SAHA 2025
Impact and Innovation Plan

SAHA developed the one-year MTW Plan as an integral component of a five-year rolling Strategic Plan. The new format was the result of a deliberate effort to more closely align the agency's various planning efforts. The annual MTW Plan is now documented as an appendix to the Agency's five-year strategic plan. Appendices A through E comprise the entirety of the 50900 requirements.

SAHA's new 5-year rolling plan will be updated in the third and fourth quarters of FY2020-2021. This will be the first update of the new plan. This update will be driven by a significant amount of new information, much of it from residents and partners.

Resident and Stakeholder Work Groups were convened for ten focus group meetings in September and October of 2020, to provide feedback on the agency's proposed outcomes. To supplement this small-group feedback, a mass survey was sent out to SAHA residents in October and November, generating over 500 responses. In January of 2021, a virtual symposium was held to stimulate discussion among external partners. One of the questions that the 25 panelists and nearly 400 attendees discussed was "Housing is a Human Right". While there was broad affirmation of the value, there was also a diverse range of implementation considerations.

Each of these engagement efforts generated significant feedback, both confirming and challenging elements of the plan. The plan update process over the coming months will systematically assess the following plan elements in light of all this new information:

1. Theory of Change
2. Guiding Statements (Vision, Mission, Impact)
3. Navigation: Outcomes, Indicators, Targets, Strategies
4. Impact: Neighborhood, Local Economy, Social
5. Performance Monitoring: Operational, Financial, Resident

Updated strategic plan elements will be documented in the new SAHA 2026 Plan in time for the new fiscal year that starts July 1, 2021.

For purposes of ensuring continued program administration under the Moving to Work demonstration, the Agency has finalized this year's FY2021-2022 MTW Plan (appendix to the strategic plan). The Annual MTW Plan describes the Agency's planned use of its Moving to Work flexibilities including MTW waiver requests and other required MTW information that will support the Agency's annual strategic implementation plan.

Document submission date:
Strategic Plan DRAFT Released For Public Comment: February 23, 2021
Strategic Plan DRAFT Submitted to HUD for review:
Final MTW Plan (Appendices A and B) Submitted to HUD for approval:
Final MTW Plan (Appendices A and B) Approved by HUD:

SAHA 2020-2021 MTW PLAN

SAHA 2025 Appendices A through F

Table of Contents

Section I. Introduction

OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES

Short-term goals and objectives include those that Plan Year. Long-term goals and objectives include those that the MTW PHA plans to accomplish beyond the current Plan Year. MTW PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives. If the MTW PHA includes non- MTW components, the MTW PHA should clearly delineate which are MTW and which are non- MTW goals and objectives. MTW PHAs have the flexibility to include references to proposed and ongoing activities in this section if it assists in providing an explanation about short-term and long-term goals and objectives. However, this is not required.

SAHA 2025 SUMMARY

The 2025 Strategic Plan describes the agency's priorities for the next five years. It also describes how those priorities connect to a shared understanding of the environment in which the agency works (theory of change), the impact of the agency's work on the broader community, questions that are critical to research, and annual implementation strategies.

GUIDING PRINCIPLES AND STATEMENTS

- **Vision**: Create dynamic communities where people thrive.
- **Mission**: The San Antonio Housing Authority Provides quality affordable housing that is well integrated into the fabric of neighborhoods and serves as a foundation to improve lives and advance resident independence.
- **Impact Statemen**t: San Antonio Area has a high quality of life where all are thriving

LONG-TERM OUTCOMES

The strategic plan focuses on priority 2025 outcomes for two key populations, SAHA Clients and SAHA Staff. Six outcomes have been identified as high priorities for the years 2020-2025:

- Two Staff-focused outcomes
    - SAHA staff respect and value diversity and inclusion
    - SAHA staff thrive in career and professional work

- Four Client-focused outcomes
    - A supply of affordable quality units exist in sufficient quantities for SAHA Clients
    - SAHA clients live in quality affordable housing
    - SAHA Clients feel safe
    - SAHA Clients have access to sufficient utilities

Section II. General Housing Authority Operating Information

A. Housing Stock Information

At the beginning of FY2021, the agency had a total of 6,083 units in inventory and is expected to close the fiscal year with 6,059 units. Below is the list of changes.

The Agency is projecting to have 5,938 units in the Low Income Public Housing Program (LIPH, also referred to as public housing) by the end of FY2022.

The Agency is also looking into the possibility of bringing online additional ACC units (PH) that are authorized and have not been assigned. It is the Agency's understanding that if and when these ACC units are assigned to a property owned or being developed by SAHA, the Agency's PH unit inventory would increase.

i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
Legacy at Alazan TX006000061	3	27	10	NA	NA	NA	40	General	3	NA

Total Public Housing Units to be Added in the Plan Year	**40**

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

If "Population Type" is "Other" please describe: NA

ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Blue Ridge/vf/sf/palm Lake TX006000036	**11** 11 (PL)	Mirasol - Westside Reinvestment Initiative / Homeownership
Springview TX006000031 [Building B, C, Replacement Home]	**32** 18 (Bldg B) 7 (Bldg C) 7 (Replacement Home)	Building B/C: Planned new development Replacement Home: Section 32 Program / HOPE VI - Springview Homes Disposition

Total Public Housing Units to be Removed in the Plan Year	**43**

iii. Planned New Project Based Vouchers (PBV)

SAHA plans to project-base forty-four (44) new housing choice vouchers in FY2021. If additional opportunities to project base housing choice vouchers at additional properties arise during FY2020, SAHA will report on any actions taken in a subsequent MTW Report.

Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
100 Labor (Name TBD)	**44**	**No**	**100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately $54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.**

Planned Total Vouchers to be Newly Project-Based	**44**

iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Gardens at San Juan	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	Leased / Issued	No	Final phase of Choice Neighborhood
Woodhill	35	Leased / Issued	No	Beacon Community - 10 support Next Step Housing Program (FY21-1 Activity) & 25 support VASH PBVs (Note: VASH PBVs are not funded through MTW and are only subject to specific MTW policies per HUD approval)
Rosemont at Highland Park	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)
St. John's Square	50	Leased / Issued	No	New downtown development - supports Time-limited Workforce Pilot Program (FY20-4 Activity)

Planned Total Existing Project-Based Vouchers	180

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. It is anticipated that the property will begin re-occupancy in June 2021 and be fully occupied by October of the Plan Year FY2022. Tenant Protection Vouchers (TPV) - a total of 69 TPVs are expected to be added to the voucher portfolio as a result of the public housing scattered site disposition.

vi. General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

The San Antonio Housing Authority's capital expenditures during the plan year will be dedicated to capital improvement projects, A/E related costs, construction management fees, and operating-administration costs throughout the public housing portfolio. The capital plans will address Life-Safety repairs, comprehensive modernization and substantial renovations at several public housing developments. Other capital projects may be added based upon the results of the physical needs assessment study which should be completed in 2021.

Planned Capital Improvements

Property	Budget	Description
Alazan	$ 130,000	Fire Damage Unit
Blanco	$ 228,227	Chiller Replacement and Upgrades
Madonna	$ 2,000,000	Boiler and Gas Line Replacement
Parkview	$ 580,602	Elevator Doors/Structural Exterior Repairs
Pin Oak I	$ 24,680	Elevator Repairs
San Pedro Arms	$ 31,005	Elevator Repairs
Villa Tranchese	$ 152,065	Asbestos Consultant Services
Victoria Plaza	$ 69,925	Fire Communication/Dept. Connection
Cassiano	$ 200,000	Foundation Repairs
Cross Creek	$ 114,000	Parking Lot Repairs
Highview	$ 161,200	Storm Drainage Repairs
Mirasol Homes	$ 1,209,800	Roof Repairs - Replacement
South San Apts.	$ 161,200	Drainage Repairs
T.L. Shaley	$ 280,000	Foundation Repair
Villa Veramendi	$ 950,000	Roof Repairs and Replacement

(1) Partial expenditures may carry over from FY19 to FY21..

B. Leasing Information

i. Planned Number of Households Served

As detailed in the table below, SAHA plans to serve **18,305 MTW households** in fiscal year 2020-21, through both public housing, MTW Housing Choice Vouchers, and other families served as part of activity FY2011-1e.

Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	69,172	5,846
MTW Housing Choice Vouchers (HCV) Utilized	147,708	12,309
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	2,532	211
Local, Non-Traditional: Homeownership^	N/A	N/A

Planned Total Households Served	**18,251**

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.
** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.
^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	N/A	N/A
Property-Based	FY2011-1e: Preservation & Expansion	2,532	211
Homeownership	N/A	N/A	N/A

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	The Agency is currently undergoing waitlist maintenance and evaluating the eligibility process. As a result, new processes may be implemented to improve success rates.
MTW Housing Choice	The Agency continues to select applicants from the waitlist to ensure MTW

Voucher	baseline is met. In addition, the Agency implemented a pre-eligibility process to increase the voucher utilization success rate.
Local, Non-Traditional	None.

C. Waiting List Information

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Section 8 Tenant Voucher	Voucher	5,622	Closed	Yes
La Posada Mod Rehab	Site-Based	23,918	Open	n/a
Prospect Hill Mod Rehab	Site-Based	1,517	Open	n/a
Serrento Mod Rehab	Site-Based	17,736	Open	n/a
Public Housing	Site-Based	39,450	Open	n/a
East Meadows Project Based Vouchers	Project Based Voucher Site Based	17,180	Open	n/a
Gardens at San Juan Project Based Vouchers	Project Based Voucher Site-Based	38,495	Open	n/a
Wheatley Park Senior Project Based Vouchers	Project Based Voucher Site-Based	393	Open	n/a
PBV Preferred Beacon	Project Based Voucher Site-Based, Referral-based	0	Open **(Referrals Only)**	n/a

Please describe any duplication of applicants across waiting lists:

Total number of unique applicants is 87,591 with each applicant averaging approx 2 waitlist applications

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Section 8 Tenant Voucher	The agency is planning to open HCV waitlist with a tentative date in late April 2021
La Posada Mod Rehab	None

Prospect Hill Mod Rehab	None
Serrento Mod Rehab	None
Public Housing	The Agency is planning to transition away from site-based / preferred development wait lists.
East Meadows Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Gardens at San Juan Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Wheatley Park Senior Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
PBV Preferred Beacon	The Agency is planning to transition away from site-based PBV waitlists.

Section III. Proposed MTW Activities

The Agency is not proposing any new MTW activities or significant changes to existing MTW activities.

Section IV. Approved MTW Activities

Below is a list of approved MTW activities and their general implementation status.

Current Activity	Status
11-1e- Preservation and Expansion of Affordable Housing	Ongoing
11-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	Ongoing
13-2- Simplified Earned Income Disregard (S-EID) (Public Housing)	Preparing to close out
13-4- HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Ongoing
14-2- Early Engagement	Ongoing
14-3- Faster Implementation of Payment Standard Decreases (HCV)	Ongoing
14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)	Ongoing
15-1- MDRC / HUD Rent Study	Ongoing
15-2- Elderly Admissions Preference at Select Public Housing Sites	Ongoing
15-3- Modified Project Based Vouchers	Ongoing
17-1- Time Limited Working Referral Program	Preparing to close out
17-2- Restorative Housing Pilot Program	Preparing to close out
19-1- Local Implementation of SAFMR	Ongoing
19-2- Alternate Recertification Process (PH and HCV)	Ongoing
20-1- College & University Homeless Assistance Programs	Early Implementation
20-2- St. Phillips College Homeless Program (SPC-HP)	Not yet Implemented/ On hold
20-3- Family Self Sufficiency (FSS) Program Streamlining	Ongoing
20-4- Time Limited Workforce Housing Pilot Program (PBV)	Not yet Implemented/On hold
21-1- Next Step Housing Program (THRU Project)	Ongoing
21-2- Limiting increases in rents	Preparing for Implementation

On June 13, 2019, the Agency received HUD approval to extend specific MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of these waivers in FY2020[1]. Below is a list of MTW activities apply to each program.

- FY2019-1: Local SAFMR Implementation
- FY2019-2: Alternate Recertification Process

[1] Because these MTW regulatory waivers have been extended to the HUD-VASH program, activity-specific reporting includes households served by the HUD-VASH program and who are subject to the alternative MTW policies, HUD-VASH program participants are not considered MTW households and HUD-VASH program funding is not eligible for MTW funding fungibility. As such, other MTW reporting elements including MTW statutory requirements (ie, MTW households served) and MTW sources and uses exclude HUD-VASH program participants and funding.

- 14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)

A. Implemented Activities

1. FY2011-1e: Preservation and Expansion of Affordable Housing

i. Plan Year Approved, Implemented, Amended

This activity was approved and implemented in FY2010-2011 MTW Plan.

ii. Description/Update

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The Agency has several projects in the development pipeline that will utilize MTW funding. (see Appendix E. Asset Management Plan for additional details on the Agency's preservation and expansion plans)

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

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

This activity operationalizes the expansion policies adopted in FY2011 by utilizing the local, non-traditional unit authorization under SAHA's broader uses of funds authority and securing the approval to combine RHF funds into the MTW block grant, which requires the Agency to construct new affordable units (defined as units reserved for households with income at or below 80% AMI).

While SAHA may develop new communities with market-rate units in addition to affordable units, this activity does not authorize the use of MTW funds (including RHF funds) for the development of those market-rate units.

Important to note is SAHA's flexibility to construct new Section 8 or 9 units that are authorized under MTW single-fund flexibility, and those outcomes are reported in the Sources and Uses of Funds section of this report (Section V.). The only units authorized under this activity FY2011-1e are those reserved for households with income at or below 80% AMI that receive no Section 8 or 9 funding.

This activity was revised for FY2016. Language describing Preservation and Expansion Policy context, background, and process was moved to Appendix 3. While the Preservation and Expansion Policy language can provide a helpful backdrop to the goals of FY2011-1e, it can also distract from the specific use of MTW flexibility. The language in FY2011-1e is now focused on the use of MTW funds to preserve or expand affordable housing units without any Section 8 or Section 9 subsidy. Since no preservation of non-Section 8 or 9 units is planned for FY2016, the metric "HC #2: Units of Housing Preserved" has been set to a benchmark of 0 (zero).

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2010-2011 and implemented in the same fiscal year. This activity has been amended as follows:

- FY2019-2020:
  - Added up to forty (40) additional tenant-based vouchers to support a Permanent Supportive Housing (PSH) provider currently partnered with SAHA administering the Move On Program.
  - Adopted alternative portability policies for all set-asides under this activity to ensure participants are able to continue receiving supportive services by partners while receiving the set-aside housing assistance. Under this alternative policy, recipients would not be able to port or take their SAHA set-aside voucher to another jurisdiction.
  - Adopted a hardship policy: a set-aside voucher recipient may be given the opportunity to port out of SAHA's jurisdiction in the following cases:
    - If the recipient has an approved reasonable accommodation need; or
    - If the recipient requests an emergency transfer request under the VAWA Act of 2013.

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio by increasing housing choices. The new Move On Program was launched in January 2020.

Description: SAHA allocates up to 240 tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside vouchers support two main programs:

- The Set Aside Homeless Voucher (SHVP) Program: The Set Aside Homeless Voucher Program (SHVP) provides rental voucher assistance to homeless individuals through a collaborative referral process. San Antonio Metropolitan Ministries (SAMMs) and the Center for Health Care Services (CHCS) screen applicants to ensure they meet all eligibility criteria and then forward referral packets to SAHA. A total of 200 vouchers have been allocated for the Set Aside Homeless Voucher Program (SHVP) program. Case management and supportive services are provided by CHCS and SAMMs.
- Move On Program: The Move On Program provides 40 tenant-based vouchers for families currently residing in Permanent Supportive Housing (PSH) to transition to subsidized housing. The program is designed to serve those who previously experienced chronic homelessness, been successfully served through PSH and will benefit from on-going housing subsidy to prevent a return to homelessness. Current partner is the South Alamo Regional Alliance for the Homeless (SARAH).

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

3. FY2013-2: Simplified Earned Income Disregard (SEID)

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2012-2013 and implemented in FY2013-2014. This activity has been amended as follows:

- FY2014-2015: Removed Family Self-Sufficiency (FSS) from the list of approved self-sufficiency programs due to the Agency's inability to reconcile FSS program requirements with this waiver.
- FY2015-2016: Established the requirement that families complete financial literacy classes.

ii. Description/Update

Update: The Agency is currently phasing out this activity during and may propose a new EID activity in a forthcoming MTW plan. Close out reporting to HUD is scheduled for FY2021 MTW Report.

Statutory Goal	Housing Programs	Additional Requirements
■ Self-Sufficiency ■ Cost Effectiveness	■ MTW Housing Choice Voucher ■ Public Housing	■ Must complete financial literacy classes ■ Must enroll in an approved self-sufficiency program ■ Current approved programs: ■ Westside Jobs Plus Program ■ Annie E. Casey/East side Jobs Plus Program ■ Self-sufficiency programs NOT approved: ■ Family Self-Sufficiency (FSS) Program ■ HUD Jobs-Plus at Cassiano Homes

This activity eliminated the traditional EID for all programs and established an alternative earned-income disregard (EID) for the MTW Housing Choice Voucher and Public Housing programs that requires enrollment in an approved self-sufficiency program. The alternative disregard expands the number of months for which EID (referred to as earned-income disregard or earned-income disallowance) is available from 24 months to 60 months, and makes the benefit available continuously during the 60 months, without start/stop. Head, Spouse or Co-head of Household qualifies entire household for SEID (formerly only Head of Household could participate).Income is disregarded on a sliding scale based on year(s) of participation:

- During year 1, 100% of earned income is disregarded
- Year 2: 80%
- Year 3: 60%
- Year 4: 40%
- Year 5: 20%

Participating households must attend quarterly financial counseling sessions in order to ensure that families are equipped with the tools and knowledge to budget effectively in preparation for the annual reduction of SEID, and to increase chances of success in achieving self sufficiency. At the time of the referral, staff schedules an appointment with financial counseling providers such as Family Service Association or the Financial Empowerment Center. Participating households must attend the counseling sessions prior to the annual incremental reduction of EID, or within one month of the reduction being processed. Staff have access to the appointment log, and sign in sheets for financial counseling, and a very good relationship with counseling partners to obtain information on attendance.

Case management Staff monitor attendance, and follow up with members to ensure they are on track. Should they fail to attend, staff report back to management when a member lapses. A hardship provision allows a grace period for unforeseen circumstances.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency is preparing to close out this activity.

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing. The Agency continues to experience cost efficiencies by conducting inspections of SAHA-owned nonprofits by SAHA Inspectors.

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

SAHA estimated that the impact to the Agency would be a cost savings of $55.46 per inspection. This figure was the projected result of replacing third-party contractors with in-house inspectors. At the time this activity was adopted, the cost of contracting with a third party to conduct 2,391 inspections annually was $182,478 per fiscal year, which translated into a cost per inspection of $76.32. The cost per inspection using SAHA staff was estimated at $20.86. The net savings per inspection was projected to be $55.46.

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

5: FY2014-2: Early Engagement (EEP)

i. Plan Year Approved, Implemented, Amended

This activity is designed to increase housing choices by providing training to support successful participation in SAHA's Federal Housing Programs, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. After a hold period of several months during FY2015, this activity resumed in FY2016. The pause in the activity was due to prioritizing lease-up over other considerations.

ii. Description/Update

Update: Effective March 16, 2020, the Agency implemented its Workplace Transition Plan, Transition Level 1, Emergency Operations. On June 22, 2020 the Agency transitioned to Level 2, Modified Operations. As a result, all EEP sessions were cancelled. The last EEP session was held in February 2020. In addition, the following actions have impacted this activity:

- Suspension of evictions for non-criminal activity
- Suspension of transfers, move-ins, and move-outs
- Suspension of all resident activities
- Suspension of terminations
- Modifications of voucher issuance for current and new clients
- Closure of Section 8 lobby and property management offices

Description: This activity establishes a requirement that applicants complete a defined set of courses upon admission to the Public Housing (PH) or Housing Choice Voucher (HCV) programs. Failure to attend a required EEP briefing may be cause for denial. The courses are designed to provide incoming families with the skills to be successful residents and tenants, while establishing clear expectations and minimizing the number of crisis situations over the long term. The curriculum is the product of formal partnerships with other agencies who participate as instructors or advisors in the design and implementation of the courses. Topics include finding the right home/neighborhood, working with landlords, financial literacy, fair housing, safety, upkeep and sustainability.

Elderly and disabled heads of households are exempt from the requirement, but encouraged to take the courses. Those who successfully complete the courses will receive a certificate.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

Remove the SAHA metric - "Percent of households who attended the program and subsequently exited the housing program for a negative reason (PH + HCV)".

During the deep dive discussions it became clear that EEP alone cannot reduce negative exits. SAHA is revisiting the EEP programing and will identify metrics that are better aligned with EEP's objectives, this may include tracking participant enrollment and participation in SAHA programs after attending EEP, housing stability for 6-12 months after EEP, etc.

Early Engagement lays the foundation of successful participation by informing clients of program requirements and introducing clients to SAHA and partner resources available. Early Engagement coupled with other preventive and intervention efforts may have a stronger probability of reducing negative exits. The agency will continue its deep dive to identify the appropriate preventive and intervention efforts to reduce negative exits and any relevant metrics associated with these efforts.

v. Planned Significant Changes

None

6. FY2014-3: Faster Implementation of Payment Standard Decreases (HCV)

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing. We are implementing the appropriate payment standard at regular reexaminations and at moves, but not at interim reexaminations.

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

7. FY2014-6: HCV Rent Reform (consolidates previously approved activities into one and renames it to clarify intent)

Previously approved

FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule

i. Plan Year Approved, Implemented, Amended

Both activities are designed to work together to reduce cost and increase cost effectiveness. For FY2014-6 Rent Simplification, the Agency received HUD approval as part of the FY2013-2014 Plan and began implementation in July 2014. For FY2015-4: Simplified Utility Allowance Schedule, the Agency received HUD approved as part of the FY2014-2015 MTW Plan and began implementation in January 2015.

This activity is designed to meet the statutory objective of increasing cost effectiveness, and was originally approved as part of the FY2014-2015 MTW Plan.

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

ii. Description/Update

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has two elements: (1) simplified rent calculation (previously approved under FY2014-6: Rent Simplification) and (2) simplified utility allowance schedule (previously approved under FY2015-4: Simplified Utility Allowance Schedule)

(1) Rent Simplification Description: Previously, rent calculation was based on 30% of the participant's adjusted monthly income. This activity lowers the percentage used to calculate rent to 27.5% of monthly gross income for all MTW HCV participants and new admissions, and eliminates deductions (i.e., medical and child care) with minimal impact to the participant's rent portion. Additionally, SAHA will not disregard the participant's income using the traditional Earned Income Disallowance (EID) calculation.

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

(2) Description: Prior to this activity, the Agency conducted annual reviews and periodically re-established a Utility Allowance Schedule to represents reasonable utility cost expectations as part of a tenant's lease. The Utility Allowance Schedule is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric).

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

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

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

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

The flat utility allowance will not be granted in the case of tenant-provided appliances, which are not considered tenant-supplied or -paid utilities. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

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

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

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

8. FY2015-1: MDRC / HUD Rent Study

i. Plan Year Approved, Implemented, Amended

This activity is designed to promote self-sufficiency, increase cost-effectiveness, and increase housing choices. It was originally approved as part of the FY2014-2015 MTW Plan.

ii. Description/Update

Update: This activity is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.

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

The goals of this alternative rent policy are to:

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

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

I. Description of Rent Reform Components

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

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

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

A. Description of the Rent Reform Activity

1) **<u>Simplified Income Determination and Rent Calculation</u>**

   Under the current HUD regulations, the total tenant payment (TTP) is a calculation derived from the voucher household's 30% adjusted monthly income (gross income less HUD prescribed deductions and allowances). SAHA follows a process of interviewing the household to identify all sources of income and assets, then verifies the information and performs the final calculation. The process is complex and cumbersome, which increases the risk of errors. According to HUD's Occupancy Handbook, Chapter 5 "Determining Income and Calculating Rent," the most frequent errors found across PHAs are: Voucher holders failing to fully disclose income information, errors in identifying required income exclusions and incorrect calculations of deductions often resulting from failure to obtain third-party verification. The complexity makes the HCV program less transparent and understandable by the public, landlords and voucher holders.

2) **<u>Elimination of Deductions</u>**

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

   a) <u>Percent Annual Gross Income.</u>

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

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

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

c) Review of Retrospective Income.

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

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

d) Capping the Initial Maximum Rent Burden

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

3) **Triennial Certifications**

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

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

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

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

a) SAHA interim certification will re-calculate the household TTP based on a new retrospective gross income review to determine the greater of 28% of the retrospective gross income or the minimum rent of $100. This retrospective gross income will establish the TTP that will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later.

b) At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective gross income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.

c) At the initial triennial certification only, if a household's childcare expense exceeds $200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the $200 per month, to create a "temporary" TTP for a six-month grace period. SAHA defines reasonable childcare costs as less than $3,000 per year for one child and $6,000 per year for two children. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.

d) The Study Group will be allowed one request per year for an interim certification to reset their TTP. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. The TTP will only be reset if a household's new retrospective monthly income (at the time of the request) is more than 10% lower than its most recent prior retrospective gross monthly income. If the limit on interim certification presents a hardship, the household will need to apply for a Hardship Exemption (See Section V below).

4) **Streamline Interim Certifications**

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

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

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

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

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

b) Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, SAHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. However, unless the request for move is due to a change in household composition, SAHA will not request income information or reset the household TTP until the sooner of the next scheduled triennial certification or tenant requested interim certification to reset TTP. SAHA will apply new utility allowance schedule, if any, to the household at the new lease effective date.

c) Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:

   - Change their contract rent,
   - Recertify and the TTP is recalculated during interim or triennial,
   - Move to new units, or
   - Change their household composition requiring a change in voucher size.

5) **Minimum Rent to Owner**

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

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

6) **Simplified Utility Allowance Schedule.**

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

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

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

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

Proposed Flat Utility Allowance

Bedroom Size	Flat Rate
0	$ 75
1	$ 94
2	$124
3	$174
4	$214
5	$277

6	$290
7	$333

II. Hardship Policy

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

A. Hardship Waiver Request Process.

The process for requesting a waiver will be as follows:

1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to Housing Assistant Specialist.
2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.
3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 90 days.
4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 10 day notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 10 day notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

B. Hardship Waiver Criteria

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

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

C. Hardship Review Process

1) The administrative review of the household circumstances will be conducted by SAHA according to current review processes.

2) For hardship claims related to imminent risk of eviction, SAHA will conduct an expedited hearing process.
3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing Agency's normal grievance procedures.
4) SAHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

D. **Hardship Remedies**

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

E. **End of Hardship Waiver Period**

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

III. Transition Period

A. **Selection of Participants**

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

- Vouchers not currently administered under the Moving to Work Program:
    - Veterans Affairs Supportive Housing (VASH)
    - Moderate Rehabilitation
    - Shelter Plus Care
    - Enhanced Vouchers
- HUD Project Based Vouchers
- Vouchers administered under portability
- Elderly households: Head of Household, co-head, spouse or single member households 62 years or older pursuant to the Administrative Plan
- Households headed by people older than 56 years of age (who will become seniors during the course of the long-term study).
- Disabled households: Head of Household, co-head, spouse or single member households with a disability as defined in the Administrative Plan
- Households currently participating in the Family Self-sufficiency Program
- Households participating in the Homeownership Program
- Households that contain a mix of eligible and non-eligible household members would not be included in the Study

B. **Enrollment of Study Group members**

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

2) During Certification Meeting

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

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

3) Mitigation of impact at initial triennial certification

   A "grace period" of six months will be provided to mitigate the impact of the transition for the following two cases:

   a) At the triennial certification at the beginning of the three-year period (and at subsequent triennials), if a household's current/anticipated income is less than its retrospective income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period.
   b) At the initial triennial certification only, if a household's childcare expense is above $200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the $200 to create a "temporary" TTP for a six-month grace period.

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

9. FY2015-2: Elderly Admissions Preference at Select Public Housing Sites

i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices for low-income families and was originally approved as part of the FY2014-2015 MTW Plan and implemented November 1, 2014.

ii. Description/Update

Update: This activity is ongoing and continues to allow the Agency to increase housing choices for elderly residents at selected public housing properties.

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

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

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

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

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

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

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

The current properties with the Elderly Admissions Preference are: Fair Avenue, WC White, and Lewis Chatham.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

10. FY2015-3: Modified Project Based Vouchers (MBPV)

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2014-2015 and implemented in the same fiscal year. It has been amended two times since implementation.

FY2019-2020 Amendments:

- Allocated eighty (80) additional project-based vouchers to support the follow initiatives:
  - THRU Project: Up to ten (10) modified PBVs at SAHA properties will be committed to support a local non-profit organization, THRU Project, in their mission to help foster youth aging out of the foster care system.
  - Family Homeless: Up to twenty (20) modified PBVs at SAHA properties will be committed to support the South Alamo Regional Alliance for the Homeless (SARAH). SARAH is the local Continuum of Care Lead Agency charge to create an improved service system that effectively provides support, coordination, and housing to all homeless populations within San Antonio and Bexar County, with a primary focus on moving individuals and families out of homelessness efficiently and permanently.
  - Beacon Communities or Partnerships: Up to fifty (50) modified PBVs at one of SAHA's Beacon or Partnership properties. These units will support a new workforce initiative as outlined in the proposed activity, FY2020-4: Time-Limited Workforce Housing Pilot Program.
  - Beacon Communities: Up to thirty (30) modified PBVs at a new SAHA - Beacon development. These units will support a new homeless college program as outlined in the proposed activity, FY2020-2: St. Phillips College Homeless Program (SPC-HP).
- Adopted an alternative waitlist policy for the modified PBVs committed that support the THRU Project, Family Homeless Initiative, Workforce Initiative, and St. Phillips College Homeless Program so that the units would be reserved for direct referrals from these partners. (24 C.F.R. 983.251: How participants are selected)
- Received waiver to remove the twenty-five percent (25%) per project cap for the Agency's modified project based units.

FY2020-2021 Amendments:

- Relocated ten (10) MPBVs previously approved under this activity to a new activity, FY2021-1: Next Step Housing Program (THRU Project).
- Removed the plan to commit 30 modified project based vouchers to support a college homeless program at a tiny home development. This development is no longer moving forward.
- Committed 44 modified project based vouchers at a new development. 100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately $54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.
- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Agency's Beacon Communities Portfolio. Due to lack of vacancies, the

Agency plans to allocate these vouchers across multiple properties to ensure they are utilized and occupancy needs are met.

- FY2020-4: Time-Limited Workforce Housing Pilot Program: Fifty (50) PBVs have been allocated to St. John's Square, a new property to be constructed under the Agency's Partnerships Portfolio.
- Received waiver to determine contract rents and increases and to determine the content of contract rental agreements that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. In alignment with the agency's goal to increase housing choice, this waiver also allows SAHA to analyze the MAFMRs and SAFMRs and use the higher payment standard on future MPBV contracts.
- Received waiver to remove the requirement that an independent entity must determine the initial contract rent and annual redetermination of rent. This waiver allows SAHA to determine the contract rent in accordance with PBV regulations. Current regulations require SAHA to rely on a third-party to initiate the HAP contract and adjust the rent at any request for rental increase. PBV regulations for determining rent to owner, on the other hand, specify that the amount of rent to owner must be set at the lower of:
    - an amount based off payment standard minus UA;
    - the reasonable rent (determined by a third party); or
    - the rent requested by the owner.

ii. Description/Update

Update: This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost effectiveness. This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing thereby increasing housing choices.

Description: This activity modifies the standard Project Based Voucher program in two ways.

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

SAHA may commit vouchers to any SAHA-owned or SAHA–controlled development. This activity applies only to commitment of vouchers to SAHA-owned or controlled units. Any commitment of vouchers to privately-owned developments will be made through a competitive process outside the scope of this activity.

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None.

v. Planned Significant Changes

None

11. FY2017-1: Thrive in Five Program (formerly referred to as Time-limited Working Household Referral Program)

i. Plan Year Approved, Implemented, Amended

This activity is designed to promote self-sufficiency and was originally approved as part of the FY2016-2017 MTW Plan and implemented in the same fiscal year.

ii. Description/Update

Update: The Agency is currently preparing to close this activity. In FY2020, the Agency initiated the development of an action plan to address low enrollment; however, as a result of the current pandemic the Agency has concluded the testing of a time limit, work requirement is no longer tenable and not in the best interest of our residents. The Agency is preparing close out activities and will report to HUD in the FY2021 MTW Report.

Description: This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, by providing working households in need of short-term housing assistance an opportunity to quickly access public housing units. This activity seeks to provide targeted assistance to a subset of households that 1) are working, and 2) would benefit from a period of increased housing stability to complete education/training, increase savings, or accomplish another self-sufficiency goal. These households will benefit from accelerated access to housing units, and, due to the time limit on the housing assistance, will transition out within 5 years. By focusing on households that have already started on the path to self-sufficiency, this activity should accelerate the number of households that actually transition to self-sufficiency during the period they receive housing assistance.

1. Overview

This activity provides time-limited public housing assistance to working households referred to SAHA by Workforce Solutions Alamo (WSA). Households referred to SAHA by WSA will receive five years of public housing assistance. If, at the end of five years, a hardship exists, two additional years of assistance are made available.

Upon starting housing assistance, participating households are required to enroll and participate in a SAHA self-sufficiency program such as Jobs-Plus or FSS.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2019-2). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

The total number of households to be served under this activity is currently capped at 200, and will be pulled in at a rate of 25 per quarter. Over 20,000 households are currently on the public housing waitlist. The 200 time-limited households represent 1% of that waitlist. As a result, providing these households with housing assistance will have a very limited impact on other households currently on the waitlist, especially at the draw rate of 25 per quarter. Additionally, it is expected that the time-limited units will turn over faster than standard units, creating more housing opportunities in the long run.

However, SAHA is taking steps to minimize any short-term negative impacts to non-participants. SAHA will reach out to households currently in waitlist pools whose applications indicate that they are working to notify them of the opportunity provided by this new program. Also, properties with extremely long wait times are being made unavailable to time-limited households, in order to not extend the already long wait times even longer.

2. Previous Pilot

Previously, a pilot project (MTW Activity FY2013-1) was approved as part of the FY2013 MTW Plan. The pilot ended in FY2016. FY2013-1 is now closed out and is replaced with this activity, FY2017-1. This activity builds on the lessons learned from the pilot. Some of those lessons included:

- The pilot activity relied on applicants self-identifying as working households during the application process. A wait list preference was provided to these applicants. However, many applicants that selected the working household preference were in fact not actually working. As a result, staff and applicants spent valuable time in initial meetings that did not result in successful placements. This new activity addresses this challenge by removing the preference. In its place, households will be eligible for a time-limited unit if they are referred by a partner workforce agency.
- Pilot households were required to participate in FSS or similar self-sufficiency activity, but did not always do so. Staff identified a number of factors, including: lack of clear communication and immediate follow up on the requirement, pilot households living in elderly communities (where there are no FSS or Jobs-Plus staff), and the novelty of the requirement (for both staff and applicants). The new activity addresses these factors by partnering closely with workforce partners who will assist in communication, as well as increased understanding of what training areas need to be emphasized.

Activity elements that remain consistent with the pilot include:

- Working households who participate in this activity will receive five years of housing assistance, with a two-year extension if needed based on hardship.
- Hardship policies mirror FSS practices and policies: SAHA can extend the term of the assistance up to 2 years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.
- FSS or Jobs-Plus participation is required -- each FSS and Jobs-Plus family receives case management services from a Case Manager who maintains close communication with the family and works with them to develop individualized plans. These plans establish specific interim and final goals to measure the family's progress toward fulfilling its obligations and becoming self-sufficient.

Changes and new elements that will be incorporated into the MTW Activity to improve program outcomes include:

- The pilot had been oriented to increasing housing choice and self-sufficiency. Now that this activity is referral-driven (instead of wait list preference-driven), the rationale for increasing housing choice by decreasing wait list time is no longer applicable. Instead, the activity will be focused solely on self-sufficiency.

- Households that participated in the previous pilot and remain in good standing will be rolled over automatically into the new program, and their time spent in the pilot will not count against the five-year time limit (the “clock is reset”)
- SAHA and WSA staff are developing a branding and communication strategy regarding the referral program
- SAHA staff will increase messaging of requirements and time limits backed up with strong written policies and procedures
- CDI and PH staff coordinate activities using a master tracking worksheet, that tracks the following:
    - Specific instances when the 5-year term limit is being communicated to participating households
    - If the family refuses to participate in FSS, CDI will inform PH staff, who will initiate eviction proceedings
    - Whether the household is meeting the financial counseling requirement
    - Household cohorts
    - New strategies employed as part of the Individual Plan development (for example, it was discussed that the goals should be focused on how much money it will take for the household to be able to pay flat rent by their 5th year)
    - Hardship tracking process, including all hardships requested
    - Improve methods to ensure families are complying with the rules of the pilot (including retaining employment throughout)
    - Develop a procedure for households moving to section 8

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency is preparing to close out this activity.

12. FY2017-2: Restorative Housing Pilot Program

i. Plan Year Approved, Implemented, Amended

This activity is designed to promote self-sufficiency and was originally approved as part of the FY2016-2017 MTW Plan and implemented in the same fiscal year.

ii. Description/Update

Update: The Agency is currently closing out this activity. The Agency has stopped receiving referrals. All probationers enrolled will maintain access to SAHA case management on a voluntary basis. All other program requirements will cease once the pilot program has ended. A full close-out report will be provided in the FY2021 MTW Report.

Description: This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, through resident services initiatives that provide eligible probationers and their families a public housing preference. This activity identifies a population of underserved residents – probationers – who currently face challenges securing stable housing. By providing a public housing preference, these households can more quickly establish a solid foundation from which to undertake subsequent reintegration and self-sufficiency goals

This activity is a two-year pilot program that will allow for up to 50 adult probationers who are reporting as part of the "Resurgence Collaborative" reentry initiative to have preference for housing on SAHA public housing properties. Probationers will be selected for application into the pilot by the Bexar County Community Supervision and Corrections Department (CSCD). Probationers in the pilot will receive dual case management support from the SAHA FSS Program and their Community Supervision Officer (CSO). The two-year term of the pilot program does not restrict how long residents will be able to continue to receive housing assistance.

The total number of households to be served under this activity is currently capped at 50. Over 20,000 households are currently on the public housing waitlist. Providing probationers and their households with housing assistance will have a very limited impact on other households currently on the waitlist.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2014-4). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

<u>1. Target Population</u>

Bexar County CSCD will select eligible probationers for the pilot based on the Texas Risk Assessment System (TRAS) in order to identify probationers with high housing "needs" and a relatively low risk of reoffending. Probationers identified with a high housing need and low risk will be screened by their CSO for SAHA's income requirements and disability status to determine their eligibility for SAHA assistance. If the probationer meets SAHA's income requirements they will be offered to apply for the Pilot via the Referral Form. The probationer's total criminal history will be taken into account for these risk assessments.

2. Criminal History Review

Probationers will be selected for application to the pilot by the Bexar County Community Supervision and Corrections. Only Bexar County adult probationers currently serving a probation sentence for an allowable offense (Class B misdemeanor, nonviolent Class A misdemeanor, lowest-level controlled substance possession offense, or a first-time burglary offense) will be eligible for the pilot program. Probationers concurrently serving three or more separate probation sentences for allowable offenses or a single probation term for three or more allowable offenses will be ineligible for the Pilot. An exemption to current SAHA Screening and Eviction Guidelines will be required to allow some participants in the Pilot population to avoid automatic denial.

Probationers with a criminal history that includes narcotics distribution, violent felonies, or multiple burglary offenses at any time will be ineligible. Probationers with any allowable offenses within the past five years for which they are not currently serving a probation sentence for will also be ineligible unless the probationer successfully completed a probation sentence(s) for the offense(s) in question. Federal bans on sex offenders and persons convicted of drug manufacturing on federal property remain. In addition, people previously evicted from federally-assisted housing or who have committed crimes on SAHA property in the past will be ineligible for the Pilot.

3. Dual Case Management

Probationers selected for the pilot will be dual-case managed by a SAHA FSS Case Worker and their CSO. FSS will attempt to use only one or two case managers for the Pilot population as will the Bexar County CSCD. Selected probationers must be willing to engage in FSS case management for up to 5 years and if they unilaterally terminate case management they may be evicted. Selected probationers in the Pilot will receive a FSS case manager upon entering public housing, and the FSS case manager's role will be to supervise and motivate clients in conjunction with the CSO. Bexar County CSOs will have the final say on what court-ordered services must be completed and in what order, though the FSS case manager and CSO should coordinate and jointly agree on non-court ordered services and supervision. Selected probationers will be required to report to a CSO at the Barbara Jordan Center location in order to utilize services at the Resurgence Collaborative.

The SAHA FSS Case Manager would work to be present and present materials at SAHA-based hearings related to a Pilot participant; the Bexar County CSO would handle criminal and court-related matters pertaining to offenses probationers in the Pilot may commit. Both case managers should coordinate efforts and meet on at least a monthly basis to review problem cases and problem-solve.

The FSS Case Managers will also coordinate with property managers to address problems as needed. Scheduled meetings with clients do not have to be attended by both managers but efforts and communication should be coordinated so as not to confuse or mislead clients. SAHA will track the results of this Pilot with Bexar County CSCD through the FSS program.

4. Pilot Requirements

The probationers must also stay in good standing with their probation requirements (including substance monitoring and home inspections). Probationers rearrested for violations of their current probation or new criminal offenses may be swiftly evicted from public housing and removed from the lease if determined by their CSO and SAHA. Family members would not be subjected to eviction if another adult in the household is capable of taking over the lease, unless otherwise determined by SAHA and the Bexar County CSCD.

Pilot Probationers who must go to residential drug treatment will not forfeit their public housing unit provided they have other immediate family members already living in the unit and capable of maintaining the lease. Probationers exiting residential drug treatment would still be able to apply to the pilot, if all other eligibility requirements are met. An MOU will be created for the Pilot to share information between SAHA and the Bexar County CSCD. In addition to the MOU the participating probationers will be required to sign a release of information form in order for the CSCD to share any case specific information (i.e. drug tests) with the SAHA case manager.

Probationers who are evicted due to an arrest or violation will be ineligible to apply for the Pilot in the future. Evicted probationers' spots in the Pilot will be recycled into the population cap for each pilot program. The same will apply for those probationers who leave public housing either voluntarily or through increased self-sufficiency. Individuals who finish their probation requirements may still be required to meet with a FSS case manager, and their spot will be recycled into the Pilot population cap.

Probationers will be required to obtain services at the "Resurgence Collaborative" at the Barbara Jordan Center determined by their FSS case manager and CSO. Services not provided at the Resurgence Collaborative may be completed through FSS/Probation's existing network of services providers. In addition, the FSS case manager will work to engage family members in services offered at the Resurgence Collaborative to build self-sufficiency in the entire family.

5. Pilot Logistics

Up to 50 probationers reporting as part of the "Resurgence Collaborative" reentry initiative and their immediate families will be allowed prioritized access to public housing at SAHA properties over a two-year period. The population cap of 50 will include both probationers coming into new public housing units with their families and probationers who are being allowed to move in with immediate family members that are already living in public housing properties.

Probationers selected for the Pilot will be given a signed referral from their CSO to present to SAHA staff at the Unified Application Center. The Referral Form will be created specifically for this Pilot and will be based on similar referrals for other SAHA special populations/projects. If probationers apply to the Pilot and their term of probation expires before a spot in the Pilot becomes open, their Referral will expire and they will have to reapply to obtain SAHA housing assistance. Probationers who commit a crime after being accepted into the Pilot but before moving into their unit will be removed from the Pilot.

6. Outcomes

According to 2012 Byrne CJI Grant Implementation Plan Data collected by Trinity University, the Choice Neighborhood footprint (location of the Resurgence Collaborative), offenders in the footprint have higher rates of recidivism (re-arrests) and a higher arrest rate. The number of people per ZIP code on probation in the footprint is twice that compared to other ZIP codes in

Bexar County. Additionally 52% of probationers who live in these ZIP codes had their probation revoked instead of completed, compared to 41% for Bexar County as a whole. Focus groups conducted by Trinity University with probationers also found that transportation is one of the most significant barriers for probationers. Together this baseline data illustrates that the Choice Neighborhood has a higher percentage of probationers, these probationers struggle with basic needs such as transportation, and these probationers have their probation revoked or re-offend at a greater rate than Bexar County as a whole.

The program is anticipated to reduce recidivism among probationers. The prioritized access to housing in the Pilot will also allow SAHA to determine the effect of immediate housing on probationers in regards to such measures.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency is preparing to close out this activity.

13. FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2018-2019 and implemented in the same fiscal year.

- FY2018-2019: Phase I was approved and implemented
  - Established 2-Tier Policy Map
  - Set a subsidy cap of $1.5M for higher cost areas
  - Set payment standard schedule outside the 90-110% of the MAFMR and SAFMRs
  - Established an exception overlay
- FY2019-2020: Phase II was approved and implemented
  - Expanded the number of small areas from two (2) to ten (10),
  - Eliminated the subsidy cap from Phase I,
  - Set payment standard schedule outside the 90-110% of the MAFMR and SAFMRs, and
  - Updated the exception overlay mechanism.

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to increase housing choices. Phase II was implemented for new admissions and movers effective January 1, 2020 and recertifications effective February 1, 2020.

Description: This activity is designed to achieve the MTW statutory objective to increase housing choices for low-income families, by creating payment standards that better reflect market conditions in different parts of San Antonio, and so making a larger number of San Antonio neighborhoods affordable for voucher households. This activity is a local implementation of HUD's Small Area Fair Market Rents (SAFMR).

Because of the potential impact (positive and negative) on a large number of voucher households, SAHA implemented the activity over multiple fiscal years in order to control for negative and unanticipated consequences, to make use of the latest research and market data, and to maintain the number of households served. HUD approved this phased-in approach in FY2019. Below are the principles and parameters the Agency used in the development of the activity:

1. Maintain Number of Households Served
   a. No decrease in capacity to serve the same number of households
2. Minimize Negative Impact
   a. Minimize negative impact for existing households in low-cost neighborhoods
   b. No disparate impact on protected classes, including locally recognized classes (sexual orientation, gender identity, veteran status, and age)
3. Make the SAFMR as easy to use as possible
   a. Households and landlords have limited time and resources; program design should facilitate program implementation
4. Leverage the Value of the Voucher

    a. Maximize value of vouchers in targeted growth areas and rapidly changing neighborhoods

Local Submarket Payment Standards: This activity makes use of one waiver: establish local submarket payment standards.

Currently, the Department of Housing and Urban Development (HUD) publishes fair market rents (MAFMRs) annually for each metropolitan statistical area in the United States and requires each housing authority to adopt a payment standard schedule for each MAFMR area in its jurisdiction. HUD allows housing authorities to establish the payment standard amounts at any level between 90% and 110% of the published FMR. Payment Standards are used to calculate the maximum subsidy that the PHA will pay each month toward rent and utilities for families with Housing Choice Vouchers.

Prior to the implementation of SAFMR, the process for establishing payment standards includes analyzing the published MAFMRs when published, presenting the recommended schedule to the Board of Commissioners for approval, and implementing the new schedule over a twelve month phase-in for clients that have a reexaminations and all new admission contracts effective on or after the effective date. Due to biennial and triennial recertifications under the agencies MTW status, the impact to HAP expenditures are typically phased-in over a period of three years.

Under the new Small Area Fair Market (SAFMR) regulation, the San Antonio Housing Authority is required to implement this process using SAFMRs which are based on ZIP codes as opposed to the San Antonio-New Braunfels Metropolitan Statistical Area; however, because the Agency is designated as a Moving to Work (MTW) Program, it is authorized to adopt and implement any reasonable policy to establish payment standards for housing choice vouchers that differ from the currently mandated program requirements. The Agency requested and received a waiver in Year 1 (FY2018-2019).

On June 27, 2019, the Agency received HUD approval to extend this MTW Agreement provision to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

To stay consistent with the annual payment standard update approval process, new payment standard schedules will be approved by a separate Board Resolution. Annual modifications to payment standards are allowed with SAHA Board approval where appropriate/necessary. The Agency anticipates reviews of the payment standards every year in August/September when new SAFMRs are published by HUD.

Zip Code Grouping methodology: The Agency explored a variety of grouping options ranging from five to fifteen groups using a cluster analysis based on the published HUD SAFMRs. The goal of the clustering was to minimize within tier rent differences and maximize between tier differences. This would ensure that when the payment standard was set for each tier, it would be an appropriate amount for all zip codes within the tier. The ten tier option was chosen after considering administrative burden, financial impact, and after building consensus with local stakeholders. In addition, the Agency had implemented HUD's SAFMR for its smaller special programs using ten (10) tiers - which offered some consistency for staff, clients, and landlords. As of FY2020, special programs are now under SAHA's MTW implementation of SAFMRs. .

Payment Standard methodology: The Agency reviewed various methods for setting the payment standard in each Tier. The goal of the review was to establish a method that allowed the Agency to consistently determine payment standards for each tier and bedroom size while also balancing the financial impact. The method that found the balance between the financial impact and the goals of the SAFMR policy was determined to be ninety percent (90%) of the minimum SAFMR within each Tier. For example, in Tier 1 there are seven (7) ZCTAs. The minimum or lowest SAFMR for a two-bedroom among these seven zctas is $790. The payment standard for the two-bedroom is set to ninety percent (90%) of $790, or $711. This method was applied to all ten tiers and all bedroom sizes.

Exception Overlay methodology: The intent of the exception overlay is to establish a mechanism that provides greater flexibility to adjust payment standard schedules to mitigate involuntary displacement in rapidly changing markets and/or coordinate support for place-based redevelopment or revitalization initiatives (such as Choice Neighborhood). The overlay can include entire ZIP codes or smaller geographies such as census blocks, tracts, and locally defined neighborhoods. Areas are selected based on timely market information and other local information that support the need for a higher payment standard.

The Agency established an exception overlay in FY2018 that consisted of seven (7) ZCTAs. These areas were selected after reviewing a City of San Antonio report on housing vulnerability that highlighted areas where property values had risen the fastest in the city.

As part of the update to Phase II, the Agency reviewed additional available data including change in land value, home value, gross rents and determined that only minor updates to the current overlay were justified. Two ZCTAs (78215 and 78235) were removed from the overlay because there were no voucher holders. Thus, the need for involuntary displacement of existing voucher clients is not appropriate; rather, the goal for these ZCTAs is to make them more accessible to new clients through the new tiered system. Both ZCTAs are now in tiers with substantially higher payment standards than the current payment standards.

The Agency has also developed a list of ZCTAs that are anticipated to experience market pressures in the near future. As an early warning mechanism, these areas will be monitored closely during Phase II in addition to the relief provided under the exception overlay policy. The Agency may conduct targeted market studies to determine if any area needs to be added to the exception overlay and/or moved to a higher payment standard tier.

Hardship policies: This activity is not expected to impact existing clients tenant share; however, the Agency recognizes the need for a hardship policy in concert with the proposed policy changes to ensure that households with documented urgent needs or extenuating circumstances are not unduly burdened by the policy changes.

SAHA's current policy on financial hardships regarding minimum rent and zero income declaration will continue to apply to participants under this activity in accordance with §6.3.A(3) and §6.3.B of the Administrative Plan. In addition, the Agency has two MTW activities with special hardship policies: FY2014-6: Rent Simplification and FY2015-1: MDRC/HUD Rent Reform Study. Hardships outlined in those activities will apply under this activity. Please refer to the MTW activities listed above in Section 4 of this plan for specific hardship criteria. Unless otherwise noted, all elements are applicable for all three activities.

The agency has adopted two SAFMR-specific mechanisms to provide protection for clients including (1) Hold Harmless Policy and (2) Exception Overlay Policy. In addition, clients have access to existing hardship and reasonable accommodation policies outlined in 16.2.B(7) of the Administrative Plan. The mechanisms specific to SAFMR are described below.

Hold Harmless Policy: For families whose payment standard falls outside of the basic range as a result of a decrease in FMRs (including a decrease in FMRs due to the implementation of Small Area FMRs), SAHA will not reduce the payment standard amount for as long as the HAP contract remains in effect.

Exception Overlay Policy

A. **Exception Overlay Policy:** Households will receive automatic exception overlay relief, as discussed below, if:
    a. The household is currently under contract for a unit located in the Agency's exception overlay.
    b. The landlord requests an increase in the rent amount after the first contract year and the new contract rent is determined to be reasonable through the Agency's rent reasonableness process.
    c. The household's new total monthly family contribution as a percent of household income (rent burden) increases by more than 10% from the current rent burden and the household realizes it's unable to afford their rent portion as a result of the increased contract rent.
    d. The new monthly increase is not a result of a change in household circumstances.

B. **Exception Overlay Policy Remedy:**
    a. SAHA will cap the total monthly family contribution at the current amount for the remaining months in their current lease term.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

14. FY2019-2: Alternate Recertification Process (PH and HCV)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by providing an alternate schedule for the annual reexamination process, specific PH review procedures, and certification methods of income and assets. The use of oral verifications reduces SAHA's administrative costs for postage, paper and envelopes when mailing written third party verification to the client's employer. The activity was approved in the FY2018-2019 MTW Plan and implemented in FY2018-2019.

ii. Description/Update

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has three main components that are designed to streamline and simplify the recertification process: (1) alternate schedule, (2) alternate public housing review procedures, and (3) alternate income verification methods. It consolidates and updates three previously approved activities related to the first two elements (FY2014-4 Biennial Reexaminations, FY2014-5 Triennial Reexaminations, and FY2016-2 Biennial and Triennial Notification of Rent Type Option) and adds a new waiver for the third element.

(1) **Alternate Recertification Schedule (PH and HCV)**

This proposed activity establishes biennial and triennial schedules for reexaminations for the low income public housing and housing choice voucher programs. The Agency has been using alternative schedules since 2011; this new activity streamlines the schedules across both programs. The effective change will move approximately half of public housing households from biennials to triennials; the other half of public housing households will remain on the biennial schedule. The housing choice voucher program will continue current biennial and triennial reexamination schedules.Every household will have the option of interim reexamination if there is a change in household composition or income according to HCV and PH policy.

Beginning FY2016, SAHA created a local form with an expiration date of 39 months to replace the HUD-9886 Form with its 15 month expiration date. In the future, SAHA may create its own local forms with different expiration dates or other elements to accommodate this activity.

Definitions: For purposes of assigning a recertification schedule to each household, the Agency will utilize the following to apply the two schedules:

Triennial: A household is eligible for a triennial schedule if the household has at least one elderly or disabled household member and the household receives 100% of their income from fixed sources. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.
Biennial: Households not eligible for a triennial schedule are eligible for a biennial schedule.

(2) Alternate PH Review Procedures (PH only)

Typically in the low income public housing program, PHAs are required to inform public housing residents of the option of paying income-based rent or a flat rent on an annual cycle. Additionally, PHAs are obligated to conduct annual updates of family composition for these public housing families who have chosen to pay flat rent regardless of HUD-allowed triennial recertifications for those families.

As residents move to biennial and triennial recertification schedules, it becomes more efficient to coordinate notification and update requirements in accordance with their new recertification schedules. Therefore, SAHA proposes to conduct review procedures related to flat rent notice and family composition updates for PH individuals at the time of reexamination.

(3) Alternate Income Verification Methods (PH and HCV)

Currently, SAHA accepts self-certification for assets valued below $5,000. In order to further streamline administrative processes, SAHA will accept the family's self-certification of the value of family assets and anticipated asset income for net assets totaling $25,000 or less. Third-party verification of assets is still required for assets totaling a value more than $25,000.

According to HUD's Verification Hierarchy, SAHA must send a form to third-party sources for verification of income if the tenant-provided documents are not acceptable or are disputed. In order to increase the rate of files completed in a timely manner, SAHA will skip the third-party verification form and instead use oral third party verification when tenant-provided documents are unacceptable.

In addition to streamlining methods of document verification, SAHA wanted to reduce the number of applicants re-submitting documents for approved extensions of voucher (if in HCV Program) and/or reasonable accommodations. SAHA has revised its policy to extend the length of time that applicant-provided documents would be valid for verification purposes. Applicant-provided documents dated within 90 calendar days from the eligibility appointment would be valid. This does not apply to permanent documents such as social security cards, birth certificates, and identification cards.

Both methods will apply to the low income public housing and housing choice voucher programs, unless explicitly exempted.

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

15. FY2020-1: College & University Homeless Assistance Programs (formerly Palo Alto College, College Homeless Assistance Program)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan and implemented in the same fiscal year.

ii. Description/Update

Update: This activity is in early implementation and initial recipients are expected to be leased by the end of FY2020.

Description: The activity supports the creation of a homeless set-aside program(s) in partnership with local college(s) and university(ies) to address the local housing needs of homeless college and/or university students.

The Agency is tackling this local housing need with a tenant-based set-aside voucher. Because these set-asides will have time limits, alternative eligibility requirements, and are married to homeless college/university pilot program(s), they are being proposed separate from the Agency's set-asides allocated under FY2011-9.

This activity allows the Agency to initially set-aside up to 20 tenant-based housing choice vouchers for households referred by Palo Alto College (PAC) and 30 tenant-based housing choice vouchers for St. Philip's College. The Agency may set-aside additional vouchers to support additional college(s) and/or university(ies) who enter into a partnership with the Agency.

Students seeking housing vouchers through the Homeless Assistance Program(s) must meet criteria outlined by the partner agency. Partner Programs may have slightly different college/university program eligibility requirements. Eligibility for SAHA housing will remain consistent across all programs. Students must adhere to both sets of requirements.

Students receiving housing assistance through this set-aside must meet SAHA eligibility criteria for income levels, background check and lawful residency. Students will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), MTW alternative payment standard schedules (see FY2019-1: Local Small Area Fair Market Rent Implementation), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)). Students have up to one semester after graduation to secure housing at which point students are no longer eligible for the housing voucher.

In addition, this proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;

- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

1. a local educational agency homeless liaison
2. the director of a program funded under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director; or
3. a financial aid administrator.

Rental leases executed under this program will follow standards as regulated by Section 8(o)(7) of the housing act and 24 CFR 982.308-982.310. While the Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

iii. Planned Non-Significant Changes

The Agency is currently working with a local community college to implement an additional College Homeless Assistance Program at additional campuses. The program will be consistent with the framework originally set out in this activity operating within the current waivers approved in FY2020.

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

16. FY2020-3: Family Self Sufficiency (FSS) Program Streamlining

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by creating administrative efficiencies in the Family Self-Sufficiency Program. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: This activity has been implemented. Due to recent changes in HUD regulations, the Agency is no longer tracking the elimination of the 120 day rule under this activity.

Description: The overall goal of this activity is to create operational efficiencies that will maximize engagement in the FSS program. The Agency is requesting the following:

1. Modify FSS Contract: The Agency is proposing to modify the FSS contract to align its policy in its Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. Currently in the Agency's HCV program, a participant's TTP is calculated per the approved MTW activity, FY2014-6 Rent Simplification. This FSS-related waiver would allow the Agency's FSS contracting process to be consistent with current and future PH and HCV alternative rent policies.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

17. FY2021-1: Next Step Housing Program (THRU Project)

i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices. The activity was approved in the FY2020-2021 MTW Plan.

ii. Description/Update

Update: This activity has been implemented and is ongoing.

Description: The housing assistance provided by the Agency is intended to allocate vouchers to youth aging out of foster care who are at risk of homelessness. The voucher provides the youth the ability to lease decent, safe, affordable housing in the private housing market.

Partner Program Overview

THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness[2]. It will offer housing options and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth, in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and ultimately our most basic need; shelter. Each placement will focus on preparing the youth for living on their own while strengthening future families and breaking the negative cycles.

The THRU project will provide a range of services, including:

1. Housing search assistance
2. Life-skills course
3. Home visits by case manager
4. Access to employment specialist
5. Participants are also required to save a percentage of personal income, on a sliding scale, so that at the end of the one year they have at least $2,500 in savings

Activity Overview

Currently, ten (10) modified project based vouchers have been allocated and committed to Woodhill Apartments to support this partnership as approved under FY2020 amendments to the FY2015-3 Modified Project Based Vouchers activity. To date, there have been no successful placements. After a post-implementation review, the Agency and partner have identified program design changes that require additional MTW waivers.

SAHA is proposing to contribute up to 36 months of housing assistance to support youth being served by the Next Step Housing Program. Below is a summary of how SAHA's housing assistance will provide support.

Year 1 (12 months)

[2] Youth may currently be in extended foster care.

- Youth are enrolled in the Next Step Housing Program and receive housing assistance from SAHA through a modified project based voucher at Woodhill Apartments.
    - Youth will have rent calculated as prescribed in FY2014-6 Rent Reform and will also have their portion capped at $100 -- SAHA will cover any additional tenant rent portion with increased housing assistance.
    - Youth will have access to the modified project based unit and rent cap for one year only.
    - SAHA will also waive the initial rent burden rule which states that when a family initially leases and the gross rent of the unit exceeds the applicable payment standard for the family, the dwelling unit rent must not exceed 40 percent of the family's adjusted income.

Years 2 and 3 (24 months)

- Once youth complete the first year (12 months) Next Step Housing Program, they will have the option of continuing on housing assistance with a traditional tenant based voucher provided by SAHA.
    - Youth must be recommended by the partner for continuance in the voucher program
    - Youth will have access to the tenant-based voucher for an additional 24 months and will benefit from the choice to remain at Woodhill Apartments or move to another housing unit within SAHA's jurisdiction.
    - Youth will have their tenant rent portion calculated as prescribed in FY2014-6: HCV Rent Reform (consolidates previously approved activities FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule) and will NOT have their portion capped at $100.

Alignment with other MTW activities

- Due to the nature of the program, youth will have an annual recertification every 12 months and will not follow alternative recertification processes established under FY2019-2: Alternate Recertification Process (PH and HCV).
- Youth admitted under this activity will follow the Agency's alternative implementation of small area fair market rents as established under FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

B. Not Yet Implemented Activities

1. FY2020-2: St. Phillips College Homeless Program (SPC-HP)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: This activity is not implemented. Due to current development limitations, the Agency is pursuing this partnership under FY2020-1 College & University Homeless assistance programs to meet immediate housing needs. The Agency continues to work on new development planning to determine whether the project-based voucher model can be pursued.

Description: The activity supports the creation of a homeless set-aside program in partnership with a local community college to address the local housing needs of homeless college students.

This proposed activity would allow the Agency to attach the new program to modified project-based units at a new SAHA development. The units at the new development will be limited to homeless college students referred by St. Phillips College (SPC).

The SPC program has the following elements:

(1) Housing: SAHA will provide rental assistance or housing for up to 30 SPC students and dependents who are homeless or near homeless[3]. The rental assistance would be limited to three years.

(2) Education: Students must (1) remain enrolled in 12 or more academic credits and otherwise make adequate academic progress toward a degree (SPC will track the adequacy of the student's progress); (2) maintain GPA above 2.5 to maintain housing assistance; (3) complete 64-80 of community services hours per semester; and (4) participate in support services provided by SPC.

(3) On-Campus Support: SPC will administer the homeless college student program to include managing a program waitlist, providing SAHA the referral, assisting the student through the leasing process, tracking academic progress, and providing supportive services during the students' tenure in the college program.

This proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;

[3] Students and their families must meet HUD's definition of homeless (which encompases the US Department of Education's definition of homeless). In addition, student eligibility rules as outlined in 24 CFR part 5, subpart F would remain applicable.

- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

1) a local educational agency homeless liaison
2) the director of a program funded under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director; or
3) a financial aid administrator.

Rental leases executed under this program will follow standards as regulated by Section 8(o)(7) of the housing act and 24 CFR 982.308-982.310. While the Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

Local Need Identified: The Alamo College District is a community college system with campuses located throughout the San Antonio area. Populations of homeless students have been identified, some sleeping in their cars in college parking lots at several campuses. Over 300 homeless and/or youth aging out of foster care students are currently enrolled at ACD, which is approximately 2.3% of students enrolled. St. Phillips College (SPC) is a community college located in the San Antonio neighboring several of SAHA existing housing communities as well as SAHA undeveloped land parcels. It is also located within the federally designated Eastside Promise Zone (EPZ).

St. Philip's College was founded in 1898 in San Antonio by the Episcopal Diocese of West Texas. The College has evolved from its humble beginnings as an industrial school into a fully accredited two-year institution of higher education serving a diverse student population. The College has expanded to include two campuses -- Martin Luther King Campus (MLK) and Southwest Campus (SWC). It is the only institution of higher learning in the nation officially designated as a Historically Black College and Hispanic serving institution.

Becoming Part of a Local Solution: SAHA is currently working on a robust housing expansion plan (see Appendix 5.2) and would like to leverage those plans to help address a local housing need that has been identified by its partners. There are several SAHA-owned undeveloped land parcels near the St. Phillips College that could support a new development with dedicated modified PBVs.

Through the Agency's current modified PBV activity (FY2015-3) the Agency plans to commit up to thirty (30) project-based vouchers as part of future development. The proposed activity below outlines the homeless college student program that will be supported by the modified PBVs.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency is currently working with the partner to implement a College Homeless Assistance Program using the framework set out in FY2020-1.

2. FY2020-4: Time-Limited Workforce Housing Pilot Program (PBV)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to promote self-sufficiency by providing on-site supportive services that promote self-sufficiency. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: This activity has not been implemented and is currently on hold pending the new development process for St. John's Square.

Description: This pilot is supported by the Agency's current modified PBV activity (FY2015-3) through a commitment of fifty (50) project-based vouchers at St. John's Square.

The pilot project (max 50 households) for working residents provides time-limited housing assistance at selected sites where MTW modified PBVs have been committed. Working households at 50% of the area median income and who do not exceed 80% of the area median income, who choose to apply would receive five (5) years of housing assistance, with a two year extension if needed based on hardship.

SAHA will partner with SA Works to help provide a pipeline of both employers in the area and individuals to fill the units. SAHA would work directly with SA Works and the participating employers to not only ensure the units are filled, but also to create a career path for program participants. A separate waitlist would be created for those individuals who qualify for the program.

SAHA will work with the following partners to implement this initiative: local workforce partners (Project Quest, Goodwill Industries, Workforce Solutions Alamo), local employers (such as hospitals, restaurants, hotels), and a local developer. The partners will execute an MOU that outlines the roles and responsibilities for each party.

SAHA will also hire a Resident Services Coordinator to work with and mentor program participants to improve retention and success rates for the program. This position will be funded through the operations of the development at a cost of $60,000 a year to include benefits.

Hardship policies: SAHA can extend the term of the assistance up to two (2) years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.

Program Qualifications:

Participants would be responsible to pay their portion of rent as calculated FY2014-6: HCV Rent Reform and would be required to meet with the SAHA Resident Services Coordinator, to assist with career opportunities and advancement. Participants would also be required to be employed by one of the employers participating with SAHA's partner for this program, SA Works. The program would also require participants to commit to career paths provided by their employers in their respective fields in order to further increase their salaries.

Potential clients will be referred to by either the partner employers or workforce partners to the Resident Services Coordinator who will then determine eligibility. The Resident Services

Coordinator will work with property management to ensure annual eligibility and to determine any hardship cases. Property management will also be responsible for compliance adherence and reporting.

All potential residents must attend SAHA's Early Engagement Program or demonstrate that they have attended the following SAHA approved classes: Financial Literacy, Housekeeping or How to be a good tenant, Conflict Resolution, and Tenant's Rights and Obligations. Potential resident must demonstrate that they have been employed a minimum of 90 days with the existing employer.

Partner employers must demonstrate that the potential resident is on a career path, such as their management programs, to detail how the resident will advance and achieve self-sufficiency within the five (5) year limit of housing assistance. SAHA, the respective workforce partners, the employer, and the resident will execute a contract that details the resident goals that could include the following:

1. **Financial/Asset Building**: Opening and maintaining Checking and Savings Accounts; Household has saved at least 3 months of monthly expenses, Improving Credit Scores to qualify for market rate housing and/or homeownership; secure reliable transportation
2. **Employment/Retention/Advancement**: Maintains employment with the existing employer through the duration of the contract or with another employer within the existing industry; advances within the set career path plan set forth by employer
3. **Income**: Increase income throughout the contract period and achieve 80% AMI at or before the end of the 5 year limit
4. **Education/Training**: Secure High School Diploma or GED; secure post secondary degree(s); complete industry recognized certifications; if needed, complete English As a Second Language Program

All participating residents must maintain good standing and meet with the Resident Services Coordinator on a monthly basis to report the progress of the goals.

Participants will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)).

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

1. FY2021-2: Limiting increases in rents

i. Plan Year Approved, Implemented, Amended

This activity is designed to increase housing choices for low-income families who might be experiencing a loss of income or other economic hardship, and are unable to pay additional rent. The activity was approved in the FY2020-2021 MTW Plan.

ii. Description/Update

Update: This activity is scheduled to be implemented in February 2021.

Description: Recent weeks have seen historic levels of unemployment claims in San Antonio and throughout the country. SAHA has seen a spike in reports of loss of income from residents. At the same time, landlords are seeking to increase rents. The agency is concerned this will negatively impact tenants as SAHA may cover part of the increase (up to the payment standard) but tenants more than likely will receive an increase in their rent portion.

This activity uses the Agency's MTW flexibility to limit voucher contract rent increases to no more than 3%, in order to prevent terminations or evictions, and maintain a constant and predictable tenant rent. The Agency arrived at 3% by conducting a historical rent increase analysis. This activity will be sunsetted after 24 months, or sooner, if the national funding situation improves, and the agency is able to meet MTW requirements of serving substantially the same number of households.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

C. Activities On Hold

None

D. Closed Out Activities

FY2011-1 Block grant funding with full flexibility

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out due to its reference to the MTW Single Fund Flexibility, and not to any additional waivers.

FY2011-1a _ Promote Education through Partnerships

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

FY2011-1b _ Pilot Child Care Program

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The pilot childcare training program ended in the fall of 2011. While the program did have some success in FY2011 in assisting 10 residents in their completion of child care training and certification, there was not enough support for the program to continue. This activity was closed out in FY2011-2012.

FY2011-1c _ Holistic Case Management

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

FY2011-1d _ Resident Ambassador Program

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 Plan, the activity was closed out because it uses only the MTW Single Fund Flexibility, and no additional waivers.

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

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year In the FY2013-2014 Plan, the activity was closed out because faster transaction times have reduced the need for this activity.

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

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

FY2011-4 Streamline methods of verification for PH and HCV

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

FY2011-5 Requirements for acceptable documents for PH and HCV

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

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

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

FY2011-7 Remove limitation of commitment on PBV so that PBV may be committed to more than 25% of the units in family developments without required provision of supportive services

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

FY2011-8 Revise mobility rules for PBV

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

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

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

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

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

FY2014-1 Streamline Reexamination Requirements and Methods (HCV)

This activity was designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. This activity was closed out as of FY2016, due to staff analysis finding that it was no longer needed.

FY2013-1 Time-limited Working Household Preference Pilot Program

This activity was designed to increase housing choices and promote self-sufficiency, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation started in FY2014. This pilot activity is proposed to be closed out as of FY2017 and upon approval of this plan. Staff analysis of the pilot identified process improvements that will be implemented in a new MTW Activity proposed for FY2017. Pilot households will be transitioned into the new MTW Activity or the standard public housing program.

FY2013-3 Standardize Section 8 and Public Housing Inspection Progress

This activity was designed to unify Section 8 and Public Housing inspection standards. The intent was to raise lower standards to a higher, uniform level. It was anticipated that UPCS (Public Housing) would serve as a model for most elements, but some were to be derived from HQS (Section 8). This activity has been on hold until now, pending results of HUD tests at other PHAs. HUD has completed the study and is now conducting a demonstration. SAHA has no plans to participate in the demonstration and will implement new inspection standards for Section 8 in accordance with any new guidelines set forth by HUD. This activity was closed out as of FY2017.

FY2014-4 Biennial Reexaminations (HCV and PH)

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.

FY2014-5 Triennial Reexaminations (HCV)

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.

FY2016-2 Biennial and Triennial Notification of Rent Type Option

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-20 Alternative Recertification Process.

Section V. Sources and Uses of Funds

*****To be updated per FY2022 budget as approved by the Board of Commissioners scheduled in June 2021. Current figures are estimates based on FY2021 budget.**

A.Estimated Sources and Uses of MTW Funds

i. Estimated Sources of Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	$9,216,480
70600	HUD PHA Operating Grants	$138,561,623
70610	Capital Grants	$4,820,923
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$0
71100+72000	Interest Income	$443,282
71600	Gain or Loss on Sale of Capital Assets	$5,072,323
71200+71300+71310+71400+71500	Other Income	$2,066,951
70000	Total Revenue	$160,181,582

ii. Estimated Uses of Funds

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$15,931,045
91300+91310+92000	Management Fee Expense	$8,178,479
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	$1,207,653
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$5,094,990
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$17,221,884
95000 (95100+95200+95300+95500)	Total Protective Services	$217,540
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$1,899,208

96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$2,807,193
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$556,277
97100+97200	Total Extraordinary Maintenance	$0
97300+97350	HAP + HAP Portability-In	$103,978,140
97400	Depreciation Expense	$9,388,720
97500+97600+97700+97800	All Other Expense	$0
9000	**Total Expenses**	**$166,481,129**

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

Total expenses are greater than sources -- FDS line item 97400, Depreciation is a non-cash expense which does not require a cash outlay.

Per Board Resolution 6032 dated June 4, 2020, SAHA Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:
1) Section 8 funding shortfall - $2.2 million
2) Public Housing funding shortfall - $4.5 million
3) Program administration and implementation of MTW initiatives - $1.4 million
4) Capital Planning - $500 thousand
5) Additional Funding for East MEadows Public Improvements and Relocation - $200 thousand
6) Expansion of Public Housing Wi-Fi - $2 million
7) Highland Park property support - $1 million
8) Preservation and expansion of affordable and public housing - $15.1 million

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

The Community Development Initiative Department (CDI) uses staff resources and MTW funds to provide services designed to promote and support outreach and service coordination, resident engagement, and self sufficiency. In addition to administrative costs for a dedicated service department, the Agency also uses MTW funding for the following:

- Education Investment Foundation: SAHA's education-related programming is significant and diverse, and funding directly supports:
    - REACH Awards: recognize and reward students annually for academic achievement

- College Scholarship Program: funds scholarships for up to 50 students annually to provide much needed support to ensure higher educational achievement

- ConnectHome: SAHA has made it a priority to develop and implement digital inclusion strategies that address the digital divide. This priority is supported with MTW funds.
- Internship & Volunteer Program: Funding supports staff who are responsible for organizing community volunteers and integrating them into CDI services activities such as food distributions and wellness checks.
- Apprentice program: New program in development that is aimed to fund up to six in gaining job experience and marketable skills
- Early Engagement Program: Funding supports MTW activity 14-2- Early Engagement. See section 4 for more details.

B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute? **Yes**

ii. Is the MTW PHA implementing a local asset management plan (LAMP)? **No**

iii. Has the MTW PHA provide a LAMP in the appendix? **No**

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year. **N/A**

C. Rental Demonstration (RAD) Participations

i. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
Given recent HUD guidance, the Agency is exploring the feasibility of participating in RAD.

ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? **No**

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment? **N/A**

Section VI. Administrative

(VI) ADMINISTRATIVE	
ANNUAL MTW PLAN	
A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.	See Appendix B
B. DOCUMENTATION OF PUBLIC PROCESS The beginning and end dates of when the Annual MTW Plan was made available for public review and the dates, location and number of attendees of public hearings must be provided. HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the Standard MTW Agreement (or successor MTW Agreement).	See Appendix B
C. PLANNED AND ONGOING EVALUATIONS The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).	FY2015-1: MDRC / HUD Rent Study is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.
D. LOBBYING DISCLOSURES The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).	See Appendix B