PLANNING CONTEXT

LONG TERM PLANS

● Strategic Plan Outcomes

Annual Implementation Plans

● MTW Plan - MTW waivers
● ACOP - Public Housing Program
● Admin Plan - Assisted Housing Programs
● FSS Action Plan - Family Self-Sufficiency Program

5-YR Implementation Plans

● Asset Management Plan
● Capital Fund Program Plan
The Moving to Work Designation allows the organization to work differently than other PHAs by allowing SAHA to waive some regulatory waivers and combine funding for approved non-traditional uses.
MTW STATUTORY OBJECTIVES

All regulatory waivers and non-traditional uses of funds are leveraged to further at least one of the statutory objectives.

Cost Efficiency/Effectiveness
Reduce cost and achieve greater cost effectiveness in Federal expenditures.

Housing Choice
Increase housing choices for low income families.

Self-Sufficiency
Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
ANNUAL SUBMISSION OF AGENCY PLANS TO HUD

- Moving to Work (MTW) Plan
- Assisted Housing Programs Administrative Plan
- Public Housing Admissions and Continued Occupancy Policy (ACOP)
- Capital Fund Program (CFP) Plan
- Family Self-Sufficiency (FSS) Program Action Plan

PUBLIC COMMENT PERIOD

- February 14 – March 15, 2022
- Email comments to: mtw@saha.org
- Mail comments to:
  ATTN: Policy & Planning
  818 S. Flores St. | San Antonio, TX 78204
- Submit comments online: saha.org/public-notices
The MTW Plan is required to follow a public comment process and outlined below.

- **February:** Draft MTW Plan posted for 30-day public comment period
- **March:** Public Hearing scheduled during Operations and Choice Neighborhood Committee Meeting
- **April:** Consideration and appropriate action by Board of Commissioners and submission to HUD
- **May-June:** Address HUD questions
- **July 1:** Initiate implementation of the MTW Plan
FY22-23 PROPOSED MTW ACTIVITIES

FY2019-2: Alternate Recertification Process (PH and HCV) [CHANGE]

- Establishes triennial recertifications for all PH and HCV households
- For HCV households, payment standards will be applied to current families between recertifications
- Currently, only households on fixed incomes are on the three-year schedule; every other household is on a biennial or two-year schedule
- Details about how this will be implemented are covered under the ACOP and Admin Plan proposed changes

FY2023-1: Property-based local, non-traditional rental subsidy program [NEW]

- Establish an MTW rental subsidy program that is run like public housing to support new developments with more affordable rents
- Income-based rents + tenant protections + more equitable screening practices
Proposed Housing Preservation Plans

- Public Housing: Over next 5 years, plan to invest over $23 million in capital repairs to extend the useful life at 37 properties and approximately 3,247 housing units.
- Beacon Communities: Plans to invest over $22 million in capital repairs to extend the useful life at 28 properties and approximately 4,096 units.

Proposed Housing Expansion Plans

- New Construction: Agency has 4,103 units in the construction pipeline.
- Other projects in the early planning and pre-development phase could add nearly 1,292 units in the coming five years.
2022–2023 FSS ACTION PLAN
Proposed changes that apply to the FSS Action Plan

1. Defining FSS Program Withdraw
This section adds language to specify when a family is considered withdrawn from the FSS Program. Today, general practice is to wait three months for a response before terminating.

5.2.F. TERMINATION OF THE CONTRACT
- (A) A family submits a written request to withdraw; or
- (B) A family fails to respond within 10 business days upon receipt of a certified letter from SAHA requesting the family contact FSS staff.

- An FSS participant will be considered inactive if they do not respond to multiple outreach attempts (texts, phone calls, emails) by FSS staff within 30 days and then a certified letter will be sent out providing 10 additional business days to respond to FSS staff. Exceptions will be made for extenuating circumstances such as an inability to pay phone or internet bills which may have lead to a delay in response.
2022–2023 ACOP & ADMIN PLAN
The proposed revisions are aimed at accomplishing the following objectives:

- Accurately reflect federal regulations, state regulations and local law
- Improve problematic policies
- Eliminate redundancies and contradictions
- Reduce unnecessary resource expenditures
- Accommodate the needs of clients and landlords
OVERVIEW

HUD REGULATIONS
Code of Federal Regulations
■ General program regulations
HUD Public and Indian Housing (PIH) Notices
■ Regulatory clarification, guidance and recommendations
■ New/updated regulations

SAHA POLICY
SAHA Administrative Plan
■ The manner in which SAHA will administer the HCV program
■ Must comply with HUD regulations

HUD-defined program rules that SAHA must follow
Generally, two types:
MANDATORY
■ “The PHA must…”
■ “The PHA must not…”
■ “The PHA may not…”
DISCRETIONARY
■ “The PHA may…”
Vague, must be defined

SAHA-defined program rules that SAHA must follow
■ Must comply with HUD regulations
■ Must be clearly defined
■ Must be unambiguous

1) SAHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program.

(a) Families may be briefed individually or in groups.

(i) Briefings will be conducted in individual or group meetings.

(ii) Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, SAHA may approve another adult family member to attend the briefing.

(iii) Families that attend group briefings and still need individual assistance will be referred to an appropriate SAHA staff person.
Policy revisions are indicated by **red text**.

- **Strikethrough** = omitted text
- **Underline** = added text
2022–2023 ACOP & ADMIN PLAN
Proposed changes that apply to the ACOP and ADMIN PLAN

1. **3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY**
   Updates have been made to SAHA’s Criminal History Screening Criteria Grid in an effort to establish more equitable admissions standards for **applicant families**.

   SAHA clarified the distinction between misdemeanor and felony offenses for violent criminal activity and drug-related criminal activity. Felony offenses will carry a longer lookback period than for misdemeanor offenses. Additionally, SAHA removed minor infractions from the grid, including denying for a pattern of miscellaneous misdemeanor offenses, and single convictions for DUI and misdemeanor drug possession charges.
### FY 2022–23 ACOP Revisions

#### 3.3 DENIAL OF ADMISSION

##### 3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY

<table>
<thead>
<tr>
<th>Offense Category</th>
<th>Within seven (7) years of offense</th>
<th>Within five (5) years of offense</th>
<th>Within three (3) years of offense</th>
</tr>
</thead>
<tbody>
<tr>
<td>Violent Criminal Activity</td>
<td>• 1st Degree / 2nd Degree Homicide&lt;br&gt;• Manslaughter / Criminal Negligent Homicide&lt;br&gt;• Assault / Battery (Felony)&lt;br&gt;• Aggravated Assault&lt;br&gt;• Robbery (All Types), Including Aggravated Robbery&lt;br&gt;• 1st Degree Felony Injury to a Child, Elderly or Disabled Individual&lt;br&gt;• Sexual Assault / Sex Offenses&lt;br&gt;• Deadly Conduct (Felony)&lt;br&gt;• Weapons Offense (Against Person)&lt;br&gt;• Kidnapping, Abduction, and Unlawful Restraint&lt;br&gt;• Family Violence/Domestic Violence</td>
<td>• Assault (Misdemeanor)&lt;br&gt;• Deadly Conduct (Misdemeanor)&lt;br&gt;• Stalking&lt;br&gt;• Harassment&lt;br&gt;• Crimes Involving Terrorism / Terroristic Threat</td>
<td>• Assault by Contact&lt;br&gt;• Crimes against Animals</td>
</tr>
</tbody>
</table>
## FY 2022–23 ACOP REVISIONS

### SAHA CRIMINAL HISTORY SCREENING POLICY CONT’D

<table>
<thead>
<tr>
<th>Offense Category</th>
<th>Within seven (7) years of offense</th>
<th>Within five (5) years of offense</th>
<th>Within three (3) years of offense</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drug-Related Criminal Activity</td>
<td>• Drug Offense (Manufacture, Distribution, or Possession with Intent to Distribute)</td>
<td>• Driving under the Influence - If two (2) or more convictions • Drug Offense (Possession) (If two or more felony convictions)</td>
<td>• Driving under the Influence / Driving while Intoxicated - or other Alcohol-Related Conviction (If two or more convictions) • Drug Offense (Possession) - Misdemeanor / Felony • Drug Offense (Possession) - Misdemeanor / Felony within the past six months** Currently using Drugs / History of</td>
</tr>
</tbody>
</table>
### FY 2022–23 ACOP REVISIONS

**SAHA CRIMINAL HISTORY SCREENING POLICY CONT’D**

<table>
<thead>
<tr>
<th>Offense Category</th>
<th>Within seven (7) years of offense</th>
<th>Within five (5) years of offense</th>
<th>Within three (3) years of offense</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other*</td>
<td>Abandoning or Endangering Child</td>
<td>Fraud</td>
<td>Trespassing</td>
</tr>
<tr>
<td></td>
<td>Arson-related</td>
<td>Burglary/Breaking and Entering (Felony Only)</td>
<td>Theft/Stolen Property (If 2 felony convictions or more)</td>
</tr>
<tr>
<td></td>
<td>Human Trafficking / Human Smuggling</td>
<td>Criminal Mischief / Damage / Property Vandalism (Felony Only)</td>
<td>Weapons-related (other than use of weapons against person) Unlawful Carrying of a Weapon</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (If two or more convictions)</td>
<td>Prostitution (Felony Only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Solicitation</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Destruction of Property</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)</td>
</tr>
</tbody>
</table>

*Other is defined as the following:

- Criminal Activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity (within a three-block radius), and
- Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of SAHA (including a SAHA employee or a SAHA contractor, subcontractor, or agent).
Proposed changes that apply to the ACOP and ADMIN PLAN (continued)

2. **Triennial Recertifications for all Assisted Families**
   *All current residents* are being moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently. This change is in Admin Plan 11.1.C and ACOP 9.1.C.
2022–2023 ACOP ONLY
Proposed changes that apply to the ACOP only

1. **5.1.B DETERMINING UNIT SIZE:** This section was changed in order to align with the existing policy in the Housing Choice Voucher Program and may impact applicant families.

   Changes include assigning bedrooms for foster children only if they will be in the unit for more than 6 months.

   Changes also clarify that all children anticipated to reside in the dwelling will be included in determining unit size upon submission of supporting documentation.
Proposed changes that apply to the ACOP only (continued)

2. **8.1.E SECURITY DEPOSITS**
   This section was changed to provide former residents with notice of any charges within 30 days from the date of move out in order to align with Texas Property Code. Current SAHA policy allows only 10 business days.
Proposed changes that apply to the ACOP only (continued)

4. **12.2.B OCCUPANCY STANDARDS TRANSFERS:**
   Language was changed to allow for flexibility when processing transfer requests based on the circumstances of the family and unit availability. **Current residents** will no longer be required to transfer based on occupancy standards unless SAHA determines the transfer to be necessary (i.e. health or safety reasons).
Proposed changes that apply to the ACOP only (continued)

3. **9.3.C CHANGES AFFECTING INCOME OR EXPENSES**
   Language was added to clarify that all increases in income, regardless of amounts, must be processed for Jobs Plus Participants at Lincoln Heights participating in Jobs Plus Earned Income Disregard (JPEID).
2022–2023 PH LEASE
Proposed changes that apply to the Public Housing Lease

1. **Addressing SAHA’s policy on garage/yard sales**

   **IX. Tenant Obligations (cc)**
   
   SAHA is proposing to update language to reflect current policy on garage/yard sales. Garage/yard sales may be allowed only when sponsored by property management.
Proposed changes that apply to the Public Housing Lease

2. Restricting the display or use of legal firearms on SAHA property.

IX. Tenant Obligations (p)

Language was changed to prohibit the display or use of legal firearms on SAHA property.
Proposed changes that apply to the Public Housing Lease

3. Addition of informal conference option

Attachment A: San Antonio Housing Authority Public Housing Grievance Procedure

SAHA has added a section detailing that residents may settle grievances through an informal conference at their community office rather than scheduling an informal hearing, when applicable.

Language was changed in subsection III to reflect that the request for an informal hearing may be made by a resident in the event they are dissatisfied with the informal conference decision.

Section IV language regarding “housing assistance termination” is replaced by “adverse action.” Language was added to subsection VII that supports the final decision of the informal hearing and specifies the timeframe for appeal.
Proposed changes that apply to the Public Housing Lease

3. **Updated pet deposit amount**

*Attachment B: Pet Ownership Policy*

SAHA is proposing language changes to update the pet deposit amount to $150.00 instead of $200. Changes also reflect that, if a repayment agreement is needed, the down payment will be $50.00 with two (2) $50.00 monthly payments thereafter, for a total of $150.

SAHA is also proposing to update the unauthorized pet fee to the same updated pet deposit and repayment amount of $150.00.
2022–2023 ADMIN PLAN ONLY
Proposed changes that apply to the ADMIN PLAN only

1. Application of Payment Standards Between Recertifications
   6.3.C APPLYING PAYMENT STANDARDS [24 CFR 982.505; 982.506(B)]
   Language was added to allow the application of increased payment standards for current families in between recertifications with approved requests for rental increase.
6.3.C APPLYING PAYMENT STANDARDS

(d) Increases

(iii) For MTW participants, SAHA will apply the increased payment standard during processing of any approved requests for rental increases in between triennial recertifications.
2. Photos and Digital Scans of Original Verification Documents

**7.1.B OVERVIEW OF VERIFICATION REQUIREMENTS**

In order to move SAHA toward being a more digitally literate agency, particularly in the era of COVID-19, language was added to specify that the agency will accept clear and legible photos or digital scans of original documents.
7.1.B OVERVIEW OF VERIFICATION REQUIREMENTS

(2) Requirements for Acceptable Documents

(b) SAHA may accept clear and legible photos or digital scans of original documents.

(i) SAHA may at any time request the original document for verification.
Proposed changes that apply to the ADMIN PLAN only (continued)

3. Removing Landlord Self Certification for Inspections

8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT
SAHA will no longer permit landlords to self certify Housing Quality Standards (HQS) inspections. This will affect current landlords and HCV families as they must allow for SAHA Inspections to conduct a follow up inspection instead of the previous process in which SAHA would accept a statement of repair certified by the landlord and tenant (with their signatures).

The current self-certification policy creates undue administrative procedure / burden and adds time to the inspections process, which leads to landlord and resident complaints. Additionally, the resident is not always knowledgeable if the items were correctly repaired, and sometimes self-certifications are signed without repairs being satisfactorily completed.
8.2.F **INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT**

(3) **Self-certification of Corrective Action**

(a) In lieu of conducting a physical reinspection to verify corrections of five (5) or fewer HQS owner deficiencies that are not considered life-threatening (see 8.1.C), SAHA will require a self-certification of repairs signed by the landlord and tenant.

(b) If SAHA does not receive the self-certification of repairs within the specified time frame, SAHA will schedule a physical reinspection within seven (7) calendar days of the self-certification deadline.
8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Self-certification of Corrective Action

(c) All self-certifications are subject to a quality control inspection. If the quality control inspection determines that repairs were not completed as certified by the landlord and tenant:

(i) SAHA will refuse to accept self-certifications from the landlord for 18 months from the date of the Quality Control Inspection;

(ii) The unit will Final Fail; and

(iii) The unit will be abated effective the first day of the month following the date on which the self-certification was submitted.

(d) Self-certifications will not be accepted for any infestations, including but not limited to roaches, mice, rats, bed bugs or other insects.
8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

(4) Reinspections

(d) If at the end of a corrective period or any SAHA-approved extension, a reinspection finds two or fewer HQS owner deficiencies were not corrected, the landlord and tenant may submit a self-certification that the remaining failed items were completed to avoid the abatement of the HAP contract.

(i) The self-certification form must be submitted to the inspections office no later than seven (7) calendar days from the reinspection date.

(ii) If the form is not received within seven (7) calendar days, the unit will be abated the first day of the month following the date on which the inspection final failed.
Proposed changes that apply to the ADMIN PLAN only (continued)

4. Addressing MOD Rehab Program in Emergency Transfer Plan

EXHIBIT 16-2: SAHA EMERGENCY TRANSFER PLAN

Language was added to address emergency transfer procedures in the MOD Rehab Program.
EXHIBIT 16-2: SAHA EMERGENCY TRANSFER PLAN

(5) **Section 8 Moderate Rehabilitation (Mod Rehab) Program**

According to PIH Notice 2017-08, the VAWA rules regarding Emergency Transfer Plans apply to Mod Rehab as a “Covered Housing Program” (24 CFR 5.2003).

(a) If the case falls under VAWA definitions, SAHA will offer the family a tenant-based voucher and follow the expedited move process detailed above for the Housing Choice Voucher Program.

(b) For families who request to move sooner than when a tenant-based voucher will be available, SAHA will offer the participant a transfer to an available Mod Rehab unit or Project-Based Voucher unit provided the participant meets any tenant screening or eligibility requirements of the property.

(i) Participants will not be denied admission on the basis or as a direct result that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.
Proposed changes that apply to the ADMIN PLAN only (continued)

5. **Adjusting Program Parameters for Move On Program [MTW Activity]**

19.4 **MOVE ON PROGRAM**

Language was added to clarify that "other supportive housing" is included in the flexibility inherited with the MTW waiver. The reference to MTW Activity FY 2019-2020 was also added since this is when the Move On Program was first created as an amendment to the original 2011 MTW Activity.
19.4 MOVE ON PROGRAM

19.4.A OVERVIEW

(1) The Move On Program provides 40 tenant-based vouchers for families currently residing in Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), or other supportive housing to transition to subsidized housing via the housing choice voucher. The program is designed to serve those who previously experienced chronic homelessness, have been successfully served through PSH supportive housing and will benefit from on-going housing subsidy to prevent a return to homelessness. Current partner is the South Alamo Regional Alliance for the Homeless (SARAH) [see MTW Activity FY 2011-9 and MTW Activity FY 2019-2020 Amendment].
**NEXT STEPS**

**FEBRUARY**
- February 14: Comment period begins

**MARCH**
- Capture public comment
- March 15: Comment period ends
- March 16: Public hearing

**APRIL**
- April 6: Board consideration of MTW Plan
- April 15: Submit MTW Plan to HUD

**MAY - JUNE**
- Work with MTW-HUD Office to address any issues

**JULY**
- Implementation of MTW Plan

**Comment Period: February 14 – March 15**
Comments are due March 15, 2021 and may be emailed to mtw@saha.org, submitted through the online form, or physically delivered to: Policy & Planning Department, 818 S. Flores St., San Antonio, TX 78204. All documents can be found at saha.org/public-notices.
MTW PLAN & PUBLIC HOUSING LEASE UPDATES

March 16 | 12:30 PM

The Agency will hold a public hearing on the draft FY2023 Moving-to-Work (MTW) Plan. The Annual MTW Plan describes the Agency’s planned use of its MTW flexibilities, including MTW waiver requests and other required MTW information that will support the Agency’s annual strategic implementation plan.

PUBLIC COMMENT SIGN-UP FORM

PUBLIC COMMENT ON FY2023 MTW PLAN & PUBLIC HOUSING LEASE UPDATES

Feb. 14 – March 15

The Agency is hosting a 30-day public comment period from Monday, Feb. 14, 2022, through 5 p.m. on Tuesday, March 15, 2022.

Comments on the FY 2023 MTW Plan and Public Housing Lease Updates are due March 15, 2022, and may be emailed to mtw@saha.org, submitted through this online form (in español), or physically delivered to:

Policy & Planning Department
816 S. Flores St. | San Antonio, TX 78204

@HousingSAT

HUD Information Reporting Requirements (FY2023 MTW PLAN)
The Agency’s Annual MTW Plan as required by HUD Form 50390:
Elements of Annual MTW Plan.

PLAN

Appendix C: Proposed Housing Program Implementation Policy Changes
Appendix C contains proposed changes to the Agency’s implementation policies for the Public Housing Program and Assisted Housing Programs.

Public Housing – FY2022-2023 Admissions & Continued Occupancy Policy
Revision Summary »

Housing Choice Voucher (Section 8) – FY2022-2023 Administrative Plan
Revision Summary »

Revision Summary »

VIEW PROPOSED PH LEASE CHANGES:
Revision Summary »

PUBLIC HEARING NOTICE
QUESTIONS + FEEDBACK

EMAIL
mtw@saha.org

MAIL
ATTN: Policy & Planning
San Antonio Housing Authority
818 S. Flores St. | San Antonio, TX 78204