Moving to Work

Annual MTW Plan- FY2020

San Antonio Housing Authority | 818 S. Flores | San Antonio, TX 78204 | www.saha.org

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Section I. Introduction

The San Antonio Housing Authority (SAHA) provides housing to 65,000 children, adults, and seniors through three housing programs – Public Housing, Housing Choice Vouchers, and mixed-income housing programs. SAHA employs approximately 500 people and has an annual operating budget of $186 million. Existing real estate assets are valued at over $500 million.

SAHA's involvement with Moving to Work (MTW) dates back to May 2000, when SAHA implemented its initial MTW demonstration program in three Public Housing communities: Mission Park Apartments, Wheatley Courts, and Lincoln Heights Courts. In 2009, SAHA signed an amended and restated agreement with the U.S. Department of Housing and Urban Development (HUD) to make the MTW demonstration an agency-wide program.

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

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

A. FY2019 Update Summary

The Agency is proposing several new activities in addition to changes to existing activities that would enable the Agency to more effectively address housing affordability in our community.

Proposed changes are rooted in the Agencies desire to leverage local partnerships by coupling supportive services with housing assistance for key at-risk populations including homeless college students, homeless families, and youth aging out of foster care. The proposed changes are also a reflection of the Agency's efforts to continue supporting our current homeless initiatives while also identifying innovative ways to expand them.

Other proposed changes will help further the Agency's goal to increase the geographic scope of affordable housing choices so that households are able to find quality, affordable units that provide a foundation for success. The second phase of the Agency's Local Small Area Fair Market Rent activity is expected to open up previously inaccessible neighborhoods for voucher holders. In addition, the proposed Workforce Initiative aims to chip away at the lack of affordable housing in our area while also promoting self-sufficiency by partnering with local employers to assist households down a path of economic growth.

B. Overview of Short and Long-term MTW goals and objectives

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

Vision: Create dynamic communities where people thrive.

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

Strategic Goals

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

The Agency's MTW Plan and Strategic Plan are closely integrated. Strategic Plan goals articulate and reinforce the three statutory MTW goals.

Strategic Plan Update

In the coming year, SAHA's Strategic Plan will be updated. Policy and Planning will work with Commissioners, staff, stakeholders, and the community to update goals, metrics, and targets for a new strategic plan. The strategic planning process will be informed by the agency's MTW successes and challenges, as well as by other planning considerations. The new agency strategic plan will also serve as the framework for multi-year MTW objectives and other long-term MTW planning.

MTW Advisory Committee and MTW Alliances

SAHA has changed the way in which the agency engages stakeholders on MTW issues, replacing the MTW Advisory Committee with separate MTW Alliances. For many years, the MTW Advisory Committee -- made up of external stakeholders and key SAHA staff -- was focused on providing feedback on the MTW Plan. Starting in January 2018, the Committee started discussing alternative roles for the group. One of the alternatives that received broad support was to reconstitute the Advisory Committee as a number of Alliances. Each Alliance would be organized around one of the MTW Statutory Objectives (listed above in the Introduction to this section). A Housing Choice Alliance, for example, would reach out to other agencies and organizations who share the goal of increasing housing choices for low-income families. Alliance members could then identify specific objectives and promising strategies, develop short- and long-term plans, and coordinate communications and fundraising as a group.

The Alliance structure has had some success in its first year of deployment. The Housing Choice Alliance, in particular, has made significant progress in defining a common vision, theory of change, and promising projects. The Education, Employment, and Self-sufficiency Alliance will need to regroup in FY2019-20 (if not earlier) to revisit its approach. At any rate, SAHA expects to continue to work within the Alliance framework in FY2019-20.

C. Non-MTW Related Housing Authority Information

Supportive Housing

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

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

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

Moderate Rehabilitation (Mod-Rehab) Program: provides rent subsidy payments to private property landlords for select rental units that have been rehabilitated under this program. Subsidies provide housing assistance to families and individuals as they transition into affordable housing. There are a total of 240 certificates for families.

Mainstream: provides rental assistance for elderly and disabled households. Currently, there are 179 vouchers authorized for this program. Starting July 1 2019, per the Agency's existing MTW Agreement, mainstream vouchers will be administered under MTW authority and applicable MTW waivers will be applied. This has been noted in Section 4 for all existing waivers; all new voucher waivers will automatically cover mainstream vouchers unless otherwise noted.

HUD-VASH: serves homeless veterans by combining the HCV rental assistance program with case management and clinical services provided by Veterans Affairs medical centers. There are presently 544 authorized vouchers under this program. On June 13, 2019, the Agency received HUD approval to extend the following MTW Agreement provisions to its HUD-VASH program:

(1) FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation
(2) FY2019-2: Alternate Recertification Process

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

The Agency plans to implement the extension of these waivers to the HUD-VASH Program - upon HUD approval of the MTW plan and pending public comment period and board approval. This has been noted in Section 4 for all referenced waivers above. Any future MTW Agreement provisions the Agency seeks to extend to the HUD-VASH Program will require approval from the HUD VASH office prior to implementation.

Section II. General Housing Authority Operating Information

A. Housing Stock Information

i. Planned New Public Housing Units

At the beginning of FY2019, the agency had a total of 6,137 units in inventory and is expected to close the fiscal year with 6,015 units (94 scattered sites disposed and 28 single family homes demolished at Villa Fortuna). Based on planned dispositions in FY2020, the Agency is projecting to have 5,894 units in the Low Income Public Housing Program (LIPH, also referred to as public housing) by the end of FY2020.

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

Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year	**0**

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

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

ii. Planned Public Housing Units to be Removed

It is anticipated that the total projected number of public housing units will be reduced by 230 during FY2020.

Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year. (see Appendix 5 Asset Management Plan)

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Scattered Sites AMP 533	94	HUD approved - high cost of managing and maintaining these units
BR/SF/PL/VF AMP 536	28 (VF) +9 (SF)+11	Mirasol - Westside Reinvestment Initiative /

	(PL) Total 48	Homeownership
Springview Replacement Home AMP 531	7	Section 32 Program / HOPE VI - Springview Homes Disposition
Springview Buildings B/C 147/148 AMP 531	25	Planned new development - Our Lady of Charity Apartments, 93 tax-credit units
Remaining Scattered Site AMP 533	69	Pending HUD application and approval - high cost of managing and maintaining these units
Tampico Warehouse	0	Pending HUD application and approval - Development of new multi-family apartment complex, est.200 units

Total Public Housing Units to be Removed in the Plan Year	**243**

iii. Planned New Project Based Vouchers (PBV)

SAHA plans to project-base thirty (80) new housing choice vouchers in FY2020. If additional opportunities to project base housing choice vouchers at additional properties arise during FY2020, SAHA will report on any actions taken in a subsequent MTW Report.

Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Beacon Communities (Various)	30	No	Beacon Communities is the Agency's non-profit housing portfolio. PBVs are committed as per FY15-3 Modified Project Based vouchers and will be allocated based on Beacon occupancy and direct referrals from the partner.
Partnership or Beacon Communities	50	No	In addition to Beacon Communities, the Agency has a Partnerships portfolio. PBVs are committed as per FY15-3 Modified Project Based Vouchers.

Planned Total Vouchers to be Newly Project-Based	**80**

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN	RAD?	DESCRIPTION OF PROJECT

		YEAR*		
Gardens at San Juan	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	Leased / Issued	No	Final phase of Choice Neighborhood

Planned Total Existing Project-Based Vouchers	**75**

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

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

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

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. It is anticipated that construction will be completed and units re-occupied by the end of FY20. Tenant Protection Vouchers (TPV) - a total of 94 TPVs are expected to be added to the voucher portfolio as a result of the public housing scattered site disposition.

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

The San Antonio Housing Authority's capital expenditures during the plan year will be dedicated to capital improvement projects, A/E related costs, construction management fees, and operating-administration costs throughout the public housing portfolio. The capital plans will address Life-Safety repairs, comprehensive modernization and substantial renovations at several public housing developments.

Planned Capital Improvements

Property	Budget	Description
Blanco (1)	$ 420,000	Basement Structural Repairs
Cassiano (1)	$ 300,000	7 Offline Unit Restoration
Cassiano	$ 200,000	Foundation Repairs
College Park	$ 75,000	Elevator #2 - Cylinder Replacement
Fair Avenue (1)	$ 2,000,000	Fire Sprinkler System/Alarm Upgrades
Highview	$ 161,200	Storm Drainage Repairs
Le Chalet	$ 1,300,000	Substantial Renovation
Mirasol Homes	$ 1,209,800	Roof Repairs - Replacement
Morris Beldon	$ 912,000	Substantial Renovation
Park View	$ 1,300,000	Roofing, Exterior Panels
San Pedro Arms (1)	$ 90,000	Elevator Modernization
South San Apts.	$ 161,200	Drainage Repairs
T.L. Shaley (1)	$ 220,000	Fire Restoration

Victoria Plaza (1)	$	17,000,000	Comprehensive Modernization
Various PH Properties	$	500,000	Installation of A/C Window Units
Villa Tranchese (1)	$	2,000,000	Fire Sprinkler System/Alarm Upgrades
Villa Veramendi	$	950,000	Roof Repairs and Replacement

(1) Partial expenditures may carryover from FY19 to FY20.

B. Leasing Information

i. Planned Number of Households Served

As detailed in the table below, SAHA plans to serve **18,305 MTW households** in fiscal year 2018-19, through both public housing, MTW Housing Choice Vouchers, and other families served as part of activity FY2011-1e.

Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	69,900	5,825
MTW Housing Choice Vouchers (HCV) Utilized	146,880	12,240
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	2,052	171
Local, Non-Traditional: Homeownership^	N/A	N/A

Planned Total Households Served	**18,236**

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

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	N/A	N/A	N/A
Property-Based	FY2011-1e: Preservation & Expansion	2,052	171
Homeownership	N/A	N/A	N/A

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

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	The Agency is currently undergoing waitlist maintenance and adjusting the ACOP to increase success rate from selection to move in. This is expected to increase lease-up activity.
MTW Housing Choice Voucher	The Agency continues to select applicants from the waitlist to ensure MTW baseline is met. In addition, the Agency is currently undergoing wait list maintenance to increase success rate from selection to lease-up.
Local, Non-Traditional	None.

C. Waiting List Information

i. Waiting List Information Anticipated

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Section 8 Tenant Voucher	Voucher	14,045	Closed	Yes
Mod Rehab	Community Wide	22,586	Open	n/a
Public Housing	Site-Based	22,630	Open	n/a
East Meadows Project Based Vouchers	Project Based Voucher Site Based	12,467	Open	n/a
Gardens at San Juan Project Based Vouchers	Project Based Voucher Site-Based	30,482	Open	n/a
Wheatley Park Senior Project Based Vouchers	Project Based Voucher Site-Based	169	Open	n/a
Beacon Communities Project Based Vouchers	Project Based Voucher Site-Based	0	Closed	Yes*
Beacon Communities or Partnerships Project Based Vouchers	Project Based Voucher Site-Based	0	Closed	Yes*

***Referral based**

Please describe any duplication of applicants across waiting lists:

Total number of unique applicants is 51,352 with each applicant averaging around 2 waiting list applications each.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
S8 Tenant Based Voucher	The Agency plans to open the list when the wait time is less than 4 months for applicants.
Beacon Communities Project Based Vouchers	The Agency plans to open the list on July 1, 2019. The list will be referral based.
Beacon Communities or Partnerships Project Based Vouchers	The Agency plans to open the list when the new development is completed. The list will be referral based.

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

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

SAHA allocates set-aside of tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside are 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.

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.

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.

Hardship Policy: A set-aside voucher recipient may be given the opportunity to port out of SAHA's jurisdiction in the following cases:

1. If the recipient has an approved reasonable accommodation need; or
2. If the recipient requests an emergency transfer request under the VAWA Act of 2013.

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 ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio by increasing housing choices.

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

This activity was approved and implemented in FY2010-2011. As of December 2018, the Agency has 147 of the 200 set-aside vouchers leased. The Agency is proposing one significant change described below.

B. ACTIVITY METRICS INFORMATION

The Agency has updated existing benchmarks in accordance with the additional allocation of up to forty (40) vouchers.

HUD Standard Metrics: According to HUD guidance, this activity requires 1 standard HUD metric: HC#1. In addition, the agency tracks 2 additional metrics.

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. Tenant-based Set-Asides for Homeless/Permanent Supportive Housing	Performance level prior to implementation	Expected housing units of this type after implementation of the activity (number).
Number of households receiving services aimed to increase housing choice (increase).	0	up to 240

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

SAHA Metrics: The Agency tracks two additional metrics in order to determine the impact of this activity on housing stability.

Maintain Households Served

Unit of Measurement	Baseline	Benchmarks
Percentage of households served that continue to be housed after 2 years	0	90%
Percentage of households served that continue to be housed after 1 years	0	90%

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.

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.

Proposed MTW Authorization: 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.

Existing MTW Authorization: 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.

Attachment C, Section D.1.g: The Agency is requesting this new waiver in order 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.

Attachment C, Section D.4:. The current waiver allows 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.10. FY2015-3: Modified Project Based Vouchers

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

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.

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).

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)

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 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. This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing thereby increasing housing choices.

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

This activity was approved and implemented in FY2014-2015. The newly allocated modified PBVs are expected to occur in FY2020.

B. ACTIVITY METRICS INFORMATION

The Agency has updated existing benchmarks in accordance with the additional allocations.

HUD Standard Metrics: According to HUD guidance, this activity requires 1 standard HUD metric: HC#7, CE#1, and CE#2.

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. Project-based Vouchers	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).

# of additional units made affordable to households based on their actual ability to pay (at or below 80% AMI)	0	up to 146

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

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).
# of units * average per unit cost (PUC) * 12 months	$0	$0

Data Source: This is tracked through data collection 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).
# of recertifications * average staff time per recertification (in hours)	0 hours	0 hours

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

SAHA Metrics: The Agency tracks one additional metric in order to determine the impact of this activity on housing affordability.

Median household income		
Unit of Measurement Median income of households living in local project based set-aside voucher units, by income bracket	Baseline	Benchmarks
80% AMI	80% AMI	75% AMI
60% AMI	60% AMI	55% AMI
50% AMI	50% AMI	45% AMI
30% AMI	30% AMI	25% AMI

Data Source: This is 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.

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.

Proposed MTW Authorizations:

(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.

(2) Attachment C, Section D.1.e The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base, and criteria for expending funds for physical improvements on those units that differs from the percentage and criteria requirements currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(13) of the 1937 Act and 24 C.F.R. 983 as necessary to implement the Agency's Annual MTW Plan.

Existing MTW Authorizations:

(1) Attachment C, Section D.1.b Operational Policies and Procedures
The Agency is authorized to determine the following basic operational policies and procedures for all Section 8 assistance the Agency is provided under section 8(o) of the 1937 Act:

b. The Agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued. This authorization waives certain provisions of Sections 8(o)(7)(a), 8(o)(13)(F) and 8(o)(13)(G) of the 1937 Act and 24 C.F.R. 982.303, 982.309 and 983 Subpart F as necessary to implement the Agency's Annual MTW Plan;

(2) Attachment C, Section D.7.a 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.

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

Proposed MTW Authorizations:

(1) Attachment C, Section D.4: The Agency is requesting this new waiver in order 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)

(2) Attachment C, Section D.1.e: The Agency is requesting this new waiver in order to remove the twenty-five percent (25%) per project cap for the Agency's modified project based units.

Existing MTW Authorizations:

(1) Attachment C, Section D.1.b: The current waiver allows the Agency to remove the mobility option associated with project based vouchers.

(2) Attachment C, Section D.7.a: The current waiver allows the Agency to project-base in SAHA-owned or SAHA -controlled properties.

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.

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).

On June 27, 2019, the Agency received HUD approval to extend this MTW Agreement provision to its HUD-VASH program. The Agency plans to implement the extension of this waiver to the HUD-VASH Program - upon HUD approval of the MTW plan and pending public comment period and board approval.

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 of opportunity as a result of the activity (increase).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Agency is currently developing an evaluation framework as part of engagement with external stakeholders	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.

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.

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 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: Households Negatively Affected	#/% of current clients who would see an increase in their portion of rent	0
	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 country[1].
- 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.

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[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

(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.

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

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

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

Exception Overlay Policy

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

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

(iii.) 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 Tier[4]. The goal of the review was to establish a method that

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[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.

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.

  (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 justified[5]. 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 the relief provided under the exception overlay policy. The Agency may conduct targeted market studies to determine if any area needs to be added to the exception overlay and/or moved to a higher payment standard tier.

[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 AssistanceProgram

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)).

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

- is under 24 years of age;
- is not a veteran;
- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

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

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

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

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

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 neighboring several of SAHA existing housing communities as well as SAHA undeveloped land parcels. It is also located in within the federally designated Eastside Promise Zone (EPZ).

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

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

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

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 homeless[6]. The rental assistance would be limited to three years.

(2) Education: Students must (1) remain enrolled in 12 or more academic credits and otherwise make adequate academic progress toward a degree (SPC will track the adequacy of the student's progress); (2) maintain GPA above 2.5 to maintain housing

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

assistance; (3) complete 64-80 of community services hours per semester; and (4) participate in support services provided by SPC.

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

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

- is under 24 years of age;
- is not a veteran;
- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

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

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

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

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

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.

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	To be determined for each student during enrollment	To be determined for each student during enrollment

6. Other		

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	0	0 in Year 1

least 6 months or a HCV household utilizing a zero HAP voucher for at least 6 months.		
Students are 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.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.

(2) 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.

(3) 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.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)

(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 eligibility requirements for the partner homeless program. 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. Students will be new admissions and follow existing MTW rent calculations (see FY2014-6: HCV 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 the following:

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

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. By allowing households to enroll in the FSS program outside the 120 day period, operations staff and FSS program staff will be able to reduce administrative tasks. Operations staff

1. 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 manually calculate the standard FSS contract 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 2 standard HUD metrics: CE#1, CE#2

This activity's success will be measured by staff time savings in two different departments. This time savings is also measured as an estimated cost savings.

Time savings will be driven by two items:

(1) a reduction in the number of processing actions completed by the public housing and housing choice voucher program staff as a direct result of waiving the 120 day requirement and
(2) a reduction in time per new FSS contract for FSS case management staff as a direct result of the alternative FSS contract.

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 = Total Cost	CE#2 multiplied by average wage + benefits = $3,447	CE#2 multiplied by average wage + benefits = $579

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	. .25 hours X number of FSS interims (170) + .33 hours X number of executed FSS contracts (276) = 134 hours	. .25 hours X number of FSS interims (0) + .08 hours X number of executed FSS contracts (276) = 22 hours

= Total Staff Time		

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 modify the FSS contract to be consistent with the agency's alternative rent calculations (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

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

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	0 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 anticipate 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.

The Agency anticipates an annual cost of $375,000 per year to include the cost associated with the project based vouchers and MTW program administration.

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.

Section IV. Approved MTW Activities

A. Implemented Activities

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. (see Appendix 5 for additional details on the Agency's preservation and expansion plans)

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

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

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

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

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

This activity was revised for FY2016. Language describing Preservation and Expansion Policy context, background, and process was moved to Appendix 3. While the Preservation and Expansion Policy language can provide a helpful backdrop to the goals of FY2011-1e, it can also distract from the specific use of MTW flexibility. The language in FY2011-1e is now focused on the use of MTW funds to preserve or expand affordable housing units without any Section 8 or

Section 9 subsidy. Since no preservation of non-Section 8 or 9 units is planned for FY2016, the metric “HC #2: Units of Housing Preserved” has been set to a benchmark of 0 (zero).

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

The Agency will updated metric benchmarks in the FY2019 MTW Report to reflect the Agency’s Housing Expansion Plan in Appendix 5.2.

v. Planned Significant Changes

None

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

See Section 3 for proposed significant changes.

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

i. Plan Year Approved, Implemented, Amended

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

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

ii. Description/Update

Update: This activity is ongoing and continues to provide an incentive to households who are engaged in a path to self-sufficiency. The Agency is actively seeking additional grant funding to support the possible expansion of approved self-sufficiency programs.

Statutory Goal	Housing Programs	Additional Requirements

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

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

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

As a result of moving to biennial inspections starting July 1, 2019, the Agency anticipates adjusting benchmarks to reflect a decrease in the number of inspections. The per inspection cost will continue to be monitored for cost savings.

v. Planned Significant Changes

None

5: FY2014-2: Early Engagement

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and continues to provide applicants valuable training to be successful participants in the Agency's federal housing programs as they begin their path toward self-sufficiency.

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

Previously approved

FY2014-6: Rent Simplification (HCV)

FY2015-4: Simplified Utility Allowance Schedule

i. Plan Year Approved, Implemented, Amended

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

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

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

ii. Description/Update

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

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

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

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

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

the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric).

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

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

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

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

The flat utility allowance will not be granted in the case of tenant-provided appliances, which are not considered tenant-supplied or -paid utilities.

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

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

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

iii. Planned Non-Significant Changes

After reviewing both Housing Choice Voucher Program rent reform activities, the Agency is proposing a non-significant administrative change to how the Agency reports to HUD -- specifically, the Agency would like to combine the activities for reporting purposes. Both waivers were originally proposed as part of a larger rent reform effort. Because elements were phased in over several years, the Agency sought approval for separate activities instead of seeking approval for a significant change to the first activity, FY2014-6: Rent Simplification (HCV).

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency plans to implement the extension of this waiver to the HUD-VASH Program - upon HUD approval of the MTW plan and pending public comment period and board approval.

iv. Planned Changes to Metrics/Data Collection

After reviewing of the Agency's data collection practices for both activities, FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule, the Agency is now tracking the collective cost savings from both changes to the Housing Choice Voucher Program rent reform. The improved data collection and reporting will allow the Agency to report more accurate cost savings to HUD.

v. Planned Significant Changes

None

8. FY2015-1: MDRC / HUD Rent Study

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and continues to work closely with MDRC.

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

The goals of this alternative rent policy are to:

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

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

I. Description of Rent Reform Components

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

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

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

A. **Description of the Rent Reform Activity**

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

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

2) **Elimination of Deductions**

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

a) Percent Annual Gross Income.

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

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

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

c) Review of Retrospective Income.

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

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

d) Capping the Initial Maximum Rent Burden

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

3) **Triennial Certifications**

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

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

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

9886 to provide tenant consent for SAHA to collect information relevant to the triennial recertification period.

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

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

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

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

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

4) **<u>Streamline Interim Certifications</u>**

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

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

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

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

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

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

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

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

5) **Minimum Rent to Owner**

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

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

6) **Simplified Utility Allowance Schedule.**

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

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

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

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

Proposed Flat Utility Allowance

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

II. Hardship Policy

SAHA is participating in the Study in order to further the national discussion regarding the future of the Housing Choice Voucher Program. The alternative rent strategies are not intended to create an undue burden on the Study Group members. SAHA has established the following

Hardship Policy for Study Group members. Households participating in the Study as part of the Control Group will be subject to the current SAHA policies.

A. **Hardship Waiver Request Process.**

The process for requesting a waiver will be as follows:

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

B. **Hardship Waiver Criteria**

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

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

C. **Hardship Review Process**

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

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

D. **Hardship Remedies**

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

E. **End of Hardship Waiver Period**

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

III. Transition Period

A. **Selection of Participants**

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

- Vouchers not currently administered under the Moving to Work Program:
    - Veterans Affairs Supportive Housing (VASH)
    - Moderate Rehabilitation
    - Shelter Plus Care
    - Enhanced Vouchers

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

B. **Enrollment of Study Group members**

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

2) During Certification Meeting

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

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

3) Mitigation of impact at initial triennial certification

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

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

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

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

10. FY2015-3: Modified Project Based Vouchers

See Section 3 for proposed significant changes

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and currently has 26 households enrolled.

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

1. Overview

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

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

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

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

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

2. Previous Pilot

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

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

Activity elements that remain consistent with the pilot include:

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

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

- The pilot had been oriented to increasing housing choice and self-sufficiency. Now that this activity is referral-driven (instead of wait list preference-driven), the rationale for increasing housing choice by decreasing wait list time is no longer applicable. Instead, the activity will be focused solely on self-sufficiency.
- Households that participated in the previous pilot and remain in good standing will be rolled over automatically into the new program, and their time spent in the pilot will not count against the five-year time limit (the “clock is reset”)
- SAHA and WSA staff are developing a branding and communication strategy regarding the referral program

- SAHA staff will increase messaging of requirements and time limits backed up with strong written policies and procedures
- CDI and PH staff coordinate activities using a master tracking worksheet, that tracks the following:
    - Specific instances when the 5-year term limit is being communicated to participating households
    - If the family refuses to participate in FSS, CDI will inform PH staff, who will initiate eviction proceedings
    - Whether the household is meeting the financial counseling requirement
    - Household cohorts
    - New strategies employed as part of the Individual Plan development (for example, it was discussed that the goals should be focused on how much money it will take for the household to be able to pay flat rent by their 5th year)
    - Hardship tracking process, including all hardships requested
    - Improve methods to ensure families are complying with the rules of the pilot (including retaining employment throughout)
    - Develop a procedure for households moving to section 8

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

12. FY2017-2: Restorative Housing Pilot Program

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and currently has four households enrolled.

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

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

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

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

1. Target Population

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

2. Criminal History Review

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

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

3. Dual Case Management

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

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

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

4. Pilot Requirements

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

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

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

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

5. Pilot Logistics

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

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

6. Outcomes

According to 2012 Byrne CJI Grant Implementation Plan Data collected by Trinity University, the Choice Neighborhood footprint (location of the Resurgence Collaborative), offenders in the footprint have higher rates of recidivism (re-arrests) and a higher arrest rate. The number of people per ZIP code on probation in the footprint is twice that compared to other ZIP codes in Bexar County. Additionally 52% of probationers who live in these ZIP codes had their probation revoked instead of completed, compared to 41% for Bexar County as a whole. Focus groups conducted by Trinity University with probationers also found that transportation is one of the most significant barriers for probationers. Together this baseline data illustrates that the Choice

Neighborhood has a higher percentage of probationers, these probationers struggle with basic needs such as transportation, and these probationers have their probation revoked or re-offend at a greater rate than Bexar County as a whole.

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

iii. Planned Non-Significant Changes

The Agency is working with its partners to possibly expand the eligible population to also include parolees in addition to probationers.

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

See Section 3 for proposed significant changes.

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

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

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

Triennial: A household is eligible for a triennial schedule if the household has at least one elderly or disabled household member and the household receives 100% of their income from fixed sources. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.

Biennial: Households not eligible for a triennial schedule are eligible for a biennial schedule.

(2) Alternate PH Review Procedures (PH only)

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

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

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

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

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

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

Both methods will apply to the low income public housing and housing choice voucher programs.

iii. Planned Non-Significant Changes

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency plans to implement the extension of this waiver to the HUD-VASH Program - upon HUD approval of the MTW plan and pending public comment period and board approval.

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

B. Not Yet Implemented Activities

None.

C. Activities On Hold

To be Closed out in the forthcoming FY2019 Report

D. Closed Out Activities

FY2011-1 Block grant funding with full flexibility

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

FY2011-1a _ Promote Education through Partnerships

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

FY2011-1b _ Pilot Child Care Program

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

FY2011-1c _ Holistic Case Management

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

FY2011-1d _ Resident Ambassador Program

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

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

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

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

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

FY2011-4 Streamline methods of verification for PH and HCV

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

FY2011-5 Requirements for acceptable documents for PH and HCV

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

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

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

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

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

FY2011-8 Revise mobility rules for PBV

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

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

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

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

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

FY2014-1 Streamline Reexamination Requirements and Methods (HCV)

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

FY2013-1 Time-limited Working Household Preference Pilot Program

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

FY2013-3 Standardize Section 8 and Public Housing Inspection Progress

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

FY2014-4 Biennial Reexaminations (HCV and PH)

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-2 Alternative Recertification Process.

FY2014-5 Triennial Reexaminations (HCV)

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-2 Alternative Recertification Process.

FY2016-2 Biennial and Triennial Notification of Rent Type Option

This activity was approved in FY2014 and implemented in January 2014. The activity was being closed out in FY2018 and replaced with the approved FY2019-2 Alternative Recertification Process.

Section V. Sources and Uses of Funds

A.Estimated Sources and Uses of MTW Funds

i. Estimated Sources of Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	$11,083,198
70600	HUD PHA Operating Grants	$128,855,469
70610	Capital Grants	$4,536,440
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$0
71100+72000	Interest Income	$295,184
71600	Gain or Loss on Sale of Capital Assets	$886
71200+71300+71310+71400+71500	Other Income	$1,917,052
70000	Total Revenue	$146,688,229

ii. Estimated Uses of Funds

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

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$16,030,587
91300+91310+92000	Management Fee Expense	$8,022,300
91810	Allocated Overhead	$0
92500 (92100+92200+92300+92400)	Total Tenant Services	$994,949
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$5,450,590
93500+93700	Labor	$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$14,934,133
95000 (95100+95200+95300+95500)	Total Protective Services	$290,102
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$1,649,351
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$3,164,184
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$657,452

97100+97200	Total Extraordinary Maintenance	$96,934
97300+97350	HAP + HAP Portability-In	$95,622,567
97400	Depreciation Expense	$9,609,637
97500+97600+97700+97800	All Other Expense	$0
9000	**Total Expenses**	**$156,522,786**

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

Total expenses are greater than sources -- $2.8 million dollars of expenses included in the uses section of the schedule will be paid with MTW funds currently being held by HUD. Additionally, FDS line item 97400, Depreciation is a non-cash expense which does not require a cash outlay.

Per Board Resolution 5933 dated June 6, 2019, SAHA Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:
1) Section 8 funding shortfall: $900.000
2) Choice implementation matching grant for Wheatley Courts transformation: $1,500,000.00
3) Development of Labor Multi-family Property: $5,500,000.00
4) Capital Planning - $400,000.00
5) Funding for the Rehabilitation of Victoria Plaza - $11,000,000
6) Additional Funding for East Meadows Development - $600,000.00
7) Additional cost for fire and sprinkler systems at Villa Tranchese and Fair - $1,200,000
7) Preservation and expansion of affordable and public housing - $13,300,000
8) Program administration and implementation of MTW initiatives - $1,500,000

iii. Description of Planned Use of MTW Single Fund Flexibility

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

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

A. Education Partnerships

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

1) REACH Awards: recognize and reward nearly 300 students annually for academic achievement
2) College Scholarship Program: funds scholarships for up to 50 students annually to provide much needed support to ensure higher educational achievement
3) Education Summit: provides up to 900 residents annually with access to education and college resources, financial literacy, and other self-help resources
4) Academic Performance and Attendance Initiative: According to Attendance Works (June 2015), "every year as many as 7.5 million students nationwide are chronically absent, meaning they miss 10 percent or more of the school year for any reason, excused or unexcused. That level of absenteeism predicts poor academic performance as early as preschool and is a warning sign that a high school student

will drop out." In San Antonio Independent Independent School district, over 40% of SAHA students are missing 10+ days of school and 21% are chronically absent. To better understand the factors driving low attendance and improve school attendance, SAHA will utilize initial data findings to implement pilot programs that will include:

- Continuing SAHA-SAISD Task Force partnership monthly meetings
- Development of consortium of education partners
- Executing partnership with the City of San Antonio Truancy Court, SAHA, local community based service and education organizations, and SAISD to conduct outreach and education services for households with attendance issues.
- Expand existing attendance initiatives and develop new incentives for children to attend school on a regular basis.
- Develop attendance teams consisting of SAISD school administrators, teachers, parents and SAHA residents.

B. ConnectHome

SAHA has made it a priority to develop and implement digital inclusion strategies that address the digital divide. In 2015, SAHA kicked off ConnectHome, a program created by HUD. ConnectHome's goal is to bridge the digital divide by providing Public Housing and Section 8 families with tools to Access, Participate, and Benefit from the Digital Economy. To achieve this, ConnectHome provides Public Housing and Section 8 families three components of digital inclusion: (1) internet service, (2) computer devices; and (3) digital skills training.

- **Internet Access:** Through free hotspots, Wi-fi expansion, and subscription to affordable services
- **Computer Ownership:** increase access to affordable/free new and refurbished computers through electronics donation program
- **Digital Skills Training:** Teach individuals the skills they need to use computers and the Internet in order to participate in the digital economy. and going beyond the basic digital skills training, ConnectHome have created tracks to further provide opportunities to support: Workforce Development, Education, STEM and Quality of Life.

As of October 2017, SAHA has provided literacy training to 1,314 participants, 454 devices to participants, and connected 773 households to the internet.

Additionally, ConnectHome program goes one step further by implementing strategies that help residents use their new digital tools and skills to improve their education, health, quality of life and employment outcomes. This comprehensive service delivery approach is based on a collaborative model designed in partnership with other community organizations and partners that pursue shared digital inclusion goals.

In addition to general program support, MTW funds also support up to one FTE, up to 8 resident Digital Ambassadors, connectivity improvements, broadband expansion, and program-related contracts.

C. Resident Ambassador Empowerment Program

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

D. Summer Youth Program

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

E. Health and Wellness

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

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

F. Choice Neighborhoods Initiative

San Antonio's Eastside features a unique history, valued institutions, established churches, small businesses, and a core group of dedicated and loyal residents. The San Antonio Housing Authority (SAHA) is in year 5 of utilizing the $30 million EastPoint Choice Neighborhoods Initiative grant from the Dept. of Housing and Urban Development (HUD), to transform the Wheatley Courts area into a "community of choice" -- a safe, healthy, vibrant, thriving community for children, families and seniors.

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

The **People** outcomes focus on families' health, education, safety, and employment, through efforts to encourage and support self-sufficiency and job readiness, and to facilitate access to early childhood and adult education. The **Housing** plan is to redevelop Wheatley Courts into a 414-unit energy efficient, mixed-income community, and to expand the supply of quality housing with 208 new housing units at The Park at Sutton Oaks. The **Neighborhood** component includes six strategies designed to complement the energy of the East Meadows site, by investing resources to create a safe, pedestrian-oriented neighborhood, with homeownership and rehab opportunities, and access to healthcare facilities; a plan to grow business and retail opportunities; the repurposing of vacant lots; and to promote neighborhood beautification.

The key Choice partners include the City of San Antonio (CoSA), McCormack Baron Salazar, Inc., Urban Strategies, Inc., United Way of San Antonio and Bexar County (Eastside Promise Neighborhood), Merced Housing, San Antonio Independent School District (SAISD), St.

Philip's College, VIA, San Antonio for Growth on the Eastside (SAGE), Bexar County and Resurgence Collaborative Partners.

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

A. **People**

The outcomes for Wheatley Courts residents have been achieved by our People Lead, Urban Strategies, Inc. through the comprehensive, on-site case management that facilitates access to quality early childhood education, after-school programs and adult education, as well as improved employment opportunities, with a particular emphasis on expanding job readiness, training and placement programs. The initial assessments indicated that only 12% of Wheatley residents have attended college or received a college degree, 49% have a high school diploma or GED, 39% have no high school diploma or GED, and 51% were unemployed. Through September 2018, Urban Strategies, will continue to work with our Wheatley households to remove education and employment barriers, connect residents with health services and other needed services, and assist families as they return to East Meadows I.

Access to Healthcare is a primary concern for the Choice area. In partnership with SAHA and Urban Strategies, the San Antonio Metropolitan Health Department (SAMHD) conducted a Health Impact Assessment (HIA), which resulted in three key recommendations. The first recommendation was to increase access to health care. To meet this need, SAHA has executed an agreement to partner with the University Health System (UHS) to build a new health clinic in the Choice footprint. The Dr. Robert L.M. Hilliard Center opened in December 2017. In addition, University of the Incarnate Word (UIW) has been providing healthcare services, to include dental and mental health counseling for residents who were impacted by the Medicaid expansion gap.

B. **Housing**

The Housing plan to develop a total of 622 high-quality, energy-efficient, mixed-income units is being implemented in four phases. Phase I includes 208 units at The Park at Sutton Oaks, which is now complete. Phase II (East Meadows I) includes 215 units for families, and was completed December 2018. In October 2017 the construction began for Phase III (Wheatley Park Senior Living), which features 80 units for seniors and is planned to be completed March 2018. Construction for the final and fourth phase (East Meadows II), which includes 119 units for families, will begin May 2018 and is scheduled to be completed by December 2019. The housing development and related infrastructure improvements will be funded through public-private partnerships, featuring a combination of federal, state, and city funding, as well as private equity.

C. **Neighborhood**

Safety and Security, the leading concern of residents in this community, was addressed through a Byrne Criminal Justice Innovation [BCJI] grant awarded in 2011. An initial research survey indicated: twice as many crimes committed in the footprint vs. County or City; twice as many residents on probation vs. County or City; and a higher level of violent and drug crime. The BCJI grant allowed SAHA to work closely with the community and a local academic institution (Trinity University) to identify root causes of crime within the Choice footprint. SAHA and the community developed strategies based on data and best practices, which included:

- **Resurgence Collaborative** - the first comprehensive re-entry program in Texas with community-based network providers co-located with Probation Field Office directed solely for the Eastside Community in transition and their families.
- **Group Violence Intervention (GVI)** -the GVI model provides an evidence-based strategy for law enforcement, community members, and service providers to collaboratively decrease violent crime in a sustainable and community driven process.
- **Crime Prevention Through Environmental Design Efforts -** CPTED efforts worked to target crime indirectly, and long-term environmental improvements are important to ensuring crime reductions last.
- **Community Organizing and Resident Empowerment**- hosted BBQs and meetings with residents and businesses owners that engaged hundreds of residents.
- **Hot Spot Policing** - the BCJI team partnered with the San Antonio Police Department to implement "Drug Market Intervention" to bring swift and certain consequences to violent street drug dealers operating in "hot spot" areas, while giving a second opportunity/reentry services to those drug dealers who do not have violent or extensive criminal backgrounds.
- C**ommunity Engagement Patrols**- the BCJI team partnered with the San Antonio Police Department to conduct community engagement patrols intended to build relationships with residents and businesses in hot spot areas

The BCJI grant was set to expire September 2016, and received an extension through March 2017. Some of the initiatives that continued after the grant expired, include the Resurgence Collaborative and the Group Violence Intervention.

A Healthy Community

A second recommendation from the MetroHealth Health Impact Assessment was to increase community amenities for physical activity. This need will be met by Bexar County and CoSA which has committed to building a linear park with exercise equipment along the walking path and a basketball court at one end of the park. The third recommendation from the HIA was to increase food security and access to fresh fruit and vegetables, as the Choice footprint is a food desert. To meet this need, Choice is collaborating with Neighborhood partners to establish an urban farm.

To support walkability efforts, a beautification strategy which includes the planting of more than 200 trees and art along key pathways will occur.

The Infill Housing and Rehabilitation Strategy is a key component to address the pervasive neighborhood deterioration and is another strategy in the CCI plan. The strategy involves land acquisition and investment for new homes and owner-occupied home repair. This strategy will utilize a place-based approach by expanding homebuyer assistance and increasing opportunities for owner-occupied housing rehabilitation assistance.

Economic Development is a key component of the greater revitalization and long-term success of the Eastpoint community. An Economic Development Committee has developed a plan for the area, which includes: provide assistance to existing businesses; attract a diversity of new businesses; create a vibrant commercial corridor that accommodates business activity and supports local residents; re-brand the community's image to attract the interest of the greater San Antonio community; and promote income diversity. One strategy that aligns with this plan is the business Façade improvement component of the Critical Community Improvement (CCI) plan. Choice partnered with San Antonio for Growth on the Eastside (SAGE) and funded twelve $25,000 grants were awarded to qualifying businesses for exterior improvements to their properties. Businesses include construction companies, hair salons, corner stores and restaurants.

Good Samaritan Veterans Outreach and Transition Center (GSVOTC)
As part of the Critical Community Improvements (CCI) Plan, an investment of $600,000 was made towards the rehab and redevelopment of this center. The project is a partnership between SAHA, the City of San Antonio and St. Philip's College and resulted in the successful repurposing and renovation of the historic Good Samaritan Hospital. Grand opening was held in August 2017. St. Philip's College will serve as the operational partner for activities and services.

B. Local Asset Management Plan

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

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

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

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

C. Rental Demonstration (RAD) Participations

i. Description of RAD Participation

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

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

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

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

Section VI. Administrative

A. Board Resolution and Certifications Compliance

The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.

See Appendix 1.

B. Documentation of Public Process

The beginning and end dates of when the Annual MTW Plan was made available for public review and the dates, location and number of attendees of public hearings must be provided. HUD reserves the right to request additional information to verify the MTW PHA has complied with public process requirements in the Standard MTW Agreement (or successor MTW Agreement).

The 2020 MTW Plan was posted for public comment on February 15, 2019. The draft Plan was posted on SAHA's website, and two hard copies were printed out and placed in the two main lobbies of the Central Offices. The public comment period closed on March 26, 2019, prior to the April 4 regular board meeting when the Board of Commissioners considered action on the Plan.

A variety of opportunities were provided for public comment, including via email to mtw@saha.org, by mail to 818 S. Flores, and at two public hearings. The second public hearing took place during the regular board meeting when the Board of Commissioners considered action on the Plan.

- Meetings for housing choice voucher participants, public housing residents, and landlords were held on March 13, 14, and 18, 2019:
    - March 13, 2019: Resident Council Training (49 attendees)
    - March 14, 2019: PH Meeting- General Occupancy (7 attendees)
    - March 14, 2019: AHP Meeting - Landlords (4 attendees)
    - March 14, 2019: AHP Meeting - Participants (62 attendees)
    - March 18, 2019: PH Meeting - Elderly/Disabled (60 attendees)
- March 19, 2019 SAFMR Committee Meeting: There were six commenters and three recommendations regarding alternatives.
- March 21, 2019 Public Hearing (during the Operations and Choice Neighborhood Committee meeting): There were no attendees who signed up to make public comments.
- April 4, 2019 Public Hearing (during the regular board meeting when the Board of Commissioners considered action on the Plan): There were three attendees who signed up and made public comments.

Public comments, a summary of comments, and staff responses are provided in Appendix 7.

C. Planned and Ongoing Evaluations

The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).

The Agency has no PHA-directed evaluations planned.

D. Lobbying Disclosures

The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).

The Agency did not engage in lobbying activities in FY2019. See Appendix 3.

Appendix 1: Resolutions and Certifications

The following will be included as Appendix 1 in the final plan as approved by the Board of Commissioners.

- Board Resolution
- Annual MTW Plan Certifications of Compliance

San Antonio Housing Authority
Resolution 5923

RESOLUTION 5923, AUTHORIZING THE PROPOSED 2019-2020 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), CAPITAL FUND PROGRAM PLAN (CFP), AND FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN

WHEREAS, the Board of Commissioners of the San Antonio Housing Authority, a public instrumentality, created pursuant to the laws of the State of Texas (SAHA), must approve the 2019-2020 Moving to Work (MTW) Agency Plan for fiscal year 2019-2020, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan) and the Capital Fund Program (CFP); and

WHEREAS, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2019-2020 MTW Agency Plan to the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, the Board further desires to authorize the Chairman and the President and CEO to execute and submit to HUD such certifications and other documents that they deem necessary or advisable in connection with the submission of the MTW Agency Plan.

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

1) Approves Resolution 5923, authorizing the proposed 2019-2020 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), Capital Fund Program Plan (CFP), and five-year Capital Improvement and Development Plan; and

2) Authorizes the Chair of the Board of Commissioners and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2019-2020 MTW Plan to HUD.

Approved the 4th day of April 2019.

Morris A. Stribling, DPM

Morris A. Stribling, DPM
Chair, Board of Commissioners

Attested and approved as to form:

David Nisivoccia
President and CEO

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2019), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.

(9) In accordance with 24 CFR 5.105(a)(2), HUD’s Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.

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

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

San Antonio Housing Authority
MTW PHA NAME

TX006
MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

David Nisivoccia
NAME OF AUTHORIZED OFFICIAL

President and CEO
TITLE

DocuSigned by:
David Nisivoccia
56092F5E7BB74DC...
SIGNATURE

4/15/2019
DATE

* ***Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***

Appendix 2: Annual Statement/Performance and Evaluation Report (HUD 50075.1) and Replacement Housing Factor (RHF) Plan - 2018/2019

The U.S. Department of Housing and Urban Development (HUD) issued Notice PIH-2016-21 (HA) on December 2, 2016. The notice "modifies the submission process for Capital Fund Program (CFP) 5-Year Action Plans (5YAPs) and Budgets (formerly referred to as Annual Statements). Public housing agencies (PHAs) with fiscal year ends (FYEs) on or after March 31, 2017, will be required to submit their CFP 5-Year Action Plans and Budgets within HUD's Energy Performance and Information Center (EPIC) system; the electronic CFP submission process will replace the current paper submission process." The notice further details "PHAs that operate Public Housing programs, participate in the CFP, and currently participate in the Moving To Work (MTW) demonstration include a description of capital activities as part of the MTW Plan annual submission process, as required by their MTW Agreements."

SAHA's CFP 5-Year Action Plan has been described further in Appendix 5.1.

PHA Plan Submission: In order to comply with the requirements of 24 CFR 903.7(g), PHAs are required to include a statement of capital improvements needed in the PHA Annual Plan. In the past, a PHA could satisfy this requirement by including copies of its Capital Fund Annual Statement/Performance and Evaluation Report (HUD 50075.1) and Capital Fund Program 5- Year Action Plan (HUD 50075.2) forms with the PHA Annual Plan. While the Capital Fund submission has been decoupled from the PHA Plan, PHAs are still required to incorporate information on capital improvement needs into the PHA Annual Plan. To satisfy this requirement, HUD is requiring PHAs to reference their latest HUD-approved Capital Fund 5- Year Action Plan covering the current Fiscal Year in their PHA Annual Plan, prior to submission of their PHA Annual Plan. PHAs can reference the form by including the following language in Section 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on 07/11/2018." During the PHA Plan review, HUD field office staff will not be required to review the previously-approved Capital Fund 5-Year Action Plan. HUD will consider the requirement to include a statement of capital improvements needed as satisfied by the reference to the previously-approved Capital Fund 5-Year Action Plan. For the purpose of the annual hearing, PHAs should provide a copy of the form that they reference in the PHA Annual Plan.

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
07/31/2017

Part I: Summary						
PHA Name : San Antonio Housing Authority **PHA Number:** TX006		**Locality (City/County & State)** ☐ **Original 5-Year Plan** ☒ **Revised 5-Year Plan (Revision No:)**				
A.	**Development Number and Name**	**Work Statement for Year 1** 2018	**Work Statement for Year 2** 2019	**Work Statement for Year 3** 2020	**Work Statement for Year 4** 2021	**Work Statement for Year 5** 2022
	AUTHORITY-WIDE	$12,332,100.00	$12,191,825.00	$12,191,825.00	$12,191,825.0	$12,191,825.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1	2018			
Identifier	**Development Number/Name**	**General Description of Major Work Categories**	**Quantity**	**Estimated Cost**
	AUTHORITY-WIDE (NAWASD)			$12,332,100.00
ID0001	Operations(Operations (1406))	PHA Wide Operations		$355,966.00
ID0002	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	PHA Wide Administration		$355,966.00
ID0003	CFFP Debt Service(Loan Debt Obligation (9002))	CFFP Debt Service		$2,192,650.32
ID0004	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		$9,427,517.68
	Subtotal of Estimated Cost			$12,332,100.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 2 2019

Identifier	**Development Number/Name**	**General Description of Major Work Categories**	**Quantity**	**Estimated Cost**
	AUTHORITY-WIDE (NAWASD)			$12,191,825.00
ID0005	Operations(Operations (1406))	PHA Wide Operations		$355,966.00
ID0006	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	PHA Wide Administration		$355,966.00
ID0007	CFFP Debt Service(Loan Debt Obligation (9002))	CFFP Debt Service		$2,192,650.32
ID0008	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		$9,287,242.68
	Subtotal of Estimated Cost			$12,191,825.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 3 2020

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			$12,191,825.00
ID0009	Operations(Operations (1406))	PHA Wide Operations		$355,966.00
ID0010	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	PHA Wide Administration		$355,966.00
ID0011	CFFP Debt Service(Loan Debt Obligation (9002))	CFFP Debt Service		$2,192,650.32
ID0012	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		$9,287,242.68
	Subtotal of Estimated Cost			$12,191,825.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 4 2021

Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			$12,191,825.00
ID0013	Operations(Operations (1406))	PHA Wide Operations		$355,966.00
ID0014	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	PHA Wide Administration		$355,966.00
ID0015	CFFP Debt Service(Loan Debt Obligation (9002))	CFFP Debt Service		$2,192,650.32
ID0016	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		$9,287,242.68
	Subtotal of Estimated Cost			$12,191,825.00

Part II: Supporting Pages - Physical Needs Work Statements (s)

Work Statement for Year 5 2022

Identifier	**Development Number/Name**	**General Description of Major Work Categories**	**Quantity**	**Estimated Cost**
	AUTHORITY-WIDE (NAWASD)			$12,191,825.00
ID0017	Operations(Operations (1406))	PHA Wide Operations		$355,966.00
ID0018	Administration(Administration (1410)-Salaries,Administration (1410)-Other,Administration (1410)-Sundry)	PHA Wide Administration		$355,966.00
ID0019	CFFP Debt Service(Loan Debt Obligation (9002))	CFFP Debt Service		$2,192,650.32
ID0020	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		$9,287,242.68
	Subtotal of Estimated Cost			$12,191,825.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1 2018	
Development Number/Name General Description of Major Work Categories	**Estimated Cost**
Housing Authority Wide	
Operations(Operations (1406))	$355,966.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$355,966.00
CFFP Debt Service(Loan Debt Obligation (9002))	$2,192,650.32
Assignment of Funds to MTW BLI(MTW (1492))	$9,427,517.68
Subtotal of Estimated Cost	$12,332,100.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 2 2019	
Development Number/Name **General Description of Major Work Categories**	**Estimated Cost**
Housing Authority Wide	
Operations(Operations (1406))	$355,966.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$355,966.00
CFFP Debt Service(Loan Debt Obligation (9002))	$2,192,650.32
Assignment of Funds to MTW BLI(MTW (1492))	$9,287,242.68
Subtotal of Estimated Cost	$12,191,825.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 3 2020	
Development Number/Name **General Description of Major Work Categories**	**Estimated Cost**
Housing Authority Wide	
Operations(Operations (1406))	$355,966.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$355,966.00
CFFP Debt Service(Loan Debt Obligation (9002))	$2,192,650.32
Assignment of Funds to MTW BLI(MTW (1492))	$9,287,242.68
Subtotal of Estimated Cost	$12,191,825.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4 2021	
Development Number/Name **General Description of Major Work Categories**	**Estimated Cost**
Housing Authority Wide	
Operations(Operations (1406))	$355,966.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	$355,966.00
CFFP Debt Service(Loan Debt Obligation (9002))	$2,192,650.32
Assignment of Funds to MTW BLI(MTW (1492))	$9,287,242.68
Subtotal of Estimated Cost	$12,191,825.00

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 5 2022	
Development Number/Name General Description of Major Work Categories	**Estimated Cost**
Housing Authority Wide	
Operations(Operations (1406))	$355,966.00
Administration(Administration (1410)-Salaries,Administration (1410)-Other,Administration (1410)-Sundry)	$355,966.00
CFFP Debt Service(Loan Debt Obligation (9002))	$2,192,650.32
Assignment of Funds to MTW BLI(MTW (1492))	$9,287,242.68
Subtotal of Estimated Cost	$12,191,825.00

Appendix 3: Lobbying Disclosures

Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071)

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB
0348-0046

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

1. Type of Federal Action:	2. Status of Federal Action:	3. Report Type:
[b] a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	[b] a. bid/offer/application b. initial award c. post-award	[a] a. initial filing b. material change **For Material Change Only:** year ______ quarter ______ date of last report ______

4. Name and Address of Reporting Entity:	**5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:**
[x] Prime [ ] Subawardee Tier ______, *if known*: San Antonio Housing Authority (TX006) 818 S. Flores St. San Antonio, TX 78204 **Congressional District**, *if known*:	**Congressional District**, *if known*:
6. Federal Department/Agency: U.S. Department of Housing and Urban Development Office of Public and Indian Housing	**7. Federal Program Name/Description:** Moving to Work (MTW) Demonstration Program CFDA Number, *if applicable*: ______
8. Federal Action Number, *if known*:	**9. Award Amount,** *if known*: $
10. a. Name and Address of Lobbying Registrant (*if individual, last name, first name, MI*): Not applicable	**b. Individuals Performing Services** (*including address if different from No. 10a*) (*last name, first name, MI*): Not applicable
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.	DocuSigned by: Signature: David Nisivoccia 56099277B7524D... Print Name: David Nisivoccia Title: President and CEO Telephone No.: (210) 477-6047 Date: 4/15/2019

Federal Use Only:	Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.

2. Identify the status of the covered Federal action.

3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.

4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.

5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.

6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizationallevel below agency name, if known. For example, Department of Transportation, United States Coast Guard.

7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.

8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."

9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.

10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

    (b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).

11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Applicant Name

San Antonio Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
David Nisivoccia	President and CEO

Signature	Date (mm/dd/yyyy)
DocuSigned by: David Nisivoccia 5609927B75274DC...	4/15/2019

Appendix 4: Preservation and Expansion of Affordable Housing Policy

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

A. Purpose

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

B. Goals

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

C. Priority Guidelines

SAHA has established a set of guidelines against which all properties are evaluated. These guidelines take into consideration the age and condition of the property, past property improvements and the amenities in the area, to include schools, shopping, transit and employment. In addition, projects located in areas where other community investment is being made or anticipated are given priority. These guidelines are applied to both preservation and expansion activities:

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

D. Portfolio Evaluation Process

In October 2013, at the direction of the President and CEO, an internal Physical Needs Assessment (PNA) Task Force was created, to develop a standardized, objective process to evaluate individual assets in the SAHA portfolio. On December 6, 2013, the Board of Commissioners was provided a presentation that summarized the results of the PNA, performed by Raba Kistner Associates, of SAHA's Public Housing and Beacon portfolios. The methodology was then utilized to identify and prioritize short-term and long-term initiatives to address the items identified in the PNA, while incorporating the goals and objectives outlined in SAHA's Affordable Housing Preservation & Expansion Policy, as adopted by the Board on May 12, 2011.

In 2017, SAHA began the initial evaluation process to procure a new Physical Needs Assessment (PNA). Upon the completion of the new PNA, SAHA will begin the evaluation process of individual assets throughout the agency's portfolio and subsequently, will amend and update the projected capital plan with high priority Life-Safety concerns and comprehensive modernization needs consistent with SAHA's goals.

P&E Policy: Units of Public Housing Preserved (MTW		
Unit of Measurement	**Baseline**	**Benchmark**
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	2462
Blanco	0	100
Cassiano	0	499
College Park	0	78
Fair Avenue	0	216
Parkview	0	153
San Pedro Arms	0	16
T.L. Shaley	0	66
Victoria Plaza	0	185
Highview Apts.	0	68
Le Chalet	0	34
Mirasol Homes	0	174
Morris Beldon	0	35
South San	0	30

Villa Tranchese	0	201
Villa Veramendi	0	166
Francis Furey	0	66
Olive Park	0	26
Kenwood North	0	53
Midway Apts.	0	20
College Park	0	78
Park Square	0	26
Village East	0	24
Escondida	0	20
Glen Park	0	26
Linda Lou	0	10
Matt Garcia	0	55
Pin Oak II	0	22
Williamsburg	0	15

P&E Policy: Units of Beacon Housing Preserved (Non-MTW)		
Unit of Measurement	**Baseline**	**Benchmark**
Number of housing units preserved	0	2811
Castle Point	0	220
Monterrey Park	0	200
Pecan Hill	0	100
Sunshine Plaza	0	100
Villa de Valencia	0	104
Woodhill	0	532
Burning Tree	0	108
Churchill Estates	0	40
Cottage Creek I & II	0	253/196
Courtland Heights	0	56
Encanta Villa	0	56
La Providencia	0	90
Reagan West	0	15
Villa de Valencia	0	104
Cottage Creek I	0	253
Homestead	0	157
Towering Oaks	0	128
Warren House	0	7
Bella Claire	0	67
Homestead	0	157
Villa de San Alfonso	0	29
Claremont	0	4
Crown Meadows	0	192

Appendix 5: Asset Management Plan

The Asset Management Plan outlines how the Agency's will make best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy, and includes the following four (5) elements:

- 5.1 Housing Expansion: New Housing Development Plans
- 5.2 Housing Preservation: Capital Improvement Plans
- 5.3 Acquisitions: Asset Acquisition Plans
- 5.4 Dispositions: Asset Disposition Plans
- 5.5 Other Real Estate Holdings

5.1: Housing Preservation: Capital Improvement Plans

Information below may change and all plans would be subject to funding and separate Board approval.

A. Public Housing Five Year Capital Improvement Plan

Over the five (5) years, the Agency plans to invest approximately $42 million in capital repairs to extend the useful life at 29+ properties. Projected funding for capital improvements is based on historical grants and forecasted capital fund appropriations by HUD.

Fiscal Year	Property	Description	Planned Investment
Current FY19	PHA Wide	Physical Needs Assessment (PNA)	$ 610,000
	Blanco	Basement Structural Repairs	420,000
	Cassiano	Offline Unit Restoration (7 units)	300,000
	Cassiano	Building Foundation	200,000
	College Park	Elevator #2 - Cylinder Replacement	75,000
	Fair Avenue	Sprinkler System/Fire Alarm Upgrade	2,000,000
	Park View	Roofing, Exterior Panels	1,300,000
	San Pedro Arms	Elevator Modernization	90,000
	T.L. Shaley	Fire Restoration (2 units)	220,000
	Victoria Plaza	Comprehensive Modernization	17,000,000
FY 20/CFP19	Highview	Storm Drainage Repairs	161,200
	Le Chalet	Substantial renovation	1,300,000
	Mirasol Homes	Roof Repairs/Replacement	1,209,800
	Morris Beldon	Substantial renovation	912,000
	South San Apts.	Drainage Repairs	161,200
	Villa Tranchese	Sprinkler System/Fire Alarm Upgrade	2,000,000
	Villa Veramendi	Roof Repairs/Replacement	950,000
	Various PH Properties	Installation of A/C Window Units	500,000
FY21/CFP20	Francis Furey	Substantial renovation	2,500,000
	Olive Park	Substantial renovation	1,800,000
FY22/CFP21	Kenwood North	Substantial renovation	900,000
	Midway	Substantial renovation	700,000
FY23/CFP22	College Park	Substantial renovation	750,000
	Park Square	Substantial renovation	1,000,000
	Village East	Substantial renovation	1,700,000
FY24/CFP23	Escondida	Substantial renovation	201,000

	Glen Park	Substantial renovation	950,000
	Linda Lou	Substantial renovation	200,000
	Matt Garcia	Substantial renovation	650,000
	Pin Oak II	Substantial renovation	150,000
	Williamsburg	Substantial renovation	650,000
		Total (1)	**$41,560,200**

(1) Funding sources may a combination of CFP, MTW and insurance proceeds.

B. Energy Performance Contract (EPC):

Staff are currently completing the evaluation and recommendation for a potential energy performance contract (EPC) involving approximately 2,400 public housing units. The soft and hard costs associated with installing energy conservation measures (ECM) will be funded by bank debt which will be serviced by energy cost savings.

C. Beacon Communities Five Year Capital Improvement Plan

Over the next five (5) years, the Agency plans to invest approximately $28 million in capital repairs to extend the useful life at 21 properties.

Fiscal Year	Property	Description	Planned Investment
Current FY19	Castle Point	Comprehensive modernization	$ 4,800,000
	Monterrey Park	Roof, Exterior Repairs, Parking Lot Repairs	3,000,000
	Pecan Hill	Plumbing, Site Drainage, Trees, HVAC	1,050,000
	Sunshine Plaza	Substantial Renovations (Elevators/Roofs/Windows/HVAC)	2,500,000
	Villa de Valencia	HVAC Replacement	500,000
	Woodhill	Building 23 & 24, Parking Lot Repairs	1,200,000
FY 2020	Burning Tree	PNA Priorities	2,000,000
	Churchill Estates	PNA Priorities, Privacy Fence, Repair Parking Lot/Drive	1,800,000
	Cottage Creek I & II	Parking Lots, Sidewalk Repairs	100,000
	Courtland Heights	Site Work, Landscape, Covered Parking, Pool Deck	150,000
	Encanta Villa	PNA Priorities	1,300,000
	La Providencia	Substantial Renovations (Plumbing/Exterior/Parking/Roof/HVAC)	2,000,000
	Reagan West	Roof Repairs/Replacement, Driveways	100,000
	Villa de Valencia	Roof Repairs/Replacement	500,000
FY 2021	Cottage Creek I	Update Fencing	60,000
	Homestead	Site Drainage, Retaining Walls	2,200,000
	Towering Oaks	Restripe Parking Lot; Refi Various	1,010,000
	Warren House	Repair Raised Bed	10,000
FY 2022	Bella Claire	Plumbing, Fence, Parking Lots; Refi Various	1,300,000
	Homestead	Roof Repairs/Replacement	800,000
	Villa de San Alfonso	Paint Trim, Parking Lot Repairs	100,000
FY 2023	Claremont	Roof Repairs/Replacement	50,000
FY 2024	Converse Ranch I	Paving; Refi Various	2,030,000
		TOTAL	**$ 28,560,000**

5.2: Housing Expansion: New Housing Development Plans

The Agency has a number of projects in the development pipeline. Information below may change and all plans would be subject to funding and separate Board approval.

Summary of Expansion Plan Impact

Proposed Project	Proposed Funding Mechanisms	Estimated Units	Estimated Affordable Units (<80% AMI)	Estimated Completion
1. Alazan Lofts	Mixed finance/9% Tax-credit/ Public Housing	85	85	FY2021
2. Artisan at Ruiz	Mixed finance/9% Tax-credit	102	102	FY2020
3. Majestic Ranch	100% Affordable/HUD 221 (d)(4)/4% Tax-credit/Bonds/MTW	288	100	FY2020
4. Mira Vista (5700 Culebra)	100% Affordable/HUD 221(d)(4)/4% Tax-credit/Bonds	300	300	FY2020
5. Our Lady of Charity Apartments	100% Affordable/9% & Historic Tax-Credits	93	93	FY2021
6. Tampico Lofts	Private Activity Bonds	200	100	FY2021
7. 100 Labor Street	HUD 221 (d)(4) loan/MTW	215	TBD	FY2020
8. The Oaks at Westlakes		268	134	FY2020
9. Mirasol - Westside Reinvestment Initiative	Former HOPE VI/Middle-Income Homeownership Program (MIHP)	87 (for sale)	NA	FY2020
10. St. John's Square	Private Activity Bonds/MTW	250	TBD	FY2022
11. FY2020-2: St. Phillips College, College Homeless Program	MTW	30	30	FY2021
	Total Units	Est. 1,918	Est. 991	

Project Descriptions:

1. **Alazan Lofts**

Developer: NRP Lonestar Development

The Alazan Lofts will be an approximately 85 unit housing development located on scattered sites surrounding the intersection of El Paso and Colorado Street, San Antonio, Texas. The development will be targeted specifically for working families and will consist of 85 tax credit units at 30 percent to 60 percent of area median income and market rate units. The new development will provide a mix of one-, two- and three-bedroom units with appropriate design considerations and amenities. NRP Development and SAHA partnered in January 2019 to submit a 9% application to the Texas Department of Housing and Community Affairs seeking tax credits for Alazan Lofts. Once completed, Alazan Lofts will represent the very best housing in terms of quality and sustainability in the marketplace today.

2. **Artisan at Ruiz**

Developer: Franklin Development

The developer has approached San Antonio Housing Authority (SAHA) with an opportunity to partner in the development of affordable, multi-family housing. Franklin and SAHA partnered in

January 2018 to submit a 9% application to the Texas Department of Housing and Community Affairs and was awarded 9% tax credits in July 2018. The Artisan at Ruiz will be an approximately 102 unit housing development located at Ruiz Street and Elmendorf Street, San Antonio, Texas. The development will be targeted specifically for working families and will consist of 102 tax credit units at 30 percent to 60 percent of area median income. The new development will provide a mix of two- and three-bedroom units with appropriate design considerations and amenities. The partnership will receive the benefit of the San Antonio Housing Facility Corporation's ad valorem tax exemption, as well as its sales tax exemption, and the agency will add units to its affordable housing portfolio, enabling the agency to serve more residents and further its mission. Franklin Development will provide ongoing guarantees and long term property management.

3. **Majestic Ranch**

Developer: Homespring Realty

This project is located on Callaghan Road and will be financed with private activity bonds and 4% Tax Credits, costing an estimated $44,471,593. Majestic Ranch will be 288 units with all of the units being 60% AMI with a mix of one bedroom, two bedrooms and three bedrooms. SAHA would have 100% ownership of this development after construction completion.

4. **Mira Vista** (aka 5700 Culebra)

Developer: Homespring Realty

The Mira Vista site is approximately 10 acres and will become a 300 unit multi-family development. The units will be a mix of one bedroom, two bedrooms and three bedrooms, all at 60% AMI. The total development cost is $43,454,716. San Antonio Housing Finance Corporation has been approved to issue up to $28,000,000 of Tax Exempt Bonds for this project. Mira Vista will be funded with the Tax Exempt Bonds and 4% Tax Credits. SAHA would have 100% ownership of this development after construction completion.

5. **Our Lady of Charity Apartments** (aka Convent Development)

Developer: Franklin Development

On October 25, 2018, SAHA received final approval from the U.S. Department of the Interior to add the Our Lady of Victory School as a contributing historical structure. As a result of this action, the convent building, laundry building, and Our Lady of Victory School building, all qualify for state and federal historic tax credits. This addition significantly improves the amount of funds that can be raised to help renovate the property as a mixed finance residential development for families and individuals.

SAHA is planning an affordable housing redevelopment of the historic convent property, two multifamily buildings, an abandoned former school building using a combination of state and federal historic tax credits and conventional 9% low income housing tax credits. In January 2019 SAHA submitted an application for 9% tax credits. This family development will consist of approximately 93 units with income limits of 60%, 50% and 30% of AMI. The property is located at 210 S Grimes and is bordered by Montana, Rio Grande, and the Springview Senior Public Housing Development.

6. **Tampico Lofts**

Developer: Mission DG, LTD

The Tampico Warehouse, located at 200 Tampico Street, is a non-dwelling building included as part of the Alazan/Apache courts public housing development. The site area is 3.763 acres or 163,934 square feet. A portion of the property is located in a 100 year floodplain, leaving a remaining usable area of approximately 3.624 acres or 157,853 square feet. The site is improved with a 9,568 square foot office/warehouse. Due to severe deterioration, the warehouse was given little to no value in the appraisal report dated October 30, 2017. The final opinion of value of the site is estimated at $1,210,000.

SAHA intends to redevelop the vacant land for the development and construction of a new multi-family apartment complex that is sustainable and located in close proximity to employment, education, health and economic development opportunities. SAHA selected Mission DG, LTD to co-develop the site. The development will be 200 multi-family units with a mix of affordable workforce housing and market rate units. SAHA is currently awaiting HUD approval for the demo/dispo application review and final approval is expected in May 2019. In addition, SAHA is in the process of authorizing the financing and construction of the new development and approving the San Antonio Housing Finance Corporation application for an allocation of private activity bonds.

7. 100 Labor Street

Developer: Franklin Development

Designs for a $45.6 million mixed-income apartment project north of the Lavaca neighborhood, which would be the fourth in the area by the San Antonio Housing Authority, received conceptual approval from the Historic and Design Review Commission. The project will consist of 215 apartments, a pre-cast parking structure, and four retail spaces on two parcels at the corner of East César E. Chávez Boulevard and Labor Street. The development also includes 11,000 square feet of amenity space for its residents, as well as the public.

A five-story brick-clad facade will face Hemisfair and the rest of downtown to the north. The development's height reduces as you head toward Lavaca's single-family homes. Labor Street will turn into a mini commercial corridor with the project's four retail spaces and a public courtyard. Four two-story townhomes are also included and will face Garfield Alley. This 215 unit multi-family, mixed-income project is currently in pre-development and is expected to have financing secured in Sept of 2019, with closing to follow soon after.

8. Oaks at Westlakes

An existing 268 unit multi-family project, located at 534 Hunt Ln, San Antonio, TX 78245, that SAHA would acquire with Millbrook Realty. The project will be substantially renovated and provide 50% of the units for residents making 80% of AMI or below. SAHA would receive 30% ownership of the development after purchase and a payment of $250,000. SAHA would also receive 30% of the cash flow along with an annual fee of $25,000.00.

9. Mirasol - Westside Reinvestment Initiative

In 2016, HUD approved an Addendum to the HOPE VI Mirasol Homeownership Neighborhoods Grant initially developed in the late 1990's. This program includes four neighborhoods: Blueridge, Villas de Fortuna, Palm Lake, and Sunflower.

Since implementation of the plan, forty (40) vacant homes in Blueridge and twenty-eight (28) vacant homes in Villas de Fortuna neighborhoods have been demolished. New construction of forty (40) homes in Blueridge and twenty-eight (28) in Villas de Fortuna are scheduled to be completed in March 2019 and the fall of 2019, respectively.

These newly constructed homes will use the Middle-Income Homeownership Program (MIHP), a "Nehemiah-like" homeownership program that was in effect at the time that SAHA received the

HOPE VI Mirasol Grant. The MIH Program allows sale of homes to families earning up to 100% of the area median income and 15% of the homes may be sold to families earning up to 115% of the area median income. Newly constructed homes have ranged from $124,900 to $154,000.

Nineteen (19) houses planned for rehabilitation in Palm Lake and Sun Flower have completed a physical assessment due to severe vandalism. The agency is waiting on the final report to determine if rehabilitation is still an option or if demolition is required. If demolition is recommended then SAHA will submit a formal request for a revision of the Addendum in order to obtain HUD approval to demolish the nineteen (19) houses and construct ten (10) new homes in the Palm Lake and nine (9) in the Sun Flower Subdivisions.

10. St. John's Square

Developer: Austin Fairchild Management/ Weal Development
The project is a 250 unit multi-family project.

11. St. Phillips College, College Homeless Program

Developer: To be determined
This project is planned to be sited on SAHA owned raw acreage that will serve homeless college students attending St. Phillips College. (See Section 3 for more details on the proposed MTW Activity, FY2020-2: St. Phillips College, College Homeless Program (SPC-HP)

5.3. Dispositions: Asset Disposition Plans

The Agency has a number of planned dispositions. Information below may change and all plans would be subject to separate Board approval.

Summary:

Plan	Property ID	Property Address
1. Section 32 Program / HOPE VI - Springview Homes Disposition	452504	238 CORLISS
	462032	518 CORLISS
	115632	2806 DEL RIO
	452413	126 FERRIS
	453698	526 J ST
	453718	614 J ST
	115673	2858 WYOMING
2. Post Auction/RTC/Former Lease-Purchase Portfolio Disposition	314106	7250 GLEN MIST
	441311	1071 POINSETTIA ST
	115411	1411 MONTANA
3. Large Parcel Dispositions	115731-115733; 115775-115789 (18)	Springview/Rosary: Lots on Government, S Rosary, Harnery, and Garcia
	100657	1310 S. Brazos
	1141452	Sutton 909 Runnels
4. Public Housing Scattered Site Disposition (see Section 2: Planned changes to PH housing stock for additional information)		94 PH Scattered Sites
5. Wheatley Choice Neighborhood Infill Strategy	380226	818 POINSETTIA
	441311	1071 POINSETTIA

	380324	939 POINSETTIA
	380325	943 POINSETTIA
	114316	1714 BURNET ST
	114317	1718 BURNET ST
	114103	1418 HAYS ST
	113931	1533 HAYS ST
	113932	1535 HAYS ST
	113919	519 ARTHUR ST
	113943	601 ARTHUR ST
	113944	607 ARTHUR ST
	113946	611 ARTHUR ST
	113770	1439 LAMAR
	113754	209 GABRIEL
6. Victoria Commons Townhome lots & Administrative Building	98 Lots and	

Plan Descriptions:

1. Section 32 Program / HOPE VI - Springview Homes Disposition

The Agency owns seven (7) properties under the Section 32 program. In September 2018, the Agency requested from HUD to rescind the Section 32 program for these homes. These properties were originally part of the HOPE VI Springview Grant. As part of the grant, the properties were designated for SAHA's Lease Purchase Homeownership Program. The homes were never purchased by a homeowner and the Lease Purchase Program ended in 2009 which coincidentally, was the beginning of the "housing foreclosure crisis" across the country. The homes have remained vacant for 10-20 years and have been severely vandalized. The level of repairs required to bring the homes up to code as required by Section 32 is currently not feasible for the Agency. It is also the desire of the neighborhood and overall community that the Agency dispose of these houses and provide an opportunity for others to acquire and rehabilitate them. These homes have become a nuisance to the community and unsustainable for the agency.

Because the original intent of the homes was to provide affordable housing to the community, the Agency will sell the houses with a Declaration of Restrictive Covenants that requires that the houses remain affordable for families and individuals earning up to 120% of area median income for 20 years. Due to current market conditions and the condition of the houses, it is important that we provide affordable housing to individuals that can be successful.

Once HUD approval of recission of the program is received, SAHA will then submit an application for disposition of these houses. Currently the request for rescission of the Section 32 program is pending.

2. Post Auction/RTC/Former Lease-Purchase Portfolio Disposition

SAHA has reduced its single family homes/lots portfolio to two (2) vacant homes and one (1) lots. These properties remain from previous auction sales or were former Lease-Purchase Program properties. Staff expects to dispose of these in the coming plan year.

3. Large Parcel Disposition

Springview/Rosary 3.13 acre parcel: The subject parcel was listed for sale on MLS. SAHA has received a purchase offer and is currently under contract for $220,000. the sale is expected to close in April 2019.

1310 S. Brazos: This 5.01 acre parcel, improved with a 98,587 square foot warehouse was advertised for a sealed bid auction in December 2018. There was one respondent to the bid and an offer of $2,200,000 was received. We expect the sale to close in the second quarter of 2019.

4. Public Housing Scattered Site Disposition

SAHA currently operates 163 single family housing units throughout the city of San Antonio. SAHA evaluated the scattered sites portfolio due to the high cost of managing and maintaining these units. An application for the disposition of 94 scattered sites was submitted to HUD in January 2017. The disposition application was approved by HUD on October 24, 2018.

SAHA staff have conducted eight (8) public meetings with impacted families outlining the project timeline, relocation benefits, and replacement housing options. Staff continues to assist clients in securing alternative housing options in the Public Housing Program or Section 8 Program. SAHA has secured updated appraisals and will market properties for sale via MLS as units vacate. Four homes have sold as of the preparation of this plan with the remaining expected to sell by June 30, 2019. Net sales proceeds after payment of transaction related costs will be invested in capital repair and/or replacement projects designed to preserve and extend the useful life of existing public housing assets.

Remaining PH Scattered Sites

The Agency is currently assessing the feasibility of managing the remaining 69 scattered sites and may explore disposition of these units subject to HUD approval of a new disposition application.

5. Wheatley Choice Neighborhood Infill Strategy

SAHA currently owns 15 parcels in the Choice Neighborhood Target site area. Conveyance of these parcels to the procured builder, Terramark, was approved by the board on February 7, 2019. SAHA will convey these properties to the builder in exchange for 15 affordable single-family houses that will be sold to families/individuals earning up to 120% of AMI and with a 20 year affordability restriction. Construction completion of these affordable homes will be June 2020. The lots to be conveyed are as follows:

519 Arthur	1718 Burnet	1439 Lamar
601 Arthur	209 Gabriel	818 Poinsettia
607 Arthur	1418 Hays	939 Poinsettia
611 Arthur	1533 Hays	943 Poinsettia
1714 Burnet	1535 Hays	1071 Poinsettia

6. Victoria Commons 98 Townhome lots & Administrative Building

SAHA will issue an RFQ/RFP for a Master Developer for the build out of the Victoria Commons townhome lots and redevelopment of the administration building site by the end of February 2019. Selected Master Developer will be procured by September 2019.

5.4: Acquisitions: Asset Acquisition Plans

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

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

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

Below is a list of current acquisitions plans.

Oaks at Westlakes: An existing 268 unit multi-family project, located at 534 Hunt Ln, San Antonio, TX 78245, that SAHA would acquire with Millbrook Realty. The project will be substantially renovated and provide 50% of the units for residents making 80% of AMI or below. SAHA would receive 30% ownership of the development after purchase and a payment of $250,000. SAHA would also receive 30% of the cash flow along with an annual fee of $25,000.00.

5.5: Other Real Estate Holdings

The agency may consider disposition projects not identified in the MTW plan if they are deemed excess inventory and not supportive of the 2020 Strategic Plan.

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

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

Below is a list of real estate holdings that may be subject to future development or disposition.

Property ID #	PROPERTY ADDRESS
109402, 109403	550 Brooklyn
409213, 409067, 409083, 409198	3940 San Fernando
124452	1706 Cincinnati
487399	7223 Snowden
1225304	440 Labor St
115808-115818	Springview 903-937 Hedges St.
115595	Springview 2603 Ezell
115597	Springview 2603 Ezell
115600	Springview 2607 Ezell
115602	Springview 2944 E. Commerce
115603	Springview Ezell (Easement Land)
115790	Springview 202 Garcia St.
115610	Springview Garcia St
115582	Springview 2407 Ezell

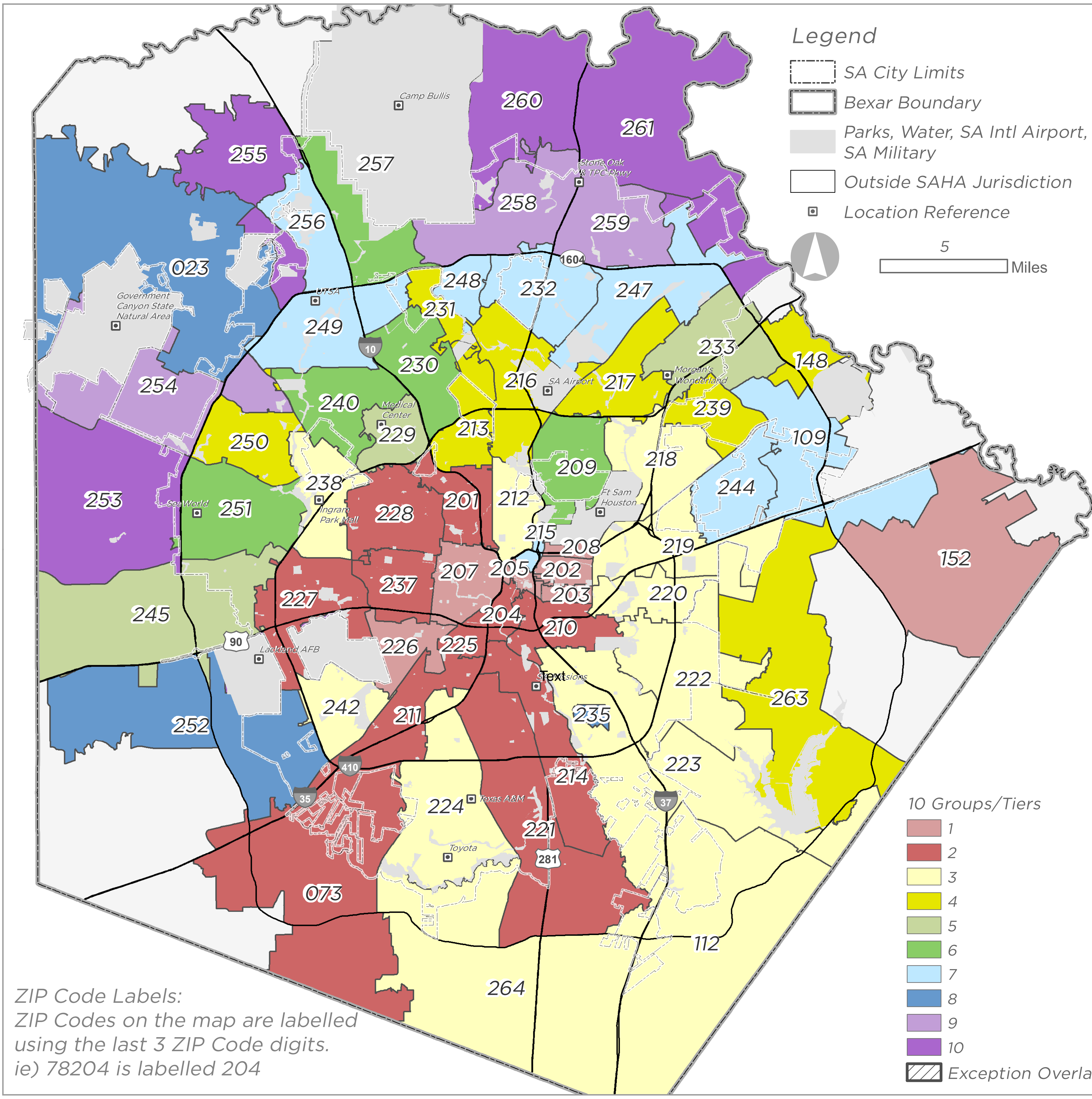
115583	Springview 2411 Ezell
115588	Springview 2902 E. Commerce
115589	Springview 2906 E. Commerce
115590	Springview 2910 E. Commerce
115807	Springview 651 S. Rio Grande
141735	509 Saltillo St
551676	1822 Arboleda St

Appendix 6: FY2019-1 Supplemental Maps and Tables

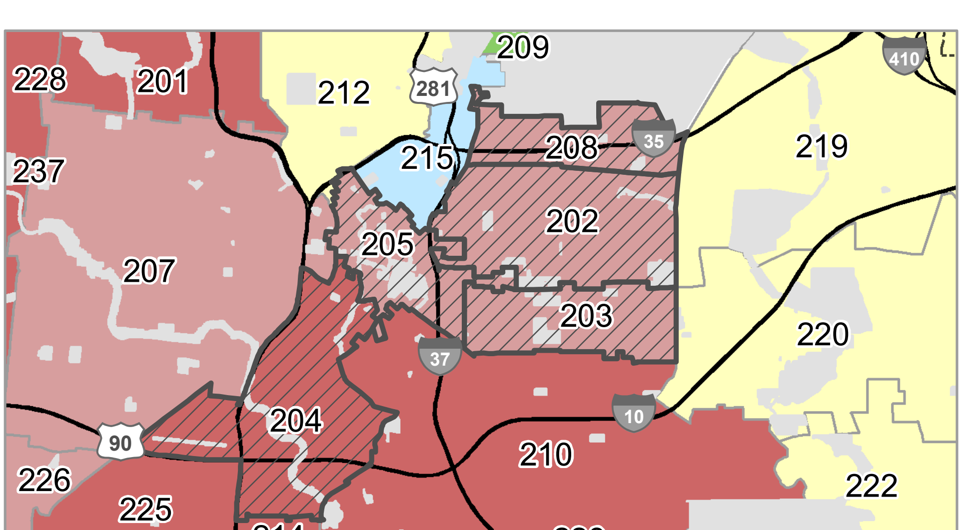
The following are included as Appendix 6.

- Ten (10) Tier Map that includes the exception overlay
- Payment Standard Summary Tables
- ZIP Code Lookup Tables
- Change Analysis
- HUD SAFMR Analysis

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. Payment Standards vary by Zip code and unit size. Please refer to the SAFMR Payment Standard Look-up Tables



Exception Overlay: The smaller map below shows the area covered by MTW SAFMR Exception Overlay.



ZIP Codes on the map are visualized using ZIP Code Tabulation Areas (ZCTAs). HUD uses ZCTA data from the American Community Survey to calculate most Small Area FMR values. In general, HUD equates the 5-digit ZCTA to a 5-digit ZIP Code. According to the Census Bureau, most ZCTAs are the same as ZIP Codes.

The U.S. Postal Service sets ZIP Code boundaries for the efficient delivery of mail and may therefore change ZIP code boundaries more frequently than the Census Bureau changes ZCTA boundaries. In the few cases where the ZIP Code for the property does not match the ZCTA containing the property, HUD allows the PHA the discretion to use either the Small Area FMR associated with the documented ZCTA for the address or the Small Area FMR corresponding to the ZIP Code associated with property address. (for more details: https://www.census.gov/ geo/reference/zctas.html)

CURRENT:
Tier 1 - 80% of MAFMR
Tier 2 - 110% MAFMR (subject to cap)
(Based on FY2018 HUD Published MAFMRs)

	Bedrooms						
Tier	**0**	**1**	**2**	**3**	**4**	**5**	**6**
1*	$519	$641	$801	$1,057	$1,283	$1,476	$1,668
2**	$714	$881	$1,101	$1,453	$1,764	$2,030	$2,294
90% of MAFMR	$584	$721	$901	$1,189	$1,444	$1,661	$1,877

*Tier 1 new contracts. Existing clients are held harmless at 90% of MAFMR

**Tier 2 subject to cap. Once cap is met, PS reverts back to 90% of MAFMR for new contracts.

PROPOSED*:
90% Min SAFMR - 10 Tiers
(Based on FY2019 HUD Published SAFMRs)

	Bedrooms						
Tier	**0**	**1**	**2**	**3**	**4**	**5**	**6**
1	$459	$567	$711	$936	$1,125	$1,294	$1,463
2	$504	$612	$774	$1,008	$1,224	$1,408	$1,591
3	$558	$684	$855	$1,125	$1,377	$1,584	$1,790
4	$612	$756	$936	$1,233	$1,503	$1,728	$1,954
5	$657	$801	$999	$1,314	$1,611	$1,853	$2,094
6	$684	$837	$1,044	$1,368	$1,683	$1,935	$2,188
7	$747	$918	$1,143	$1,503	$1,836	$2,111	$2,387
8	$792	$981	$1,215	$1,593	$1,953	$2,246	$2,539
9	$837	$1,026	$1,278	$1,683	$2,052	$2,360	$2,668
10	$918	$1,125	$1,395	$1,836	$2,250	$2,588	$2,925

*Dollar amounts may change as a result of new HUD SAFMRs expected to be published in August 2019.

Appendix 6: ZIP Code look up Table for Phase II

ZIP Code	Tier
78152	1
78202*	1
78203*	1
78205*	1
78207	1
78208*	1
78226	1
78073	2
78201	2
78204*	2
78210	2
78211	2
78214	2
78221	2
78225	2
78227	2
78228	2
78237	2
78112	3
78212	3
78218	3
78219	3
78220	3
78222	3
78223	3
78224	3
78238	3
78242	3
78264	3
78148	4
78213	4
78216	4
78217	4
78231	4
78239	4
78250	4
78263	4

ZIP Code	Tier
78229	5
78233	5
78245	5
78209	6
78230	6
78240	6
78251	6
78257	6
78109	7
78215	7
78232	7
78244	7
78247	7
78248	7
78249	7
78256	7
78023	8
78235	8
78252	8
78254	9
78258	9
78259	9
78253	10
78255	10
78260	10
78261	10
78266	10

* ZIP Codes covered by the excption overlay

	Phase I: 2 Tier Policy Map															Phase II: 10 Tier Market Map								CHANGE ANALYSIS - Phase I Compared to Phase II Payment Standards													
		New Contracts (80% Tier 1/110% Tier 2)							90% MAFMR								90% of Minimum SAFMR within Tier							Comparison: LOWEST available Phase I PS Compared to Proposed PS for each ZIP Code							Comparison: HIGHEST available Phase I PS Compared to Proposed PS for each ZIP Code						
ZIP Code	Tier	0	1	2	3	4	5	6	0	1	2	3	4	5	6	Tier	0	1	2	3	4	5	6	0	1	2	3	4	5	6	0	1	2	3	4	5	6
78205	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-125	-154	-190	-253	-319	-367	-414	-125	-154	-190	-253	-319	-367	-414
78208	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-125	-154	-190	-253	-319	-367	-414	-125	-154	-190	-253	-319	-367	-414
78226	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-60	-74	-90	-121	-158	-182	-205	-125	-154	-190	-253	-319	-367	-414
78207	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-60	-74	-90	-121	-158	-182	-205	-125	-154	-190	-253	-319	-367	-414
78202	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-125	-154	-190	-253	-319	-367	-414	-125	-154	-190	-253	-319	-367	-414
78203	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-125	-154	-190	-253	-319	-367	-414	-125	-154	-190	-253	-319	-367	-414
78152	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	1	459	567	711	936	1,125	1,294	1,463	-125	-154	-190	-253	-319	-367	-414	-255	-314	-390	-517	-639	-736	-831
78073	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78214	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78211	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78225	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78237	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78204	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-80	-109	-127	-181	-220	-253	-286	-80	-109	-127	-181	-220	-253	-286
78210	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78221	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78228	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78201	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78227	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	2	504	612	774	1,008	1,224	1,408	1,591	-15	-29	-27	-49	-59	-68	-77	-80	-109	-127	-181	-220	-253	-286
78220	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78223	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78219	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78222	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78238	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78242	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78112	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78218	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78224	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78264	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	39	43	54	68	94	108	122	-26	-37	-46	-64	-67	-77	-87
78212	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	3	558	684	855	1,125	1,377	1,584	1,790	-26	-37	-46	-64	-67	-77	-87	-156	-197	-246	-328	-387	-446	-504
78263	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	93	115	135	176	220	252	286	28	35	35	44	59	67	77
78148	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78216	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78239	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78250	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78213	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78217	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78231	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	4	612	756	936	1,233	1,503	1,728	1,954	28	35	35	44	59	67	77	-102	-125	-165	-220	-261	-302	-340
78245	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	5	657	801	999	1,314	1,611	1,853	2,094	138	160	198	257	328	377	426	73	80	98	125	167	192	217
78229	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	5	657	801	999	1,314	1,611	1,853	2,094	73	80	98	125	167	192	217	-57	-80	-102	-139	-153	-177	-200
78233	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	5	657	801	999	1,314	1,611	1,853	2,094	73	80	98	125	167	192	217	-57	-80	-102	-139	-153	-177	-200
78209	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	6	684	837	1,044	1,368	1,683	1,935	2,188	100	116	143	179	239	274	311	-30	-44	-57	-85	-81	-95	-106
78257	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	6	684	837	1,044	1,368	1,683	1,935	2,188	100	116	143	179	239	274	311	-30	-44	-57	-85	-81	-95	-106
78230	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	6	684	837	1,044	1,368	1,683	1,935	2,188	100	116	143	179	239	274	311	-30	-44	-57	-85	-81	-95	-106
78251	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	6	684	837	1,044	1,368	1,683	1,935	2,188	100	116	143	179	239	274	311	-30	-44	-57	-85	-81	-95	-106
78240	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	6	684	837	1,044	1,368	1,683	1,935	2,188	100	116	143	179	239	274	311	-30	-44	-57	-85	-81	-95	-106

	Phase I: 2 Tier Policy Map																Phase II: 10 Tier Market Map								CHANGE ANALYSIS - Phase I Compared to Phase II Payment Standards													
		New Contracts (80% Tier 1/110% Tier 2)							90% MAFMR								90% of Minimum SAFMR within Tier							Comparison: LOWEST available Phase I PS Compared to Proposed PS for each ZIP Code							Comparison: HIGHEST available Phase I PS Compared to Proposed PS for each ZIP Code						
ZIP Code	Tier	0	1	2	3	4	5	6	0	1	2	3	4	5	6	Tier	0	1	2	3	4	5	6	0	1	2	3	4	5	6	0	1	2	3	4	5	6
78215	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	163	197	242	314	392	450	510
78244	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	228	277	342	446	553	635	719	163	197	242	314	392	450	510
78109	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78232	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78249	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78256	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78248	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78247	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	7	747	918	1,143	1,503	1,836	2,111	2,387	163	197	242	314	392	450	510	33	37	42	50	72	81	93
78252	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	8	792	981	1,215	1,593	1,953	2,246	2,539	273	340	414	536	670	770	871	208	260	314	404	509	585	662
78235	1	519	641	801	1,057	1,283	1,476	1,668	584	721	901	1,189	1,444	1,661	1,877	8	792	981	1,215	1,593	1,953	2,246	2,539	208	260	314	404	509	585	662	208	260	314	404	509	585	662
78023	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	8	792	981	1,215	1,593	1,953	2,246	2,539	208	260	314	404	509	585	662	78	100	114	140	189	216	245
78254	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	9	837	1,026	1,278	1,683	2,052	2,360	2,668	253	305	377	494	608	699	791	123	145	177	230	288	330	374
78259	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	9	837	1,026	1,278	1,683	2,052	2,360	2,668	253	305	377	494	608	699	791	123	145	177	230	288	330	374
78258	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	9	837	1,026	1,278	1,683	2,052	2,360	2,668	253	305	377	494	608	699	791	123	145	177	230	288	330	374
78253	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	10	918	1,125	1,395	1,836	2,250	2,588	2,925	334	404	494	647	806	927	1,048	204	244	294	383	486	558	631
78255	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	10	918	1,125	1,395	1,836	2,250	2,588	2,925	334	404	494	647	806	927	1,048	204	244	294	383	486	558	631
78260	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	10	918	1,125	1,395	1,836	2,250	2,588	2,925	334	404	494	647	806	927	1,048	204	244	294	383	486	558	631
78261	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	10	918	1,125	1,395	1,836	2,250	2,588	2,925	334	404	494	647	806	927	1,048	204	244	294	383	486	558	631
78266	2	714	881	1,101	1,453	1,764	2,030	2,294	584	721	901	1,189	1,444	1,661	1,877	10	918	1,125	1,395	1,836	2,250	2,588	2,925	334	404	494	647	806	927	1,048	204	244	294	383	486	558	631

	HUD 2019 SAFMRs							Proposed PS (Phase II) by Bedroom Size								Proposed PS as % of 2019 HUD SAFMRs by Bedroom Size						
ZIP Code	0	1	2	3	4	5	6	Tier	0	1	2	3	4	5	6	0	1	2	3	4	5	6
78152	560	680	850	1,120	1,370	1,575	1,781	1	459	567	711	936	1,125	1,294	1,463	82%	83%	84%	84%	82%	82%	82%
78202*	540	660	820	1,080	1,320	1,518	1,716	1	459	567	711	936	1,125	1,294	1,463	85%	86%	87%	87%	85%	85%	85%
78203*	550	680	840	1,100	1,350	1,552	1,755	1	459	567	711	936	1,125	1,294	1,463	83%	83%	85%	85%	83%	83%	83%
78205*	510	630	790	1,040	1,250	1,437	1,625	1	459	567	711	936	1,125	1,294	1,463	90%	90%	90%	90%	90%	90%	90%
78207	520	640	790	1,040	1,270	1,460	1,651	1	459	567	711	936	1,125	1,294	1,463	88%	89%	90%	90%	89%	89%	89%
78208*	510	630	790	1,040	1,250	1,437	1,625	1	459	567	711	936	1,125	1,294	1,463	90%	90%	90%	90%	90%	90%	90%
78226	510	630	790	1,040	1,250	1,437	1,625	1	459	567	711	936	1,125	1,294	1,463	90%	90%	90%	90%	90%	90%	90%
78073	560	680	860	1,120	1,360	1,564	1,768	2	504	612	774	1,008	1,224	1,408	1,591	90%	90%	90%	90%	90%	90%	90%
78201	610	750	930	1,220	1,500	1,725	1,950	2	504	612	774	1,008	1,224	1,408	1,591	83%	82%	83%	83%	82%	82%	82%
78204	600	740	920	1,210	1,480	1,702	1,924	2	504	612	774	1,008	1,224	1,408	1,591	84%	83%	84%	83%	83%	83%	83%
78210	600	740	920	1,210	1,480	1,702	1,924	2	504	612	774	1,008	1,224	1,408	1,591	84%	83%	84%	83%	83%	83%	83%
78211	590	720	900	1,180	1,450	1,667	1,885	2	504	612	774	1,008	1,224	1,408	1,591	85%	85%	86%	85%	84%	84%	84%
78214	580	710	880	1,160	1,420	1,633	1,846	2	504	612	774	1,008	1,224	1,408	1,591	87%	86%	88%	87%	86%	86%	86%
78221	600	740	920	1,210	1,480	1,702	1,924	2	504	612	774	1,008	1,224	1,408	1,591	84%	83%	84%	83%	83%	83%	83%
78225	590	720	900	1,180	1,450	1,667	1,885	2	504	612	774	1,008	1,224	1,408	1,591	85%	85%	86%	85%	84%	84%	84%
78227	610	750	930	1,220	1,500	1,725	1,950	2	504	612	774	1,008	1,224	1,408	1,591	83%	82%	83%	83%	82%	82%	82%
78228	600	740	920	1,210	1,480	1,702	1,924	2	504	612	774	1,008	1,224	1,408	1,591	84%	83%	84%	83%	83%	83%	83%
78237	590	720	900	1,180	1,450	1,667	1,885	2	504	612	774	1,008	1,224	1,408	1,591	85%	85%	86%	85%	84%	84%	84%
78112	660	810	1,010	1,330	1,620	1,863	2,106	3	558	684	855	1,125	1,377	1,584	1,790	85%	84%	85%	85%	85%	85%	85%
78212	640	790	980	1,290	1,580	1,817	2,054	3	558	684	855	1,125	1,377	1,584	1,790	87%	87%	87%	87%	87%	87%	87%
78218	660	810	1,010	1,330	1,620	1,863	2,106	3	558	684	855	1,125	1,377	1,584	1,790	85%	84%	85%	85%	85%	85%	85%
78219	640	790	980	1,290	1,580	1,817	2,054	3	558	684	855	1,125	1,377	1,584	1,790	87%	87%	87%	87%	87%	87%	87%
78220	620	760	950	1,250	1,530	1,759	1,989	3	558	684	855	1,125	1,377	1,584	1,790	90%	90%	90%	90%	90%	90%	90%
78222	640	780	970	1,270	1,560	1,794	2,028	3	558	684	855	1,125	1,377	1,584	1,790	87%	88%	88%	89%	88%	88%	88%
78223	620	760	950	1,250	1,530	1,759	1,989	3	558	684	855	1,125	1,377	1,584	1,790	90%	90%	90%	90%	90%	90%	90%
78224	660	800	1,000	1,310	1,610	1,851	2,093	3	558	684	855	1,125	1,377	1,584	1,790	85%	86%	86%	86%	86%	86%	86%
78238	640	780	970	1,270	1,560	1,794	2,028	3	558	684	855	1,125	1,377	1,584	1,790	87%	88%	88%	89%	88%	88%	88%
78242	640	780	970	1,270	1,560	1,794	2,028	3	558	684	855	1,125	1,377	1,584	1,790	87%	88%	88%	89%	88%	88%	88%
78264	670	810	1,020	1,330	1,620	1,863	2,106	3	558	684	855	1,125	1,377	1,584	1,790	83%	84%	84%	85%	85%	85%	85%
78148	690	850	1,060	1,390	1,700	1,955	2,210	4	612	756	936	1,233	1,503	1,728	1,954	89%	89%	88%	89%	88%	88%	88%
78213	710	880	1,090	1,430	1,750	2,012	2,275	4	612	756	936	1,233	1,503	1,728	1,954	86%	86%	86%	86%	86%	86%	86%
78216	700	860	1,070	1,410	1,720	1,978	2,236	4	612	756	936	1,233	1,503	1,728	1,954	87%	88%	87%	87%	87%	87%	87%

	HUD 2019 SAFMRs							Proposed PS (Phase II) by Bedroom Size								Proposed PS as % of 2019 HUD SAFMRs by Bedroom Size						
ZIP Code	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**Tier**	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**0**	**1**	**2**	**3**	**4**	**5**	**6**
78217	710	870	1,080	1,420	1,740	2,001	2,262	4	612	756	936	1,233	1,503	1,728	1,954	86%	87%	87%	87%	86%	86%	86%
78231	710	880	1,090	1,430	1,750	2,012	2,275	4	612	756	936	1,233	1,503	1,728	1,954	86%	86%	86%	86%	86%	86%	86%
78239	700	860	1,070	1,410	1,720	1,978	2,236	4	612	756	936	1,233	1,503	1,728	1,954	87%	88%	87%	87%	87%	87%	87%
78250	700	860	1,070	1,410	1,720	1,978	2,236	4	612	756	936	1,233	1,503	1,728	1,954	87%	88%	87%	87%	87%	87%	87%
78263	680	840	1,040	1,370	1,670	1,920	2,171	4	612	756	936	1,233	1,503	1,728	1,954	90%	90%	90%	90%	90%	90%	90%
78229	730	890	1,110	1,460	1,790	2,058	2,327	5	657	801	999	1,314	1,611	1,853	2,094	90%	90%	90%	90%	90%	90%	90%
78233	750	920	1,140	1,500	1,830	2,104	2,379	5	657	801	999	1,314	1,611	1,853	2,094	88%	87%	88%	88%	88%	88%	88%
78245	740	910	1,130	1,480	1,820	2,093	2,366	5	657	801	999	1,314	1,611	1,853	2,094	89%	88%	88%	89%	89%	89%	89%
78209	760	930	1,160	1,520	1,870	2,150	2,431	6	684	837	1,044	1,368	1,683	1,935	2,188	90%	90%	90%	90%	90%	90%	90%
78230	770	940	1,170	1,540	1,880	2,162	2,444	6	684	837	1,044	1,368	1,683	1,935	2,188	89%	89%	89%	89%	90%	90%	90%
78240	790	960	1,200	1,580	1,930	2,219	2,509	6	684	837	1,044	1,368	1,683	1,935	2,188	87%	87%	87%	87%	87%	87%	87%
78251	780	960	1,190	1,560	1,910	2,196	2,483	6	684	837	1,044	1,368	1,683	1,935	2,188	88%	87%	88%	88%	88%	88%	88%
78257	760	930	1,160	1,520	1,870	2,150	2,431	6	684	837	1,044	1,368	1,683	1,935	2,188	90%	90%	90%	90%	90%	90%	90%
78109	840	1,030	1,280	1,680	2,060	2,369	2,678	7	747	918	1,143	1,503	1,836	2,111	2,387	89%	89%	89%	89%	89%	89%	89%
78215	830	1,020	1,270	1,670	2,040	2,346	2,652	7	747	918	1,143	1,503	1,836	2,111	2,387	90%	90%	90%	90%	90%	90%	90%
78232	840	1,030	1,280	1,680	2,060	2,369	2,678	7	747	918	1,143	1,503	1,836	2,111	2,387	89%	89%	89%	89%	89%	89%	89%
78244	850	1,050	1,300	1,710	2,090	2,403	2,717	7	747	918	1,143	1,503	1,836	2,111	2,387	88%	87%	88%	88%	88%	88%	88%
78247	860	1,050	1,310	1,720	2,110	2,426	2,743	7	747	918	1,143	1,503	1,836	2,111	2,387	87%	87%	87%	87%	87%	87%	87%
78248	850	1,040	1,290	1,690	2,070	2,380	2,691	7	747	918	1,143	1,503	1,836	2,111	2,387	88%	88%	89%	89%	89%	89%	89%
78249	840	1,030	1,280	1,680	2,060	2,369	2,678	7	747	918	1,143	1,503	1,836	2,111	2,387	89%	89%	89%	89%	89%	89%	89%
78256	840	1,030	1,280	1,680	2,060	2,369	2,678	7	747	918	1,143	1,503	1,836	2,111	2,387	89%	89%	89%	89%	89%	89%	89%
78023	890	1,090	1,360	1,780	2,180	2,507	2,834	8	792	981	1,215	1,593	1,953	2,246	2,539	89%	90%	89%	89%	90%	90%	90%
78235	900	1,110	1,380	1,810	2,220	2,553	2,886	8	792	981	1,215	1,593	1,953	2,246	2,539	88%	88%	88%	88%	88%	88%	88%
78252	880	1,090	1,350	1,770	2,170	2,495	2,821	8	792	981	1,215	1,593	1,953	2,246	2,539	90%	90%	90%	90%	90%	90%	90%
78254	930	1,140	1,420	1,870	2,280	2,622	2,964	9	837	1,026	1,278	1,683	2,052	2,360	2,668	90%	90%	90%	90%	90%	90%	90%
78258	970	1,190	1,480	1,940	2,380	2,737	3,094	9	837	1,026	1,278	1,683	2,052	2,360	2,668	86%	86%	86%	87%	86%	86%	86%
78259	940	1,160	1,440	1,890	2,320	2,668	3,016	9	837	1,026	1,278	1,683	2,052	2,360	2,668	89%	88%	89%	89%	88%	88%	88%
78253	1,020	1,250	1,550	2,040	2,500	2,875	3,250	10	918	1,125	1,395	1,836	2,250	2,588	2,925	90%	90%	90%	90%	90%	90%	90%
78255	1,040	1,270	1,580	2,080	2,540	2,921	3,302	10	918	1,125	1,395	1,836	2,250	2,588	2,925	88%	89%	88%	88%	89%	89%	89%
78260	1,040	1,270	1,580	2,080	2,540	2,921	3,302	10	918	1,125	1,395	1,836	2,250	2,588	2,925	88%	89%	88%	88%	89%	89%	89%
78261	1,040	1,270	1,580	2,080	2,540	2,921	3,302	10	918	1,125	1,395	1,836	2,250	2,588	2,925	88%	89%	88%	88%	89%	89%	89%
78266	1,040	1,270	1,580	2,080	2,540	2,921	3,302	10	918	1,125	1,395	1,836	2,250	2,588	2,925	88%	89%	88%	88%	89%	89%	89%

Appendix 7: Public Comment Documentation

- Public comments
- Public comment summary
- Staff responses to public comments

SAHA | SAN ANTONIO HOUSING AUTHORITY
Opportunity Lives Here

Comments on the proposed changes may be delivered by electronic mail to mtw@saha.org, submitted online at www.saha.org, or physically delivered to the following address:

ATTN: Policy & Planning
SAHA Central Office
818 S. Flores St., San Antonio, TX 78204

Comments:

The presenter Was very iNFormative. (Kristeen)
Didn't like all the people talking around
me. I think it would be a good
idea to ask people to silence phones, in the begining
disruptive. Plus mention keep talking down.

Thank you.

SAHA | SAN ANTONIO HOUSING AUTHORITY
Opportunity Lives Here

Jerry Don Reeves Jr.

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ATTN: Policy & Planning
SAHA Central Office
818 S. Flores St., San Antonio, TX 78204

Comments:

The Criminal history screening Policy is a good plan, The infestation plan is great Thank you

SAHA SAN ANTONIO HOUSING AUTHORITY
Opportunity Lives Here

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ATTN: Policy & Planning
SAHA Central Office
818 S. Flores St., San Antonio, TX 78204

Comments:

This was very * important and extreemly informative and So Very Helpful.
Thank you All for your Help, it was a great presentation.
So I appreciated all of this information.

Comments on the proposed changes may be delivered by electronic mail to mtw@saha.org, submitted online at www.saha.org, or physically delivered to the following address:

ATTN: Policy & Planning
SAHA Central Office
818 S. Flores St., San Antonio, TX 78204

Comments:

Applies to property search - SAHA should consider providing more than 15 business days. Consider 30 business days.

Question - Currently on 3yr Re-certification renewal already in progress; All paperwork already finalize; Does these new polices cause the current renewal to be needed to be re-certified in a year of start of new policies?

Question - Fair Market Value - Can it be obtain in advance to property search a year in advance?

Question - ~~Do~~

SAHA SAN ANTONIO HOUSING AUTHORITY
Opportunity Lives Here

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ATTN: Policy & Planning
SAHA Central Office
818 S. Flores St., San Antonio, TX 78204

Comments:

BED BUGS: When a tenant moves in the unit is inspected and there are no bed bugs (infestations). Tent moves in and within one yer SAHA inspects and finds bed bugs. Why is the landlord held liable?

Move out inspection: SAHA inspects a unit and approve prior to SAHA participant occupancy. Even though we inspect periodically when the tenant moves out SAHA does not inspect and the landlord is left holding the bag with numerous damages sometimes.

Public Comments Submitted via mtw@saha.org

EMAIL #01

--------- Forwarded message ---------
From: **'Sylvia' via MTW** <mtw@saha.org>
Date: Wed, Mar 13, 2019 at 9:17 AM
Subject: Policy change
To: mtw@saha.org <mtw@saha.org>

Unfortunately, I will not be able to attend BUT in reference to the subject **Insect Infestation** this should be a tenants responsibility and not the landlords. As a landlord I have the home professionally sprayed prior to a tenant moving in. I have experienced many tenants living in filth only due to the fact that they are to lazy to clean and do not respect the home because it is not theirs. I'm sure this applies to anyone that owns a home you yourself are reasponsible of having your home bug free whether by you doing it yourself or professionally done. It is costly to a landlord when a tenant moves out and has left the home a total wreck, holes and writings on the walls, doors broken from being kicked in, food left in refrigerator spoiled, and the list goes on. And yet as a landlord we are to turn around and make it move in ready spending on all these repairs while this tenant moves on to the next home you will provide. I know these tenants need assistance but they also need to know that if they take advantage of this help there should be consequences. I'm hoping this email does not go unheard because I'm sure many landlords are fustrated.

Sylvia

EMAIL #02

---------- Forwarded message ---------
From: **'Elida' via MTW** <mtw@saha.org>
Date: Thu, Mar 21, 2019 at 5:09 PM
Subject: Other
To: mtw@saha.org <mtw@saha.org>

To whom it may concern:

I am not writing about the proposal. While I applaud the ideas purposed to help homeless students. I would like to see an expansion of your pilot program with employers extend to every one on housing. There are many residents who need just assistance with getting there recertification to return to work.

Let me explain, I am a resident of SAHA I've lived at alazan for the past 7 years. I am a single parent of one child. My child is in elementary and since head start she has never missed a day of school, she's in the 5th grade and has a learning disability.

Although there have been years that I have worked me work history is not the greatest. I would have you know this is not due to education. Before coming to Alazan I had already completed my Masters degree.

I have applied for jobs with SAHA and had several interviews over the past 7 years. I use to be in jobs plus before it moved. I've even been on the section 3 . FSS will not help me because of the policy that says I already got assistance from jobs plus. I've even gone to your partner temp agencies, in fact that is my concern for writing.

You see I saw a few positions in work in texas to which I applied to the temp agency dependable solutions on Guadalupe St. I was contacted by text that the HR manager of SAHA wanted to talk to me yesterday. While I found that unprofessional I responded that I was still interested. I didn't get a response since the office is near me I went in, at first I was told that the person who texted me didn't work there then they told me I did not qualify for that kind of job. Mind you that I had interviews in the past for that same position Case Manager and housing specialist.

I am doing all I can to find work but I'm not getting many opportunities or assistance. I dont have transportation, summer is around the corner so I have to have child care ready. I don't understand why I'm not getting assistance when i have barriers to success. I just want an opportunity to work at SAHA even if its thru a temp agency. I have bad credit due to school loans and I've been told that financial literacy doesn't deal with that.

I would appreciate someone contacting me.

Sincerely

Elida

EMAIL #03

From: **Teri Bilby** <teri@saaaonline.org>
Date: Thu, Mar 21, 2019 at 5:04 PM
Subject: Please consider the San Antonio Apartment Association's concerns regarding the proposed Small Area Market Rents- letter attached
To: mtw@saha.org <mtw@saha.org>
Cc: Hector Morales <Hector@saaaonline.org>, Allison Cohen <allison@saaaonline.org>

Thank you.

Respectfully,
Teri Bilby
Teri Bilby| Executive Director
San Antonio Apartment Association
7525 Babcock Road | San Antonio, TX 78249
210.692.7797 | fax 210.692.7277 | cell 210.818.0464
www. saaaonline.org | teri@saaaonline.org

SAAA
San Antonio Apartment Association
advocate • educate • communicate

7525 Babcock Road • San Antonio, TX • 78249 • 210.692.7797 • Fax 210.692.7277 • www.saaaonline.org

March 21, 2019

To whom it may concern,

We are writing to express our concern regarding the proposed Small Area Fair Market Rent (SAFMR) plan as discussed in the SAFMR Alliance meetings held over the last 9 months.

We believe that the payment standards reductions will have a serious and lasting negative impact on the ability of Housing Choice Voucher (HCV) holders to choose where they live. By reducing the payment amount of vouchers in areas with high volume of affordable choices, rental housing providers will find it more difficult to work with the San Antonio Housing Authority (SAHA) HCV program, and participants will naturally find themselves with less choice in where to live in the areas they most depend upon.

Currently, working with the SAHA HCV program is a difficult choice for many rental housing providers. Delays in initial payments lasting months, onerous inspection processes, opaque abatement processes all make the program a difficult task for housing providers. Now, by reducing the payment amount for vouchers, many of our members will be forced to leave the program, or suffer serious financial consequences.

The San Antonio Apartment Association (SAAA) hopes to continue to work with SAHA to find new ways for HCV participants to move to areas of opportunity and to find open doors wherever they look. It is for this reason that we strongly believe that offering less than the average rents for those areas will put HCV participants at a disadvantage to the market, and we must rethink this proposal.

By offering a higher payment standard, for example of 90-99% of the average rent for the area, we can prevent these problems from occurring, while still providing the opportunity for HCV participants to move to areas of hopefully “high opportunities”, as aspired to by this Alliance.

We continue to be a resource for SAHA, and want to create a real and lasting collaborative effort to find a home for everyone.

Respectfully,

Teri Bilby

Teri Bilby, Executive Director

EMAIL #04

---------- Forwarded message ---------
From: **Mi Ciudad Es Mi Casa** <mycityismyhome@gmail.com>
Date: Tue, Mar 26, 2019 at 4:06 PM
Subject: My City My Home public comment 2019–2020 MTW Agency Plan
To: <mtw@saha.org>

As a member of the MTW Alliance, we do not agree with the proposed SAFMR program as it currently stands.

My City Is My Home has offered its resources to test out the proposed rates (attached) and finds that the SAFMR "below 90% FMR" is not adequate in increasing housing choice.

This information was shared with SAHA on Feb 4, 2019.

Currently, My City Is My Home helps voucher holders find homes at no cost. One tool we use is the Multiple Listing Service (MLS), which is used by Real Estate Agents. It has apartments, multi-family, and single-family homes.

Most of these homes on MLS are in the high rent areas where SAHA MTW SAFMR wants to increase home choice. These homes are not normally advertised on gosection8.com, craigslist, or other low rent websites.

When this report was run on Jan 31, 2019 we found that there would be 41% loss in homes we would be able to find on MLS using the SAFMR rates.

Though it has been requested, SAHA has not provided what the rates would be at 90% to 99.3% of SAFMR to see if the results would be any better.

SAHA has not used all the resources at its disposal to ensure it is using the correct approach.

For this reason, there should be no lowering of current voucher rates until SAHA can be sure that every home they lose, if and when rates are lowered, there will be another to replace it.

Thank you,

Rich Acosta
President

FY19 HUD Published - 90% Min SAFMR - 10 Groups
Each table shows what is available currently on MLS in each zipcode groups
Each group was done on different days within 1/2019, the table below shows combined groups totals as of 1/31/2019

This table shows a combined total of all groups	Homes currently on the market for rent	Meeting SAFMR Price	Homes that allow voucher holders to apply regardless of price	Homes that accepts voucher at SAFMR price
Total	1658	693	115	48
Percentage		42%	7%	3%

Group summary	Homes currently on the market for rent	Meets SAFMR Price	Currently allow vouchers regardless of price	Accepts voucher at SAFMR price
Group 1 Total	58	3	8	0
Current homes on market compared percentages		5%	14%	0%
Group 2 Total	146	32	22	8
		22%	15%	5%
Group 3 Total	237	40	28	3
		17%	12%	1%
Group 4 Total	195	70	10	3
		36%	5%	2%
Group 5 Total	182	98	10	6
		54%	5%	3%
Group 6 Total	253	54	3	0
		21%	1%	0%
Group 7 Total	263	185	25	20
		70%	10%	8%
Group 8 Total	41	27	6	6
		66%	15%	15%
Group 9 Total	148	81	2	1
		55%	1%	1%

Group 10 Total	139	103	2	1
		74%	1%	1%

Below are all the breakdowns for each Zip Code Group

Homes for rent in Group 1						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$567	20	1	$750 - 900	1	0
B2	$711	20	1	$1,999 – 2,400	1	0
B3	$936	17	1	$1,150 – 4,800	5	0
B4	$1,125	1	0	1250	1	0
B5	$1,294	0				
B6	$1,463	0				
Total		58	3		8	0
Percentage			5%		14%	0%

Homes for rent in Group 2						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$612	24	7	$495 - 2300	0	0
B2	$774	56	12	$695 - 2,500	11	6
B3	$1,008	52	2	$760 - 2,150	7	2
B4	$1,224	14	11	$950 - 1,850	4	0
B5	$1,408	0				
B6	$1,591	0				
Total		146	32		22	8
Percentage			22%		15%	5%

Homes for rent in Group 3						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$684	31	9	$350 – 1,600	2	0
B2	$855	49	10	$650 – 3,200	2	1
B3	$1,125	114	19	$750 – 3,700	16	2
B4	$1,377	40	2	$1,000 – 2,200	8	0
B5	$1,584	3	0	$1,700 – 2,500	0	0
B6	$1,790	0				
Total		237	40		28	3
Percentage			17%		12%	1%

Homes for rent in Group 4						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$756	14	5	$650 – 1,300	1	1
B2	$936	39	18	$700 -2,587	1	1
B3	$1,233	119	39	$800 – 1,450	7	1
B4	$1,503	20	8	$825 – 2,450	1	0
B5	$1,728	3	0	$1,900 – 3,500	0	0
B6	$1,954					
Total		195	70		10	3
Percentage			36%		5%	2%

Homes for rent in Group 5						
Bedrooms	SAFMR Price	Homes currently on the market for rent	Meets SAFMR Price	Rent ranges	Currently allow vouchers regardless of price	Accepts voucher at SAFMR price
B1	$801	6	2	$700 – 1,595	1	1
B2	$999	27	15	$875 – 1,275	0	0
B3	$1,314	111	63	$975 – 3,495	5	4
B4	$1,611	33	15	$1,095 – 2,700	3	1
B5	$1,853	5	3	$1,600 – 2,400	1	0
B6	$2,094					
Total		182	98		10	6
Percentage			54%		5%	3%

Homes for rent in Group 6						
Bedrooms	SAFMR Price	Homes currently on the market for rent	Meets SAFMR Price	Rent ranges	Currently allow vouchers regardless of price	Accepts voucher at SAFMR price
B1	$837	26	9	600 – 3,780	0	0
B2	$1,044	58	7	$675 – 1,250	0	0
B3	$1,368	124	29	$1,050 – 5,000	3	0
B4	$1,683	36	9	$1,350 – 9,500	0	0
B5	$1,935	8	0	$2,000 – 9,500	0	0
B6	$2,188	1	0	5900	0	0
Total		253	54		3	0
Percentage			21%		1%	0%

Homes for rent in Group 7						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$918	4	1	$700 – 1,250	0	0
B2	$1,143	30	15	$795 – 2,350	3	3
B3	$1,503	158	116	$850 – 2,450	18	13
B4	$1,836	63	46	$1,000 – 3,700	3	3
B5	$2,111	8	7	$1,299 – 6,800	1	1
B6	$2,387					
Total		263	185		25	20
Percentage			70%		10%	8%

Homes for rent in Group 8						
Bedrooms	**SAFMR Price**	**Homes currently on the market for rent**	**Meets SAFMR Price**	**Rent ranges**	**Currently allow vouchers regardless of price**	**Accepts voucher at SAFMR price**
B1	$981	1	0	1850	0	0
B2	$1,125	2	2	$950 – 1,060	0	0
B3	$1,593	24	17	$1,100 – 2,900	6	6
B4	$1,953	13	7	$1,375 – 3,950	0	0
B5	$2,246	1	1	1575	0	0
B6	$2,539	0				
Total		41	27		6	6
Percentage			66%		15%	15%

Homes for rent in Group 9						
Bedrooms	SAFMR Price	Homes currently on the market for rent	Meets SAFMR Price	Rent ranges	Currently allow vouchers regardless of price	Accepts voucher at SAFMR price
B1	$1,026	0				
B2	$1,278	2	2	$875 – 1,150	0	0
B3	$1,683	61	31	$1,200 – 3,950	1	1
B4	$2,052	68	38	$1,300 – 4,500	1	0
B5	$2,360	17	10	$1,700 – 5,495	0	0
B6	$2,668	0				
Total		148	81		2	1
Percentage			55%		1%	1%

Homes for rent in Group 10						
Bedrooms	SAFMR Price	Homes currently on the market for rent	Meets SAFMR Price	Rent ranges	Currently allow vouchers regardless of price	Accepts voucher at SAFMR price
B1	$1,125	0				
B2	$1,395	1	0	1525	0	0
B3	$1,836	67	45	$1,250 – 3,250	1	1
B4	$2,250	53	45	$1,425 - $6,300	1	0
B5	$2,588	17	13	$1,795 – 3,900	0	0
B6	$2,925	1	0	3500	0	0
Total		139	103		2	1
Percentage			74%		1%	1%

EMAIL #05

---------- Forwarded message ---------
From: **Amelia Adams** <amelia@texashousing.org>
Date: Tue, Mar 26, 2019 at 4:59 PM
Subject: Comments from SAFMR Committee members re: MTW Plan
To: <mtw@saha.org>

Attached is a letter from four SAFMR Committee members regarding the MTW Plan. Thank you for the opportunity to comment.

Amelia

--
Amelia Clare Adams
Community Planner
Fair Housing and Disaster Recovery Analyst
Texas Housers
510.418.7480

March 26, 2019

San Antonio Housing Authority
818 S. Flores St.
San Antonio, TX 78204
Delivered via email to mtw@saha.org

Re: Proposed 2019-2020 MTW Plan Comments

To Whom it May Concern;

As residents of San Antonio and members of the SAFMR Committee tasked with providing guidance on the policy implementation, we wish to submit the following comments regarding SAHA's Proposed 2019-2020 MTW Agency Plan.

SAHA should be required to comply with its obligation to implement SAFMRs.

The San Antonio Housing Authority (SAHA) should be required to immediately comply with its obligation to implement Small Area Fair Market Rents (SAFMR) in the San Antonio-New Braunfels Metro Area according to the schedule calculated by the United States Department of Housing and Urban Development (HUD). HUD should not approve any waiver requested by SAHA regarding this matter.

We understand that SAHA has an MTW designation, which allows it certain flexibility in implementation of its SAFMR payment standards (as well as in other policy areas). However, we do not believe that this authorizes SAHA to evade the intention of the SAFMR rule to deconcentrate vouchers or to ignore the third statutory objective[1] of the Moving to Work program, which is to increase housing choice for low-income families.

The proposal to implement local small area fair market rent standards issued by SAHA in the Proposed 2019-2020 MTW Plan does not advance the goals of deconcentrating vouchers and increasing housing choices for Section 8 program participants. Instead, SAHA's policy will only reinforce existing patterns of housing segregation and it will have a negative impact on Section 8 participants.

SAHA seeks a waiver that would allow it to issue vouchers at payment standards far below the Fair Market Rents for zip codes across San Antonio. SAHA should not be granted this waiver. If a waiver is granted, it will result in a discriminatory effect on SAHA Section 8 voucher holders. Those families who live in low-income neighborhoods will receive less assistance while those who hope to move to less segregated neighborhoods with higher

[1] HUD, Moving to Work (MTW) FAQ, available at https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/faq.

opportunities will not be able to afford the transition. By using payment standards as low as 81% of those recommended by HUD, SAHA's policy will not meaningfully impact housing choice for program participants.

Higher Payment Standards are Needed to Overcome Existing Voucher Segregation.

As SAHA is aware, HUD included San Antonio-New Braunfels in the list of metro areas asked to implement SAFMRs because (1) its levels of voucher segregation are extremely high, and (2) using new, more local payment standards would potentially allow voucher holders access to rental homes that were located in lower poverty areas. (Two criteria for selection written in the 2016 rule[2] are that the jurisdiction has a sufficient vacancy rate and that there are a good number of rental units in zip codes where the SAFMR is more than 110 percent of the metro FMR. In other words, there are available homes for rent, but they are currently out of reach financially for Housing Choice Voucher holders.)

It's important to note here that voucher holders in San Antonio are disproportionately people of color. Many are disabled. While voucher holders don't constitute a protected class under Fair Housing and civil rights law, they do represent members of protected classes in much higher numbers than the population as a whole. This means that the concentration of voucher holders in high-poverty areas also amounts to racial and ethnic segregation, keeping these groups in areas with low-performing schools, poor amenities and fewer job opportunities.

Because the San Antonio-New Braunfels metro area meets HUD's criteria, the purpose of SAFMRs is to make these areas more financially accessible, thus breaking up the existing concentrations of voucher holders and giving individual households more choice in where they live. If SAHA is going to loosen the economic restrictions currently on these voucher holders, the payment standards it offers will need to go beyond the current 81-90% SAFMR that the plan offers.

While the MTW proposal recognizes that "San Antonio is economically segregated" and that "voucher holders are concentrated in certain areas," SAHA fails to discuss racial segregation in San Antonio. This omission is significant because San Antonio's housing market is racially segregated. The proposal does not explain how the proposed SAFMR tiers would address racial segregation in housing in San Antonio and the greater region.

Moreover, SAHA falls short of acknowledging its own role in maintaining racial and economic segregation in our city. By failing to provide vouchers with payment standards sufficient to meet the fair market rents across the city, SAHA's proposal will continue to

[2] Federal Register Vol. 81, No. 221, Wednesday, November 16, 2016

steer voucher holders into concentrated poverty in segregated neighborhoods. With payments standards set as low as 81% of the small area fair market rents published by HUD, vouchers will not be sufficient to pay for rents in higher opportunity areas.

Failing to acknowledge racial segregation prevents SAHA from developing policies that will meaningfully address residential segregation on the basis of race and other classes protected by the FHA (e.g., persons with disabilities, families with children), in addition to the economic segregation of voucher households.

The Success of SAHA's Mobility Pilot Program Depends on Adequate Payment Standards.

As we know, there are many non-financial barriers in place for voucher holders who hope to move out of areas of concentrated poverty and into neighborhoods with quality schools, safe streets and ample amenities. For example, they face landlord refusal to accept their vouchers, which is unfortunately legal under Texas law. They may not have experience with these neighborhoods, transportation to get there, existing social networks, and other tools that would make moving there easier. This is the reason why SAHA is working on developing a mobility program that comprehensively addresses these and other issues, both financial and otherwise. This is a huge and important step in providing voucher households with greater access to areas where they can find work, their kids can attend a good school, and their quality of life can be improved.

However, in order to run a robust mobility program, SAHA must use payment standards that allow residents access to these areas that have historically been off limits. The program can't do its job if we don't offer more rental assistance in areas we know to be more expensive.

In order for the Mobility Program to be effective at both recruiting prospective Section 8 landlords and assisting Section 8 voucher holders and their families with their move to safer neighborhoods with high-quality schools and low poverty, then SAHA must set the payment standard at the SAFMR levels as published by HUD.

The lack of an adequate payment standard will create a key barrier to housing choice and mobility for Section 8 voucher holders and will perpetuate the concentration of Section 8 voucher holders in high poverty areas of San Antonio. In addition, the lack of an adequate payment standard will fail to recruit the necessary prospective Section 8 landlords in high opportunity areas of San Antonio and contribute to fewer rental housing units accepting Section 8 vouchers being available in areas of San Antonio that offer easier access to safe neighborhoods, quality schools, job opportunities, safe parks, banking institutions, healthy foods, health care, and other important services.

There Must Be an Opportunity for Voucher Holders to Live in the Central City.

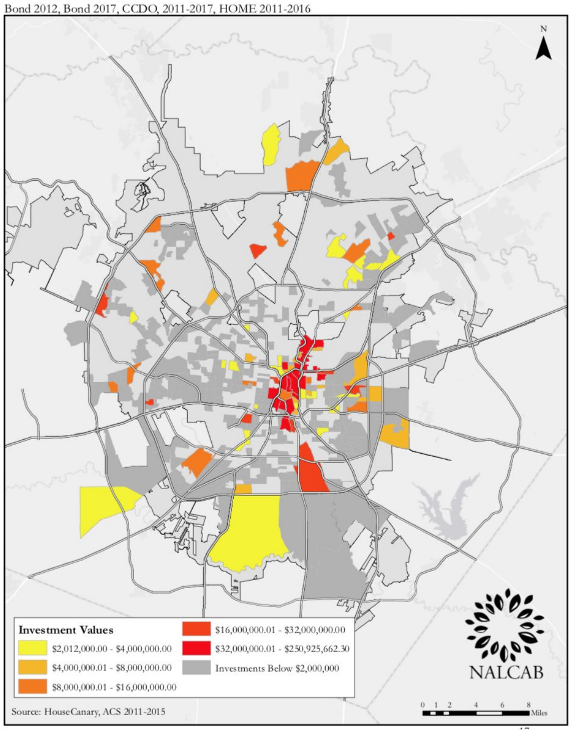
At the same time, the landscape of San Antonio is shifting. The northern areas offer great schools and clean streets, but they may not be ideal for all voucher households. As San Antonio invests in and redevelops our central city, more jobs and opportunities are available in and around the central business district. For some households using vouchers, especially those with no personal transportation, this may be an area of opportunity.

However, the current payment standards consider these areas among the lowest assistance tiers. This is likely due at least in part to data lag in the SAFMRs that doesn't account for the rapid forces of neighborhood change. Hundreds of units are being built each year in the areas in and around the CBD, many of them market rate.

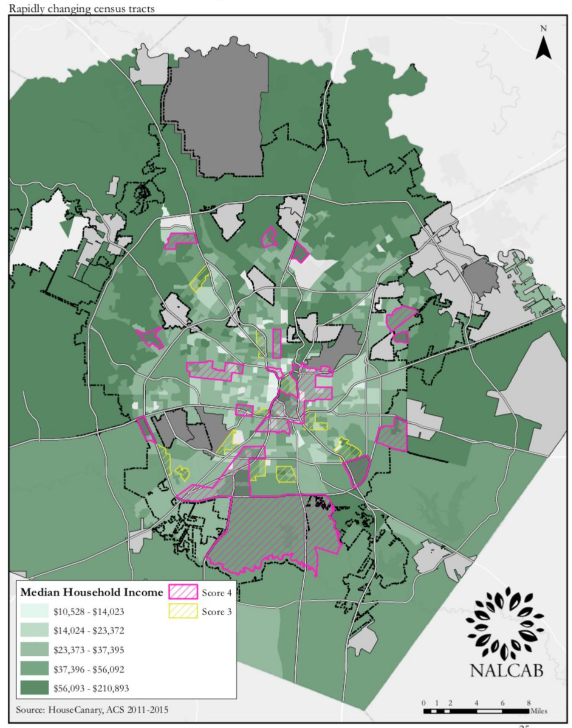
While the "exception overlay" does allow for households already residing in these rapidly changing areas to petition for continued assistance, it does not allow for new households to move into these areas with increased payment standards. The proposed payment standards essentially create a policy in which the central areas, where the majority of new development and amenities are being sited, will be off limits to voucher holders in the future. Given that these are the areas best served by transit, with a large concentration of tourism and service sector jobs, reducing the opportunity for voucher holders to live near downtown is a misstep that must be corrected.

Housing choice doesn't simply mean the choice to move to the majority-white suburbs. Voucher holders should also be able to participate in the increased opportunity that is being brought to areas like the Pearl, the Broadway corridor and Southtown. After all, much of this is being paid for in whole or in part through our collective tax dollars. (See NALCAB's map of Aggregate CoSA Investments below). It is crucial to recognize that these areas are now offering different benefits than they once did. Many of these additions are those that would improve a household's job prospects, mobility, access to essential goods and services, and social support networks.

Aggregate City of San Antonio Investments
Bond 2012, Bond 2017, CCDO, 2011-2017, HOME 2011-2016



Neighborhood Trend Analysis 2000-2015
Rapidly changing census tracts



For this reason, many on the SAFMR Committee expected that the exception areas would offer more than the ability to stay in place for families who already live in these neighborhoods before they experienced rapid investment and change (see NALCAB Neighborhood Change map above). We expected that these areas were identified because market rents there are higher than SAFMRs indicate. We expected that payment standards would be higher in these areas or that the policy would provide some form of flexibility to allow families to utilize their vouchers there.

SAHA's current use of the exception overlay does not meet this need. Instead, exception areas are defined for the limited purpose of making existing voucher households (who currently have a lease within these exception areas) eligible to apply for a hardship waiver (see comments on Hardship Policy below). While it is important to ensure that existing households can remain in place, this policy does nothing to provide ongoing access to these neighborhoods. As it stands, the policy accepts that new voucher households will not be able to find housing in some of the city's most amenity- and opportunity-rich areas. This is not in line with the goals of SAFMR and is especially problematic when SAHA has the MTW flexibility to adjust their policy to reflect actual market conditions.

SAHA Must Find Means of Expand Housing Choice Other Than Participant Attrition.

SAHA has failed to holistically examine its budget and operations to find ways of meeting its goals. SAHA estimates that implementing small area fair market rents according to the schedule determined by HUD would result in "$2.8M in increased annual HAP expenditures."[3] The proposed policy makes the assumption that this increase in expenditures must be balanced by decreasing the number of households served by the Section 8 Program, with an estimated loss of "387 vouchers over a three year period."[4] In making this assumption, SAHA has failed to explore other solutions within its budget. To meet its stated objectives of increasing housing choices for low-income families and maintaining the number of households served, SAHA must examine cost saving measures other than shrinking the size of the Section 8 Program by attrition.

For instance, SAHA has not addressed whether there is enough money in its voucher reserves to cover the costs of implementing SAFMR as determined by HUD. In January 2018, the United States Government Accountability Office released a report regarding the need to better monitor Moving to Work Agencies.[5] The report stated that "HUD has not implemented a process to better monitor MTW reserves or agencies' plans for such reserves, which led to agencies accruing relatively large amounts of unused funds that could be used for vouchers."[6] SAHA could utilize its reserves to balance the additional costs of SAFMR implementation. To the extent that SAHA has reserves, SAHA should consider using these funds to cover any higher costs of implementing HUD's SAFMR policy. SAHA must find ways of decreasing concentration of Section 8 vouchers in poor and segregated neighborhoods, allow families the choice of living in rapidly gentrifying neighborhoods and neighborhoods of opportunity, while maintaining the number of households served.

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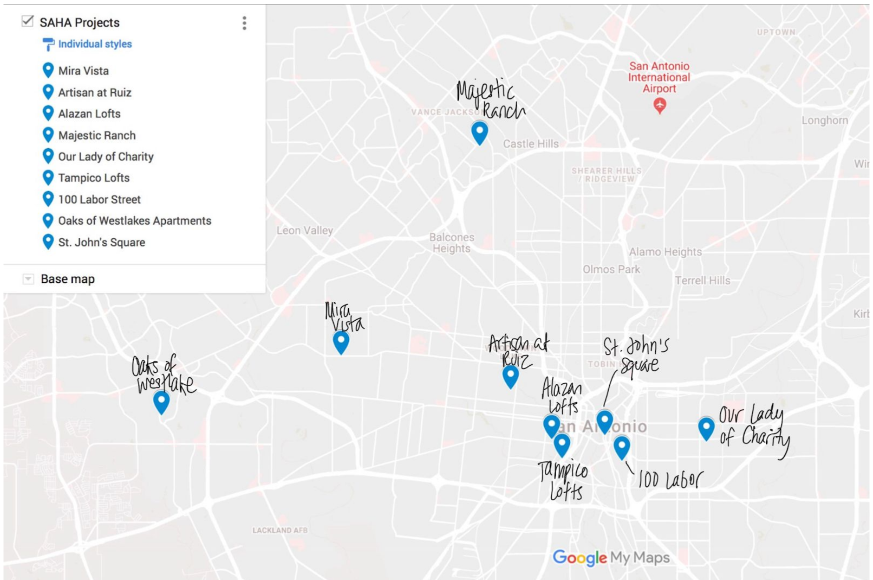
[3] San Antonio Housing Authority, Proposed 2019-2020 MTW Agency Plan, Sec. III Proposed MTW Activities 23 (February 15, 2019), available at https://saha.org/images/DRAFTMTW2020Plan2152019_Section3.pdf.
[4] *Id.*
[5] See generally United States Government Accountability Office, "*Improvements Needed to Better Monitor the Moving to Work Demonstration, Including Effects on Tenants*" January 2018, available at https://www.gao.gov/assets/690/689583.pdf.
[6] *Id.* at 2.



We believe it is also noteworthy that SAHA is building market rate housing in areas where the payment standard is decreasing. The map above indicates the locations of the SAHA projects listed in the MTW Plan, almost all of which are located in zip codes whose payment standards will be dropping based on SAHA's planned implementation. In these zip codes, SAHA is simultaneously lowering it's payment standards for vouchers while building housing that will be unaffordable to voucher holders. Even those projects that include or consist entirely of "affordable" units are counting units that are affordable to those making 80% of AMI or less, not those in very or extremely-low income brackets (60% AMI or lower and 30% or lower, respectively). We need housing for households at all income levels. As projects like these are developed, they will increase the average rent in the surrounding area, making the payment standards proposed by SAHA that much more inadequate to obtain rental housing.

The Proposed Hardship Policy Is Insufficient to Aid Those Negatively Impacted by the SAMFR Policy.

The proposed hardship policy requires rent-burdened families to initiate a request for a hardship waiver.[7] Despite placing the burden on the voucher holder to request the waiver, the proposal contains no information regarding how tenants will be informed of their right to apply. Without a robust outreach effort, including multiple contacts through multiple means of communication, voucher holders will not have sufficient information to access hardship waivers. Even if tenants are properly notified of their ability to apply for these waivers, many will lack the time, resources, fluency, and schedule flexibility to navigate the bureaucratic hurdles.

[7] San Antonio Housing Authority, Proposed 2019-2020 MTW Agency Plan, Sec. III Proposed MTW Activities 26 (February 15, 2019), available at https://saha.org/images/DRAFTMTW2020Plan2152019_Section3.pdf.

For tenants who request a hardship waiver "based on the risk of eviction for non-payment of rent or utilities," the policy requires that the family submit 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."[8] There are significant problems with this requirement. First, there is no law, regulation or policy that requires landlords to provide a 10-day notice to tenants regarding nonpayment or the intent to terminate a tenancy. The SAHA Administrative Plan requires owners to provide a tenant with a written notice specifying the grounds for termination.[9] This notice "must be given at or before commencement of the eviction action."[10] Regarding the timing of the notice, federal regulations require only that the notice be provided in compliance with state or local law.[11] The Texas Property Code, in turn, requires that landlords provide a 3-day notice to vacate prior to commencing an action for eviction in court.[12] The hardship policy thus requires tenants to provide a document they will never receive.

This problem cannot be solved simply by requiring submission of a 3-day notice rather than a 10-day notice. The hardship policy further states that the "[t]enant must promptly deliver the 10-day notice from the Landlord well in advance of a scheduled court date for eviction proceedings."[13] Due to the expedited nature of eviction proceedings,[14] there is often little time for a tenant to prepare for the hearing itself. In these situations, families are thinking about how to avoid homelessness, where they will move or who they can stay with, how they can reason with their landlord, how they can find legal help, what will happen to their children's enrollment in school, how they will juggle medical appointments, how they will explain to an employer their absence to attend court, and a litany of additional concerns. When the fast timeline of an eviction proceeding is imposed on a family that is already dealing with the stresses of everyday life compounded by poverty, it is flatly unreasonable to expect them to initiate this kind of application.

Moreover, the proposed hardship remedy in these eviction situations will not prevent eviction. The policy states that the remedy may include lowering the family contribution to 40% or 50% of monthly gross income for the remaining months of the current lease term. At the point that a tenant has missed a rent payment or other payment

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[8] San Antonio Housing Authority, Proposed 2019-2020 MTW Agency Plan, Sec. III Proposed MTW Activities 26 (February 15, 2019), available at https://saha.org/images/DRAFTMTW2020Plan2152019_Section3.pdf.
[9] San Antonio Housing Authority, Administrative Plan FY 2018-2019, Chapter 12.3.C(1) (2018)
[10] *Id.*
[11] 24 C.F.R. § 982.310 (2019).
[12] Tex. Prop. Code Ann. § 24.005 (West)
[13] San Antonio Housing Authority, Proposed 2019-2020 MTW Agency Plan, Sec. III Proposed MTW Activities 26 (February 15, 2019), available at https://saha.org/images/DRAFTMTW2020Plan2152019_Section3.pdf.
[14] See generally Tex. R. Civ. P. 510 (2019).

under the lease, however, the landlord is entitled to file a suit for eviction.[15] SAHA's Administrative Plan specifies that families may be evicted for "failure to pay rent or other amounts due under the lease."[16] Once the notice to vacate has been issued to the tenant, landlords are not required to provide the tenant an opportunity to pay prior to proceeding with the eviction. By definition, a tenant who is facing the threat of eviction who has been given a relevant notice by their landlord, will not be helped by the remedies proposed in this policy. The tenant will still be evicted. Furthermore, SAHA will most likely terminate the tenant's participation in the Section 8 Program as a result of the eviction.[17] As a result, this policy will do nothing to prevent displacement.

Whether the family is seeking a hardship waiver for the threat of eviction or for other circumstances, the remedies proposed in the SAFMR Hardship Policy are clearly inadequate. A family contribution set to 40% or 50% of monthly gross income is disturbing and unacceptable. At these levels, families will be spending an inordinate portion of their incomes on housing costs. Families will not have enough income left over after paying their rent to afford other basic necessities such as utilities, healthcare, childcare, education, transportation, and food. Family contributions set to 40% or 50% of monthly gross income will lead to evictions, terminations from the Section 8 Program, and homelessness. This will severely harm program participants and promote housing instability in San Antonio. The remedies should reduce household family contribution to 30% of monthly gross income in all situations.

Conclusion

Thank you for the opportunity to comment on this policy publicly. As community members who have been trusted to contribute to the ongoing discussion and implementation of the SAFMR policy through the MTW Alliance and SAFMR Committee, we sincerely urge SAHA to take note of our concerns and act to improve their proposed plan accordingly.

Sincerely,

Rich Acosta - President, My City is my Home
Amelia Adams - Fair Housing Researcher, Texas Housers
Matthew Garcia - Attorney at Law, Texas RioGrande Legal Aid
Sandra Tamez - Executive Director, Fair Housing Council of Greater San Antonio

[15] 24 C.F.R. § 982.310(a);
[16] San Antonio Housing Authority, Administrative Plan FY 2018-2019, Chapter 12.3.B(2)(b) (2018).
[17] Id. Ch. 12.1.D(2).

SAHA | SAN ANTONIO HOUSING AUTHORITY

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Public Comments

Summary of Public Comments to Draft MTW Plan

April 4, 2019

Sources

Source of Comment	**Number of commenters**	**Overview**
Resident and Landlord Meetings	Five commenters	Three supportive, one critical, one seeking additional information and making a recommendation
Email to mtw@saha.org	Five commenters	Four critical, one general request for assistance
SAFMR Committee Meeting (March 19)	Six commenters	Three recommendations regarding alternatives

Topics: ACOP and Admin Plan

Count	Topic	Detail
2	Infestations	Addressing insect infestations should be tenant's responsibility, not landlord's
2	Presentation quality	Informative and helpful presentation
1	Criminal history	Support proposed revisions
1	Fair Market Value	Question: can fair market value be determined and shared earlier (a year in advance)?
1	Infestations	Support proposed revisions
1	Move out inspections	Criticism that SAHA does not inspect units after tenant moves out
1	Property search	Recommend allowing for up to 30 days, instead of 15 days
1	Recertification process	Question: do new policies impact recertifications already in process?
1	Request for assistance	Would like to work with SAHA or a partner

Topics: SAFMR

Count	Topic	Detail
1	SAFMR: compliance	SAHA should be required to comply with its obligation to implement SAFMRs: proposal will not deconcentrate vouchers nor increase housing choices.
1	SAFMR: exception overlay	There must be an opportunity for voucher holders to live in the Central City: proposal does not provide enough subsidy to households looking to move into Central City.
1	SAFMR: funding	SAHA must find means of expanding housing choice other than participant attrition.
1	SAFMR: hardship policy	The proposed Hardship Policy is insufficient to aid those negatively impacted by the SAMFR Policy.
1	SAFMR: hold harmless	Recommend strengthening hold harmless to prevent new contracts (and drop in subsidy) when not intended.
1	SAFMR: hold harmless	Recommend expanding use of automatic subsidy adjustment outside exception overlay.

Topics: SAFMR Payment Standards

Count	Topic	Detail
2	SAFMR: payment standards	Recommend using 90-99% of HUD SAMFR option.
1	SAFMR: payment standards	Reduction in payment standards will limit voucher holders' choices, because apartment managers will decide to leave the program.
1	SAFMR: payment standards	Proposed payment standards are too low, based on analysis of MLS listings.
1	SAFMR: payment standards	Payment standards are not enough in expensive areas, and assistance is reduced in affordable areas.
1	SAFMR: payment standards	Higher payment standards are needed to overcome existing voucher segregation.
1	SAFMR: payment standards	The Success of SAHA's Mobility Pilot Program depends on adequate payment standards: SAHA must set the payment standard at the SAFMR levels as published by HUD.

STAFF RESPONSES TO PUBLIC COMMENT

Additional Talking Points

1. Clarification on the conditions that trigger a new contract
    a. What are triggers for new Housing Assistance Payment (HAP) contract?
        i. New move in
        ii. HQS Final Fail
    b. What actions on the part of tenant, landlord, and SAHA would trigger a new contract?
    c. Can we strengthen hold harmless by removing minor triggers?
    d. What can we propose to avoid unintended consequences?

Note that SAHA uses the following terms to refer to clients receiving housing assistance under a voucher program: tenant, program client, client, assisted family, family

1. **Please see the following reasons a new HAP Contract would be executed under the Housing Choice Voucher (HCV) Program.**
    a. New Unit: Any time SAHA approves the tenancy for a unit and the client moves into that unit [9.1.G HAP Contract Execution, SAHA Administrative Plan]. This happens if it is their first unit on the program or if they have moved. This includes if a client moves to a different unit in the same apartment complex.
    b. Housing Quality Standards (HQS) Final Fail: The unit final fails for items that the landlord/owner is responsible for; therefore the contract is terminated and the tenant moves to a new unit.
    c. Recertification ("Reexamination" in HUD materials): The tenant or landlord decide not to renew their lease. This is a voluntary move at recertification.
    d. Change in Utility/Appliance Responsibility: The landlord and client reach a mutual decision to change the responsibility of utility or appliance payments.
    e. Other Provisions of the Lease
2. **Actions the tenant may take that would trigger a new HAP Contract execution:**
    a. The tenant can request to move any time after the initial year of their lease or at recertification (non-renewal).
3. **Actions the landlord/owner may take, that would trigger a new HAP Contract execution:**
    a. If the landlord/owner does not make acceptable and timely repairs to failed HQS items, the unit will final fail and the tenant will be allowed to move.
    b. The landlord can elect not to renew the lease at recertification.
    c. The landland may make a change to the responsibility of utility payments. For example, if the landlord pays for utilities when the HAP Contract is initially executed, but decides that they need the tenant to assume responsibility for those payments, they can submit the requested change to SAHA and, if approved by SAHA, an updated HAP Contract will be executed.
4. **Is SAHA able to strengthen "hold harmless" by removing minor triggers?**
    a. Currently, all triggers for HAP Contract execution are driven by landlords and tenants.

   b. HUD requires that a new HAP Contract be executed for any approved change in utility payments. SAHA must apply for a waiver from HUD to amend the HAP Contract instead of executing a new contract.

5. **Keeping in mind that SAHA does not initiate HAP Contract executions, please note the following practices SAHA has put in place in an effort to avoid unnecessary moves/HAP Contract execution:**
   a. The HQS Commonly Failed Items Checklist; AHP-4432 is an informational sheet provided to landlords in the Moving Packet they receive at the time they submit the Request for Tenancy Approval (RTA). This sheet presents a detailed list of commonly failed HQS items, which is intended to help landlords identify items that could cause their unit to fail an inspection in order to repair those deficiencies before their scheduled SAHA inspection. This sheet is also available at any time on SAHA's website, www.saha.org.
   b. Through its MTW flexibility, SAHA currently utilizes a biennial/triennial recertification schedule, which allows some assisted families to be recertified either every two years, or every three years [11.1.C Scheduling Annual Reexaminations, SAHA Administrative Plan]. This schedule means that SAHA minimizes the requests to move, which would result in a new HAP Contract. The requirements for biennial/triennial recertifications are:
      i. Triennial: The household has at least one elderly disabled member and the household receives 100% of their income from fixed income sources.
      ii. Biennial: For any clients who do not meet the requirements of the triennial recertification.

Staff Responses to Public Comment

COMMENT 1:
SAHA should be required to comply with its obligation to implement SAFMRs. Payment standards are not enough in expensive areas, and assistance is reduced in affordable areas.

RESPONSE 1:
- SAHA is in the second year of implementing SAFMR. SAHA is not requesting any new waivers this year.
- Payment standards are shifting significantly, rising in forty-five zip codes, and falling in nineteen. Payment standards are set at a range of percentages of HUD SAFMR, with the most expensive zip codes receiving the highest subsidy in relation to HUD SAFMR (88-90% of HUD SAFMR).
- From the data we have today, we anticipate that this level of subsidy is sufficient to make progress toward the program's policy goals. However, the annual evaluation process will identify to what extent the current map achieves deconcentration and access goals.
- Of all the options discussed, this approach strikes a careful balance to increase the shift of subsidy while not losing the capacity to fund substantially the same number of households.
- Families living in areas with reduced subsidy are "held harmless" and will see no change to the value of their voucher as long as they stay in their contract.

COMMENT 2:

Higher Payment Standards are Needed to Overcome Existing Voucher Segregation. SAHA's proposal will continue to steer voucher holders into concentrated poverty in segregated neighborhoods.

RESPONSE 2:

- The annual evaluation process will quantify to what extent the submarket map deconcentrates vouchers. Areas that remain concentrated will be identified for special attention. In the coming months, one of the tasks of the SAFMR Committee will be to set deconcentration targets.

COMMENT 3:

With payments standards set as low as 81% of the Small Area Fair Market Rents (SAFMR) published by HUD, vouchers will not be sufficient to pay for rents in higher opportunity areas.

RESPONSE 3:

- No zip codes are proposed to be at 81% of HUD SAFMR, but two zip codes are set at 82%. Both of these zip codes will see a drop in subsidy, meaning they are "sending" neighborhoods and not "receiving" neighborhoods from the perspective of the SAFMR mechanism. As such, it is appropriate that the more expensive neighborhoods are set at 88%, 89%, and 90% of HUD SAFMR.

COMMENT 4:

Failing to acknowledge racial segregation prevents SAHA from developing policies that will meaningfully address residential segregation on the basis of race and other classes protected by the FHA.

RESPONSE 4:

- The MTW Plan explicitly states that one of the operating principles is to have no disparate impact on any protected class. Also, the SAFMR Committee has started investigating the feasibility of using tools that will help ensure that neighborhoods of opportunity are identified in ways that are sensitive to gender and race. One option, the online Opportunity Atlas, provides unprecedented earnings outcome data by race, by gender, and by income tier. The Seattle PHA is already using this tool to identify target areas for its moving to opportunity initiative, and it may be a good option for San Antonio as well.

COMMENT 5:

The Success of SAHA's Mobility Pilot Program Depends on Adequate Payment Standards.

RESPONSE 5:

- SAHA agrees, and is looking forward to working with the Fair Housing Council to identify the specific neighborhoods that provide the best combination of amenities for households participating in a mobility counseling program. SAHA proposes to follow the lead of other mobility counseling programs who have allocated additional subsidy (above and beyond the SAFMR payment standards) to ensure that households are able to afford a successful move to a new neighborhood. Not all voucher holders who move will require or be willing to participate in a specific mobility counseling program.

COMMENT 6:
There Must Be an Opportunity for Voucher Holders to Live in the Central City. While the "Exception Overlay" does allow for households already residing in these rapidly changing areas to petition for continued assistance, it does not allow for new households to move into these areas with increased payment standards.

RESPONSE 6:

- The policy does prioritize existing residents over new residents in the exception overlay areas. This is because the specific rationale for developing the Exception Overlay was to protect residents from being displaced in areas where there was a mismatch between HUD SAFMR and local data.
- The Exception Overlay is a temporary bridge to address the delay built in to HUD's calculations. As HUD data catches up to market conditions, payment standards will increase and the Exception Overlay will disappear. This has already happened in 78215 (Broadway Corridor), which was in the Exception Overlay in Phase 1, but removed in Phase 2 because HUD SAFMR data has now "caught up", and the expected increase in payment standard is significant: above $300 on average. Starting next year, both existing residents in the 78215, zip code area, and those seeking to move there, will benefit from increased subsidy.
- An additional complication in this part of town is existing concentrations of vouchers in the Exception Overlay. Of the five zip codes in the Exception Overlay, four currently have higher than average concentrations of vouchers. One, 78208 (Government Hill), has over twice the average concentration (12% vs 5%). Under the general SAFMR approach, this level of concentration would be considered negative, the explicit goal of SAFMR is to deconcentrate vouchers. Even after accepting that these areas are changing, and that there is value in protecting existing residents from being displaced, it does not automatically follow that the area should be considered a destination for new voucher holders. The SAFMR Committee has not yet identified the conditions under which it is appropriate to encourage increased concentrations of vouchers. Fortunately, this discussion is scheduled to occur in the coming months. This recommendation must be developed carefully, taking into account the full range of policy factors.

COMMENT 7:
SAHA must find means of expanding housing choice other than participant attrition.

RESPONSE 7:

- The Phase 2 proposal seeks to maintain a balance within the Housing Choice Voucher Program budget, in order to minimize impact on any other program. The annual budget process allocates MTW funding to a variety of uses, including self-sufficiency initiatives, capital projects, development projects, and other initiatives that expand affordable housing in San Antonio.

COMMENT 8:
The proposed Hardship Policy is insufficient to aid those negatively impacted by the SAMFR Policy.

RESPONSE 8:
- Staff has drafted an alternative proposal that would address this comment. The new proposed process would automatically provide additional subsidy to a household in the Exception Overlay based on family size, income, and rent burden.