



# **Moving to Work**

## **Annual MTW Plan- FY2015**

San Antonio Housing Authority | 818 S. Flores | San Antonio, TX 78204 | [www.saha.org](http://www.saha.org)

*Final Re-submission to HUD: August 20, 2014*

## **SAHA Board of Commissioners**

Ramiro Cavazos, Chairman  
Charles Muñoz , Vice Chairman  
Karina Cantu  
Yolanda Hotman  
Stella Burciaga Molina  
Morris Stribling, MD

## **SAHA Executive Staff**

Lourdes Castro Ramírez, President and Chief Executive Officer  
David Nisivoccia, Chief Operations Officer  
Ed Hinojosa, Chief Financial Officer  
Alejandra Villarreal, Chief Administrative Officer  
Melanie Villalobos, Policy, Planning, and Public Affairs Officer  
Tim Alcott, Interim Development Services and Neighborhood Revitalization Officer  
David Clark, Housing Director  
Deborah Aleman, Director of Assisted Housing  
Diana Kollodziej Fiedler, Director of Finance and Accounting  
Adrian Lopez, Director of Community Development Initiatives  
Muriel Rhoder, Internal Audit Manager  
Jo Ana Alvarado, Director of Information Technology  
Brad McMurray, Director of Development Services

## **SAHA Moving to Work Staff**

Richard L. Milk, Director of Planning and Policy  
Sara Eaves, GIS & MTW Program Analyst

## **Contributing SAHA Staff**

Gary Baxter, Madlyn Bowen, David Casso, Roman Castorena, Aiyana Longoria, Silvia Lozano, Ramiro Maldonado, Brandee Perez, Katherine Ramirez, Robert Ramirez, Thomas Roth, Susan Ramos-Sossaman, Jacquelyn Smith, and Katie Tran.

## Contents

I. Introduction.....	4
A. Overview of Short and Long-term MTW goals and objectives.....	5
B. Non-MTW Related Housing Authority Information.....	6
II. General Housing Authority Operating Information .....	17
A. Housing Stock Information.....	17
B. Leasing Information .....	23
C. Waiting List Information .....	23
D. Tables from 50900.....	24
III. Proposed MTW Activities .....	37
IV. Approved MTW Activities .....	99
A. Implemented Activities.....	99
B. Not Yet Implemented Activities.....	143
C. Activities On Hold .....	144
D. Closed Out Activities.....	145
V. Sources and Uses of Funds.....	148
VI. Administrative .....	154
Appendix 1: Resolutions and Certifications.....	156
Appendix 2: Annual Statement/Performance and Evaluation Report (HUD 50075.1) and Replacement Housing Factor (RHF) Plan - 2014/2015.....	160

## I. Introduction

The San Antonio Housing Authority (SAHA) provides housing to over 70,000 children, adults, and seniors through three housing programs – Public Housing, Housing Choice Vouchers, and mixed-income housing programs. SAHA employs approximately 500 people and has an annual operating budget of \$172 million. Existing real estate assets are valued at over \$500 million.

SAHA's involvement with Moving to Work (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.

The MTW designation provides SAHA with the flexibility to design and test innovative approaches to enhance the agency's programs. The MTW designation also provides funding flexibility by combining Public Housing operating subsidy, capital fund program (CFP) grants, and Housing Choice Voucher (HCV) program subsidies into a single fund block grant. The MTW program focuses on three goals:

- to reduce cost and achieve greater cost effectiveness in Federal expenditures
- to give incentives that promote self-sufficiency
- to increase housing choices for low-income families in San Antonio

This year's MTW Plan proposes four new activities and also proposes adjustments to existing activities to facilitate implementation, measurement, and/or reporting.

## **A. Overview of Short and Long-term MTW goals and objectives**

On June 25, 2012, the Board of Commissioners formally approved SAHA's new Strategic Plan. Three elements comprise the core of the plan: a new vision for the agency, a new mission statement, and a set of six strategic goals.

**Vision:**           **Create dynamic communities where people thrive.**

**Mission:**       **Provide quality affordable housing that is well-integrated into the fabric of neighborhoods and serves as a foundation to improve lives and advance resident independence.**

### **Strategic Goals**

- 1) Empower and equip families to improve their quality of life and achieve economic stability.
- 2) Invest in our greatest resource – our employees – and establish a track record for integrity, accountability, collaboration and strong customer service.
- 3) Preserve and improve existing affordable housing resources and opportunities.
- 4) Strategically expand the supply of affordable housing.
- 5) Transform core operations to be a high performing and financially strong organization.
- 6) Develop a local and national reputation for being an effective leader, partner, and advocate for affordable housing and its residents.

SAHA's MTW Plan and Strategic Plan are closely integrated. The Strategic Plan goals articulate and reinforce the three statutory MTW goals. At the same time, "Leverage MTW designation to transform core operations" is a specific objective under Goal 5 ("Transform core operations") of the Strategic Plan. Finally, at the Action level, each MTW Activity is directly incorporated into the Strategic Plan as a specific action item. Because of the tight integration between the plans, progress in any MTW Activity is automatically captured in Strategic Plan progress reports.

SAHA contracted with PlanBase in April 2013 to develop a dashboard tool to track progress on Strategic Plan goals and metrics. Dashboard implementation began in June 2013 when officers and directors developed initial metrics and action items for each of the six strategic goals.

As the first year of implementation draws to a close, Staff is reviewing Year 1 progress and taking stock of lessons learned. These lessons will be put to immediate use as staff prepares plans for the second full year of dashboard use, FY2014-2015. These Year 2 Plans will be finalized prior to July 1, 2014, and will take into account FY2014 outcomes, analysis of metric trends, any changes in targets, and budget discussions.

## **B. Non-MTW Related Housing Authority Information**

### **Supportive Housing**

In addition to MTW housing programs, SAHA offers affordable housing linked to accessible supportive services, including mental health, substance addiction, unemployment, and other support services that provide assistance for families and individuals to live more stable, productive lives. Supportive housing works particularly well for those facing complex life challenges, such as homelessness, HIV/AIDS, prison or jail release, and/or mental illness.

SAHA is committed to reducing homelessness in San Antonio through programs that provide affordable quality housing for homeless individuals and families. In an effort to provide quality assistance, the agency works with non-profit organizations and Continuum of Care (CoC) partners that offer services to address issues that affect client quality of life.

Below is a brief description of the agency's non-MTW supportive housing programs:

**Moderate Rehabilitation (Mod-Rehab) Program-** provides rent subsidy payments to private property landlords for select rental units that have been rehabilitated under this program. Subsidies provide housing assistance to homeless families and individuals as they transition into affordable housing. There are a total of 267 vouchers for families.

**Shelter Plus Care (S+C) and Special Needs Assistance Program (SNAP)** - provides rental assistance and supportive services for homeless families and individuals with disabilities, primarily those with serious mental illnesses, chronic problems due to alcohol or drug dependencies, and acquired immune deficiency syndrome (AIDS) or related diseases. There are 101 vouchers committed to S+C.

**Mainstream** – provides rental assistance for elderly and disabled households. Currently, there are 100 vouchers authorized for this program.

**HUD-VASH-** serves homeless veterans by combining the HCV rental assistance program with case management and clinical services provided by Veterans Affairs medical centers. There are presently 435 families authorized for assistance under this program.

## Choice Neighborhoods Initiative

San Antonio's Eastside features a unique history, valued institutions, established churches, small businesses, and a core group of dedicated and loyal residents. The San Antonio Housing Authority (SAHA) is utilizing the \$30 million EastPoint Choice Neighborhoods Initiative grant from the Dept. of Housing and Urban Development (HUD), to transform the Wheatley Courts area into a "community of choice" -- a safe, healthy, vibrant, thriving community for children, families and seniors.

The Choice Neighborhood Initiative invests in People, Housing and Neighborhood through transforming distressed neighborhoods into viable and sustainable mixed-income neighborhoods by linking housing and infrastructure improvements with much-needed services, such as quality schools, healthcare, transportation, and access to jobs.

The **People** outcomes focus on families' health, education, safety, and employment, through efforts to encourage and support self-sufficiency and job readiness, and to facilitate access to early childhood and adult education. The **Housing** plan is to redevelop Wheatley Courts into a 417-unit energy efficient, mixed-income community, and to expand the supply of quality housing with 208 new housing units at The Park at Sutton Oaks. The **Neighborhood** component will: transform the neighborhood of poverty into a safe, pedestrian-oriented neighborhood, with homeownership opportunities; develop a plan to grow business and retail opportunities; and improve access to health and wellness activities and resources.

The key Choice partners include the City of San Antonio (CoSA), McCormack Baron Salazar, Inc., Urban Strategies, Inc., United Way of San Antonio and Bexar County (Eastside Promise Neighborhood), San Antonio Independent School District (SAISD), St. Philip's College and San Antonio for Growth on the Eastside (SAGE).

A few of the key first-year Choice accomplishments include: relocation of 201 Wheatley Courts families completed in February 2014 (92% of Wheatley children remain in SAISD); substantial completion of the 208 new housing units at The Park at Sutton Oaks; University Health System has committed to establishing a health facility in the area; secured \$3.6 million from the City of San Antonio for FY2014 infrastructure improvements; and the City and County have committed \$10 million to the Menger Creek Project channel improvements, linear park, and pedestrian bridge.

San Antonio is the only community in the nation to receive a Promise Zone designation, as well as all three of the White House Neighborhood Revitalization Initiative grants, which, in addition to Choice, includes a \$23.7 million grant from the Dept. of Education to bolster children's educational achievement and foster community development, and two Byrne Criminal Justice grants, totaling nearly \$1 million, to improve safety and security in the neighborhood.

## People

The outcomes for Wheatley Courts residents will be achieved through comprehensive, on-site case management, that will facilitate access to quality early childhood education, after-school programs and adult education, as well as improved employment opportunities, with a particular emphasis on expanding job readiness, training and placement programs. The initial assessments indicated that only 12% of Wheatley residents have attended college or received a college degree, 49% have a high school diploma or GED, 39% have no high school diploma or GED, and 51% are unemployed. The People objectives for the Choice effort include: able-bodied adults working; pathways for education and workforce success; resident and community stakeholders able to organize and lead; healthier lifestyles for residents; and programs with a sustainable approach and framework.

## Housing

The Housing plan to develop a total of 625 high-quality, energy-efficient, mixed-income units is being implemented in four phases. Phase I includes 208 units at The Park at Sutton Oaks, which is now substantially complete. Phase II includes 220 units for families, and is due to begin construction in January 2015, with completion planned for December 2016. Phase III features 80 units for seniors, with construction scheduled to begin September 2015, and completion planned for December 2016. The final and fourth phase includes 117 units for families, which is scheduled to begin September 2016, and be completed by December 2017. The housing development and related infrastructure improvements will be funded through public-private partnerships, featuring a combination of federal, state, and city funding, as well as private equity.

## Neighborhood

**Safety and Security**, the leading concern of residents in this community, is being addressed through a Byrne Criminal Justice Innovation [BCJI] grant. An initial research survey indicated: twice as many crimes committed in the footprint vs. County or City; twice as many residents on probation vs. County or City; and a higher level of violent and drug crime. Community meetings resulted in the following strategies: develop hot spot policing along key streets; address root causes of crime (substance abuse); increase workforce development activities; establish resident empowerment activities; and focus on solutions courts and working with restitution participants.

**Access to Healthcare** is a primary concern for the Choice area. An assessment of neighborhood health conditions has recently been completed. The assessment found that area residents suffer from: high rates of childhood obesity, diabetes, teen pregnancy, infant mortality rates, asthma, lead poisoning and sexually-transmitted diseases. A few of the study recommendations include: community access to safe and adequate spaces for physical activity, ensure cultural competency for area healthcare staff; and coordinate with local partners to provide healthy nutrition options in accessible locations and at affordable prices.

**Economic Development** is a key component of the greater revitalization and long-term success of the Eastpoint community. An Economic Development Committee has developed a plan for the area, which includes: provide assistance to existing businesses; attract a diversity of new businesses; create a vibrant commercial corridor that accommodates business activity and supports local residents; re-brand the community's image to attract the interest of the greater San Antonio community; and promote income diversity.

**The Infill Housing and Rehabilitation Strategy** is a key component to address the pervasive neighborhood deterioration. The strategy involves land acquisition and investment for new homes, owner-occupied home repair, and property improvement by landlords. This strategy will be implemented in partnership with the City and County, utilizing a place-based approach by expanding homebuyer assistance, increasing opportunities for owner-occupied housing rehabilitation assistance, and reducing the shortage of affordable rental housing options.

## **Section 32, HOPE VI Mirasol / Westside Housing Reinvestment Initiative**

In March 2014, staff submitted an application to HUD for the demolition/disposition of 39 boarded up, vacant, residential homes in the Blueridge subdivision. Staff estimates 90 business days for HUD approval (June/July 2014).

The timeline of actions includes:

1. July - September 2014: Reuse/recycle (partnership with Habitat for Humanity) and demo contractor
2. October 2014 through 2016: rebuilding

Home Ownership Program staff will market properties to numerous groups ranging from realtors and lenders to professional groups (e.g. teachers, nurses, etc.). Two model homes will be built to assist with marketing efforts. Lots will be sold to selected builders. Homes will be built as homebuyers are qualified. New house designs/floor plans have been developed for this neighborhood.

The list of properties (39 houses and one vacant lot) is included below:

<b>No.</b>	<b>Address</b>	<b>1 or 2 Story</b>	<b>Floor Plan</b>	<b>Added Issues with Unit</b>
1	1611 NW 26th St.	1-Story	A 1204.1	Elect./Plumb./Mold
2	1515 NW 26th St.	1-Story	B 1206.3	Elect./Plumb.
3	1507 NW 26th St.	1-Story	C 1206.3	Found./Elect./Plumb.
4	102 Villa Grande	1-Story	B 1206.1	Elect./Plumb.
5	110 Villa Grande	1-Story	A 1204.1	Elect./Plumb.
6	114 Villa Grande	1-Story	B 1206.2	Elect./Plumb.
7	122 Villa Grande	1-Story	A 1204.1	Elect./Plumb.
8	126 Villa Grande	1-Story	A 1204.2	Elect./Plumb./Mold
9	134 Villa Grande	1-Story	B 1206.3	Elect./Plumb./Mold
10	111 Villa Grande	1-Story	B 1206.3	Found./Elect./Plumb.
11	103 Villa Grande	1-Story	C 1206.2	Elect./Plumb.
12	102 Villa Arboles	1-Story	B 1206.3	Found./Elect.
13	118 Villa Arboles	1-Story	B 1206.1	Elect.
14	122 Villa Arboles	1-Story	C 1206.1	Elect.
15	126 Villa Arboles	1-Story	A 1204.3	Elect./Plumb.
16	130 Villa Arboles	1-Story	A 1204.2	Elect./Plumb.
17	138 Villa Arboles	1-Story	C 1206.2	Elect./Plumb.
18	2631 Villa Norte	1-Story	B 1206.H	Elect./Plumb.
19	139 Villa Arboles	1-Story	C 1206.3	Interior, fixtures
20	135 Villa Arboles	1-Story	C 1206.1	Plumb.
21	131 Villa Arboles	1-Story	B 1206.2	Elect. (min.)/Plumb.
22	127 Villa Arboles	1-Story	A 1204.1	Elect./Plumb./Mold
23	119 Villa Arboles	1-Story	C 1206.2	Found./Elect./Plumb.
24	115 Villa Arboles	1-Story	A 1204.2	Elect/Plumb/Found/Mold
25	1002 NW 27th St.	1-Story	B 1206.H	Elect./Plumb.

26	1006 NW 27th St.	1-Story	C 1206.2	Found./Elect./Plumb.
27	1010 NW 27th St.	1-Story	C 1206.1	Elect./Plumb.
28	1014 NW 27th St.	1-Story	B 1206.2	Elect./Plumb./Mold
29	1022 NW 27th St.	1-Story	B 1206.3	Elect.
30	1511 NW 26th St.	2-Story	A 1500.1	Elect./Plumb.
31	147 Villa Arboles	2-Story	A 1700.2	Plumb.
32	123 Villa Arboles	2-Story	C 1500.1	Found.
33	111 Villa Arboles	2-Story	A 1700.1	Plumb.
34	1206 NW 27th St.	2-Story	A 1700.2	Plumb./Mold
35	1523 NW 26th St.	2-Story	B 1503.1	DECON UNIT
36	130 Villa Grande	2-Story	A 1700.1	BURNED UNIT
37	110 Villa Arboles	1-Story	A 1204.3	DECON UNIT
38	143 Villa Arboles	1-Story	B 1206.1	DECON UNIT
39	2627 Villa Norte	2-Story	A 1503.3	VACANT LOT
40	107 Villa Arboles	1-story	B 1206.1	Interior, fixtures

As of April, forty-nine (49) houses in the Sunflower, Palm Lake and Villas de Fortuna neighborhoods are being assessed for future development as detailed below.

TX006000036	Sumtner Subdivision	132	SF0009	4	1518 Villa Flores	San Antonio	TX	78237
TX006000036	Sumtner Subdivision	132	SF0010	3	1519 Villa Flores	San Antonio	TX	78237
TX006000036	Sumtner Subdivision	132	SF0012	3	1523 Villa Flores	San Antonio	TX	78237
TX006000036	Sumtner Subdivision	132	SF0016	3	1710 Villa Placer	San Antonio	TX	78237
TX006000036	Sumtner Subdivision	132	SF0017	3	1714 Villa Placer	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0003	4	311 Villa Rosa	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0004	3	315 Villa Rosa	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0005	3	602 Villa Linda	San Antonio	TX	78237
TX006000036	Palm Lake Subdivision	133	PL0006	3	606 Villa Linda	San Antonio	TX	78237
TX006000036	Palm Lake Subdivision	133	PL0008	3	610 Villa Linda	San Antonio	TX	78237
TX006000036	Palm Lake Subdivision	133	PL0009	4	611 Villa Linda	San Antonio	TX	78237
TX006000036	Palm Lake Subdivision	133	PL0010	3	614 Villa Linda	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0011	3	615 Villa Linda	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0012	3	618 Villa Linda	San Antonio	TX	78237
TX006000050	Palm Lake Subdivision	133	PL0013	3	619 Villa Linda	San Antonio	TX	78237
TX006000036	Palm Lake Subdivision	133	PL0014	3	623 Villa Linda	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0001	3	402 Precious Drive	San Antonio	TX	78237
TX006000050	Villa De Fortuna Subdivis	134	VF0005	4	410 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0006	3	411 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0009	3	418 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0012	3	423 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0014	3	427 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0019	3	439 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0020	3	440 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0021	3	443 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0022	3	444 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0023	3	447 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0024	3	448 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0026	3	452 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0027	3	455 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0028	3	458 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0029	3	459 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0030	3	462 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0031	3	463 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0033	3	467 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0034	4	470 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0035	5	471 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0036	3	475 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0038	3	503 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0039	3	506 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0040	4	507 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0043	5	514 Precious Drive	San Antonio	TX	78237
TX006000050	Villa De Fortuna Subdivis	134	VF0045	5	518 Precious Drive	San Antonio	TX	78237
TX006000036	Villa De Fortuna Subdivis	134	VF0046	3	519 Precious Drive	San Antonio	TX	78237

## **"J" Street Properties (526, 614, 622 "J" Street)**

As per guidelines, staff ordered appraisals for these properties and listed them on the multiple listing service for 30 days. An offer has been received on one property as of April 2014. The properties are for sale "as is".

## **Sale of Other SpringView Section 32 Scattered Sites**

SAHA is planning to market and sale of other properties included in the *SAHA SpringView Section 32 PIC Inventory* detailed below:

AMP NUMBER	DEVELOPMENT NAME	DEVELOPMENT NUMBER	Unit/ d	Bedrooms	Unit Address	Unit City	Unit State	Zip Code
TX006000031	Springview Replacement Ho	125	HP0100	3	2622 Commerce	San Antonio	TX	78203
TX006000031	Springview Replacement Ho	125	HP0101	3	238 Corliss	San Antonio	TX	78220
TX006000031	Springview Replacement Ho	125	HP0102	3	614 J. St	San Antonio	TX	78203
TX006000031	Springview Replacement Ho	125	HP0105	3	622 J. St	San Antonio	TX	78220
TX006000031	Springview Replacement Ho	125	HP0107	3	518 Corliss	San Antonio	TX	78220
TX006000031	Springview Replacement Ho	125	HP0109	3	126 Ferris	San Antonio	TX	78220
TX006000031	Springview Replacement Ho	125	HP0110	3	526 J. St	San Antonio	TX	78220
TX006000050	Springview Replacement Ho	125	HP0114	3	622 H Street	San Antonio	TX	78203
TX006000031	Springview Ho	36A	SV1006	4	2835 Del Rio	San Antonio	TX	78203
TX006000031	Springview Ho	36A	SV1008	3	2806 Del Rio	San Antonio	TX	78203
TX006000031	Springview Ho	36A	SV1014	4	2858 Wyoming	San Antonio	TX	78203

## **Sale of Excess Assets**

SAHA is considering the sale of excess assets from its property inventory. A 12.2 acre tract from a larger 18 acre tract located within the SpringView redevelopment at Hedges and Martin Luther King is currently under contract with an anticipated closing date in August 2014. SAHA is also evaluating the benefit of other potential sales from the property list upon staff recommendation and SAHA Board of Commissioner approval. Potential homes, lots and large parcels under consideration include those in the *SAHA Large Parcel Property inventory* and *SAHA Non-PIC Scattered Sites Inventory* detailed below:

## SAHA Large Parcel Property inventory

Vacant Parcels for Development	Council	Owner	Acreage	Area (sf)	Value *Estimate	Comment
The estimated value noted in itaics is the comparable value from a similar tract in the neighborhood and/or a recent appraisal. An individual appraisal of each vacant tract is recommended. The bold lines indicate appraisal in the past year.						
550 Brooklyn	1	SAHA	2.58	112,384	\$ 3,316,260.00	BCAD Value -Rex Site
Sutton 909 Runnels	2	SAHA	1.945	84,724	\$ 169,448.00	Wheatley Choice
SpringView 2730 E. Commerce	2	SAHFC	1.3	56,628	\$ 118,919.00	
SpringView 2830 E. Commerce	2	SAHFC	2.4	104,544	\$ 219,542.00	
SpringView 2944 E. Commerce	2	SAHFC	2.4	104,544	\$ 219,542.00	
SpringView 700 Garcia St.	2	SAHA	3.3	143,748	\$ 891,238.00	Vacant Admin Bldg.
SpringView Garcia @ R.R. Track	2	SAHA	3	130,680	\$ 143,748.00	
<b>SpringView Hedges @ MLK</b>	<b>2</b>	<b>SAHA</b>	<b>18</b>	784,000	\$ 1,646,856.00	<b>*12.02 acres appraised for IDEA School @ \$1.1M</b>
SpringView 903-937 Hedges	2	SAHA	1.9	82,764	\$ 173,804.00	
SpringView 651 S. Rio Grande	2	SAHA	5	217,800	\$ 457,380.00	
SpringView 200 S. Rio Grande	2	SAHA	2.4	104,544	\$ 219,542.00	
4843 Lord Road	2	SAHFC	26.38	1,149,112	\$ 2,413,137.00	
<b>200 Tampico</b>	<b>5</b>	<b>SAHA</b>	<b>3.763</b>	<b>163,916</b>	<b>\$ 1,025,000.00</b>	<b>11.25.13 Appraisal, vacant warehouse</b>
<b>1310 S. Brazos</b>	<b>5</b>	<b>SAHFC</b>	<b>5.01</b>	<b>218,255</b>	<b>\$ 2,000,000.00</b>	<b>10.17.13 Appraisal, semi-vacant warehouse</b>
3940 San Fernando	5	SAHA	9.68	421,660	\$ 843,322.00	VCP w/TCEQ environmental
7770 Ingram Rd.	6	SAHDC	8.92	388,555	\$ 777,110.00	
5700 Culebra Rd.	7	SAHDC	12.56	547,113	\$ 1,094,227.00	
1706 Cincinnati	7	SAHDC	0.54	23,522	\$ 43,250.00	4.4.08 Appraisal - LURA?
7223 Snowden Rd.	8	SAHFC	6.97	303,613	\$ 607,226.00	Hunt Development Selected
<b>Subtotals</b>					<b>\$ 16,379,551.00</b>	

## SAHA Non-PIC Scattered Sites Inventory

SCATTERED SITES VACANT-LOTS (5)										
PROPERTY ADDRESS	OWNER	COUNCIL DISTRICT	STATUS	ACERAGE	SQ. FT	BCAD VALUE	APPRAISAL AMOUNT	DATE LAST APPRAISAL	C A N #	COMMENT
7250 GLEN MIST	SAN ANTONIO HOMEOWNERSHIP OPP CORP		RTC VAC-LOT	0.056	1,069.00	\$ 19,500.00	\$ 2,300.00	3/17/2006	05703-102-0540	AUCTION LOT NO SELL
517 GRIMES	SAN ANTONIO FACILITY CORP	2	SPRINGVIEW VAC-LOT	0.1066	4,682.00	\$ 25,300.00	\$ 5,500.00	2/19/2007	01518-002-0130	AUCTION LOT NO SELL
515 SAN GABRIEL	SAN ANTONIO HOUSING FINANCE CORP	5	RTC VAC-LOT	0.1354	5,900.00	\$ 21,500.00	\$ 5,500.00	5/6/2005	08660-008-0280	AUCTION LOT NO SELL
635 CORLISS	SAN ANTONIO HOUSING	2	VACANT LOT	0.1403	6,111.00	\$ 9,780.00			10682-005-0080	AUCTION PROP NO SELL SPRINGVIEW/HOPE VI
1011 YUCCA	SAHA	2	SPRINGVIEW VAC-LOT	0.1779	7,750.00	\$ 6,300.00			10710-029-0160	AUCTION LOT NO SELL
SCATTERED SITES VACANT-HOUSES (2)										
PROPERTY ADDRESS	OWNER	COUNCIL DISTRICT	STATUS	ACERAGE	SQ. FT	BCAD VALUE	APPRAISAL AMOUNT	DATE LAST APPRAISAL	C A N #	COMMENT
6211 BROWNLEAF	SAN ANTONIO HOMEOWNERSHIP OPP CORP	6	VACANT HM	0.1263	5,500.00		\$ 66,000.00	2012	15405-001-0270	
1071 POINSETTIA ST	SAHA	2	VACANT HM	0.1607	7,000.00	\$ 27,440.00			09545-004-0040	AUCTION PROP NO SELL SPRINGVIEW HOPE VI NEED TO CLEAR TITLE
ARTISAN PARK TOWN HOMES (3)										
PROPERTY ADDRESS	OWNER	COUNCIL DISTRICT	STATUS	ACERAGE	SQ. FT	BCAD VALUE	APPRAISAL AMOUNT	DATE LAST APPRAISAL	C A N #	COMMENT
512 REFUGIO	LAS VARAS PUBLIC FAC. CORP	1	VACANT HM	0.0395	1,720.62	\$169,110.00			00866-003-0060	AFFORDABLE
530 REFUGIO	LAS VARAS PUBLIC FAC. CORP	1	VACANT HM	0.0386	1,681.42	\$164,480.00			00886-003-0150	AFFORDABLE
411 SANTA CLARA	LAS VARAS PUBLIC FAC. CORP	1	VACANT HM	0.0329	1,433.12	\$221,620.00			00886-002-0050	MARKET
Rental Properties										
4846 MELVIN	SAN ANTONIO HOUSING FIN	2	OCCUPIED	0.1205	5,250.00	\$ 66,240.00			12880-003-0121	NEED UPDATED CONTRACTS FOR
9411 STRECH	SAN ANTONIO HOMEOWNERSHIP	4	OCCUPIED	0.1435	6,250.00	\$ 86,150.00			11132-033-3313	NEED UPDATED CONTRACTS FOR
211 E THEO	SAN ANTONIO HOUSING FIN CORP	3	OCCUPIED	0.1917	8,350.00	\$ 24,150.00			03225-011-0120	NEED UPDATED CONTRACTS FOR LEASE/RENTAL

### Sale of Tampico Site

The Tampico Warehouse is located at 200 Tampico Street and is included in the HUD AMP which includes the Alazan/Apache courts public housing development. The site area is 3.763 acres or 163,916 square feet. However, a portion of the property is located in the 100 year flood plain, so the usable area is 3.624 acres or 157,853 square feet. The site is improved with a 9,600 square foot office/warehouse. However, the building has been severely vandalized and was given no value in the appraisal report dated June 6, 2012 which valued the site at \$1,025,000.

The intent is to liquidate this excess property that is not critical to the implementation of SAHA's Strategic Plan. The disposition application states that net sale proceeds will be leveraged to sustain existing Public Housing units and/or develop new affordable housing for low-income households over the coming years.

### **Victoria Park**

As part of the completion of the redevelopment of the former Victoria Courts Public Housing site now known as Victoria Commons, SAHA is working with the City of San Antonio to finalize a land swap agreement. The idea is to re-purpose a 1-acre city park located on the heavily traveled Cesar Chavez Boulevard into a mixed-finance residential development. In exchange, SAHA would set aside a 1.95-acre parcel in a more resident-friendly site within Victoria Commons. The new park site would be adjacent to the former Victoria Courts Administration Building that will be redeveloped as a community and cultural arts center, and closer to the interior of the Lavaca neighborhood.

### **Public Housing Scattered Sites**

SAHA currently operates 163 single family housing units at 163 scattered sites throughout the city of San Antonio. SAHA is currently evaluating a possible disposition of all or a portion of this portfolio due to the high cost of managing and maintaining these units. If a disposition strategy is pursued and approved by HUD, net sale proceeds will either be invested in capital repair/replacement projects for other public housing assets or used to acquire additional affordable housing units that complement SAHA's 2020 Strategic plan.

## II. General Housing Authority Operating Information

### **A. Housing Stock Information**

As detailed in the tables below, during plan year 2014-15, SAHA plans to add 63 new Public Housing units as part of the San Juan Phase 3 development project. SAHA also plans to remove 248 Public Housing units as part of the Wheatley Choice Neighborhood redevelopment project.

SAHA will project-base 180 new housing choice vouchers, 31 of those at San Juan Phase 3. Another 100 will be distributed among up to 4 properties that respond to an RFP for Permanent Supportive Housing proposals. Ten (10) will support Wheatley redevelopment, and 39 will be committed to Victoria Commons. Further details for each of these projects is provided below.

No other housing stock changes are anticipated during the 2014-2015 fiscal year.

#### **San Juan Phase 3**

San Juan Phase III is the third and final phase of the demolition and reconstruction of San Juan Homes. This project will have 252 residential units (12 of which are designated as live/work spaces) for individuals and families in San Antonio. The property will also include 4,000 square feet of commercial/retail space. The plan creates a neighborhood where families live, work and shop, with a mix of retail space and social services at the property. The new project design creates community connectivity between all three phases and potential economic development in the area. The site design includes walking trails and a park with a plaza space usable by both residents and the neighborhood at large. The design concept will create an environment for healthy living and promote use of outdoor spaces.

The 252 units are all walkup units and composed of:

- 12 - one bedroom
- 132 - two bedroom
- 92 - three bedroom
- 16 - four bedroom

The property will consist of 63 public housing units, 27 HOME units, 131 tax credit only units and the 31 project based voucher units.

All the public housing units will be rented to tenants whose incomes are at 30% AMI. Twenty seven (27) units will be dedicated as HIGH HOME units all of which will be rented to tenants whose incomes are at 60% AMI or less and 50% AMI in some cases for LOW HOME units. Thirty one (31)

of the units will be dedicated for project based voucher units. These units will qualify for tax credit units.

The PHA has determined that the site has been selected for inclusion of PBV based on the goal of deconcentration of poverty and the expansion of both housing and economic opportunities as consistent with the agency MTW Plan. In addition the project will include 4200 square foot of commercial / retail space to promote economic development within the neighborhood.

The two census tracts this project is in have a poverty rate greater than 20%. The PHA has been working on the redevelopment of San Juan Homes (Phase 1 and 2) for the past nine (9) years. The area has seen a decline of poverty within the last six (6) years. The commercial spaces in the surrounding neighborhood have leased up during this period. A number of public meetings were held and the neighborhood is very excited and ready for the transformation of this last Phase III.

Community Housing Resource Partners (CHR Partners) has agreed to provide supportive resident services for the proposed San Juan Square Apartment Homes III family development. The proposed services will be provided as per the State of Texas Department of Housing and Community Affairs requirements, and include:

- Nutrition Counseling
- Health Screening and Fairs
- Budget and Financial Literacy
- Tax Preparation
- After School Programming, tutoring, homework assistance, etc.

An initial Fair will serve as a catalyst for events over the next 12 months. Monthly events such as “How to Feed a Family of 5 a Nutritious Dinner for less than \$15” will combine nutrition counseling and budgeting. Local credit unions will be invited to discuss banking basics. CHR Partners will identify nearby sites with Volunteer Income Tax Assistance (VITA) volunteers during income tax season. CHR Partners will partners with local hospitals and dental clinics to provide diabetes, blood pressure and AIDs testing as well as affordable dental care on site. After school programming will be provided in the form of “anti-bullying and anti-drug” seminars, homework help via volunteers, and other programs which will focus on hygiene, safety, and self-esteem.

## **RFP for Permanent Supportive Housing**

This RFP will project-base 100 vouchers among up to 4 properties, in support of Permanent Supportive Housing.

The specific properties will be identified during the RFP process. The vouchers will be targeted to the following types of households:

- a) Chronically homeless individuals, with special preference give to projects that serve frequent users of multiple public systems of care, such as homeless shelters, jail, hospitals, detox, and emergency rooms,
- b) Homeless families
- c) Young adults ages 18-24 aging out of foster care, and
- d) High need homeless individuals who do not meet the formal HUD definition for chronicity.

Each property must commit at least 10 units(vouchers) per property.

SAHA requests that properties responding to the RFP meet the following criteria.

- 1) Be accessible to social, recreational, educational, commercial and health care facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted standard housing of similar market rents.
- 2) Be located so that travel time cost via public transportation or private automobile is not excessive form the neighborhood to places of employment providing a range of jobs.
- 3) Meet the site and neighborhood standards required by HUD.

The properties selected must also provide a range of on-going support and assistance to help tenant identify goals and needs, develop plans to address them, and gain access to appropriate community-based resources. The goal of services must be to provide flexible support that responds to ongoing housing stability and episodic crisis needs of the participants in a manner that enables them to live as independently as possible.

Supportive services should be in accordance with the Supportive Housing's 2013 Dimensions of Quality guidebook.

SAHA expects to award at least 50 vouchers for chronically homeless singles, at least 20 vouchers for families, and at least 20 vouchers for young adults aged 18-24 aging out of foster care. The remaining 10 vouchers may be targeted to any of the preceding populations, or to homeless single individuals who do not meet the chronically homeless definition as established by HUD.

## **Wheatley Choice Neighborhood Initiative**

The San Antonio Housing Authority was awarded a \$29.7 million Choice Neighborhood Implementation grant on December 13, 2012 for the revitalization of Wheatley Courts and the surrounding neighborhood. The housing redevelopment plan is to demolish Wheatley Courts, a 246-unit obsolete, inefficient, inaccessible, and unsafe public housing site, into a 417-unit, high quality, mixed-income community. The revitalization plan will result in one-for-one replacement of the public housing units and will ensure long-term affordability in a diverse, mixed-income community.

The first on-site phase, for which 9% Low Income Housing Tax Credits are being sought, will include 215 mixed income family units on three and one half blocks consisting of one, two, three and four bedroom garden apartments, and two, three and four bedroom townhouse apartments with related exterior site amenities. The development will also include 5 live/work units for self-employed families.

The types of units provided by this project include:

- Phase II 220 units:
  - Market rate: 64
  - Tax Credit only 60% or below: 60
  - Tax Credit PBV: 10
  - Tax Credit HOME: 15
  - Tax Credit PHU: 71
  
- Phase III 80 units:
  - Market rate: 0
  - Tax Credit only 60% or below: 4
  - Tax Credit PBV: 28
  - Tax Credit HOME: 0
  - Tax Credit PHU: 48
  
- Phase IV 117 units:
  - Market Rate: 55
  - Tax Credit only 60% or below: 6
  - Tax Credit PBV: 6
  - Tax Credit HOME: 16
  - Tax Credit PHU: 34

The total number units at the property, by Phase, are:

- Phase I = 208
- Phase II = 220
- Phase III = 80
- Phase IV = 117

Wheatley Courts is located in San Antonio's eastside neighborhood. There are several revitalization efforts underway in this area. Collectively, these initiatives are coordinated by the EastPoint Coordinating Committee, chaired by Mayor Ivy Taylor. EastPoint encompasses three program areas: 1) the Wheatley Courts Choice Neighborhood, 2) the EastPoint Promise Zone, and 3) the Eastside Promise Neighborhood.

EastPoint is the only area in the United States to receive awards for three separate Federal programs under the White House Neighborhood Revitalization Initiative (NRI): it is a HUD Choice Neighborhood, a Department of Education Promise Neighborhood, and a Department of Justice Byrne grantee. The Choice Neighborhoods Initiative is a central part of the NRI, an interagency partnership between HUD and the Departments of Education, Health and Human Services, Justice, and Treasury to support locally driven solutions for transforming distressed neighborhoods. The NRI acknowledges the interconnectedness of many factors in revitalization, including housing, education, adequate infrastructure, economic development, and safety, and promotes breaking the Federal government "red tape" to coordinate revitalization efforts locally. While the Wheatley Courts Choice Neighborhoods plan serves as the Community Revitalization Plan for the neighborhood surrounding Wheatley Courts, it was developed with the hope of receiving HUD CNI funds as one of the initial investments in the area and an early step toward revitalization.

By coupling the many NRI initiatives with local support, the City of San Antonio is orchestrating a collaborative effort aimed at de-concentrating poverty and improving the opportunities for individuals living in the eastside of San Antonio.

Supportive services to be offered include:

- a) Intensive Case Management
- b) Employment & Skills Training
- c) Adult Education
- d) Children and Youth Programs
- e) Health Services
- f) Safety Program

### **Victoria Commons Chavez Multifamily**

Victoria Commons is the redevelopment of the former 660-unit Victoria Courts Public Housing Development. Previous completed phases include the 210-unit mixed-income multifamily Refugio Apartments; the 245-unit mixed-income multifamily HemisView Village Apartments, the 120-unit for sale Artisan Park Townhomes (22 units completed, 98 planned), and the planned 26 single family for sale Leigh Street Homes. The final phase currently known as Victoria Commons Chavez Multifamily will be a 215-unit mixed-income mixed-use multifamily/retail development.

The Victoria Commons Chavez Multifamily project will include:

- 133 market units
- 43 units at or below 60% AMI
- 39 PBV

The total number units at the property will be 215.

Victoria Commons is the redevelopment of the former Victoria Courts that included 660 Public Housing units. It is located in the highly desirable Lavaca Neighborhood where the real estate market has been identified as one of the hottest in the country in previous national articles. The site is part of a primarily single family residential neighborhood close to many amenities and downtown.

The project will include a full time activities director and offer supportive services for affordable residents that include after school activities, weekly exercise classes, twice a month on-site social events (i.e. potluck dinners, game night, movie nights, birthday parties, etc.) , annual income tax preparation, monthly food pantry/ common household items, annual health fairs, quarterly health and nutrition courses.

### **General Description of All Planned Capital Fund Expenditures During the Plan Year**

During the plan year (7/1/14 to 6/30/15), SAHA plans to invest \$5,070,000 for capital repairs and replacements at the following Public Housing Properties:

<b>Property Name</b>	<b>Budgeted Expenditure</b>
Charles Andrews	\$2,879,484
Le Chalet	\$1,277,670
Morris Beldon	\$912,870

The scope of work is still be developed but will include site improvements (BLI 1450), Dwelling Structures (BLI 1460), Dwelling Equipment (BLI 1465), which will extend the useful life expectancy and preserve existing affordable housing stock. Funding will be from a combination of Moving to Work (MTW) and Capital Fund Program (CFP) resources.

## **B. Leasing Information**

As detailed in the tables in Section D below, SAHA plans to serve 18,349 MTW households in fiscal year 2014-2015, through both public housing and MTW Housing Choice Vouchers.

SAHA has not been out of compliance with any of the required statutory MTW requirements.

SAHA does not anticipate any issues related to leasing Public Housing or Housing Choice Vouchers.

## **C. Waiting List Information**

As detailed in the tables in Section D below, SAHA has nearly 46,000 households on three waiting lists. Those lists will stay open during the plan year.

## D. Tables from 50900

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

### Attachment B

#### (II) General Housing Authority Operating Information

#### Annual MTW Plan

#### II.1.Plan.HousingStock

#### A. MTW Plan: Housing Stock Information

#### Planned New Public Housing Units to be Added During the Fiscal Year

AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
TX 00 60 00 05 5	0	3	3	2	3	0	0	63	General	3	14

San Juan Phase 3														
n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0
n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0
n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0
n/a	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Total Public Housing Units to be Added

63

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

If Other, please describe:

n/a

**Planned Public Housing Units to be Removed During the Fiscal Year**

PIC  
De  
v.  
#/  
A  
M  
P  
an  
d  
PI  
C  
De  
v.  
Na  
m  
e

Number  
of  
Unit  
s to  
be  
Rem  
ove  
d

Explanation for Removal

TX0060 00 00 2	248	Choice Neighborhood Implementation Grant
Wheatley		
n/a	0	n/a
n/a	0	n/a

**Total  
Number  
of  
Units  
to  
be  
Re-  
m-  
ov-  
ed**

248

**New Housing Choice Vouchers to be Project-Based During the Fiscal Year**

Property Name	Anticipated Number of New Vouchers to be	Description of Project
---------------	--	------------------------

Project-Base d \*

San Juan Phase 3

31

The San Juan Phase III is the third and final phase of the demolition and reconstruction of San Juan Homes. As envisioned, this project will have 252 residential units (12 of which are designated as live/work spaces) for individuals and families in San Antonio, the property will also include 4,000 square feet of commercial/retail space. The plan creates a neighborhood where families live, work and shop, with a mix of retail space and social services at the property. The new project design creates community connectivity between all three phases and potential economic development in the area. The site design includes walking trails and a park with a plaza space usable by both residents and the neighborhood at large. The design concept will create an environment for healthy living and promote use of outdoor spaces.

252 units - Walkup units:

12 - one bedroom

132 - two bedroom

92 - three bedroom

16 - four bedroom

Of the total amount of units the property will consist of 63 public housing units, 27 HOME units, 131 tax credit only units and the 31 project based voucher units.

Sixty three (63) of the units will be dedicated as public housing units (PH); all of which will be rented to tenants whose incomes are at 30% AMI. Twenty seven (27) units will be dedicated as HIGH HOME units all of which will be rented to tenants whose incomes are at 60% AMI or less and 50% AMI in some cases for LOW HOME units. Thirty one (31) of the units will be dedicated for project based voucher units. These units will qualify for tax credit units.

The PHA has determined that the site has been selected for inclusion of PBV based on the goal of deconcentration of poverty and the expansion of both housing and economic opportunities as consistent with the agency MTW Plan. In addition the project will include 4200 square foot of commercial / retail space to promote economic development within the neighborhood.

The two census tracts this project is in have a poverty rate greater than 20%. The PHA has been working on the redevelopment of San Juan Homes for the past nine (9) years and since the due to the redevelopment to date that includes Phase I and Phase 2 alone, the area has seen a decline of poverty within the last six (6) years. The original Commercial spaces in the area have leased up during this period within the neighborhood at large. A number of public meeting were held and the neighborhood is very excited and ready for the transformation of this last Phase III

Supportive services to be offered:

Community Housing Resource Partners (CHR Partners) has agreed to provide supportive resident services for the proposed San Juan Square Apartment Homes III family development. The proposed services will be provided as per the State of Texas Department of Housing and Community Affairs requirements, and include:

- Nutrition Counseling
- Health Screening and Fairs
- Budget and Financial Literacy
- Tax Preparation
- After School Programming, tutoring, home work assistance, etc.

An initial Fair will serve as a catalyst for events over the next 12 months. Monthly events such as "How to Feed a Family of 5 a Nutritious Dinner for less than \$15" will combine nutrition counseling and budgeting. Local credit unions will be invited to discuss banking basics. CHR Partners will identify nearby sites with Volunteer Income Tax Assistance (VITA) volunteers during income tax season. CHR Partners will partners with local hospitals and dental clinics to provide diabetes, blood pressure and AIDs testing as well as affordable dental care on site. After

		<p>school programming will be provided in the form of “anti-bullying and anti-drug” seminars, homework help via volunteers, and other programs which will focus on hygiene, safety, and self esteem.</p>
Up to 4 Properties	100	<p><b>Property Information:</b> Property have not been identified.</p> <p><b>Types of household served:</b> The vouchers will be targeted to the following individuals below.</p> <ul style="list-style-type: none"> <li>a) Chronically homeless individuals, with special preference give to projects that serve frequent users of multiple public systems of care, such as homeless shelters, jail, hospitals, detox, and emergency rooms,</li> <li>b) Homeless families</li> <li>c) Young adults ages 18-24 aging out of foster care, and</li> <li>d) High need homeless individuals who do not meet the formal HUD definition for chronicity.</li> </ul> <p><b># of units at each property:</b> Each property must commit at least 10 units(vouchers) per property.</p> <p><b>Location of properties:</b> SAHA request the properties awarded meet the following criteria.</p> <ul style="list-style-type: none"> <li>1. Be accessible to social, recreational, educational, commercial and health care facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted standard housing of similar market rents.</li> <li>2. Be located so that travel time cost via public transportation or private automobile is not excessive form the neighborhood to places of employment providing a range of jobs.</li> <li>3. Meet the site and neighborhood standards required by HUD.</li> </ul> <p><b>Supportive Services:</b></p> <p>The properties selected must provide a range of on-going support and assistance to help tenant identify goals and needs, develop plans to address them, and gain access to appropriate community-based resources. The goal of services must be to provide flexible support that responds to ongoing housing stability and episodic crisis needs of the participants in a manner that enables them to live as independently as possible.</p> <p>Supportive services should be in accordance with the Supportive Housing’s 2013 Dimensions of Quality guidebook.</p> <p>Additional information regarding the allocation of the 100 vouchers. SAHA expects to award at least 50 vouchers for chronically homeless singles, at least 20 vouchers for families, and at least 20 vouchers for young adults aged 18-24 aging out of foster care. The remaining 10 vouchers may be targeted to any of the preceding populations, or to homeless single individuals who do not meet the chronically homeless definition as established by HUD.</p>
Wheatley	10	<p>1. general contextual/property information</p> <p>The San Antonio Housing Authority was awarded a \$29.7 million Choice Neighborhood Implementation grant on December 13, 2012 for the revitalization of Wheatley Courts and the surrounding neighborhood. The housing redevelopment plan is to demolish Wheatley Courts, a 246 unity. obsolete, inefficient, inaccessible,</p>

and unsafe public housing site, into a 417-unit, high quality, mixed-income community. The revitalization plan will result in one-for-one replacement of the public housing units and will ensure long-term affordability in a diverse, mixed-income community.

The first on-site phase, for which 9% Low Income Housing Tax Credits are being sought in this application, will include 215 mixed income family units on three and one half blocks consisting of one, two, three and four bedroom garden apartments, and two, three and four bedroom townhouse apartments with related exterior site amenities. The development will also include 5 live/work units for self-employed families.

2. types of households served

Phase II 220 units:

Market rate: 64

Tax Credit only 60% or below: 60

Tax Credit PBV: 10

Tax Credit HOME: 15

Tax Credit PHU: 71

Phase III 80 units:

Market rate: 0

Tax Credit only 60% or below: 4

Tax Credit PBV: 28

Tax Credit HOME: 0

Tax Credit PHU: 48

Phase IV 117 units:

Market Rate: 55

Tax Credit only 60% or below: 6

Tax Credit PBV: 6

Tax Credit HOME: 16

Tax Credit PHU: 34

3. total number units at the property

Phase I = 208

Phase II = 220

Phase III = 80

Phase IV = 117

4. location of the property (quality of neighborhood/any effects on deconcentration)

The proposed project, Wheatley Courts, is located in San Antonio's eastside neighborhood. There are several revitalization efforts underway in this area. Collectively, these initiatives are coordinated by the EastPoint Coordinating Coordinating, chaired by Mayor Julian Castro and referred to as the "EastPoint Initiative." EastPoint encompasses three program areas: 1) the Wheatley Courts Choice Neighborhood, 2) the EastPoint Promise Zone, and 3) the "Eastside Transformation Neighborhood." A map attached to this letter shows the location of these efforts within San Antonio and how the geographic area for each initiative overlaps.

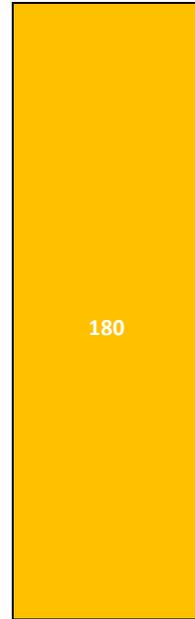
EastPoint is the only area in the United States to receive awards for three separate Federal programs under the White House Neighborhood Revitalization Initiative (NRI): it is a HUD Choice Neighborhood, a Department of Education Promise Neighborhood, and a Department of Justice Byrne grantee. The Choice Neighborhoods Initiative is a central part of the NRI, an interagency partnership

		<p>between HUD and the Departments of Education, Health and Human Services, Justice, and Treasury to support locally driven solutions for transforming distressed neighborhoods. The NRI acknowledges the interconnectedness of many factors in revitalization, including housing, education, adequate infrastructure, economic development, and safety, and promotes breaking the Federal government “red tape” to coordinate revitalization efforts locally. While the Wheatley Courts Choice Neighborhoods plan serves as the Community Revitalization Plan for the neighborhood surrounding Wheatley Courts, it was developed with the hope of receiving HUD CNI funds as one of the initial investments in the area and an early step toward revitalization.</p> <p>By coupling the many NRI initiatives with local support, the City of San Antonio is orchestrating a collaborative effort aimed at de-concentrating poverty and improving the opportunities for individuals living in the eastside of San Antonio.</p> <p style="text-align: center;">5. supportive services to be offered Intensive Case Management Employment &amp; Skills Training Adult Education Children and Youth Programs Health Services Safety Program</p>
Victoria Commons Chavez Multifamily	39	<p>1. general contextual/property information - Victoria Commons is the redevelopment of the former 660-unit Victoria Courts Public Housing Development. Previous completed phases include the 210-unit mixed-income multifamily Refugio Apartments; the 245-unit mixed-income multifamily HemisView Village Apartments, the 120-unit for sale Artisan Park Townhomes (22 units completed, 98 planned), and the planned 26 single family for sale Leigh Street Homes. The final phase currently known as Victoria Commons Chavez Multifamily will be a 215-unit mixed-income mixed-use multifamily/retail development.</p> <p>2. types of households served: 133 units - market, 43 units at or below 60% AMI; and 39 PBV</p> <p>3. total number units at the property: 215</p> <p>4. location of the property (quality of neighborhood/any effects on deconcentration): Victoria Commons is the redevelopment of the former Victoria Courts that included 660 Public Housing units and the located in the highly desirable Lavaca Neighborhood where the real estate market has been identified as one of the hottest in the country in previous national articles. The site is part of a primarily single family residential neighborhood close to all required amenities and employment centers.</p> <p>5. supportive services to be offered: The project will a full time activities director and offer supportive services for affordable residents that include after school activities, weekly exercise classes, twice a month on-site social events (i.e. potluck dinners, game night, movie nights, birthday parties, etc.) , annual income tax preparation, monthly food pantry/ common household items, annual health fairs, quarterly health and nutrition courses.</p>

Anticipated Total New Vouchers to be Project-Based



Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year



Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year



\*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

**Other Changes to the Housing Stock Anticipated During the Fiscal Year**

n/a
n/a
n/a

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

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

During the plan year (7/1/14 to 6/30/15), SAHA plans to invest \$5,070,000 for capital repairs and replacements at the following Public Housing Properties:

Property Name Budgeted Expenditure

Charles Andrews \$2,879,484

Le Chalet \$1,277,670

Morris Beldon \$912,870

The scope of work is still be developed but will include site improvements (BLI 1450), Dwelling Structures (BLI 1460), Dwelling Equipment (BLI 1465), which will extend the useful life expectancy and preserve existing affordable housing stock. Funding will be from a combination of Moving to Work (MTW) and Capital Fund Program (CFP) resources.

**II.2.Plan.Leasing**

**B. MTW Plan: Leasing Information**

**Planned Number of Households Served at the End of the Fiscal Year**

MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***

Federal MTW Public Housing Units to be Leased	5,851	70,207
Federal MTW Voucher (HCV) Units to be Utilized	12,498	149,978
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	n/a	n/a
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	n/a	n/a
<b>Total Households Projected to be Served</b>	<b>18349</b>	<b>220185</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 12.

\*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.

\*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

**Reporting Compliance with Statutory MTW Requirements**

If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.

n/a

**Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions**

**Housing Program**

**Description of Anticipated Leasing Issues and Possible Solutions**

Public Housing	None
HCV	None
n/a	n/a

**II.3.Plan.WaitList**

**C. MTW Plan: Wait List Information**

**Wait List Information Projected for the Beginning of the Fiscal Year**

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
-------------------------	------------------	-----------------------------------	---	--

Federal MTW Housing Choice Voucher Program	Community-Wide	33,049	Open	Remains Open
Public Housing	Site-Based	8,850	Open	Remains Open
Project-Based Local (Springhill)	Site-Based	4,058	Open	Remains Open

Rows for additional waiting lists may be added, if needed.

\* *Select Housing Program:* Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

\*\* *Select Wait List Types:* Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

\*\*\* For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

n/a
n/a
n/a

If Local, Non-Traditional Housing Program, please describe:

n/a
n/a
n/a

If Other Wait List Type, please describe:

n/a
n/a
n/a

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

n/a
-----

## III. Proposed MTW Activities

### FY2015-1 - MDRC / HUD Rent Study

#### **Introduction**

San Antonio Housing Authority (SAHA) has been selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the “Study”). MDRC, a nonprofit and nonpartisan education and social policy research organization, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency
- Simplify the administration of the HCV Program
- Reduce housing agency administrative burden and costs
- Improve accuracy and compliance of program administration
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under traditional rules
- Improve transparency of the program requirements

A computer generated program will randomly select approximately 2000 participants for the Study from the pool of eligible vouchers. The Study Group vouchers (approximately 1000) will be managed using the proposed policies. The Control Group vouchers (also approximately 1000) will be managed using the existing policies. Eligible participants in both the Study and Control Groups will include only those with vouchers that are administered under the Moving To Work (MTW) Program and not currently utilizing a biennial certification. Non-MTW Vouchers (i.e., Veterans Affairs Supportive Housing, Moderate Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and HUD Project Based Vouchers are excluded from the Study. Additionally, the Study is focused on work-able populations and will not include Elderly Households; Disabled Households, and households headed by people older than 56 years of age (who will become seniors during the course of the long-term study). Households currently participating in Family Self-sufficiency and Homeownership programs will not be included in the Study. Households currently using the childcare expense deduction to determine the annual adjusted income will not be included in the Study. Households that contain a mix of members with an immigration status that is eligible for housing assistance and immigration status that is non-eligible for housing assistance would not be included in the Study.

## I. Description of Rent Reform Components

The Study is designed to test an alternative strategy to standard HUD operating rules for the HCV program. The proposed alternative rent policies will include the following five key features:

- 1) Simplify income determination and rent calculation of the household's Total Tenant Payment (TTP) and subsidy amount by:
  - a) Eliminating deductions and allowances,
  - b) Changing the percent of income from 30% of adjusted income to a maximum of 28% of gross income,
  - c) Ignoring income from assets when the total households asset value is less than \$25,000, and
  - d) Using retrospective gross income, i.e., 12-month "look-back" period and, in some cases, current/anticipated income in estimating a household's TTP and subsidy.
  - e) Capping the maximum initial rent burden at 40% of current gross monthly income.
- 2) Conduct triennial income recertification rather than annual recertification with provisions for interim recertification and hardship remedies if income decreases.
- 3) Streamline interim certifications to eliminate income review for most household composition changes and moves to new units.
- 4) Require the TTP is the greater of 28% gross annual income (see #1 above) or the minimum rent of \$100. A portion of the TTP will be paid directly to the landlord.
- 5) Simplify the policy for determining utility allowances.

Additionally, the Study will offer appropriate hardship protections to prevent any Study Group member from being unduly impacted as discussed in Section V below.

### A. Description of the Rent Reform Activity

#### 1) Simplified Income Determination and Rent Calculation

Under the current HUD regulations, the total tenant payment (TTP) is a calculation derived from the voucher household's 30% adjusted monthly income (gross income less HUD prescribed deductions and allowances). SAHA follows a process of interviewing the household to identify all sources of income and assets, then proceeds to verify the information and perform the final calculation. The process is complex and cumbersome, which increases the risk of errors. According to HUD's Occupancy Handbook, Chapter 5 "Determining Income and Calculating Rent," the most frequent errors found across PHA's are: Voucher holders failing to fully disclose income information; errors in identifying required income exclusions; and incorrect calculations of deductions often resulting from

failure to obtain third-party verification. The complexity makes the HCV program less transparent and understandable by the public, landlords, and voucher holders.

## 2) Elimination of Deductions

*SAHA proposes a new method of calculation, which eliminates the calculation of deductions and allowances in the determination of annual income.*

### a) *Percent Annual Gross Income.*

The Total Tenant Payment (TTP) rent calculation will be determined by establishing gross annual income and then determining the greater of 28% of the gross annual income or the minimum rent of \$100.

### b) *Elimination of Income from Assets valued less than \$25,000*

SAHA will eliminate the verification and calculation of income earned from household assets with a total value less than \$25,000. Households would not be required to document assets worth less than that amount. This will reduce administrative costs and simplify the program for greater transparency and program compliance.

### c) *Review of Retrospective Income.*

To establish annual income for the three year certification period, SAHA will review the total household income without deductions for the twelve-month period prior to recertification, i.e., the “Retrospective Gross Income.” A household’s annual income will depend on its *Retrospective Gross Income* during a 12-month “look back” period.

At the certification, if a household’s current/anticipated income is less than its retrospective gross income by more than 10%, a “temporary” TTP based on current income alone will be set for six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average retrospective gross income. No interim recertification interview would be required to reset this TTP.

### d) *Capping the Initial Maximum Rent Burden*

HUD places a rent maximum for households moving into a new unit under the housing choice voucher subsidy. This maximum rent burden is determined to be 40% of the household’s adjusted annual income. However, under the Rent Reform Study the PHA will no longer be adjusting household income using deductions and allowances. The household must not pay more than 40 percent of gross current monthly income for the family share when the family first receives voucher assistance in a particular

unit. (This maximum rent burden requirement is not applicable at reexamination if the family stays in place).

### 3) Triennial Certifications

SAHA currently performs re-certification of HCV households on an annual basis. The annual certification will review program eligibility, household composition, income and other household circumstances. Additional re-examinations (“interim certifications”) may be required for changes in the household situation such as: composition, income, and change in unit.

SAHA proposes performing re-certification of the Study Group every third year (triennial). The triennial certification will review program eligibility, household composition, current income and income over the past twelve months (“retrospective income”), unit information and shall set the Total Tenant Portion (TTP) and the household share of the rent. The TTP for the Study Group will remain in effect during the three year certification period, with some exceptions related to decreases in income and changes in household.

Under the alternative rent policy, a household’s annual gross income will be determined using its reported (and verified) *retrospective gross income* during a 12-month “look-back” period. (In this calculation, gross income will exclude any prior income from sources that have expired for the household during that period, such as TANF or Unemployment Insurance benefits, since the household can no longer count on them. It will include imputed welfare income – i.e., any sanctioned portion of a household’s TANF grant). Income from household members removed from the voucher will also be excluded from the review of retrospective income. SAHA will create a local version of HUD form 9886 to provide tenant consent for SAHA to collect information relevant to the triennial recertification period.

If the household has an increase in income between certifications, the household’s TTP will not be re-determined and increased to reflect the higher income. However, if the household has a decrease in income, the household may request and SAHA may provide an interim re-certification or other remedies under the hardship process (see Section V). The interim re-certification will be conducted when a household has a reduction of income of more than 10% from the retrospective gross income.

- a) SAHA interim certification will re-calculate the household TTP based on a new retrospective gross income review to determine the greater of 28% of the retrospective gross income or the minimum rent of \$100. This retrospective gross income will establish the TTP that will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one

interim is permitted begins on the effective date of the triennial recertification and ends 12 months later.

- b) At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective gross income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.
- c) The Study Group will be allowed one request per year for an interim certification to reset their TTP. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. The TTP will only be reset if a household's new retrospective monthly income (at the time of the request) is more than 10% lower than its most recent prior retrospective gross monthly income. If the limit on interim certification presents a hardship, the household will need to apply for a Hardship Exemption (See Section V below).

#### 4) Streamline Interim Certifications

SAHA will institute a streamlined interim certification process for the Study Group to report change of circumstance that does not require adjustment in subsidy. For these events, SAHA will not request income information. These events include:

- a) Changes to household composition. The Study Group must report both additions and removal of members to the household to SAHA to determine program eligibility and other HUD required reporting (e.g. deceased tenant reporting). However, unless the addition of an adult member changes the voucher bedroom size appropriate for the household composition to prevent overcrowding or over-housing, SAHA will not request income information for the new household member until the next scheduled triennial certification.

If the loss of a household member results in a reduction of more than 10% of the most recent retrospective gross income, the household will be allowed to reset their TTP.

In the event that the new or removed member requires a change to the voucher bedroom size, SAHA will review the retrospective gross income of the newly added or removed household members, apply a new utility allowance, and will reset the household TTP. A reduction in subsidy for new voucher bedroom size will be implemented when the current lease ends and new lease begins.

Changes to household composition will not be counted towards the limit of one requested interim certification per year.

- b) Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, SAHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. However, unless the request for move is due to a change in household composition, SAHA will not request income information or reset the household TTP until the sooner of the next scheduled triennial certification or tenant requested interim certification to reset TTP. SAHA will apply new utility allowance schedule, if any, to the household at the new lease effective date.
- c) Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:
- Change their contract rent,
  - Recertify and the TTP is recalculated during interim or triennial,
  - Move to new units, or
  - Change their household composition requiring a change in voucher size.

#### 5) Minimum Rent to Owner

Currently, HUD does not require minimum rents to be paid by the voucher holder to the landlord. SAHA is proposing that Study Group members will be required to make a minimum payment of at least \$100 direct to the HCV landlord in addition to SAHA's portion of rent (Housing Assistance Payment "HAP"). The total amount of rent will equal the contract rent established in the lease. This policy mirrors the market system of tenants paying owners directly and creates a closer relationship and sense of responsibility for both the leaseholder HCV household and the property owner.

The amount of rent to owner the Study Group will pay is equal to their TTP less the Utility Allowance plus any amount over the payment standard for which the tenant may be responsible to pay. The Study Group rent to owner will not be less than the minimum rent. In the event that the Study Group household TTP less the Utility Allowance is less than the minimum rent, the household will pay the Owner the minimum rent and SAHA will reimburse the household the balance of the Utility Allowance. However, if the minimum rent to owner exceeds 40% of the household current/anticipated gross income, the household may request a Hardship Exemption as detailed in Section V below.

#### 6) Simplified Utility Allowance Schedule.

Currently, SAHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents the reasonable expectation of costs for utilities as part of the tenant’s lease.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from SAHA’s existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the triennial certification or change of unit.

SAHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying Utility Allowance Schedule. The simplified utility allowance schedule is also anticipated to benefit property owners who will have a more accurate understanding of the total gross rent to be applied to their properties and to the Study Group members who will be able to use this new schedule to clarify gross rent in their selection of housing units.

This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher rather than the larger of the actual unit size or the voucher size. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

**Proposed Flat Utility Allowance**

<b>Bedroom Size</b>	<b>Flat Rate</b>
0	\$ 75
1	\$ 94
2	\$124
3	\$174
4	\$214
5	\$277
6	\$290
7	\$333

## **B. Achieving Statutory Objectives**

- 1) MTW Objective: To reduce administrative cost and achieve greater costs effectiveness in Federal expenditures.

- a) *Simplified Tenant Rent Calculation*

This activity will provide SAHA with immediate savings of staff hours from the calculation of deductions, allowances, and income from household assets with a total value at less than \$25,000. Households would not be required to document assets worth less than that amount. This activity will also provide SAHA with saving in staff hours from detecting and correcting errors calculating the adjusted annual income.

- b) *Triennial Certification Schedule and Streamline Interim Certification*

These re-certification schedules will provide SAHA with immediate savings of staff hours and agency resources associated with the recertification processes.

- c) *Minimum Rent/TTP*

This activity sets the minimum rent to \$100 which is above HUD's current optional minimum rent of \$50 and the agency's current minimum rent of \$50. This minimum rent will reduce some HAP subsidy and save federal funds.

- d) *Simplified Utility Allowance*

This activity will provide SAHA with cost savings from staff hours spent on detecting and correcting errors made when applying the utility schedule based on voucher size, household structure, appliances, and other factors.

- 2) MTW Objective: To assist families achieve greater self-sufficiency by allowing families to keep this income to increase savings and attain greater self-sufficiency.

- a) *Simplified Tenant Rent Calculation*

The elimination of income from household assets valued less than \$25,000 will enable Study Group members to use this income as a means to attain greater self-sufficiency rather than increasing their portion of the rent.

- b) *Triennial Certification Schedule*

This activity will enable Study Group members to keep increases in income between the certification periods that would otherwise be "lost" through higher TTPs. As a result, it is expected to increase Study Group members' employment rates and earnings and help them attain greater self-sufficiency.

## **C. Anticipated Impact on the Stated Objectives**

### 1) Simplified Rent Calculation

This activity will provide SAHA with immediate savings of staff hours through an easier calculation in regular certification meetings and interim recertification meetings and save staff from having to detect and correct errors in calculating adjusted income. Also this will increase transparency of how the tenant's share of shelter costs are computed.

### 2) Triennial Certification

This activity will provide SAHA with immediate savings of staff hours and save tenants time as well through having fewer recertification meetings and income verifications. Also for tenants this will act as a powerful incentive to increase employment and earnings; tenants will be able to increase earnings between regular certifications without increases in their TTP and without having to report these increased earnings to SAHA.

### 3) Streamline Interim Certification

This activity will provide SAHA with savings in staff hours through eliminating income verification in some instances that would require it now. Also the streamlined certifications help to maintain the employment and earnings incentive offered in the 3-year recertification schedule.

### 4) Minimum Rent to Owner

This activity will increase self-sufficiency of tenants by establishing a traditional tenant-landlord relationship in which all tenants will be required to pay some portion of the rent directly to the landlord. This also may help with housing quality by establishing a traditional relationship where the tenant and landlord are interacting more and make the tenant feel more able to ask for repairs on the unit.

### 5) Simplified Utility Allowance

This activity will provide SAHA with cost savings from staff hours spent calculating utility allowances for each household and save time from detecting and correcting errors made when using a more complex utility schedule. This will also increase the transparency of the utility allowance calculation, enabling a better understanding of how their total subsidy is calculated.

## **D. Anticipated Schedules for Achieving the Stated Objectives**

Once the MTW Activity is approved, eligible participants will be identified for enrollment in the Study Group and the Control Group. The enrollment process for the Study Group and Control Group will begin approximately in September of 2014 -and end as soon as all Study

participants are enrolled. The Triennial recertification process for the groups will begin in September 2017 and end no later than 2019. Further information on the enrollment process is provided in Section VII – Transition Process.

1) Simplified Rent Calculation

Study Group members will be enrolled during their regularly scheduled certification meeting and presented with the simplified approach to rent calculation. This policy is intended to create simplicity and greater understanding of how the tenant portion of rent is determined which should impact upon the tenants at their initial certification.

The Agency will receive immediate benefits of staff time savings by not performing verification processes for the standard deductions and allowances which will no longer be applied to the Study Group members.

2) Triennial Certification

Study Group members will have the initial baseline triennial certification performed at the initial enrollment meeting. Study Group members will not participate in a recertification until three years after this initial certification, unless they request an Interim Certification or a Hardship remedy.

Administrative cost savings to SAHA will be achieved in the second year of the Study at which time SAHA will conduct the annual recertification for the control Group and will bypass the Study Group members.

3) Streamline Interim Certification

This activity limits the ability of Study Group members to request interim certifications to reset the household TTP to no more than once per year and only when the reduced retrospective household income more than 10% than the retrospective income used to determine the TTP. Study Group members may request interim certifications to report changes in household composition throughout the three year Study period. These recertifications will be streamlined and will exclude reexamination of household income or redetermination of household TTP.

The streamlined certification activity is anticipated to result in a cost savings to SAHA within the first year of implementation because there will be a reduced number of interim certifications for changes in household income and streamlined processes to handle changes in household composition and request to move certifications.

4) Minimum Rent to Owner

The requirement for the voucher holder to pay a minimum rent to owner will begin with the effective date of the initial Study enrollment certification. This first triennial certification will

determine the greater of the Total Tenant Payment of 28% of the household gross income or the newly established minimum rent (as described above).

However, the final benefit of this activity may not be assessed until the second triennial certification to determine whether the Study Group members were able to achieve higher earnings and thereby reduce the amount of subsidy.

5) Simplified Utility Allowance

The Simplified Utility Allowance will begin at the time of enrollment in the Study. The Study Group members will have the new utility allowance applied at the time of their initial triennial certification and thereafter at each triennial certification or certification for a move to a new unit. This activity is intended to create simplicity and greater understanding by the household of the utility allowance. It will benefit both the tenant and prospective landlord by establishing the allowed rate prior to selecting a unit. The Agency will receive immediate benefits of staff time savings by not creating and having to correct errors discovered in the application of the utility allowances.

## **II. Activity Metrics**

### **A. HUD Standard Metrics**

The information in the table shaded blue represents information intended for guidance; while the information in non-shaded boxes represents SAHA specific information. For purpose of this section, year one represents the first fiscal year where activities are implemented.

<b>CE #1: Agency Cost Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Total cost of task in dollars.	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
<b>Cost per Annual Certification</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>\$12,657.50</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>\$12,657.50</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>\$12,657.50</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>\$37,972.50</b></p> <ul style="list-style-type: none"> <li>• <b>Baseline Time to calculate annual certification: 830 hours</b></li> <li>• <i>Times average staff wage: \$15.25</i></li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>\$5,947.50</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>\$5,947.50</b> Savings is equal to: <b>\$32,025.00</b></p> <ul style="list-style-type: none"> <li>• <b>Benchmark Time to calculate annual recertification: 390 hours</b></li> <li>• <i>Times average staff wage: \$15.25</i></li> </ul>
<b>Cost per Interim Certification</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>\$6,328.75</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>\$6,328.75</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>\$6,328.75</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>\$18,986.25</b></p> <ul style="list-style-type: none"> <li>• <b>Baseline Time to calculate interim certification: 415 hours</b></li> <li>• <i>Times average staff wage: \$15.25</i></li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>\$2,973.75</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>\$2,973.75</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>\$2,973.75</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>\$8,921.25</b> Savings is equal to: <b>\$10,065.00</b></p> <ul style="list-style-type: none"> <li>• <b>Benchmark Time to calculate interim recertification: 195 hours</b></li> <li>• <i>Times average staff wage: \$15.25</i></li> </ul>

**CE #1: Agency Cost Savings**

Unit of Measurement	Baseline	Benchmark
<p><b>Cost of Rent Calculation</b></p>	<p><u>YEAR 1:</u> Baseline is equal to: <b>\$5,032.50</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>\$5,032.50</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>\$5,032.50</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>\$15,097.50</b></p> <ul style="list-style-type: none"> <li>• <b>Baseline Time to calculate rent: 330 hours</b></li> </ul> <p><i>Times average staff wage: \$15.25</i></p>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>\$1,982.50</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>\$1,982.50</b> Savings is equal to: <b>\$13,115</b></p> <ul style="list-style-type: none"> <li>• <b>Baseline Time to calculate rent: 130 hours</b></li> </ul> <p><i>Times average staff wage: \$15.25</i></p>
<p><b>Cost to Determine Income from Assets</b></p>	<p><u>YEAR 1:</u> Baseline is equal to: <b>\$19.29</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>\$19.29</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>\$19.29</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>\$57.87</b></p> <ul style="list-style-type: none"> <li>• <b>Baseline Time to determine Income from Assets: 1.27 hours</b></li> </ul> <p><i>Times average staff wage: \$15.25</i></p>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>\$2.52</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>\$0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>\$2.52</b> Savings is equal to: <b>\$55.36</b></p> <ul style="list-style-type: none"> <li>• <b>Benchmark Time to determine Income from Assets: 0.17 hours</b></li> </ul> <p><i>Times average staff wage: \$15.25</i></p>

<b>CE #1: Agency Cost Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
<b>Cost to Determine utility allowance</b>	<u>YEAR 1:</u> Baseline is equal to: <b>\$2,952.50</b>	<u>YEAR 1:</u> Benchmark is equal to: <b>\$1,372.50</b>
	<u>YEAR 2:</u> Baseline is equal to: <b>\$2,952.50</b>	<u>YEAR 2:</u> Benchmark is equal to: <b>\$0</b>
	<u>YEAR 3:</u> Baseline is equal to: <b>\$2,952.50</b>	<u>YEAR 3:</u> Benchmark is equal to: <b>\$0</b>
	<u>OVERALL:</u> Baseline is equal to: <b>\$7,777.50</b>	<u>OVERALL:</u> Benchmark is equal to: <b>\$1,372.50</b> Savings is equal to: <b>\$6,405</b>
	<ul style="list-style-type: none"> <li>• <b>Baseline Time to determine Utility Allowance: 170 hours</b></li> </ul> <i>Times average staff wage: \$15.25</i>	<ul style="list-style-type: none"> <li>• <b>Benchmark Time to determine Utility Allowance: 90 hours</b></li> </ul> <i>Times average staff wage: \$15.25</i>

<b>CE #2: Staff Time Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).
<b>Time to Complete Annual Certification</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>830 hours</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>830</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>830</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>2,490 hours</b></p> <ul style="list-style-type: none"> <li><b>Time to Complete Annual Certification (not including 0.66 hours of preparation): 0.83 hours</b> <i>times the number of study participants: 1000</i></li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>390 hours</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>390 hours</b> Savings is equal to: <b>2,100 hours</b></p> <ul style="list-style-type: none"> <li><b>Time to Complete Annual Certification (not including 0.66 hours of preparation): 0.39 hours</b> <i>times the number of study participants: 1000</i></li> </ul>
<b>Time To Determine Tenant Rent</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>330</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>330</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>330</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>990</b></p> <ul style="list-style-type: none"> <li><b>Time to Determine Tenant Rent: 0.33 hours</b></li> <li><i>times the number of study participants: 1000</i></li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>130</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>130</b> Savings is equal to: <b>860</b></p> <ul style="list-style-type: none"> <li><b>Time to Determine Tenant Rent: 0.13 hours</b> <i>times the number of study participants: 1000</i></li> </ul>

<b>CE #2: Staff Time Savings</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
<b>Time to Determine Utility Allowance</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>170 hours</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>170</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>170</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>510</b></p> <ul style="list-style-type: none"> <li>• <b>Time to Determine Utility Allowance: 0.17 hours</b></li> <li>• <i>times</i> the number of study participants: <b>1000</b></li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>90 hours</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>90</b> Savings is equal to: <b>420</b></p> <ul style="list-style-type: none"> <li>• <b>Time to Determine Utility Allowance: 0.09 hours</b></li> <li>• <i>times</i> the number of study participants: <b>1000</b></li> </ul>
<b>Time to Determine Income from Assets</b>	<p><u>YEAR 1:</u> Baseline is equal to: <b>1.27 hours</b></p> <p><u>YEAR 2:</u> Baseline is equal to: <b>1.27</b></p> <p><u>YEAR 3:</u> Baseline is equal to: <b>1.27</b></p> <p><u>OVERALL:</u> Baseline is equal to: <b>3.8 hours</b></p> <ul style="list-style-type: none"> <li>• <b>Time to Determine Income from Assets: 0.33 hours</b></li> <li>• <i>times</i> the number of study participants: <b>1000</b></li> <li>• <i>times</i> the estimated proportion of affected participants: 0.0038 (0.38%)</li> </ul>	<p><u>YEAR 1:</u> Benchmark is equal to: <b>0.17 hours</b></p> <p><u>YEAR 2:</u> Benchmark is equal to: <b>0</b></p> <p><u>YEAR 3:</u> Benchmark is equal to: <b>0</b></p> <p><u>OVERALL:</u> Benchmark is equal to: <b>0.17 hours</b> Savings is equal to: <b>3.63 hours</b></p> <ul style="list-style-type: none"> <li>• <b>Time to Determine Income from Assets: 0.33 hours</b></li> <li>• <i>times</i> the number of study participants: <b>1000</b></li> <li>• <i>times</i> the estimated proportion of affected participants: 0.0005 (0.05%)</li> </ul>

<b>CE #3: Decrease in Error Rate of Task Execution</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).
<b>Average Error Rate in Determining TTP</b>	Baseline is equal to: <b>Error rate: 18%</b>	Benchmark is equal to: <b>Error rate: 15%</b>
<b>Average Error Rate in Determining Utility Allowance</b>	Baseline is equal to: <ul style="list-style-type: none"> <li>Error rate In Determining the Utility Allowance is <b>2%</b></li> </ul>	Benchmark is equal to: <ul style="list-style-type: none"> <li>Maintain 2% Error Rate in Determining Utility Allowance</li> </ul>

<b>SS #1: Increase in Household Income</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).
<b>Average Earned Income of Study Group</b>	Baseline is equal to: The Average Earned Income of Study Group: <b>TBD after random assignment</b>	Benchmark is equal to: The Average Earned Income of Study Group at first triennial recertification : <b>TBD after random assignment</b>

**SS #3: Increase in Positive Outcomes in Employment Status**

Unit of Measurement	Baseline	Benchmark
Report the following information separately for each category: (1) Employed Full- Time (2) Employed Part- Time	Head(s) of households in in the categories identified below prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in in the categories identified below after implementation of the activity (number).
(3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Percentage of total work-able households in the categories identified below prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in the categories identified below after implementation of the activity (percent).
<b>Study Group Employment Status</b>  (1) Employed Full-Time: (2) Employed Part-Time: (3) Enrolled in an Educational Program: (4) Enrolled in Job Training Program: (5) Unemployed: (6) Other:	Baseline is equal to the percentage of the Study Group:  (1) Employed FT: <b>TBD after random assignment</b> (2) Employed PT: <b>TBD after random assignment</b> (3) Enrolled in an Educational Program: <b>TBD after random assignment</b> (4) Enrolled in Job Training Program: <b>TBD after random assignment</b> (5) Unemployed: <b>TBD after random assignment</b> Other: <b>NA</b>	Benchmark is equal to the percentage of the Study Group:  (1) Employed FT: <b>TBD after random assignment</b> (2) Employed PT: <b>TBD after random assignment</b> (3) Enrolled in an Educational Program: <b>TBD after random assignment</b> (4) Enrolled in Job Training Program: <b>TBD after random assignment</b> (5) Unemployed: <b>TBD after random assignment</b> Other: <b>NA</b>

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).
<b>Study Group Households Receiving TANF Benefits</b>	Baseline is equal to: <b>TBD after random assignment</b>	Benchmark is equal to: <b>TBD after random assignment</b>

<b>SS #5: Households Assisted by Services that Increase Self-sufficiency</b>		
<b>Self-sufficiency: A household in good standing transitions to self-sufficiency when their housing subsidy is reduced to \$0.</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).
<b>Study Group Households Receiving Self-sufficiency Services</b>	Baseline is equal to: <b>TBD after random assignment</b>	Benchmark is equal to: <ul style="list-style-type: none"> <li>• The same number of Households Receiving Self-sufficiency Services</li> </ul> Note: Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #6: Reducing Per Unit Subsidy Costs for Participating Households</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).
<b>Average HCV Subsidy for Study Group</b>	Baseline is equal to: <b>TBD after random assignment</b>	Benchmark is equal to: <b>TBD after random assignment</b>

<b>SS #7: Increase in Agency Rental Revenue</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).
<b>Total HCV Tenant Share for Study Group</b>	Baseline is equal to: <b>TBD after random assignment</b>	Benchmark is equal to: <b>TBD after random assignment</b>

<b>HC #5: Increase in Resident Mobility</b>		
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0  The baseline for this activity is zero because the population selected for the rent reform activities has not been selected at this time.	0  The benchmark for this activity is zero, the same as the baseline, because the rent reform activities are not designed to move families into neighborhoods of opportunity as an intended outcome.

**B. Source of Data**

SAHA will use several sources to obtain the data necessary to evaluate this program.

- 1) Emphasys Elite is SAHA system of record. Information related to household income, assets, household composition, unit information will be collected from this system.
- 2) The E.I.V. system, pay stubs, and, for self-employed individuals, tax returns will be used to verify household income. Work Number, a third party vendor will also be used to verify income information.
- 3) SAHA Human Resources personnel data will be used to determine the average hourly cost per job title.
- 4) SAHA will also use a Time Study to record average time spent on certifications and quality control activities to compare the Study policies to the traditional program rules.
  - a) The time spent on certifications will include tracking on the average amount of time spent on the scheduling, verification of income, verification of assets over \$25,000, calculations of deductions and allowances, calculations of utility allowance, calculations of TTP, and Interviews with households (as applicable).
  - b) The time spent on quality control will include corrective actions.

- 5) SAHA will perform Quality Control comparison of study and non-study to determine reduced error rates using data obtained from Section 8 QC Database.
- 6) Additional systems will be developed for tracking data and hardship requests

### **III. Need/Justification for MTW Flexibility**

Cite the authorization(s) detailed in Attachment C or D of the Standard MTW Agreement that gives SAHA the flexibility to conduct the activity: SAHA Amended and Restated Moving To Work Agreement dated June 25, 2009, Attachment C, provides the authority to conduct rent reform activities. Specifically, Section D Authorizations for HCV only provides the following:

#### **A. Operational Policies and Procedures**

Item D. 1 (c) provides SAHA flexibility to define Operational Policies and Procedures. SAHA may define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act. This provision waives certain provisions of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516.

This flexibility is necessary to establish a triennial certification and revised interim certification schedule as part of the rent reform activity. Local forms will be created in order to adapt the 9886 to reflect a 36-month term between certifications.

#### **B. Rent Policies**

Item D. 2 (a) Rent Policies and Term limits. SAHA is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program...waives Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H) – (I) of the 1937 Act and 24 C.F.R. 982.508; 982.503 and 982.518.

This authorization is necessary for the provision to set minimum rent, elimination of deductions and allowances, using a percent of gross income to calculate TTP, setting the maximum initial rent burden to 40% of gross income and a simplified utility schedule as components of the rent reform activity.

#### **C. Eligibility of Participants**

Item D. 3 (b) Eligibility of Participants. SAHA is authorized to adopt and implement any reasonable policy for verifying household income and composition and for determining resident eligibility that differ from the current mandated program requirements. This provision waives provisions 24 CRR 982.516 and 982 Subpart E.

This authorization is necessary for the provisions to simplify rent calculation by eliminating income from household assets valued less than \$25,000; eliminating deductions and allowances and to use household gross income to set the TTP.

#### **IV. Impact Analysis**

##### **A. Description of HCV Rent Reform Activity**

A description of the HCV rent reform activity was provided in **Section I - Description of Rent Reform Components**.

##### **B. Tracking and Documenting the Implementation**

Information on tracking and documenting the implementation of the HCV rent reform activity is found in **Section II - Activity Metrics**. Additionally, MDRC will obtain information throughout the lifespan of this study for use in a comprehensive assessment of the effectiveness of the rent reform activity. On an annual basis, SAHA will report the results on the implementation in the annual report. MDRC will issue an interim report on the implementation. At the conclusion of the report, HUD and/or MDRC will report the outcomes of the Study in a comprehensive report.

##### **C. Measuring the Impacts**

Information on tracking and documenting the implementation of the HCV rent reform activity is found in Section II - Activity Metrics and Section VI - Annual Reevaluation of Rent Reform Activity.

Additionally, at the conclusion of the study MDRC will report the outcomes of the Study in a comprehensive report.

##### **D. Identifying the Intended and Possible Unintended Impacts**

Due to the nature of the project, the financial impacts are addressed comprehensively to reflect the totality of HCV rent reform activity.

###### **1) Impact on HAP Expenditures under Current and Alternative Rent Policies**

Models developed by MDRC estimate the impact on Housing Assistance Payments (HAP) expenditures over 4 years, with and without a modest employment impact, for SAHA.

###### *a) Understanding the Table's Format*

Table 1 presents the results of this HAP analysis for SAHA. The table shows:

- Estimated HAP payments for each year during the three-year recertification period and then in Year 4.
- The dollar amount difference and the percent difference in comparing the current rent policy with the new rent policy.

The data in the table includes the following information:

- “Year 1” represents when the new rent policy would begin with an initial income assessment
- “Year 4” represents the year after the next triennial recertification.
- For Year 4 and the cumulative years 1-4, two estimates are included:
  - one that assumes that the rent policy has no impact on tenant earnings, and
  - a second that assumes that the policy has a modest impact on tenant earnings.

These estimates are based on a sample of all working-age/ non-disabled SAHA voucher holders that were not already receiving a child care deduction in year 1, but the number of households have been prorated in order to illustrate a representative subsample of those likely to be in the study.

#### *b) Background on Change*

The alternative rent policy is intended to be roughly *cost-neutral* from the perspective of housing agencies and HUD. This means that the combination of HAP and administrative expenditures should remain about the same as the total expenditures for assisting the same number of voucher holders under the traditional rent policy. Ideally, those expenditures would fall, creating an opportunity to provide housing assistance to more families for the same amount of money.

#### *c) Interpreting the Potential Impacts*

**Potential Impact 1:** The results show that estimated HAP expenditures are lower under the new policy relative to the current policy in Year 1 (0.4%), but they are somewhat higher under the new policy during Years 2 and 3 (by 2.7 percent and 6.9 percent, respectively).

This impact is largely because voucher holders who would increase their earnings under the current policy and normally have their housing subsidies reduced would not have their subsidies reduced during this period under the alternative policy’s TTP freeze.

**Potential Impact 2:** However, in Year 4, even assuming that the alternative rent policy did *not* have an impact on tenants' employment and earnings, estimated HAP expenditures under the new rent policy are slightly lower than under the current policy.

This reflects the fact that, on average, TTPs recalculated in Year 4 would be based on higher average earnings, because of normal increases in work and earnings over time (i.e., increases that would have occurred even in the absence of the new policy). It is at the point of the triennial recertification that housing agencies begin to recoup the foregone HAP reductions in the prior years when TTPs were held constant.

**Potential Impact 3:** HAP expenditures will fall even more in Year 4 (by \$493,055) if the new policy *does* have a modest positive impact on household earnings. This impact would push up the income base for setting new TTPs to a higher level than what it would reach under current rules. A higher income base means that households will pay a larger share of their rent and utilities, thus requiring a lower subsidy.

**Potential Impact 4:** The *cumulative* HAP expenditures for Years 1-4 show that in the absence of an employment impact, those expenditures may be higher under the new rent policy compared with the current policy by 2 percent. However, if the alternative policy has a modest employment impact of the assumed size, SAHA is projected to incur a marginal cumulative increase in HAP expenditures – a fraction of 1 percent, which, given the imprecision of the modeling, might be considered roughly a “break-even” result.

**Table 1**

**Estimates of HAP Expenditures Under Alternative and Current Rent Policies for Working-Age/Non-Disabled Households (\$)**

				(Assuming no employment impact)	(Assuming modest employment impact)	(Assuming no employment impact)	(Assuming modest employment impact)
	Year 1	Year 2	Year 3	Year 4	Year 4	Total, Years 1-4	Total, Years 1-4
New rent policy	6,461,043	7,558,883	7,704,035	7,616,210	7,209,913	29,340,171	28,933,873
Current rent policy	6,489,413	7,360,910	7,208,336	7,702,968	7,702,968	28,761,627	28,761,627
Difference	(\$28,370)	+\$197,973	+\$495,699	(\$86,757)	(\$493,055)	+\$578,544	+\$172,247
Percent change	(0.4%)	+2.7%	+6.9%	(1.1%)	(6.4%)	+2.0%	+0.6%

2) Existing deductions and allowances

Table 2 presents the existing number of households in San Antonio receiving deductions and allowances, the percentage of households receiving specific deductions and allowances, and the average dollar amount of those deductions and allowances per household. Note that this table shows existing conditions rather than the potential impact.

a) *Background on Change*

Under the new policy, deductions and allowances are no longer permitted, making gross income the base for determining a household’s TTP. Relying on gross income in calculating tenants’ eligibility and TTP will simplify the rent-setting process and make it more transparent for both housing agencies and tenants. Child care allowances, in particular, can be burdensome to administer accurately. Under the traditional rent rules, child care allowances are based on *anticipated* unreimbursed child care expenses for the next year (or until the next recertification). Actual costs can be difficult to anticipate, however, particularly for parents who move in and out of jobs, whose child care providers change, whose child care needs change (e.g., if their work shifts change, whose children make a transition to a free pre-school program, or who become eligible for an external

child care subsidy during the course of the year. It is not clear how reliably these types of changes are reported to housing agencies between recertification meetings, some of which might result in TTP increases, or decreases. It would be considerably more difficult to estimate *anticipated* child care expenditures under the new rent policy for the entire three-year period until the next triennial recertification. This would likely raise expectations for housing agencies, as stewards of public monies, to monitor whether actual child care expenditures during that much longer time period actually conformed to the levels anticipated, and to revise tenants' TTPs when they did not. Building a new compliance system to monitor child care expenditures would work against the larger rent reform goal of reducing administrative burdens, and it would create more reporting requirements for tenants.

*b) Interpreting the Potential Impacts*

**Potential Impact 1:** Currently 89.2 percent of households in SAHA receive at least one deduction. Eliminating deductions may affect the housing subsidies of some households more than others. For example, those with large families and high deductions for child care costs will find that, at their current income levels, their subsidies are reduced. It should also be noted, however, that only a small percentage of households currently make use of the existing child care allowance – 9.8 percent of working-age/non-disabled households in SAHA. In part, these low rates reflect the fact that many tenants who might benefit from the deductions are not employed. The average annual amount of that deduction among those who use is about \$3,334 in SAHA. For the purposes of the Rent Reform Demonstration, all households with a *current* child care deduction will be excluded from the research sample and can continue to receive any qualifying child care deduction.

The new rent policy offers some compensation for this loss of child care allowances, first by reducing the percent of income in calculating TTP to 28 percent, and second by not raising the TTPs of households that increase their incomes during the extended recertification period until the next triennial recertification. This will leave families that increase their earnings with more resources to cover child care costs.

**Table 2**  
**Deductions And Allowances**  
**Among Current Working-Age/ Non-Disabled Voucher Holders**

Total number of households	6,926
<b>Income Allowances &amp; Deductions</b>	
Any deductions (%)	89.2
Type of deduction (%)	
Medical/disability	0.3
Elderly/Disability	1.4
Dependent care	88.9
Childcare	9.8
Average annual deduction amount among those receiving deduction (\$)	
Medical/disability	681
Elderly/Disability	400
Dependent care	1,296
Childcare	3,334
Total average deduction amount among those receiving a deduction (\$)	1,668
<b>Utility Allowance</b>	
Has utility allowance (%)	88.6
Total monthly average utility allowance if receiving an allowance (\$)	155
<b>Utility Allowance Reimbursement</b>	
Receiving utility allowance reimbursement (%)	0.3
Average amount of utility allowance reimbursement (\$)	71

3) Impact on Family Share for households with selected characteristics

Models developed by MDRC estimate the percentage of households that will likely pay a higher “family share” of shelter costs under the alternative rent policy. Assuming no employment impact, the estimated percentages of households with selected

characteristics likely to pay a higher family share in year 4 in SAHA is shown below in table 3.

a) *Background on Change*

The alternative rent policy is likely to *reduce* the family share for some households and *increase* it for others. Table 3 shows that certain types of families may be more likely than other families to have a higher family share.

b) *Understanding the Table's Format*

Table 3 indicates:

- How prevalent certain types of households are among the total number households (1000), and
- How prevalent those same types of households are among all the voucher holders who would likely experience an increase in family share under the new policy (660).

These estimates are based on a sample of all working-age/ non-disabled SAHA voucher holders that were not already receiving a child care deduction in year 1, but the number of households have been prorated in order to illustrate a representative subsample of those likely to be in the study.

c) *Interpreting the Potential Impacts*

**Potential Impact1:** Overall, larger families would be more likely to be affected by the new rent policy, at least in terms of the likeliness of paying a higher family share of shelter costs.

For example:

- The first column shows that households with three or more children represent 39.4 percent of all working-age/ non-disabled households in SAHA (or 394 households out of 1000, as indicated in the second column).
- Of all voucher holders who are likely to pay a higher family share (660 households), households with three or more children represent a larger proportion (50.9 percent, as shown in the third column, or 336 households, as shown in the fourth column).

**Potential Impact 2:** Over half of the households that are likely to have an increase in family share are households that have no earned income.

- About 501 households (or 50.1 percent out of a sample of 1000 households) have no earned income.

- Of the 660 households that are likely to have an increase in family share, 408, or 61.8 percent, of those, are households without earned income.

However, it is important to remember shelter costs represent only part of the picture of households' economic circumstances, and that overall *net income* might improve even for larger families if they increase their earnings over the course of the prior three years.

**Table 3**

**Representativeness of Households with Selected Characteristics Among Working-Age/ Non-Disabled Households Likely to Pay a Higher Family Share in Year 4**

**Under Alternative vs. Current Rent Policies (Assuming No Employment Impact)**

<b>Characteristic (%)</b>	<b>(%) Percent of Households</b>	<b>(#) Number of Households</b>	<b>(%) Percent with Higher Family Share under New Policy</b>	<b>(#) Number with Higher Family Share under New Policy</b>
Number of Children				
No Children	16.5	165	8.4	56
Any number of Children	83.5	835	91.6	604
1 Child	19.3	193	14.5	96
2 Children	24.8	248	26.2	173
3 or more Children	39.4	394	50.9	336
Has child under age 5	35.6	356	42.7	282
No earned income	50.1	501	61.8	408
No income	0.9	9	1.3	9
<b>Sample size</b>	1000	1000	660	660

4) Impact on Family Share for households, by Dollar Amount

Models developed by MDRC estimate the changes in monthly family share over 4 years, with and without a modest employment impact. Shown below are these estimates for San Antonio.

*a) Understanding the Table's Format*

Table 4 presents the results of the impact on Family Share for SAHA. The table shows:

- The difference in family share under the new policy compared with current policy using three main categories (Lower under new policy, No change, Higher under new policy)
- The estimated percent (%) of all households impacted under each main category and the estimated percent of all households impacted based on the dollar amount of the impact.
- Estimated number (#) of households impacted for each of the three main categories

The data in the table includes the following information:

- “Year 1” represents when the new rent policy would begin with an initial income assessment
- “Year 4” represents the year after the next triennial recertification.
- For Year 4 and the cumulative years 1-4, two estimates are included:
  - one that assumes that the rent policy has no impact on tenant earnings, and
  - a second that assumes that the policy has a modest impact on tenant earnings.

These estimates are based on a sample of all working-age/ non-disabled SAHA voucher holders that were not already receiving a child care deduction in year 1, but the number of households have been prorated in order to illustrate a representative subsample of those likely to be in the study.

*b) Interpreting the Potential Impacts*

**Potential Impact 1:** Although the alternative rent policy will *reduce* the family share for some households, it will *increase* it for others. During the three-year period when the new policy's delayed recertification period is in effect, up to 52.4 percent of households (*depending on the year*) may have a *lower* family share than they would otherwise have under current rules, up to 66.9 percent of households (*depending on the year*) may have a *higher* family share.

**Potential Impact 2:** In Year 4, given no employment impact and without considering any *hardship-related reductions* in TTP (which were difficult to build into the statistical models), it appears that more than half of the cases where households would pay a

higher family share under the new rules, they would only pay up to \$50 per month more. Less than 1 percent (0.2%) would pay more than \$200 more than they would pay under the current rules. The higher family share under the new policy would come from the policy's minimum rent, the absence of deductions, and limits on interim recertifications in the face of income declines. *However, as noted, this analysis does not apply any hardship remedies, so the increases in TTP are likely to be overstated to some extent.*

**Potential Impact 3:** If the new policy has a modest positive effect on earnings, more tenants than under current rules will experience an increase in their family share for Year 4, after their three-year income recertification. If the new policy has a modest employment impact, the analysis suggests that family share may increase by \$50 or less per month for 32.5 percent of households, and by \$125.01 - \$150 per month for 14.4 percent of households. Very few households (0.4 percent) are likely to incur an increase of more than \$200 per month.

**Table 4**

**Change in Monthly Family Share (FS) Under Alternative vs. Current Rent Policies  
for Working-Age/Non-Disabled Households**

Difference in FS under new vs. Current policy	Year 1	Year 2	Year 3	(no employment impact)	(modest employment impact)
				Year 4	Year 4
<b>Lower under new policy (#)</b>	331	441	524	318	274
<b>Lower under new policy (%)</b>	33.1	44.1	52.4	31.8	27.4
\$10 or less	9.0	6.4	5.9	10.1	7.2
\$10.01 - \$20.00	6.2	5.5	4.9	7.4	6.8
\$20.01 - \$30.00	3.9	4.3	4.2	4.5	4.2
\$30.01 - \$40.00	2.6	2.9	2.9	1.9	1.7
\$40.01 - \$50.00	1.9	2.6	2.5	1.0	0.9
\$50 or less	23.6	21.7	20.5	24.9	20.7
\$50.01 - \$75.00	2.8	5.4	5.8	1.4	1.3
\$75.01 - \$100.00	1.8	3.9	4.8	0.9	0.8
\$100.01 - \$125.00	1.3	3.0	3.8	0.8	0.8
\$125.01 - \$150.00	1.2	2.3	3.1	0.6	0.6
\$150.01 - \$175.00	0.6	1.7	2.5	0.8	0.7
\$175.01 - \$200.00	0.6	1.7	2.0	0.4	0.3
More than \$200	1.3	4.5	10.1	2.1	2.1
<b>No Change (#)</b>	0	0	1	3	3
<b>No Change (%)</b>	0.0	0.0	0.1	0.3	0.3
<b>Higher under new policy (#)</b>	669	558	475	678	723

<b>Higher under new policy (%)</b>	66.9	55.8	47.5	67.8	72.3
\$10 or less	11.0	7.1	6.7	10.5	7.3
\$10.01 - \$20.00	11.9	8.1	6.7	11.4	6.5
\$20.01 - \$30.00	10.1	8.2	6.3	9.8	4.9
\$30.01 - \$40.00	10.6	7.7	6.4	7.8	4.1
\$40.01 - \$50.00	18.5	15.9	14.3	21.9	9.7
\$50 or less	62.1	47.0	40.3	61.4	32.5
\$50.01 - \$75.00	4.1	5.7	4.4	3.5	4.7
\$75.01 - \$100.00	0.3	1.8	1.4	1.4	5.6
\$100.01 - \$125.00	0.1	0.8	0.7	0.6	8.7
\$125.01 - \$150.00	0.1	0.1	0.3	0.5	14.4
\$150.01 - \$175.00	0.1	0.1	0.1	0.1	5.1
\$175.01 - \$200.00	0.0	0.1	0.1	0.2	0.8
More than \$200	0.1	0.2	0.2	0.2	0.4
<b>Sample Size</b>	1000	1000	1000	1000	1000

### 5) Impact on Net income

The MDRC team completed a net income analysis for two different types of households which vary importantly in terms of their potential need for child care subsidies:

- **Tables 5a, 5b, and 5c are examples of “Shana’s” household**, where Shana is a single parent with two teenage children and no child care expenses.
- **Tables 6a and 6b are examples of “Maria’s” household**, where Maria is a single parent with an infant who may need child care to work.

#### a) *Background on Assumptions*

For each household, the analysis estimated net monthly income under current rent rules and net income under new rent rules, making different assumptions about how much the

parent worked (zero, 15, or 35 hours per week) and her hourly wage (\$8 or, in some cases, \$16).

Figure 5a, Table 5b, and Table 6a illustrate net income for Shana and Maria under the new and current rent policies when *there is a change in employment status*.

Table 5c and Table 6b illustrate net income for Shana and Maria under the new and current rent policies when *their employment status remains unchanged*.

#### *b) Interpreting the Potential Impacts*

**Potential Impact 1:** The analysis of the net income effects illustrates that when a household *changes its work status and earnings* – e.g., when tenants who are not working go to work, or those who are working part-time get full-time jobs, or when working tenants attain wage increases – net household income will improve more under the new rent policy than under current rent rules. This is achieved primarily by holding TTP constant in the face of earnings gains during the three-year period before the next triennial recertification.

Figure 5a helps to illustrate how the new policy benefits tenants to who do change their work status. The figure shows how “Shana’s” net monthly income would change under current rent rules as her work status changes. For example, if she had not been working early in the three-year period (Time 1) and paying San Antonio’s existing \$50 minimum TTP, her net income would be \$620. Under the new rent rules it would drop to \$602 (under a hardship waiver of the minimum rent). If she were then (at Time 2) to go to work part-time (15 hours per week) at a low wage rate (\$8 per hour, which is just above the Federal minimum wage), her net monthly income would increase to \$957 under current rent rules, but to \$989 under the new rules. If she were to work full-time (35 hours per week), her net income would grow to \$1,514 under current rules, but to \$1,754 under the new rent rules. Thus, Shana would benefit substantially from the new policy if she were initially not working and took a full-time job, even at a low wage. It would increase her net income by 191 percent under the new policy, compared with 144 percent under current rules.

The advantage under the new rules is created by holding her TTP constant. As the second two bars in each set in Figure 5a show, Shana’s TTP would rise from \$50 to \$340 under current rules as she progressed to full-time work, whereas they would remain at \$100 under the new rules (once the hardship exemption expired). In effect, the implicit marginal “tax” on any increased earnings due to the normal income-based housing subsidy rules would drop to zero under the new rules during this period.

Table 5b provides further detail on these changes. It shows, for example, that in moving from non-work to full-time work, Shana would have 16 percent more (or \$240 more) in net income per month (once she is working) than if she made the same move under current rent rules. This translates into an extra \$2,880 per year. Table 5b also shows what would happen after the next triennial recertification. At that time under the new rent policy, Shana's TTP would be reset to a higher rate, and, as a result, her monthly net income would drop relative to what it had been in the prior period. It would become comparable to what it would be under current rent rules. However, because her TTP would be held constant for another three years, her net income would grow *more* under the new rent rules relative to current rules if she could increase her wage rate. For example, if she could double her wage rate to \$16 per hour job, her net income would grow by 44 percent under the new rent rules compared with only 20 percent under existing rules. Put differently, that wage increase would mean that her net monthly income would be \$364 higher (or 20% higher) under the new rent policy than it would be under current rules (or \$4,368 higher per year). The improvement would be less under existing rules because her TTP would jump from \$340 to \$704 per month.

**Potential Impact 2:** The advantages of the new rules will be smaller for tenants who, in order to go to work or to work more, need external child care subsidies but cannot get them. The absence of child care allowances under the new rules will offset some of the benefit of holding TTP constant in the face of earnings gains for some families unless other child care arrangements can be found. Of course, many families who need but cannot get external child care subsidies have difficulty working even under current rent rules because the existing child care allowances are only an income deduction and do not fully cover child care costs. Thus, some families may not work under either rent policy because, if they have to pay for child care out of pocket, it may not “pay” to work.

Table 6a provides estimates of how net income would change for “Maria” as she changed her work status under the new and existing rent rules. However, in Maria's case, it is important to take into consideration her likelihood of receiving child care subsidies from an external funding source. The analysis shows that if Maria, who has a young child, does not need to pay for child care (e.g., because she is able to arrange for family or friends to care for her child at no cost), the new rent rules would provide a clear advantage for going to work full-time, as they do for Shana.

The new rules would also make it more advantageous, compared with current rules, for Maria to move from not working to working full-time, even if she needed to pay for child care out of her own pocket without any subsidies. However, this advantage would be less than it would be if Maria had no child care costs.

After the triennial recertification, parents without a child care subsidy who are working (and paying for child care out of pocket) may fair less well under the new rent rules compared with the existing rent rules once their TTPs are adjusted to reflect their increased earnings. For example, as Table 6a shows, Maria would have a lower net monthly income under the new rules after the triennial recertification *if she needed but receives no external child care subsidy*. However, under these circumstances, Maria might very well choose not to work, *even under the current rent rules*, if she had to pay for most of her child care out of pocket.

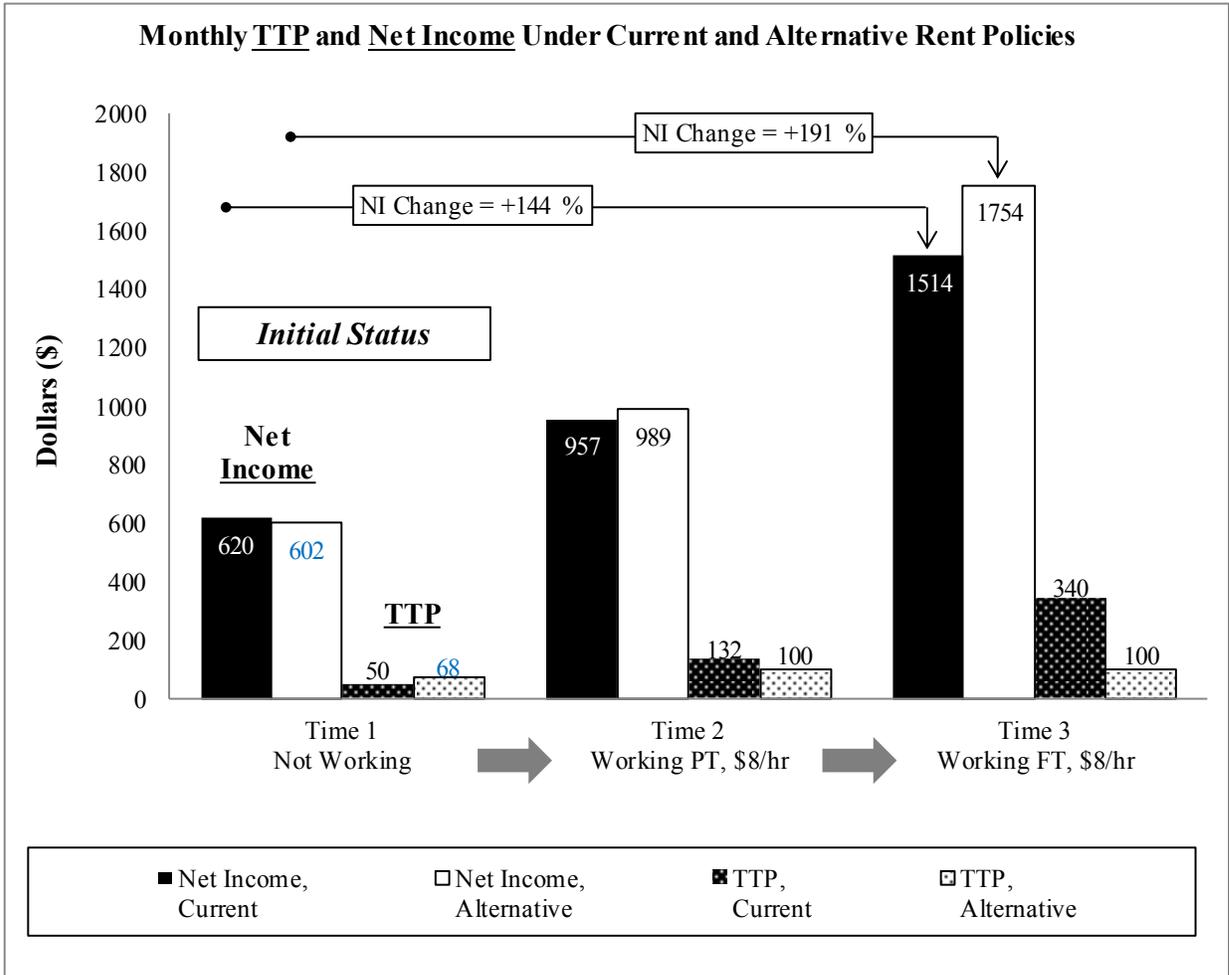
At the same time, after that next recertification, Maria would benefit more under the new rent rules if she increased her earnings during the new three-year period (because of the new cap on her TTP). The advantage over current rules would be even larger once her child required less paid child care after entering preschool or elementary school.

**Potential Impact 3:** Tenants who do not work at all may pay a somewhat higher TTP and have somewhat lower net income under the new rules if they become subject to the minimum rent and do not qualify for a hardship remedy. In addition, working tenants who do not increase their hours of work or wage levels (e.g., they remain working part-time or full-time at a constant wage) will experience little, if any, gain – or loss – in net income under the new rules relative to current rules. This is because their TTPs will remain constant over time, even under current rules. Tables 5c and 6b illustrate this pattern by comparing net income for Shana and Maria under the new and current rent policies when their employment status *remains unchanged*. These tables indicate that, at least in these hypothetical examples, the largest reduction in net income when work status does not change is about \$18 per month.

c) Exhibits illustrating the impact on "Shana's" household

Figure 5a

**Changes in Estimated Household Monthly TTP and Monthly Net Income (NI) As "Shana" Increases Her Work Effort, Under Alternative and Current Rent Policies During the First 3-Year Period**



NOTE: According to the hardship policy under the new rules in San Antonio, net income for the "not working" status has been adjusted to reflect a waiver of the minimum rent because the minimum rent resulted in a TTP that was more than 40 percent of current/ anticipated income.

**Table 5b**

**Changes In Estimated Household Monthly Net Income As "Shana" Increases Her Work Effort, Under Alternative and Current Rent Policies**

<b>Shana</b> is a single mother with 2 children (Ages 13 and 15)	Year 1 through Year 3				3-Year Recertification Interview: New TTP Set	Year 4 through Year 6			
	Not Working	Working Fulltime at \$8/hour	Difference	Percent Change		Working FT at \$8/hour	Working Fulltime at \$16/hour	Difference	Percent Change
<b>Initial Status</b>					<b>Initial Status</b>				
<b>TTP</b>									
New Rules	\$68	\$100	\$32	+47%	\$340	\$340	\$0	0%	
Current rules	\$50	\$340	+\$290	+580%	\$340	\$704	+\$364	+107%	
Difference (New minus Current) (%)	+36%	(71%)			0%	(52%)			
<b>Net Income</b>									
New Rules	\$602	\$1,754	+\$1,152	+191%	\$1,514	\$2,183	+\$669	+44%	
Current rules	\$620	\$1,514	+\$894	+144%	\$1,514	\$1,819	+\$305	+20%	
Difference (New minus Current) (%)	(3%)	+16%			0%	+20%			

NOTE: According to the hardship policy under the new rules in San Antonio, net income for the "not working" status has been adjusted to reflect a waiver of the minimum rent because the minimum rent resulted in a TTP that was more than 40 percent of current/ anticipated income.

**Table 5c**

**Estimated Net Household Monthly Net Income for "Shana," Assuming No Change in Work Status, Under Alternative and Current Rent Policies, by Work Status**

<b>Shana</b> is a single mother with 2 children (Ages 13 and 15)	Not Working	Working PT at \$8/hour	Working FT at \$8/hour
New Rules	\$602	\$943	\$1,514

Current Rules	\$620	\$957	\$1,514
Difference			
New minus Current	(\$18)	(\$14)	\$0

NOTE: According to the hardship policy under the new rules in San Antonio, net income for the "not working" status has been adjusted to reflect a waiver of the minimum rent because the minimum rent resulted in a TTP that was more than 40 percent of current/ anticipated income.

d) Exhibits illustrating the impact on "Maria's" household

Table 6a

**Changes in Estimated Household Monthly Net Income As "Maria" Increases Her Work Effort, Under Alternative and Current Rent Policies, by Receipt of External Child Care Subsidy**

Maria is a single mother with a 1-year old child	Year 1 through Year 3				3-Year Recertification Interview: New TTP Set	Year 4 through Year 6			
	Not Working	Working FT at \$8/hour	Difference	Percent Change		Working FT at \$8/hour	Working FT at \$16/hour	Difference	Percent Change
<b>Initial Status</b>									
<b>Does not need child care subsidy</b>									
New Rules	\$496	\$1,458	+\$962	+194%		\$1,218	\$1,945	+\$727	+60%
Current rules	\$504	\$1,207	+\$703	+140%		\$1,207	\$1,569	+\$362	+30%
Difference (New minus Current) (%)	(2%)	+21%				+1%	+24%		
<b>Needs child care subsidy but does not receive it</b>									
New Rules	\$496	\$967	+\$471	+95%		\$727	\$1,479	+\$752	+103%
Current rules	\$504	\$875	+\$372	+74%		\$875	\$1,263	+\$388	+44%
Difference (New minus Current) (%)	(2%)	+11%				(17%)	+17%		

NOTE: According to the hardship policy under the new rules in San Antonio, net income for the "not working" status has been adjusted to reflect a waiver of the minimum rent because the minimum rent resulted in a TTP that was more than 40 percent of current/ anticipated income.

**Table 6b**

**Estimated Household Monthly Net Income for "Maria," Assuming No Change in Work Status, Under Alternative and Current Rent Policies, by Work Status**

<b>Maria</b> is a single mother with a 1-year old child but does not currently have child care costs and does not use a child care deduction	Not Working	Working PT at \$8/hour	Working FT at \$8/hour
<b>New Rules</b>	\$496	\$839	\$1,219
<b>Current Rules</b>	\$504	\$841	\$1,207
<b>Difference</b>			
<b>New minus Current</b>	(\$8)	(\$2)	\$12

NOTE: According to the hardship policy under the new rules in San Antonio, net income for the "not working" status has been adjusted to reflect a waiver of the minimum rent because the minimum rent resulted in a TTP that was more than 40 percent of current/ anticipated income.

**V. Hardship Policy**

SAHA is participating in the Study in order to further the national discussion regarding the future of the Housing Choice Voucher Program. The alternative rent strategies are not intended to create an undue burden on the Study Group members. SAHA has established the following Hardship Policy for Study Group members. Households participating in the Study as part of the Control Group will be subject to the current SAHA policies.

**A. Hardship Waiver Request Process.**

The process for requesting a waiver will be as follows:

- 1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to Housing Assistant Specialist.
- 2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the

following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.

- 3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 90 days.
- 4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 10 day notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 10 day notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

## **B. Hardship Waiver Criteria**

SAHA may determine a financial hardship exists when the household cannot pay the minimum rent or has an excessive rent burden. Households will be considered for a hardship waiver, as discussed below, if:

- 1) The hardship cannot be remedied by the one interim recertification permitted each year (which cannot reduce a household's TTP below the minimum level).
- 2) The household is at an income level or experiences a loss of income and/or a TTP increase such that its total monthly TTP exceeds 40 percent of its current monthly gross income. The gross income will include imputed income in the same manner as current calculations.
- 3) The household faces risk of eviction for non-payment of rent – including utility shut-offs for non-payment of utility bills that could lead to eviction.
- 4) Other circumstances as determined by the housing agency.

## **C. Hardship Review Process**

- 1) The administrative review of the household circumstances will be conducted by SAHA according to current review processes.
- 2) For hardship claims related to imminent risk of eviction, SAHA will conduct an expedited hearing process.
- 3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing agency's normal grievance procedures.

- 4) SAHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

#### **D. Hardship Remedies**

- 1) The Hardship remedies may include any of the following:
  - a) Allowing an additional interim recertification beyond the normal one-per-year option. This could lower household's TTP (but only as low as the \$100 minimum TTP) until the next triennial recertification.
  - b) Setting the household's TTP at the minimum level for up to 90 days.
  - c) Setting the household's TTP at 28 percent of current income, for up to 180 days.
  - d) Offering a "transfer voucher" to support a move to a more affordable unit (including a unit with lower utility expenses).
  - e) A specific time frame for the temporary TTP or minimum rent may be established for longer than 180 days based on specific circumstances. However, the time frame will never go past the triennial recertification date.
  - f) Any combination of the above remedies.
- 2) During the period when the TTP is reduced, the housing agency will increase its payment to the landlord to cover the portion of the rent previously paid by the tenant directly to the landlord, and it will notify the landlord of the change and the time period of the increased payments.
- 3) In addition to the remedy or remedies offered, the household may be referred to federal, state or local assistance programs to apply for assistance, or to obtain verification that they are ineligible to receive benefits.
- 4) The Hardship remedies are subject to the following limitations:
  - a) The tenant portion of the rent payments will not be suspended prior to a hardship designation.
  - b) Remedies will not affect any rent attributable to a gross rent that exceeds the applicable payment standard.
  - c) Opting out of the alternative rent policy is not a remedy option.

#### **E. End of Hardship Waiver Period**

- 1) If the hardship continues, the household may submit a request for an extension of the hardship remedy. However, the time frame will never go past the triennial recertification date.
- 2) At the end of the hardship waiver period, the household's regular TTP will be reinstated.

## **VI. Annual Reevaluation of Rent Reform Activity**

SAHA will review the rent reform activities annually and will report its findings to HUD in the yearly MTW Report. Because certain activities will be conducted on a triennial basis, not all information may be presented each year. However, SAHA will report on the following:

- Hardship requests and determinations
- Interim certifications for loss of income
- Program departures
- HAP Expenditure

## **VII. Transition Period**

### **A. Selection of Participants**

Study Participants will be randomly selected from the eligible vouchers through a computer generated random selection program. Eligible vouchers will specifically exclude the following:

- 1) Vouchers not currently administered under the Moving to Work Program:
  - a) Veterans Affairs Supportive Housing (VASH)
  - b) Moderate Rehabilitation
  - c) Shelter Plus Care
- 2) Enhanced Vouchers
- 3) HUD Project Based Vouchers
- 4) Vouchers administered under portability
- 5) Elderly households: Head of Household, co-head, spouse or single member households 62 years or older pursuant to the Administrative Plan

- 6) Households headed by people older than 56 years of age (who will become seniors during the course of the long-term study).
- 7) Disabled households: Head of Household, co-head, spouse or single member households with disability as defined in the Administrative Plan
- 8) Households currently participating in the Family Self-sufficiency Program
- 9) Households participating in the Homeownership Program
- 10) Households currently using the childcare expense deduction to determine the adjusted annual income.
- 11) Households that contain a mix of eligible and non-eligible household members would not be included in the Study

## **B. Enrollment of Study Group members**

### 1) Prior to Certification Meeting

Selected Study Group members will receive special information with their recertification package to introduce them to the rent reform policies and to answer household questions. SAHA will conduct the triennial certification at the time otherwise scheduled for the household annual certification.

### 2) During Certification Meeting

At the initial triennial certification, the household will have the changes in rent reform policies explained to them. They will be provided with a gift card as a nominal thank you for providing filling out a base information form.

Changes in the household share, TTP, utility schedule allowance will be provided to the household with no less than 30 days' notice.

### 3) Mitigation of impact at initial triennial certification

At the triennial certification at the beginning of the three-year period (and at subsequent triennials), if a household's current/anticipated income is less than its retrospective income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period.

After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.



## **FY2015-2 Elderly Admissions Preference at Select Public Housing Sites**

This activity is designed to meet the statutory objective of increasing housing choices for low-income families.

This activity establishes a 4-to-1 elderly admissions preference at specific communities in order to increase housing choices for elderly households.

The goal of the activity is to address continuing concerns of elderly residents at specific communities regarding lifestyle conflicts between elderly and non-elderly residents. Property Management's ability to address these conflicts is reduced significantly when the ratio of non-elderly to elderly residents rises above a certain proportion. The 4-to-1 admissions preference is proposed in order to create and maintain an optimal mix of elderly and non-elderly residents in each community.

The idea of an optimal mix is based on research of the reaction to a 1995 Massachusetts law that attempted to limit the percentage of non-elderly disabled tenants living in state-funded elderly housing. In 2002, the Massachusetts Office of Legislative Research provided an update on the success of the 1995 law, which had established optimal proportions of 86.5% elderly and 13.5% non-elderly residents. Housing officials reported that the law had been largely successful in:

- 1) reducing the number of problems that arise from these mixed populations sharing the same housing;
- 2) slowing what had been a sharply increasing rate of non-elderly disabled households moving in, and
- 3) reducing the relatively high percentage of non-elderly disabled tenants in certain projects.

Housing advocates, however, suggested that the optimal proportion should be 80% elderly and 20% non-elderly residents. This MTW activity, FY2015-2, adopts that suggested 80/20 ratio ("4-to-1") both for its admissions preference as well as for its ultimate unit mix.

In practical terms, this activity allows the admission of four elderly applicants from the waiting list before admitting a non-elderly applicant, until such time as an optimal mix of elderly and non-elderly disabled residents is reached for the community. No residents will be required to relocate in order to meet these targets. The agency is not establishing a date by which to achieve the 80/20 target, and will rely solely on the normal resident turnover process to gradually transition the population balance.

When a property reaches its target 4-to-1 ratio of elderly to non-elderly residents, SAHA will start to draw applicants using a 1-to-1 ratio of elderly to non-elderly applicants in order to maintain the overall 4-to-1 balance. Should the mix ever tip in the other direction and start to house elderly residents at a higher ratio than 4-to-1, then SAHA will draw non-elderly disabled residents at a higher rate than elderly residents in order to maintain the overall 4-to-1 balance.

This activity impacts only two public housing communities, and only 85 units over 3-5 years. The impact will be gradual, at a rate of around 20 units per year for both properties. The communities at

which this policy will be applied are Fair Avenue and WC White. The following section describes how the activity would work at each community.

### Fair Avenue

The total number of units at Fair Avenue is 216, making 173 the 80% target for elderly households. Currently, Fair Avenue is home to 110 elderly (62 and over) households. So Fair Avenue needs to add 63 elderly households to meet the 80% target. The turnover rate for Fair Avenue last year was 19.9% (3.5 units per month), or 43 units over the course of the year.

If the turnover rate is the same for this plan year, SAHA expects those 43 available units to be offered to 35 elderly households and 8 non-elderly disabled households. Specifically, the first four available units would be offered to elderly households, and the fifth available unit would then be offered to a non-elderly disabled household. The sixth through ninth units would be offered to elderly households, and the tenth to a non-elderly disabled household. That sequence, repeated through the year in 8 full cycles and 1 partial cycle, is represented in the following table, where “E” represents Elderly Household and “NE” represents Non-elderly Disabled Household.

<b>Fair Avenue: Admissions cycle and estimated time frame based on turnover rate of 3.5 units per month</b>	<b>E</b>	<b>E</b>	<b>E</b>	<b>E</b>	<b>NE</b>
<b>1 (Jul – Aug)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>2 (Aug-Sep)</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>
<b>3 (Sep-Oct)</b>	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>
<b>4 (Nov-Dec)</b>	<b>16</b>	<b>17</b>	<b>18</b>	<b>19</b>	<b>20</b>
<b>5 (Dec-Jan)</b>	<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>	<b>25</b>
<b>6 (Jan-Feb)</b>	<b>26</b>	<b>27</b>	<b>28</b>	<b>29</b>	<b>30</b>
<b>7 (Mar-Apr)</b>	<b>31</b>	<b>32</b>	<b>33</b>	<b>34</b>	<b>35</b>
<b>8 (Apr-May)</b>	<b>36</b>	<b>37</b>	<b>38</b>	<b>39</b>	<b>40</b>
<b>9 (May-Jun)</b>	<b>41</b>	<b>42</b>	<b>43</b>		
<b>Total admissions at the end of the plan year</b>	<b>35</b>				<b>8</b>

Assuming that turnover is proportionally distributed between elderly and non-elderly units, SAHA expects the number of elderly households at Fair Avenue to increase to 123 by the end of the plan year.

<b>Household Type</b>	<b>Current number of units</b>	<b>Number made available due to turnover (subtract)</b>	<b>Number offered based on admissions preference (add)</b>	<b>Net change</b>	<b>Total number at end of plan year</b>
Non-Elderly Disabled	106	-21	+8	-13	93
Elderly	110	-22	+35	+13	123

At the net rate of 13 units per year, Fair Avenue will reach the goal of adding 63 elderly households in 4 to 5 years.

The variable that SAHA knows the least about today is how turnover will be distributed between elderly and non-elderly households. This calculation assumes that turnover is proportionally distributed between the household types. As the year progresses and actual data comes in, this assumption can be corrected with a better projection.

### **WC White**

The total number of units at WC White is 75, making 60 the 80% target for elderly households. Currently, WC White is home to 38 elderly (62 and over) households. So the community needs to add 22 elderly households to meet the 80% target. The turnover rate for WC White last year was 25.33% (1.6 units per month), or 19 units over the course of the year.

If the turnover rate is the same for this plan year SAHA expects those 19 available units to be offered to 16 elderly households and 3 non-elderly disabled households. Specifically, the first four available units would be offered to elderly households, and the fifth available unit would then be offered to a non-elderly disabled household. The sixth through ninth units would be offered to elderly households, and the tenth to a non-elderly disabled household. That sequence, repeated through the year in 3 full cycles and 1 partial cycle, is represented in the following table, where “E” represents Elderly Household and “NE” represents Non-elderly Disabled Household.

<b>WC White: Admissions cycle and estimated time frame based on turnover rate of 1.6 units per month</b>	<b>E</b>	<b>E</b>	<b>E</b>	<b>E</b>	<b>NE</b>
<b>1 (Jul – Sep)</b>	1	2	3	4	5
<b>2 (Oct-Dec)</b>	6	7	8	9	10
<b>3 (Jan-Apr)</b>	11	12	13	14	15

<b>4 (Apr-Jun)</b>	<b>16</b>	<b>17</b>	<b>18</b>	<b>19</b>	
<b>Total admissions at the end of the plan year</b>	<b>16</b>				<b>3</b>

Assuming that turnover is proportionally distributed between elderly and non-elderly units, SAHA expects the number of elderly households at WC White to increase to 44 by the end of the plan year.

<b>Household Type</b>	<b>Current number of units</b>	<b>Number made available due to turnover (subtract)</b>	<b>Number offered based on admissions preference (add)</b>	<b>Net change</b>	<b>Total number at end of plan year</b>
Non-Elderly Disabled	<b>37</b>	<b>-9</b>	<b>+3</b>	<b>-6</b>	<b>31</b>
Elderly	<b>38</b>	<b>-10</b>	<b>+16</b>	<b>+6</b>	<b>44</b>

At the net rate of 6 units per year, Fair Avenue will reach the goal of adding 22 elderly households in 3 to 4 years.

The variable that SAHA knows the least about today is how turnover will be distributed between elderly and non-elderly households. This calculation assumes that turnover is proportionally distributed between the household types. As the year progresses and actual data comes in, this assumption can be corrected with a better projection.

### **Metrics and Data**

Data for metrics will be gathered from existing databases, including Elite.

## HUD Standard Metrics

<b>HC #5: Increase in Resident Mobility</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total number of elderly households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	148	167	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
At Fair Avenue, number of elderly households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	110	123	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
At WC White, number of elderly households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	38	44	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

## SAHA Metrics

<b>Elderly Household Percentage</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
At Fair Avenue, percentage of units occupied by elderly households.	110 of 216 total units (51%)	123 of 216 total units (57%)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
At WC White, percentage of units occupied by elderly households.	38 of 75 total units (51%)	44 of 75 total units (59%)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

### Authorizations

MTW Agreement Attachment C, Section C2 (Local Preferences and Admission and Continued Occupancy Policies and Procedures): The Agency is authorized to develop and adopt local preferences and admission policies and procedures for admission into the public housing program in lieu of HUD statutes, regulations or other requirements based in the 1937 Act so long as the families assisted qualify as low income, and that the total mix of families assisted meets the requirements of part I.C of the Amended and Restated MTW Agreement. The Agency is required to revise the Admissions and Continued Occupancy Policy (ACOP), to implement changes in public housing occupancy policy as a result of the MTW program. Regardless of changes to the Agency’s adopted ACOP policies and procedures, the Agency must comply with Sections I(B)(1) and II(D) of this

Agreement. The Agency is subject to state and local preferences law. This authorization waives certain provisions of Section 3 of the 1937 Act and 24 C.F.R. 960.206 as necessary to implement the Agency's Annual MTW Plan.

This authorization is necessary to develop and adopt specific admission policies for the two properties listed in the activity.

### **FY2015-3 Modified Project Based Vouchers**

This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost effectiveness. This activity modifies the standard Project Based Voucher program in two ways.

First, this activity allows SAHA to commit vouchers to developments in SAHA's new and existing properties. The vouchers increase the number of units that are affordable to households based on their actual ability to pay. For example, a tax credit rent affordable to a 30% AMI household will be affordable to a 4-person household earning \$17,640 or more. However, many households earn much less than that, and a 4-person household earning \$10,000 (typical for SAHA-assisted households) is not able to afford a tax credit rent affordable to a 30% AMI household.

SAHA may commit vouchers to San Juan Homes III, Wheatley Courts, Victoria Commons, or any other SAHA-owned or SAHA-controlled development. This activity applies only to commitment of vouchers to SAHA-owned or controlled units. Any commitment of vouchers to privately-owned developments will be made through a competitive process outside the scope of this activity.

Secondly, this activity also increases cost effectiveness by removing the automatic provision of a tenant-based voucher to a household who wishes to relocate from a unit associated with local project based set aside voucher. This stabilizes overall occupancy at the communities where vouchers are committed. Previously, activity FY2011-8 provided a tenant-based voucher to a household after two years in the local project based set aside unit.

SAHA does not anticipate any significant or non-significant changes to this activity in the Plan year, nor to metrics, baselines, or benchmarks.

**Metrics and Data**

**HUD Standard Metrics**

<b>CE #1: Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
San Juan III	# of units * average per unit cost (PUC) * 12 months  31 * \$563.38 * 12 = \$209,577	\$0.00	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Wheatley Courts	10 * \$563.38 * 12 = \$67,606	\$0.00	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Victoria Commons	39 * \$563.38 * 12 = \$263,662	\$0.00	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**CE #2: Staff Time Savings**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
San Juan III	# of recertifications after 2 years (due to new biennial recertification schedule) * average staff time per recertification (in hours)  31 * 1.5 = 47 hours	0 hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Wheatley Courts	10 * 1.5 = 15 hours	0 hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Victoria Commons	31 * 1.5 = 59 hours	0 hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

## SAHA Metrics

<b>HC #1: Additional Units of Housing Made Available</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
# of additional units made affordable to households based on their actual ability to pay (at or below 80% AMI)	0	80	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
San Juan III (units at or below 60% AMI)	0	31	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Wheatley Courts(units at or below 60% AMI)	0	10	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Victoria Commons Chavez Multifamily	0	39	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>Occupancy Rate</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Occupancy Rate at properties where local project based set aside vouchers are committed	<i>Metrics listed by community below.</i>			
Springhill	71%	80%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
San Juan III	0%	98%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Wheatley Courts (Choice Neighborhood)	0%	98%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Victoria Commons Chavez Multifamily	0%	98%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>Median household income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Median income of households living in local project based set-aside voucher units, by income bracket				
80% AMI	80% AMI	75% AMI	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
60% AMI	60% AMI	55% AMI	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
50% AMI	50% AMI	45% AMI	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
30% AMI	30% AMI	25% AMI	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

### **Authorizations**

MTW Agreement Attachment C, Section D1(b) (Operational Policies and Procedures): The Agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued.

This authorization is necessary in order to remove the mobility option associated with project based vouchers.

MTW Agreement Attachment C, Section D7(a) (Establishment of an Agency MTW Section 8 Project Based Program): The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering. If the Agency chooses to project-base Section 8 assistance at such properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion.

This authorization is necessary to project-base vouchers in SAHA-owned or SAHA-controlled properties.

## **FY2015-4      Simplified Utility Allowance Schedule**

This activity is designed to meet the statutory objective of increasing cost effectiveness.

Currently, SAHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents reasonable utility cost expectations as part of a tenant's lease. The Utility Allowance Schedule is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric).

This activity establishes a new, simplified schedule that is based on the analysis of data collected from SAHA's existing HCV portfolio including the most common structure and utility types. The simplified schedule reduces administrative costs associated with the traditional method of applying a Utility Allowance Schedule. Specifically, the activity will allow the HCV department to be more cost effective by reducing staff time spent on calculating multiple utility schedules for 6 different structure types plus various utility types such as gas, electric or propane.

Note that this activity applies only to HCV participants that are **not** part of FY2015-1 MDRC/HUD Rent Study. If a household is selected to participate in the control or treatment group of the Rent Study, they will be subject only to FY2015-1, and not this activity FY2015-4.

The simplified utility allowance schedule is also anticipated to benefit property owners, who will have a more accurate understanding of the total gross rent to be applied to their properties, and to benefit participants, who will be able to use this new schedule to clarify gross rent in their selection of housing units.

The new utility allowance schedule is implemented at the time of recertification, interim or change of unit. The schedule will be applied to the lesser of these two options:

- the actual size of the unit, or
- the size of the voucher.

SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

Based on current utility rates the simplified schedule is:

Bedroom Size	0	1	2	3	4	5	6
Utility cost (\$)	75	94	124	174	214	277	290

## Impact Analysis

SAHA anticipates a cost savings from the implementation of the simplified utility allowance schedule. The impact of the proposed policy change on HCV participants is varied – some will see no change, some will see a utility allowance increase, while others will experience a utility allowance decrease.

Based on data from March, 2014, the following tables summarize the percentage of clients positively and negatively impacted. This table shows percentage of households expected to experience an increase or decrease in utility allowance:

Bedroom Size	No Utility Allowance/ No Change	Increase	Decrease	No Change
0	25.00%	16.67%	58.33%	0.00%
1	16.94%	45.87%	36.75%	0.44%
2	12.49%	47.89%	39.43%	0.19%
3	6.43%	37.56%	56.01%	0.00%
4	5.43%	14.03%	80.39%	0.15%
5	4.88%	43.90%	31.71%	19.51%
6	20.00%	0.00%	80.00%	0.00%
7	0.00%	0.00%	100.00%	0.00%
	11.60%	42.00%	46.13%	0.27%

While 46% of participants will experience a decrease in their utility allowance, the average impact is \$49.00 to the participant and less than 2% will see a larger than \$100 per month decrease. In addition, 42% of participants will experience an increase in their utility allowance with an average increase of \$41.00.

This table shows the percentage of households that are expected to experience an increase or decrease in tenant rent:

Bedroom Size	Increase	Decrease	No Change
0	33.33%	63.89%	2.78%
1	19.48%	77.80%	2.73%
2	38.13%	53.22%	8.65%
3	42.18%	38.02%	19.79%
4	56.71%	18.10%	25.19%
5	58.54%	17.07%	24.39%
6	60.00%	0.00%	40.00%
7	100.00%	0.00%	0.00%
	34.74%	53.99%	11.27%

### Metrics and Data

Data for metrics will be gathered from existing databases, including Elite.

### HUD Standard Metrics

<b>CE #1: Agency Cost Savings</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	0.17 hours multiplied by 11,727 households = 1850 hours multiplied by average staff cost \$15.25	0.09 hours multiplied by 10,881 households = 979 hours multiplied by average staff cost \$15.25	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	\$28,212.50	\$14,929.75		

<b>CE #2: Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>Time to Determine Utility Allowance</b>	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours): <b>0.17 hours times 11,727 households = 1850 hours</b>	0.09 hours times 10,881 households = <b>979 hours</b>	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>CE #3: Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	Utility Allowance Error Rate = 2%	Utility Allowance Error Rate = 2%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>CE #5: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

## **Hardship Policy**

Households will have recourse to the same hardship policy described in FY2014-6 Rent Simplification activity. Households who experience a rent increase of \$26 or more due to the rent simplification calculation will be granted a hardship exemption and have the household's TTP calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). If the rent increase is not directly related to utility allowance increase, the TTP calculation will include the simplified utility allowance.

Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each recertification.

## **Authorizations**

MTW Agreement Attachment C, Section D. 2 (a) Rent Policies and Term limits. SAHA is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant based assistance. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

This authorization is necessary to develop and set a simplified utility schedule.

## IV. Approved MTW Activities

### A. Implemented Activities

#### FY2011-1e      Preservation and Expansion of Affordable Housing

This activity is designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year.

Under SAHA's broader uses of funds authority, Attachment D, the agency can use MTW funding for local, non-traditional units providing that the activities meet the requirement of the MTW statute. While SAHA has had the authority to utilize this flexibility since 2011, the Agency has not utilized it for the construction of new units; all past development reported under this activity in past years occurred outside the scope of MTW as it used other funding sources including tax-credits, HOME funding, CDBG, and other local and state funding.

SAHA will begin utilizing this ability to fund local, non-traditional units in combination with a new flexibility to combine replacement housing factor (RHF) funds with the MTW block grant; the Agency executed an RHF amendment and approved RHF Plan that was approved by HUD in FY2014.

This activity is designed to increase housing choices. It operationalizes the expansion policies adopted in FY2011 by utilizing the local, non-traditional unit authorization under SAHA's broader uses of funds authority and securing the approval to combine RHF funds into the MTW block grant; which requires the Agency to construct new affordable units (defined as units reserved for households with income at or below 80% AMI). While SAHA may develop new communities with market-rate units in addition to affordable units; this activity does not authorize the use of RHF funds for the development of those market-rate units. It is also important to note that SAHA's flexibility to construct new Section 8/9 units are authorized under the single-fund flexibility only and outcomes are reported in the sources and uses section of this report (Section V). The only units authorized under this activity are units reserved for households with income at or below 80% AMI that are non-Section 8/9.

#### **Purpose, Goals, Priority Guidelines of the Affordable Housing Preservation and Expansion Policy (P&E Policy)**

On May 12, 2011 the SAHA Board of Commissioners adopted the Affordable Housing Preservation and Expansion Policy (P&E Policy). The P&E Policy establishes the principles, goals, priorities and strategies that SAHA intends to pursue to preserve and expand the supply of high quality, sustainable and affordable housing in San Antonio.

## **Purpose**

SAHA is committed to implementing a work plan to preserve and expand its affordable housing portfolio. In San Antonio, an estimated 200,000 households are eligible for some form of housing assistance. In order to address the demand for this housing, SAHA has prepared a work plan that reflects project priorities for both expansion and preservation to meet this demand. This has become increasingly important as the SAHA existing public housing portfolio is quite old, yet it is a valuable source of affordable rental housing. In order to meet this demand a combination of preserving existing housing stock and adding to the affordable housing available to households in San Antonio has been developed. In addition, SAHA has commissioned a Capital Needs Assessment that will provide more detailed information on the capital improvement needs of its portfolio. The cost of needed property improvements exceeds the available resources; thus limited resources need to be used effectively and efficiently. To guide the use of limited funding, SAHA's Board of Commissioners has adopted policies that guide the work undertaken by staff in collaboration with a number of partners to effectively use limited resources, add value to the portfolio and decision making on property preservation, expansion or redevelopment, and disposition.

## **Goals**

- Goal One: To maintain existing levels of deeply subsidized housing and create new affordably priced housing through the acquisition, new construction and rehabilitation of existing affordable housing.
- Goal Two: To increase the quality, value, marketability and energy efficiency of all properties in the SAHA portfolio.
- Goal Three: Actively pursue emerging development and redevelopment opportunities that meet multiple community goals, such as economic and transit oriented development, while adding to the affordable housing infrastructure for San Antonio.
- Goal Four: To integrate economic development and supportive service initiatives that will support residents and the surrounding neighborhoods in existing properties as well as in new and redeveloping projects.
- Goal Five: Increase housing choices and the availability of housing for special populations through supportive housing (e.g. youth aging out of foster care, homeless individuals and families etc.).

## **Priority Guidelines**

SAHA has established a set of guidelines against which all properties are evaluated. These guidelines take into consideration the age and condition of the property, past property improvements and the amenities in the area, to include schools, shopping, transit and employment. In addition,

projects located in areas where other community investment is being made or anticipated are given priority. These guidelines are applied to both preservation and expansion activities:

1. Properties that are in good locations and with average building conditions are deemed to be good candidates for additional capital investment. This is because investment today will prevent further deterioration of a property and will maintain or improve revenue generation for SAHA as well as enhance livability. In addition, SAHA will integrate capital improvements on several projects in order to make significant change in the livability, appearance and functionality of a development. In other words, substantial rehabilitation will be completed. The work plan also allows SAHA to undertake capital projects to address health and safety issues where a substantial rehabilitation is not needed.

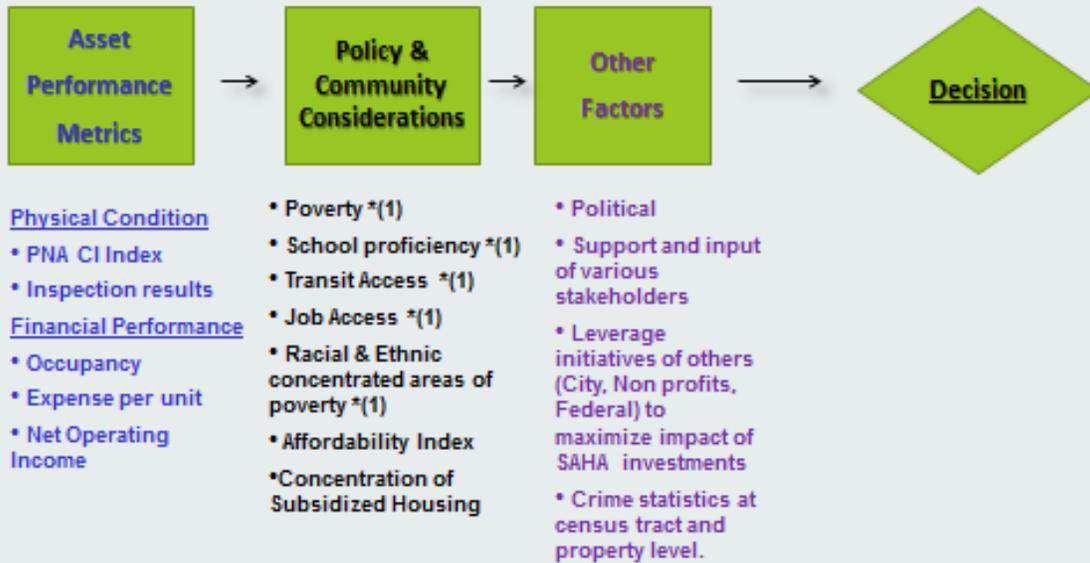
2. New developments that are in locations where additional community investment is being made are a priority.

### **Portfolio Evaluation Process**

In October 2013, at the direction of the President and CEO, an internal Physical Needs Assessment (PNA) Task Force was created, to develop a standardized, objective process to evaluate individual assets in the SAHA portfolio.

On December 6, 2013, the Board of Commissioners was provided a presentation that summarized the results of the PNA, performed by Raba Kistner Associates, of SAHA's Public Housing and Non-Profit portfolios.

# Factors of Portfolio Evaluation Process



<sup>\*(1)</sup> Components of HUD's prototype for proposed Affirmatively Furthering Fair Housing Initiative.



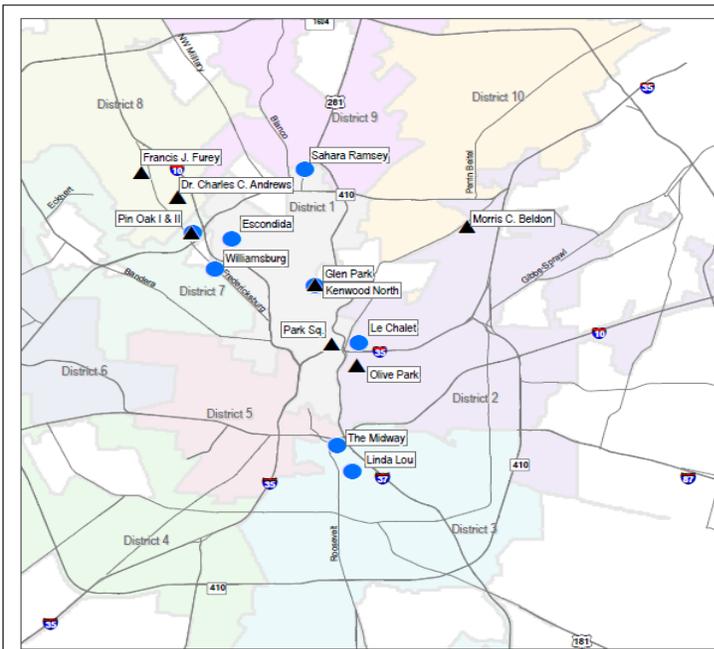
The methodology was then utilized to identify and prioritize short-term and long-term initiatives to address items identified in the PNA, while incorporating the goals and objectives outlined in SAHA's Affordable Housing Preservation & Expansion Policy, as adopted by the Board on May 12, 2011.

## Asset Management Plan

On March 6, 2014, the SAHA Board of Commissioners heard an update regarding a newly-developed five-year Asset Management Plan for the preservation and expansion of affordable housing. The Asset Management Plan adds an implementation element to the previously adopted principles, policies, and goals. The Asset Management Plan represents staff's recommendation of the best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy. Over the next 5 years, SAHA is recommending implementation of the following initiatives:

- 1. Invest approximately \$18.3 million in capital repairs to extend the useful life of 471 Public Housing units located in 15 properties.**

5 YEAR PLAN FOR PUBLIC HOUSING											
AFFORDABLE HOUSING PRESERVATION											
Property Name Address	Council District	Elderly = E Family = F	# of Units	Year Built	PNA Priorities 1-3	PNA Priorities 1-3 Cost per Unit	Year #1	Year #2	Year #3	Year #4	Year #5
Charles Andrews 4060 Medical Drive	8	F	52	1995	\$2,879,484	\$55,374.69	\$2,879,484				
Le Chalet 832 East Grayson	2	E	34	1971	\$1,277,670	\$37,578.53	\$1,277,670				
Morris Beldon 7511 Harlow	2	F	35	1980	\$912,870	\$26,082.00	\$912,870				
Francis Furey 4902 Gus Eckert Ln	8	F	66	1988	\$3,909,804	\$59,239.45		\$3,909,804			
Kenwood North 121 Avenue M	1	E	53	1975	\$938,927	\$17,715.60		\$938,927			
Park Square 800 E. Park	1	F	26	1976	\$989,170	\$38,045.00		\$989,170			
Pin Oak I 7190 Oaklawn	7	E	50	1979	\$1,944,637	\$38,892.74			\$1,944,637		
Pin Oak II 7180 Oaklawn	7	F	22	1981	\$61,118	\$2,778.09			\$61,118		
Sahara Ramsey 10004 Sahara	9	E	16	1975	\$521,339	\$32,583.69			\$521,339		
Glen Park 121 Avenue M	9	F	26	1999	\$1,240,881	\$47,726.19				\$1,240,881	
Williamsburg 118-120 Williamsburg	1	E	15	1971	\$657,400	\$43,826.67				\$657,400	
Midway 545 E. Mitchell	5	E	20	1975	\$701,096	\$35,054.80				\$701,096	
Olive Park 1015 N. Olive	2	F	26	1975	\$1,863,614	\$71,677.46					\$1,863,614
Linda Lou 124 Linda Lou	3	E	10	1972	\$185,106	\$18,510.60					\$185,106
Escondido 2514 Vance Jackson	1	E	20	1971	\$201,905	\$10,095.25					\$201,905
<b>Family</b>			<b>253</b>								
<b>Elderly</b>			<b>218</b>		<b>Years 1-5</b>	<b>Ave. Cost per Un.</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
<b>F &amp; E</b>			<b>471</b>	<b>TOTAL</b>	<b>\$18,285,021</b>	<b>\$38,821.70</b>	<b>\$5,070,024</b>	<b>\$5,837,901</b>	<b>\$2,527,094</b>	<b>\$2,599,377</b>	<b>\$2,250,625</b>



Data Sources: COSA; SAHA; BM911

Date: 3/5/2014

Disclaimer: The San Antonio Housing Authority has attempted to assure the accuracy of GIS data, information, and maps for its internal uses and for no other purposes. We advise they are to be used as an informational tool only; and are not meant to be used for projects requiring survey accuracy. Because the San Antonio Housing Authority collects most GIS data from multiple public and private sources and the data, information, and maps are dynamic and in a constant state of maintenance, correction and update, data accuracy cannot be guaranteed. Please contact the Planning, Policy, and Public Affairs Department at (210) 477-8122 to report any data inaccuracies. The GIS data, information, and maps are not to be sold or redistributed without the permission of the San Antonio Housing Authority.

### Preservation & Expansion 5 Year Plan (2014-2018)

Name (Elderly or Family-E/F)	Units	Total Cost
Charles Andrews (F)	52	\$2,879,484
Le Chalet (E)	34	\$1,277,670
Morris Beldon (F)	35	\$912,870
Francis Furey (F)	66	\$3,909,804
Kenwood North (E)	53	\$938,927
Park Square (F)	26	\$989,170
Pin Oak I (E)	50	\$1,944,637
Pin Oak II (F)	22	\$61,118
Sahara Ramsey (E)	16	\$521,339
Glen Park (F)	26	\$1,240,881
Williamsburg (E)	15	\$657,400
Midway (E)	20	\$701,096
Olive Park (F)	26	\$1,863,614
Linda Lou (E)	10	\$185,106
Escondido (E)	20	\$201,905
<b>TOTAL</b>	<b>471</b>	<b>\$18,285,021</b>

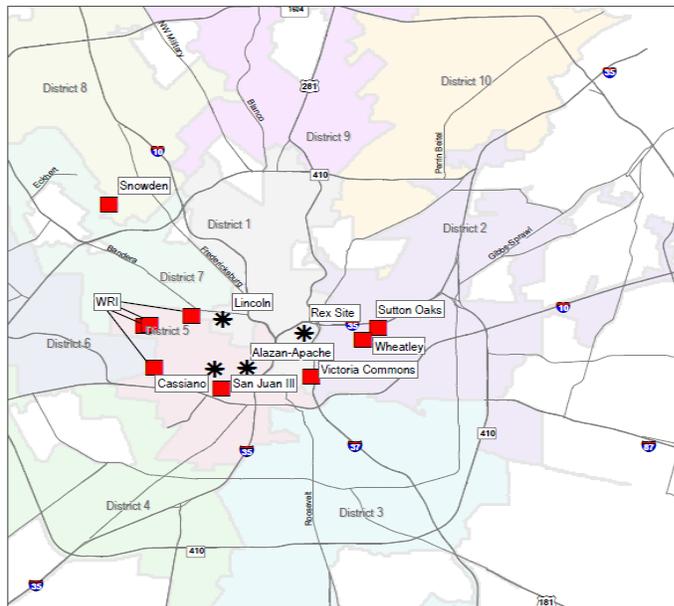
Public Housing  
 ● Elderly/Disabled (8 properties, 218 units)  
 ▲ Family (7 properties, 253 units)



**2. Construct 1,489 new housing units in 6 development projects at an estimated cost of \$221.9 million.**

<b>\$221.9 MM Investment in Redevelopment from 2014-2018</b>										
Project	Council District	Projected Total Units	Home Ownership	Mkt Rate Units	Workforce Housing Units	Public Housing Units	Project Based Voucher	Total Development Cost	Construct. Start Date	Anticipated Completion Date
<b>The Park at Sutton Oaks Ph.I</b> 1010 Locke St.	2	208	0	46	113	49	0	\$29,411,389	Oct-12	Jun-14
<b>San Juan III</b> Zarzamora St.	5	252	0	0	158	63	31	\$31,034,088	Sep-13	Dec-14
<b>Westside Redevelopment Initiative (WRI)</b>	5	87	87					\$9,000,000 (e)	Dec-14	Dec-15
<b>Wheatley Courts Choice Ph. II</b> Seniors OnSite Ph. III Multi Family Ph. IV	2	220	0	64	75	71	10	\$33,452,999	Jan-15	Dec-16
		80	0	0	4	48	28	\$9,385,000	Sep-15	Dec-16
		123	0	55	28	34	6	\$19,280,000	Sep-16	Dec-17
<b>Victoria Commons - A.P. TH's</b> Between Refugio & Leigh St. Leigh St. Homes <b>Victoria Commons IV</b> Chavez at Labor St.	1	98	98					\$22,050,000 (e)	Pending	Pending
		26	26					\$6,500,000 (e)	Apr-14	Apr-15
		215	0	133	43	28	11	\$36,605,078	2016	2018
<b>Snowden @ Medical Center</b> 7223 Snowden Rd	8	180	0	100	44	36		\$25,200,000 (e)	2015	2017
<b>TOTALS</b>		<b>1,489</b>	<b>211</b>	<b>398</b>	<b>465</b>	<b>329</b>	<b>86</b>	<b>\$221,918,554</b>		
<b>PERCENTAGE</b>		<b>100%</b>	<b>14%</b>	<b>27%</b>	<b>31%</b>	<b>22%</b>	<b>6%</b>			

(e) = Estimate



Data Sources: COSA; SAHA; BM911

Date: 3/9/2014

Disclaimer: The San Antonio Housing Authority has attempted to ensure the accuracy of GIS data, information, and maps for its internal uses and for no other purposes. We advise they are to be used as an informational tool only, and are not meant to be used for projects requiring survey accuracy. Because the San Antonio Housing Authority collects most GIS data from multiple public and private sources and the data, information, and maps are dynamic and in a constant state of maintenance, correction and update, data accuracy cannot be guaranteed. Please contact the Planning, Policy, and Public Affairs Department at (210) 477-8122 to report any data inaccuracies. The GIS data, information, and maps are not to be sold or redistributed without the permission of the San Antonio Housing Authority.

**Preservation & Expansion**  
5 Year Plan (2014-2018)

Name	Projected Total Units (PH Units)	Total Development Cost
The Park at Sutton Oaks	208 (94)	\$29,411,389
San Juan III	252 (94)	\$31,034,088
Westside Redevelopment Initiative (WRI)	87	\$9,000,000 (e)
Choice Neighborhood Initiative		
Wheatley Courts Choice Ph. II	220 (91)	\$33,452,999
Seniors OnSite Ph. III	80 (28)	\$9,385,000
Multi Family Ph. IV	117 (24)	\$19,280,000
Victoria Commons		
Urban Park Townhomes	98	\$11,210,000 (e)
Leigh St. Homes	26	\$6,500,000 (e)
Victoria Commons IV	220 (98)	\$22,050,000 (e)
Snowden @ Medical Center	180 (26)	\$25,200,000 (e)
<b>TOTAL</b>	<b>1,484 (819)</b>	<b>\$184,375,477</b>

(e) = estimate

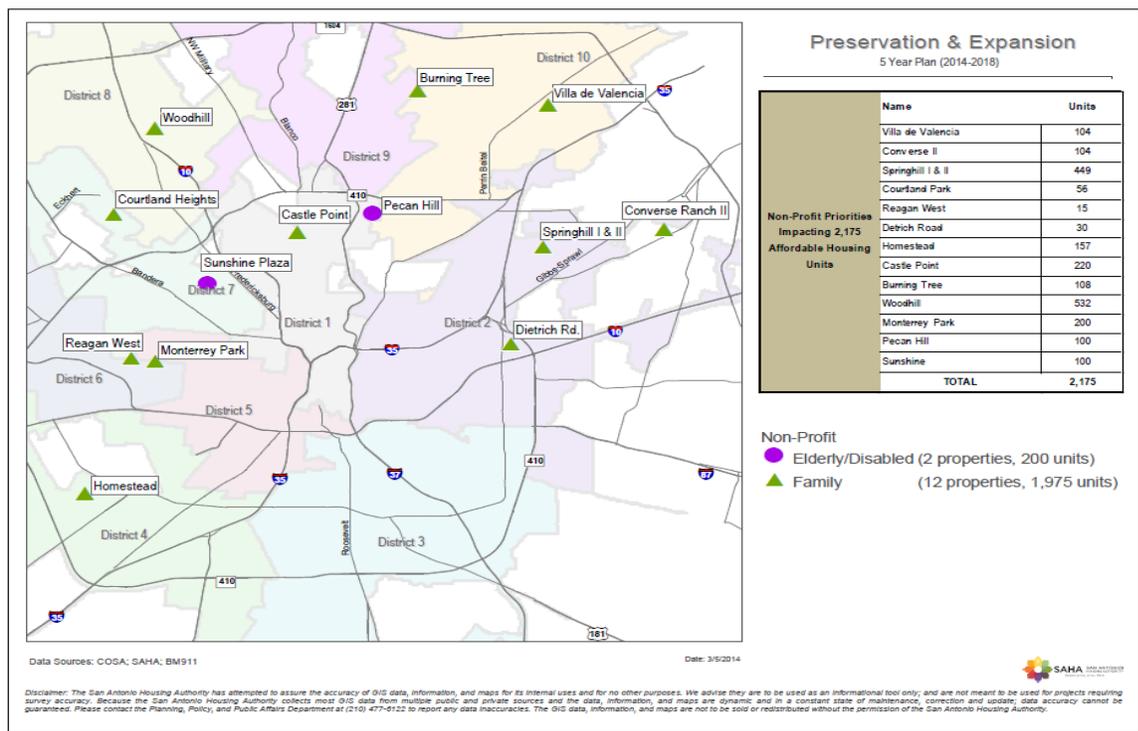
**Development**

- Redevelopment Properties (6 Projects, 1,494 units)
- ✱ Redevelopments Under Consideration (4 projects)



### 3. Evaluate modernization and repositioning opportunities impacting 2,175 affordable housing units in the Non-Profit portfolio.

SALE OF ASSET				
Property Name	Unit Count	Recommendation	Year	Comments
Villa de Valencia	104	Sale of asset	2014	Low physical/financial score = 40; Significant foundation issues; CI =45%; Property has no debt.
<b>Subtotal</b>	<b>104</b>			
REFINANCE OF ASSET				
Property Name	Unit Count	Recommendation	Year	Comments
Converse II	104	Refinance	2014	Existing Mortgage matures June 11, 2014.
<b>Subtotal</b>	<b>104</b>			
EVALUATE REPOSITIONING OF ASSET				
Property Name	Unit Count	Recommendation	Year	Comments
Springhill I & II & Courtland Park	505	Evaluate repositioning of asset	2015	Determine if projected net sale proceeds would be sufficient to retire outstanding bonds and related costs; Low physical/financial score = 55; Low policy & community scores.
Reagan West	15	Evaluate repositioning of asset	2015	Low physical/financial score= 60; Low policy & community scores; Small property (15 units); No debt.
Detrich Road	30	Evaluate repositioning of asset	2016	Low physical/financial score = 80; Low policy & community scores; Property isolated and located in industrial area; No debt.
Homestead	157	Evaluate repositioning of asset	2018	Low physical/financial score = 55; Low policy & community scores; Barely break-even operations with minimal debt; No prepayment penalty on debt.
<b>Subtotal</b>	<b>707</b>			
EVALUATE PRESERVATION/MODERNIZATION OF ASSET				
Property Name	Unit Count	Recommendation	Year	Comments
Castle Point / Burning Tree	220/108	Evaluate modernize/refinance	2014-2015	Castle Point: Good physical/financial score =90; Good policy & community scores; Significant equity; No prepayment penalty on existing debt. Burning Tree: Good physical/financial score=110; Good policy & community scores; Significant equity; No prepayment penalty on existing debt.
Woodhill	532	Implement preservation Capex projects	2014-2015	Obtain ELT approval for Capex project of \$3.6 MM using funds released from HUD and completion repair from Frost Bank refinance.
Monterrey Park	200	Evaluate modernize/refinance	2016-2017	Low physical/financial performance =70; Scores well on policy & community attributes; Located in REnewSA & ICRIP location; Larger property with 220 units; Existing loan has no prepayment penalty and there is significant equity in the asset.
Pecan Hill	100	Evaluate modernize/refinance	2017- 2018	High physical/financial score =95; Scores well on policy & community attributes; No debt.
Sunshine	100	Evaluate modernize/refinance	2017-2018	High physical/financial score =90; Scores well on policy & community attributes; No debt.
<b>Subtotal</b>	<b>1260</b>			
<b>TOTAL</b>	<b>2175</b>			



## **Future Updates**

Possibilities for inclusion in future updates to the Asset Management Plan include:

- Rex Site: Potential Transit-Oriented Development
- Choice Redevelopment Candidates:
  - Alazan-Apache Courts (741 units)
  - Cassiano Homes (499 units)
  - Lincoln Heights Courts (338 units)

## **Exceptions**

The agency may consider disposition projects not identified in the MTW plan if they are deemed excess inventory and not supportive of the 2020 Strategic Plan. The agency may also consider unique, opportunistic, and unscheduled acquisition or construction projects that are not included in the MTW plan, but are supportive of the agencies 2020 Strategic Plan.

Such activities will not be considered significant amendments to the MTW plan, provided the following internal protocols are followed:

- 1) Completion of analysis describing the cost and benefits of the contemplated action.
- 2) Consultation with other agency plans
- 3) Approval by ELT (and appropriate committee and Board of Commissioners if necessary)
- 4) The financial impact or cost of the activity is 5% or less of the annual expenses reflected in the current approved annual budget for the agency.

## **Approvals**

The results of this analysis and proposed five-year plan for the preservation and expansion of affordable housing was presented to the Finance Committee on February 20, 2014. The Finance Committee recommended presenting this matter to the Board at the March 6, 2014 meeting for any additional input.

SAHA does not anticipate any significant or non-significant changes to this activity in the Plan year, nor to metrics, baselines, or benchmarks.

**Metrics and Data**

**HUD Standard Metrics**

<b>HC #1: Additional Units of Housing Made Available</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	158 (1070 over five years)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
The Park at Sutton Oaks	0	49 PH + 113 Workforce = 162 new units	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
San Juan 3	0	94 PH + 158 Workforce = 252	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>HC #2: Units of Housing Preserved</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	121 (471 over five years)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Charles Andrews	0	52	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Le Chalet	0	34	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
Morris Beldon	0	35	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**FY2011-9      Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services**

This activity is designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year.

SAHA allocates set-aside of tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside would be for households with specific priority needs, such as those who are homeless. Current partners are The Center for Health Care Services (CHCS) and San Antonio Metropolitan Ministries (SAMM).

CHCS and SAMM provide a needs assessment of the household in order to qualify and certify them as homeless as defined by HUD. Once the household is determined eligible by CHCS and SAMMs, the household is referred by CHCS/SAMMs to SAHA and placed on the waiting list. When the household is selected from the SAHA waiting list, SAHA processes all referrals in accordance with HUD guidelines and the SAHA Voucher Program Administrative Plan. The household is scheduled for an appointment with SAHA staff to determine eligibility. Once the household is determined eligible they complete documents necessary for processing. One requirement of the program is that CHCS and SAMM provide intensive case management for one year to every household participating in the program. CHCS and SAMM provide reports to SAHA on a quarterly basis.

The set-aside program was implemented in December 2011. Since implementation SAHA has leased up 195 participants of which 31 have terminated the program. SAHA does not anticipate any significant or non-significant changes to this activity in the Plan year, nor to metrics, baselines, or benchmarks.

**HUD Standard Metrics**

<b><i>HC #7: Households Assisted by Services that Increase Housing Choice (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	0	200 households utilizing committed vouchers	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**SAHA Metrics**

<b><i>Maintain Households Served</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Percentage of households served that continue to be housed after 2 years	0	90% of households successfully housed after 2 years	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

## **FY2013-1 Time-limited Working Household Preference Pilot Program**

This activity is designed to increase housing choices and promote self-sufficiency, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation started in FY2014.

This pilot project (max 200 households) for public housing residents creates an optional working household waiting list preference to provide time-limited housing assistance. Working 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. Elderly or disabled are eligible for the optional working household preference regardless of work status.

When this preference became available, SAHA informed 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 ensures 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 receives case management services from a FSS Case Manager who maintains close communication with the family and 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 Time-limited Working Household Preference Pilot program was initiated in FY2014 after the completion of significant software changes and the roll out of a new on-line application process.

SAHA does not anticipate any significant or non-significant changes to this activity in the Plan year, nor to metrics, baselines, or benchmarks.

### **HUD Standard Metrics**

<b><i>SS #1: Increase in Household Income</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average income of participating households (Average earned income of households affected by this policy in dollars (increase)).	\$10,400: Median earned income of all current working PH households	10% increase by end of participation	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
		\$11,440		

**SS #3: Increase in Positive Outcomes in Employment Status**

*Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.*

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>(6) Other (Heads with any Earned Income)</b>	Heads of households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Actual head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	200	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Actual percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	0	100%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	0	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #5: Households Assisted by Services that Increase Self Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of qualified households selecting this preference (Number of households receiving services aimed to increase self-sufficiency (increase) )	0	200	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**SS #8: Households Transitioned to Self Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II)	Households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).	Actual households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.

Operating Information in the space provided.	0	FY2015- 0 (Year 5-200)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
--	---	------------------------	---------------------------------	---------------------------------

<b>HC #3: Decrease in Wait List Time</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average Working family preference applicant time on wait list in months (decrease).	16.8 months (1.4 years).	2 months	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

### SAHA Metrics

<b>Average Years of Participation</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average time spent on assistance	0	5	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>Hardship Rate</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Rate of hardship requests	0	0.05	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>Average Length of Term of Employment (YTD)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average length of term of employment	0	12 months	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

## **FY2013-2 Simplified Earned Income Disregard (EID) (Public Housing)**

This activity is designed to promote self-sufficiency, and increase cost effectiveness, and was originally approved as part of the FY2012-2013 MTW Plan.

This activity expands the number of months for which EID is available to participants to 60 months, and makes the benefit 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: 80%
- Year 3: 60%
- Year 4: 40%
- Year 5: 20%

Head, spouse, or co-head of household qualifies entire household (formerly only Head of Household could participate).

As of FY2014, the only participants in this activity have included households enrolled in the Jobs-Plus Program. SAHA has completed research on the ability to reconcile various program requirements around escrows and EID for FSS participants. Because the program requirements cannot be reconciled, FSS participants are no longer eligible for the SEID.

### **HUD Standard Metrics**

<b>SS #1: Increase in Household Income (PH)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase). (Amount of Income disregarded (average per year))	\$11,000	\$12,100	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>SS #3: Increase in Positive Outcomes in Employment Status</b>				
<i>Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.</i>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in (6) Other (defined as head(s) of	Expected head(s) of households in (6) Other (defined as head(s) of households with	Actual head(s) of households in (6) Other (defined as head(s) of households with	Whether the outcome meets or exceeds the benchmark.

	households with earned income) prior to implementation of activity (percent). This number may be zero.	earned income) after implementation of the activity (number).	earned income) after implementation of the activity (number).	
	0	80	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Actual percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	0	100%	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	0	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #8: Households Transitioned to Self Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).	Actual households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	0	0 (will not see transitions until year 5 of implementation)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**CE #1: Agency Cost Savings**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: SAHA will conduct time study to determine cost of task	Values forthcoming: SAHA will conduct time study to determine cost of task	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**CE #2: Staff Time Savings**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: SAHA will conduct time study to determine time dedicated to task	Values forthcoming: SAHA will conduct time study to determine time dedicated to task	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**CE #3: Decrease in Error Rate of Task Execution**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: SAHA will incorporate new metric into QA/QC process	Values forthcoming: SAHA will incorporate new metric into QA/QC process	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>CE #5: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

### SAHA Metrics

<b>Number of Household Members who take advantage of disregard (average) (PH)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of Household Members who take advantage of disregard (average)	1	1.5	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b>Households Assisted by Services that Increase Self Sufficiency (PH)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase self sufficiency (increase).	5	10	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

**FY2013-4      HQS Inspection of SAHA-owned non-profits by SAHA inspectors**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation began on January 1, 2013.

This activity allows SAHA inspectors (instead of third- party contractors) to inspect and perform rent reasonableness assessments for units at properties that are either owned by SAHA under the Agency’s non-profit portfolio or owned by a SAHA affiliate under the Agency’s partnerships portfolio. At the time of implementation, SAHA’s inspections department was equipped to absorb the additional inspections without the need to add additional full-time or part-time equivalent positions.

SAHA estimated that the impact to the agency would be a cost savings of \$55.46 per inspection. This figure was the projected result of replacing 3<sup>rd</sup>-party contractors with in-house inspectors. At the time of adoption of this activity, the cost of contracting with a 3<sup>rd</sup>-party to conduct 2,391 inspections annually was \$182,478 per fiscal year. That translated into a cost per inspection of \$76.32. The cost per inspection using SAHA staff was estimated at \$20.86. The net savings per inspection was projected to be \$55.46.

As required by HUD, “CE #2: Staff Time Savings” has been added to this activity. While SAHA recognizes HUD’s efforts to standardize metrics across MTW agencies, this metric is not in alignment with the nature of this activity. Agency cost savings in this activity is not the result of staff time savings, but instead of increased efficiency.

**HUD Standard Metrics**

<b>CE #1: Agency Cost Savings (HCV)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	<i>In subsequent MTW Report</i>
	1,758 inspections * \$76.32 \$134,171	1,758 inspections * \$20.86 = \$36,672	<i>In subsequent MTW Report</i>	

**CE #2: Staff Time Savings**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: Number of inspections multiplied by average time per inspection	Values forthcoming: Number of inspections multiplied by average time per inspection	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

## **FY2014-1      Streamline Reexamination Requirements and Methods (HCV)**

---

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year.

While continuing the mandatory use of the Enterprise Income Verification (EIV) report, HCV staff transitioned from the use of third party verification of income from employers to the use of participant-provided documents. SAHA continues to use oral verifications and/or mailed third-party verification in the event of a discrepancy or if documents appear altered. The agency also employs quality control measures to randomly select participant accounts and require additional verification to ensure the integrity of the verification process. Third-party verification of assets is still required for assets totaling a value of \$25,000 or more.

In addition to streamlining methods of document verification, SAHA wanted to reduce the number of applicants and participants resubmitting documents for approved extension of voucher, and/or reasonable accommodations. SAHA has revised its policy to extend the length of time that applicant/participant-provided documents would be valid for verification purposes. Applicant-provided documents dated within 90 calendar days from the eligibility appointment and participant-provided documents dated within 120 calendar days from the reexamination appointment would be valid. This does not apply to permanent documents, such as social security cards, birth certificates, and identification cards. The proposed activity provides flexibility in the design and administration of housing assistance to increase operational efficiency and achieve greater cost effectiveness in federal expenditures.

The department had seven (7) vacant HAS positions during the period. A vendor was selected and assisted with the September and October 2013 recertification appointments. However, due to the backlog of recertifications, Interims and the number of families that missed their recertification appointments. Staff spent most of September and October 2013 conducting recertification appointments for the families that missed their regular scheduled appointments and assisting families that were moving due to HQS, lease expiration, etc.

SAHA will no longer measure the number of office visits since the goal of this activity was to decrease the processing time.

SAHA tracks all interims through a SharePoint database and annual reexams are tracked through Elite software database.

## HUD Standard Metrics

<b>CE #1: Cost Savings (HCV)</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Avg staff time (.25 hours) * avg staff cost per hour (\$15.25)= \$3.81 per recertification	Benchmark time (.17 hours) * avg staff cost per hour (\$15.25) = \$2.59 per certification	Actual Avg staff time (.25 hours) * avg staff cost per hour (\$15.25)	<i>In subsequent MTW Report</i>
	12,133 * 3.81 = \$46,226.73	12,133 * 2.59 = \$31,424.27	<i>In subsequent MTW Report</i>	
<b>CE #2: Staff Time Savings (HCV)</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Avg staff time (.25 hours)	Benchmark time (.17 hours)	Actual Avg staff time (.25 hours)	<i>In subsequent MTW Report</i>
	.25 hours * 12,133 = 3,033	.17 hours * 12,133 = 2,063	<i>In subsequent MTW Report</i>	
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.

	5%	4%	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
--	----	----	-------------------------------------	-------------------------------------

### SAHA Metrics

<b><i>Files Completed in a Timely Manner</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	# of files completed within 30-45 days divided by total # files	# of files completed within 30-45 days divided by total # files	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	% of files completed within 30-45 days: Annuals: 54.7% Interims: 76.7%	% of files completed within 30-45 days: Annuals: 64.7% Interims: 86.7%		

## **FY2014-2      Early Engagement**

This activity is designed to increase housing choices by providing training to support successful participation in SAHA’s assisted housing programs, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year.

This activity establishes a requirement that applicants complete a defined set of courses upon admission to PH or HCV. The courses are designed to provide incoming households with the skills to become successful residents, while establishing clear expectations and minimizing the number of crisis situations over the long term. The curriculum is the product of formal partnerships with other agencies who participate as instructors or advisors in the design and implementation of the courses. Topics include finding the right home/neighborhood, working with landlords, financial literacy, fair housing, safety, upkeep, and sustainability.

Elderly and disabled heads of households are exempt from the requirement, but encouraged to take the courses. Those who successfully complete the courses will receive a certificate. SAHA will communicate to landlords the value of a certified applicant as someone who is better prepared for a successful tenancy.

### **HUD Standard Metrics**

<b><i>HC #7: Households Assisted by Services that Increase Housing Choice</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number).	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households participating in early engagement (increase).	(PH + HCV)	(PH + HCV)	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	0	480		

## SAHA Metrics

<b><i>Negative Program Exits (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households exiting the housing program for a negative reason (decrease).	0	44	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

<b><i>Negative Program Exits (PH)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households exiting the housing program for a negative reason (decrease).	0	41	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

### **FY2014-3 – Faster Implementation of Payment Standard Decreases (HCV)**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan.

Currently, when Fair Market Rent (FMR) is reduced and the payment standard is adjusted accordingly, the reduced payment standard is applied at each participant's second regular reexamination. This activity will allow SAHA to apply the lower payment standards at each participant's next reexamination (Move, Interim and/or Annual reexaminations). If the participant's rent portion increases as a result of applying the new payment standard, SAHA will provide the participant a 30-day notice of rental increase.

The per unit cost will be calculated by the total housing assistance payments divided by the total number of units leased each month. The housing assistance payments expense will be obtained from the monthly financial statements and the total units will be obtained from the Unit Month Report.

#### **HUD Standard Metrics**

<b><i>CE #1: Agency Cost Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	12,129 Annual Average Households Served (FY2014) multiplied by \$568.43	12,129 Annual Average Households Served (FY2014) multiplied by \$537.96	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	\$6,894,487.40	\$6,524,916.80		

## **FY2014-4 – Biennial Reexaminations (HCV & PH)**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan. Activity was scheduled to be implemented January 2014 for the May 2014 reexaminations.

This activity establishes a biennial (instead of an annual) schedule for reexaminations, applicable to all non-elderly/disabled HCV participant households (approximately 8,500 households). This activity disregards 100% of additional household income for two years therefore SAHA will no longer disregard participant's income using the traditional Earned Income Disregard calculation.

SAHA may initially use random selection methods and tools to select voucher participants in scheduling reexaminations. Half of the HCV participants will be on a two-year reexamination cycle starting in the first year and the remainder will be on a two-year cycle starting in the second year of program implementation. Every family will have the option of interim reexamination at any time if there is a change in family composition, reduction in income or an increase in expenses. "All HCV participants, excluding Elderly/Disabled participants on a fixed income, must complete annual reexaminations of their family income and composition. SAHA proposes to conduct biennial reexaminations for all non-elderly/disabled HCV participant households (approximately 8,500 households).

### **HUD Standard Metrics**

<b><i>CE #1: Agency Cost Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Average HAS salary multiplied by 8,500 reexams	Average HAS salary multiplied by 4,250 reexams	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	\$128,350 per year	Cost savings of approximately \$64,175 in year 1 of implementation.	<i>In subsequent MTW Report</i>	
<b><i>CE #2: Staff Time Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	# of potential biennials	# of biennials multiplied by # of hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	8,500 hours per year	Reduce to 4,250 hours per year.	<i>In subsequent MTW Report</i>	

<b>CE #5: Increase in Agency Rental Revenue (PH)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Rental revenue in dollars (increase).	\$10,029,168	\$10,029,168	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #1: Increase in Household Income (PH)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars (increase).	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #3: Increase in Positive Outcomes in Employment Status (PH)**

*Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.*

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>(6) Other (Heads with any Earned Income)</b>	Heads of households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Actual head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Actual percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) (PH)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #8: Households Transitioned to Self Sufficiency (PH)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<p>Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.</p>	<p>Households transitioned to self sufficiency. (Number of households paying a flat rent for at least 6 months) prior to implementation of the activity (number). This number may be zero.</p>	<p>Expected households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).</p>	<p>Actual households transitioned to self sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).</p>	<p>Whether the outcome meets or exceeds the benchmark.</p>
	<p>Values forthcoming</p>	<p>Values forthcoming</p>	<p><i>In subsequent MTW Report</i></p>	<p>Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.</p>

<b>CE #1: Agency Cost Savings (PH)</b>						
<b>Unit of Measurement</b>	<b>Baseline</b>			<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Cost reduction on reexamination process	Total Units	Current Biennial Participants	Net Participants being seen once a year as of 5/14	Staff Hours per year	$(9,402/2 \text{ hours} * .75 * \$21.34) + (9,402/2 \text{ hours} * .25 * \$30.16)$	<i>In subsequent MTW Report</i>
	a	b	(a-b)=c	(c*2)		
	6,004	1,303	4,701	9,402		
	Baseline calculation					
	9,402*.75*\$21.34=		\$150,479.01			
9,402*.25*30.16=		<u>\$70,891.08</u>				
		<u><b>\$221,370.09</b></u>				
	<b>\$221,370.09</b>			<b>\$110,685.05</b>	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
<b>CE #2: Staff Time Savings (PH)</b>						
<b>Unit of Measurement</b>	<b>Baseline</b>			<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Staff time spent on reexaminations	# Annual Reexams (4,701) * Reexam processing time (2 hours)			4,701/2 * 2 hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	9,402 hours			4,701 hours	<i>In subsequent MTW Report</i>	

<b>CE #5: Increase in Agency Rental Revenue(HCV)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #1: Increase in Household Income(HCV)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #3: Increase in Positive Outcomes in Employment Status (HCV)**

*Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.*

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>(6) Other (Heads with any Earned Income)</b>	Heads of households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Actual head(s) of households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Actual percentage of total work-able households in (6) Other (defined as head(s) of households with earned income) after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) (HCV)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

<b>SS #8: Households Transitioned to Self Sufficiency (HCV)</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) after implementation of the activity (number).	Actual households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting

				requirements only. Neutral benchmark (no change expected) has been set.
--	--	--	--	---

## **FY2014-5 – Triennial Reexaminations (HCV)**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan. Activity is scheduled to be implemented January 2014 for the May 2014 reexaminations. This activity established a triennial reexamination schedule for elderly/disabled HCV participant households on a 100% fixed income. This activity disregards 100% of additional household income for three years therefore SAHA will no longer disregard participant's income using the traditional Earned Income Disregard calculation.

Previously, all HCV Elderly/Disabled participants on a 100% fixed income completed a biennial reexamination of their family income and composition. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and pension. Documentation shows that elderly and disabled participants experience minimal income changes each year; typically, the only change is the result of a cost of living increase from the Social Security Administration (SSA).

The inconvenience to the elderly and disabled residents due to excessive reexaminations may pose a physical burden and result in inefficient use of staff time.

As new families are qualified for triennial reexaminations, they are phased in to a 3-year process. Every family will have the option of interim reexaminations at any time if there is a change in family composition, reduction in income or an increase in medical expenses.

SAHA will conduct time studies to verify the number of hours that staff spends on conducting reexaminations.

### **HUD Standard Metrics**

<b><i>CE #1: Agency Cost Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	Average HAS salary multiplied by 12,000 reexams	Average HAS salary multiplied by 8,000 reexams	Salary multiplied by reexams	Implementation scheduled for January 2014 for May 2014 reexams
	\$181,200 over 3 years	Cost savings of approximately \$120,800 over 3 years.	\$0	
<b><i>CE #2: Staff Time Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	# of potential biennials	# of biennials multiplied by # of hours	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

	12,000 hours per year	8,000 over 3 years	<i>In subsequent MTW Report</i>	
--	-----------------------	--------------------	---------------------------------	--

<b>CE #5: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Rental revenue in dollars (increase).	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	Values forthcoming: total dollars paid by tenant toward rent for all twelve months	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

## **FY2014-6 – Rent Simplification (HCV)**

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan. It is scheduled for implementation in July 2014.

Note that this activity applies only to HCV participants that are **not** part of FY2015-1 MDRC/HUD Rent Study. If a household is selected to participate in the control or treatment group of the Rent Study, they will be subject only to FY2015-1, and not this activity FY2014-6.

Previously, rent calculation was based on 30% of the participant's adjusted monthly income. This activity lowers the percentage used to calculate rent to 27.5% of monthly gross income for all MTW HCV participants and new admissions, and eliminates deductions (i.e., medical and child care) with minimal impact to the participants' rent portion.

The per unit cost will be calculated by the total housing assistance payments divided by the total number of units leased each month. The housing assistance payments expense will be obtained from the monthly financial statements and the total units will be obtained from the Unit Month Report. SAHA will conduct time studies to verify the number of hours that staff spends calculating tenant rent portion. The quality control score will be obtained from an Access database.

### **HUD Standard Metrics**

<b><i>CE #1: Agency Cost Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of task in dollars (decrease).	HAP Expense/Total # of Units = Per Unit Cost	HAP Expense/Total # of Units = Per Unit Cost	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	FY 2012-13 average PUC \$568.43	MTW Funded PUC (2013 \$537.96)	<i>In subsequent MTW Report</i>	
<b><i>CE #2: Staff Time Savings (HCV)</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total time to complete the task in staff hours (decrease).	# of reexams multiplied by average HAS salary multiplied by time to process	# of reexams multiplied by average HAS salary multiplied by time to process	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>
	\$91,500 for all MTW annual reexams	\$46,710 over a 3 year period	<i>In subsequent MTW Report</i>	
<b><i>CE #3: Decrease in Error Rate of Task Execution</i></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average error rate in completing a task as a	Quality Control Monthly Score	Quality Control monthly Score	<i>In subsequent MTW Report</i>	<i>In subsequent MTW Report</i>

percentage (decrease).	89%	95%	<i>In subsequent MTW Report</i>	
------------------------	-----	-----	---------------------------------	--

<b>CE #5: Increase in Agency Rental Revenue</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	<i>Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.</i>

<b>SS #1: Increase in Household Income</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation (in dollars).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	<i>Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.</i>

**SS #3: Increase in Positive Outcomes in Employment Status**

*Report the Baseline, Benchmark and Outcome data for each type of employment status for those head(s) of households affected by the self-sufficiency activity.*

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<b>(6) Other (Heads with any Earned Income)</b>	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.
<b>(6) Other (Heads with any Earned Income)</b>	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral benchmark (no change expected) has been set.

**SS #8: Households Transitioned to Self Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) after implementation of the activity (number).	Actual households transitioned to self sufficiency (Number of households paying full contract rent (no subsidy) for at least 6 months) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Values forthcoming	Values forthcoming	<i>In subsequent MTW Report</i>	Activity is not designed to impact metric; metric is included for MTW standard metric reporting requirements only. Neutral

				benchmark (no change expected) has been set.
--	--	--	--	--

**Hardship Policy**

Households who experience a rent increase of \$26 or more due to the rent simplification calculation will be granted a hardship exemption and have the household’s TTP calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each annual and interim recertification.

## **B. Not Yet Implemented Activities**

SAHA does not have any activities to describe in this category this year.

## **C. Activities On Hold**

### **FY2013-3 Standardize Section 8 and Public Housing Inspection Progress**

This activity is designed to reduce cost and achieve greater cost effectiveness, and was originally approved as part of the FY2012-2013 MTW Plan and implemented in that fiscal year.

This activity unifies Section 8 and Public Housing inspection standards. 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).

This activity is on hold since FY2014, pending results of HUD tests at other PHAs.

## **D. Closed Out Activities**

### **FY2011-1 Block grant funding with full flexibility**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out due to its reference to the MTW Single Fund Flexibility, and not to any additional waivers.

### **FY2011-1a Promote Education through Partnerships**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

### **FY2011-1b Pilot Child Care Program**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The pilot childcare training program ended in the fall of 2011. While the program did have some success in FY2011 in assisting 10 residents in their completion of child care training and certification, there was not enough support for the program to continue.

### **FY2011-1c Holistic Case Management**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

### **FY2011-1d Resident Ambassador Program**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

**FY2011-2 Simplify and streamline HUD approval process for the development, redevelopment, and acquisition of Public Housing**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because faster transaction times have reduced the need for this activity.

**FY2011-3 Biennial reexamination for elderly/disabled (PH)**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because was replaced by new activities FY2014-4 and FY2014-5.

**FY2011-4 Streamline methods of verification for PH and HCV**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by new activity FY2014-1.

**FY2011-5 Requirements for acceptable documents for PH and HCV**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by new activity FY2014-1.

**FY2011-6 Commitment of project-based vouchers (PBV) to SAHA-owned or controlled units with expiring subsidies (HCV)**

This activity was designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is proposed to be closed out because it will be superseded by FY2015-3 upon approval of this MTW Plan.

**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**

This activity was designed to increase housing choices, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is proposed to be closed out because it will be superseded by FY2015-3 upon approval of this MTW Plan.

**FY2011-8      Revise mobility rules for PBV**

This activity was designed to increase cost efficiency, and was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity is proposed to be closed out because it will be superseded by FY2015-3 upon approval of this MTW Plan.

**FY2012-10      Biennial Reexamination for Elderly/Disabled Participants on Fixed Income (HCV)**

This activity was originally approved as part of the FY2011-2012 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by FY2014-4.

**FY2012-11      Local Project Based Voucher Program for Former Public Housing Residents**

This activity was originally approved as part of the FY2011-2012 MTW Plan was closed out before implementation due to discussions with HUD about RAD option.

## V. Sources and Uses of Funds

### V.1. Plan Sources and Uses of MTW Funds

#### A. MTW Plan: Sources and Uses of MTW Funds

##### Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$10,841,806
70600	HUD PHA Operating Grants	\$120,162,089
70610	Capital Grants	\$10,590,711
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$42,827
71600	Gain or Loss on Sale of Capital Assets	(817,336)
71200+71300+71310+71400+71500	Other Income	\$1,577,874
70000	Total Revenue	\$142,397,971

##### Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$14,474,424
91300+91310+92000	Management Fee Expense	\$7,816,879

91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,140,330
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$4,661,240
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$13,636,457
95000 (95100+95200+95300+95500)	Total Protective Services	\$424,208
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$1,464,739
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$1,325,371
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$970,072
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$86,721,912
97400	Depreciation Expense	\$12,441,977
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$145,077,609</b>

MTW Expenses are greater than MTW Revenue for the next fiscal year. This funding shortfall of \$2,679,638 will be covered by drawing existing MTW reserves. Per Board Resolution 5411, in addition to the shortfall, the following items will be funded with MTW reserves:

- \$5 million in funds committed to the Choice Implementation Grant
- \$12.7 million to be used for the Preservation and Expansion of Affordable and Public Housing

The following schedule of Sources and Uses includes all operating costs, other than depreciation, contained in form 50900 above but also provides information related to the board approved capital activities which will require the use of MTW reserves.

<b>Proposed Consolidated Sources and Uses of MTW Funds</b>		
<b>Fiscal Year Ending June 30, 2015</b>		
<b>SOURCES</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
70500 (70300+70400)	Total Tenant Revenue	\$10,841,806
70600	HUD PHA Operating Grants	\$120,162,089
70610	Capital Grants	\$10,590,711
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$42,828
71600	Gain or Loss on Sale of Capital Assets	(\$817,336)
71200+71300+71310+71400+71500	Other Income	\$1,577,873
<b>7000</b>	<b>TOTAL SOURCES</b>	<b>\$142,397,971</b>
<b>USES</b>		
<b>FDS Line Item</b>	<b>FDS Line Item Name</b>	<b>Dollar Amount</b>
<b>Capital &amp; Other Priorities:</b>		
Public Housing Capital Uses		\$12,784,514
	Preservation and Expansion of Affordable Housing approved per resolution 5411):	
	<ul style="list-style-type: none"> <li>• Matching funds the Choice Implementation Grant</li> </ul>	\$5,000,000
	<ul style="list-style-type: none"> <li>• Preserve and Expansion of Affordable and Pubic Housing</li> </ul>	\$12,700,000

<b>Operations:</b>		
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$14,474,424
91300+91310+92000	Management Fee Expense	\$7,816,879
918100	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,140,330
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$4,661,240
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$13,636,457
95000 (95100+95200+95300+95500)	Total Protective Services	\$424,208
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,464,739
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$1,325,371
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$970,072
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$86,721,912
97500+97600+97700+97800	All Other Expenses	\$0
<b>9000</b>	<b>TOTAL USES</b>	<b>\$163,120,146</b>
<b>TRANSFERS, RESERVES &amp; NET POSITION</b>		
MTW Reserve Drawdown		\$20,722,174

## **Activities that Will Use Only MTW Single Fund Flexibility**

### **Education Partnerships**

SAHA's education-related programming is significant and diverse, and includes:

- REACH Awards: recognize and reward nearly 300 students annually for academic achievement
- College Scholarship Program: funds scholarships for up to 50 students annually to provide much needed support to ensure higher educational achievement
- Education Summit: provides up to 900 residents annually with access to education and college resources, financial literacy, and other self-help resources

### **Resident Ambassador Empowerment Program**

The Resident Ambassador Program employs 16 residents throughout the year, providing meaningful work experience for residents. SAHA has found that this program is an effective strategy to engage all residents in educational, training, workforce development, and other self-sufficiency programs.

### **Summer Youth Program**

The Summer Youth Employment Program employs up to 80 resident youth each year, providing work experience and capacity development such as resume writing, banking/financial literacy, interview skills, conflict resolution and other life and workforce development soft skills.

### **Health and Wellness**

SAHA sponsors a variety of events to promote health and wellness, including:

- Golden Gala: much-loved annual event for up to 1,000 elderly and disabled residents
- H2A (Healthy Habits Active) Living Awards: highlight resident involvement and engagement in civic engagement, health, and other quality of life activities
- Annual Father's Day initiative: engages up to 500 families in positive family activities and recognize fathers' contributions through "El Hombre Noble" awards

**V.2.Plan.Local Asset Management Plan**

**B. MTW Plan: Local Asset Management Plan**

Is the PHA allocating costs within statute?

Yes

or

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

or

No

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

or

No

n/a

## VI. 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**

See Appendix 1.

### **B. The beginning and end dates of when the Annual MTW Plan was made available for public review, the dates, locations of public hearings and total number of attendees for the draft Annual MTW Plan, (to ensure PHAs have met the requirements for public participation, HUD reserves the right to request additional information to verify PHAs have complied with all requirements as set forth in the Standard MTW Agreement);**

The 2015 MTW Plan was posted for public comment on May 2, 2014. A variety of opportunities were provided for public comment, including a public hearing on May 15 during the Operations and Choice Neighborhood Committee meeting. One speaker provided comments during the public hearing part of the meeting.

On May 21, MTW staff presented to the quarterly training meeting of the public housing Resident Council. Attendance was around 50.

On May 28, HCV tenants and landlords got together to discuss proposed MTW Plan and Administrative Plan Changes. Attendance was approximately 135.

On June 5, additional public comment was received during the regular Board of Commissioners meeting.

**C. Description of any planned or ongoing PHA-directed evaluations of the demonstration for the overall MTW program or any specific MTW activities, if applicable**

Not applicable.

**D. The Annual Statement/Performance and Evaluation Report (HUD 50075.1) or subsequent form required by HUD for MTW and non-MTW Capital Fund grants for each grant that has unexpended amounts, including estimates for the Plan Year and all three parts of the report;**

See Appendix 2.

## **Appendix 1: Resolutions and Certifications**

SAN ANTONIO HOUSING AUTHORITY

Resolution 5414

**RESOLUTION 5414, AUTHORIZING THE PROPOSED 2014-2015 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), CAPITAL FUND PROGRAM PLAN, AND 5-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN.**

**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") must approve the 2014-2015 Moving to Work (MTW) Agency Plan for fiscal year 2014-2015 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

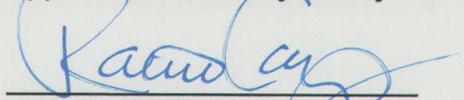
**WHEREAS**, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2014-2015 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

**WHEREAS**, the Board further 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.

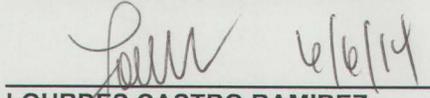
**NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of SAHA hereby:**

- 1) Approves Resolution 5414 authorizing the proposed 2014-2015 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), Capital Fund Program Plan, and 5-year Capital Improvement and Development Plan; and
- 2) Authorizes the Chair and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2014-2015 MTW Plan to HUD.

Approved the 5th day of May 2014.

  
\_\_\_\_\_  
RAMIRO CAVAZOS  
CHAIR, BOARD OF COMMISSIONERS

Attested and approved as to form:

  
\_\_\_\_\_  
LOURDES CASTRO RAMIREZ  
SAHA PRESIDENT AND CEO

**Form 50900: Elements for the Annual MTW Plan and Annual MTW Report**

**Attachment B**

**Certifications of Compliance**

**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, 2014**, 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 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 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.
4. 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.
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 PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its 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.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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.
10. 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.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. 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.

13. 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The 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 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.
16. 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. 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).
20. 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.
21. 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

TX 006

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)

Lourdes Castro Ramirez

Name of Authorized Official

President & CEO

Title



Signature

6/6/14

Date

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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.

**Appendix 2: Annual Statement/Performance and Evaluation  
Report (HUD 50075.1) and Replacement Housing Factor (RHF)  
Plan - 2014/2015**

SAHA plans to combine RHF funds into the MTW block grant and intends to accumulate the RHF grants. See following pages for allocations, schedule, and proportionality test.