initiatives in the Wheatley Courts area to achieve benchmarks such as kindergarten readiness, academic performance, successful transitions from elementary to middle school to high school, career-readiness of high-school graduates, and children's health and nutrition.

During the subsequent expansion phase, SAHA will apply successful models to other SAHA properties.

Success will be measured using metrics that mirror those to which Promise and Choice have already made commitments. Data collection will be closely tied to Promise / Choice Neighborhood agreements, since data sharing and measurement is one of the key elements of both Promise and Choice Neighborhood initiatives.

## **8. ADMINISTRATIVE**

- A. Resolution signed by the Board of Commissioners, or other authorized PHA official if there is no Board of Commissioners, adopting the Annual MTW Plan Certification of Compliance (provided at the end of this Attachment B)**

See following pages.

- B. Description of any planned or ongoing Agency-directed evaluations of the demonstration, if applicable**

Not applicable.

SAN ANTONIO HOUSING AUTHORITY

APRIL 5, 2012

SAN ANTONIO HOUSING AUTHORITY

Resolution 5252

RESOLUTION 5252, AUTHORIZING THE FISCAL YEAR 2013 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY, THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN AND THE CAPITAL FUND PROGRAM AND AUTHORIZING THE EXECUTION OF DOCUMENTS IN CONNECTION WITH THE SUBMISSION OF THE PLANS, AND OTHER MATTERS IN CONNECTION THEREWITH.

WHEREAS, the Board of Commissioners of the San Antonio Housing Authority, a public instrumentality created pursuant to the laws of the State of Texas ("SAHA") approved the 2013 Moving to Work (MTW) Agency Plan for fiscal year 2013 including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan and the Capital Fund Program; and

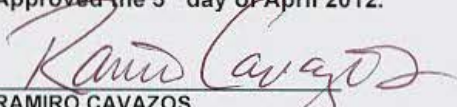
WHEREAS, the Board of Commissioners of the San Antonio Housing Authority now desires to authorize the submission of the 2013 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

WHEREAS, the Board desires to authorize the Chairman and the President and CEO to execute and submit to HUD such certifications and other documents that they deem necessary or advisable in connection with the submission of the MTW Agency Plan.


NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of SAHA hereby:

- 1) Approves Resolution 5252 authorizing Fiscal Year 2013 Moving to Work Agency Plan and revised MTW Plan, Public Housing and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan, and the Capital Fund Program, and their submission to HUD.

Approved the 5<sup>th</sup> day of April 2012.

  
 RAMIRO CAVAZOS  
 CHAIR, BOARD OF COMMISSIONERS

Attested and approved as to form:

  
 LOURDES CASTRO RAMIREZ  
 SAHA PRESIDENT AND CEO

Annual Moving to Work Plan  
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2012, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

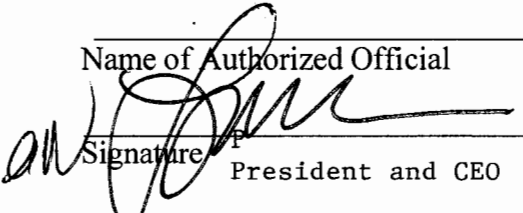
1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment 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 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.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The 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.
7. The 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.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The 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.

10. The 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.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the 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.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. The 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 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).
17. The 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.
18. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

San Antonio Housing Authority  
 PHA Name

TX006  
 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)

\_\_\_\_\_  
 Name of Authorized Official  
  
 Signature  
 President and CEO

President and CEO  
 \_\_\_\_\_  
 Title  
 4/13/12  
 \_\_\_\_\_  
 Date