

FY2024 Amendment Plan 1

The FY 2023-2024 MTW Plan Amendment

Proposal and supporting documents are planned to be submitted to HUD for approval on November 2, 2023.

Once approved, Opportunity Home San Antonio intends to implement it immediately.

Proposed Amendment

The organization is proposing amendments to one existing MTW activity.

FY2011-1e: Preservation and Expansion of Affordable Housing

Background

Under Opportunity Home's broader uses of funds authority, Attachment D, the Agency may use MTW funding for local, non-traditional purposes providing that the activities meet the requirements of the MTW statute and comply with PIH 2011-45.

The organization began utilizing its MTW fund authority for housing development efforts in FY2014 once the organization executed an RHF amendment and RHF Plan that was approved by HUD. In FY2016, this activity was revised for FY2016 to refocus on the use of MTW funds to preserve or expand affordable housing units without any Section 8 or Section 9 subsidy.

Proposed Amendment

- The organization is proposing to rename this activity to FY2011-1e | Local, Non-Traditional Uses of MTW Funds to reflect the broader use authority authorized by Attachment D and described in further detail in PIH 2011-45.
- The organization is proposing to amend this activity to include a new local, non-traditional use category of "Service Provision only". The amendment will also allow the organization to use MTW funds under this use category for future services only initiatives.
- The organization is proposing one new metrics to correspond to this new use.

See Section III: Proposed Activities attached for detailed redlines to the FY 2023-2024 MTW Plan.



SECTION III: PROPOSED ACTIVITIES (AMENDED)

FY2011-1e | ~~Preservation and Expansion of Affordable Housing~~ Local, Non-Traditional Uses of MTW Funds

A. Activity Description

~~Under Opportunity Home'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 the organization 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.~~

~~The organization 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 the organization'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 the organization 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 the organization'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).~~



- Under Opportunity Home’s broader uses of funds authority, Attachment D, the Agency may use MTW funding for local, non-traditional purposes providing that the activities meet the requirement of the MTW statute and comply with PIH 2011-45. This activity covers two broader uses of funds:
 - Housing Development Programs and
 - Service Provision
- The organization may use its authority for the following:
 - Housing Development: Since 2011, the organization has leveraged MTW fungibility to acquire, renovate, and/or build units that are not public housing or housing choice voucher units.
 - The organization maintains an affordable housing portfolio, Beacon Communities, and continues to evaluate and make investments in these properties as needed as part of an agency-wide preservation effort.
 - Service Provision (Households Receiving Local, Non-Traditional Service Only): Beginning in FY2024, the organization will be utilizing its authority to provide services for low-income residents that are not also receiving housing assistance.

B. Activity Metrics Information

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
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).	None	None

Data Source: Internal development tracking.

HC #2: Units of Housing Preserved



Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	Housing units preserved prior to implementation of the activity (number).	Expected housing units preserved after implementation of the activity (number).	None	None
<i>Data Source: Internal preservation tracking.</i>				

Households Receiving Local, Non-Traditional Service Only

This metric corresponds to Section 2 LNT Services only reporting.

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average number of households per month receiving services at the child care center (excludes households in Public Housing and Voucher Programs)	0	[enter anticipated enrollment]	None	None
<i>Data Source: Data Sharing Agreement with the partner</i>				

C. Cost Implications

The organization plans to invest funds under this activity as outlined in Section V.A.iv. Planned Application of PHA Unspent Operating Fund and HCV Funding:

- Alazan Phase I and Predevelopment Costs - \$17 million
- Investment in MTW units at Tax Credit/Beacon Properties - \$9.5 million
- Balance of Snowden Development Funding Gap - \$6.5 million
- Investment in Midcrowne and Ravello Properties - \$5 million
- Acquisition of additional interest in a Tax Credit Property - \$5 million
- Additional Impact of Compensation Study - \$2.4 million
- Alazan Future Phases - \$5.7 million



- Building Readiness for Child Care centers - \$3 million
- Additional Investment in the 100 Labor Street Project - \$2.5 million
- Preservation of Affordable Housing - \$2 million

D. Need/Justification for MTW Flexibility

Under Opportunity Home's broader uses of funds authority, Attachment D, the Agency may use MTW funding for local, non-traditional uses providing that the activities meet the requirement of the MTW statute and comply with PIH 2011-45.

The organization has identified a critical local need for affordable childcare not only for residents who are residing at our properties or utilizing a voucher but for other low income families who we are not currently able to serve through our housing inventory. As such, the organization has developed a partnership that will allow the organization to use MTW funds to support a new affordable child care center that is available only to households making 80% or below AMI. The center will be available to households currently receiving housing assistance as well as those who are not and making 80% AMI or below.

E. Rent Reform/Term Limit Information

Not Applicable.



RESOLUTIONS AND CERTIFICATIONS

TO BE COMPLETED AFTER THE PUBLIC COMMENT PERIOD

This section includes the Agency's resolutions, certifications, and other documentation requirements as required by HUD Form 50900: Elements of Annual MTW Plan for the Proposed Amendment.

1. Board Resolution
2. Public posting materials
3. Operations Committee materials
4. Public comment documentation



PUBLIC COMMENT DOCUMENTATION

TO BE COMPLETED AFTER THE PUBLIC COMMENT PERIOD

