

Section III. Proposed MTW Activities

Summary

Proposed Amendments to Existing Activities	Proposed New Activities
2. FY2011-9: Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services 10. FY2015-3: Modified Project Based Vouchers 13. FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation	1. FY2020-1: Palo Alto College, College Homeless Assistance Program 2. FY2020-2: St. Phillips College, College Homeless Program 3. FY2020-3: Family Self Sufficiency (FSS) Program Streamlining 4. FY2020-4: Time-Limited Workforce Housing Pilot Program (PBV)

Proposed Amendments to Existing Activities

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

Update: This activity is ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio. As of December 2018, the Agency has 147 of the 200 set-aside vouchers leased. The Agency is proposing one significant change described below.

i. Plan Year Approved, Implemented, Amended

This activity was approved and implemented in FY2010-2011.

ii. Description/Update

Description: SAHA allocates set-aside of tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside would be for families (defined by 24 CFR 5.403) with specific priority needs, such as those who are homeless. Current partners are The Center for Health Care Services (CHCS) and San Antonio Metropolitan Ministries (SAMM).

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

iii. Planned Non-Significant Changes

Move On: Up to forty (40) tenant-based vouchers will be set-aside to support a Permanent Supportive Housing (PSH) provider currently partnered with SAHA in their mission. This set-aside is already allowable under the current activity.

iv. Planned Changes to Metrics/Data Collection

The Agency will update benchmarks in accordance with the additional allocation of up to forty (40) vouchers.

v. Planned Significant Changes

The Agency is proposing to adopt alternative portability policies for all set-asides under this activity to ensure participants are able to continue receiving supportive services by partners while receiving housing assistance. Under this alternative policy, recipients would not be able to port or take their SAHA set-aside voucher to another jurisdiction.

MTW Authorization: (2) Attachment C, Section D.1.g: The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. This authorization waives certain provisions of Section 8(r) of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the Agency's Annual MTW Plan.

10. FY2015-3: Modified Project Based Vouchers

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The Agency is proposing a significant change described below.

i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost effectiveness, and was originally approved as part of the FY2014-2015 MTW Plan.

ii. Description/Update

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

Secondly, this activity also increases cost effectiveness by removing the automatic provision of a tenant-based voucher to a household who wishes to relocate from a unit associated with local project based set aside voucher. 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

The Agency plans to allocate additional modified projective-based vouchers at SAHA properties. The allocation of modified PBVs is already allowable under the current activity.

Planned allocations at existing SAHA - Beacon properties will be dependent on occupancy needs in support of the following initiatives:

1. 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.
2. 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.

Planned allocations at new SAHA developments:

3. 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.
4. 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).

iv. Planned Changes to Metrics/Data Collection

The Agency will update benchmarks in accordance with the additional allocations.

v. Planned Significant Changes

The Agency proposes to create alternative waitlist policies 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)

MTW Authorization: (1) Attachment C, Section D.4: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

The Agency proposes to remove the twenty-five percent (25%) per project cap for the Agency's modified project based units. This change falls under the Agency's existing MTW waiver:

7. Establishment of an Agency MTW Section 8 Project-Based Program

The Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance, which includes the components set forth below:

- a. The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD's requirements regarding subsidy layering. If the Agency chooses to project-base Section 8 assistance at such properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. This authorization waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan; specifically 24 C.F.R 983.56 Cap on number of PBV units in each project.

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

This activity was previously approved and implemented in FY2019 for Phase I. The Agency is seeking approval of Phase II of implementation. Phase II is scheduled to be implemented July 1, 2019. In summary, the changes proposed include:

1. Expanding the number of small areas from two (2) to ten (10),
2. Eliminating the subsidy cap from Phase I,
3. Setting the payment standard schedule between 81% and 90% of HUD's SAFMRs, and
4. Updating the exception overlay mechanism.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

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 proposed to phase-in SAFMR 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 developing this 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 tenant-based assistance that differ from the currently mandated program requirements. The Agency requested and received a waiver in Year 1 (FY2018-2019).

This plan year, the Agency is requesting approval for Phase II of the two-phase (two-year) approach to implementation as (outlined in more detail in section E.vi. TRANSITION PERIOD).

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity is designed to increase housing choices by expanding the geographic scope of options and preserving affordability in neighborhoods experiencing market squeezes. By setting payment standards that better match submarket rents, the Agency will be increasing affordability across all neighborhoods while ensuring the best use of limited financial resources. The Agency's subsidy will now be sufficient for households to not only enter into neighborhoods previously unaffordable to them but also to stay in neighborhoods that may be experiencing rapidly rising rents.

iii. Provide the anticipated schedule for implementing the proposed activity.

The Agency implemented this activity July 1, 2018 through a multi-phase, multi-year transition. (see section E.iv. TRANSITION PERIOD for more details). Phase II is scheduled to be implemented July 1, 2019.

The timing of the annual payment standard update has historically required the Agency to implement new schedules on January 1 -- which is in the middle of the fiscal year. This is a result of HUD's publishing requirements. 42 USC 1437f requires FMRs be posted at least 30 days before they are effective and that they are effective at the start of the federal fiscal year (generally October 1).

While the Agency would like to use the most up-to-date SAFMRs for FY2020 implementation, publication of these SAFMRs are not expected to be available until after the start of the fiscal year (August/September). At which point, the Agency would need time to analyze the new SAFMRs and develop an updated schedule, pushing the implementation to January 1 for reexaminations with effective dates starting in May. This delay in the transition from two tiers to ten is not ideal.

In addition, implementation of two different schedules during the same fiscal year -- July 1 implementation using FY2019 HUD data (released October 2018) and January 1 using newly published FY2020 HUD data (to be released October 2019)-- is not ideal either as it would hinder the Agencies ability to evaluate the effectiveness of the policy and would create an administrative burden.

As a result, the Agency plans to use HUD’s FY2019 SAFMRs effective October 2018 to implement the new tiers and payment standard schedule to be effective as of July 1, 2019. The Agency will begin processing reexaminations with the new tiers and schedule starting July 1, 2019. Because the Agency begins processing reexaminations 120 days prior to the household’s examination date, the new tiers and schedule will effectively be applied to reexaminations with effective dates starting November 1, 2019.

To stay consistent with the annual payment standard update approval process, the new payment standard schedule (see Appendix 6) will be approved by a separate Board Resolution once the framework outlined in this activity has been approved by the Board of Commissioners and HUD. Modifications to payment standards would be allowed with Board approval where appropriate/necessary. The Agency anticipates reviewing the payment standards in August/September when new SAFMRs are published by HUD.

B. ACTIVITY METRICS INFORMATION

HUD Standard Metrics: According to HUD guidance, this activity requires 3 standard HUD metrics: CE#1, CE#2, and HC#5

The Agency does not anticipate any cost savings as a result of this activity. Staff workloads related to the application of the new payment standards is expected to remain the same. There will be other cost implications which are outlined below in section c.

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmarks
Total cost of task in dollars (decrease).	Performance level prior to implementation \$0	Projected Outcome (long-term target) Annual Benchmarks \$0

Data Source: Fiscal year end financial reporting on staff costs.

CE #2: Staff Time Savings		
Unit of Measurement	Baseline	Benchmarks
Total time to complete the task in staff hours (decrease).	Performance level prior to implementation 0 hours	Projected Outcome (long-term target) Annual Benchmarks 0 hours

Data Source: Fiscal year end financial reporting on staff costs.

HC #5: Increase in Resident Mobility		
Unit of Measurement	Baseline	Benchmarks
Number of households able to move to a better unit and/or neighborhood	Performance level prior to implementation	Projected Outcome (long-term target)

of opportunity as a result of the activity (increase).		Annual Benchmarks
Phase I: Number of Existing voucher clients who moved to a new unit located in Tier 2	343 existing voucher clients moving to a unit in Tier 2 [25% of annual movers in FY2017]	Forthcoming in FY2019 Report [More than 25% of annual movers]

Data Source: This will be tracked by integrating the Agency’s Geographic Information System with the Housing Information System to track addresses from the MTW-50058 for new admissions and voucher clients moving to a new unit.

SAHA Metrics: The Agency plans to track additional metrics in order to determine the impact of this alternative payment standard activity. These metrics include lease-up success rate, average shopping days, average HAP by Tier, percent of households self-reporting that they were able to move to a preferred neighborhood on post-move customer service surveys, voucher concentration by tier, and percent of households who were able to stay in a rapidly changing neighborhood. While the Agency does not anticipate to see an impact on these metrics in year 1, the long term goal is that we will see these indicators increase over time. Specific long-term targets will be set as part of Phase II.

Lease-up Success Rate by Post-Move Tier		
Unit of Measurement	Baseline	Benchmarks
Percent of vouchers issued that were leased-up within 120 days	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
	County-wide: 37.7%	Forthcoming in FY2019 Report

Data Source: This will be tracked in the Agency’s Elite database and reported on using standard leasing reports with a breakdown by Tier.

Average # of days searching by Post-Move Tier		
Unit of Measurement	Baseline	Benchmarks
Average number days between the date the voucher is issued and the date the request for tenancy (RTA) is approved.	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
	County-wide: 58 days	Forthcoming in FY2019 Report

Data Source: This will be tracked in the Agency’s Elite database and reported on using a standard leasing reports with a breakdown by Tier currently being developed by staff.

Average HAP by Tier		
Unit of Measurement	Baseline	Benchmarks

Average Housing Assistance Payment by Tier	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
	CY 2017 avg: \$590	Forthcoming in FY2019 Report

Data Source: Fiscal year end financial reporting on HAP costs.

Households moving to preferred neighborhood by Post-Move Tier		
Unit of Measurement	Baseline	Benchmarks
Percentage of households self-reporting that they were able to move to a preferred neighborhood on post-move surveys (increase).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
	Forthcoming in FY2019 Report	Forthcoming in FY2019 Report

Note: This metric is different from HC#5 in that it is self-reported by household, meaning opportunity neighborhood is defined by the household.

Data Source: This metric will be tracked through a new “Post-Move Customer Service Survey” the agency plans to develop.

HCV Concentration by Tier		
Unit of Measurement	Baseline	Benchmarks
HCV households living in each Tier as a percentage of total renter households	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
	Phase II: Tier 1 8.31% Tier 2 7.82% Tier 3 9.85% Tier 4 2.86% Tier 5 2.15% Tier 6 2.20% Tier 7 1.88% Tier 8 0.06% Tier 9 0.45% Tier 10 0.46%	Forthcoming in FY2019 Report

Data Source: This will be tracked by integrating the Agency’s Geographic Information System with the Housing Information System to track addresses from the MTW-50058 for new admissions and voucher clients moving to a new unit.

HC #5: Increase in Resident Stability

Unit of Measurement	Baseline	Benchmarks
Number of households able to stay post- move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Number of Existing voucher clients who moved from a lower cost tier to a higher cost tier who have stayed in place after year 1	Forthcoming in FY2019 Report	Forthcoming in FY2019 Report

Data Source: This will be tracked by integrating the Agency’s Geographic Information System with the Housing Information System to track addresses from the MTW-50058 for new admissions and voucher clients moving to a new unit.

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency anticipates an estimated \$1M in additional HAP expenditures per year as a result of Phase II. Below are the estimated cost implications of Phase II.

	Estimates Proposed Phase II
Current monthly HAP	\$7,367,783
Average Per Unit Cost (PUC) Jan-Sep 2018	\$614.84
Estimated Monthly HAP with Tenant Protection	\$7,456,00
Estimated Monthly Increase as a result of Phase II	\$88,217
Estimated Annual Increase as a result of Phase II	\$1,058,604

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

Due to its MTW status, the Agency faces a unique challenge in terms of balancing its MTW statutory requirement to maintain a baseline number of households served and to comply with the new SAFMR regulation without being eligible for additional administrative fees and HAP subsidy.

The Agency anticipates serving forty-eight (48) fewer households on an annual basis as a result of Phase II. It is important to note that no current households would be removed from the program as a result of the policy; rather, the total households served would be reduced through attrition.

Currently, the Agency is able to serve households in addition to public housing and voucher households as a result of its preservation and expansion activities under the FY11-1e Preservation and Expansion Activity. While the Agency is confident it can cover this financial impact and impact to households served while meeting all other financial obligations and maintaining substantially the same number of households; the Agency will need to monitor voucher leasing activity more closely. This also presents additional administrative burdens the Agency will be absorbing.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

Attachment C, Section D.2.a: The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan;

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.

The Agency is requesting this waiver in order to increase housing choices by waiving the standard payment schedule to set payment standards outside the range of 90 to 110% of SAFMRs.

Under HUD's current SAFMR guidelines, the Agency would have to implement the increases in payment standards for higher cost ZIP codes immediately while holding harmless households living in lower cost ZIP codes. The hold harmless policy applies in year 1 due to two tenant protections built into HUD's rule which state:

- (1) Households must receive at least 12 months written notice before any payment standard reduction during current HAP contract and
- (2) In the year that a metropolitan area first transitions to a designated SAFMR area, the SAFMR for a ZIP code area may be no less than 90 percent of the area's MAFMR in the previous fiscal year.

If the Agency implemented HUD's version of SAFMR, the Agency estimates \$2.8M in increased annual HAP expenditures. This increase would result in estimated loss of 129 vouchers per year or 387 vouchers over a three year period (SAHA current recertifies households every two to three years). The estimated loss would put the Agency at risk of not meeting its MTW obligations to serve substantially the same number of households. Below are the estimated cost implications of implementing SAFMR without MTW flexibilities.

	SAFMR without MTW
Current monthly HAP	\$7,367,783
Average Per Unit Cost (PUC) Jan-Sep 2018	\$614.84
Estimated Monthly HAP with Tenant Protection	\$7,605,007
Estimated Monthly Increase as a result of Phase II	\$237,007
Estimated Annual Increase as a result of Phase II	\$2,856,084

This activity will only apply to tenant-based housing choice vouchers. All non-MTW special program tenant-based vouchers such as VASH will have payment standards set using HUD's published small area fair market rents without any flexibility. All project-based vouchers will

continue to have payment standards set using the HUD-published metropolitan fair market rents. Tenant-based housing choice vouchers associated with place-based initiatives (such as Choice Neighborhood) may also be set using HUD-published metropolitan fair market rents.

E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

(i) IMPACT ANALYSIS

The MTW PHA may provide an impact analysis for each component of the rent reform activity or a comprehensive impact analysis of the rent reform activity. To assess the impacts of the rent reform activity, the following steps are suggested:

(1) A description of how the proposed MTW activity will impact household rent/tenant share.

The Agency will maintain the current hold harmless policy. As a result, existing households will not experience an increase to their rent/tenant share as a result of the payment standard change as long as the current HAP contract stays in place. New admissions will enter the program under the new tiered payment schedule, thus, will not experience an increase to their rent/tenant share either.

(2) A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.

The Agency will be tracking this activity by enhancing its current leasing activity reports. In addition, the Agency continues to work with the MTW Alliance to develop evaluation methods to monitor the activity in the context of an Agency-wide policy initiative related to neighborhoods of opportunity and understanding the neighborhood trade-offs residents are making. This effort also includes exploring other strategies to strengthen landlord relationships, assess the need for down payment assistance, and partner with the City of San Antonio and VIA Metropolitan Transit on identifying other barriers and solutions to accessing neighborhoods of opportunity.

In addition, the Agency is currently working to develop a mobility counseling pilot program in partnership with Fair Housing Council of Greater San Antonio. The Agency believes this pilot program will generate additional information and data that will inform this activity.

The Agency is also working with its research partners to roll out a new tool that will allow voucher clients to search for available housing within their shopping estimates based on their locational preferences and priorities such as proximity to work, school, and medical facilities.

(3) A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)

		Phase II
HAP Impact	Change to Annual HAP expenditures	\$1,058,604

Rent Burden:	#/% of current clients who would see an increase in	0
Households	their portion of rent	
Negatively Affected	Average annual rent increase/% of household income	\$0/%

(4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded.

The San Antonio Housing Authority envisions a future in which our community celebrates affordable housing that is well integrated into the fabric of all neighborhoods. To that end, as part of the Agency’s new policy initiative focused on neighborhoods of opportunity, the Agency has drafted guiding principles and key policy assumptions to help guide the agency in balancing its internal performance goals, community impact goals, and financial realities.

- SAHA recognizes that San Antonio is economically segregated: In the last 5 years, three different studies have concluded that San Antonio is one of the most economically segregated cities in the country¹.
- SAHA recognizes that neighborhood characteristics impact life outcomes and that physical amenities and challenges are inequitably distributed throughout San Antonio and that this inequitable distribution results in disparate resident health, employment, and education outcomes.
- SAHA recognizes that voucher holders are concentrated in certain areas of San Antonio and that these same areas correspond with neighborhoods experiencing inequitable distribution of physical amenities and face more challenges.²
- SAHA commits to improve resident health, employment, and education outcomes, by increasing the number and proportion of SAHA households in high opportunity neighborhoods in order to ensure all San Antonio neighborhoods are economically integrated. This commitment encompasses the agency’s place-based and mobility-based initiatives.

To this end, as part of Phase II, the Agency believes it has been able to strike a reasonable balance between HAP expenditures, tenant share of rent, and long-term policy goals.

(ii.) HARDSHIP CASE CRITERIA

The MTW PHA must establish a hardship policy that clearly defines the circumstances under which households may be exempted or provided temporary relief from the activity. The MTW PHA must describe how such households could access the hardship policy and the associated process.

Phase II of 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.

¹ Rise of Residential Segregation by Income (Pew Center), Distressed Communities Index (Economic Innovation Group), Ranking of income segregation (Richard Florida, CityLab)

² Walter, R. (2018). Consolidating ZIP Codes for Small Area Fair Market Rents: A Method for Implementing the New Rule. *Housing Policy Debate*. DOI: 10.1080/10511482.2017.1404481

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.

SAFMR Hardship Policy: The policy below outlines the process for clients to request a hardship, the criteria that would warrant a hardship, the review process, and possible remedies available to clients under the local SAFMR activity. Key changes that reflect updates to the exception overlay are redlined.

(A) Hardship Waiver Request Process.

The process for requesting a waiver will be as follows:

- (1) 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 incapacitation or death of an income-earning household member and amount of lost income.
- (3) 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 Review Process

- The administrative review of the household circumstances will be conducted by SAHA according to current review processes.
- For hardship claims related to imminent risk of eviction or involuntary displacement, SAHA will conduct an expedited hearing process.
- 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.
- SAHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

(C) Hardship Waiver Criteria

- Affordability Cap: Households will be considered for a hardship waiver, as discussed below, if:
 - The household's total monthly family contribution exceeds 40 percent of its current monthly gross income at move-in and the household realizes it's unable to afford their rent portion.
 - The household faces risk of eviction for non-payment of rent – including utility shut-off for non-payment of utility bills that could lead to eviction.
 - Other circumstances as determined by the housing agency.

- Exception Overlay: Households will be considered for a hardship waiver, as discussed below, if:
 - The household is currently under contract for a unit located in the Agency's exception overlay.
 - The landlord requests for an increase in rent after the first contract year and the new contract rent is determined to be reasonable by the Agency.
 - The household's new total monthly family contribution exceeds 50 percent of its current monthly gross income and the household realizes it's unable to afford their rent portion as a result of the increased contract rent.
 - The household faces risk of eviction for non-payment of rent – including utility shut-off for non-payment of utility bills that could lead to eviction and/or involuntary displacement.
 - Other circumstances as determined by the housing agency.

(D) Hardship Remedies

The Hardship remedies may include any of the following:

- Affordability Cap: For households who requested a hardship because their total monthly family contribution exceeds 40 percent of their monthly gross income at move-in, SAHA will reduce the household's family contribution to 40 percent of their monthly gross income for the remaining months in their current lease term.
- Exception Overlay: For households who request a hardship under the exception overlay, SAHA will reduce the household's family contribution to 50 percent of their monthly gross income for the remaining months in their current lease term.
- Participant may request an exception payment standard as a reasonable accommodation in accordance with 16.2.B(7) of the Administrative Plan.
- Opting out of the small area fair market rent policy is not a remedy option.

(E) End of Hardship Waiver Period

- Affordability Cap: Hardships will remain effective up until the end of their current lease term.
- Exception Overlay: Hardships will remain effective for one calendar year or until the next reexamination.

(iii.) DESCRIPTION OF ANNUAL REEVALUATION

The MTW PHA must provide an overview as to how the activity will be reevaluated on an annual basis in the Annual MTW Report, mitigating negative impacts and unintended consequences.

The Agency will conduct monthly leasing reviews as well as quarterly review of available data on local submarket conditions, trends and projections to ensure local payment standards are reflective of the local market and subsidies are sufficient for voucher clients. Modifications to payment standards would be allowed with Board approval where appropriate/necessary. The Agency anticipates reviewing the payment standards in August/September when new FMRs are published by HUD.

If the Agency determines that the HUD published small area fair market rents are not sufficiently accurate for the local market, the Agency may explore the procurement of a third-party to conduct this analysis on a regular basis. At which time, it would request to waive the use of HUD's published SAFMRs as the basis for calculating payment standards.

In addition, the Agency is currently working to develop a mobility counseling pilot program in partnership with Fair Housing Council of Greater San Antonio. The Agency believes this pilot program will generate additional information and data that will inform this activity.

(iv.) TRANSITION PERIOD

The MTW PHA must develop a plan and timeline for transitioning households into the activity. If a rent reform activity, the MTW PHA should show how the impact analysis informed this transition period.

Phase I of this activity was implemented July 1, 2018. Phase II will be implemented July 1, 2019.

The second phase expands the two tiers to ten (10) tiers, slightly modifies the exception overlay, and establishes a new method for setting the payment standard schedule. Below are the details explaining key updates under Phase II. (See Appendix 5 for Supplemental Maps and Payment Standard Schedule)

- (1) 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.³ In addition, the Agency has implemented HUD's SAFMR for its smaller special programs using ten (10) tiers.
- (2) Payment Standard methodology: The Agency reviewed various methods for setting the payment standard in each Tier⁴. 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.
- (3) 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.

³ The Agency hosted monthly meetings with the MTW Alliance SAFMR Work Group Committee made up of local partners including fair housing advocates, transportation partners, local apartment associations, realtors, and other affordable housing stakeholders.

⁴ As part of monthly MTW Alliance SAFMR Work Group Committee meetings, methods reviewed included using selected SAFMRs within each Tier to set the payment standard. Options included using the maximum or highest, the minimum or lowest, the median or middle, 90% of the maximum, and 90% of the minimum within each tier to set the payment standard.

- (a) 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.
- (b) 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 are justified⁵. Two ZCTAs (78215 and 78235) were removed from the overlay because there are 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.
- (c) 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 hardships submitted by residents under the exception overlay. 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.

⁵ The Agency reviewed aggregate land value data from the Bexar County Appraisal District for years 2014 and 2018. In addition, the median home value and gross rent five-year estimates were reviewed for years 2012 and 2017.

Proposed New Activities

1. FY2020-1: Palo Alto College, College Homeless Assistance Program

Background: Palo Alto College, founded in 1985 in South Bexar County is a two-year community college classified as a Hispanic Serving Institution. The college awards Associate of Arts, Associate of Applied Science, Associate of Science, Associate of Teaching degrees and enrolls approximately 10,000 students each term. Palo Alto College, while independently accredited by the Southern Association of Colleges and Schools, Commission on Colleges is also a member of the 5 institution Alamo Colleges District which includes, St. Phillips College, San Antonio College, Northwest Vista College and Northeast Lakeview College. Serving a mostly first-generation, under-served student population with approximately 70% of incoming students needing some kind of developmental coursework and over 65% receiving some type of financial aid the mission of the college has been, “To inspire, empower and educate our community for leadership and success”.

In Fall of 2015 Palo Alto College launched a student resource initiative focused on advocacy for students living on the margins. Initial steps began with framing the local landscape and student need which was ascertained by a survey that included over 2,373 respondents. Besides the need for health care services, career preparation and personal counseling was the need for financial literacy/wellness. In understanding the broader landscape Palo Alto College then drew upon national research by the Wisconsin Hope Lab which reported that the cost of attending college was a major concern for nearly half of all community college students and a lack of finances is an issue that could cause them to withdraw from college. Also revealing, half of community college students are housing insecure in their living arrangements as indicated by students who describe housing unaffordability and instability at approximately 35% or those describing outright homelessness at 14%.

Palo Alto’s Advocacy journey continued and in December of 2016 Palo Alto College opened the doors to our Student Health, Advocacy, Resource and Engagement (SHARE) Center. The SHARE Center houses a food pantry, professional clothes closet, mental health counseling, social service referrals as well as financial wellness and career counseling services. As part of a culture of continuous improvement Palo Alto College then began in 2017 the process of preparing to administer three important data collection tools. Palo Alto College engaged the Trellis Corporation in developing a student financial wellness survey (SFWS) and also partnered with the University of Michigan Healthy Minds Survey (HMS) on the mental health of community college students. Finally, Palo Alto College also established the Community Partner Advisory Board (CPAB) made up of members from K-12, private industry such as HEB and community based organizations such as Daughters of Charity, San Antonio Food Bank and Healthy Futures of Texas to conduct asset mapping to identify gaps and resources to further inform the colleges warehouse of knowledge in these areas.

Local Need Identified: In 2018, both the Palo Alto College Financial Wellness Survey and the University of Michigan Healthy Minds survey were administered revealing a new level of granularity with which to better understand the precarious financial and housing issues Palo Alto College (PAC) students face. More than half of SFWS respondents, 64% indicated they would have trouble getting \$500 in cash or credit in the case of an emergency. Often these emergencies lead to long term financial debt or to a housing crisis. Approximately half or 47% of these students also indicated they worry about paying for their current monthly expenses. This

matched almost exactly with respondents from the HMS survey with approximately 47% of students surveyed deeming their financial situation “often or always stressful”. Of particular note 30% of students surveyed showed signs of being housing insecure and 6% reported being homeless in the last 6 months. The data collected was then presented to our Community Partner Advisory Board who recommended partnering with the City of San Antonio (COSA), The San Antonio Housing Authority (SAHA), and The South Alamo Regional Alliance for the Homeless (SARAH) to address homelessness among community college students.

Becoming Part of a Local Solution: Tenant-based Housing Vouchers for Palo Alto College homeless students can become part of a local solution.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

The Agency is proposing to use its MTW flexibility to create a homeless set-aside program in partnership with a local community college to address the local housing needs of homeless college students.

Unlike the proposed homeless college program in partnership with St. Phillips College (see FY2020-2 below), the Agency currently does not operate existing housing developments near Palo Alto College. The closest property would require more than an hour commute on public transportation. As a result, the Agency is proposing to tackle 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 a new homeless college pilot program, they are being proposed apart from the Agency’s set-asides allocated under FY2011-9.

This proposed activity would allow the Agency to set-aside up to 20 tenant-based housing choice vouchers for households referred by Palo Alto College (PAC). Palo Alto College has developed a three prong approach to engaging in the homeless college student dialogue that includes the following:

1. Development of pre-emptive interventions designed to help students avert homelessness through financial literacy and or financial planning and become knowledgeable about the community resources available through community partners.
2. Creation of emergency housing program funded through Palo Alto Colleges Emergency Aid Program (EAP) funded in part through the Trellis Corporation for students needing short term shelter between 1-3 days either through one of our CBO partners such as The Salvation Army or through MOU agreements with local hotels funded through EAP.
3. Housing Vouchers provided to Palo Alto College Students through the SAHA MTW flexibilities when students meet the eligible criteria for the College Housing Assistance Program.

Students seeking housing vouchers through the College Housing Assistance Program must meet the following criteria.

1. Prior to completing the Palo Alto College, College Housing Assistance Program voucher application students must complete an intake screening with staff from the Palo Alto College SHARE Center located in SC 101.
2. Students must complete a Palo Alto College, College Housing Assistance Program voucher application.

3. Students must have a home school of Palo Alto College and be enrolled in at least 6 credit hours at Palo Alto College in a degree or certificate program. If students have already been awarded a degree or certificate, then they are not eligible for the program unless approved by Dean/VPSS. While preference will be given to Palo Alto College students, students enrolled at any Alamo Colleges District institution may also be considered for assistance if capacity exists.
4. Students are required to move to full-time enrollment by their third semester in the program if not at full-time enrollment at the time of application.
5. Students may not be in arrears or owe funds to any housing authority.
6. Students must have a completed FAFSA on file.
7. Must have a cumulative PAC Grade Point Average of 2.0 or higher. If no GPA exists, then prior coursework will be reviewed on a case by case basis. Should a student not meet the GPA requirement, student may request an appeal for continued participation in the program.
8. May not be considered for the program until census day enrollment has been met upon which student may submit the College Housing Assistance Program voucher application.
9. Submit a brief 3-5 sentence statement explaining the circumstances around the students housing insecurity as it relates to the definition provided.
10. Student income may not exceed 30% of the area median income.
11. Consent to FERPA Release Statement on application. Student Waiver: By submitting this emergency grant request, I acknowledge and give consent for data to be shared with the Department of Housing and Urban Development, or their representatives, as part of College Housing Assistance Program. I understand that my information will not be sold for any purpose and will not be distributed to other parties. Examples of data shared include, but are not limited to: student name and ID, enrollment status, annual income, estimated family contribution, emergency request amount, emergency request type, date of birth, demographics, dependents, parental educational attainment, re-enrollment status etc.
12. Must meet with Financial Literacy Sr. Advisor for an advising session and/or participate in a financial coaching session/workshop. Dates, Times, and Locations are available at the SHARE Center in SC 101. Coaching session will be completed after the disbursement of the grant unless student is available and able to complete the coaching earlier.
13. Students must also meet federal requirements in order to be eligible for the program and must complete the San Antonio Housing Authority application process in order to be given full consideration.
14. Students have up to one semester after graduation to secure housing at which point students are no longer eligible for the housing voucher.
15. The housing voucher will cover a portion of the rent at any SAHA or non-SAHA unit as per see FY2014-6: HCV Rent Reform.
16. Completion of the Palo Alto College Housing Assistance Program does not guarantee access to or awarding of any housing voucher unless all requirements have been met for both the institution and SAHA.

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)).

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This proposed activity will increase housing choices by providing homeless college students stable housing.

iii. Provide the anticipated schedule for implementing the proposed activity.

The allocation of voucher funds will be budgeted for FY2020. Utilization of vouchers is expected by January 1, 2020.

B. ACTIVITY METRICS INFORMATION

i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.

HUD Standard Metrics: According to HUD guidance, this activity requires 6 standard HUD metrics: HC#1, HC#7, SS#3, SS#5, SS#6, SS#8

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmarks
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Number of homeless college students receiving housing assistance and partner-provided services	0	20

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency’s Housing Information System. SAHA records will be reconciled with partner records to verify enrollment.

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmarks
Number of households receiving services aimed to increase housing choice (increase).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Number of homeless college students receiving housing assistance and partner-provided services	0	20

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System. SAHA records will be reconciled with partner records to verify enrollment.

SS#3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	Benchmarks
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).
Report the following information separately for each category: 1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of work-able households in <<category name>> after implementation of the activity (number).
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).
1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	To be determined for each student during enrollment	To be determined for each student during enrollment

Data Source: This will be tracked through partner data collection.

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).
Homeless College Student Households	0	20

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SS #6: Reducing Per Unit Subsidy Costs for Participating Households		
Unit of Measurement	Baseline	Benchmarks
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).
Average amount of Section 8 and/or 9 subsidy per household	\$614.84	No Change

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
Number of households transitioned to self sufficiency (increase).	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero..	Expected Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after to implementation of the activity (number).
Agency-wide Definition: PH household who is paying a flat rent for at least 6 months or a HCV household utilizing a zero HAP voucher for at least 6 months.	0	0 in Year 1
Student is able to secure housing without the housing voucher	0	0 in Year 1

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency does not anticipate any additional costs associated with the allocation of housing resources under this activity.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

Not Applicable.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

(1) Attachment C, Section D.1.g: The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. This authorization waives certain provisions of Section 8(r) of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the Agency's Annual MTW Plan.

(2) Attachment C, Section D.2.d: The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 C.F.R. 982 Subpart L and 983 Subpart E as necessary to implement the Agency's Annual MTW Plan.

(3) Attachment C, Section D.3.

a.: The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(2) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have been otherwise in Section I.C. of the MTW Agreement are met. This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW Plan;

b.: The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement the Agency's Annual MTW Plan.

(4) Attachment C, Section D.4: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.

(1) Attachment C, Section D.1.g: The activity would allow the Agency to remove the ability for the household to move under portability (24 C.F.R. 982.353 Portability: Administration by initial and receiving PHA)

(2) Attachment C, Section D.2.d: The activity would allow the Agency to terminate housing assistance after three (3) years and for households who fail to comply, without good cause, with the homeless program requirements. (24 C.F.R. 982 Subpart L, specifically 982.552 PHA denial or termination of assistance for family)

(3) Attachment C, Section D.3: The activity would allow the Agency to establish eligibility requirements in addition to 24 C.F.R. 982.201 to include eligibility requirements for the partner homeless program. In addition, it would allow the Agency to waive income targeting requirements.

(4) Attachment C, Section D.4: The activity would allow the Agency to establish alternative waiting list policies that would establish a local preference for direct referrals from the partner. (24 C.F.R. 982.207 Waiting List Local preferences in admission to program)

E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

Not Applicable. Students will be new admissions and follow existing MTW rent calculations (see FY2014-6: HCV Rent Reform)

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

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 neighborhood neighboring several of SAHA existing housing communities as well as SAHA undeveloped land parcels. SPC is one of five separately accredited colleges in the Alamo Colleges District.

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.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

The Agency is proposing to use its MTW flexibility to create 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 homeless⁶. The rental assistance would be limited to three years and rent would be based on education success.
- (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 2.0 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.

⁶ Students and their families must meet HUD's definition of homeless (which encompasses 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.

Tiered Rent: This activity would establish a tiered rent structure that is tied to the students' education success. Rent would be effectively discounted for better grades and would not exceed 30% of the students income even if the student's grades were not as high. At the end of each semester, the student would be required to submit their grades in order to determine which tiered rent they would pay⁷. The Agency's partners have had success with similar financial incentives and would like to test the incentive as part of this program. The Agency will work closely with the partner to ensure households facing extenuating circumstances will have access to a hardship. Below are the proposed tiers.

Tier	Tiered Rent Amount	GPA Requirement
Tier 1	10% of monthly gross income or \$100 whichever is larger	GPA 3.5 - 4.0
Tier 2	20% of monthly gross income or \$150 whichever is larger	GPA 3.0 - 3.4
Tier 3	30% of monthly gross income or \$200 whichever is larger	GPA 2.4 - 2.9

Hardship Policy:

- SAHA and its partner may allow for a one month hardship for any student that graduates from the program or times out but still is not ready to give up the housing subsidy. The student will have to demonstrate to SAHA's partner the need by showing that paying rent without the subsidy would be more than 40% of their income. The one month hardship would be on top of the 30 day notice required.
- SAHA and its partner will allow students who have established disability services with SPC to apply for a reasonable accommodation that would allow the rent to be frozen at the lowest amount of 10% of monthly income or \$100 whichever is higher. The student will

⁷ In compliance with Section 504 of the Rehabilitation Act of 1973, the Alamo Colleges is committed to ensuring that all programs, services, and facilities are accessible to and provide equal opportunities for education to all students. The disability services office at each college coordinates accommodations for students with permanent and temporary disabilities as defined by the Americans with Disabilities Act (ADA) of 1990. Students who meet the guideline criteria are encouraged to establish accommodations through the disability services office at the college where their classes are being taken. Accommodations eliminate barriers and insure equal access in order for students with disabilities to be as fully engaged in the educational experience as possible. Disability services offers accommodations to help level the playing field and create opportunities for success for students with disabilities. Accommodations to students may include, but not limited to: peer volunteer note-taking, extended test time, alternative test-taking location, readers, scribes, Oral or ASL interpreter services, adaptive equipment, assistive technology, tape recorders for classroom use, alternate format reading material, and/or in-class accommodations. More information :

<https://www.alamo.edu/spc/experience-spc/current-students/support-centers/disability-services/>

Note: Accommodations will be selected in a collaborative effort between the student, and the SPC DS staff, however students are expected to take a lead role in this effort. Accommodations must be requested at the beginning of the semester, each semester they are needed. The day-to-day arrangements and implementing the adjustments made to the student plan is between the student and the student's instructors.

have to demonstrate to SAHA's partner the need by showing the student is meeting requirements as identified by the student plan developed in collaboration with SPC's disability services staff, the student, and the student's instructors.

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This proposed activity will increase housing choices by providing homeless college students stable housing.

iii. Provide the anticipated schedule for implementing the proposed activity.

The development and partnership agreements will need to be executed prior to construction. The allocation of voucher funds will be budgeted for FY2020. Utilization of funding is expected to start prior to the end of FY2020. Approval of this activity will allow the Agency to continue pursuing development partnerships and additional development funding sources.

B. ACTIVITY METRICS INFORMATION

i. Provide the metrics from the "Standard HUD Metrics" section that are applicable to the proposed activity.

HUD Standard Metrics: According to HUD guidance, this activity requires 6 standard HUD metrics: HC#1, HC#7, SS#3, SS#5, SS#6, SS#8

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmarks
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Number of homeless college students receiving housing assistance and partner-provided services	0	30

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System. SAHA records will be reconciled with partner records to verify enrollment.

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmarks

Number of households receiving services aimed to increase housing choice (increase).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Number of homeless college students receiving housing assistance and partner-provided services	0	30

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System. SAHA records will be reconciled with partner records to verify enrollment.

SS#3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	Benchmarks
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).
Report the following information separately for each category: 1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of work-able households in <<category name>> after implementation of the activity (number).
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).
1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	To be determined for each student during enrollment	To be determined for each student during enrollment

Data Source: This will be tracked through partner data collection.

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks

Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).
Homeless College Student Households	0	30

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SS #6: Reducing Per Unit Subsidy Costs for Participating Households		
Unit of Measurement	Baseline	Benchmarks
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).
Average amount of Section 8 and/or 9 subsidy per household	\$614.84	No Change

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
Number of households transitioned to self sufficiency (increase).	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero..	Expected Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after to implementation of the activity (number).
Agency-wide Definition: PH household who is paying a flat rent for at least 6 months or a HCV household utilizing a zero HAP voucher for at least 6 months.	0	0 in Year 1
Students are able to secure housing without the	0	0 in Year 1

housing voucher		
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Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency does not anticipate any additional costs associated with the allocation of housing resources under this activity.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

Not Applicable.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

(1) Attachment C, Section D.2.a: The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan

(2) Attachment C, Section D.2.d: The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 C.F.R. 982 Subpart L and 983 Subpart E as necessary to implement the Agency's Annual MTW Plan.

(3) Attachment C, Section D.3.

a.: The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(2) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have been otherwise in Section I.C. of the MTW Agreement are met. This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW Plan;

b.: The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement the Agency's Annual MTW Plan.

(4) Attachment C, Section D.4: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.

(1) Attachment C, Section D.2.a: The activity would allow the Agency to implement the tiered rent structure as proposed

(2) Attachment C, Section D.2.d: The activity would allow the Agency to terminate housing assistance after three (3) years and for households who fail to comply, without good cause, with the homeless program requirements. (24 C.F.R. 982 Subpart L, specifically 982.552 PHA denial or termination of assistance for family)

(3) Attachment C, Section D.3: The activity would allow the Agency to establish eligibility requirements in addition to 24 C.F.R. 982.201 to include eligibility requirements for the partner homeless program. In addition, it would allow the Agency to waive income targeting requirements.

(4) Attachment C, Section D.4.: The activity would allow the Agency to establish alternative waiting list policies that would establish a local preference for direct referrals from the partner. (24 C.F.R. 982.207 Waiting List Local preferences in admission to program)

E. RENT REFORM INFORMATION

HUD defines "rent reform" as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

I. IMPACT ANALYSIS

The MTW PHA may provide an impact analysis for each component of the rent reform activity or a comprehensive impact analysis of the rent reform activity. To assess the impacts of the rent reform activity, the following steps are suggested:

(1) *A description of how the proposed MTW activity will impact household rent/tenant share.*

All households admitted into this program will be new admissions; as a result, they will not experience a change in their rent/tenant share. The proposed rent structure effectively sets the maximum tenant share to the standard of 30% of monthly income or a minimum rent of \$200 (whichever is larger). Students have access to rent discounts as identified by tiers 1 and 2 that would not otherwise be made available to them.

(2) *A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.*

The Agency will work closely with the partner to jointly track this activity. The Agency and partner will establish points of contacts at each agency to discuss any unintended consequences/impacts of the rent reform.

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

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

SAHA is requesting to modify its Family Self Sufficiency Program. The overall goal is to create operational efficiencies that will maximize engagement in the FSS program. The Agency is requesting two exemptions:

1. Total Tenant Payment: The Agency is proposing to calculate total tenant payment in compliance with 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 waiver would allow the Agency's FSS contracting to follow the same calculations for the current HCV alternative rent policies as well as any future rent calculation changes in either HCV or PH. This impacts the FSS escrow credit calculations as well as when the FSS contract of participation is considered completed.
2. Eliminate 120 day rule: the Agency is requesting to enroll new FSS households in accordance with policy in its Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. According to PIH 93-24, the Agency must conduct a reexamination or interim determination if more than 120 days will occur between the effective date of the FSS contract of participation and the effective date of the last reexamination or interim redetermination. Currently, in the HCV and PH program, reexaminations are conducted per an approved MTW activity, FY19-2 Alternative Reexamination Process, which uses biennial and triennial schedules. This waiver would allow the Agency to enroll new FSS households outside 120 days of an annual or interim recertification of income process -- FSS participants will continue to follow the Agency's family obligations to report any changes in income as established in Admin Plan and ACOP. As a result, any household wanting to enroll in FSS could do so without being required to request an interim recertification or wait until the next annual recertification. This modification will provide a shorter wait time from the pre-selection interview to the enrollment into the program.

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity will increase cost effectiveness by creating administrative efficiencies in the Family Self-Sufficiency Program.

1. Operations staff will no longer be required to process interims for FSS enrollment when the household has not experienced a change in income. Staff will continue to process interims for FSS enrollment if the household's income has changed since the last interim/annual recertification.
2. FSS staff will no longer have to wait to enroll new FSS participants. This will also allow them to keep the interest household engaged and progressing towards self-sufficiency.

3. FSS staff will no longer have to do manual TTP calculations during the FSS contracting process.

iii. Provide the anticipated schedule for implementing the proposed activity.

This activity will be implemented starting July 1, 2019.

B. ACTIVITY METRICS INFORMATION

i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.

HUD Standard Metrics: According to HUD guidance, this activity requires 3 standard HUD metrics: CE#1, CE#2

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmarks
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
Operations staff time multiplied by average salary + benefits + Fss staff time multiplied by average salary + benefits	Operation staff time: 0.19 Times average operation staff wage + FSS staff time: 0.33 Times average FSS staff wage	Operation staff time: 0.19 Times average operation staff wage + FSS staff time: 0.08 Times average FSS staff wage

Data Source: This will be tracked through FSS enrollment on the MTW-50058 in the Agency’s Housing Information System.

CE #2: Staff Time Savings		
Unit of Measurement	Baseline	Benchmarks
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).
Operations: Total time to process interim/annual multiplied by the number of new FSS enrollments outside the 120 days + FSS: Total time to manually complete TTP calculation for FSS contracting multiplied by the total number of FSS enrollments	.19 hours X number of FSS interims + .33 hours X number of executed FSS contracts	.19 hours X number of FSS interims + .08 hours X number of executed FSS contracts

Data Source: This will be tracked through FSS enrollment on the MTW-50058 in the Agency's Housing Information System.

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency expects to experience cost savings as a result of staff time savings.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

See metrics above.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

Attachment C, Section E. Authorizations Related to Family Self Sufficiency: The Agency is authorized to operate any of its existing self-sufficiency and training programs, including its Family Self-Sufficiency (FSS) Program and any successor programs exempt from certain HUD program requirements. These may include those requirements governing program size or participation, including whether to establish escrow accounts and other rent incentives and whether to establish mandatory self-sufficiency participation requirements. If the Agency receives dedicated funding for an FSS coordinator, such funds must be used to employ a self-sufficiency coordinator. In developing and operating such programs, the Agency is authorized to establish strategic relationships and partnerships with local private and public agencies and service providers to leverage expertise and funding. However, notwithstanding the above, any funds granted pursuant to a competition must be used in accordance with the NOFA and the approved application and work plan. This authorization waives certain provisions of Section 23 of the 1937 Act and 24 C.F.R. 984 as necessary to implement the Agency's Annual MTW Plan.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.

Attachment C, Section E.: This activity would allow the Agency to implement alternative calculations for total tenant payment in FSS contracting (24 CFR 984.304(b) and 24 CFR 984.304(b)(i)(A) - Total Tenant Payment). In addition, it would allow the Agency to eliminate the 120-day rule.

E. RENT REFORM INFORMATION

HUD defines "rent reform" as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

Not Applicable.

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

Through the Agency's current modified PBV activity (FY2015-3) the Agency is committing up to fifty (50) project-based vouchers to a Beacon or Partnership property. .

The proposed activity below outlines a Time-limited workforce housing pilot program that will be supported by the modified PBVs.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

This pilot project (max 50 households) for working residents that 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)).

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity will promote self-sufficiency by providing on-site supportive services that promote self-sufficiency. .

iii. Provide the anticipated schedule for implementing the proposed activity.

The Agency anticipates implementation prior to the end of FY2020 to include identifying SAHA property, hiring the Resident Services Coordinator, executing agreements with the partners, and further developing programming.

B. ACTIVITY METRICS INFORMATION

i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.

HUD Standard Metrics: According to HUD guidance, this activity requires 6 standard HUD metrics: SS#1, SS#3, SS#5, SS#6, SS#8

SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmarks
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).
Average earned income of households	TBD at enrollment	TBD at enrollment

Data Source: This will be tracked in the Agency's Case Management Information System

SS#3: Increase in Positive Outcomes in Employment Status		
Unit of Measurement	Baseline	Benchmarks
Average amount of savings/escrow of households affected by this policy in dollars (increase).	Average savings/escrow amount of households affected by this policy prior to implementation of the activity (in dollars). This number may be zero.	Expected average savings/escrow amount of households affected by this policy after implementation of the activity (in dollars).
Report the following information separately for each category: 1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of work-able households in <<category name>> after implementation of the activity (number).
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).
1. Employed Full- Time 2. Employed Part- Time 3. Enrolled in an Educational Program 4. Enrolled in Job Training Program 5. Unemployed 6. Other	TBD at enrollment	TBD at enrollment

Data Source: This will be tracked in the Agency's Case Management Information System

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
Number of households	Households receiving self	Expected number of

receiving services aimed to increase self sufficiency (increase).	sufficiency services prior to implementation of the activity (number).	households receiving self sufficiency services after implementation of the activity (number).
Households served by program	0	50

Data Source: This will be tracked in the Agency's Case Management Information System

SS #6: Reducing Per Unit Subsidy Costs for Participating Households		
Unit of Measurement	Baseline	Benchmarks
Average amount of Section 8 and/or 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease)	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).
Average amount of Section 8 and/or 9 subsidy per household	\$614.84	Decrease by year 5

Data Source: This will be tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SS #8: Households Transitioned to Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
Number of households transitioned to self sufficiency (increase).	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero..	Expected Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after to implementation of the activity (number).
Agency-wide Definition: PH household who is paying a flat rent for at least 6 months or a HCV household utilizing a zero HAP voucher for at least 6 months.	0	0 in Year 1
Households who are able to successfully transition out of assisted housing in five years or less	0	0 in Year 1

Data Source: This will be tracked in the Agency's Case Management Information System

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency does not anticipate any additional costs associated with the allocation of housing resources under this activity.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

Not applicable.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

(1) Attachment C, Section D.2.d, Rent Policies and Term Limits: d. The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 C.F.R. 982 Subpart L and 983 Subpart E as necessary to implement the Agency's Annual MTW Plan.

(2) Attachment C, Section D.3. Eligibility of Participants

a.: The Agency is authorized to determine income qualifications for participation in the rental assistance program that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations, as long as the requirements that i) at least 75 percent of those assisted under the demonstration are "very low-income" as defined in section 3(b)(2) of the 1937 Act, ii) substantially the same number of low-income persons are assisted under the demonstration as would be without the MTW authorizations contained herein, and iii) a comparable mix of families are assisted under the Agreement as would have been otherwise in Section I.C. of the MTW Agreement are met. This authorization waives certain provisions of Sections 16(b) and 8(o)(4) of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, and 982.201 as necessary to implement the Agency's Annual MTW Plan;

b.: The Agency is authorized to adopt and implement any reasonable policy for verifying family income and composition and for determining resident eligibility that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of 24 C.F.R. 982.516 and 982 Subpart E, as necessary to implement the Agency's Annual MTW Plan.

(3) Attachment C, Section D.4. Waiting List Policies: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.

(1) Attachment C, Section D.2.d: The activity would allow the Agency to terminate housing assistance after five (5) years and for households who fail to comply, without good cause, with the homeless program requirements. (24 C.F.R. 982 Subpart L, specifically 982.552 PHA denial or termination of assistance for family)

(2) Attachment C, Section D.3: The activity would allow the Agency to establish eligibility requirements in addition to 24 C.F.R. 982.201 to include program requirements outlined above. In addition, it would allow the Agency to waive income targeting requirements.

(3) Attachment C, Section D.4.: The activity would allow the Agency to establish alternative waiting list policies that would establish a local preference for direct referrals from the partner. (24 C.F.R. 982.207 Waiting List Local preferences in admission to program)

E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

Not applicable.