



The San Antonio Housing Authority Draft Plans for:

- **Moving to Work**
- **Public Housing Admissions and Continued Occupancy Policy (ACOP)**
- **Housing Choice Voucher Administrative Plan**
- **Capital Fund Program**

March 2, 2010

Introduction

The U. S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to annually submit a five-year annual business plan, commonly referred to as the PHA (Agency) Plan(s).

Due to SAHA's designation as a Moving To Work (MTW) agency, the MTW Plan will instead serve as SAHA's long-term and annual business plan, and will describe SAHA's policies, programs, operations, strategies and flexibilities in meeting the local housing needs and goals.

The MTW program allows SAHA to design and test ways to:

- promote self-sufficiency among assisted families;
- achieve programmatic efficiencies and reduce costs; and
- increase housing choices for low-income households.

Introduction

As an MTW agency, SAHA will have the opportunity to implement new policies outside of the usual scope of HUD policies and regulations. This will allow SAHA to achieve its mission and program goals by leveraging the unique needs and concerns of SAHA's various communities.

The proposed MTW Draft Plan is the result of months of collaborative efforts among stakeholders, representing business, advocates, residents and community members.

The MTW Plan will include:

- The Public Housing Admissions and Continued Occupancy Plan (ACOP);
- The Housing Choice Voucher Administration Plan (Admin. Plan); and
- The Capital Fund Program Plan.

Introduction

The tentative schedule for the remainder of the planning process, public engagement and submission to HUD is as follows:

February 8, 2010	Post notice of Public Comment period
March 2, 2010	Stakeholder meeting
February 8-26, 2010	Resident meetings for all public housing properties
March 18, 2010	Public Hearing/Special Meeting of Board of Commissioners
April 8, 2010	Board of Commissioners Meeting – for approval
April 15, 2010	Submission to HUD

MTW

- A primary goal of the Moving to Work Program is to increase employment and employment earnings

- The MTW Program strives to accomplish these goals by promoting educational and job training opportunities, and by addressing barriers to employment, such as access to child care, affordable transportation, etc.:
 - SAHA will collaborate with schools and non-profit agencies to promote and offer educational opportunities
 - Specific job training opportunities will be offered in collaboration with partners
 - SAHA will collaborate and co-locate child care providers at public housing sites
 - The barrier of transportation will also be addressed for MTW participants
 - MTW participants will be referred to social service agencies in order to address other barriers to employment

MTW

Activity 1: Single Fund Budget with Full Flexibility

- ❑ SAHA will combine resources from Public Housing, Housing Choice Voucher, and Capital Funds under a single fund block grant
- ❑ This flexibility will enable SAHA to allocate federal resources to support the self-sufficiency activities described under the MTW Plan
- ❑ SAHA will ensure that all programs are sufficiently funded to continue successful administration and operations

MTW

Activity 1(a): Promote Education Through Partnerships

- ❑ SAHA will address the high school drop out rates among our Public Housing and Housing Choice Voucher Program
- ❑ It is estimated that 40% of San Antonio students drop out of high school
- ❑ SAHA will design a pilot program in collaboration with Gateway to College
- ❑ Gateway to College is a San Antonio College program that helps students who have dropped out of high school, or who may not graduate, earn high school credits while earning college credits. Gateway to College provides free tuition, books, transportation and one meal a day. Many of the students will go on to finish an Associate of Arts Degree and transfer to four-year colleges
- ❑ SAHA will provide incentives to those who participate in the program by offering a paid Work Experience/OJT in order to encourage successful completion of program

MTW

Activity 1(b): Pilot Child Care Training

- ❑ SAHA will also address child care barrier to employment by partnering with child care training agencies to provide a customized child care training program to public housing residents wanting to become certified child care providers
- ❑ It is estimated that 1 out of 3 families do not work due to not having adequate child care services available
- ❑ SAHA will offer a paid work experience as an incentive of successful completion of the program
- ❑ SAHA will co-locate child care providers at some of the family public housing sites and offer child care services on site to MTW participants participating in an approved self sufficiency activity

MTW

Activity 1(c): Holistic Case Management

- The Holistic Case Management approach is an evidence based practice that addresses all of the needs of a person through a community of resources
- Currently SAHA does not have the capacity to provide extensive case management services. However, under MTW, SAHA will utilize single budget flexibility to add additional case managers and co-locate partners at the sites to provide a holistic case management approach
- Through the holistic case management approach residents' barriers to employment will be addressed in collaboration with partners

MTW

Activity 1(d): Resident Ambassador Empowerment

- ❑ SAHA will implement a Resident Ambassador Empowerment program as a way of encouraging and supporting the involvement of residents who are dedicated to strengthening the social and economic conditions of their community
- ❑ Resident Ambassadors will assist with MTW and other self-sufficiency activities by assisting with creating and sustaining organic support networks among residents, service providers, connecting residents to jobs and economic opportunities, conduct outreach, coordinate community events, and leverage local resources
- ❑ Resident Ambassadors will be paid a monthly stipend as an incentive for their participation

MTW

Activity 2: Simplify and Streamline HUD Approval Process for Development, Redevelopment and Acquisitions

- ❑ SAHA has a great need for affordable housing opportunities for its residents
- ❑ Through this flexibility SAHA intends to address the goal of increasing housing choices for low income families
- ❑ SAHA will request that the HUD approval process for real estate transactions, such as acquisitions, financing and divestiture, be simplified through the granting of measures and waivers as outlined in HUD's Proposed Rule for streamlining the application process for mixed-financed development of public housing units, as published in the Federal Register on December 27, 2006.

MTW

Activity 3: Biennial Recertification for Public Housing Elderly/Disabled Residents

- **Change annual re-examination of elderly and disabled families from once every year to biennial (every 2 years).**

Impact to Participants:

Because of the biennial re-examinations if participants receive an increase in benefits they will have the opportunity to save increased income for a longer period of time before adjustments to the rent portion occurs. Historically as increases to benefits are experienced they are offset by increases to Medicare costs.

However reductions in income or increased medical expenses experienced by the participants may be reported to SAHA and if a rent reduction is warranted, rents will be adjusted accordingly.

Convenience of participants not having to come in every year. Participants will be provided better customer service by SAHA staff due to time savings of SAHA staff and implementation of Holistic Case Management.

Impact to Agency:

The anticipated impact is to increase staff efficiencies by reducing the time utilized for processing annual re-examinations and will reduce the use of paper products. The time saved by staff will allow them to perform other tasks such as inspections and referrals for services needed by participants (Holistic case management model). It is expected the financial impact to the agency will be insignificant because historically increases to benefits have been minimal (2% or less).

MTW

Activity 4: Streamline Methods of Verification for Public Housing and Housing Choice

Voucher Programs: Transition from the use of third party verification of income for participants to participant provided documents; third party verification of assets will only be required for assets totaling a value of \$25,000 or more; the mandatory use of HUD's income computer matching system (Enterprise Income Verification (EIV) System) will continue and quality control measures to randomly select participant accounts and require additional verification to ensure the integrity of the verification policy may be employed

Impact to Participants:

It is anticipated that annual and interim recertifications will be processed more expeditiously as a result of a decrease in required documentation. For HCV this allows for timely HAP payments as well as a reduction in gaps of assistance due to delayed processing of recertifications. For Public Housing the time saved as a result of a decrease in required documentation allows SAHA staff to provide case management activities.

Impact to Agency:

The anticipated impact is to increase timely completion of annual and interim recertifications, increase efficiencies, and reduce the use of paper products.

MTW

Activity 5: Requirements for Acceptable Documents for Public Housing and Housing Choice Voucher Programs: Revise the length of time that applicant and participant provided documents would be valid for verification purposes (60 days to 90 days for applicants; 120 days to 180 days for participants)

Impact to Participants:

Participants will be aided in the need for retrieval of required documentation by allowing the utilization of documents for an extended period of time. As a result, services for the participant may be provided in a more efficient and timely manner.

Impact to Agency:

The anticipated impact is to increase timely completion of annual and interim recertifications, increase efficiencies, and reduce the use of paper products.

MTW

Activity 6: Flat Utility Allowance for HCV: Establish a flat utility allowance based on bedroom size and unit type

Impact to Applicants/Participants:

Certifications may be processed more accurately as a result of the elimination of the utility allowance calculation. Additionally, landlords will be able to identify whether a tenant qualifies for a unit more effectively, resulting in a more timely access to the unit for the participant. While it's anticipated that this may decrease the rent portion, there is a possibility that this may slightly increase their rent portion.

Impact to Agency:

The anticipated impact is to increase efficiencies, reduce the use of paper products, and may increase HAP costs.

MTW

Amendment 1

- **Frozen Rents:** SAHA proposes to freeze rents to the 2004 baseline with the ability to retain any increases in rent.

Impact to Participants:

Improves service delivery to all residents by allowing the authority to utilize additional revenue for local initiatives benefiting residents.

Impact to Agency:

This will help offset the cost of services required to implement MTW.

MTW

Amendment 2

- ***Amend MTW Agreement to allow broader uses of funds:*** The amendment provides SAHA with the authority to use MTW funds and activities to provide housing assistance for low income families, whether or not any such use is authorized by Section 8 or 9 of the 1937 Act, provided such uses are consistent with other requirements of the MTW statute.

Impact to Participants: This initiative would provide housing models that better leverage housing delivery systems for qualified low-income households.

Impact to Agency: Allows the agency the fungibility to expend MTW funds to develop partnerships for the creation of expanding housing choices.

MTW

Amendment 3

- ***Continue to keep SAHA's Public Housing High Performer status under the MTW designation:*** When SAHA entered into the MTW designation in 2000, SAHA received a high performance rating under Public Housing Assistance System (PHAS). Since MTW agencies are not required to report under PHAS, SAHA requests the high performer status to be retained throughout the demonstration period.

Impact to Participants: *Increased benefits with additional funding such as capital improvements and additional services.*

Impact to Agency: *Allows SAHA to receive funding bonuses and special programs eligibility (i.e. stimulus funds).*

MTW

Amendment 4

- ***HCV Administrative Fees:*** SAHA proposes to be equally compensated for all units leased regardless of whether it is a PHA owned or non PHA owned unit.

Impact to Participants: *Invest in efficiencies for enhanced client services.*

Impact to Agency: *Increases the operational funding for the HCV program.*

MTW

Amendment 5

- **Frozen Utilities:** SAHA proposes to freeze utility consumption in Public Housing for purposes of subsidy calculations at the current consumption level.

Impact to Participants:

Allows the Housing Authority to use the additional funds to improve service delivery (case management, customer service, supportive services), improve living conditions and common areas for Public Housing residents.

Impact to Agency:

This will help offset the cost of services, property improvements or other approved uses.

MTW

Amendment 6

- **Streamlining the HUD approval process for acquisitions, development and redevelopment:** SAHA is proposing to ask for flexibility from HUD to simplify the HUD requirements for the development, redevelopment and acquisitions of Public Housing units.

Impact to Participants: *Increase housing choices for low-income families.*

Impact to Agency: *SAHA will save processing time for mixed financed transactions and acquisitions, resulting in a reduction of professional legal fees and expediting the creation of public housing and affordable units.*

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- **FORMAT** – The format of the Admissions & Continued Occupancy Policy was changed to a more condensed version of policy only excluding background and procedural information.

Impact to Applicants:

The document will be much easier to read and understand.

Impact to Agency:

The format change reduces the document by two thirds, reduces costs of reproduction, will be more convenient to use and be a better more concise training tool.

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- ▣ **SELECTION METHOD LOCAL PREFERENCES** – Clarifies that applicants must provide verification before they can be placed on the waiting list with the preference requested.

Impact to Applicants:

This change will be allow applicants to better understand their waiting time based on their preference.

Impact to Agency:

This change will allow the applicant to be placed on the correct waiting list with the proper preference points thus avoiding administrative costs with changes.

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- **HOMELESS PREFERENCE** – Add language allowing a cap for homeless preferences based on a ratio of the area's extremely low-income population. The cap for homeless served in 2010 should be no more than 5% of total public housing units.

Impact to Applicants:

Allows a more equitable number of homeless applicants in the program that mirrors the city's demographic of extremely low income households.

Impact to Agency:

There is no impact to the agency.

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- **TYPES OF PHA REQUIRED TRANSFERS** – Include transfers to address arbitration, mediation, and/or satisfy legal judgments or agreements.

Impact to Participants:

Allows more flexibility to participants to transfer to another property to satisfy mediation, legal judgments or agreements.

Impact to Agency:

There is no impact to the agency.

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- **WAITING LIST** - Change the current single community wide waiting list to a site based waiting list.

Impact to Applicants:

Allow applicants more flexibility to choose where they wish to reside.

Impact to Agency:

Moves the responsibility of managing the waiting list to the property level.

Public Housing Admissions & Continued Occupancy Policy

PHA Discretionary Revisions

- **EMERGENCY TRANSFERS** – Allow the Public Housing Director (s) to consider verbal requests from law enforcement for immediate health and safety issues. Written documentation will follow the verbal request within 24-hours. If alternative housing is not available in public housing they may be referred to a tenant-based Section 8 voucher if one is available.

Impact to Participants:

Allows applicants to be moved quickly in a situation where they have immediate health and safety concerns.

Impact to Agency:

Allows the process to react much quicker to immediate health and safety concerns.

Public Housing Admissions & Continued Occupancy Policy

Mandatory Revisions

- **PIH Notice H 2009-11** – Incorporate determination if an applicant/participant and/or member is subject to a lifetime registration requirement under a state sex offender registration program

Impact to Agency and Applicants/Participants:

Applicants/Participants registered as lifetime state sex offenders will be unable to participate in the program.

Public Housing Admissions & Continued Occupancy Policy

Mandatory Revisions

- **PIH Notice H 2009-13** – Incorporate Form HUD-92006, Supplement to Application for Federally Assisted Programs, which provides applicants/participants the option to identify an individual or organization that SAHA may contact and the reason(s) the individual or organization may be contacted

Impact to Applicant/Participants:

It is anticipated that delays in processing accounts will be reduced as a result of obtaining an additional avenue to provide/request required information/documentation.

Impact to Agency:

This will provide staff with an additional resource to contact the family and/or provide/request information.

Public Housing Admissions & Continued Occupancy Policy

Mandatory Revisions

- **PIH Notice 2010-3 (HA)** – Incorporate requirement that all household members contending eligible immigration status to provide documentation of a valid Social Security Number (SSN) within a certain time limit

Impact to Applicants/Participants:

Applicants/Participants will be required to disclose and submit evidence of SSN. Persons will not be able to receive assistance if this cannot be provided.

Impact to Agency:

Allows staff to validate applicant/participant identity, obtain employment and income information via computer matching programs, ensure duplicate assistance is not being paid, and enhances the use of HUD's Enterprise Income Verification (EIV) system.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Changes of Income** - Increases in income would be effective at the family's next regularly scheduled re-examination

Impact to Participants:

Participants will have the opportunity to save increased income for a longer period of time before adjustment in rent portion. Additionally, they may be able to utilize their increased income to assist with work related expenses such as attire, transportation, and childcare versus the increased income immediately being applied to their increased rent portion.

Impact to Agency:

The anticipated impact is to increase staff efficiencies by reducing the time utilized for processing changes, and reduce the use of paper products.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Reasonable Accommodation** - The need for an approved reasonable accommodation would not need to be re-verified annually unless the family moves or when there is another change in circumstances; quality control measures may be employed to randomly select participant accounts to ensure the integrity of the verification policy

Impact to Participants:

Participants will not be required to coordinate with appropriate entity annually resulting in expedited access to requested accommodation. Services for the participant may also be provided in a more efficient and timely manner.

Impact to Agency:

It is anticipated that the recertifications will be processed more expeditiously for participants as a result of a decrease in required documentation.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Life Threatening Conditions** – Include “No Utilities” as a life threatening condition for enforcement of housing quality standards (HQS)

Impact to Participants:

This increased measure will result in a healthier environment and the opportunity to be removed from a potentially hazardous atmosphere in a more timely manner.

Impact to Agency:

This will increase the level of client services that can be provided by enabling participants to be removed from a potentially hazardous atmosphere more expeditiously.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Thermal Environment** – Include functional air conditioner requirement for enforcement of HQS

Impact to Agency and Participants:

This increase in health precaution will provide a healthier environment in warmer periods of the year.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Informal Hearings** - Further define hearing procedures and responsibilities of the Hearing Officer

Impact to Participants:

It is anticipated that a clarification of the procedures and responsibilities of the hearing officer will provide participants with an enhanced knowledge of the hearing process.

Impact to Agency:

It is anticipated that a clarification of the procedures and responsibilities of the hearing officer will provide staff with an enhanced knowledge of the hearing process to better inform the participants.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Informal Conferences** – Add procedure to resolve questions and/or disputes that do not require an informal review or informal hearing

Impact to Applicants/Participants:

Applicants/Participants will be able to direct questions and/or disputes to staff through conference.

Impact to Agency:

Presents staff with the opportunity to address issues that do not require an informal review or informal hearing.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Joint Custody of Dependents** – Clarify policy when there is a dispute about which family should claim dependents; children who are subject to a joint custody agreement but live with one parent at least 51% of the time will be considered members of the household; the Agency may make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes

Impact to Applicants/Participants:

It is anticipated that a clarification will provide applicants/participants with an enhanced knowledge and understanding of the joint custody of dependents policy.

Impact to Agency:

It is anticipated that a clarification will provide staff with an enhanced knowledge and further ensure consistency of policy application.

Housing Choice Voucher Program Administrative Plan

PHA Discretionary Revisions

- **Project-Based Voucher (PBV) Program** –The PHA will operate a project-based voucher program using up to 20 percent of its budget authority for project-based assistance; the Agency will attach the funding to specific units rather than using it for tenant-based assistance

Impact to Applicants/Participants:

This will increase low income housing choices and provide an alternate form of housing assistance that is similar to the Housing Choice Voucher program. Because PBV-assisted households who want to move after one year have the right to the first available voucher, this program may result in longer wait times for applicants on the waiting list.

Impact to Agency:

This will assist the Agency in meeting its goal of deconcentrating poverty and expanding housing opportunities. PVB provides another mechanism for preserving and expanding SAHA's low-income housing inventory.

Housing Choice Voucher Program Administrative Plan

Mandatory Revisions

- **PIH Notice H 2009-11** – Incorporate determination if an applicant/participant and/or member is subject to a lifetime registration requirement under a state sex offender registration program

Impact to Agency and Applicants/Participants:

Applicants/Participants registered as lifetime state sex offenders will be unable to participate in the program.

Housing Choice Voucher Program Administrative Plan

Mandatory Revisions

- **PIH Notice H 2009-13** – Incorporate Form HUD-92006, Supplement to Application for Federally Assisted Programs, which provides applicants/participants the option to identify an individual or organization that SAHA may contact and the reason(s) the individual or organization may be contacted

Impact to Applicant/Participants:

It is anticipated that delays in processing accounts will be reduced as a result of obtaining an additional avenue to provide/request required information/documentation.

Impact to Agency:

This will provide staff with an additional resource to contact the family and/or provide/request information.

Housing Choice Voucher Program Administrative Plan

Mandatory Revisions

- **PIH Notice 2009-44 (HA)** – Incorporate that the use of unspent HAP funds in its NRA account will be considered prior to termination of assistance due to insufficient funding and that the financial analyst at the Financial Management Center will be contacted prior to termination actions due to insufficient funding

Impact to Agency & Participants:

It is anticipated that the number of participants terminated due to insufficient funding may be reduced as a result of unspent HAP funds in NRA account being considered prior to termination.

Housing Choice Voucher Program Administrative Plan

Mandatory Revisions

- **PIH Notice 2009-52 (HA)** – Incorporate the Protecting Tenants at Foreclosure Act (PTFA)

Impact to Participants:

For participants whose units are being foreclosed on, vacating unit prior to sale does not constitute "good cause" for terminating tenancy. Participants are also entitled to receive a 90 day notice to vacate from the new owner.

Impact to Agency:

The new owner of the foreclosed property will remain in contract with SAHA unless the new owner will use the property as their primary residence.

Housing Choice Voucher Program Administrative Plan

Mandatory Revisions

- **PIH Notice 2010-3 (HA)** – Incorporate requirement that all household members contending eligible immigration status to provide documentation of a valid Social Security Number (SSN) within a certain time limit

Impact to Applicants/Participants:

Applicants/Participants will be required to disclose and submit evidence of SSN. Persons will not be able to receive assistance if this cannot be provided.

Impact to Agency:

Allows staff to validate applicant/participant identity, obtain employment and income information via computer matching programs, ensure duplicate assistance is not being paid, and enhances the use of HUD's Enterprise Income Verification (EIV) system.

Capital Fund Program

- The current Capital Fund Program plan is based on a 2005 physical needs assessment conducted for all Public Housing properties.
- The capital needs for each Public Housing property are reviewed annually via meetings for the annual budgeting process with property managers, district managers and Directors of Public Housing.
- Capital needs are also presented to resident representatives to gather their input from the Public Housing properties.
- The capital needs items are prioritized, immediate need is placed in the first year (annual) plan and others are set into a Five Year plan.

Capital Fund Program

- ❑ Through HUD “fungibility,” capital items can be moved forward or to later years depending on the need of a particular property.
- ❑ SAHA staff participated in a physical needs study by HUD representatives in Fall 2009. Staff is awaiting guidelines to be revamped and released by HUD headquarters for Public Housing agencies to undertake Physical Need Assessments.
- ❑ SAHA staff will be soliciting for a Physical Needs Assessment for all its properties this year 2010.

Comment Period

- SAHA welcomes any comments or questions regarding proposed changes to the policies listed in this presentation.
- The Moving to Work plan for Fiscal Year 2010-2011 will be available for public review for 30 days, beginning February 08, 2010, at the Housing Authority of the City of San Antonio (SAHA) Main Office, 818 S. Flores, San Antonio, TX. (78204) or on the internet at <http://www.saha.org/aboutsaha/html/newspub.html>.
- The Plan includes the Admissions and Continued Occupancy Policy for the Public Housing Program, the Administrative Plan for the Housing Choice Voucher Program, the 2010 Agency Plan of Capital Budgets and the Moving to Work Plan.

Public Hearing

- A public hearing for the proposed plans is scheduled to be held on March 18, 2010 at 3:00 p.m. The meeting will be held in the Boardroom at the Housing Authority of the City of San Antonio (SAHA) Main Office, 818 S. Flores, San Antonio, TX, 78204.
- You may also submit comments by mail, email or fax to the attention of Monica Quiroga, Intergovernmental Affairs Liaison, no later than March 17, 2010.

Mailing Address: 818 South Flores, San Antonio, TX 78204

Email Address: Monica_Quiroga@SAHA.org

Fax Number: (210) 477-6127

Analysis

Staff will complete an analysis, as applicable, of recommended revisions, to be presented to the SAHA Board of Commissioners for final consideration.