

ANNUAL MTW PLAN

Fiscal Year 2022-2023

In FY2020, SAHA developed the one-year MTW Plan as an integral component of a five-year rolling Strategic Plan. The new format was the result of a deliberate effort to more closely align the agency's various planning efforts. Previously, the Agency anticipated completing a full update to the strategic plan document every year with the annual MTW Plan documented as Appendices A through E, comprising the entirety of the 50900 requirements.

For purposes of ensuring continued program administration under the Moving to Work demonstration and facilitating realistic planning timelines, the Agency has shifted back to submitting the Annual MTW Plan to HUD, without the full five-year strategic plan update.

Document submission date:

MTW Plan DRAFT Released For Public Comment: February 14, 2022

MTW Plan DRAFT Submitted to HUD for review: April 15, 2022

Final MTW Plan Submitted to HUD for approval: July 13, 2022

Final MTW Plan Approved by HUD: August 11, 2022



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Section I. Introduction

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

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

SAHA 2025 SUMMARY

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

GUIDING PRINCIPLES AND STATEMENTS

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

LONG-TERM OUTCOMES

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

- Two Staff-focused outcomes
 - SAHA staff respect and value diversity and inclusion
 - SAHA staff thrive in career and professional work
- Four Client-focused outcomes
 - SAHA residents have a sufficient supply of affordable housing options
 - SAHA residents live in quality housing
 - SAHA residents feel safe
 - SAHA residents have access to affordable utilities

PROCESS

The Agency's Strategic Planning update process systematically assesses the following plan elements on an ongoing basis:

1. Theory of Change
2. Guiding Statements (Vision, Mission, Impact)
3. Navigation: Outcomes, Indicators, Targets, Strategies



4. Impact: Neighborhood, Local Economy, Social
5. Performance Monitoring: Operational, Financial, Resident



Section II. General Housing Authority Operating Information

A. Housing Stock Information

At the beginning of FY2022, the agency had a total of 6,030 units in inventory and is expected to close the FY2022 fiscal year with 6,070 units. The Agency plans to remove 25 units during the FY2023 Plan Year -- bringing the projected inventory as of June 30, 2023 to 6,045. Below is the list of changes.

Public Housing Stock Changes at a Glance

Period	Count	Change Description
Actual: June 30, 2021	6,030	Actual inventory at the end of FY2021 and start of FY2022
Projected: June 30, 2022	6,070 (6,030 +40)	The agency anticipates adding 40 units at the Lofts at Alazan during FY2022.
Projected: June 30, 2023	6,045 (6,070 -25)	The agency plans to remove 25 units from Springview Building B and C. See below for more details.

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

i. Planned New Public Housing Units

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

ASSET MANAGEMENT PROJECT (AMP) FILL IN NAME AND NUMBER	0/1 Bdm	2 Bdm	3 Bdm	4 Bdm	5 Bdm	6+ Bdm	Total Units	Population Type	Section 504 Accessible Units* (Mobility)	Section 504 Units* (Hearing/ Vision)
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Total Public Housing Units to be Added in the Plan Year:

0

* The federal accessibility standard under HUD's Section 504 regulation is the Uniform Federal Accessibility Standards (UFAS) for purposes of Section 504 compliance (24 CFR 8.32). HUD recipients may alternatively use the 2010 ADA Standards for Accessible Design under Title II of the ADA, except for certain specific identified provisions, as detailed in HUD's Notice on "Instructions for use of alternative accessibility standard," published in the Federal Register on May 23, 2014 ("Deeming Notice") for purposes of Section 504 compliance, <https://www.govinfo.gov/content/pkg/FR-2014-05-23/pdf/2014-11844.pdf>

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

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



ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Springview TX006000031 Building B, C, and adjacent vacant land, Convent, Miller School building and Annex building	25 18 (Bldg B) 7 (Bldg C)	SAHA will be obtaining HUD approval to dispose of real estate and existing PH units for a planned new development called the Artisan at Springview.
Victoria Plaza/OP Schnabel TX006000008 Victoria Commons, YMCA building located at 440 Labor Street, San Antonio, Texas 78210	0	SAHA will be obtaining HUD approval to dispose of real estate, there are no existing PH units. The units that will be created will be for sale market rate townhomes. The revenue received from the sales will go towards future affordable housing.
Victoria Plaza/OP Schnabel TX006000008 Victoria Commons Administration Building located at 400 Labor Street, San Antonio, Texas 78210	0	SAHA will be obtaining HUD approval to dispose of real estate, there are no existing PH units. The building may be swapped with the City of San Antonio for another parcel of vacant land that can be utilized to create affordable housing or developed into mixed-use that consists of affordable housing and leased space.
TOTAL: Public Housing Units to be removed in the Plan Year	25	

iii. Planned New Project Based Vouchers (PBV)

SAHA currently does not have any plans to project-base and new vouchers. If additional opportunities to project base housing choice vouchers at additional properties arise during FY2023, 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 (AHAP) 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
NA	NA	NA	NA
TOTAL: Planned new	0		



Project Based
units in Plan Year

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. Select one of the of the following to indicate the **Planned Status by the end of the Plan Year: "Committed," "Leased," or "Issued." In column three, indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Gardens at San Juan	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	Leased / Issued	No	Final phase of Choice Neighborhood
Woodhill	35	Leased / Issued	No	Beacon Community - 10 support Next Step Housing Program (FY21-1 Activity) & 25 support VASH PBVs (Note: VASH PBVs are not funded through MTW and are only subject to specific MTW policies per HUD approval)
Rosemont at Highland Park	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)
Total: Planned Existing Project-Based Vouchers	180			

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
<p>Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. As of the drafting of the MTW Plan, It is anticipated that the property will begin re-occupancy in March 2022 and be fully occupied by September of 2022.</p> <p>Local, non-traditional units - the Agency has several new developments under construction that will increase the Agency's LNT portfolio. In addition, the Agency is pursuing other new construction developments and preservation of non section 8/9 affordable units in its Beacon portfolio that may include MTW investment SAHA will report on any actions taken in a subsequent MTW Report. The Agency's preservation and expansion activities are also under Section 4, Activity FY2011-1e and listed in Appendix E, Asset Management Plan.</p>

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.

APPENDIX A: HUD Information Reporting Requirements | Section 2. Operating Information



MOVING TO WORK PLAN
FY 2022-2023

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 plan will address Life-Safety repairs, comprehensive modernization and substantial renovations at several public housing developments. Other capital projects may be added based upon capital planning efforts in addition to the results of the physical needs assessment study which should be completed in 2022.

Planned Capital Improvements

Property	Budget	Description
Apache	27,500	Redevelopment / Foundation
Blanco	78,000	Generator Modernization
Cheryl West	684,000	Roof Replacement
College Park	300,000	Elevator Design and Replacement
Cross Creek	310,000	Parking Lot Survey / Repairs
Christ the King	147,000	Elevator Design and Replacement
Escondida	126,000	Elevator Design and Replacement
Frank Hornsby	260,000	Elevator Design and Replacement
Kenwood North	72,000	Cylinder Replacement
Lewis Chatham	25,000	Generator System Design
Lincoln Heights	65,000	Security Cameras
Lincoln Heights	4,500	Architectural Barrier
Lincoln Heights	3,209,735	Lead Based Paint Project
Mission Park	951,050	Lead Based Paint Project
Park Square	20,000	Roof Replacement
Pin Oak I	127,000	Elevator Design and Replacement
Riverside	700,270	Lead Based Paint Project
San Pedro Arms	145,000	Elevator Design and Replacement
San Pedro Arms	57,000	Generator Modernization
Victoria Plaza	57,000	Security Entry Access, Camera, Alarm
W.C. White	25,000	Generator System Design
William Sinkin	25,000	Foundation Repairs
Cassiano	200,000	Foundation Repairs
Highview	161,200	Storm Drainage
Mirasol Homes	1,209,800	Roof Repairs/Replacement
South San Apts.	161,200	Drainage Repairs



Villa Tranchese	1,750,000	Exterior Balcony Repairs
Villa Veramendi	950,000	Roof Repairs/Replacement
(1) Partial expenditures may carry over from FY20 to FY21.		

B. Leasing Information

i. Planned Number of Households Served

As detailed in the table below, SAHA plans to serve at least **18,572 MTW households** in fiscal year 2022-23, through both public housing, MTW Housing Choice Vouchers, and other families served as part of activity FY2011-1e. SAHA's HCV MTW baseline is 12,351 vouchers and 148,212 unit months (12,351 multiplied by 12 months). SAHA's PH program has 6,070 projected units and 71,388 unit months available for leasing. SAHA's PH occupancy goal is 98%; therefore, the Agency plans to serve 5,949 households (6070 multiplied by 98%) or 71,388 unit months leased. SAHA's LNT activities served 272 other families in FY2021. This is used as a minimum benchmark for FY2023.

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	71,388	5,949
MTW Housing Choice Vouchers (HCV) Utilized	148,212	12,351
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	3,264	272
Local, Non-Traditional: Homeownership^	N/A	N/A
Planned Total Households Served:	222,864	18,572

* "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	3,264	272
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 will begin implementing a revamped eligibility process. This should help streamline the eligible applicant pool and centralized housing offers. Additionally, transfer policies related to newly developed properties will be revised.
MTW Housing Choice Voucher	The Agency continues to select applicants from the waitlist to ensure MTW baseline is met. In addition, the Agency implemented a pre-eligibility process to increase the voucher utilization success rate. The Agency is also experiencing other issues including: increase in ownership changes and influx of new landlords, low staffing levels, and other rental market changes.
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	4,939	Closed	Yes
La Posada Mod Rehab	Site-Based	29,704	Open	n/a
Prospect Hill Mod Rehab	Site-Based	1,076	Open	n/a
Serrento Mod Rehab	Site-Based	21,842	Open	n/a
Public Housing	Site-Based	52,301	Open	n/a
East Meadows Project Based Vouchers	Project Based Voucher Site Based	17,796	Open	n/a
Gardens at San Juan Project Based Vouchers	Project Based Voucher Site-Based	38,345	Open	n/a
Wheatley Park Senior Project Based Vouchers	Project Based Voucher Site-Based	578	Open	n/a
PBV Preferred Beacon	Project Based Voucher Site-Based, Referral-based	0	Open (Referrals Only)	n/a



Please describe any duplication of applicants across waiting lists:

The total unique number of waitlist applicants across all waitlists is 81,879. There are currently: 4,946 S8 waitlist applicants, 52,834 for MOD/PBV, and 53,125 in PH.

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Section 8 Tenant Voucher	HCV WL was reopened from Sept 1 -17, 2021 and was lottery based. After closing, 5,000 applicants were randomly selected and placed on WL. Total number of applicants was 12,756.
La Posada Mod Rehab	None
Prospect Hill Mod Rehab	None
Serrento Mod Rehab	None
Public Housing	All 70 PH waitlists were closed early FY22 and replaced with 3 new PH waitlists, which went live on January 14, 2022. Depending on the information applicants enter, they will be matched to at least 1 of these properties or possibly all three. The 3 PH lists are: 1. Family Public Housing 2. Elderly/Disabled Housing 3. Accessible Housing
East Meadows Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Gardens at San Juan Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
Wheatley Park Senior Project Based Vouchers	The Agency is planning to transition away from site-based PBV waitlists.
PBV Preferred Beacon	The Agency is planning to transition away from site-based PBV waitlists.



Section III. Proposed MTW Activities

The Agency is seeking approval for proposed changes to an existing activity and one new MTW activity.

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

The Agency is proposing two changes to the existing activity: (1) change to the alternate schedule for the housing choice voucher programs and public housing program and (2) adding alternate payment standard increase procedures.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

This activity has four main components that are designed to streamline and simplify the recertification process: (1) alternate schedule, (2) alternate public housing review procedures, (3) alternate income verification methods, and (4) alternate payment standard increase procedures. 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 activity established biennial and triennial schedules for recertifications for the low income public housing and housing choice voucher programs. The Agency has been using alternative schedules since 2011.

The Agency is proposing to establish a modified schedule that would move biennial recertifications to a three-year cycle (triennial).

If approved, this change would move approximately half of voucher and public housing households from biennials to triennials. Every household will have the option of interim recertification 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.

(2) Alternate PH Review Procedures (PH only)

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

As residents move to biennial and triennial recertification schedules, it becomes more efficient to coordinate notification and update requirements in accordance with their new recertification



schedules. Therefore, SAHA proposes to conduct review procedures related to flat rent notice and family composition updates for PH individuals at the time of reexamination.

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

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

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

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

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

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

(4) Implementation of Payment Standard Increases at Request for Rental Increase (HCV)

Typically, when the payment standard amount is increased, the increased payment standard is applied at the family's next regular reexamination. In order to reduce tenant rent burden due to approved rental increases during interim recertification years, SAHA is proposing to apply the increased payment standards at each approved request for rental increase.

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 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.



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

The Agency anticipates implementing the proposed changes as follows:

- The Agency will implement triennial recertifications through a phased approach by updating the recertification schedule for biennial recertification households at the next scheduled recertification.

Because the MTW approval process may extend beyond the anticipated schedule, the Agency will have to evaluate monthly recertification volumes to ensure processing capacity. In the event the total number of recertifications scheduled for any given month exceeds staffing capacity, the Agency may push a random selection of recerts to a later period. The Agency will also need to consider pre-processing timelines which include mailing out recertifications three months prior to the effective certification date.

B. ACTIVITY METRICS INFORMATION

HUD Standard Metrics

CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmarks
Total cost of task in dollars (decrease).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Definition: Cost of staff time	HCV: \$479,520 PH: \$221,778 Total: \$701,298	HCV: \$159,840 PH: \$73,926.00 Total: \$233,766 Expected savings: \$467,532

Data Sources: Average salary + benefits from fiscal year end reporting in JDE multiplied by CE#2.

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 Annual Recertifications: Total recertifications processed under annual schedule X average time to process a recertification	Projected Outcome (long-term target) Annual Benchmarks Recertification Schedule: Total recertifications processed under the new schedule X average time to process recertification
Definitions: Total time to complete recertifications during the fiscal year.	HCV: 18,000 hours PH: 8,325 hours Total: 26,325 hours	HCV: 6,000 hours PH: 2,775 hours Total: 8,775 hours Expected savings: 17,550 hours

Data Source: File processing reporting in Elite. Annual time study to determine average processing time -- currently set at 1.5 hours per recertification.

CE #3: Decrease in Error Rate of Task Execution		
Unit of Measurement	Baseline	Benchmarks



.Average error rate in completing a task as a percentage (decrease).	Performance level prior to implementation	Projected Outcome (long-term target) Annual Benchmarks
Definitions: Average error rate	HCV: 31% PH: 45%	HCV: 25% PH:40%

Data Source: Internal Audit Reporting

C. COST IMPLICATIONS

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

This activity is expected to result in cost savings to the Agency.

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 cost savings from the activity as anticipated in metric CE#1 will help continue to offset the reduction in federal funding for the low income public housing and housing choice voucher programs as well as the increase in administrative costs of other MTW activities -- allowing the Agency to continue to meet its statutory objective to serve substantially the same number of households as prior to the MTW designation.

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.

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

Explanation <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i>	Attachment C Authorization <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.</i>
EXISTING WAIVERS	
Alternate Schedules: 24 CFR 982.516(a)(1) states the PHA must conduct a reexamination of family income and composition at least annually. (HCV) 24 CFR 960.257 states (1) For families who pay an income-based rent, the PHA must conduct a reexamination of family income and composition at	Housing Choice Vouchers Attachment C, Section D.1.c., Operational Policies and Procedures: The Agency is authorized to define, adopt and implement a reexamination program that differs from the reexamination program currently mandated in the 1937 Act and its implementing regulations. <i>This authorization waives certain</i>



least annually and must make appropriate adjustments in the rent after consultation with the family and upon verification of the information. (2) For families who choose flat rents, the PHA must conduct a reexamination of family composition at least annually, and must conduct a reexamination of family income at least once every three years in accordance with the procedures in § 960.253(f). (3) For all families who include non exempt individuals, as defined in § 960.601, the PHA must determine compliance once each twelve months with community service and self-sufficiency requirements in subpart F of this part.

24 CFR 982.505(c)(4) states if the payment standard amount is increased during the term of the HAP contract, the increased payment standard amount shall be used to calculate the monthly housing assistance payment for the family beginning at the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard amount.

The Agency is requesting waivers in order to conduct reexaminations on an alternative schedule.

Alternate Income Verification Methods:

24 CFR 982.516(a)(3) and 24 CFR 960.257(c)(2) states the PHA may accept a family's declaration that it has net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the declaration and A PHA must obtain third-party verification of all family assets every 3 years. (HCV and PH)

The Agency is requesting a waiver in order to increase the asset amount to \$25,000 and obtain third-party verification per the alternate schedule.

provisions of Section 8(o)(5) of the 1937 Act and 24 C.F.R. 982.516 as necessary to implement the Agency's Annual MTW Plan.

Attachment C, Section D.3.b. Eligibility of Participants:

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.*

Public Housing

Attachment C, Section C.4., Initial, Annual, and Interim Income Review Process:

The Agency is authorized to restructure the initial, annual and interim review process in the public housing program in order to affect the frequency of the reviews and the methods and process used to establish the integrity of the income information provided. In addition, the Agency is expressly authorized to adopt a local system of income verification in lieu of the current HUD system. For example, the Agency may implement alternate time frames for validity of verification or adopt policies for verification of income and assets through sources other than those currently allowed under the 1937 Act. *This authorization waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R. 966.4 and 960.257, as necessary to implement the Agency's Annual MTW Plan.*

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).

Because this activity does not change rent calculation, this section is not required.

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.*
- (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.*
- (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.)*
- (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.*

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.

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.

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



FY2023-1: Property-based local, non-traditional rental subsidy program (referred to locally as *PH-like*)

The Agency is proposing to use its MTW flexibility to support current long-term strategies for ensuring SAHA residents have access to safe, quality, affordable housing.

Background: The Agency has identified a local housing need for more affordable housing that provides income-based rents for households earning up to 80% AMI. While other housing programs (i.e. tax-credits) offer housing units with relatively affordable rents and reserve these for extremely low income households, the rents are still quite unaffordable for these households. Currently the Agency is estimating that 30% of households on its waiting list have household incomes at or below 15% AMI. An additional 40% are between 15% and 30% AMI.

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

Under 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 requirements of the MTW statute. This activity proposed the creation of a new property-based local, non-traditional MTW rental housing program.

This activity leverages existing authorizations in Attachment D and specified in FY2011-1e which allow the agency to invest MTW funds to preserve and expand affordable housing. Local, non-traditional units (LNT) are defined as units that will be rented to or sold to families whose incomes are at or below 80% of AMI, but that are not public housing or project-based Housing Choice Voucher units.

The proposed LNT program will operate in accordance with the Agency's public housing program as codified in the Admissions and Continued Occupancy Policy (ACOP). For consistency and efficiency, all public housing MTW waivers will be applied to this program unless noted otherwise. The LNT program will operate a separate waitlist and establish a local preference for existing public housing residents.

Currently, the Agency owns several real estate properties and plans to self-develop new multi-family properties at these sites. Below is the list of current new development projects. As the Agency identifies new projects, those will be listed in the Agency's annual plans and/or reports. Projects are also listed in Appendix E: Asset Management Plan.

- Expected in FY2023:
 - Snowden Senior Apartments a 135-unit new construction apartment complex for seniors 62 years of age and older. The new development will provide a mix of one and two-bedroom units with appropriate design considerations for senior living



households and is anticipated to be 100% affordable with 40% (54) of the units subsidized by this new Project-based local, non-traditional rental subsidy program.

- Expected in FY2024 or later:
 - Alazan Courts: SAHA has hired a master planner for this project. Community engagement has begun and SAHA anticipates using this program as part of the re-development of the public housing property.
 - Artisan at Springview: This new development is planned to be a 325 unit community and may include units subsidized by this program.

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

This activity is designed to meet the statutory objectives of increasing housing choices for low-income families.

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

B. ACTIVITY METRICS INFORMATION

HUD Standard Metrics

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmark
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.	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).
	Zero	54 units in year 1

Data Source: This will be tracked using the 50058-MTW form and the Agency's housing software. The Agency will submit this form to HUD through PIC-IMS.

C. COST IMPLICATIONS

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

While estimated costs will vary by project, the current financial impact is estimated to be approximately \$732 per month per unit for a total of \$474,336 in year 1 of implementation. These costs are covering the rental subsidy amount only and will not be used for operational or capital expenditures.

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 will absorb the cost using MTW funding flexibilities.

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

Explanation <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i>	Attachment C Authorization <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.</i>
<p>This authorization is required because this rental subsidy program is outside of Section 8 and Section 9 of the 1937 Housing Act.</p> <p>In addition SAHA will comply with the requirements in PIH Notice 2011-45, Parameters for Local Non-Traditional Activities under the Moving to Work Demonstration Program.</p>	<p>This activity is authorized under the Use of Funds Amendment to Attachment D of the Amended and Restated MTW Agreement.</p>

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

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

Current Activity	Status
11-1e- Preservation and Expansion of Affordable Housing	Ongoing
11-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	Ongoing
13-2- Simplified Earned Income Disregard (S-EID) (Public Housing)	Ongoing
13-4- HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Ongoing
14-3- Faster Implementation of Payment Standard Decreases (HCV)	Ongoing
14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)	Ongoing
15-1- MDRC / HUD Rent Study	On hold / closing out in FY2022 Report
15-2- Elderly Admissions Preference at Select Public Housing Sites	Ongoing
15-3- Modified Project Based Vouchers	Ongoing
19-1- Local Implementation of SAFMR	Ongoing
19-2- Alternate Recertification Process (PH and HCV)	Ongoing
20-1- College & University Homeless Assistance Programs	Ongoing
20-3- Family Self Sufficiency (FSS) Program Streamlining	Ongoing
20-4- Time Limited Workforce Housing Pilot Program (PBV)	On hold / closing out in FY2022 Report
21-1- Next Step Housing Program (THRU Project)	Ongoing
21-2- Limiting increases in rents	Ongoing
22-1 SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions	Ongoing

On June 13, 2019, the Agency received HUD approval to extend specific MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of these waivers in FY2020¹. Below is a list of MTW activities apply to each program.

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

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



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



A. Implemented Activities

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The Agency has several projects in the development pipeline that are planned to utilize MTW funding. In addition, the agency is currently reviewing other existing affordable housing units that are either nearing the end of the 15 year compliance period or in need of preservation. The Agency anticipates leveraging MTW investments for these investments (see Appendix E. Asset Management Plan for additional details on the Agency's preservation and expansion plans)

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

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

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

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

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

This activity was revised for FY2016. Language describing Preservation and Expansion Policy context, background, and process was moved to Appendix 3. While the Preservation and Expansion Policy language can provide a helpful backdrop to the goals of FY2011-1e, it can also distract from the specific use of MTW flexibility. The language in FY2011-1e is now focused on the



use of MTW funds to preserve or expand affordable housing units without any Section 8 or Section 9 subsidy. Since no preservation of non-Section 8 or 9 units is planned for FY2016, the metric “HC #2: Units of Housing Preserved” has been set to a benchmark of 0 (zero).

iii. Planned Non-Significant Changes

In addition to new construction plans during the plan year, the agency expects to evaluate possible investment and/or acquisition of existing Low Income Housing Tax Credit (LIHTC) that are at or approaching the end of the initial 15 year compliance period. This may include properties where a SAHA related entity already holds an ownership interest in the asset, or has no ownership interest in the asset. The Agency may elect to use its border uses of funds authority to execute these financial deals. Listed below, are properties that are either at or approaching the fifteenth year where the Agency might use MTW funds either as part of the acquisition or at the time the tax credits are re-syndicated:

1. Rosemont at University Park
2. Rosemont at Bethel Place
3. San Juan Square I
4. San Juan Square II
5. Costa Mirada
6. Elan Gardens
7. Midcrowne Senior Pavilion
8. The Ravello
9. Alhambra
10. Artisan at Mission Creek
11. Artisan at Salado Falls
12. Tigon Villas

The Agency also maintains an affordable housing portfolio, Beacon Communities, and expects to evaluate possible investment in these properties as part of an agency-wide preservation effort.

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



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

i. Plan Year Approved, Implemented, Amended

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

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

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio by increasing housing choices.

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

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

iii. Planned Non-Significant Changes



None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



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

i. Plan Year Approved, Implemented, Amended

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

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

ii. Description/Update

Update: As of December 2021, there were 5 households enrolled in the SEID -- the last scheduled completion date is October 2024. As these households phase out, The Agency is reviewing this activity and new grant opportunities on the horizon to determine whether this alternate calculation will be necessary in supporting residents in achieving financial stability. The Agency may replace this activity or propose changes in an upcoming plan.

Statutory Goal	Housing Programs	Additional Requirements
<ul style="list-style-type: none">■ Self-Sufficiency■ Cost Effectiveness	<ul style="list-style-type: none">■ MTW Housing Choice Voucher■ Public Housing	<ul style="list-style-type: none">■ Must complete financial literacy classes■ Must enroll in an approved self-sufficiency program■ Current approved programs:<ul style="list-style-type: none">■ Westside Jobs Plus Program■ Annie E. Casey/East side Jobs Plus Program■ Self-sufficiency programs NOT approved:<ul style="list-style-type: none">■ 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 the 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 the Family Service Association or the Financial Empowerment Center. Participating households must attend the counseling sessions prior to the annual incremental reduction of EID, or within one month of the reduction being processed. Staff have access to the appointment log, 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 are not the result of staff time savings, but instead of increased efficiency.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



6. FY2014-6: HCV Rent Reform

Previously approved

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

i. Plan Year Approved, Implemented, Amended

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



7. 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. The implementation of the 80/20 mix has been delayed for Marie McGuire, but is expected to be implemented by the end of the current fiscal year.

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



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

i. Plan Year Approved, Implemented, Amended

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

FY2019-2020 Amendments:

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

FY2020-2021 Amendments:

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



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

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

ii. Description/Update

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

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

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

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

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



iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None.

v. Planned Significant Changes

None



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

i. Plan Year Approved, Implemented, Amended

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

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

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to increase housing choices. A new schedule and modifications to the groupings under Phase II was implemented for new admissions and movers effective January 1, 2022 and recertifications effective February 1, 2022.

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

The agency has adopted two SAFMR-specific mechanisms to provide protection for clients including (1) Hold Harmless Policy and (2) Exception Overlay Policy. In addition, clients have



access to existing hardship and reasonable accommodation policies outlined in 16.2.B(7) of the Administrative Plan. The mechanisms specific to SAFMR are described below.

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

Exception Overlay Policy

A. Exception Overlay Policy: Households will receive automatic exception overlay relief, as discussed below, if:

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

B. Exception Overlay Policy Remedy:

- a. SAHA will cap the total monthly family contribution at the current amount for the remaining months in their current lease term.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



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

See Section 2 for proposed changes to this activity.



11. FY2020-1: College & University Homeless Assistance Programs

(formerly Palo Alto College, College Homeless Assistance Program)

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity is in early implementation and SAHA continues to work with partners to address implementation challenges related to the ongoing pandemic.

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

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

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

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

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

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

- is under 24 years of age;



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

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

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

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

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

iii. Planned Non-Significant Changes

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



iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

Update: This activity has been implemented and is ongoing. The Agency is currently working with the partner to address ongoing challenges as a result of the pandemic.

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

Partner Program Overview

THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness². It will offer housing options and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth, in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and ultimately our most basic need; shelter. Each placement will focus on preparing the youth for living on their own while strengthening future families and breaking the negative cycles.

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

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

Activity Overview

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

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

Year 1 (12 months)

² Youth may currently be in extended foster care.



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

Years 2 and 3 (24 months)

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

Alignment with other MTW activities

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



14. FY2021-2: Limiting increases in rents

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency will be reviewing this activity to determine the feasibility of a sunset date given the ongoing nature of the pandemic and its impacts on the rental market.



15. FY2022-1: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions

i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices. In addition, this activity is in alignment with the Agency's strategic outcome to pursue partnerships that result in SAHA residents having access to basic non-housing needs. By excluding these contributions from the annual income, SAHA clients will be able to receive additional local support and not have their housing assistance negatively impacted. The activity was approved in the FY2021-2022 MTW Plan.

ii. Description/Update

Update: This activity has been implemented.

Description: This activity establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from a SAHA partner or contributions distributed to a household on behalf of a SAHA partner will not be included in the households annual income for purposes of calculating rent.

Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners. Examples include: (i) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (ii) cash or other liquid assets, and (iii) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



B. Not Yet Implemented Activities

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

The Activity was approved in the FY2020 MTW Plan. It was not implemented as a result of the development project not being executed as planned. This activity will be closed out in the FY2022 MTW Report.

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

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

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

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

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

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



C. Activities On Hold

FY2015-1: MDRC / HUD Rent Study

This activity was originally approved as part of the FY2014-2015 MTW Plan. The Agency plans a full close out report in the FY2022 MTW Report.

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.

D. Closed Out Activities

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.



6. 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.

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

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

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.



13. 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.

14. 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 but was closed out before implementation due to discussions with HUD about the RAD option.

15. 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.

16. 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 and was closed out in FY2017.

17. FY2013-3 Standardize Section 8 and Public Housing Inspection Progress

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

18. FY2014-4 Biennial Reexaminations (HCV and PH)

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

19. FY2014-5 Triennial Reexaminations (HCV)

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

20. FY2016-2 Biennial and Triennial Notification of Rent Type Option

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



21. FY2014-2 Early Engagement (previously referred to as Path to Self-Sufficiency)

This activity was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. Effective March 16, 2020, the Agency implemented its [Workplace Transition Plan](#), Transition Level 1, Emergency Operations. On June 22, 2020 the Agency transitioned to Level 2, Modified Operations. As a result, all EEP sessions were canceled. The last EEP session was held in February 2020. The activity was closed in the FY2021 Report.

22. FY2017-1 Thrive in Five

This activity was approved in December 2016 and implemented in FY2017. The activity was re-proposed to replace a previous pilot which was closed out in FY2016 (FY13-1 Limited Working Preference). This activity was closed out in the FY2021 Report.

23. FY2017-2 Restorative Housing Pilot Program

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. It was a two-year pilot program that was unsuccessful in reaching the target population. The activity was closed out in the FY2021 Report.

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

This activity was originally approved in FY2020 and designed to promote housing choices. The activity was never implemented as a result of the new development project planned for project-based vouchers was not executed. The partnership continues under the active FY2020-1 CHAP activity with tenant-based vouchers. This activity was closed out in the FY2021 Report.



Section V. PLANNED APPLICATION OF MTW FUNDS

A. Planned Application of MTW Funds

i. Estimated Sources of MTW Funds

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

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule (FDS).

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	11,805,057
70600	HUD PHA Operating Grants	137,856,508
70610	Capital Grants	10,421,892
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	4,992
71600	Gain or Loss on Sale of Capital Assets	(1,287,074)
71200+71300+71310+71400+71500	Other Income	2,484,460
70000	Total Revenue	\$161,285,835

ii. Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expending during the plan year should not be included in this section.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	18,890,428
91300+91310+92000	Management Fee Expense	9,226,418
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	1,530,645
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	5,852,613
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	19,833,723



95000 (95100+95200+95300+95500)	Total Protective Services	722,650
96100 (96110+96120+96130+96140)	Total Insurance Premiums	2,098,574
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	3,842,693
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	533,189
97100+97200	Total Extraordinary Maintenance	-
97300+97350	HAP + HAP Portability-In	97,895,765
97400	Depreciation Expense	10,046,437
97500+97600+97700+97800	All Other Expense	-
9000	Total Expenses	\$170,473,135

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

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

iii. Description of Planned Application of MTW Single Fund Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. 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 funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

Below are specific program uses of the moving to work funds that are not covered by other authorizations reported in other sections of this report.

- Community Development Initiatives:** The Agency uses moving to work funds to support the Community Development Initiatives Department for MTW program administration and implementation. These funds allow the Agency to provide higher quality supportive services to residents than would otherwise be permitted by grant funding alone. In addition, the Agency is able to more effectively engage with partners and leverage resources for the benefit of the residents.

Detailed below is more information on specific uses and programs.



- **Enhanced Resident Engagement:** MTW funds will be used to enhance existing resident engagement efforts including hiring a Resident Leadership Coordinator to assist Public Housing residents in forming and running resident councils including additional planning and administrative support for the expansion of resident engagement activities.
- **Food Distributions:** MTW funds will be used to continue to assist with food distributions for SAHA residents.
- **Jobs Plus Program:** MTW funds will be used in addition to grant funds to support the administration of the Jobs Plus Program at Lincoln Heights. The Jobs Plus program helps residents receive training and find employment opportunities. SAHA partners with Alamo Workforce Solutions to identify in-demand occupations, as well as employers willing to provide training or educational assistance.
- **Resident Apprentice:** MTW funds also support the Resident Apprenticeship Program which provides meaningful work experience for residents. SAHA has found that this program is an effective strategy to engage residents in educational, training, workforce development, and other self-sufficiency programs.
- **ConnectHomeSA:** The Agency uses MTW funds to support ConnectHomeSA. This program provides computer training courses. When residents complete six courses they earn a digital device.
- **Expansion of PH WiFi:** As part of the SAHA Road to Digital Inclusion initiative, MTW funds will be used to narrow the digital divide and bring much needed Internet connectivity and accessibility. This will include broadband service for Public Housing communities.
- **Choice Endowment:** MTW funds will be used in conjunction with grant funding to continue supportive services to residents as part of the Choice Neighborhood Initiative.
- **Youth Programming:** MTW funds will be used on two partnership projects that will serve SAHA youth through educational and afterschool programming onsite at public housing communities.

In addition to the used listed above, the organization will pay full Asset Management Fees for all Public Housing AMPs regardless of whether they meet the excess cash threshold.

iv. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY - Unspent Balances Projected at 6/30/2022	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$1.1 million	\$1.1 million

APPENDIX A: HUD Information Reporting Requirements | Section 5. Sources and Uses



HCV Admin Fee	\$3 million	\$3 million
PH Operating Subsidy	\$4.2 million	\$4.2 million
HUD-Held HCV Funds	\$62 million	\$62 million
TOTAL	\$67.6 million	\$67.6 million

v. Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

The MTW PHA shall provide a description of planned activities and/or use(s) for unexpended Operating Fund and HCV Funding. The original funding source is defined as the legacy MTW PHA's appropriated Section 8 and Section 9 funding source(s) (HCV HAP, HCV Admin Fee, and PH Operating Subsidy). The MTW agency receives this information in their Annual Renewal Allocation, which provides a breakdown of the annual obligations for HCV HAP. For HCV Admin Fee, the biannual cash management reconciliation includes the HCV Admin Fee that has been earned at two points during the year; midyear at June 30th and end-of-year at December 31st. For the public housing operating fund unspent balance, the MTW PHA may derive their unspent funds by subtracting current assets from current liabilities in the most recent FDS submission. Current assets are the sums of FDS lines 111, 114, 115, 120, 131, 135, 142, 144, and 145. Current liabilities are the sums of FDS line 310 and 343. Table XX below represents the applicable FDS lines with definitions that MTW PHA(s) should utilize to calculate public housing operating fund unspent funds. More information on FDS line items can be found at: https://www.hud.gov/sites/dfiles/PIH/documents/FDSLLineDefinitionGuide_vJuly2020.pdf.

Table XX: FDS Line Items Used to Calculate Public Housing Operating Fund Unspent Funds

FDS Line Number	FDS Line Item	Definition
Current Assets		
111	Cash-Unrestricted	This FDS line represents cash and cash equivalents in any form available for use to support any activity of the program or project.
114	Cash-Tenant Security Deposits	This FDS line represents cash in the Security Deposit Fund.
115	Cash-Restricted for Payment of Current Liabilities	This line represents restricted cash and cash equivalents that are only to be expended for specified purposes.
120	Total Receivables	This line represents the total of all receivables less the amounts established as allowances for estimated uncollectible amounts.
131	Investments-Unrestricted	This line represents the fair market value of all investments which can be used to support any activity of a program, project, activity, COCC, or entities.
135	Investments-Restricted for Payment of Current Liability	This line represents the fair market value of all investments designated for specific purposes that will be used to liquidate a current liability in the next fiscal year or offset unearned revenue.
142	Prepaid Expenses and Other Assets	This line represents all prepaid expenses. These are not expected to be converted.
144	Inter-program-Due From	This line represents amounts due from other PHA projects, programs, and activities of a temporary nature.
145	Assets Held for Sale	This line item represents assets that the entity expects to sell to qualified applicants. This line item is typically used as part of the homeownership program.
Current Liabilities		



310	Total Current Liabilities	This FDS line is the sum of lines 311 through 348 and represents the total of all current liabilities.
343	Current Portion of Long-Term Debt (Capital Projects/Bonds)	This line includes the current portion of debts acquired and debts issued for capital purposes of the PHA/entity.

For HCV funding, the biannual cash management reconciliation for HUD-held reserves includes both HCV and SPV reserves. MTW PHA(s)' accounting records should include sufficient detail to report on the amount that are HCV versus SPV reserves. Where possible, please identify the planned use, the estimated amount, to which funding source the planned use(s) is attributable, as well as the projected timeline or timeline update.

Note: the information collected in this section is to fulfill MTW programmatic reporting requirements and does not replace the MTW PHA's obligation to annually complete its audited financial statements through HUD's Financial Data Schedule.

Per Board Resolution 6238 dated June 1, 2022, SAHA Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

- Section 8 funding shortfall - \$1.10 million
- Public Housing operating shortfall - \$4.3 million
- Resident Services (CDI) - \$2.3 million
- Central Office operating shortfall - \$.8 million
- Alazan Predevelopment costs - \$34.6 million
- Public Housing WiFi Service - \$1 million
- Investment in MTW units at Tax Credit/Beacon properties - \$5 million
- Preservation and expansion of affordable and public housing - \$5 million
- Snowden Development Funding gap - \$8.5 million
- Lincoln Predevelopment costs - \$2 million
- Building Readiness for Child Care centers - \$3 million

Total MTW funds obligated is \$67.6 million.

* Unspent HAP funding should not include amounts recognized as Special Purpose Vouchers reserves.

** HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan

B. Local Asset Management Plan

- Is the MTW PHA allocating costs within statute? **Yes**
- Is the MTW PHA implementing a local asset management plan (LAMP)? **No**
- Has the MTW PHA provided a LAMP in the appendix? **No**
- 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.



forward with participation but will periodically explore the feasibility of RAD as things may change.

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

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



Section VI. Administrative

(VI) ADMINISTRATIVE	
ANNUAL MTW PLAN	
<p>A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE</p> <p>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.</p>	See Appendix B
<p>B. DOCUMENTATION OF PUBLIC PROCESS</p> <p>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).</p>	See Appendix B
<p>C. PLANNED AND ONGOING EVALUATIONS</p> <p>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).</p>	FY2015-1: MDRC / HUD Rent Study is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency is currently working to close this activity and complete final participation activities.
<p>D. LOBBYING DISCLOSURES</p> <p>The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).</p>	See Appendix B



APPENDIX B: RESOLUTIONS AND CERTIFICATIONS

Appendix B is reserved for the Agency's resolutions, certifications, and other documentation requirements as required by HUD Form 50900: Elements of Annual MTW Plan.

The following will be provided upon submission to HUD.

1. Board Resolution and Certifications of Compliance
2. Public posting materials
3. Operations Committee materials
4. Public comment documentation
 - a. Public comment documentation
 - b. FY2023 MTW Plan Outreach Overview and Summary Report
5. Lobbying Disclosures
 - a. (SF-LLL)
 - b. (HUD-50071)



APPENDIX B.1.: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE



CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC 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 Chair 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 (07/01/2022), 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.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI), Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, 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), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents 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 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (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 identity, or marital status.
- (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 75.
- (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 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) 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.
- (23) 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

TX006

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Ed Hinojosa, Jr.

President and CEO

NAME OF AUTHORIZED OFFICIAL

TITLE

SIGNATURE

DATE

* **Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

SAN ANTONIO HOUSING AUTHORITY

April 6, 2022

BOARD OF COMMISSIONERS
Regular Board Meeting**RESOLUTION 6223, AUTHORIZING THE PROPOSED 2022-2023 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), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

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Ed Hinojosa, Jr.**President and CEO**

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Richard Milk**Planning Officer****REQUESTED ACTION:**

Consideration and approval regarding Resolution 6223, authorizing the proposed 2022-2023 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), the Capital Fund Program Plan (CFP), the five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action plan.

SUMMARY:

The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to annually submit a five-year plan and an annual business plan, commonly referred to as the Agency Plan(s). Due to SAHA's designation as a Moving-to-Work (MTW) agency, the MTW Plan serves as SAHA's Agency Plan. The MTW Plan includes: the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), and the Capital Fund Program Plan. The MTW Plan also describes SAHA's policies, programs, operations, strategies and flexibilities in meeting the local housing needs and goals.

The 2022-2023 MTW Plan is an integral element of the agency's five-year Strategic Plan.

SAHA is on track to complete the 2022-2023 Agency Plan in time for April submission to HUD.

- I. **Proposed New MTW Activities:** The Agency is proposing one new MTW activity.
 - FY2023-1: Project-based local, non-traditional rental subsidy program - The Agency is proposing to create a new local housing program that provides affordable housing with income-based rents at new self-developed properties.
- II. **Proposed Changes to Existing Activities:** The Agency is proposing changes to one existing activity.
 - FY2019-2: Alternate Recertification Process (PH and HCV) - The Agency is re-proposing the existing activity and requesting approval to modify the existing alternate schedule. The change would move all households to a recertification scheduled every three years.

SAN ANTONIO HOUSING AUTHORITY**April 6, 2022****III. Revisions to Public Housing (PH) Admissions & Continued Occupancy (ACOP) Only**

- 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.
- 5.1.B DETERMINING UNIT SIZE
 - This section was changed in order to align with the existing policy in the Housing Choice Voucher Program located in 5.2.B of the FY20-21 Administrative Plan.
- 8.1.E SECURITY DEPOSITS
 - This section was changed to provide the former resident with notice of charges within 30 days from the date of move out in order to align with Texas Property Code.
- 9.1.C SCHEDULING ANNUAL REEXAMINATIONS, 9.1.E FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253], and 9.2.B FULL REEXAMINATION OF FAMILY INCOME AND COMPOSITION
 - Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.
- 9.3.C(3)(b) CHANGES AFFECTING INCOME OR EXPENSES
 - This change was made in order to allow staff to process all increases in income, regardless of amounts, for Jobs Plus Participants at Lincoln Heights participating in the Jobs Plus Earned Income Disregard (JPEID).
- 12.2.B (6) OCCUPANCY STANDARDS TRANSFERS - ADMINISTRATIVE CATEGORY 1
 - Language was changed to allow for flexibility when processing transfer requests based on the circumstances of the family and unit availability. This aligns with HUD policy on unit transfers.
- 13.3.C (2) OTHER GOOD CAUSE [24 CFR 966.4(l)(2)(ii)(B) and (C)]
 - Language was changed to align with the revision noted above, this was done to clarify that SAHA will not terminate the lease if the transfer is not required.

IV. Revisions to Housing Choice Voucher (HCV) Administrative Plan Only

- 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.
- 6.3.C APPLYING PAYMENT STANDARDS [24 Cfr 982.505; 982.506(B)]
 - Language was added to clarify the application of increased payment standards in between recertifications.
- 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 in 7.1.B(2)(b) to specify that the agency will accept clear and legible photos or digital scans of original documents.
- 8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT
 - Language was removed from 8.2.F(3) and 8.2.F(4) since SAHA will no longer permit landlords to self certify Housing Quality Standards (HQS) inspections. The current self-certification policy creates undue administrative procedure / burden and adds time to the inspections process, which leads to landlord and resident

SAN ANTONIO HOUSING AUTHORITY**April 6, 2022**

complaints. Additionally, the resident is not always aware of the items that have or have not been repaired, and sometimes signs the self certification without repairs being completed.

- **11.1.C SCHEDULING ANNUAL REEXAMINATIONS**
 - Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.
- **EXHIBIT 16-2: SAHA EMERGENCY TRANSFER PLAN**
 - Language was added to Exhibit 16-2 Part 4 Section 5: Emergency Transfer Timing and Availability.
- **19.4 MOVE ON PROGRAM**
 - Language was added in 19.4.A(1) for a general category of "other supportive housing" to continue to communicate the flexibility we have 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.

V. Family Self-Sufficiency (FSS) Action Plan

- **5.2.F Termination of the Contract**
 - This section includes an overview of reasons and cause for termination of the contract. This section did not include a definition of withdrawal from the FSS program, which is needed to ensure FSS program participants have a full understanding of withdrawal from the FSS program.

VI. Capital Fund Program (CFP): General description of all planned Capital Fund Expenditures during the plan year

- **Housing Preservation Plans:**
 - Public Housing: Over next 5 years, plans 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.
- **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.

MTW TIMELINE

- February: Draft MTW Plan posted for public comment
- March: Public Hearing scheduled during Operations and Real Estate 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

SAN ANTONIO HOUSING AUTHORITY

April 6, 2022

FINANCIAL IMPACT:

Under SAHA's MTW Plan, Public Housing, Housing Choice Voucher Program and Capital Fund resources are all combined into a single fund with full-funding flexibility. All MTW initiatives will continue to be funded from this single fund.

STRATEGIC OUTCOME:

Supports all strategic outcomes.

ATTACHMENTS:

Resolution 6223

Presentation

**San Antonio Housing Authority
Resolution 6223**

RESOLUTION 6223, AUTHORIZING THE PROPOSED 2022-2023 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), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION 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 2022-2023 Moving to Work (MTW) Agency Plan for fiscal year 2022-2023, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), and the Family Self-Sufficiency (FSS) Program Action plan; and

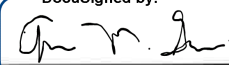
WHEREAS, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2022-2023 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

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 6223, authorizing the proposed 2022-2023 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), the Capital Fund Program Plan (CFP), the five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan; and
- 2) Authorizes the Chair and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2022-2023 MTW Plan to HUD.

Approved the 6th day of April 2022.

DocuSigned by:


Ana M. "Cha" Guzman
Chair, Board of Commissioners

Attested and approved as to form:



Ed Hinojosa, Jr.
President and CEO

APPENDIX B.2.: PUBLIC POSTING MATERIALS





BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair	Olga Kauffman Vice Chair	Gilbert Casillas Commissioner	Dalia Contreras Commissioner	Loren D. Dantzler Commissioner	Gabriel Lopez Commissioner	Ignacio Perez Commissioner
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PRESIDENT & CEO

Ed Hinojosa, Jr.

COSA - CITY CLERK
2022 FEB 14 PM02:32:53

**SAN ANTONIO HOUSING AUTHORITY
PUBLIC HEARING**

Call In Phone Number: (346) 248-7799
Meeting ID: 93839434337# Passcode: 654170#
818 S. Flores St., San Antonio, TX 78204
1:00 p.m., Wednesday, March 16, 2022

At least four Commissioners will be physically present at this location, but up to three other Commissioners may attend by videoconferencing, as permitted by Tex. Gov't Code Section 551.127. The Presiding officer will also be present at this location.

PROPOSED 2022–2023 MOVING TO WORK AGENCY PLAN AND PUBLIC HOUSING LEASE UPDATES

1. Introduction and Background (Richard Milk, Planning Officer)
2. Proposed 2022-2023 Moving to Work Agency Plan (Richard Milk, Planning Officer)
 - Moving to Work Plan
 - Public Housing Admissions and Continued Occupancy Plan
 - Housing Choice Voucher Administrative Plan
 - Capital Fund Program Plan
 - Family Self-Sufficiency (FSS) Program Action Plan
3. Proposed 2022-2023 Public Housing Lease Updates (Zachariah Woodard, Director of Public Housing)
4. Public Comments/Feedback
5. Summary and Next Steps (Richard Milk, Planning Officer)



San Antonio Housing Authority
818 S. Flores St. • P.O. Box 1300
San Antonio, TX 78295-1300
Phone: (210) 477-6000
www.saha.org

COSA - CITY CLERK
2022 FEB 14 PM02:32:47

Public Notice of Public Hearing
Regarding the SAHA Proposed 2022–2023 MTW Agency Plan and
Public Housing Lease Updates

Take notice that a 30-day public comment period

began on Monday, February 14, 2022, and ends on Tuesday, March 15, 2022, on the San Antonio Housing Authority's Proposed 2022–2023 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, Capital Fund Program Plan, and the Family Self-Sufficiency (FSS) Program Action Plan; and the Proposed 2022-2023 Public Housing Lease Updates.

Comments on changes may be delivered by electronic mail to mtw@saha.org. All comments are due by 5:00 pm on March 15, 2022.

Take notice that a Public Hearing of the

Board of Commissioners will be held at the San Antonio Housing Authority, 818 S. Flores St., San Antonio, TX, 78204 and via teleconference by accessing Phone Number: **(346) 248-7799** and enter Meeting ID: **93839434337#** and Passcode: **654170#**, prior to 1:00 p.m., commencing on March 16, 2022, to consider and act upon items shown on the attached agenda.

Documents are available for viewing online at www.saha.org.

DATED: February 14, 2022

Housing Authority of the City of San Antonio, Texas

DocuSigned by:

Ed Hinojosa Jr

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Ed Hinojosa, Jr.

President and CEO

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Meeting site is accessible to handicapped persons. Accessible parking is located at
818 S. Flores Street, San Antonio, TX, 78204.

APPENDIX B.3.: OPERATIONS COMMITTEE MATERIALS



SAN ANTONIO HOUSING AUTHORITY

March 16, 2022

BOARD OF COMMISSIONERS
Operations and Choice Neighborhood Committee

RESOLUTION 6223, AUTHORIZING THE PROPOSED 2022-2023 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), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

DocuSigned by:

Ed Hinojosa

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Ed Hinojosa, Jr.
President and CEO

DocuSigned by:

Richard Milk

051202290235493...

Richard Milk
Planning Officer

REQUESTED ACTION:

Hold a Public Hearing and consideration and appropriate action regarding Resolution 6223, authorizing the proposed 2022-2023 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), the Capital Fund Program Plan (CFP), the five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action plan.

SUMMARY:

The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to annually submit a five-year plan and an annual business plan, commonly referred to as the Agency Plan(s). Due to SAHA's designation as a Moving-to-Work (MTW) agency, the MTW Plan serves as SAHA's Agency Plan. The MTW Plan includes: the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), and the Capital Fund Program Plan. The MTW Plan also describes SAHA's policies, programs, operations, strategies and flexibilities in meeting the local housing needs and goals.

The 2022-2023 MTW Plan is an integral element of the agency's five-year Strategic Plan.

SAHA is on track to complete the 2022-2023 Agency Plan in time for April submission to HUD.

- I. **Proposed New MTW Activities:** The Agency is proposing one new MTW activity.
 - FY2023-1: Project-based local, non-traditional rental subsidy program - The Agency is proposing to create a new local housing program that provides affordable housing with income-based rents at new self-developed properties.
- II. **Proposed Changes to Existing Activities:** The Agency is proposing changes to one existing activity.
 - FY2019-2: Alternate Recertification Process (PH and HCV) - The Agency is re-proposing the existing activity and requesting approval to modify the existing alternate schedule. The change would move all households to a recertification scheduled every three years.

SAN ANTONIO HOUSING AUTHORITY**March 16, 2022****III. Revisions to Public Housing (PH) Admissions & Continued Occupancy (ACOP) Only**

- 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.
- 5.1.B DETERMINING UNIT SIZE
 - This section was changed in order to align with the existing policy in the Housing Choice Voucher Program located in 5.2.B of the FY20-21 Administrative Plan.
- 8.1.E SECURITY DEPOSITS
 - This section was changed to provide the former resident with notice of charges within 30 days from the date of move out in order to align with Texas Property Code.
- 9.1.C SCHEDULING ANNUAL REEXAMINATIONS, 9.1.E FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253], and 9.2.B FULL REEXAMINATION OF FAMILY INCOME AND COMPOSITION
 - Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.
- 9.3.C(3)(b) CHANGES AFFECTING INCOME OR EXPENSES
 - This change was made in order to allow staff to process all increases in income, regardless of amounts, for Jobs Plus Participants at Lincoln Heights participating in the Jobs Plus Earned Income Disregard (JPEID).
- 12.2.B (6) OCCUPANCY STANDARDS TRANSFERS - ADMINISTRATIVE CATEGORY 1
 - Language was changed to allow for flexibility when processing transfer requests based on the circumstances of the family and unit availability. This aligns with HUD policy on unit transfers.
- 13.3.C (2) OTHER GOOD CAUSE [24 CFR 966.4(l)(2)(ii)(B) and (C)]
 - Language was changed to align with the revision noted above, this was done to clarify that SAHA will not terminate the lease if the transfer is not required.

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SAN ANTONIO HOUSING AUTHORITY**March 16, 2022**

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V. Family Self-Sufficiency (FSS) Action Plan

- **5.2.F Termination of the Contract**
 - This section includes an overview of reasons and cause for termination of the contract. This section did not include a definition of withdrawal from the FSS program, which is needed to ensure FSS program participants have a full understanding of withdrawal from the FSS program.

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- **Housing Preservation Plans:**
 - Public Housing: Over next 5 years, plans 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.
- **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.

MTW TIMELINE

- February: Draft MTW Plan posted for public comment
- March: Public Hearing scheduled during Operations and Real Estate 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

SAN ANTONIO HOUSING AUTHORITY

March 16, 2022

FINANCIAL IMPACT:

Under SAHA's MTW Plan, Public Housing, Housing Choice Voucher Program and Capital Fund resources are all combined into a single fund with full-funding flexibility. All MTW initiatives will continue to be funded from this single fund.

STRATEGIC OUTCOME:

Supports all strategic outcomes.

ATTACHMENTS:

Resolution 6223

Presentation

**San Antonio Housing Authority
Resolution 6223**

RESOLUTION 6223, AUTHORIZING THE PROPOSED 2022-2023 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), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

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WHEREAS, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2022-2023 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.

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- 2) Authorizes the Chair and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2022-2023 MTW Plan to HUD.

Approved the 6th day of April 2022.

Ana M. “Cha” Guzman
Chair, Board of Commissioners

Attested and approved as to form:

Ed Hinojosa, Jr.
President and CEO



DRAFT MTW PLAN 2023

Operations and Real Estate Committee

March 16, 2022

PLANNING CONTEXT

2

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

MTW OVERVIEW

The Moving to Work Designation allows the agency to work differently than other PHAs by allowing the agency to waive some regulatory waivers and combine funding for approved non-traditional uses.

1

REGULATORY WAIVERS

2

FUNDING FUNGIBILITY

MTW SOURCES OF FUNDS

Dept of Housing and
Urban Development

PH Operating
Subsidy

HCV Block Grant
funding

PH CFP (including
DDTF) Grants

PH Rental & Other
Income (rents +
other charges)

**Fungibility
via Budget
Process**

MTW USES OF FUNDS

PH Operating
Expenses

HCV Operating
Expenses

PH Capital
Improvements

MTW Flexible 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.

MTW PROCESS AND PUBLIC COMMENT

5

ANNUAL SUBMISSION OF AGENCY PLANS TO HUD

- Moving to Work (MTW) Plan
- Assisted Housing Programs Administrative Plan (Admin 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

MTW PLAN TIMELINE

6

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 Real Estate 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

7

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

ASSET MANAGEMENT PLAN AND CFP

8

Proposed Housing Preservation Plans

- Public Housing: Over next 5 years, plans 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 FSS ACTION PLAN CHANGES

10

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

PROPOSED ACOP AND ADMIN PLAN REVISIONS

12

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.

PROPOSED ACOP AND ADMIN PLAN REVISIONS

13

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 ACOP REVISIONS

15

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 ACOP REVISIONS

16

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 ACOP REVISIONS

17

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 ACOP REVISIONS

18

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 PH LEASE UPDATES

20

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 PH LEASE UPDATES

21

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 PH LEASE UPDATES

22

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 PH LEASE UPDATES

23

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 ADMIN PLAN REVISIONS

25

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.

PROPOSED ADMIN PLAN REVISIONS

26

Proposed changes that apply to the **ADMIN PLAN** only (continued)

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.

PROPOSED ADMIN PLAN REVISIONS

27

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.

PROPOSED ADMIN PLAN REVISIONS

28

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.

PROPOSED ADMIN PLAN REVISIONS

29

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.

NEXT STEPS

30

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, emailed to MTW@saha.org, 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**.

QUESTIONS + FEEDBACK

EMAIL

mtw@saha.org

MAIL

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

APPENDIX B.4.a.:PUBLIC COMMENT DOCUMENTATION

The 2023 MTW Plan was originally posted for public comment on February 14, 2022. The draft Plan was posted on SAHA's website.

The public comment period closed on March 15, 2022 at 5 p.m.

A variety of opportunities were provided for public comment, including via email to mtw@saha.org, by mail to 818 S. Flores, at two public hearings, at three resident public comment meetings, and, through a survey outreach plan.

Appendix B.4.b. FY2023 MTW PLAN OUTREACH OVERVIEW AND SUMMARY REPORT provides a summary of the outreach efforts and public comment feedback received.



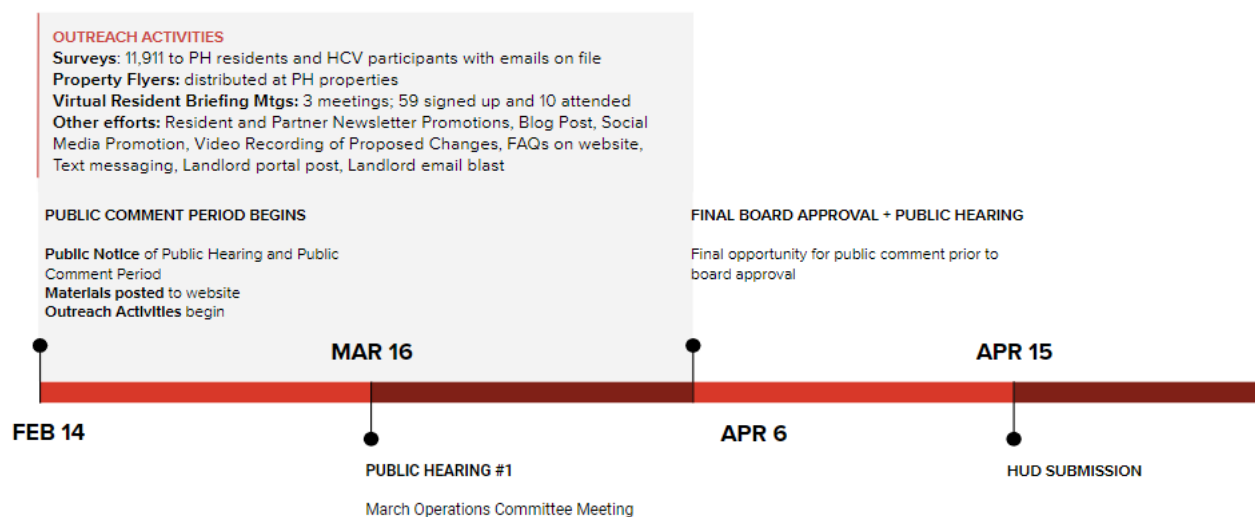
APPENDIX B.4.b.: FY2023 MTW PLAN OUTREACH OVERVIEW AND PUBLIC COMMENT SUMMARY REPORT

Outreach Overview

The Agency's outreach effort was driven by two main goals. The first was to reach and engage as many residents as possible during the ongoing COVID-19 pandemic and the most recent OMICRON surge. Outreach activities were intended to provide as many avenues for connecting with residents as possible. The second goal was to collect public comment on the proposed changes in the MTW Plan including program policy changes in the following implementation documents: ACOP, ADMIN, and FSS Action Plans.

In addition to the activities described throughout this summary report, the Agency provided a recorded presentation with descriptions of proposed policy changes in addition to documents with written summaries of the proposed changes. These materials were made available on saha.org.

Figure 1. MTW Timeline and Outreach Activities



Feedback Overview

The Agency received feedback from over 520 people during the comment period. In general, most feedback was either positive or neutral. Neutral feedback was primarily driven by the survey responses; there are inherent limitations to using surveys to collect feedback on policy changes. As a result, the Agency monitored survey results as they came in and used responses to inform other work including which policies should be explained in further detail during resident briefings. For example, during virtual briefing meetings staff were able to further explain the proposed



changes with higher neutral responses so residents were able to get the clarifications they needed. These explanations were also recorded and then broadcast at properties and posted on the website.

All feedback was reviewed and considered in the final drafting of the plan. Below is a summary of the feedback received by plan and/or topic area and the final status of the proposed change.

1. MTW Plan

Proposed Change	Feedback Overview	Adjustments to Plan
MTW Plan: Triennial Recertification	Over 80% of survey responses and 100% of other feedback received on this proposed change were supported.	None
MTW Local Property-Based Housing Program	Over 63% of survey responses were supportive. Nearly 30% were not sure. There was no other feedback received.	None

2. ACOP - Public Housing

Proposed Change	Feedback Overview	Adjustments to Plan
ACOP: APPLICANT CRIMINAL SCREENING GRID	Nearly 62% of survey responses were supportive. Roughly 25% were not sure. Other comments received were supportive of the screening grid.	None
ACOP: 5.1.B DETERMINING UNIT SIZE	Nearly 85% of survey responses were supportive.	None
ACOP: 8.1.E SECURITY DEPOSITS	Nearly 78% of survey responses were supportive.	None
ACOP: 12.2.B OCCUPANCY STANDARDS TRANSFERS	Nearly 88% of survey responses were supportive.	None
ACOP: 13.3.C (2) OTHER GOOD CAUSE [24 CFR 966.4(l)(2)(ii)(B) and (C)]	48% of survey responses were supportive. Nearly 20% were not sure. SAHA received questions regarding this proposed change during the resident virtual briefings and clarified that the change provides the Agency more flexibility to not terminate a lease if the transfer is not required.	None

3. Public Housing Lease



Proposed Change	Feedback Overview	Adjustments to Plan
PH LEASE: GARAGE/YARD SALES	Nearly 65% of survey responses were supportive.	Yes, staff will add clarifying language stating Resident Council sponsorship is permitted as long as it is coordinated with property management.
PH LEASE: FIREARMS	Nearly 65% of survey responses were supportive.	None
PH LEASE: GRIEVANCE PROCEDURES	Nearly 71% of survey responses were supportive.	None
PH LEASE: PET DEPOSIT	Nearly 66% of survey responses were supportive.	None
PH LEASE: UNAUTHORIZED PET FEE	Nearly 60% of survey responses were supportive.	None

4. ADMIN PLAN

Proposed Change	Feedback Overview	Adjustments to Plan
ADMIN PLAN: Applicant Criminal History Grid	Nearly 64% of survey responses were supportive. Roughly 20% were not sure. Other comments received were supportive of the screening grid.	None
ADMIN PLAN: HCV - PHOTOS & DIGITAL SCANS	Nearly 86% of survey responses were supportive. There was no other feedback received.	None
HCV - REMOVAL OF SELF CERTIFICATION	Nearly 66% of survey responses were supportive; however, 71% of landlord responses strongly opposed this change.	None
HCV - ADDRESSING MOD REHAB IN EMERGENCY PLAN	Nearly 70% of survey responses were supportive. There was no other feedback received.	None
HCV - MTW MOVE ON PROGRAM PARAMETERS	Nearly 80% of survey responses were supportive. There was no other feedback received.	None

5. FSS ACTION PLAN

Proposed Change	Feedback Overview	Adjustments to Plan
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FSS ACTION PLAN: DEFINING FSS PROGRAM WITHDRAW	Nearly 51% of survey responses were supportive. Roughly 33% were not sure.	None
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6. OTHER

- Section 5 - Source and Uses: Resident Ambassador Program: Language was updated to reflect SAHA's new Apprentice Program. Additional updates to this section will be completed in June 2022 once the Agency has completed the annual budgeting process for FY2023.

The following sections provide further details on the agency's outreach efforts as well as feedback received during the public comment period. Sections below are organized by main outreach activity.

Public Hearing

The Agency held a public hearing on the draft FY2023 Moving-to-Work (MTW) Plan on March 16, 2022 during the Operations and Real Estate Committee Meeting. Three community members signed-up to provide comments. The following table provides a summarized list of questions and comments received during the meeting.

Table 1. Public Hearing Summary

#	Question/Comment	Staff Response(s)
1	Can the Resident Council sponsor Garage Sales?	This will be clarified to note whether resident councils can sponsor. The intent is to ensure property management is kept informed of occasions when non-residents may be visiting the property.
2	Does SAHA require residents to disclose ownership of firearms?	We do not require residents disclose ownership of firearms.
3	Is there a Master Capital Improvement Plan? What is the process for prioritization?	The Agency plans for capital improvements as part of the budgeting process. The Agency has two approaches to capital planning. For federal programs, the Agency reviews anticipated Capital Fund Program funding. For Beacon communities, the approach includes planning for how to refinance the property and then assessing what capital investment that property may need.
4	How do we work with foster parents who may have children in and out of their home?	Staff work with the foster agencies and there is flexibility in the policy to work with families.
5	"I think that the three year recertification	The new policy will not go into effect until SAHA receives



#	Question/Comment	Staff Response(s)
	is excellent. These recertifications take a lot of time” When will these start? What happens to recerts that are due now? Do we need to wait for HUD approval?	approval from HUD and then implements the policy. SAHA anticipates implementation will start July 1, 2022.
3	The four to one elderly ratio at some of the properties. The plan states “The goal of the activity is to address continuing concerns of elderly residents at specific communities regarding lifestyle conflicts between elderly elderly”. “I don't see any difference between the elderly elderly and non elderly and elderly conflicts...” “And we have conflict between everybody you don't have to be elderly or non elderly so i'm wondering if y'all shouldn't look at that and maybe modify it some way.” “Because it doesn't matter whether you're elderly or non elderly there is conflict anyway” (page 33: FY2015-2- Elderly Admissions Preference at Select Public Housing Sites)	The Agency will be exploring ways to bring services to residents that will support conflict resolution and relationship building.
4	How do you select residents to be ambassadors? “Some residents are troublemakers and the last thing they need to do is be ambassadors, which gives them the more opportunity to create problems for other residents and so i'm wondering if that shouldn't be looked at all” (page 57: Resident Ambassador Program)	SAHA replaced the Ambassador program with a training-based Apprentice Program. This language will be updated in the final plan. All residents hired through the previous Ambassador Program and the new Apprentice Program must complete the Agency's hiring process established by the Agency's Human Resources Department. Resident apprentices are closely monitored and supervised to ensure they develop the job skills and experience necessary to succeed in their future career endeavors.
5	“Thank you for saving me because I lived in Streets for a long time... There's a lot of drug dealing and shooting.” Commenter noted that the police did not come in time. Commenter requested help from SAHA and police so he can feel safe in his home and at his community outside.	SAHA and San Antonio Police Department Partnership: Dr. Guzman and Ed Hinojosa met with San Antonio Police Chief William McManus to discuss a partnership to improve security and safety at public housing communities.
6	Commenter noted that people are at the property when they do not belong	SAHA takes these issues very seriously and will follow-up with the local police chief to develop a plan to address

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#	Question/Comment	Staff Response(s)
	there. Commenters noted she is scared and afraid of her clothes getting stolen from the clothesline outside. Commenter shared experience with witnessing violence, drug activity, and other criminal activity. Commenter mentioned calling police but the issues are persistent.	these issues.

Virtual Resident Briefings

The Agency held three zoom meetings on February 28th (12 p.m.), March 1st (6 p.m.), and March 3rd (11 a.m.) for residents. Across the three meetings, there were 59 registered; and 10 attendees were confirmed to be residents. The following table provides a list of questions and comments addressed during the meetings.

Table 2. Resident Briefings Summary

#	Question	Staff Response(s)
1	Is this slideshow going to be posted anywhere?	The slideshow is posted on SAHA's website at saha.org/public-notice .
2	Does the tenant have to report an increase or decrease in rent?	<p>For Public Housing and Voucher Programs families, decreases in income must always be reported to ensure you are not overpaying your portion of the rent. For the Voucher Programs, increases in income do not need to be reported unless the family is participating in the FSS Program, the Homeownership Program, or if they have previously reported zero income. For Public Housing, increases over \$200 must be reported, and all increases in income must be reported for families participating in the FSS Program, Earned Income Disregard (EID), Jobs Plus EID, and those who have previously reported zero income.</p> <p>Additionally, please note that for the Voucher Programs, any change in the total rent charged to families must be requested by partnering landlords through submission of the Request for Rental Increase form found on SAHA's website.</p>
3	Will units be inspected every 3 years?	For the Section 8 Voucher Program, the Housing Quality Standards inspections take place every 2 years. For Public Housing, the Uniform Physical Condition Standards



#	Question	Staff Response(s)
		inspections take place every year.
4	Would tenants be told about increases in rent from SAHA?	Yes, all SAHA families must receive, and sign off on, a landlord's Request for Rent Change Form to notify them of any changes in their rent.
5	If I just renewed my lease this month, do I still have to renew my lease every year?	For the Public Housing and Section 8 Voucher Programs, the triennial recertifications schedule does not change the existing lease renewal process. Families will continue to sign an initial 1-year lease which is then automatically renewed every year, unless there is a change. Changes that would result in a new lease needing to be re-executed include changes to the responsibility of appliances or utilities.
6	Who can we notify within SAHA?	Please contact your caseworker or contact SAHA's Customer Service Team at (210) 477-6000.
7	Will the income increase change be for those with SSI?	No, increases in income do not need to be reported unless the family has previously reported zero income or if they are participating in the FSS Program; if the family is in Public Housing and the increase is over \$200, or if they are participating in Earned Income Disregard (EID) or Jobs Plus EID; or if the family is in the Voucher Programs and participating in the Homeownership Program.
8	If I am with Bexar County Housing Authority, am I able to switch over to SAHA during my lease or would I have to wait until my lease is up?	Residents wishing to move their housing assistance to SAHA must contact their current housing authority to begin the Portability process. In this case, Bexar County Housing Authority would inform SAHA of the transfer and lease dates would be coordinated through this process.
9	Will you please provide a scenario on payment standards?	The payment standards are provided to PHAs annually by HUD and analyzed/updated by SAHA to apply to current families. Currently, SAHA processes a new payment standard at the time of a recertification. SAHA is moving to continue to update payment standards at the time of recertification and when a partnering landlord requests a rental increase.
10	With rental prices going up, are there any plans to buy more houses specifically in the SE side of town for vouchers?	For the Voucher Programs, SAHA does not purchase or own any units. SAHA does have expansion plans that include the development of new multi-family housing units across the city that will accept vouchers.
11	Does that [Increase in Payment Standards Proposed Policy Change] mean our family will be allowed for an increase in assistance?	This policy change only requires families in the Jobs Plus Earned Income Disregard Program to report to SAHA any increases in their income.
12	Does SAHA have a listing of any new	SAHA does not host any databases for units available to



#	Question	Staff Response(s)
	apartments, duplexes etc. that tenants may check frequently?	Voucher Programs families, but a third-party resource is listed below. For the Voucher Programs: affordablehousing.com For Public Housing, SAHA maintains a listing of SAHA communities and a map here . For Beacon and Partnerships properties, SAHA maintains a listing here : In addition, a map of all SAHA properties including public housing, Beacon, and Partnerships can be found here .
13	Will there be an update once SAHA's proposals are submitted, reviewed and if approved/not approved?	The proposed changes will be presented to the Board of Commissioners on April 6, 2022. If approved, they will then be submitted to HUD on April 15, 2022. By July 2022, SAHA should receive approval from HUD. All approved plans are posted on SAHA's website.

Surveys

A survey titled “We want to hear from you!” was prepared and posted online on February 14, 2022. On February 28, an English and Spanish translated version were sent directly to 11,519 residents and on March 10, 2022 the survey was posted to the Landlord portal and sent to 1,451 landlords. The survey was delivered using an emailed google form and a paper form was provided upon request. In addition, flyers were distributed to public housing resident doors with the link and QR code to complete the survey.

Each question described the policy change and then asked respondents to provide their feedback using a likert scale. The survey communicated that it was anonymous and voluntary. In addition, the survey stated that participation in the survey would not impact the respondent's application status or participation in any SAHA programs. Information in this summary report includes responses received by March 15, 2022.

Delivery and response statistics

Table 3. Response rates by delivery method

Target Population	Sent	Responses	Response (%)
HCV and PH residents with email	11,522	496	4.3%
Landlords with email	1,451	24	1.7%
TOTAL	12,973	520	4.0%

Table 4. Email delivery detail



Result	Resident Emails	Resident Emails (%)	Landlord Emails	Landlord Emails (%)	Total Emails	Total Emails (%)
Bounced	441	3.8%	97	6.7%	538	4.2%
Email Not Opened	6,608	57.4%	675	46.5%	7,283	56.1%
Email Opened	4,473	38.8%	679	46.8%	5,152	39.7%
Survey Link Opened*	633	5.5%	107	7.4%	740	5.7%
	11,522		1,451		12,973	

*Counts reported in “Survey Link Opened” are also included in “Email Opened”.

Table 5. Responses by self-identified SAHA housing program

Self-identified SAHA Housing Program	Responses	Response (%)
Housing Choice Voucher Program	334	67.3%
Public Housing Program	162	32.7%
TOTAL	496	100.0%

Topics

The following topics were covered by the survey:

- Public Housing Policy Changes (ACOP)
- Housing Choice Voucher Policy Changes (ADMIN Plan)
- Family Self-Sufficiency (FSS) Program Action Plan
- MTW Activities

Likert Scale

All responses are rated on a scale from Strongly Oppose (assigned a score of 1) to Strongly Support (assigned a score of 4). The survey allowed respondents to answer “Not Sure”; these responses were not included in response averages; however, the Agency used these responses to inform other work including which policies should be explained in further detail during resident briefings. In this report, colors are assigned to each response value in the following way:

● Average ■ Not Sure ■ Strongly Support ■ Support ■ Oppose ■ Strongly Oppose

Results



A total of 5,848 individual question responses were received across the 520 survey responses. Not all survey responses received had responses for all questions. As a result, each question has a separate total number of responses from which percentages are calculated.

Of the responses received, 68.4% or 4,002 indicated their support for the policy change. Slightly less than one-fifth or 19.4% selected three on the scale indicating the responder either had no opinion or did not know. Responses indicating they did not support the policy change made up 12.2% or 714 responses. The average question response score was 3.1.

Table 6. Summary results for all question responses

Response Category	Responses	Response (%)
1 - Strongly Oppose	342	5.8%
2 - Oppose	372	6.4%
3 - Support	2,500	42.7%
4 - Strongly Support	1,502	25.7%
Not Sure	1,132	19.4%
TOTAL	5,848	100%

In the following tables, the results are displayed by survey question.



PUBLIC HOUSING

Table 7. Public Housing Policy Change Response Count Summary

Question	1 - Strongly Oppose		2 - Somewhat Oppose		3 - Somewhat Support		4 - Strongly Support		Not Sure	
	#	%	#	%	#	%	#	%	#	%
2. 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.	13	8.0%	9	5.6%	57	35.2%	43	26.5%	40	24.7%
3. SAHA is proposing changes to the occupancy standards for determining unit size to include assigning bedrooms for foster children only if they will be in the unit for more than 6 months. Language changes also clarify that all children anticipated to reside in the dwelling will be included in determining unit size with supporting documentation.	7	4.3%	3	1.9%	90	55.6%	47	29.0%	15	9.3%
4. SAHA is proposing to provide former residents with a notice of charges within 30 days from the date of move out in order to align with Texas Property Code. Current SAHA policy provides 10 business days.	5	3.1%	11	6.8%	85	52.5%	41	25.3%	20	12.3%
5. SAHA has clarified language for unit transfer to allow for flexibility when processing transfer requests based on circumstances of the family and unit availability.	1	0.6%	2	1.2%	91	56.2%	51	31.5%	17	10.5%
6. SAHA has added clarifying language to the termination policy that states if the family fails to transfer when the transfer is required by SAHA it will be grounds for termination.	23	14.2%	29	17.9%	60	37.0%	18	11.1%	32	19.8%
7. SAHA is proposing changes to implement the MTW policy that will remove biennial recertifications and	6	3.7%	5	3.1%	67	41.4%	50	30.9%	34	21.0%

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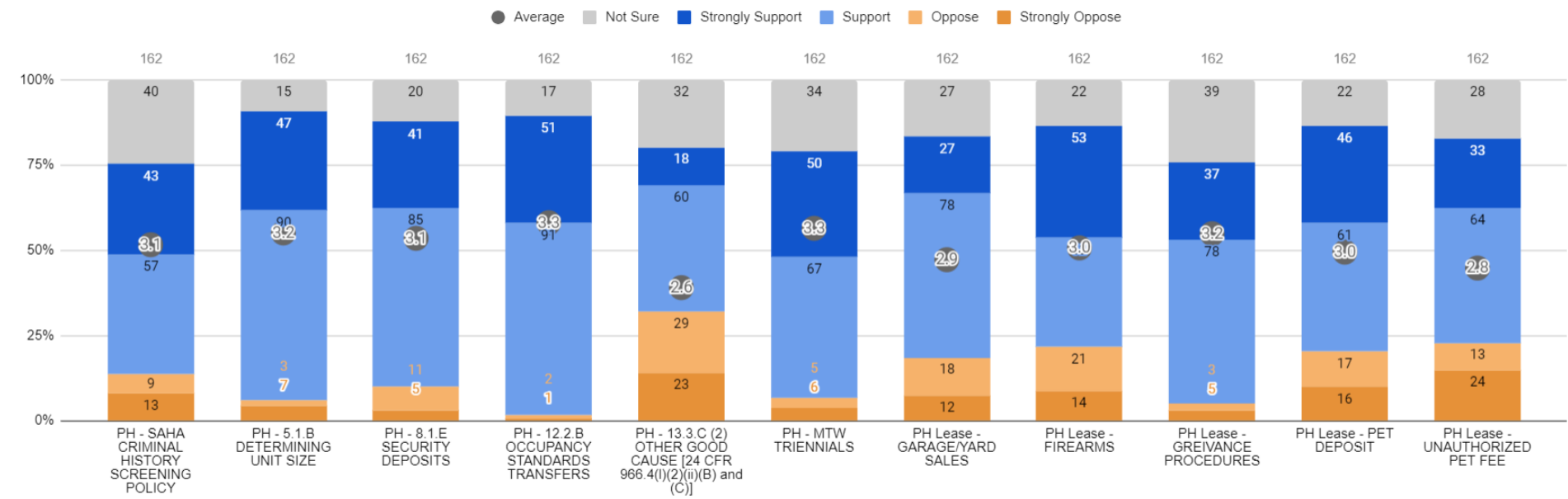
implement triennial recertifications (every three years) for all households.										
TOTAL	55	5.7%	59	6.1%	450	46.3%	250	25.7%	158	16.3%

Table 8. Public Housing Lease Change Response Count Summary

Question	1 - Strongly Oppose		2 - Somewhat Oppose		3 - Somewhat Support		4 - Strongly Support		Not Sure	
	#	%	#	%	#	%	#	%	#	%
8. SAHA is proposing to update language to reflect current policy on garage/yard sales. Current policy states garage/yard sales may be allowed only when sponsored by property management.	12	7.4%	18	11.1%	78	48.1%	27	16.7%	27	16.7%
9. SAHA is proposing to add language to restrict the display or use of legal firearms on SAHA property.	14	8.6%	21	13.0%	52	32.1%	53	32.7%	22	13.6%
10. SAHA has added a section in order to allow residents to settle grievances through an informal conference at their community office rather than scheduling an informal hearing when applicable. The language was changed in subsection III to reflect the request for an informal hearing may be made by a resident in the event they are dissatisfied with the informal conference decision.	5	3.1%	3	1.9%	78	48.1%	37	22.8%	39	24.1%
11. SAHA is proposing language changes to reflect the updated pet deposit amount of \$150.00 and the repayment agreement total sum being \$150.00 by implementing a \$50.00 down payment and (2) \$50.00 monthly payments.	16	9.9%	17	10.5%	61	37.7%	46	28.4%	22	13.6%
12. SAHA is also proposing to update the unauthorized pet fee in order to reflect the updated pet deposit and repayment amount of \$150.00.	24	14.8%	13	8.0%	64	39.5%	33	20.4%	28	17.3%
TOTAL	71	8.8%	72	8.9%	333	41.1%	196	24.2%	138	17.0%



Chart 1. Public Housing Policy and Lease Change Response Summary



HOUSING CHOICE VOUCHER

Table 9. Housing Choice Voucher Policy Change Response Count Summary

Question	1 - Strongly Oppose		2 - Somewhat Oppose		3 - Somewhat Support		4 - Strongly Support		Not Sure	
	#	%	#	%	#	%	#	%	#	%
13. 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.	24	6.7%	32	8.9%	152	42.5%	77	21.5%	73	20.4%
14. In order to move SAHA towards being a more digitally-literate agency, particularly in the era of COVID-19, language was added in 71.B(2)(b) to specify that the agency will accept clear and legible photos or digital scans of original documents.	9	2.5%	9	2.5%	166	46.4%	141	39.4%	33	9.2%
15. SAHA is proposing to remove landlord self-certification for inspections. This change will require SAHA to certify inspection results and reinspect units under HAP contract.	40	11.2%	30	8.4%	131	36.6%	105	29.3%	52	14.5%
16. SAHA is proposing changes to implement the MTW policy that will remove biennial recertifications and implement triennial recertifications (every three years) for all households.	19	5.3%	20	5.6%	139	38.8%	145	40.5%	35	9.8%
17. SAHA is proposing to apply increases in payment standards during processing of any approved request for rental increases in between triennial recertifications.	43	12.0%	57	15.9%	105	29.3%	67	18.7%	86	24.0%



18. SAHA has added language to address the MOD-Rehab Program in the Emergency Transfer Plan. This will allow participants in the MOD-Rehab Program the same protections as other programs under SAHA's Emergency Transfer Plan.	7	2.0%	7	2.0%	182	50.8%	67	18.7%	95	26.5%
19. SAHA has added language to the Move On Program to include additional supportive housing program types including Rapid Rehousing.	6	1.7%	3	0.8%	164	45.8%	121	33.8%	64	17.9%
TOTAL	148	5.9%	158	6.3%	1039	41.5%	723	28.9%	438	17.5%

Chart 2. Housing Choice Voucher Policy Change Response Summary

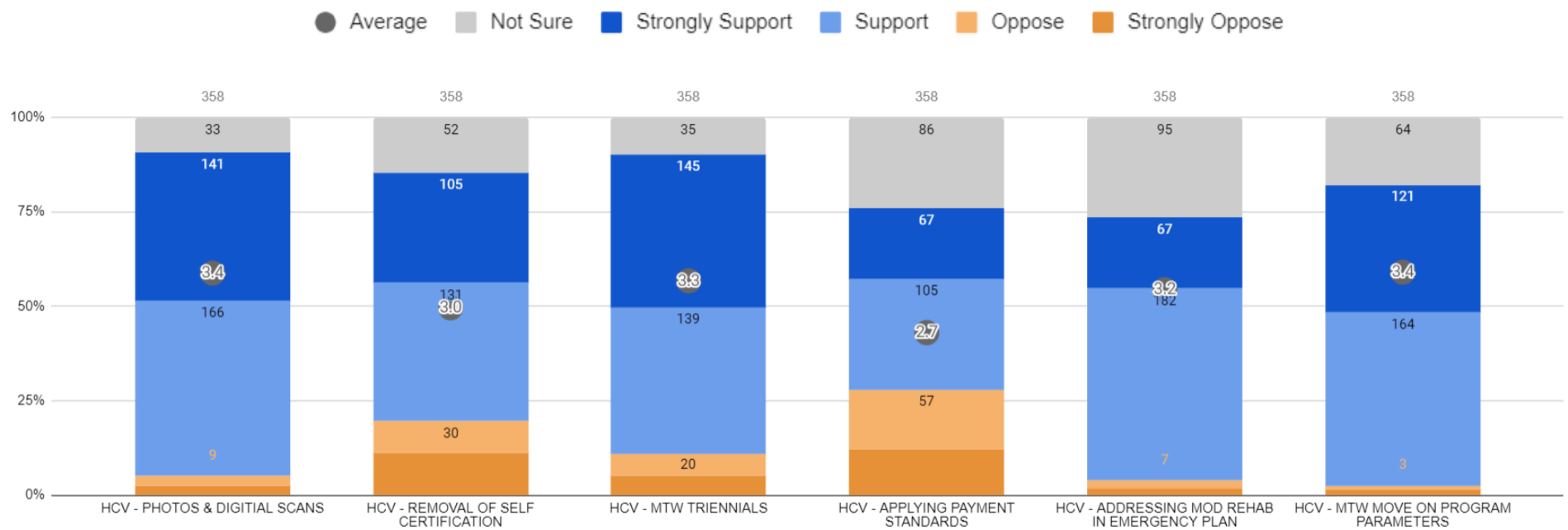


Table 10. Housing Choice Voucher Policy Change Response Count Summary (Landlords Only)

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Question	1 - Strongly Oppose		2 - Oppose		3 - Support		4 - Strongly Support		Not Sure	
	#	%	#	%	#	%	#	%	#	%
13. 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.	3	12.5%	4	16.7	10	41.7%	6	25.0%	1	4.2%
14. In order to move SAHA towards being a more digitally-literate agency, particularly in the era of COVID-19, language was added in 7.1.B(2)(b) to specify that the agency will accept clear and legible photos or digital scans of original documents.	0	0%	2	8.3%	10	41.7%	12	50.0%	0	0%
15. SAHA is proposing to remove landlord self-certification for inspections. This change will require SAHA to certify inspection results and reinspect units under HAP contract.	17	70.9%	5	20.8%	1	4.2%	0	0%	1	4.2%
16. SAHA is proposing changes to implement the MTW policy that will remove biennial recertifications and implement triennial recertifications (every three years) for all households.	0	0%	4	16.7	6	25.0%	13	54.2%	1	4.2%
17. SAHA is proposing to apply increases in payment standards during processing of any approved request for rental increases in between triennial recertifications.	0	0%	1	4.2%	5	20.8%	18	75.0%	0	0%
18. SAHA has added language to address the MOD-Rehab Program in the Emergency Transfer Plan. This will allow participants in the MOD-Rehab Program the same protections as other programs under SAHA's Emergency Transfer Plan.	1	4.2%	0	0%	10	41.7%	2	8.3%	11	45.8%

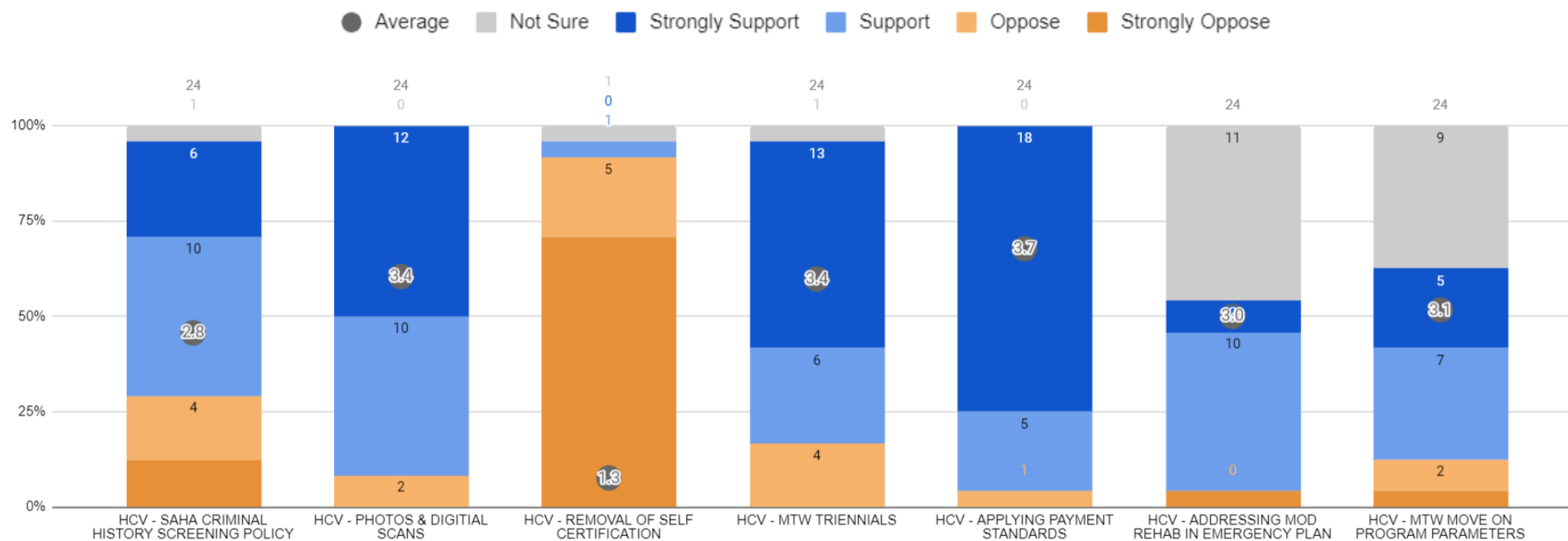
APPENDIX B: HUD Information Reporting Requirements | Public Comment Documentation



19. SAHA has added language to the Move On Program to include additional supportive housing program types including Rapid Rehousing.

	1	4.2%	2	8.3%	7	29.2%	5	20.8%	9	37.5%
TOTAL	22	13.1%	18	10.7%	49	29.2%	56	33.3%	23	13.7%

Chart 4. Housing Choice Voucher Policy Change Response Summary (Landlords Only)



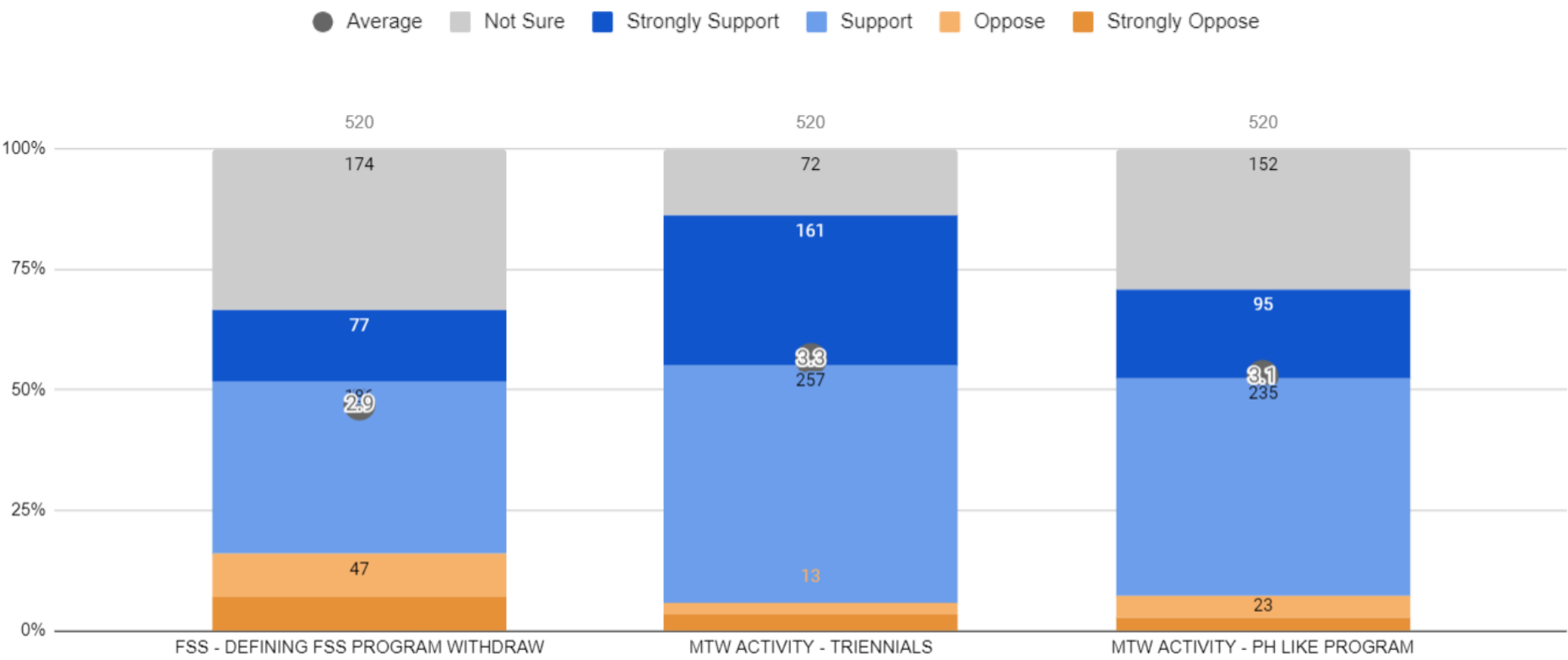
FAMILY SELF-SUFFICIENCY (FSS) ACTION PLAN & MTW ACTIVITIES

Table 10. FSS Action Plan & MTW Activity Policy Change Response Count Summary

Question	1 - Strongly Oppose		2 - Somewhat Oppose		3 - Somewhat Support		4 - Strongly Support		Not Sure	
	#	%	#	%	#	%	#	%	#	%
21. SAHA proposes to add language to specify when a family is considered withdrawn from the FSS program to include: (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. Today, general practice is to wait three months for a response before terminating.	36	6.9%	47	9.0%	186	35.8%	77	14.8%	174	33.5%
22. SAHA is proposing to amend the current schedule for recertifications to once every three years. Currently, only households on a fixed-income are recertified every three years. All other households are certified every two years. Every household will continue to have the option of an interim recertification if there is a change in household composition or income according to HCV and PH policy.	17	3.3%	13	2.5%	257	49.4%	161	31.0%	72	13.8%
23. SAHA proposes to establish a Property-based local, non-traditional rental subsidy program (PH-like program) to support the development of new housing units with income-based rent calculations and more tenant protections similar to those offered by public housing. Families served through this program will pay 30% of their income in rent. SAHA's Proposed Program can be located in Section 3 of the MTW Plan under "FY2023-1: Property-based local, non-traditional rental subsidy program" (pg 17-19).	15	2.9%	23	4.4%	235	45.2%	95	18.3%	152	29.2%
TOTAL	68	4.4%	83	5.3%	678	43.5%	333	21.3%	398	25.5%



Chart 3. FSS Action Plan & MTW Activity Policy Change Response Summary



APPENDIX B.5.: LOBBYING DISCLOSURES



DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input checked="checked" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="checked" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: San Antonio Housing Authority (TX006) 818 S. Flores St. San Antonio, TX 78204 Congressional District, if known:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: 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 <i>(if individual, last name, first name, MI):</i> Not applicable	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> 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.	Signature: _____ Print Name: Ed Hinojosa, Jr. Title: President and CEO Telephone No.: (210) 477-6047 Date: 7/12/22	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

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)

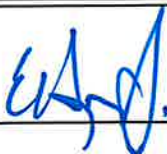
Name of Authorized Official

Ed Hinojosa, Jr

Title

President and CEO

Signature



Date (mm/dd/yyyy)

07/12/2022

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. Any substantial changes to implementation policies are subject to board approval. The Agency's current implementation policies as approved by the Board of Commissioners can be found at the following:

Public Housing

Current ACOP: <https://saha.org/wp-content/uploads/2022/02/FY21-22ACOP.pdf>

Summary of Revisions to

FY2022-23 Admissions & Continued Occupancy Policy

Indicates policy has been added

~~Indicates policy has been removed~~

Reason for the change to 3.3.E SAHA's Criminal History Screening Criteria

Updates have been made to SAHA's Criminal History Screening Criteria Grid in an effort to establish more equitable admissions standards for applicant families.

3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY

SAHA Screening Criteria Grid

Offense Category	Within seven (7) years of offense	Within five (5) years of offense	Within three (3) years of offense
Violent Criminal Activity	<ul style="list-style-type: none"> 1st Degree / 2nd Degree Homicide Manslaughter / Criminally Negligent Homicide 	<ul style="list-style-type: none"> <u>Assault (Misdemeanor)</u> <u>Deadly Conduct (Misdemeanor)</u> Stalking 	<ul style="list-style-type: none"> Assault by Contact Crimes against Animals



	<ul style="list-style-type: none"> Assault /Battery (Felony) <u>Aggravated Assault</u> Robbery (All Types), including Aggravated Robbery 1st Degree Felony Injury to a <u>Child</u>, Elderly or Disabled Individual Sexual Assault / Sex Offenses Deadly Conduct <u>(Felony)</u> Weapons Offense (Against Person) Kidnapping, Abduction, and Unlawful Restraint Family Violence/Domestic Violence 	<ul style="list-style-type: none"> Harassment Crimes involving Terrorism / Terroristic Threat 	
Drug-Related Criminal Activity	<ul style="list-style-type: none"> Drug Offense (Manufacture, Distribution, or Possession with Intent to Distribute) 	<ul style="list-style-type: none"> Driving under the Influence - If two (2) or more convictions Drug Offense (Possession) (If two or more felony convictions) 	<ul style="list-style-type: none"> Driving under the Influence / <u>Driving while Intoxicated</u>, 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** <u>Currently using Drugs / History of</u>
Other*	<ul style="list-style-type: none"> <u>Abandoning or Endangering Child</u> Arson-related Human Trafficking / <u>Human Smuggling</u> 	<ul style="list-style-type: none"> Fraud Burglary/Breaking and Entering (Felony Only) Criminal Mischief / Damage / Property Vandalism (Felony Only) Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (If two or more convictions) 	<ul style="list-style-type: none"> Trespassing Theft/Stolen Property (if 2 <u>felony</u> convictions or more) Weapons related (other than use of weapons against person) <u>Unlawful Carrying of a Weapon</u> Prostitution (Felony Only) Solicitation Destruction of Property Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more

APPENDIX C: PROPOSED HOUSING PROGRAM IMPLEMENTATION POLICY CHANGES



			convictions)
<p>*Other is defined as the following:</p> <ul style="list-style-type: none"> • 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). <p>**HUD requires SAHA to deny assistance if any household member is currently engaged in the use of illegal drugs. SAHA defines <i>currently engaged in</i> as any use of illegal drugs during the previous six months.</p>			

Reason for change to 5.1.B Determining Unit Size

This section was changed in order to align with the existing policy in the Housing Choice Voucher Program located in 5.2.B of the FY20-21 Administrative Plan.

5.1.B DETERMINING UNIT SIZE

- (4) SAHA's occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

- (b) SAHA will assign one (1) bedroom for each two (2) persons within the household, except in the following circumstances:

- (v) Foster children will be included in determining unit size only if they will be in the unit for more than 6 months.
- (vi) ~~An unborn child will not be counted in determining unit size.~~ All children anticipated to reside in a dwelling unit will be included in determining unit size upon submission of supporting documentation. For example children expected to be born to pregnant women or children whose custody is being obtained by an adult.
- (vii) Adopted children will be included in determining unit size when the family submits supporting documentation.



~~(vii)-(viii)~~ Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.

Reason for change to 8.1.E Security Deposits

This section was changed to provide the former resident with notice of charges within 30 days from the date of move out in order to align with Texas Property Code.

8.1.E SECURITY DEPOSITS [24 CFR 966.4(b)(5)]

- (4) Subject to applicable laws, interest earned on security deposits may be refunded to the tenant after vacating the unit, or used for tenant services or activities.

- (f) SAHA will provide the resident with a written list of any charges against the security deposit within ~~10-business~~ 30 days of the move-out inspection. The notice will be sent to the resident's last known address. If the resident disagrees with the amount charged, SAHA will provide a meeting to discuss the charges.
- (g) SAHA will provide the resident with a written statement, which lists all charges made against the security deposit and any amounts still owed, if applicable, within ~~ten (10)-business~~ thirty (30) days of the move-out inspection. The statement will be sent to the resident's last known address in accordance with adverse action requirements under the SAHA Grievance Procedure. If the resident disagrees with the amount charged, the resident may dispute the charges through the grievance process.

Reason for change to 9.1.C, 9.1.E and 9.2.B

Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.



9.1.C SCHEDULING ANNUAL REEXAMINATIONS

- (1) SAHA must establish a policy to ensure that the annual reexamination for each family paying an income-based rent is completed within a 12-month period [24 CFR 960.257(a)(1)].

(c) **Triennial Recertifications**

SAHA will conduct a recertification of household income and family composition every three years. ~~if the household meets the following criteria:~~

~~(i) The household has at least one (1) elderly or disabled member, and~~

~~(ii) The household receives 100% of their income from fixed income sources:~~

~~(A) SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.~~

~~This policy is effective September 1, 2018 for all new admissions and effective November 1, 2018 for all recertifications.~~

~~(d) **Biennial Recertifications**~~

~~For all other households not meeting the criteria for triennial recertifications, SAHA will conduct a recertification of household income and family composition every two years.~~

9.1.E FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253]

(2) **Family Choice in Rents [24 CFR 960.253(a) and (e)]**

- (a) Once each year, SAHA must offer families the choice between a flat rent and an income-based rent. The family may not be offered this choice more than once a year. SAHA must document that flat rents were offered to families under the methods used to determine flat rents for SAHA.

- (i) SAHA will offer a family the choice between flat and income-based rent upon admission and upon each subsequent ~~biennial~~ triennial reexamination.



9.2.B FULL REEXAMINATION OF FAMILY INCOME AND COMPOSITION

(1) Frequency of Reexamination

- (a) For families paying flat rents, SAHA will conduct a full reexamination of family income and composition in accordance with the ~~biennial and~~ triennial reexamination policy (see section 9.1.C).

Reason for change to 12.2.B Types Of Saha Required Transfers

Language was changed to allow for flexibility when processing transfer requests based on the circumstances of the family and unit availability. This aligns with HUD policy on unit transfers.

(6) OCCUPANCY STANDARDS TRANSFERS - ADMINISTRATIVE CATEGORY 1

- (d) Based on SAHA occupancy standards, SAHA ~~will~~ may process a transfer request and move the family when a unit that meets the needs of the family is available.

Reason for change to 13.3.C Other Authorized Reasons For Termination

Language was changed to align with the revision noted above, this was done to clarify that SAHA will not terminate the lease if the transfer is not required.

13.3.C OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(l)(2) and (5)(ii)(B)]

(2) Other Good Cause [24 CFR 966.4(l)(2)(ii)(B) and (C)]



SAHA will terminate the lease for the following reasons:

- (vi) Failure to transfer to an appropriate size dwelling unit based on family composition, when required by SAHA and upon appropriate notice ~~by SAHA that~~ when such a dwelling unit is available.



Voucher Programs

Current Admin Plan: <https://saha.org/wp-content/uploads/2022/01/FY21-22AdministrativePlan.pdf>

Summary of Revisions to FY 2022 - 2023 Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

FY22-23 SAHA CHR Screening Criteria Grid Policy Update

Updates have been made to SAHA's Criminal History Screening Criteria Grid in an effort to establish more equitable admissions standards for applicant families.

3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY

SAHA Screening Criteria Grid

Offense Category	Within seven (7) years of offense	Within five (5) years of offense	Within three (3) years of offense
Violent Criminal Activity	<ul style="list-style-type: none">1st Degree / 2nd Degree HomicideManslaughter / Criminally Negligent HomicideAssault /Battery (Felony)<u>Aggravated Assault</u>Robbery (All Types), including Aggravated Robbery1st Degree Felony Injury to a <u>Child</u>, Elderly or Disabled IndividualSexual Assault / Sex Offenses	<ul style="list-style-type: none"><u>Assault (Misdemeanor)</u><u>Deadly Conduct (Misdemeanor)</u>StalkingHarassmentCrimes involving Terrorism / Terroristic Threat	<ul style="list-style-type: none">Assault by ContactCrimes against Animals

APPENDIX C: PROPOSED HOUSING PROGRAM IMPLEMENTATION POLICY CHANGES



	<ul style="list-style-type: none"> Deadly Conduct (<u>Felony</u>) Weapons Offense (Against Person) Kidnapping, Abduction, and Unlawful Restraint Family Violence/Domestic Violence 		
Drug-Related Criminal Activity	<ul style="list-style-type: none"> Drug Offense (Manufacture, Distribution, or Possession with Intent to Distribute) 	<ul style="list-style-type: none"> Driving under the Influence – If two (2) or more convictions Drug Offense (Possession) (If two or more felony convictions) 	<ul style="list-style-type: none"> Driving under the Influence / <u>Driving while Intoxicated</u> – 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** <u>Currently using Drugs / History of</u>
Other*	<ul style="list-style-type: none"> <u>Abandoning or Endangering Child</u> Arson-related Human Trafficking / <u>Human Smuggling</u> 	<ul style="list-style-type: none"> Fraud Burglary/Breaking and Entering (Felony Only) Criminal Mischief / Damage / Property Vandalism (Felony Only) Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (If two or more convictions) 	<ul style="list-style-type: none"> Trespassing Theft/Stolen Property (if 2 <u>felony</u> convictions or more) Weapons-related (other than use of weapons against person) <u>Unlawful Carrying of a Weapon</u> Prostitution (Felony Only) Solicitation Destruction of Property Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)

*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).

**HUD requires SAHA to deny assistance if any household member is currently engaged in the use of illegal drugs. SAHA defines *currently engaged in* as any use of illegal drugs during the previous six months.

APPENDIX C: PROPOSED HOUSING PROGRAM IMPLEMENTATION POLICY CHANGES



Application of Payment Standards Between Recertifications

Reason for update to 6.3.C “Applying Payment Standards [24 Cfr 982.505; 982.506(B)]”:

Language was added to clarify the application of increased payment standards in between recertifications.

(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.

Photos and Digital Scans of Original Verification Documents

Reason for update to 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 in 7.1.B(2)(b) to specify that the agency will accept clear and legible photos or digital scans of original documents.

7.1 GENERAL VERIFICATION REQUIREMENTS

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.



Removing Landlord Self Certification for Inspections

Reason for update to 8.2.F “Inspection Results and Reinspections for Units Under HAP Contract”:

Language was removed from 8.2.F(3) and 8.2.F(4) since SAHA will no longer permit landlords to self certify Housing Quality Standards (HQS) inspections. 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 aware of the items that have or have not been repaired, and sometimes signs the self certification without repairs being completed.

8.2 THE INSPECTION PROCESS

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.~~
- ~~(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.~~

(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.~~

Biennial Recertifications for all Assisted Families

Reason for update to 11.1.C “Scheduling Annual Reexaminations”:

Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.

- (1) SAHA must establish a policy to ensure that the annual reexamination for each family is completed within a 12-month period, and may require reexaminations more frequently [HCV GB p. 12-1].

(e) Triennial Recertifications

SAHA will conduct a recertification of household income and family composition every three years ~~if the household meets the following criteria:~~

- ~~(i) The household has at least one (1) elderly and/or disabled member, and~~
- ~~(ii) The household receives 100% of their income from fixed income sources:~~
- ~~(A) SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.~~

(f) Biennial Recertifications



~~For participant households not meeting the requirements of the triennial recertification cycle, SAHA will conduct a recertification of household income and family composition every two years.~~

Addressing MOD Rehab Program in Emergency Transfer Plan

Reason for update to Exhibit 16-2: “SAHA Emergency Transfer Plan”:

Language was added to Exhibit 16-2 Part 4 Section 5: Emergency Transfer Timing and Availability.

EXHIBIT 16-2: SAHA EMERGENCY TRANSFER PLAN

Part 4: Emergency Transfer Timing and Availability

(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.

Adjusting Program Parameters for Move On Program [MTW Activity]

APPENDIX C: PROPOSED HOUSING PROGRAM IMPLEMENTATION POLICY CHANGES



Reason for update to 19.4.A “Move On Program Overview”:

Language was added in 19.4.A(1) for a general category of "other supportive housing" to continue to communicate the flexibility we have 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].



APPENDIX D: PROPOSED FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

Appendix D contains the Agency's implementation policies for the Family Self-Sufficiency Program.

Family Self-Sufficiency Program

Current FSS Action Plan: <https://saha.org/wp-content/uploads/2021/07/FSSActionPlan2022.pdf>

Summary of Revisions to FY2022-23 Family Self-Sufficiency (FSS) Action Plan

Indicates policy has been added

~~Indicates policy has been removed~~

About this Revision Summary

The proposed FY22-23 FSS Action Plan includes minor updates in accordance with federal regulations and recommendations by the U.S. Department of Housing and Urban Development (HUD.)

The proposed FY22-23 FSS Action Plan does not include substantive or material changes to current FSS Program administration or policies. Please note that all included SAHA language is in red, underlined text, which is subject to changes resulting from public comment. The complete document is available on the SAHA website for review and for public comment.

Overview of the FY21-22 FSS Action Plan

Language was updated within the proposed Action Plan in the following chapters:

- Chapter 1: Overview of the Program and Plan
- Chapter 5: Contract of Participation

These updates have been made to provide accuracy and greater clarity to FSS program staff and participants.



Reason for the Change to Exhibit 1-1: HUD-Approved SAHA MTW Activities

Activity FY2014-2 has been closed out and removed from the table in Exhibit 1-1.

EXHIBIT 1-1: HUD-APPROVED SAHA MTW ACTIVITIES

The following is a complete list of SAHA's applicable MTW activities that have been approved by HUD:

Activity	Title	Description
FY2014-2	Early Engagement	Requires applicants to complete a defined set of courses upon admission to the program. Elderly and disabled heads of household are exempt from this requirement.
FY2019-2	Alternate Recertification Process	SAHA conducts biennial reexaminations for all non-elderly/non-disabled participant households, and triennial reexaminations for elderly or disabled households receiving 100% of their income from fixed sources. Consolidates and updates FY2014-4 and FY2016-2.
FY2020-3	Family Self-Sufficiency (FSS) Program Streamlining	Modifies FSS contract to be consistent with future alternative rent policies like the FY2014-6 Rent Simplification MTW activity. Eliminates the 120-day rule requiring an interim or annual recertification if one has not been conducted within 120 days of FSS enrollment.

***Subject to change as determined by MTW Plan revision and HUD approval.**

Reason for the Change to 5.2.F Termination of the Contract

This section includes an overview of reasons and cause for termination of the contract. This section did not include a definition of withdrawal from the FSS program, which is needed to ensure FSS program participants have a full understanding of withdrawal from the FSS program.

5.2.F. TERMINATION OF THE CONTRACT

- (1) The COP may be terminated before the expiration of the contract term and any extension of the contract by the following [24 CFR 984.303(h)]:
 - (a) Mutual consent of the parties;



(b) Failure of the FSS family to meet its obligations under the COP without good cause, including in an HCV FSS Program the failure to comply with the contract requirements because the family has moved outside the jurisdiction of SAHA;

(c) The family's withdrawal from the FSS Program;

(1) A family is considered withdrawn when:

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.

(d) Such other act as is deemed inconsistent with the purpose of the FSS Program; or

(e) Operation of law.



APPENDIX E: ASSET MANAGEMENT PLAN

The Asset Management Plan outlines how the Agency plans to make best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy and supporting the Agency's 2025 Strategic Plan.

The Asset Management Plan generally covers the five-year period spanning from FY 2022-23 to FY 2026-27. In addition to updating the five-year plan every year, the Agency also may make adjustments to respond to business needs.

To that end, the Agency may consider unique, opportunistic, and unscheduled acquisitions, dispositions, and/or new development projects that are not included in this plan, but are supportive of the Agency's 2025 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.

The Asset Management Plan encompasses preservation activities in the Low Income Public Housing and Beacon Communities housing portfolios as well as real estate development activity. The plan is organized as follows:

1. **Housing Preservation: Capital Improvement Plans**
Details the Agency's plans to preserve affordable housing units through capital improvement plans for the Low Income Public Housing and Beacon Communities portfolios.
2. **Housing Expansion: New Housing Development Plans**
Details the Agency's development plans for real estate assets currently or anticipated to be owned by the San Antonio Housing Authority or its affiliates.
3. **Acquisitions: Asset Acquisition Plans**
Details the Agency's plans to acquire real estate assets to be owned by the San Antonio Housing Authority or its affiliates.
4. **Dispositions: Asset Disposition Plans**
Details the Agency's plans to dispose of real estate assets currently owned by the San Antonio Housing Authority or its affiliates.
5. **Other Real Estate Holdings**
Provides a listing of the Agency's real estate assets that do not currently have development or acquisitions plans.



1. Housing Preservation: Capital Improvement Plans

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

A. Public Housing Five Year Capital Improvement Plan

Over the next five (5) years, the Agency plans to invest approximately \$24 million in capital repairs to extend the useful life at 37 properties and approximately 4,314 housing units. Projected funding for capital improvements is based on historical grants and forecasted capital fund appropriations by HUD. As a result, the five-year plan is a rolling plan and updated every year or as additional needs and funding amounts become available.

The table below outlines current property-specific preservation plans in addition to the five-year capital improvement plan (FY 2023 - FY 2027). In addition to the plan below, the agency is in the process of producing cost estimates for elevator modernizations and generators at various public housing developments. A detailed modernization plan outlining the public housing properties and cost estimates will be added to the Capital Five Year Improvement Plan accordingly.

Fiscal Year (FY)¹ Capital Fund Grant Year (CFP)	Property	Units Preserved²	Description	Planned Investment (\$)³
FY 2021-22 CFP20 (Current)	Apache	501	Redevelopment / Foundation	27,500
	Blanco	100	Generator Modernization	78,000
	Cheryl West	82	Roof Replacement	684,000
	College Park	78	Elevator Design and Replacement	300,000
	Cross Creek	66	Parking Lot Survey / Repairs	310,000
	Christ the King	48	Elevator Design and Replacement	147,000
	Escondida	20	Elevator Design and Replacement	126,000
	Frank Hornsby	59	Elevator Design and Replacement	260,000
	Kenwood North	53	Cylinder Replacement	72,000
	Lewis Chatham	119	Generator System Design	25,000
	Lincoln Heights	338	Security Cameras	65,000
	Lincoln Heights	338	Architectural Barrier	4,500
	Lincoln Heights	338	Lead Based Paint Project	3,209,735

¹ SAHA fiscal years run from July 1 to June 30th. For example, FY2022 begins on July 1, 2021 and ends on June 30, 2022. Capital Fund Grants are awarded to SAHA every year. SAHA then allocates funds based on capital needs.

² Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non-strategic assets and net loan proceeds from refinances (Beacon)). Includes major capital items that impact or extend the useful life expectancy of the asset, major systems, or site components (ex. foundations, building envelope (siding, windows, doors, roofs), HVAC systems, water/sewer, electrical, paving, lighting, major interior upgrades to units and common areas. For example, if three roofs are replaced, only units in those buildings will be counted as preserved. However, if the project impacts all units, ex foundation repair or sewer line repairs, all units will be counted as preserved.

³ Funding sources may be a combination of CFP, MTW, Cares Act, sale net proceeds and insurance proceeds.



CFP21 (Current)	Mission Park	100	Lead Based Paint Project	951,050
	Park Square	26	Roof Replacement	20,000
	Pin Oak I	50	Elevator Design and Replacement	127,000
	Riverside	74	Lead Based Paint Project	700,270
	San Pedro Arms	16	Elevator Design and Replacement	145,000
	San Pedro Arms	16	Generator Modernization	57,000
	Victoria Plaza	185	Security Entry Access, Camera, Alarm	57,000
	W.C. White	75	Generator System Design	25,000
	William Sinkin	50	Foundation Repairs	25,000
		2732		7,416,055
	Cassiano	499	Foundation Repairs	200,000
	Highview	68	Storm Drainage	161,200
	Mirasol Homes	174	Roof Repairs/Replacement	1,209,800
	South San Apts.	30	Drainage Repairs	161,200
	Villa Tranchese	201	Exterior Balcony Repairs	1,750,000
	Villa Veramendi	166	Roof Repairs/Replacement	950,000
		1138		4,432,200
FY 2022-23 CFP22	Francis Furey	66	Substantial renovation	2,500,000
		66		2,500,000
FY 2023-24 CFP23	Le Chalet	34	Substantial renovation	1,500,000
	Morris Beldon	35	Substantial renovation	912,000
		69		2,412,000
FY 2024-25 CFP24	College Park	78	Substantial renovation	800,000
	Kenwood North	53	Substantial renovation	930,000
	Midway	20	Substantial renovation	700,000
		151		2,430,000
FY 2025-26 CFP25	Olive Park	26	Substantial renovation	1,800,000
	Linda Lou	10	Substantial renovation	200,000
	Matt Garcia	55	Substantial renovation	650,000
		91		2,650,000
FY 2026-27 CFP26	Escondida	20	Substantial renovation	200,000
	Glen Park	26	Substantial renovation	950,000
	Park Square	26	Substantial renovation	990,000
	Pin Oak II	22	Substantial renovation	151,000
	Village East	24	Substantial renovation	1,425,000
	Williamsburg	15	Substantial renovation	657,400
		133		4,373,400
GRAND TOTAL		4,314		23,713,655

APPENDIX E: Asset Management Plan



MOVING TO WORK PLAN FY 2022-2023

B. Energy Performance Contract (EPC):

An EPC is a HUD approved program, which allows a Public Housing Authority to finance energy and water conservation measures and capital improvements through future utility cost savings.

The San Antonio Housing Authority (SAHA) and its Board of Commissioners elected and approved the process to begin the pre-development phase of a U.S. Housing and Urban Development (HUD) approved EPC where SAHA will spend pre-development funds associated with technical assistance services including, but not limited to engineering, legal, consultants, and other services necessary to achieve project financing and HUD approval. Upon financial closing of the EPC transaction, HUD EPC regulations allow SAHA to be reimbursed for expenditures associated with pre-development services.

SAHA's EPC is estimated to generate about \$16.5 million of utility savings, over a fifteen year term, with a net present value of \$8.3 million in project funds, which will be sourced through an anticipated tax exempt municipal lease purchase agreement. 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.

SAHA's EPC includes high efficient lighting, high efficient plumbing fixtures, solar panels, roofs, windows, HVAC plant upgrades, and bathroom exhaust fans across 34 public housing developments (various building types) equating to 2,324 dwelling units. The project is planned for completion in FY22.

C. Beacon Communities Five Year Capital Improvement Plan

In the coming years, the Agency plans to invest approximately \$22 million in capital repairs to extend the useful life at 30 properties and approximately 4,181 units in the Beacon Communities portfolio. In addition, this portfolio will be expanded as properties in the Agency's Partnership portfolio come to the end of their 15-year affordability period and transition ownership to SAHA. As a result of these property transitions, the capital plan is expected to change to include these new properties.

Projected funding for capital improvements in the Beacon Communities portfolio is based on operating funds, new or refinanced debt on the property, or insurance proceeds where applicable. The tables below outline current property-specific preservation plans.



Fiscal Year⁴	Property	Units Preserved⁵	Description	Planned Investment (\$)
2022-2023	Courtland Heights	56	Pool decking, site work, landscape, covered parking and retaining wall repair/replacement	130,000
	Dietrich Rd	30	Shore up patios, replace damaged siding, parking lots improvements, landscaping and comprehensive roof replacement	315,000
	Pecan Hill	100	Foundation repairs (based on movement study), roof replacement, stucco wall support eval and comprehensive repair, add HVAC, elevator shaft repair and car rehab, parking lots repave and stripe	3,000,000
	Reagan West	15	Roof/Driveway	100,000
	Villa de San Alfonso	29	Paint trim and railings, update community room, elevator maintenance	30,000
	Woodhill	532	Replace siding and windows	3,900,000
		762	TOTAL	7,475,000
2023-2024	Burning Tree	108	Comprehensive rehab, fencing, pool	2,000,000
	Converse Ranch I	124	Drainage repairs (Berin/Swale), restripe parking	20,000
	Cottage Creek I	253	Electrical wall packs/cameras/utility room repairs, parking lots/sidewalk repairs, update fencing, pool resurfacing	425,000
	Cottage Creek II	196	Parking lots/sidewalk repairs, update fencing, pool resurfacing	175,000
	Homestead	157	Property rehab	3,000,000
	Monterrey Park	200	Foundation repairs	500,000
	Towering Oaks	128	Restripe parking lots and replace retaining wall	45,000
	Villa de	104	HVAC replacement, rehab including boilers,	2,300,000

⁴ SAHA fiscal years run from July 1 to June 30th. For example, FY2022 begins on July 1, 2021 and ends on June 30, 2022.

⁵ Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non strategic assets and net loan proceeds from refinances (Beacon)). Includes major capital items that impact or extend the useful life expectancy of the asset, major systems, or site components (ex. foundations, building envelope (siding, windows, doors, roofs), HVAC systems, water/sewer, electrical, paving, lighting, major interior upgrades to units and common areas. For example, if three roofs are replaced, only units in those buildings will be counted as preserved. However, if the project impacts all units, ex foundation repair or sewer line repairs, all units will be counted as preserved.

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	Valencia		fencing, retaining walls, pool, and ext paint	
		1,270	TOTAL	8,465,000
2024-2025				
	Bella Claire	67	Parking lots improvements - Patch-Seal-Stripe, fencing, signage	15,000
	Crown Meadows	192	Fencing, parking lots, paint exterior, pool	40,000
	Sunshine	100	Parking lots	30,000
	San Juan II	144	Parking lots, fencing, security, roofs	800,000
	San Juan I	143	Parking lots, fencing, security, roofs	800,000
	Encanta Villa	56	Playground updates, signage	15,000
		702	TOTAL	1,700,000
2025-2026				
	Rosemont at Highland	252	Paint and repair stucco, paint and update fencing, parking lots and roofs	900,000
	Costa Valencia	230	Roofs, paint exterior, parking lots, fencing	800,000
	Alhambra	140	Paint trim and railings, update community room, elevator maintenance	50,000
	Churchill	40	Fencing and restripe parking lots	45,000
	Castle Point	220	220	110,000
		882	TOTAL	1,905,000
2026-2027				
	San Alfonso	29	Parking, fencing, and signage	55,000
	Courtland	56	Paint exterior, parking lots, trees, and paint railings	450,000
	Refugio	210	Fencing, parking lots, exterior, roofs	2,000,000
	O'Connor	150	Fencing, paint trim, and railings	165,000
	Science Park	120	Fencing, paint trim, and railings	165,000
		565	TOTAL	2,835,000
GRAND TOTAL		4,181		22,380,000

2. Housing Expansion

A. New Housing Development Plans

The San Antonio Housing Authority's mission is centered around bringing housing solutions to the residents of San Antonio. Opportunity housing is ensuring affordable housing options are available to any resident who cannot afford renting at market rate.

The agency is pursuing more than \$1 billion in prospective housing developments to add approximately 6,000 units to the rental market.



Information on development projects summarized below is current as of the drafting of this plan. Development plans may change and all are subject to funding and separate committee and full Board approvals at various points in the development process. Updated information on development projects is available through public notices accessible here:

<https://saha.org/business/about-saha/public-notices/>

Financing Closed (under Construction)														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
1604 Lofts	D2	NRP	4% Tax Credits & Bonds	Closed	\$56,663,651	324	0	33	0	0	224	0	67	0
Aspire at Tampico ¹²	D5	Mission	4% Tax Credits & DG Bonds	Closed	\$34,115,710	200	0	9	10	18	70	20	9	64
Trader Flats (The Scott)	D4	NRP	4% Tax Credits & Bonds	Closed	\$55,753,169	324	0	33	0	0	224	0	67	0
Artisan at Ruiz	D1	Franklin	9% Tax Credits	Closed	\$21,165,791	102	0	11	0	41	50	0	0	0
Majestic Ranch ²	D7	Hogan	4% Tax Credits & Bonds	Closed	\$46,084,260	288	0	0	0	0	288	0	0	0
Culebra Crossing	D6	Lynd	HUD 221(d)(4)	Closed	\$50,123,889	327	0	0	0	0	0	0	164	163
Mira Vista ¹	D7	Hogan	4% Tax Credits & Bonds	Closed	\$45,917,596	312	0	0	0	0	312	0	0	0
Kitty Hawk Flats	Converse	NRP	4% Tax Credits & Bonds	Closed	\$40,611,848	212	0	22	0	0	135	55	0	0
Legacy at Alazan ¹²	D5	NRP	9% Tax Credits	Closed	\$19,155,261	88	40	0	0	0	40	0	0	8
100 Labor ¹²	D1	Franklin	HUD 221(d)(4)	Closed	\$52,438,321	213	0	27	0	17	0	0	0	169
Watson Road (Frontera Crossing Apartments)	D4	NRP	4% Tax Credits & Bonds	Closed	\$60,567,278	348	0	0	18	18	294	18	0	0
Copernicus (Seven07 Lofts)	D2	NRP	4% Tax Credits & Bonds	Closed	\$55,389,378	318	0	0	17	17	267	17	0	0
Vista at Interpark	D9	Atlantic Pacific Comm.	9% Tax Credits	Closed	\$18,290,733	64	0	7	0	16	41	0	0	0

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Vista at Everest	D1	Atlantic Pacific Comm.	9% Tax Credits	Closed	\$18,109,812	64	0	7	0	16	41	0	0	0
Bristol at Somerset ²	D4	Louis Poppoon Development Consulting	4% Tax Credit & Bonds	Closed	\$59,554,244	348	0	0	0	0	348	0	0	0
Horizon Pointe	D2	Integrated Realty Group	4% Tax Credits & Bonds	Closed	\$65,639,352	312	0	20	35	106	0	151	0	0
Josephine	D1	Lynd	Conventional Loan	Closed	\$61,339,167	259	0	0	0	0	26	0	104	129
Total					\$760,919,460	4103	40	169	80	249	2360	261	411	533

Board Provided Final Approval														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Potranco	D4	Lynd	Conventional Loan	Pending	\$50,945,546	360	0	0	0	0	36	0	144	180
Total					\$50,945,546	360	0	0	0	0	36	0	144	180

Board Approved Bond Inducement														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Artisan at Springview ¹²	D2	Franklin	4% Tax Credits & Bonds	Pending	\$63,288,329	325	65	0	0	8	181	53	18	0
Palo Alto	D4	Streamline	4% Tax Credits & Bonds	Pending	\$67,108,532	336	0	16	16	32	244	28	0	0
Victoria Commons - North Pond ¹	D1	Catellus	TBD	Pending	TBD	TBD	0	TBD		TBD	TBD		TBD	TBD
Total					\$130,396,861	661	65	16	16	40	425	81	18	0

Board Approved the Developer														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Victoria Commons - South Pond ¹	D1	Catellus	TBD	Pending	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

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Victoria Commons - Townhomes ¹	D1	Catellus	TBD	Pending	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Snowden Road ^{1,2}	D7	SAHA	9% Tax Credits	Pending	\$25,723,890	135	54	14	0	26	41	0	0	0
Fiesta Trails ²	D8	NRP	9% Tax Credits	Pending	\$19,723,244	60	0	6	0	24	30	0	0	0
Total					\$45,447,134	195	54	20	0	50	71	0	0	0

Pending Board Consideration														
Project Name	District	Developer	Financing	Est Closing Date	Total Development Cost	Total Units	Public Housing Units	Income Unit Mix						
								30%	40%	50%	60%	70%	80%	Market
Alazan Courts ^{1,2}	D5	TBD	TBD	Pending Board Consideration	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Vista at Silver Oaks	D9	Atlantic Pacific Comm.	9% Tax Credits	Pending Board Consideration	\$24,183,539	76	0	8	0	23	45	0	0	0
Total					\$24,183,539	76	0	8	0	23	45	0	0	0

Grand Total					\$1,011,892,540	5,395	159	213	96	362	2,937	342	573	713
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¹SAHA owned land

²Planned use of MTW funds as of the production of this plan. Subject to change.

ALAZAN COURTS REDEVELOPMENT PLAN

The Agency has procured a consultant to begin the master planning of the redevelopment of 501 public housing units at Alazan Courts. The original plan was to demolish the Alazan buildings in two phases. While the Agency still plans to redevelop Alazan a decision has been made to step back from the original two-phased approach and evaluate alternatives that would alleviate economic hardship and stress for existing residents as a result of a relocation. Alternatives will likely include developing more slowly, allowing for more phases to prevent displacement of residents, and to maintain or increase the number of public housing units.

In anticipation of the demolition and/or comprehensive rehab, SAHA has already begun construction on three developments within the west side community in order to utilize those units for relocation of residents that wish to stay in the neighborhood. These three sites are Artisan at Ruiz (102 multi-family units), Alazan Lofts (88 multi-family units) which is located directly adjacent to the Alazan courts, and Tampico Apartments (200 multi-family units). SAHA proposes utilizing MTW funds to cover relocation costs and will also be seeking Tenant Protection Vouchers (TPV) to assist with the relocation.

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B. Other Expansion

During the plan year, the agency expects to evaluate possible investment and/or acquisition of existing Low Income Housing Tax Credit (LIHTC) that are at or approaching the end of the initial 15 year compliance period. This may include properties where a SAHA related entity already holds an ownership interest in the asset, or has no ownership interest in the asset. The Agency may elect to invest MTW funds in accordance with the Agency's broader use of MTW funds authority and in compliance with PIH-2011-45. Any investment is also subject to board approval. Listed below, are properties that are either at or approaching the fifteenth year where the Agency might use MTW funds either as part of the acquisition or at the time the tax credits are re-syndicated:

1. Rosemont at University Park
2. Rosemont at Bethel Place
3. San Juan Square I
4. San Juan Square II
5. Costa Mirada
6. Elan Gardens
7. Midcrowne Senior Pavilion
8. The Ravello
9. Alhambra
10. Artisan at Mission Creek
11. Artisan at Salado Falls
12. Tigoni Villas

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.

Plan	Property ID	Property Address
Post Auction/RTC/Former Lease-Purchase Portfolio Disposition	314106	7250 GLEN MIST
	441311	1071 POINSETTIA ST
	115411	1411 MONTANA
Vacant Land (Rex Site)	109402, 109403	550 BROOKLYN

4. Acquisitions: Asset Acquisition Plans

The Agency has no active acquisition plans, but did complete one unplanned acquisition in FY2021.



5. Other Real Estate Holdings

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

Property IDs	PROPERTY ADDRESS
409213, 409067, 409083, 409198	3940 SAN FERNANDO
124452	1706 CINCINNATI
115595, 115597	SPRINGVIEW 2603 EZELL
115600	SPRINGVIEW 2607 EZELL
115602	SPRINGVIEW 2944 E. COMMERCE
115603	SPRINGVIEW EZELL (EASEMENT LAND)
115790	SPRINGVIEW 202 GARCIA ST. (FORMER ADMINISTRATION BUILDING FOR EAST TERRACE)
115610	SPRINGVIEW 700 GARCIA ST (VACANT LAND AROUND 2020 GARCIA ST.)
115582	SPRINGVIEW 2407 EZELL
115583	SPRINGVIEW 2411 EZELL
115584, 115585	2415 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
115258, 115259	1528 PASO HONDO
115560	1901 MONTANA ST
115561	1907 MONTANA ST
115586, 512161	E. COMMERCE ST
115581	2830 E. COMMERCE ST
151169	4063 BREMEN ST
374851	1828 E CROCKETT ST
374892	925 POTOMAC
374931	920 POTOMAC
377155	1754 N CENTER
377159	1715 N CENTER
380324	939 POINSETTIA
380325	943 POINSETTIA
380357	906 N GRIMES
477781	SOMERSET RD
477796	9000 SOMERSET RD
580339	7822 GLIDER AVE
419759	4262 W CESAR E CHAVEZ BLVD
314106	7250 GLEN MIST



APPENDIX F: THIRD-PARTY LEASE AGREEMENTS

PHA Plan (Annual Plan). PHAs are generally required to include third-party agreements in their PHA Plans or Significant Amendments to their PHA Plans, based on PHA requirements at 24 CFR part 903. For instance, PHAs are required to include third-party agreements for social services in their PHA Plan. Similarly, PHAs are required to include third-party agreements that generate non-rental income in their PHA Plan as a discussion of financial resources and planned uses of those resources. See 24 CFR part 903.7(c).

Appendix E is reserved for documentation associated with PIH 2017-24. Upon execution of leases executed after the release of PIH 2017-24, lease information will be listed here.

Generally, funds from third-party leases are used to offset operational costs in their respective property.

Agreements	Leased Premises	Lessee
Standard Lease Agreement for Communication Facilities	114 Hickman	New Cingular Wireless PCS, LLC
	1215 Fair Avenue	New Cingular Wireless PCS, LLC
	2103 San Pedro	Sprint Spectrum Realty Company, LLC
	411 Barrera	Cellco Partnership d/b/a Verizon Wireless

