



SAN DIEGO  
HOUSING  
COMMISSION

# Moving Forward Moving To Work Program Annual Plan for Fiscal Year 2012

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## SECTION I: INTRODUCTION AND OVERVIEW

### A. INTRODUCTION

The San Diego Housing Commission (SDHC) was established in 1979 to administer the City's various affordable housing programs. The past 32 years have witnessed an increasing need for viable housing solutions as the continual escalation of property values produced a high cost housing market. Through the flexibility offered by the Moving to Work (MTW) demonstration program, SDHC is positioned to address the overwhelming needs of the City's economically disadvantaged population.

Initiatives implemented from past MTW Annual Plans created an opportunity to streamline internal processes resulting in the reduction of administrative costs. Achieving greater cost effectiveness by reducing the administrative burden related to the Housing Choice Voucher program enabled SDHC to allocate additional resources towards new programs and services for Rental Assistance families. The Housing Choice Voucher Homeownership program (known locally as Home of Your Own) and the Choice Communities program made great strides in increasing housing choices for low-income families.

The initiatives contained in the Fiscal Year 2012 MTW Annual Plan take advantage of the flexibilities afforded to SDHC through participation in the MTW demonstration. The Plan creates the foundation for comprehensive rent reform directed toward the work-able population. Although the rent reform model put forth by SDHC includes elements of rent reform models pioneered by existing MTW agencies, SDHC further develops and expounds the concepts to correspond with the characteristics inherent to program participants within SDHC's jurisdiction.

The proposed rent reform model advances the statutory objectives of the MTW demonstration program:

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

SDHC awaits the commencement of Fiscal Year 2012 with enthusiasm as rent reform advances towards the first phases of planning, with full implementation projected for Fiscal Year 2013. Therefore, the upcoming year is critical to laying the foundation for addressing the paradigm shift intrinsic to enacting rent reform and initiating a seamless transition into rent reform, which provides a conduit and appropriate mechanisms to propel low-income families towards self-sufficiency.

### B. GOALS AND OBJECTIVES

SDHC continues to fulfill the three statutory objectives of the MTW demonstration program by meeting the following goals:

- ✓ Designing and implementing a full scale rent reform initiative;



- ✓ Streamlining administrative processes to ensure Federal expenditures are utilized efficiently and effectively;
- ✓ Concentrating on increasing efforts towards promoting self-sufficiency among participants through expansion of inter-agency partnerships and in-house resources;
- ✓ Administering the sponsor-based housing program to provide permanent supportive housing to the City's homeless population; and
- ✓ Acquiring, preserving and/or developing affordable housing units to increase housing choices in San Diego.

Following is a brief summarization of each proposed initiative as a quick point of reference:

1. *Path to Success.* SDHC requests permission to develop and implement a comprehensive rent reform model governed by the three statutory objectives of the MTW demonstration program. The model proposed utilizes a hybrid approach of two proven rent reform structures currently used by other MTW agencies; the model only applies to a Work-Able population defined by SDHC using specific criteria. The model SDHC seeks to employ combines tiered rents with progressive rents into one inclusive model while also eliminating deductions and streamlining allowances. Although the Triennial population is not subject to the progressive rent model, streamlining will be enacted to simplify the reexamination process. Other incentives assisting participants in the Work-Able population to increase income and skills are currently in development. The Achievement Academy and FSS activities will play a key role within the Path to Success initiative.
2. *Biennial Reexamination Schedule.* As a compliment to the Path to Success model, SDHC proposes to implement a biennial reexamination schedule for the Work-Able population. The revised reexamination cycle increases administrative efficiency and increases capacity, thereby achieving greater cost effectiveness. FTEs saved through this initiative will be reallocated to other capacities within the department.
3. *Modify the Full-Time Student Definition.* The full-time student definition will be modified to include only students ages 18 to 23 who are not the head, spouse, or co-head. Household members meeting the revised full-time student definition will receive a 100 percent employment income exclusion. All students, regardless of age or familial status, will be eligible for a graduation incentive wherein proof of graduation can be submitted in exchange for a monetary award and public acknowledgment of their accomplishment.
4. *Project-Based Subsidy Program for the Homeless.* The proposal is to provide rental subsidy to house homeless persons equal to 100 units in the first year, with additional subsidies provided each year to total 500 subsidized units after five years. The subsidy will be flat and based on the number of authorized units in the development; all program administration will be performed by the development owner with monitoring and auditing performed by SDHC.



## MTW INITIATIVE UPDATE

In the Fiscal Year 2010 and Fiscal Year 2011 MTW Annual Plans, SDHC proposed a total of twenty initiatives for implementation beginning July 1, 2009 and July 1, 2010 respectively. Additionally, HUD provided authorization for the creation of an Economic Development Academy (EDA), now known as the Achievement Academy, in Fiscal Year 2009. SDHC would like to take the opportunity to highlight the progress of selected initiatives implemented thus far.

- ✓ The Triennial Reexamination Cycle initiative designed for elderly/disabled households on fixed incomes was implemented effective October 1, 2009 and applied to the February 2010 annual reexamination cycle. There are approximately 4,268 elderly and/or disabled participants currently assigned to the triennial reexamination cycle. The Fiscal Year 2012 MTW Annual Plan modifies the Triennial definition in order to provide greater opportunity for elderly and/or disabled households to qualify for the Triennial cycle.
- ✓ The Choice Communities initiative, a four pronged approach to encourage MTW families to move to low-poverty areas, commenced on January 1, 2010 with the implementation of the Moving for Opportunity, Security Deposit Loan, and 40% Family Share Affordability Cap Elimination components of the initiative. For families choosing to move into one of nine low-poverty areas in San Diego, packets containing information about the Choice Communities are available, along with the opportunity to participate in a Security Deposit Assistance program and a potential waiver of the 40% Affordability Cap. The last and most significant element to the approach, increased payment standards for MTW participants moving to or living within to low-poverty areas, began June 1, 2010.
- ✓ Simplification of the income and asset verification systems was effectively implemented October 1, 2009 and applied to the February 2010 annual reexamination cycle. All interim, move, and intake certifications received or seen on October 1, 2009 and thereafter were processed utilizing the new approach to the verification hierarchy. Annual reexamination forms were revised to reflect the changes. Both staff and participant families have reported on the benefits of this simplification initiative. Asset verification was further streamlined via a Fiscal Year 2011 initiative eliminating retirement accounts as an asset. Staff is no longer required to verify retirement accounts due to the exclusion as an asset. The initiative also encourages participants to obtain retirement accounts as the asset does not impact their annual income and rent portion.
- ✓ A Housing Choice Voucher Homeownership Program, known as the “Home of Your Own” program, was implemented effective October 1, 2009. During implementation, families with an income level conducive to successful homeownership were identified and sent informational flyers outlining the program. SDHC’s website also has information, a pre-qualification checklist, and application for the program. To date, two families have purchased a home using the program as a mechanism for mortgage assistance. Applications continue to be received and processed.
- ✓ The Achievement Academy, formerly known as the Economic Development Academy (EDA), officially opened in SDHC’s main office building in October 2010. The Achievement Academy offers a variety of classes and workshops geared toward workforce preparation, computer skills, and financial skills education. The resources offered at the



academy will be a vital component of Path to Success as program participants work towards increasing income and focusing on self-sufficiency.

- ✓ The Family Self Sufficiency (FSS) program was enhanced by allowing SDHC to enter into a contract of participation agreement with an adult non-head of household. Under this initiative, SDHC created the opportunity to expand the FSS program overall while also extending services to a greater population of participants. Roll out of the changes began in November 2010. Results thus far indicate positive impacts due to the initiative.
  
- ✓ SDHC has selected three sponsors, each of which will use 25 vouchers to house chronically homeless adults. One agency will identify and house 25 of the 100 homeless persons identified as being among the most frequent users of public emergency services. For this program, the United Way and the County of San Diego will provide housing placement and a full array of supportive services. Two agencies will use the remaining 50 vouchers to pay for housing for mentally ill chronically homeless individuals. For these, the County of San Diego will provide housing placement and supportive services through its Full Services Partners funded by California's Mental Health Services Act. Implemented as a pilot program, the approach to addressing issues of persistent homelessness combines supportive services with a housing first model. Intensive case management is also a critical component of the program as participants require comprehensive services to address an array of issues perpetuating homelessness.



## SECTION II: GENERAL SDHC OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

1. Number of public housing units – **75**
2. SDHC does not have any planned significant expenditures for a development exceeding 30% of the Agency’s total budgeted capital expenditures for Fiscal Year 2012.
3. New public housing units – **113**

Development Name	Number of Units	Unit Type	Number of Bedrooms					Accessibility Features	Number of Accessible Units
			1	2	3	4	5+		
Scattered Sites	113	Low-Rise Apartment	0	97	16	0	0	Wheelchair Accessible	20

4. Number of public housing units to be removed – **0**
5. Number of MTW HCV units authorized – **13,898** (This number includes the enhanced vouchers that will be converted to MTW during FY2012, project-based vouchers, and HUD-VASH vouchers as SDHC received a waiver to administer HUD-VASH vouchers as MTW in 2010. Please note: The funding for HUD-VASH vouchers is not part of the MTW Block Grant.)
6. Number of non-MTW HCV units authorized – **133**
7. Number of HCV units to be project-based – **212**

### B. LEASING INFORMATION PLANNED

1. Anticipated total number of MTW PH units leased in Plan year – **188**
2. Anticipated total number of non-MTW PH units leased in Plan year – **0**
3. Anticipated total number of MTW HCV units leased in Plan year – **13,898** (This number includes the enhanced vouchers that will be converted to MTW during FY2012, project-based vouchers, and HUD-VASH vouchers as SDHC received a waiver to administer HUD-VASH vouchers as MTW in 2010. Please note: The funding for HUD-VASH vouchers is not part of the MTW Block Grant.)
4. Anticipated total number of non-MTW HCV units leased in Plan year – **133**
5. SDHC historically has maintained a near 100% lease up rate in its programs. Due to the housing crisis in San Diego, it is not expected there will be any potential difficulties in leasing public housing or Housing Choice Voucher units.
6. Optional: Number of project-based vouchers at start of plan year – **212**



### **C. WAITING LIST INFORMATION**

SDHC will continue to have community wide waiting lists for the Housing Choice Voucher (HCV) and public housing programs. Project-based developments designated as supportive service providers will maintain their own individual waiting lists to match their target population.

The HCV waiting list is currently open and grew from 45,231 in 2010 to a current total of 52,195. The public housing waiting list is currently open with 15,860 individuals and families listed as active.

A waiting list purge for both lists will be completed by the end of Fiscal Year 2012.



### **SECTION III – NON-MTW RELATED HOUSING AUTHORITY INFORMATION (OPTIONAL)**

A. List planned sources and uses of other HUD or of Federal Funds-exclude HOPE VI – N/A

B. Description of non-MTW activities –

On May 27, 2010 SDHC received regulatory and statutory waivers from the Housing Voucher Management and Operations Division of HUD for administration of the HUD-VASH Voucher Program. These waivers allow SDHC to administer the HUD-VASH Vouchers it receives mirroring the administration of the MTW vouchers with one minor stipulation. SDHC has transitioned all current HUD-VASH Voucher program participants, and all new participants are administered by MTW standards. The HUD-VASH Voucher funding is not included as part of the MTW Block Grant; these funds are received and tracked separately from MTW funds.



## SECTION IV – LONG-TERM MTW PLAN (OPTIONAL)

Over the last two years, SDHC outlined a long-term vision for MTW describing its planned focus on the following objectives:

- Attain new affordable units within the city;
- Enhance and further streamline the HCV and public housing programs; and
- Provide new housing solutions for the City's homeless population.

These objectives will be carried through to future plans and initiatives as these issues are of the utmost importance to SDHC and to the city of San Diego. In this community, affordable housing units are in high demand but short supply, and SDHC intends to continue to add family units to its affordable housing portfolio over the next several years, drawing on MTW funds along with other funding sources to use the current market conditions to its advantage.

HUD has bestowed upon the MTW program three major objectives:

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

SDHC recognizes that in order to take full advantage of the flexibilities afforded as an MTW Demonstration Agency and accomplish its own objectives in conjunction with the three MTW objectives, a major innovation is needed.

Therefore, over the next several years SDHC will embark on a journey of change. The Rental Assistance programs will undertake a major rent reform initiative, Path to Success, designed to encourage families to attain the goals of increasing income, completing education, and becoming more economically self-sufficient. This program renovation will also streamline the rent calculation and program administration processes. The goal of this endeavor is to use Federal dollars more efficiently and sensibly while using the cost savings to provide assistance to additional low-income families and increase understanding of the Rental Assistance program among participants. Path to Success will also enhance customer service, fund aspects of the program that will increase services to those families to put them on the track to self-sufficiency and other activities related to MTW and SDHC's long-term objectives.

Relating to SDHC's third objective, the City's homeless population needs attention: more housing solutions and services to support the transition from homeless to "at home". The Sponsor-Based Homeless Voucher initiative will, at the conclusion of its development and implementation, provide 100 homeless persons with a stable, safe living space and access to many supportive services to facilitate successful outcomes. One new activity contained in this Fiscal Year 2012 Annual Plan outlines a proposal to utilize MTW flexibility to fund a project-based subsidy program for the homeless as part of an innovative approach to moving closer to ending homelessness in San Diego.



It is both with anticipation and an acknowledgement of the considerable efforts ahead that SDHC looks forward to the next eight years of its MTW Demonstration participation. The authority provided under MTW allows this agency to restructure and design programs specifically targeted toward our local community needs, and we move forward with the intent to use this authority to improve the lives of our low-income families.



## SECTION V – PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

Proposed MTW Activities			
Proposed MTW Activity	Statutory Objective		
	Reduce Cost and Achieve Greater Cost Effectiveness	Encourage Self-Sufficiency	Increase Housing Choices
Fiscal Year 2012 (July 1, 2011 to June 30, 2012)			
1. Path to Success	X	X	
2. Biennial Reexamination Schedule	X		
3. Modify Full-Time Student Definition	X	X	
4. Project-Based Subsidy Program	X		X

### 1. PATH TO SUCCESS: RENT REFORM MODEL

SDHC seeks authority to implement major rent reform in January 2013. The rent reform model is entitled Path to Success as this title captures the objective of the initiative. Path to Success has been crafted with significant consideration to our current program participants and considerable research and analysis of data pertaining to their current conditions. The initiative also fits the needs of the community served by SDHC and takes into account the high rental market inherent to residing in San Diego. SDHC is confident that Path to Success will result in a higher level of personal responsibility and greater accountability of program participants by encouraging self-sufficiency, while utilizing Federal expenditures in a more cost effective manner allowing for the acquisition/preservation of additional affordable housing units and assisting additional low-income families over the long-term.

The rent reform model proposed by SDHC utilizes two components working in tandem as one dynamic system: tiered rents and progressive rents. Additional features of Path to Success include a minimum rent based on the number of Work-Able adults residing in the household, aligning the application of the utility allowance with the application of the payment standard by using the smaller of the voucher or unit size, and the elimination of the utility reimbursement. All other deductions and allowances will be eliminated with the exception of the child care and medical expense deductions. The child care deduction will continue to be administered under current regulations while the medical expense deduction will be streamlined into standard bands. Disability assistance expenses will fold into the standardized medical expense bands as a further streamlining measure. Households receiving the Earned Income Disallowance (EID) at implementation will continue to receive the deduction until the EID term is satisfied. No new families will be enrolled in EID upon implementation of Path to Success.

Minimum rents were set using factors including the current California minimum wage rate, a minimum number of weekly work hours a household could reasonably expect to work, as well as the rates of other benefits most often received by program participants. The increases in minimum rent over time coincide with the expectation households will begin to work and/or increase work hours or income as a result of utilizing the features of the Achievement Academy. Most aspects of



the model motivate self-sufficiency given that participants determined to be “Work-Able” will be expected to pay an increasing portion of rent over time while receiving the necessary supportive services to expand household income.

As part of Path to Success, the current Elderly/Disabled Triennial population will be revised to dictate the characteristics of the Work-Able populations. It is proposed the Triennial population will include families where 100 percent of adults are elderly and/or disabled, with elderly being defined as 55 or older for this purpose only. In short, the Work-Able population is comprised of all households not meeting the Triennial population criteria. SDHC recognizes there may be subpopulations within the Work-Able population who may have difficulty adhering to the requirements of Path to Success and has made provisions for these households in the form of hardship policies.

All households identified as Triennial will continue on the three-year reexamination schedule already in place. The elimination of allowances and deductions applies to Triennial households in the same manner the changes will be applied to Work-Able households. The Total Tenant Payment (TTP) may be dropped to 28.5 percent with a minimum rent of \$0 to ensure Triennial families are minimally impacted by the changes proposed under Path to Success. Please note that the HUD VASH program participants will not be included in the Path to Success model at this point. SDHC plans to collaborate with the Veteran’s Administration staff to create an initiative in a future MTW Plan that best serve the needs of this unique population.

SDHC recognizes significant efforts must be exercised in order to prepare the Work-Able households for the upcoming rent reform activities. Once SDHC receives approval to proceed with Path to Success, staff will begin the process of individually engaging participants to provide education about the immediate and future impact of Path to Success and connecting households with the necessary services to begin building the skills essential to obtaining employment and/or increasing income.

The Achievement Academy will play a pivotal role in readying households for the pending transition into Path to Success by providing ongoing resources through its ever-growing list of programs and partnerships. The Achievement Academy is a 9,600 square foot learning center dedicated solely for Rental Assistance participants that offers classroom-style workshops to assist participants with sharpening job skills, enhancing workforce marketability, increasing income levels, and beginning the journey towards obtaining self-sufficiency. SDHC currently has partnerships with the San Diego Workforce Partnership, the THRIVE initiative, and Juma Ventures who provide full-time staff and employment training and placement support at the Achievement Academy. Additionally, SDHC secured a contract with a full-time income support specialist that is dedicated to procuring employment opportunities for program participants. Recently conducted research predicts substantial job growth in San Diego to coincide with the implementation of Path to Success, thus the contracted services of a job placement professional not only compliments the ambitions of Path to Success but generates confidence towards the ability of our participants to obtain viable, long-term employment.



The proposed Work-Able rent reform model may contain the following elements:

<b>Key Concept Parameters</b>	<b>Years 1-2</b>	<b>Years 3-4</b>	<b>Year 5+</b>
Tiered rent calculation TTP%	29.0%	30.0%	31.0%
Minimum rent: 1 work-able member	\$100	\$200	\$300
Minimum rent: 2 work-able members	\$200	\$350	\$500
Rent portion increase cap (initial hardship policy)	\$100	No	No
Comprehensive hardship policy	Yes	Yes	Yes
Remove utility reimbursement	Yes	Yes	Yes
Remove deductions	Yes	Yes	Yes
Medical deduction	Bands of \$2500	Bands of \$2500	Bands of \$2500
Childcare deduction	No change	No change	No change
Recertification schedule	Biennial	Biennial	Biennial

The proposed Triennial model may contain the following elements:

<b>Key Concept Parameters</b>	<b>Years 1+</b>
Standard rent calculation TTP%	28.5%
Minimum rent	\$0
Comprehensive hardship policy	Yes
Remove utility reimbursement	Yes
Remove deductions	Yes
Medical deduction	Bands of \$2500
Childcare deduction	No change
Recertification schedule	Triennial

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures. Provide incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

**Anticipated Impact and Impact Analysis:** In order to facilitate a transition period for the Work-Able families, the Total Tenant Payment (TTP) may fall to 29 percent in the first phase, resulting in a decreased rent portion for 65 percent of Work-Able families. Of the remaining Work-Able families, it is tentatively proposed that no rent portion will increase more than \$100 as a direct result of the transition to the Path to Success system, a temporary measure to help ease the conversion process. SDHC may modify the implementation and/or administration of the rent cap depending on funding levels. Sixty-nine percent of Triennial families will also see a rent portion decrease as the TTP drops to 28.5 percent. SDHC has further analyzed the household attributes for the families it projects will see a rent portion increase and used this information when constructing the Path to Success hardship policies, detailed later in this initiative.

SDHC also anticipates long-term cost savings related to the measures contained in the proposed Path to Success model. More specifically, adoption of a biennial reexamination schedule (a separate activity contained in this Plan) and hard minimum rents are expected to generate the majority of the savings. The long-term cost savings cannot be definitively predicted due to



fluctuations in household income, changes in utility allowance and payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding. However, SDHC can predict Housing Assistance Payments (HAP) increases in the first phase of implementation with HAP decreases projected for the remaining two phases of Path to Success. The HAP increases occurring in the first phase of Path to Success result from the TTP reduced to a level which is below cost-neutral. The second and third phase cost savings are generated from higher minimum rents and the progressive increases in TTP. The cost savings produced in the final phases of Path to Success will be measured by the additional number of families SDHC is able to serve by issuing additional vouchers beyond the agency’s allocation, creating local housing programs, or housing low-income families in affordable units acquired in whole or in part with the HAP savings.

Path to Success is proposed to be implemented for both the HCV program participants and PH tenants beginning January 2013. Due to recent funding uncertainty, SDHC will be closely monitoring HCV and PH funding levels in relation to Path to Success over the course of the next several years. There are many moving parts in this rent reform initiative, and SDHC will perform ongoing analysis based on actual funding, costs, and participant impact. Should analysis show that aspects of the proposal are no longer feasible due to changes in funding levels, changes may be made, particularly in the TTP percentage section and implementation timeline. Moreover, SDHC may phase in some components prior to January 2013, such as the utility allowance logic, in order to ease the transition and reduce agency costs.

The summary impact analysis is illustrated in the chart below:

<b>WORK-ABLE POPULATION</b>	<b>7,098</b>				
	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
% HHs Rent Decrease	65%	65%	44%	44%	27%
% HHs Rent Increase	35%	35%	55%	55%	73%
Average HH Shelter Burden	26%	26%	30%	30%	34%
<b>TRIENNIAL POPULATION</b>	<b>6,527</b>				
	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
% HHs Rent Decrease	69%	69%	69%	69%	69%
% HHs Rent Increase	31%	31%	31%	31%	31%
HH Shelter Burden* Change	28%	28%	28%	28%	28%

**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Annual number of Work-Able families is 7,098
- Annual number of Work-Able families with earned wages is 4,428 or 62% of total Work-Able households
- Annual number of families paying the progressive minimum rents is 0
- Average annual income of Work-Able families is \$18,907
- Annual number of families served by SDHC’s MTW HCV program is 13,627
- Total number of affordable units owned by SDHC or SDHC’s LLCs, purchased wholly or in part with MTW funds after implementation of Path to Success is 0
- Annual number of Path to Success hardship exceptions granted is 0



- Annual number of participants exiting the Path to Success program due to achieving self-sufficiency is 0
- Number of families participating in Path to Success terminated from the program due to lease violations involving the failure to pay rent is 0

*Benchmarks:*

- Average annual income of Work-Able families will increase to \$20,798 (by 10 percent) by June 30, 2017
- Annual number of Work-Able families with earned wages will increase to 70 percent by June 30, 2017
- Annual number of families paying the progressive minimum rents will be less than 10 percent by June 30, 2015
- Annual number of families served by SDHC's MTW HCV program will be 13,727 by June 30, 2017
- Total number of affordable units owned by SDHC or SDHC's LLCs, purchased wholly or in part with MTW funds after implementation of Path to Success will be 20 by June 30, 2017
- Annual number of participants exiting the Path to Success program due to achieving self-sufficiency will be 120 by June 30, 2017
- Annual number of Path to Success hardship exceptions granted will be less than 150 by June 30, 2015
- Number of families participating in Path to Success terminated from the program due to lease violations involving the failure to pay rent will be less than 50 by June 30, 2017

*Metrics:*

- Annual number of Work-Able families
- Annual number of Work-Able families with earned wages
- Annual number of families paying the progressive minimum rents
- Average annual income of Work-Able families
- Annual number of participants exiting the Path to Success program due to achieving self-sufficiency
- Annual number of families served by SDHC's MTW HCV program
- Total number of affordable units owned by SDHC or SDHC's LLCs, purchased wholly or in part with MTW funds after implementation of Path to Success
- Annual number of Path to Success hardship exceptions granted
- Number of families participating in Path to Success terminated from the program due to lease violations involving the failure to pay rent

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter to date and year to date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



Path to Success								
Metric	Baseline 2011	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of Work-Able families	7,098					N/A		
Annual number of Work-Able families with earned wages	4,428					Increase to 4,968 (70% of Work-Able families)	June 30, 2015	
Annual number of families paying the progressive minimum rents	0					<10%	June 30, 2017	
Average annual income of Work-Able families	\$18,907					Increase to \$20,798 (10% increase)	June 30, 2017	
Annual number of families exiting the Path to Success program due to achieving self-sufficiency	0					120	June 30, 2017	
Annual number of families served by SDHC's MTW HCV program	13,627					13,727	June 30, 2017	
Total number of affordable units owned by SDHC or SDHC's LLCs, purchased wholly or in part with MTW funds after implementation of Path to Success	0					20	June 30, 2017	
Annual number of Path to Success hardship exceptions granted	0					<150 annually	June 30, 2015	
Potential Undesirable Outcomes								
Metric	Baseline 2011	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Acceptable Level	Action Items
Number of families participating in Path to Success terminated from the program due to lease violations involving the failure to pay rent	0					N/A	<50	



**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section C (4) containing waivers of Section 3 (a) (1) and 3 (a) (2) of the U.S. Housing Act of 1937 and 24 CFR 966.4 and 960.257; Section C (11) containing waivers of Section 3 (a) (2), 3 (a) (3) (A), and 6 (l) of the U.S. Housing Act of 1937 and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, 960.255, and 966 Subpart A; Section D (1) (c) containing waivers of Section 8 (o) (5) of the U.S. Housing Act of 1937 and 24 CFR 982.516; Section D (2) (a) containing waivers of Sections 8 (o) (1), 8 (o) (2), 8 (o) (3), 8 (o) (10), and 8 (o) (13) (H-I) of the U.S. Housing Act of 1937 and 24 CFR 982.508, 982.503, and 982.518.

#### *Potential Undesirable Outcomes*

Path to Success was designed to increase a household's rent portion *after* the first two years of implementation to prevent a hardship to families and give the Work-Able households extra time to engage in skill development activities, complete their education, and build income levels before incremental increases in the rent portion are enacted. SDHC identified subpopulations who may fit the description of a Work-Able household, but due to other factors may have difficulty increasing income accordingly in order to pay the rent. Hardship policies are available for these households. SDHC does anticipate a small number of households not contained in the subpopulations will have lease violations due to failure to pay rent and may be terminated from the program. SDHC will make every attempt to provide the necessary resources and education about Path to Success prior to implementation to prevent terminations due to inability to pay rent.

#### *Hardship Policy*

SDHC constructed hardship policies for subpopulations identified as requiring consideration of their respective situations which may prohibit growing income to match the Path to Success requirement to pay a higher rent portion over time to encourage self-sufficiency. The hardship policies will be applied on a case-by-case basis. The appropriate language surrounding the hardship policy will be contained in the Administrative Plan, and procedures will be drafted to ensure consistent application of the hardship policies. As an additional safety net, SDHC is also considering extending the time period a family remains at zero HAP before the voucher is terminated.

As part of the undesirable outcomes, SDHC recognizes that instituting minimum rents and changing the TTP percentages in progressive steps may impact some families to a greater degree than others. In response, the following hardship policies have been developed.

Shelter Burden Exemption: The family, whether Work-Able or Triennial, must request the hardship exemption in writing. Requirements for consideration are as follows:

- Family's shelter burden must be greater than the acceptable level as calculated by SDHC.
- The family must either be Triennial or consist of a single caregiver with one or more dependents.
- Gross income before exclusions will be considered.
- Family must sign a document consenting to participate in required self-sufficiency activities, which may include classes/workshops, applying for benefits, etcetera.

SDHC will appoint an internal Hardship Review Committee which will review and make determinations on all hardship requests. Hardship exemptions will be temporary. During the



hardship exemption period, the family's monthly rent portion will be reduced to an acceptable rent burden percentage, such as 45 percent of monthly income for Work-Able families and 40 percent for Triennial families. All families who are approved for the hardship exemption will be transferred to a designated caseworker who will work with them and serve as the nexus between the families and the Achievement Academy services. The purpose of this caseworker will be to assist the families in regaining employment and/or receiving benefits for which they qualify.

**Hardship for zero income:** Any family, regardless of group or make up, when income is reduced to zero will have a zero rent portion with no utility reimbursement if the loss is through no fault of their own. The exemption will have a duration of six months maximum (eligible to reapply after two years), after which time their rent portion will default to the applicable minimum rent. Work-Able zero income families will be required to sign a document consenting to participate in required self-sufficiency activities, which may include classes/workshops, applying for benefits, etcetera and will be transferred to a designated caseworker who will work with them and serve as the nexus between the families and the Achievement Academy services. The purpose of this caseworker will be to assist the families in regaining employment and/or receiving benefits for which they qualify. At this point the exemption ceases and the family will be responsible to pay their true rent portion or the minimum rent for the household, whichever is higher.

**Hardship for medical expenses:** In order to accommodate elderly/disabled families with extremely high medical expenses, a fourth medical band has been established. Families with medical expenses of \$10,000 or more will receive a medical deduction in the actual amount of qualified medical expenses.

As a final hardship policy, SDHC will consider special situations on a case-by-case basis for admission to the Triennial population. The Hardship Review Committee will make a recommendation to the Vice President of Rental Assistance, or designee, who will have final approval in such extraordinary circumstances.

SDHC is in the process of continuing to vet Path to Success, including hardship policies, with various stakeholders and community groups. There are other variables that are difficult to predict, such as future economic conditions, administration costs, and funding levels. As implementation will not occur until January 2013, changes may be made to the structure or policies based on feedback and/or other mitigating factors. Though not anticipated, if significant changes are made to policy, additional impact analysis will be conducted and included in future MTW Annual Plans and Reports.

## **2. BIENNIAL REEXAMINATION SCHEDULE**

In order to coincide with the two years comprising each stage of the progressive rent schedule as contained in the Path to Success initiative, SDHC proposes to place all Work-Able households on a biennial reexamination schedule. Reducing the frequency of full reexaminations increases administrative efficiency and generates cost savings related to personnel. The initiative will also benefit households since any increase in income will not be captured until the second year of the cycle; families will have additional time to build savings accounts, increase skill levels to become more marketable, complete secondary education or job training programs, or obtain employment. To correspond with the biennial reexamination schedule, any changes in payment or subsidy standards and/or voucher size will be applied at the next recertification. Please note in relation



to portability: Households will remain on an annual reexamination cycle if SDHC is administering the voucher.

Since SDHC is requesting to modify the annual reexamination schedule to a biennial reexamination schedule for those in the Work-Able population to coincide with the Path to Success initiative, authorization for release of information forms must be extended to encompass a larger timeframe in which SDHC can access information with written authorization from participants. The Federally mandated HUD-9886 Authorization for Release of Information form only allows PHAs to access income information for 15 months from the date of the signature on the form. SDHC is requesting permission to create an agency authorization form conferring the client's authorization to extend the use of the HUD-9886 for an additional 24 months (a total of 39 months) from the date of the signature. The additional 24 months accommodates the population of participants currently on the triennial reexamination schedule as well as the new proposed biennial reexamination schedule.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Anticipated Impact:** SDHC expects the biennial reexamination schedule will save approximately five FTEs, therefore achieving greater cost effectiveness in Federal expenditures. The saved FTEs may be reallocated within the Rental Assistance Department to various capacities, including but not limited to self-sufficiency and Achievement Academy activities, hardship mitigation, program integrity activities, and/or reception.

**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Occupancy FTE saved due to the reduction of full reexaminations is 0
- Annual number of full reexaminations conducted for Work-Able families on the biennial reexamination schedule is 0
- Annual staff hours required to process full reexaminations is 31,465
- Annual cost of printing, copying, and mailing full reexamination packets is \$17,267

*Benchmarks:*

- Occupancy FTE saved due to the reduction of full reexaminations will be 5 by June 30, 2015
- Annual number of full reexaminations conducted for Work-Able families on the biennial reexamination schedule will be < 4,000 by June 30, 2015
- Annual staff hours required to process full reexaminations will be <13,120 by June 30, 2015
- Annual cost of printing, copying, and mailing full reexaminations packets will be <\$7,200 by June 30, 2011

*Metrics:*

- Annual number of full reexaminations conducted for Work-Able families on the biennial reexamination schedule
- Occupancy FTE saved due to the reduction of full reexaminations
- Annual staff hours required to process full reexaminations
- Annual cost of printing, copying, and mailing full reexamination packets



**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter to date and year to date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Biennial Reexamination Schedule								
Metric	Baseline 2011	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Occupancy FTE saved due to reduction of full reexaminations	0					5	June 30, 2015	
Annual number of full reexaminations conducted for Work-Able families on the biennial reexamination schedule	0					<4,000	June 30, 2015	
Annual staff hours required to process full reexaminations	\$31,465					<13,120	June 30, 2015	
Annual cost of printing, copying, and mailing full reexamination packets	\$17,267					<\$7,200	June 30, 2015	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section C (4) containing waivers of Section 3 (a) (1) and 3 (a) (2) of the U.S. Housing Act of 1937 and 24 CFR 966.4 and 960.257; Section C (11) containing waivers of Section 3 (a) (2), 3 (a) (3) (A), and 6 (l) of the U.S. Housing Act of 1937 and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, 960.255, and 966 Subpart A; Section D (1) (c) containing waivers of Section 8 (o) (5) of the U.S. Housing Act of 1937 and 24 CFR 982.516; Section D (2) (a) containing waivers of Sections 8 (o) (1), 8 (o) (2), 8 (o) (3), 8 (o) (10), and 8 (o) (13) (H-I) of the U.S. Housing Act of 1937 and 24 CFR 982.508, 982.503, and 982.518.

**Impact Analysis and Hardship Policy:** SDHC conducted an impact analysis to determine the potential for adverse effects on participants. As the analysis concludes no negative effects due to the activity, a hardship policy has not been designed for this initiative. However, participants can apply for a hardship exemption under the Path to Success initiative in which the biennial reexamination schedule is an integral component. The hardship policy is comprehensive and covers potential undesirable outcomes resulting from the rent reform activities contained in the Fiscal Year 2012 MTW Plan.



### 3. MODIFY THE ADMINISTRATION OF THE FULL-TIME STUDENT DEFINITION

To further encourage self-sufficiency among participants and streamline administrative processes, SDHC proposes to modify the administration of the full-time student deduction by excluding 100 percent of the full-time student's earned income. Thus, the elimination of the \$480 dependent deduction as described in the Path to Success initiative will not negatively impact the family's rent portion. The timeframe in which a participant can take advantage of the full-time student deduction will be redefined to include adults within a household (excluding the head, spouse, and co-head) who are ages 18 to 23.

SDHC plans to partially implement the initiative in September 2011 effective with January 2012 annual reexaminations. SDHC will implement the elimination of the \$480 deduction and exclusion of 100 percent of income when Path to Success formally implements in January 2013 with all other facets of the modified full-time student deduction beginning September 2011.

An incentive extended to all students receiving their degree or certificate of completion is eligibility to receive a monetary award upon providing proof of graduation. Eligibility to receive the award is not limited to students ages 18 to 23; any adult household member including the head, spouse, or co-head is eligible for the award. A program participant may receive only one award for acquiring a degree, diploma, or certificate of completion per lifetime.

Targeting the full-time student deduction to adult participants (excluding the head, spouse, and co-head) ages 18 to 23 provides an incentive to participants to complete school and enter the workforce in a timely manner with a greater skill set acquired in early adulthood. Allowing a time span of six years for students to complete their education allows for additional time in the event the standard degree/certificate cannot be achieved within four years, such as the student decides to pursue an alternate degree/certificate or the student wishes to pursue a higher degree.

SDHC further proposes to modify the regulations pertaining to the student rule and eliminate the requirement to apply the amount of financial assistance in excess of tuition toward the rent calculation. The regulations state only applicants and participants over the age of 23 with dependent children are exempt from having financial aid considered for the purposes of the rent portion calculation. To further complement Path to Success, SDHC requests to exclude financial aid from the income calculation in all circumstances. The student rule surrounding the determination of programmatic eligibility for applicants still applies per the current Federal regulations and Public Law.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures. Provide incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self sufficient.

**Anticipated Impact and Impact Analysis:** SDHC anticipates an increased number of participants ages 18 to 23 will enroll as full-time students and maintain their full-time status in order to take advantage of the full-time student deduction. SDHC also expects the monetary award will motivate adult household members to complete their education or vocational training even if not eligible for the income exclusion.



The total amount of excluded annual income for all full-time students is \$4,427,627: \$2,832,195 excluded for students ages 18 to 23 and \$1,595,432 excluded for students ages 24 and over which represents a HAP savings of approximately \$478,630. The savings increases to \$506,710 when factoring in the elimination of the \$480 dependent deduction. The saved HAP dollars will be used to fund the award program, provide possible future incentives for full-time students over the age of 23 and other self-sufficiency activities. MTW Block Grant fungibility may be used to fund the award program if additional monies are necessary, subject to funding availability.

SDHC also expects to save staff time since staff will no longer be verifying the student status of participants ages 24 and over. The hours saved verifying the status of students in this age bracket will be used towards the increased self-sufficiency activities connected with Path to Success.

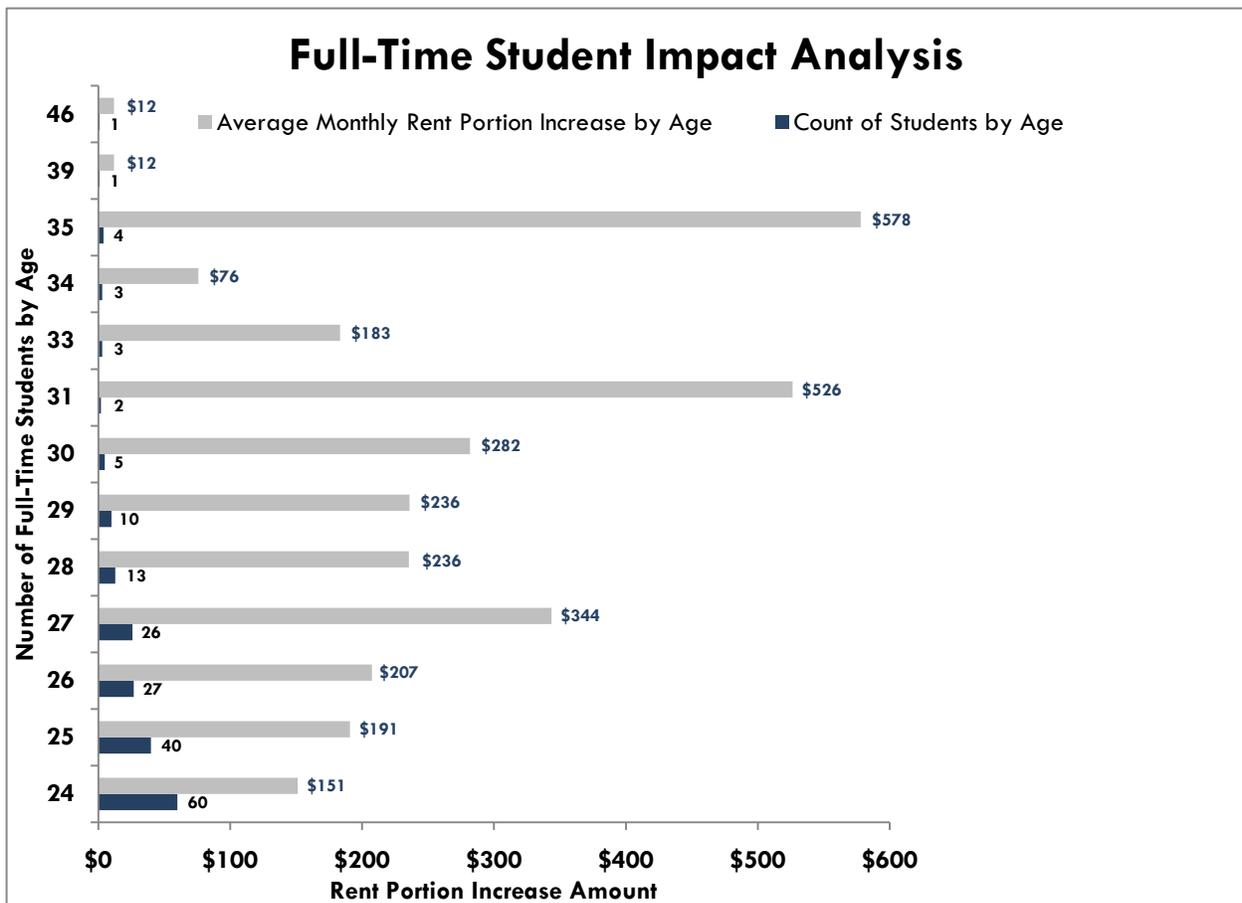
The summary impact analysis chart below illustrates the anticipated HAP impact resulting from the initiative:

Impact Analysis						
Age	Count of Students by Age	Total Earned Income Exclusions	Total Earned Income Exclusion Plus Dependent Deduction	Total Annual TTP Increase/HAP Savings	Average Annual Increase/Household	Average Monthly Increase/Household
24	60	\$333,846	\$362,646	\$108,794	\$1,813	\$151
25	40	\$286,109	\$305,309	\$91,593	\$2,290	\$191
26	27	\$210,988	\$223,948	\$67,184	\$2,488	\$207
27	26	\$344,807	\$357,287	\$107,186	\$4,123	\$344
28	13	\$116,248	\$122,488	\$36,747	\$2,827	\$236
29	10	\$89,547	\$94,347	\$28,304	\$2,830	\$236
30	5	\$53,948	\$56,348	\$16,904	\$3,381	\$282
31	2	\$41,149	\$42,109	\$12,633	\$6,316	\$526
33	3	\$20,558	\$21,998	\$6,599	\$2,200	\$183
34	3	\$7,680	\$9,120	\$2,736	\$912	\$76
35	4	\$90,552	\$92,472	\$27,742	\$6,935	\$578
39	1	\$0	\$480	\$144	\$144	\$12
46	1	\$0	\$480	\$144	\$144	\$12
<b>Grand Total:</b>	<b>195</b>	<b>\$1,595,432</b>	<b>\$1,689,032</b>	<b>\$506,710</b>	<b>\$2,599</b>	<b>\$217</b>



The impact analysis conducted by SDHC indicates approximately 195 or 13% of total verified students will no longer be eligible for full-time student status under this initiative. Of these 195 students, \$1.6 million of currently excluded income will be used to calculate the household’s rent portion when the initiative is implemented. SDHC is using a phase-in approach when implementing the initiative and since the income is present to support the increase in rent portion, SDHC does not anticipate negative impacts on households when the rent portion is re-calculated.

The summary impact analysis chart further illustrates the anticipated HAP increases proportioned by age and the average monthly rent portion increase:



**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Annual number of verified full-time students is 1,510
- Annual number of verified full-time students ages 18 to 23 is 1,315
- Annual number of verified full-time students ages 24 and over is 195
- Annual number of hours to verify the full-time student status of participants ages 18 to 23 is 329 (0.25 hours times 1,315)
- Annual number of hours to verify the full-time student status of participants ages 24 and over is 49 (0.25 hours times 195)



- Annual number of graduation awards distributed is 0
- Annual amount of excluded income of all verified full-time students is \$4,427,627

*Benchmarks:*

- Annual number of verified full-time students will be 1,610 by June 30, 2013
- Annual number of verified full-time students ages 18 to 23 will be 1,415 by June 30, 2015
- Annual number of verified full-time students ages 24 and over will be 0 by June 30, 2013
- Annual number of hours to verify the full-time student status of participants ages 18 to 23 will be at least 400 by June 30, 2013
- Annual number of hours to verify the full-time student status of participants ages 24 and over will be 0 by June 30, 2013
- Annual number of graduation awards distributed will be 25 by June 30, 2013

*Metrics:*

- Annual number of verified full-time students
- Annual number of verified full-time students ages 18 to 23
- Annual number of verified full-time students ages 24 and over
- Annual number of hours to verify the full-time student status of participants ages 18 to 23
- Annual number of hours to verify the full-time student status of participants ages 24 and over
- Annual number of graduation awards distributed
- Annual amount of excluded income of all verified full-time students

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter to date and year to date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



Modify the Full Time Student Definition								
Metric	Baseline 2011	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of verified full-time students	1,510					1,610	6/30/2013	
Annual number of verified full-time students ages 18 to 23	1,315					1,415	6/30/2015	
Annual number of verified full-time students ages 24 and over	195					0	6/30/2013	
Annual number of hours to verify the full-time student status of participants ages 18 to 23	329					400	6/30/2013	
Annual number of hours to verify the full-time student status of participants ages 24 and over	49					0	6/30/2013	
Annual number of graduation awards distributed	0					25	6/30/2013	
Annual amount of excluded income of all verified full-time students	\$4,427,627					N/A	N/A	



**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section C (11) containing waivers of Section 3 (a) (2), 3 (a) (3) (A), and 6 (l) of the U.S. Housing Act of 1937 and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, 960.255, and 966 Subpart A; Section D (2) (a) containing waivers of Sections 8 (o) (1), 8 (o) (2), 8 (o) (3), 8 (o) (10), and 8 (o) (13) (H-I) of the U.S. Housing Act of 1937 and 24 CFR 982.508, 982.503, and 982.518; Section D (3) (a) containing waivers of Section 16 (b) and 8 (o) (4) of the U.S. Housing Act of 1937 and 24 CFR 5.603, 5.609, 5.611, 5.628, and 982.201.

*Potential Undesirable Outcomes:*

Modifying the full-time student deduction will result in an increase in the rent portion if the household contains a full-time student ages 24 and older where employment income was previously excluded. Although the household will experience the rent portion increase, impact to the family should be minimal as there is income supporting the higher rent portion.

*Hardship Policy:*

SDHC will send written notification to all households impacted or potentially impacted by the modification to the administration of the full-time student employment income exclusion. The notification will advise each household the exclusion of employment wages is no longer applied to full-time students ages 24 and over. The notice will further explain the graduation incentive available to all adult household members. As a hardship policy, the elimination of the exclusion will be phased in over the course of two years. Households with full-time students immediately affected by the modification will continue to receive an employment income exclusion of 50 percent at the first annual reexamination occurring after implementation and then drop to 0 percent at the next annual/biennial reexamination. Any family with a full-time student beginning program participation after the change has been implemented will not receive this phase-in.

#### **4. PROJECT-BASED SUBSIDY PROGRAM FOR THE HOMELESS**

SDHC requests authorization to craft a local housing program to assist the homeless. The agency proposes to create a program to provide rental subsidy to project development owners to house up to 100 homeless persons or families in the first year of operation, with a target of subsidy up to 500 units at the end of a five-year time period. The subsidy will be flat, determined for each complex using factors such as the Fair Market Rents, amenities, and the tenants' projected average income levels. It will also be based on the number of units authorized in the development. As the income levels of the homeless are generally very low, an income calculation for the tenants may not be conducted, however, the project owner will be required to certify that the tenants are homeless and at or below the very low-income level. The project owner will be charged with setting appropriate rents, subject to rent reasonableness, in order to provide housing to the homeless. The project owner will be required to maintain an 85 percent occupancy rate to receive the subsidy.

SDHC will publish a Request for Qualifications to select project owners for this program. If this process does not solicit an adequate response, SDHC will select owners based on a non-competitive process.

*Monitoring:*

Program administration will be conducted by the project owner with monitoring performed by SDHC. The project owner will be required to certify that all families admitted to the program/development are homeless and meet the definition of low-income. They will be required



to submit a program plan for SDHC approval including waiting list criteria, eligibility requirements, program administration and termination processes, and SDHC will conduct monitoring to ensure the program plan is being followed. The project owner will also be required to submit semi-annual written reports including tenant information, lease up rates, number of families served. SDHC will report the families leased in the program(s) as “families served” in the corresponding MTW Annual Plans and Reports.

Due to the potentially large number of persons served in this program, the extent of SDHC’s HCV waiting list, and the fact that these persons are not receiving a voucher but living in a development being subsidized as a local housing program, persons living in the project-based subsidy program will not be eligible to transfer their assistance to a tenant-based voucher. They will be required to apply for the HCV waiting list and will be subject to the same regulations as all other families on the waiting list.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures. Increase housing choices for low income families.

**Anticipated Impact:** The anticipated impact of this program will be to provide subsidy for rental units at a lower cost than a traditional tenant- or project-based voucher program, thereby housing more families without increased HUD funding. By providing a flat subsidy rate per unit and shifting administrative functions to the project owner, SDHC will reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Potential Undesirable Outcomes:** The subsidy will not be based on tenant income, but will be a flat rate per unit that is used by the project owner to maintain the buildings and/or provide any services. This model may result in families paying a larger portion of their income for rent, subject to the project owner’s program plan and contract rents. The rents will be set by the project owners but will be subject to rent reasonableness. All units in each development will be inspected using HQS criteria at the same time to simplify processes.

**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Current number of program participants (families served) is 0
- Current annual subsidy paid to project owners for Project-Based Subsidy Programs is 0
- Average per unit subsidy paid to project owners for Project-Based Subsidy Programs is \$0

*Benchmarks:*

- Annual number of program participants (families served) will be 100 by June 30, 2012
- Annual number of program participants (families served) will be 500 by June 30, 2016
- Average per unit subsidy paid to project owners for Project-Based Subsidy Programs will be less than \$850 by June 30, 2012
- Average annual lease up rate of authorized units will be 90% by June 30, 2013

*Metrics:*

- Annual number of program participants (families served).
- Annual subsidy paid to project owners for Project-Based Subsidy Programs
- Average per unit subsidy paid to project owners for Project-Based Subsidy Programs



- Average annual lease up rate

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a monthly basis. The report will summarize the data on a month to date and year to date basis. Analyzing data on a frequent basis will assist us in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Project-Based Subsidy Program for the Homeless								
Metric	Baseline 2010	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of program participants (families served)	0					100 500	6/30/2012 6/30/2016	
Annual total subsidy paid to project owners for Project-Based Subsidy Programs	\$0					N/A	N/A	
Average per unit subsidy paid to project owners for Project-Based Subsidy Programs	\$0					<\$850	6/30/2012	
Average annual lease up rate	N/A					90%	6/30/2013	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment D, Broader Uses of Funds.



## SECTION VI – ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

#	Initiative Description	Statutory Objective	Plan Year Approved	Status Update/Implementation Date	Attachment C Revisions	Outside Evaluators
1	Allow SDHC to charge lower rents for non-assisted units in SDHC-owned developments	Increase housing choices	2011	Implemented October 1, 2010	N/A	N/A
2	Authorize commitment of PBV to SDHC-owned units	Reduce cost and achieve greater cost effectiveness; increase housing choices	2011	Implemented July 1, 2010	N/A	N/A
3	Two year occupancy term for PBV tenants before eligible for a voucher	Reduce cost and achieve greater cost effectiveness	2011	Implemented July 1, 2010	N/A	N/A
4	Acquisition of additional affordable housing units in the City of San Diego	Increase housing choices	2011	Implemented July 1, 2010. SDHC would like to clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego.	N/A	N/A
5	Disregard retirement accounts	Reduce cost and achieve greater cost effectiveness	2011	Implemented August 1, 2010	N/A	N/A
6	Modify EIV Income Report Review Schedule	Reduce cost and achieve greater cost effectiveness	2011	Implemented August 1, 2010	N/A	N/A
7	Development of public housing units using a combination of funds	Increase housing choices	2011	SDHC may continue to develop additional public housing in FY2012, please see initiative 20 in this chart.	N/A	N/A
8	Sponsor-Based Vouchers for the Homeless	Reduce cost and achieve greater cost effectiveness; increase housing choices	2011	Program in development	N/A	N/A
9	Enhance FSS Program	Encourage self sufficiency; increase housing choices	2011	Implemented November 1, 2010	N/A	N/A
10	Broader Uses of Funds for IDAs	Encourage self sufficiency; increase housing choices	2011	Implemented January 1, 2011	N/A	N/A
11	Implement a revised inspection protocol	Reduce costs and achieve greater cost effectiveness	2010	Implemented June 1, 2010	N/A	N/A
12	Authorize the SDHC to inspect and determine rent reasonableness for SDHC owned properties	Reduce costs and achieve greater cost effectiveness	2010	Implemented July 13, 2009	N/A	N/A
13	Implement triennial income certifications for elderly and disabled clients	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	N/A

**ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED**



14	<p>Choice Communities Components</p> <ul style="list-style-type: none"> <li>▪ Eliminate 40% Affordability Cap</li> <li>▪ Moving for Opportunity Program</li> <li>▪ Revolving Security Deposit Loan fund</li> <li>▪ Increase payment standards in low-poverty areas</li> </ul>	Increase housing choices	2010	<ul style="list-style-type: none"> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented June 1, 2010</li> </ul>	N/A	N/A
15	Standardize utility allowances by unit size	Reduce costs and achieve greater cost effectiveness	2010	Implemented April 1, 2010	N/A	N/A
16	Simplify income and asset verification systems to reduce administrative costs	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	N/A
17	Adopt a local interim certification policy	Increase housing choices; encourage self-sufficiency	2010	Implementation scheduled for January 1, 2013	N/A	N/A
18	Establish an HCV homeownership program	Increase housing choices; encourage self-sufficiency	2010	Implemented October 1, 2009	N/A	N/A
19	Expand the PBV program	Increase housing choices	2010	Implemented September 1, 2009	N/A	N/A
20	Undertake public housing development	Increase housing choices	2010	Acquired 39 additional public housing units in FY2011. SDHC may continue this activity in FY2012, as part of the process for developing 113 units on state-aided sites as public housing.	N/A	N/A
21	Achievement Academy (formerly called the Economic Development Academy)	Encourage self-sufficiency	2009	Implemented October 1, 2010	N/A	N/A



## SECTION VII – SOURCES AND USES OF FUNDING

A. Below is a table detailing the planned sources and uses of funding:

FY12 MTW Estimated Revenues & Expenditures	
<b>Planned Sources</b>	<b>Total</b>
Section 8 Voucher Sources	185,380,583
Public Housing Capital Funds	5,556,486
Public Housing Operating Funds	13,865,602
<b>Totals</b>	<b>204,802,671</b>
<b>Planned Uses</b>	<b>Total</b>
Administration & Operations	12,752,292
Housing Assistance Payments	145,978,524
Housing Dev/Site Acquisition	17,009,065
MTW Choice Communities	38,000
MTW Economic Development Academy (Operations & Admin)	2,676,499
MTW Economic Development Academy (Job Development & Placement)	40,000
MTW Economic Development Academy (Individual Savings Accounts)	30,000
MTW Foreclosure Incentives	100,000
MTW Security Deposit Assistance Program	50,000
MTW Rent Reform/DASH	100,000
MTW Central Office Debt Payment (Partial payment of debt for SDHC Central offices pro-rated for portion used for Section 8 & 9 administration)	5,000,000
MTW Maya Loan Payoff (Pay off debt on 132 affordable housing unit development owned by SDHC)	2,300,000
Property Mgmt & Routine Maintenance Expenses	188,803
Site Improvement at Public Housing sites	111,505
Rental Assistance Program Reserves	18,427,983
<b>Totals</b>	<b>204,802,671</b>

Not included in MTW Block Grant:  
 HCV FSS & FSS HO Coordinator grants  
 ROSS Neighborhood Networks  
 Section 8 Mod Rehab  
 Section 8 VASH



- B. SDHC will not use any State or local funds for the MTW program.
- C. COCC – N/A
- D. SDHC is using a cost allocation approach that meets HUD’s requirements.
- E. SDHC will use single-fund flexibility in support of MTW activities rather than creating numerous budgets. SDHC combines funds from public housing operating funds and capital fund assistance (authorized by section 9 of the United States Housing Act of 1937 [the Act]) and voucher funds (authorized by section 8(o) of the Act) to implement a block grant/single fund budget approach to budgeting and accounting. SDHC has consolidated public housing and housing choice voucher program funds to implement the approved Moving to Work initiatives described in this Plan and in future Plans.

Funds that originated as voucher or public housing funds may be used for all of these activities.

SDHC may use public housing and/or voucher funds to acquire and rehabilitate public housing and affordable housing developments. These funds would be used for the capital to acquire, rehabilitate, or produce housing units that will comply with public housing development requirements. The units then could receive operating subsidy as replacement housing.

The following are being funded, at least partially, with the single-fund budget:

- FY2009/2010: Economic Development Academy, Choice Communities, Housing Choice Voucher Homeownership Program (Foreclosure Incentives), and Public Housing Development/Acquisition.
- FY2011: Acquisition of Additional Affordable Units, Public Housing Development/Acquisition, Sponsor-Based Vouchers for the Homeless Program, Enhancing Family Self-Sufficiency Program, and Broader Uses of Funds for IDAs.
- FY2012: Path to Success rent reform, Modification of Full Time Student Definition, and Project-Based Subsidy for the Homeless.

None of the above would be possible without the flexibility to combine funds into a single budget, allowing SDHC to use funds in a non-traditional way in order to best meet local needs.

#### UPDATE ON RHF AND ARRA FUNDS

It is anticipated that RHF funds will be received during Fiscal Year 2012 and will be used in conjunction with other funds to acquire and rehabilitate public housing units. The RHF funding is anticipated to be approximately \$1.9 million for Fiscal Year 2012. No further ARRA funds are expected to be received.



## **SECTION VIII – ADMINISTRATIVE INFORMATION**

- A. Resolution signed by the Board of Commissioners: See Appendix A
- B. SDHC will use annual MTW Reports as its evaluation mechanism.
- C. Evidence of Community and Resident Participation: See Appendix B



## **APPENDIX A**

A. Board Resolutions –



## APPENDIX A

SAN DIEGO HOUSING COMMISSION

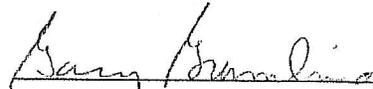
RESOLUTION NO. 1509

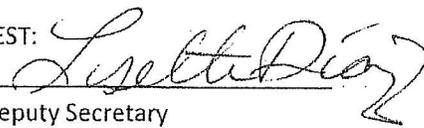
ADOPTED ON MARCH 18, 2011

WHEREAS, on March 18, 2011 the San Diego Housing Commission Board of Commissioners approved the submission of the proposed Annual Moving to Work Plan for July 1, 2011 through June 30, 2012 to HUD.

I HEREBY CERTIFY that the abovementioned is true and correct as passed and adopted by the San Diego Housing Commission, of the City of San Diego, California on March 18, 2011.

Vote:           Yeas – 5  
                  Nays – 0  
                  Absent – 2

  
\_\_\_\_\_  
Chairperson, San Diego Housing Commission

ATTEST:   
By: \_\_\_\_\_  
Deputy Secretary



**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, 2011, 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 and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

San Diego Housing Commission  
PHA Name

CA063  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title

  
Signature

\_\_\_\_\_  
Date



## APPENDIX B

### Public Hearing Notice and Evidence of Community and Resident Participation

The San Diego Housing Commission (SDHC) formally solicited public comment on the Fiscal Year 2012 Annual Plan Draft in order to incorporate the ideas of participants, community advocates, and interested citizens into the proposed plan as well as answer questions pertaining to Moving to Work subject matter. A formal public hearing was held on February 9, 2011 at the SDHC corporate office for the purposes of educating the public and receiving comments. A public notice was circulated in four local publications (San Diego Daily Tribune, Union Tribune, Voice & Viewpoint, and La Prensa) to encourage public involvement. In an attempt to encourage further participation among San Diego residents and program clients, SDHC issued personal invitations to a selected group of participants and advocates. The majority of individuals receiving the personal invitations were current rental assistance recipients and therefore were positioned to provide practical suggestions and feedback. All methods of invitation provided residents of San Diego with multiple options for contacting appropriate personnel with comments if unable to attend the public hearing. Overall, SDHC received positive feedback concerning the proposed initiatives.

Previous to the formal public hearing, SDHC conducted two onsite presentations to disseminate information concerning the proposed rent reform model also known as Path to Success. On December 14, 2011 SDHC staff presented information about the initiative to a group of local advocates and current rental assistance program participants. Path to Success was explained in detail to each group with an opportunity for attendees to provide feedback, offer commentary, and request clarification on concepts.

The following information serves as proof of public hearing notice and community participation:

- ✓ Proof of Publication – La Prensa San Diego
- ✓ Proof of Publication – The Daily Transcript
- ✓ Proof of Publication – The San Diego Union Tribune
- ✓ Proof of Publication – The San Diego Voice and Viewpoint
- ✓ Public Hearing Sign-In Sheet
- ✓ Rent Reform Meeting Advocate Sign-In Sheet
- ✓ Rent Reform Meeting Participant Sign-In Sheet
- ✓ Public Comment Matrix

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**PUBLIC NOTICE**

**PUBLIC NOTICE**

**PUBLIC NOTICE**

The San Diego Housing Commission (SDHC) announces its intent to solicit public comment on its proposed Fiscal Year 2012 Moving to Work (MTW) Annual Plan effective July 1, 2011. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2012 (July 1, 2011 through June 30, 2012). Examples of the program and policy changes being considered include: Reforming the administration of the Housing Choice Voucher program and developing innovative solutions to San Diego's need to provide solutions to homelessness. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning January 21, 2011. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 9, 2011 at 9:00 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to February 23, 2011 to the following address: SDHC/MTW, 1122 Broadway Suite 300, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly, Project Coordinator at [rentreform@sdhc.org](mailto:rentreform@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125.

Published: 1/14,21/2011 La Prensa San Diego

**REQUEST FOR QUALIFICATIONS**

**REQUEST FOR QUALIFICATIONS**

**REQUEST FOR QUALIFICATIONS (RFQ)**  
NO. PS-11-0739-02

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# CERTIFICATE OF PUBLICATION

Jennifer Kelly  
San Diego Housing Commission  
1122 Broadway, #300  
San Diego CA 92101

## IN THE MATTER OF MTW 2012 Public Hearing Notice

### PUBLIC NOTICE

The San Diego Housing Commission (SDHC) announces its intent to solicit public comment on its proposed Fiscal Year 2012 Moving to Work (MTW) Annual Plan effective July 1, 2011. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. SDHC is soliciting public comment on the program and policy changes being considered include: Reforming the administration of the Housing Choice Voucher program and developing innovative solutions to San Diego's need to provide solutions to homelessness. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning January 21, 2011. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 9, 2011 at 9:00 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to February 23, 2011 to the following address: SDHC/MTW, 1122 Broadway Suite 300, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly, Project Coordinator at [rentreform@sdhc.org](mailto:rentreform@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125  
Pub. Jan 14, 21-00083086

## CASE NO.

I, Cathy L. Krueger, am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the above entitled matter. I am the principal clerk of the San Diego Transcript, a newspaper of general circulation, printed and published daily, except on Saturdays and Sundays, in the City of San Diego, County of San Diego and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of January 23, 1909, Decree No. 14894; and the

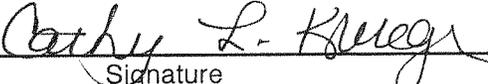
### Public Notice

is a true and correct copy of which the annexed is a printed copy and was published in said newspaper on the following date(s), to wit:

**January 14, 21**

I certify under penalty of perjury that the foregoing is true and correct.

Dated at San Diego, California this January 21, 2011

  
\_\_\_\_\_  
Signature

P.O. Box 120191, San Diego, CA 92112-0191

**AFFIDAVIT OF PUBLICATION**

**PUBLIC NOTICE**

SAN DIEGO HOUSING COMMISSION  
1122 BROADWAY #300  
ATTN:ACCOUNTS PAYABLE  
SAN DIEGO, CA 92105-5612

STATE OF CALIFORNIA } ss.  
County of San Diego }

The Undersigned, declares under penalty of perjury under the laws of the State of California: That she is a resident of the County of San Diego. That she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that she is not a party to, nor interested in the above entitled matter; that she is Chief Clerk for the publisher of

**The San Diego Union-Tribune**

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Jan 14, 2011, Jan 21, 2011

  
Chief Clerk for the Publisher

1-26-11  
Date

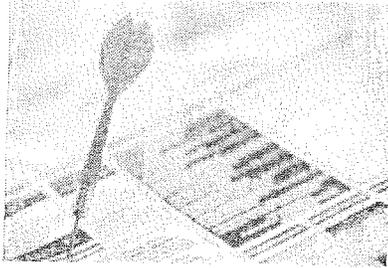
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Legal Advertisement  
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ORDERED BY: JENNIFER KELLY/RENAE ROD

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FISCAL SERVICES

The San Diego Housing Commission (SDHC) announces its intent to solicit public comment on its proposed Fiscal Year 2012 Moving to Work (MTW) Annual Plan effective July 1, 2011. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2012 (July 1, 2011 through June 30, 2012). Examples of the program and policy changes being considered include: Reforming the administration of the Housing Choice Voucher program and developing innovative solutions to San Diego's need to provide solutions to homelessness. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning January 21, 2011. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 9, 2011 at 9:00 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to February 23, 2011 to the following address: SDHC/MTW, 1122 Broadway Suite 300, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly, Project Coordinator at [renafreem@sdhc.org](mailto:renafreem@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125.



# Classifieds / Le

## EMPLOYMENT OPPORTUNITY

### WANTED Part Time Graphic Artist

Newspaper layout experience preferred but not necessary. Community paper has opening for Mondays and Tuesdays.

### Wanted Freelance Journalist

A freelance journalist is wanted for specific assignments. Must have own digital camera equipment and transportation.

## NEWSPAPER DISTRIBUTORS NEEDED

Weekly pay. Local San Diego route. Please call Deniece at (619) 266-2233.

## NEWSPAPER STAND REPAIR PERSON NEEDED

Please call Deniece at (619) 266-2233.

## INVITATION FOR BIDS

### DEL MAR BLUFFS III PROJECT

CIP 1143000 (IFB 5001601)

Torio. Bids arriving later than 2:30 p.m., or at a location other than 401 B Street, 7th Floor, will not be considered.

SANDAG is an equal opportunity employer and, as a matter of policy, encourages the participation of small businesses that are owned and controlled by minorities and women. Joint ventures are also encouraged where feasible. 01/13, 01/20

## NOTICE TO BIDDERS

NOTICE IS HEREBY GIVEN that the City of San Diego will receive bids for work at the Purchasing and Contracting Department, Contracts Division, 1200 Third Avenue, Suite 200, San Diego, California, where bids are to be submitted prior to time specified. Plans and specifications can be obtained from The City of San Diego's website: <http://www.sandiego.gov/bids-contracts>. A pre-bid meeting and/or pre-bid visit to the work site will be held, if indicated, at the time and place specified in the contract documents. Prospective bidders are encouraged to attend these sessions.

It is the policy of the City of San Diego to encourage equal opportunity in its construction, consultant, material and supply contracts. Bids/proposals from small businesses, minority-owned, disabled, veteran-owned businesses, women-owned businesses and local firms are strongly encouraged. Contractors are encouraged to subcontract and/or participate in joint ventures with these firms. The City is committed to equal opportunity and will not discriminate with regard to race, religion, color, ancestry, sex, age, or

proposed Fiscal Year 2012 Moving to Work (MTW) Annual Plan effective July 1, 2011. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2012 (July 1, 2011 through June 30, 2012). Examples of the program and policy changes being considered include: Reforming the administration of the Housing Choice Voucher program and developing innovative solutions to San Diego's need to provide solutions to homelessness. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning January 21, 2011. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 9, 2011 at 9:00 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to February 23, 2011 to the following address: SDHC/MTW, 1122 Broadway Suite 300, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly.

San Diego Housing Commission 1122 Broadway, Suite 300 San Diego, CA 92101

Contact: Greg Wellong (619) 578-7571 Email request to: [gregwel@sdhc.org](mailto:gregwel@sdhc.org)

Sealed proposals marked "Housing Rehabilitation Consultant Services (RFP# RHB-CS-11-1) Bid Documents -- Do Not Open" must be received on or before **Monday, January 31, 2011 at 2:00pm** (PST). Three (3) additional copies of the proposal and a completed electronic file containing the proposal on CD-R must be submitted with the original proposal packet to the address above. Late proposals will not be accepted.

The attention of bidders is directed to the fact that the proposed work may be financed in whole or in part with Federal Funds. 01/20

## CITY OF SAN DIEGO

## PUBLIC UTILITIES DEPARTMENT

## REQUEST FOR PROPOSAL

FOR

## IMPLEMENTATION OF ADVANCED METERING INFRASTRUCTURE (AMI) SYSTEM (H115284)

The City of San Diego (City) is requesting proposals from highly qualified



# Rental Assistance Department \ Rent Reform Meeting

Name	Signature	Organization
NEEDIE VAND	[Signature]	Community Interface Svc
RANDALE SIMMARD	[Signature]	SAN DIEGO COMMUNITY HOUSING CORPORATION
Sophie Lor	[Signature]	San Diego County Office of Education
Mindy Dittman	[Signature]	San Diego County Office of Education
Len Villaluzo	[Signature]	"
Betty King	[Signature]	ECS
MARIA RIOS	[Signature]	National City Housing
Ketrina Thompson	[Signature]	SHTC
Jan Uhlus	[Signature]	TACHS
Nathan Schmidt	[Signature]	Social Housing Coll.
JEFF DAVIS	[Signature]	SDHC
Eddie Dumke	[Signature]	SBAS
Heather John	[Signature]	SDUSD
Laurence Conyell	[Signature]	SDUSD
THIA LEVIN	[Signature]	CSH
Yous Pierre Chung	[Signature]	SD Housing Ed

# Rental Assistance Department \ Rent Reform Meeting

Name	Signature	Organization
Jessica Jurclicitsky		TACHS
Arianna Skinn		LAASD Disability Rights
Arianna Skinn		Disability Rights
Eliana Keenan		Community Entrance
Krista Machado		Downside HA
Andrzejewski		"
Lori Saldate		SIAPV
Lola Ponce		SUDR
Ken Peters		RICHARDSON
Ben Rogers		HOE
Abbie Davis		Poway Law firm
TINESIA CONWELL		SOHC
Jessica Rathbone		SDHC Intern
Robin Seayles		NOPE
Arianna Skinn		Chadler Community
Steven Kellman		Tenants Legal Center
Judy Davis		Reggie Hill



Group/Agency	Questions/Comments Received	SDHC Responses
Tenants Legal Center	Many tenants have voiced a concern about the possibility of losing rental assistance if they increase household income. Based on the presentation about Path to Success, this is not true. It would be great if tenants had easy access to information like this so they understand they will not lose their Section 8 if they increase their income.	Thank you for the comment. We will look at disseminating the information to our clients to show it is rarely the case Section 8 participants lose their rental assistance when household income increases.
Recovery Innovations of California (RICA)	Many Section 8 participants have mental health challenges; they are fine one day, but not the next. Have you looked at exploring a safety net policy for these types of families?	As part of Path to Success, we have created hardship policies and still have some under formation. We can take this type of family into account when fine tuning our hardship policies.
Recovery Innovations of California (RICA)	Sometimes a disabled family will earn enough income to become self-sufficient, but then their disability causes them to lose the income. Is there a policy allowing a family to come back on the program if assistance was terminated due to self-sufficiency, but they need rental assistance again?	Aside from Moving to Work, there is policy where there is a grace period of 180 days you are technically on the program even though you have enough income to pay your full rent portion and we aren't paying any Housing Assistance Payments to your landlord. If your income decreases in the 180 day period, we adjust your rent portion. If we begin paying part of your rent portion again, you will remain on the rental assistance program.
Recovery Innovations of California (RICA)	Have you considered a flexible entry and exit for FSS participation? Sometimes people join FSS and cannot complete the contract because something comes up in their life prohibiting them graduating. Then they are not allowed to re-enter the program again.	We can look into that as a possible future initiative. First, we will have to research whether or not MTW flexibility will allow us to waive this particular regulation. Thank you for the suggestion.
Advocate	Are you requiring participants to engage in the FSS program?	No. While we strongly encourage participants to join FSS, it is not mandatory. It's something we can consider for the future, but right now there are no plans to require participants to enter into an FSS contract.

Group/Agency	Questions/Comments Received	SDHC Responses
Disability Rights of California	I'm concerned about the Triennial population. How will Path to Success impact disabled clients?	Path to Success was designed to be impact neutral for our elderly/disabled households. Triennial households will see some of the streamlining measures built into the Path to Success model, but will not be subject to the progressive nature of the rent reform activity.
Disability Rights of California	How much subsidy will the elderly and disabled families receive when Path to Success is implemented? A lot of families still don't have enough money to eat and live even now with SSI.	The Total Tenant Payment for the elderly/disabled Triennial families will be reduced from 30% to 28.5% with 75% of our families seeing a small reduction in their rent portion. As for the other 25%, we estimate around 5% will have the same rent portion and 20% will see a slight increase. Hardship policies are being created to address these types of issues.
Disability Rights of California	I suggest you don't change anything about the administration of the Section 8 program.	Thank you. We will note your suggestion.
Advocate	Current Housing Choice Voucher participants will be a part of Path to Success. What about future applicants?	All future participants coming onto the Housing Choice Voucher program will be brought in on the current phase of Path to Success.

Group/Agency	Questions/Comments Received	SDHC Responses
Oceanside Housing Authority	How will Path to Success affect port-outs and port-ins and how will you educate households about the changes? What is the impact on other housing authorities?	Households porting into San Diego will be subject to Path to Success. We have been in contact with the San Bernardino Housing Authority, another MTW agency, about the types of information they disseminated to clients porting in and out of their jurisdiction. We'll use some of their suggestions to create an information sheet to give to households considering the port option. It shouldn't really affect other housing authorities with the exception of if we are administering the voucher. We'll need to recertify the client's income and household composition annually instead of on a biennial schedule.
Oceanside Housing Authority	Will you be absorbing or administering the transfers?	It will be dependent upon funding on whether we absorb or administer the port-in.
Advocate	You will have minimum rents for every Work-Able family?	Yes. Currently our minimum rent is \$50; it will change to \$100 for a 1 Work-Able household and \$200 for a 2+ Work-Able household during the first two years of implementation.
Advocate	What about families with adults who are Work-Able, but can't work because of a disabled child?	Hardship policies are in formation to address sub-populations such as this one.

Group/Agency	Questions/Comments Received	SDHC Responses
Advocate	Some seniors or disabled people can have their rent increased even though they don't have any more income, but could be asked to provide more rent.	They would be part of the elderly/disabled Triennial group, but a landlord can ask for and be granted a rent increase if the amount is determined rent reasonable. In our analysis, the one of the reasons for rent increases was because some people are renting units where the gross rent is higher than the payment standard.
Advocate	Have you considered victims of domestic violence when creating your initiatives?	We had some preliminary conversations with the San Diego Family Justice Center about providing vouchers to victims of domestic violence.
Advocate	If an Exception Rent has been granted, will the household still pay a higher share of the rent? Could more information be disseminated about what situations would cause an increase, looking at elderly/disabled households, and how it will affect them.	We have conducted extensive analysis and looked at specific examples of households impacted by rent reform. We are trying to pinpoint every possible scenario so we can be sure everything has been considered when forming our policies. If an Exception Rent has been granted, then the higher payment standard will be used when calculating the tenant's rent portion.
Advocate	Are you still providing reasonable accommodations under Section 504, including Exception Rents?	Yes. Our Section 504 compliance will not change; each request is handled on a case-by-case basis.
Advocate	Do you have a list of reasonable accommodations posted anywhere?	There are a variety of reasonable accommodations which can be granted to participants. The best way to handle a reasonable accommodation request is for the head of household to submit a request in writing to their case manager to start the process.

Group/Agency	Questions/Comments Received	SDHC Responses
Advocate	I have a question concerning the tiered rent table. Why is the rent portion less in larger units?	The utility allowance is included in the chart. The rents in the charts were calculated based on a percentage of the monthly income with the utility allowance subtracted out. Since there is a higher utility allowance for larger units, the rent portion is actually less for families with the same monthly income. This allows adjustments for larger families.
Legal Aid of San Diego	Do you have any information on how many clients are paying \$80 or less each month right now?	Our detailed analysis does not show the participants paying exactly \$80 or less; we have information broken down in other increments. We will be more than happy to analyze our data more and email you the answer.
Advocate	Do you have a copy of this information?	The annual plan is not yet approved by HUD, so we don't have anything to disseminate at this time. However, we will email all attendees when the draft of the Fiscal Year 2012 MTW Plan is posted on the website. The Plan will contain the Path to Success initiative.
Advocate	Why would you implement this program when unemployment is so high?	Path to Success is not scheduled to be implemented until January 2013. We have conducted much research on the state of the economy in San Diego, projected job growth, local growing industries, and the types of jobs that will be available for our particular clientele. Research states the two growing industries in San Diego are healthcare and hospitality. The types of entry level jobs available in these two industries have average annual incomes that will easily allow our clients to pay even the most aggressive minimum rent. If for any reason the economy does not improve by January 2013, SDHC can make the decision to delay implementation.

Group/Agency	Questions/Comments Received	SDHC Responses
Advocate	What kinds of workshops and tools are available through the program?	<p>We administer the Family Self-Sufficiency program through our Achievement Academy. Participants enrolled in FSS choose individual goals to work toward throughout the duration of the contract. When there is an increase in income, SDHC will match the increase and place the money in an escrow account. Upon graduation from FSS, the family cashes out the escrow account and can use the money for a variety of reasons. Sometimes the family uses it for a down payment on a house. We have a benefits administrator from THRIVE who matches clients with benefits they may be eligible for. We have a variety of workshops and classes to help with career exploration, career planning, and career development. We have basic computer skills classes in our new computer lab. There is small business development and expansion. There are Individual Development Accounts where SDHC matches all deposits at a 3:1 ratio. We are currently selecting a job placement specialist who will actually be able to place persons in jobs through the different connections. We have partnerships to assist with job training. For example, Sherwin-Williams offers a class where participants can learn to paint and be placed in a job when the training is complete. We are looking at green jobs training for entry level positions in the industries where green jobs are becoming more common.</p>
Licensed Social Worker	Do you think one job placement specialist is enough for over 7,000 households?	<p>We are looking at adding additional resources within our Achievement Academy, but one thing to keep in mind is that not all of our households will require the services of a job placement specialist. Also, since we are implementing Path to Success in January 2013, we have almost two years for outreach before Path to Success begins to assist participants with obtaining employment. Also, the first two years of Path to Success are a transition period. That's almost four years to help our participants find employment. We plan to focus on our most impacted households first and give them priority.</p>

Group/Agency	Questions/Comments Received	SDHC Responses
Advocate	Can you explain the FSS program?	The FSS program is a 5 year contract a client enters into to help increase income and gain self-sufficiency. Income increases are monetarily matched by SDHC and placed into an escrow account. Clients create goals for which they work towards satisfying. Upon graduation, the client receives all of the money in the escrow account which they can use to purchase a car, put a down payment on a house, or however they see fit. One of the requirements for FSS participation is the head of household must be enrolled in order for other adult household members to participate in FSS. One of our past initiatives waived the requirement so now any adult can choose to participate regardless of whether or not the head of household participates.
Advocate	What about the families that won't be able to pay their rent? How will they be impacted?	We will be conducting substantial outreach before implementation and during the two year transition period to make sure our most impacted families are connected with our Achievement Academy services so they can transition seamlessly into Path to Success. The goal is to touch every family on the program before implementation whether it's to educate them on the changes or assure they receive the necessary supportive services to be successful. In phases two and three of Path to Success, it is possible a family will not be able to pay rent for some reason. We have a variety of hardship policies in these special cases.
Recovery Innovations of California (RICA)	Can the Triennial families participate in the Achievement Academy?	Yes. It is our hope Triennial families will take advantage of all of the services available in the Achievement Academy. Services are not just reserved for our Work-Able population.

Group/Agency	Questions/Comments Received	SDHC Responses
Advocate	What types of services are available at the Achievement Academy?	<p>We have a benefits matching specialist who helps connect clients with benefits they are eligible for; a job placement specialist who actually has connections with local employment agencies and employers who can help our clients become employed; there are classes and workshops on topics such as career exploration, career planning, job development, and small business development; we have a computer lab with 30 computers clients have access to; we offer classes on basic computer skills and hope to offer more advanced classes in the near future. We are also strengthening relationships with the Labor Council and a variety of apprenticeship programs to begin to offer more options surrounding employment opportunities. The FSS program and related activities fall under the umbrella of the Achievement Academy. Some of the classes offered are a result of a couple of surveys we sent out to our participants. They stated the two most desired resources the Academy could offer are job placement and vocational training, both of which have been and are being expanded.</p>