

# Annual **MTW PLAN**

Fiscal Year 2023-2024

**July 1, 2023 to June 30, 2024**

Formerly San Antonio Housing Authority

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## Section I | Introduction

### Section I. A. | Table of Contents

<b>Section I   Introduction</b>	<b>3</b>
Section I. A.   Table of Contents	3
Section I. B.   Overview of Short-term and Long-Term MTW Goals and Objectives	5
<b>Section II   General Operating Information</b>	<b>9</b>
Section II. A.   Housing Stock Information	9
Section II. A. i. Planned New Public Housing Units	9
Section II. A. ii. Planned Public Housing Units to be Removed	9
Section II. A. iii. Planned New Project Based Vouchers	10
Section II. A. iv. Existing Project Based Vouchers	10
Section II. A. v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year	11
Section II. A. vi. General Description of All Planned Capital Expenditures During the Plan Year	11
Section II. B.   Leasing Information	12
Section II. B. i. Planned Number of Households Served	12
Section II. B. ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing	13
Section II. C.   Waiting List Information	14
Section II. C. i. Waiting List Information Anticipated	14
Section II. C. ii. Planned Changes to Waiting List in the Plan Year	15
<b>Section III   Proposed MTW Activities</b>	<b>16</b>
FY2024-1   Elimination of Earned Income Disregard	16
A. Activity Description	16
B. Activity Metrics Information	16
C. Cost Implications	17
D. Need/Justification for MTW Flexibility	17
E. Rent Reform/Term Limit Information	17
E. i. Impact Analysis	17
E. ii. Hardship Criteria	18
E. iii. Description of Annual Re Evaluation	18
E. iv. Transition Period	18
<b>Section IV   Approved MTW Activities</b>	<b>19</b>
A. Implemented Activities	19
FY2011-1e   Preservation and Expansion of Affordable Housing	19
FY2011-9   Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	22
FY2013-2   Simplified Earned Income Disregard (S-EID)	24
FY2013-4   HQS Inspection of Opportunity Home properties by Opportunity Home inspectors	27
FY2014-3   Faster Implementation of Payment Standard Decreases	29
FY2014-6   HCV Rent Reform	30
FY2015-2   Elderly Admissions Preference at Select Public Housing Sites	34



FY2015-3   Modified Project Based Vouchers (MPBVs)	37
FY2019-1   Local Implementation of SAFMR	41
FY2019-2   Alternate Recertification Process	47
FY2020-1   College & University Homeless Assistance Program	50
FY2020-3   Family Self Sufficiency (FSS) Program Streamlining	53
FY2021-1   Next Step Housing Program	54
FY2021-2   Limiting increases in rents	57
FY2022-1   Resident Income Exclusions	59
B. Not Yet Implemented Activities	61
FY2023-1   Property-based local, non-traditional rental subsidy program (referred to locally as PH-like)	61
C. Activities On Hold	63
D. Closed Out Activities	63
<b>Section V   Planned Application of MTW Funds</b>	<b>66</b>
Section V. A.   Planned Application of MTW Funds	66
Section V. A. i.   Estimated Sources of MTW Funds	66
Section V. A. ii.   Estimated Application of MTW Funds	66
Section V. A. iii.   Description of Planned Application of MTW Funding Flexibility	67
Section V. A. iv.   Planned Application of PHA Unspent Operating Fund and HCV Funding	69
Section V. A. v.   Local Asset Management Plan	70
Section V. A. vi.   Rental Assistance Demonstration (RAD) Participation	70
<b>Section VI   Administrative</b>	<b>71</b>
Section VI. A.   Board Resolution and Certifications of Compliance	71
Section VI. B.   Documentation of Public Process	80
Section VI. C.   Planned And Ongoing Evaluations	92
Section VI. D.   Lobbying Disclosures	97
<b>Appendix   Additional Items</b>	<b>99</b>
Appendix A   Public Comments Summary Report	100
Appendix B   Summary of Revisions to the Admissions & Continued Occupancy Policy (ACOP)	111
Appendix C   Summary of Revisions to the Administrative Plan	124
Appendix D   Summary of Revisions to the Family Self-Sufficiency (FSS) Action Plan	131
Appendix E   Asset Management Plan	132
Appendix F   Third-Party Lease Agreements	146
Appendix G   Proposed Alternative Definition to Self-Sufficiency	147



## Section I. B. | Overview of Short-term and Long-Term MTW Goals and Objectives

### Strategic Plan 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:** Compassionate, equitable, and vibrant communities where people thrive
- **Mission:** Improve the lives of residents by providing quality affordable housing and building sustainable, thriving communities.
- **Impact Statement:** The San Antonio area has a high quality of life where all are thriving -- starting with Opportunity Home residents.
- **Values:** The Organization has adopted a set of core values.
  - **Equity:** Opportunity Home delivers services in a manner that creates fair outcomes, not just equal opportunities. Equity ensures that systems -- policies, programs, and rules -- do not create unfair results.
  - **Compassion:** Opportunity Home delivers services in a manner that relieves suffering and improves the quality of life of residents.
  - **Excellence:** Opportunity Home delivers services in a manner that sets high standards and improves continuously

### Long-term Outcomes

The strategic plan focuses on priority outcomes for three key populations, residents and employees. Priority long term long-term outcomes have been identified for each population and specific short- to medium-term outcomes suggested to guide strategy development and implementation. The following list also includes outcomes and strategies that are in discussion or development stages.

#### Resident Focus

1. Resident Race does not determine outcomes (Equity)
  - a. Policies, processes and performance evaluations are equitable
  - b. Residents are aware of and understand equity, and how it impacts them
  - c. Organizational culture reflects / advances equity
  - d. Opportunity Home is recognized as a national equity leader
  - e. Opportunity Home is recognized as an Equity leader locally
  - f. Residents live in units that are designed for accessibility and aging in place
2. Residents feel safe
  - a. Security upgrades are budgeted and prioritized in capital planning
  - b. Residents walk more / feel safer to walk near property
  - c. Residents are represented by Resident Councils

- d. Residents report instances of bullying to community managers
- e. Residents are knowledgeable about how to protect themselves and their property
- f. Residents are prepared for emergencies
- 3. Residents live in quality homes
  - a. Preventative schedules are in place and are followed
  - b. Maintenance effectively addresses ongoing work orders
  - c. Maintenance effectively prevents unscheduled, avoidable issues
  - d. Capital improvement plan is in place and is based on physical needs assessment / extends useful life of existing assets
  - e. Opportunity Home ensures quality of new construction, rehabilitation and modernization work
  - f. HCV landlords maintain buildings and properties to high quality standards
  - g. Partnerships maintain buildings and properties to high quality standards
- 4. Residents have meaningful housing choice
  - a. Residents know what choice they have (do not lack information about existing options)
  - b. Residents have the resources to make informed decisions (do not lack information about feasibility, pros/cons, processes)
  - c. Residents have the resources to follow through on their decisions (tradeoffs and costs are mitigated or addressed)
  - d. Residents' choices are not limited by the quantity of housing units affordable to them

#### Employee Focus

- 1. Employees thrive at work
  - a. Employees recommend Opportunity Home as a great place to work
  - b. Opportunity Home promotes and encourages employee wellness
  - c. Leadership Development
  - d. Personal and Professional Development and Training
  - e. Employee performance / teamwork
- 2. Employees manage data effectively
  - a. Improve Data Governance
  - b. Improve Data Literacy
  - c. Improve Data Quality
  - d. Improve Data Access Management
  - e. Improve IT Data Management

#### Community Focus

- 1. Community trusts Opportunity Home and funds our mission
  - a. Employees are good ambassadors for the organization



- b. Community associates Opportunity Home with high quality, extremely affordable housing for first-time homebuyers
- c. Partners value robust partnerships with Opportunity Home

#### Ongoing Monitoring

1. Utilization & Occupancy
  - a. Increase occupancy through marketing strategies and utilize social media to highlight properties
  - b. Develop a resident retention plan for Beacon Communities that engages with residents 120 days, 90 days, and 60 days prior to lease expiration and offers incentives for renewing leases early.
  - c. Partner with local organizations for housing referrals
  - d. Alternate hiring / staffing approaches (targeted outsourcing and use of temps)
  - e. Focus on training new hires to decrease processing delays
  - f. Implement Owner Incentive Program to increase landlord participation
2. MTW STS Compliance
  - a. Create over 2,000 units through the use of MTW LNT Activities
  - b. See Utilization & Occupancy strategies above
3. Strategy Management
  - a. Focus efforts on organizational priorities
  - b. Align position and department goals to organizational priorities
  - c. Adjust strategy and execution when off track
  - d. Develop strategy based on valid assumptions
  - e. Ensure employees are knowledgeable about & engaged in organizational priorities
  - f. Accomplish ad hoc strategic objectives
  - g. Leverage connections between strategic plan and data governance, budget, IT, and HR
  - h. Ensure employees can quickly find and operationalize information

#### Under Discussion or Development

1. Residents have a high quality of life
2. Community's economy and health outcomes are sustained for future generations
3. Customer Service/Customer Experience

In FY2022 (July 2021 - June 2022), surveys went out to all residents to capture changes to resident sentiment since baselines established the previous year. The results of this survey provided valuable strategic plan information. First, the survey results updated key indicators for



the four priority resident-focused strategic plan outcomes (see list above). Second, the survey results also updated the list of key challenges to achieving each of the four priority outcomes. In some cases, the survey results confirmed the importance of existing strategies, in other cases they challenged them. Several planning groups decided to reassess and rebuild strategies to better reflect and respond to resident feedback. Additionally, the Employees Thrive at Work planning group researched, proposed, and finalized a new employee survey that went out in July 2022. The organization's emphasis on Equity continued with the recruitment and onboarding of a new Director of Equity, Diversity, and Inclusion.

The strategic plan is being updated through a process that will periodically assess the following plan elements in light of new information:

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 Operating Information

### Section II. A. | Housing Stock Information

#### Section II. A. 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	TOTAL UNITS	POPUL ATION TYPE**	Section 504 Access ible Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A									

**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

#### Section II. A. 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
NA	NA	NA

**TOTAL:**

0

Public Housing Units to be Removed  
in the Plan Year



## Section II. A. iii. Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASE D	RAD?	DESCRIPTION OF PROJECT
N/A			
<b>TOTAL:</b>	<b>0</b>		
Planned new Project Based Units in Plan Year			

## Section II. A. iv. Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year.

PROPERTY NAME	NUMBER OF PROJECT- BASED VOUCHERS	PLANNE D 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)



<b>Total:</b>	<b>130</b>
Planned Existing Project-Based Vouchers	

## Section II. A. v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

### PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. As of the drafting of the MTW Plan, It is anticipated that the property will begin re-occupancy in March 2023. This project has had substantial delays due to COVID-19 and other litigation issues.

Springview (TX006000031) - 202 Garcia St and 700 Garcia St (Sheriff's Annex and Surrounding Vacant land) 25 units (18 (Bldg B) and 7 (Bldg C) were moved to offline status on June 27, 2023 moved to offline due to current unit conditions.

The organization will be obtaining HUD approval to dispose of public housing real estate. This disposition is planned for FY2024.

- Victoria Plaza/OP Schnabel TX006000008
  - Victoria Commons, YMCA building located at 440 Labor Street, San Antonio, Texas 78210
    - The organization 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 Commons Administration Building located at 400 Labor Street, San Antonio, Texas 78210
    - The organization 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.

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. The organization 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.

## Section II. A. vi. General Description of All Planned Capital Expenditures During the Plan Year

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



## GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

The organization'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 was completed in 2022.

Property	Budget (\$)	Description
Alazan-Apache	581,000	Admin. Building Roof / Foundation
Blanco	224,000	Cooling Tower
Cross Creek	20,000	Foundation / Drainage
Fair Avenue	1,087,320	Elevator Modernization
Highview	526,500	Stormwater Drainage Improvements
Lewis Chatham	TBD	Generator Modernization
Lincoln Heights	160,000	Computer Lab ADA - Access
Lincoln Heights	3,209,000	Lead Based Paint Project
Mission Park	951,000	Lead Based Paint Project
Mission Park	25,000	Foundation Repairs
Morris Beldon	350,000	Site Improvements - Parking Lot
Parkview	884,000	Elevator Modernization
Riverside	700,000	Lead Based Paint Project
Riverside	TBD	Ext Repairs, Roof, Siding, Site Improv.
Springview	140,000	S&S Solar Lights, Security Cameras
Springview	47,000	Site Improvements-Asphalt Curb
Victoria Plaza	100,000	1st Floor / Unit Flooring
Victoria Plaza	2,000,000	Roof Replacement
Villa Tranchese	120,000	S&S Camera, Intrusion Control System
W.C. White	TBD	Generator Modernization
William Sinkin	20,000	Foundation Repairs

## Section II. B. | Leasing Information

### Section II. B. i. 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 HOUSEHOLD TO BE SERVED**
MTW Public Housing Units Leased	68,988	5,749



PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
MTW Housing Choice Vouchers (HCV) Utilized	139,200	11,600
Local, Non-Traditional: Tenant-Based^	NA	NA
Local, Non-Traditional: Property-Based^	25,852	2,154
Local, Non-Traditional: Homeownership^	NA	NA
<b>Planned Total Households Served:</b>	<b>234,040</b>	<b>19,503</b>

\* "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 Household To Be Served**
Tenant-based		NA	NA
Property-Based		25,852	2,154
Homeownership		NA	NA

\* 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.

## Section II. B. ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	The post-pandemic labor shortage has impacted our ability to hire maintenance technicians, which is impacting our ability to turnover vacant units in a timely manner. Opportunity Home is exploring new recruitment techniques, to include partnering with trades skills training programs to provide an employment pathway for skilled workers, to fill vacancies in the maintenance technician position.
MTW Housing Choice Voucher	The organization continues to experience low staffing levels and an increase of landlords not willing to accept the HCV program as well as other rental market changes. The organization anticipates issues related to low staffing to resolve in FY2024 due to current recruitment efforts as well as procuring an outside vendor to help address the backlog of recertifications. In addition, on July 1, 2023 the organization announced the Owner Incentive Program which



	will provide \$500 to owners who lease to HCV and Mainstream program participants under new contracts. See Utilization & Occupancy strategies in section I.
Local, Non-Traditional	None.

## Section II. C. | Waiting List Information

### Section II. C. 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
Housing Choice Voucher	Voucher	10,389	Closed	Yes
Public Housing	Site-Based	59,531	Open	N/A
La Posada MOD Rehab	Site-Based	39,216	Open	N/A
Prospect Hill MOD Rehab	Site-Based	1,599	Open	N/A
Serrento MOD Rehab	Site-Based	26,283	Open	N/A
East Meadows Project-Based Vouchers	Site-Based	17,407	Open	N/A
Gardens at San Juan Project-Based Vouchers	Site-Based	36,803	Open	N/A
Wheatley Park Senior Project-Based Voucher	Site-Based	983	Open	N/A
PBV Preferred Beacon	Site-Based	0	Open (Referrals Only)	N/A
Emergency Housing Voucher	Voucher	0	Open (Referrals Only)	N/A
Local Non-Traditional Property-Based	Voucher	0	Closed (Referrals Only)	Yes

#### Please describe any duplication of applicants across waiting lists:

The total unique number of waitlist applicants across all waitlists is 192,211. There are currently: 10,389 S8



waitlist applicants, 122,291 for MOD/PBV, and 59,531 in PH.

## Section II. C. 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	The HCV WL was reopened from June 29, 2022 - July 13, 2022. At the end of the closing date, all applicants were selected to be placed on the waitlist. Opportunity Home anticipates re-opening the waitlist in Fall 2023 depending on the nature of draws at the beginning of the year.
La Posada MOD Rehab	None
Prospect Hill MOD Rehab	None
Serrento MOD Rehab	None
Public Housing	The 70 preferred development waitlists were closed early FY22 and replaced with three 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 three PH Lists are: 1. Family Housing 2. Elderly/Disabled Housing 3. 504 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 Voucher	The Agency is planning to transition away from site-based PBV waitlists.
PBV Preferred Beacon	None
Local Non-Traditional Property-Based	The Agency is expecting to establish the local non-traditional property-based waitlist in FY2024.



## Section III | Proposed MTW Activities

### FY2024-1 | Elimination of Earned Income Disregard

#### A. Activity Description

- This activity replaces FY2013-2, Simplified Earned Income Disregard (S-EID) MTW Activity and eliminates EID for the Housing Choice Voucher (HCV) and Public Housing (PH) Programs. S-EID was originally implemented in PH as a way to simplify the traditional EID calculation while also expanding the number of months for which EID would be available to participants. However, following updates to the traditional EID rules through the Streamlining Final Rule published on March 8, 2016, the traditional rules were simplified beyond the S-EID established by Opportunity Home. S-EID has now been phased out. Opportunity Home continues to disregard income for Family Self-Sufficiency (FSS) participants and Jobs Plus Program participants in accordance with their program rules.
- Additionally, increases in income are no longer picked up in between recertifications for HCV and PH residents, and all residents are now on a triennial recertification schedule. Therefore, the EID timeframe and rules would no longer be effective in increasing self-sufficiency as Opportunity Home disregards income increases for all residents.
- The elimination of traditional EID will allow staff to focus on furthering the success of the FSS and Jobs Plus Program, which are both self-sufficiency programs that provide caseworker management and supportive education, training, employment and financial counseling coupled with the earned income disregard. The elimination of EID will also reduce cost and administrative burden with managing EID participants and calculating the EID correctly.
- As Opportunity Home has eliminated traditional EID through the S-EID MTW Activity, FY2024-1 will have been implemented already upon approval of the MTW Plan.

#### B. Activity Metrics Information

##### CE #3 | Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average error rate in completing a task as a percentage (decrease).	30%	0%	None	None

*Data Source:* Baseline set using FY2013-2 FY2022 actuals from internal auditing; benchmark set to 0% since the task is eliminated by the activity



## C. Cost Implications

- This activity does not have any cost implications.

## D. Need/Justification for MTW Flexibility

- MTW Agreement Attachment C, Section C(11) -- Rent Policies and Term Limits
  - The Agency is authorized to determine family payment, including the total tenant payment, the minimum rent, utility reimbursements and tenant rent. The Agency is authorized to adopt and implement any reasonable policies for setting rents in public housing including but not limited to establishing definitions of income and adjusted income, or earned income disallowance that differ from those in current statutes or regulations. The Agency is authorized to adopt and implement term limits for its public housing assistance. Such policies must include provisions for addressing hardship cases. This authorization waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A as necessary to implement the Agency's Annual MTW Plan.
- MTW Agreement Attachment C, Section D(2)(a) -- Rent Policies and Term Limits
  - The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency's Annual MTW Plan;
- Section C(11) (Rent Policies and Term Limits) and Section D(2)(a) (Rent Policies and Term Limits) authorize the agency to establish earned income disallowances that differ from those in current statutes or regulations.

## E. Rent Reform/Term Limit Information

While this activity is considered a rent reform activity; because the organization has administered a very limited version of EID since 2014 and has phased it out, there is no anticipated impact to existing residents.

### E. i. Impact Analysis

There are currently no households receiving earned income disregard. There are 5 households on SEID which will phase out in FY2023 or within the triennial certification timeframe with no income increases being processed.



**E. ii. Hardship Criteria**

There are currently no households receiving earned income disregard; therefore, there is no need to hardship criteria.

**E. iii. Description of Annual Re Evaluation**

Not applicable.

**E. iv. Transition Period**

The organization has already transitioned to no earned income disregard by phasing out the original SEID activity FY2013-2 and moving to not picking up income increases in between triennial recertifications.



## Section IV | Approved MTW Activities

### A. Implemented Activities

#### FY2011-1e | Preservation and Expansion of Affordable Housing

##### Plan Year Approved, Implemented, Amended

This activity was approved and implemented in the FY 2010-2011 MTW Plan.

##### 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 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).

## 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) properties that are at or approaching the end of the initial 15 year compliance period. This may include properties where an Opportunity Home 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 broader 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. Alhambra
2. Artisan at Creekside
3. Artisan at Mission Creek
4. Artisan at Salado Falls
5. Costa Almadena
6. Costa Mirada
7. Elan Gardens
8. Midcrown Senior Pavillion
9. Rosemont at University Park
10. San Juan Square I

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

## Planned Changes to Metrics / Data Collection

### HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Changes to	Changes to Data
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			Metrics	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

## 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

## Planned Significant Changes

Opportunity Home plans to amend this activity using the MTW Amendment process.

The organization is proposing to amend this activity to include a new local, non-traditional use category of “Service Provision only”. Opportunity Home plans to use funds to prepare a property for use as a preschool academy referenced in Appendix E – Asset Management Plan under Sheriff’s Annex section. Funds will be used for predevelopment and construction. The organization’s external partner will operate and provide ongoing funding for the school.

The organization’s planned timeline for the Amendment Process:

- Oct 2 - Nov 1: Amendment posted / Public Comment Period
- Oct 18: Public Hearing
- Nov 1: Consideration and approval by Board of Commission
- Nov 3: Submission to MTW HUD Office



## **FY2011-9 | Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services**

### **Plan Year Approved, Implemented, Amended**

This activity was approved in FY 2010-2011 and implemented in the same fiscal year. This activity has been amended as follows:

- **FY 2019-2020:**
  - Added up to forty (40) additional tenant-based vouchers to support a Permanent Supportive Housing (PSH) provider currently partnered with the organization 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 set-aside voucher to another jurisdiction.
  - Adopted a hardship policy: a set-aside voucher recipient may be given the opportunity to port out of the organization'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.

### **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:** the organization 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 the organization. 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).

## Planned non-Significant Changes

None.

## Planned Changes to Metrics / Data Collection

### HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase housing choice (increase).	0	Up to 340	None	None

### Maintain Households Served

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Percentage of households served that continue to be housed after 2 years (increase).	0	90%	The organization will be replacing these metrics with Average Tenure	None
Percentage of households served that continue to be housed after 1 years	0	90%		None

### Average Tenure

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average tenure or length of stay in the set-aside program	2 year	2 years	The organization will be adding this metric to replace Maintain Households Served	None

## Planned Significant Changes

None.



## FY2013-2 | Simplified Earned Income Disregard (S-EID)

### Plan Year Approved, Implemented, Amended

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

- FY 2014-2015: 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.
- FY 2015-2016: Established the requirement that families complete financial literacy classes.

### Description/Update

**Update:** This activity is planned for close out during FY2023 and will be superseded by FY2024-01 Elimination of Earned Income Disregard once approved by HUD.

#### Description:

Statutory Goal	Housing Programs	Additional Requirements
<ul style="list-style-type: none"><li>▪ Self-Sufficiency</li><li>▪ Cost Effectiveness</li></ul>	<ul style="list-style-type: none"><li>▪ MTW Housing Choice Voucher</li><li>▪ Public Housing</li></ul>	<ul style="list-style-type: none"><li>▪ Must complete financial literacy classes</li><li>▪ Must enroll in an approved self-sufficiency program</li><li>▪ Current approved programs:<ul style="list-style-type: none"><li>▪ Westside Jobs Plus Program</li><li>▪ Annie E. Casey/East side Jobs Plus Program</li></ul></li><li>▪ Self-sufficiency programs NOT approved:<ul style="list-style-type: none"><li>▪ Family Self-Sufficiency (FSS) Program</li><li>▪ HUD Jobs-Plus at Cassiano Homes</li></ul></li></ul>

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.

## Planned non-Significant Changes

None.

## Planned Changes to Metrics / Data Collection

### CE #3 | Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	None	None

### SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase self sufficiency (increase).	Households receiving self sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self sufficiency services after implementation of the activity (number).	None	None



## SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	None	None

## Planned Significant Changes

This activity is planned for close out during FY2023 and will be superseded by FY2024-01 Elimination of Earned Income Disregard once approved by HUD.



## FY2013-4 | HQS Inspection of Opportunity Home properties by Opportunity Home inspectors

### Plan Year Approved, Implemented, Amended

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY 2012-2013 MTW Plan. Implementation began on January 1, 2013.

### Description/Update

**Update:** This activity is ongoing. The Agency continues to experience cost efficiencies by conducting inspections of Opportunity Home properties by Opportunity Home Inspectors.

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

The organization 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 Opportunity Home 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 the organization 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.

### Planned non-Significant Changes

None.

### Planned Changes to Metrics / Data Collection

#### CE #1 | Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Total cost of the task in dollars (decrease).	\$61.60 per inspection	\$44.24 per inspection	None	None



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## Planned Significant Changes

None.



## FY2014-3 | Faster Implementation of Payment Standard Decreases

### Plan Year Approved, Implemented, Amended

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY 2013-2014 MTW Plan.

### 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 the organization 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, the organization will provide the participant a 30-day notice of rental increase.

### Planned non-Significant Changes

None.

### Planned Changes to Metrics / Data Collection

#### CE #1 | Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Total cost of the task in dollars (decrease).	12,129 Annual Average Households Served (FY2014) multiplied by \$568.43	12,129 Annual Average Households Served (FY2014) multiplied by \$568.43	The organization will reset baseline and benchmarks to reflect more up to date information: MTW baseline is 12,421 and projected per unit cost for FY24 is \$723.10	None

### Planned Significant Changes

None.



## FY2014-6 | HCV Rent Reform

### Plan Year Approved, Implemented, Amended

#### Previously approved

This activity was approved as two separate activities and subsequently combined into one activity. (FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule)

Both activities are designed to work together to reduce cost and increase cost effectiveness. For FY 2014-6 Rent Simplification, the Agency received HUD approval as part of the FY 2013-2014 Plan and began implementation in July 2014. For FY 2015-4: 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 FY 2014-2015 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 FY 2015-1, and not this activity FY2014-6.

### 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, the organization 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. the organization 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 the tenant, and type of appliances (gas/electric).

This activity establishes a new, simplified schedule that is based on the analysis of data collected from the organization'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. the organization 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.



## Planned non-Significant Changes

The new FSS final rule eliminated the need for FY 2020-3 to address the 120-day rule. The modified contract element of that activity is still needed to support this activity, FY2014-6 Rent Reform activity. In an effort to streamline activity reporting and group waivers working together, the FSS waiver will be moved under FY2014-6 and the FY2020-3 activity will be closed out in the FY2023 Report. The organization is not making any changes to the waiver or use of waivers; rather, re-grouping the waivers as a result of other HUD streamlining efforts.

## Planned Changes to Metrics / Data Collection

### CE #1 | Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Total cost of the task in dollars (decrease).	1 hours per processed file	.25 hours per processed file	None	None

### CE #3 | Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average error rate in completing a task as a percentage (decrease).	11%	40%	None	None

### SS #8: Households Transitioned to Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the	0	43	None	None



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"Outcome" number  
should also be  
provided in Section  
(II) Operating  
Information in the  
space provided.

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## **Planned Significant Changes**

None.



## FY2015-2 | Elderly Admissions Preference at Select Public Housing Sites

### 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.

### 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. The organization 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, the organization 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 the organization 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.

## Planned non-Significant Changes

None.

## Planned Changes to Metrics / Data Collection

### 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
Total	231	378	None	None
Fair Avenue	110	173	None	None
WC White	38	60	None	None
Lewis Chatham	60	95	None	None



Marie McGuire	23	50	None	None
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### Elderly Household Percentage

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Percentage of units occupied by elderly households	Percentage of units occupied by elderly households prior to implementation of the activity	Expected percentage of units occupied by elderly households after implementation of the activity	None	None
Total	51%	80%	None	None
Fair Avenue	51%	80%	None	None
WC White	51%	80%	None	None
Lewis Chatham	51%	80%	None	None
Marie McGuire	34%	80%	None	None

### Planned Significant Changes

None.



## **FY2015-3 | Modified Project Based Vouchers (MPBVs)**

### **Plan Year Approved, Implemented, Amended**

This activity was approved in FY 2014-2015 and implemented in the same fiscal year. It has been amended two times since implementation.

#### **FY 2019-2020 Amendments:**

- Allocated eighty (80) additional project-based vouchers to support the follow initiatives:
  - THRU Project: Up to ten (10) modified PBVs at Opportunity Home 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 Opportunity Home properties will be committed to support the South Alamo Regional Alliance for the Homeless (SARAH). SARAH is the local Continuum of Care Lead Agency charged 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 Opportunity Home'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 Opportunity Home - Beacon development. These units will support a new homeless college program as outlined in the proposed activity, FY 2020-2: 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.

#### **FY 2020-2021 Amendments:**

- Relocated ten (10) MPBVs previously approved under this activity to a new activity, FY 2021-1: 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 the organization 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 the organization to determine the contract rent in accordance with PBV regulations. Current regulations require the organization 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.

## 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 the organization to commit vouchers to developments in the organization'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 Opportunity Home-assisted households) is not able to afford a tax credit rent affordable to a 30% AMI household.

the organization may commit vouchers to any Opportunity Home owned or controlled development. This activity applies only to commitment of vouchers to Opportunity Home 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.

## Planned non-Significant Changes

None.

## Planned Changes to Metrics / Data Collection

### 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.	0	0	None	None

### Median Household Income

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Median income of households living in local project based	AMI upper limit of households living in units	Targeted AMI upper limit of households living in units	None	None



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set-aside voucher  
units, by income  
bracket

80% AMI	80% AMI	75% AMI	None	None
60% AMI	60% AMI	55% AMI	None	None
50% AMI	50% AMI	45% AMI	None	None
30% AMI	30% AMI	25% AMI	None	None

## Planned Significant Changes

None.



## FY2019-1 | Local Implementation of SAFMR

### Plan Year Approved, Implemented, Amended

This activity was approved in FY 2018-2019 and implemented in the same fiscal year.

- FY 2018-2019: 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
- FY 2019-2020: 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.

### 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, the organization 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 Opportunity Home 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 (FY 2018-2019).

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 the organization 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 the organization'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.

The organization'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), the organization 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. the organization will cap the total monthly family contribution at the current amount for the remaining months in their current lease term.

## **Planned non-Significant Changes**

None.

## **Planned Changes to Metrics / Data Collection**

### **HC #5: Increase in Resident Mobility**

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	41%	41%	None	None



### Lease-up Success Rate by Post-Move Group

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Percent of vouchers issued that were leased-up within 120 days	89%	86%	Benchmarks are being updated	None

### Average # of days searching by Post-Move Group

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average number of days between the date the voucher is issued and the date the request for tenancy (RTA) is approved.	58 days	58 days	None	None

### Average HAP by Group

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average Housing Assistance Payment by Group	Group 1: \$601 Group 1 - EO: \$609 Group 2: \$608 Group 2 - EO: \$591 Group 3: \$614 Group 4: \$620 Group 5: \$690 Group 6: \$603 Group 7: \$707 Group 8: \$847 Group 9: \$755 Group 10: \$876	Group 1: \$601 Group 1 - EO: \$609 Group 2: \$608 Group 2 - EO: \$591 Group 3: \$614 Group 4: \$620 Group 5: \$690 Group 6: \$603 Group 7: \$707 Group 8: \$847 Group 9: \$755 Group 10: \$876	None	None



### Households moving to a better neighborhood by Post-Move Group

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Percentage of households self-reporting that they consider the unit for which they submitted a request to be in a better neighborhood than their current place of residence on post-move surveys (increase).	87%	87%	In FY2024, the organization may adjust the metric and/or baselines and benchmarks to reflect the new data collection effort through a new surveying function	Due to the pandemic, the survey used for this indicator was put on hold. The organization has developed a new organization-wide surveying function and is working to incorporate this question or a derivative in forthcoming surveys.

### HCV Concentration by Group

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
HCV households living in each Group as a percentage of total renter households	Group 1: 8% Group 2: 8% Group 3: 10% Group 4: 3% Group 5: 2% Group 6: 3% Group 7: 2% Group 8: 0% Group 9: 1% Group 10: 1%	Group 1: 8% Group 2: 8% Group 3: 10% Group 4: 3% Group 5: 2% Group 6: 3% Group 7: 2% Group 8: 0% Group 9: 1% Group 10: 1%	None	None

### Planned Significant Changes

None.



## **FY2019-2 | Alternate Recertification Process**

### **Plan Year Approved, Implemented, Amended**

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by providing an alternate schedule for the annual reexamination process, specific PH review procedures, and certification methods of income and assets. The use of oral verifications reduces the organization's administrative costs for postage, paper and envelopes when mailing written third party verification to the client's employer. The activity was approved in the FY 2018-2019 MTW Plan and implemented in FY 2018-2019.

In FY2023, the activity was amended as follows:

- (1) change to the alternate schedule for the housing choice voucher programs and public housing program; all households were moved to triennials.
- (2) adding alternate payment standard increase procedures.

### **Description/Update**

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. In FY2023, the agency updated the schedule for all households to triennials.

Beginning FY2016, the organization 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, the organization 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. This activity allows the organization 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)**

Prior to this activity, the organization accepted self-certification for assets valued below \$5,000. In order to further streamline administrative processes, the organization 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, the organization 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, the organization 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, the organization wanted to reduce the number of applicants re-submitting documents for approved extensions of vouchers (if in HCV Program) and/or reasonable accommodations. the organization 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, this activity allows the organization to apply the increased payment standards at each approved request for rental increase.

## **Planned non-Significant Changes**

None.

## Planned Changes to Metrics / Data Collection

### CE #1 | Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Total cost of the task in dollars (decrease).	HCV: \$407,067 PH: \$201,964.50 Total: \$609,032	HCV: \$152,264 PH: \$48,570 Total: \$201,224 Expected savings: 407,808	Benchmarks are being updated	None

### CE #3 | Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average error rate in completing a task as a percentage (decrease).	HCV: 16% PH: 45%	HCV: 16% PH: 40%	None	None

## Planned Significant Changes

None.



## FY2020-1 | College & University Homeless Assistance Program

(formerly Palo Alto College, College Homeless Assistance Program)

### 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 FY 2019-2020 MTW Plan and implemented in the same fiscal year.

### Description/Update

**Update:** This activity is in early implementation and the organization 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 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 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 FY 2019-1: Local Small Area Fair Market Rent Implementation), and MTW alternative examinations (see FY 2019-2: 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, the organization 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 the organization 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, the organization will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

## Planned non-Significant Changes

### Planned Changes to Metrics / Data Collection

#### 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.	Palo Alto - 0 St. Philips - 0	Palo Alto - up to 20 St. Philips - up to 30	None	None

#### HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase housing choice (increase).	Palo Alto - 0 St. Philips - 0	Palo Alto - up to 20 St. Philips - up to 30	None	None

#### SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase self sufficiency (increase).	Palo Alto - 0 St. Philips - 0	Palo Alto - up to 20 St. Philips - up to 30	None	None

## Planned Significant Changes

None.



## FY2020-3 | Family Self Sufficiency (FSS) Program Streamlining

### 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 FY 2019-2020 MTW Plan.

### Description/Update

**Update:** The new FSS final rule eliminated the need for this activity to address the 120-day rule. The modified contract element is needed due to the FY2014-6 Rent Reform activity. In an effort to streamline activity reporting and group waivers working together, this waiver will be moved under FY2014-6 and the FY2020-3 activity will be closed out in the FY2023 Report.

**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:

- **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.

### Planned non-Significant Changes

The new FSS final rule eliminated the need for this activity to address the 120-day rule. The modified contract element is needed due to the FY2014-6 Rent Reform activity. In an effort to streamline activity reporting and group waivers working together, this waiver will be moved under FY2014-6 and the FY2020-3 activity will be closed out in the FY2023 Report.

### Planned Changes to Metrics / Data Collection

#### CE #1 | Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Total cost of the task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	None	None

### Planned Significant Changes

None.



## FY2021-1 | Next Step Housing Program

### Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices. The activity was approved in the FY 2020-2021 MTW Plan.

### 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 homelessness<sup>1</sup>. 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.

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<sup>1</sup> Youth may currently be in extended foster care.

The organization 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 the organization's housing assistance will provide support.

#### Year 1 (12 months)

- Youth are enrolled in the Next Step Housing Program and receive housing assistance from the organization 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 -- the organization 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.
  - The organization 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 the organization.
  - 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 the organization'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 FY 2019-2: 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 FY 2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.

## Planned non-Significant Changes

None.



## Planned Changes to Metrics / Data Collection

### 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.	0	Year 1: 10 PBVs Year 2: up to 20 (10 PBVs 10 TBVs) Year 3 and beyond: up to 30 (10 PBVS, 20 TBVs)	None	None

### HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase housing choice (increase).	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30	None	None

### SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase self sufficiency (increase).	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30	None	None

## Planned Significant Changes

None.



## FY2021-2 | Limiting increases in rents

### 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 FY 2020-2021 MTW Plan.

### 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. The organization 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 the organization 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.

### Planned non-Significant Changes

None.

### Planned Changes to Metrics / Data Collection

#### HC #4: Displacement Prevention

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	230	230	None	None



### Average Rent Increase

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average rent increase	\$70.16 average requested increase	\$26.30 average accepted rent increase	None	None

### Planned Significant Changes

None.



## FY2022-1 | Resident Income Exclusions

(currently named: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions)

### 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 residents having access to basic non-housing needs. By excluding these contributions from the annual income, clients will be able to receive additional local support and not have their housing assistance negatively impacted. The activity was approved in the FY 2021-2022 MTW Plan.

### 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 partner or contributions distributed to a household on behalf of a 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 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 the organization.

### Planned non-Significant Changes

None.

### Planned Changes to Metrics / Data Collection

#### HC #7: Households Assisted by Services that Increase Housing Choice

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Number of households receiving services aimed to increase	0	Estimated 1,500 served monthly or 18,000 served annually for food	Will be adding partnerships including: San Antonio Food Bank	None



housing choice (increase).	assistance (this may include one household being served multiple months)	City of San Antonio Meals on Wheels Family Service Association (FSA)
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#### CE #4 | Increase in Resources Leveraged

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Amount of funds leveraged in dollars (increase).	0	Estimated \$700,000 leveraged annually for food assistance	None	None

### Planned Significant Changes

None.



## B. Not Yet Implemented Activities

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

#### Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objectives of increasing housing choices for low-income families. The activity was approved in the FY 2022-2023 MTW Plan and is expected to be implemented in FY2024.

#### Description/Update

**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.

Under the organization'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 FY2024 or later:



- Woodhill is a 532-unit family development that is 90% affordable with 479 units reserved at 80% AMI and below and the remaining are market-rate. In FY2021, per FY 2021-1 and FY2015-3, the organization has committed 10 modified project-based vouchers at the property. In addition, the organization has 25 VASH PBVs committed. Per FY2011-1e, the organization has also invested MTW funds for preservation work resulting in 469 units added as local non-traditional units (479 affordable minus 10 MPBVs). Per this activity, 50 of the 469 units will have the PH-like program added and will continue to be counted under LNT.
- 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.
- Alazan Courts: the organization has hired a master planner for this project. Community engagement has begun and the organization 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.

## Planned non-Significant Changes

None.

## Planned Changes to Metrics / Data Collection

### 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.	0	0	None	None

## Planned Significant Changes

None.



## C. Activities On Hold

None.

## D. Closed Out Activities

### 1. **FY2011-1 Block grant funding with full flexibility**

This activity was originally approved as part of the FY 2010-2011 MTW Plan and implemented in that fiscal year. In the FY 2013-2014 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 FY 2010-2011 MTW Plan and implemented in that fiscal year. In the FY 2013-2014 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 FY 2010-2011 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 FY 2011-2012.

### 4. **FY2011-1c Holistic Case Management**

This activity was originally approved as part of the FY 2010-2011 MTW Plan and implemented in that fiscal year. In the FY 2013-2014 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 FY 2010-2011 MTW Plan and implemented in that fiscal year. In the FY 2013-2014 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 FY 2010-2011 MTW Plan and implemented in that fiscal year. In the FY 2013-2014 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 FY 2010-2011 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 FY 2010-2011 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 FY 2010-2011 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 FY 2010–2011 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 FY 2010–2011 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 FY 2010–2011 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 FY 2011–2012 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 FY 2011–2012 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. The organization 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 FY 2019–20 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 FY 2019-20 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 FY 2019-20 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.

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

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.

**26. FY2015-1: MDRC / HUD Rent Study**

This activity was originally approved in FY2015 as part of 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, conducted the Study on behalf of HUD. The study was originally scheduled to end in 2018, but was extended until FY2021 to ensure researchers are able to gather information from two triennial recertification periods. The agreement with the researchers ended in December 2021 and the last recertification was completed in March 2022. All MDRC participants were being transitioned to the rent structure as approved under FY2014-6.



## Section V | Planned Application of MTW Funds

### Section V. A. | Planned Application of MTW Funds

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).

#### Section V. A. 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.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	12,601,910
70600	HUD PHA Operating Grants	165,503,066
70610	Capital Grants	12,815,698
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	2,942
71600	Gain or Loss on Sale of Capital Assets	1,562,022
71200+71300+71310+71400+71500	Other Income	2,587,210
<b>70000</b>	<b>Total Revenue</b>	<b>\$195,072,848</b>

#### Section V. A. 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 expanding during the plan year should not be included in this section.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	20,865,178
91300+91310+92000	Management Fee Expense	10,122,897
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	4,333,710
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	6,181,915
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	23,134,132



95000 (95100+95200+95300+95500)	Total Protective Services	887,665
96100 (96110+96120+96130+96140)	Total Insurance Premiums	1,953,920
96000 (96200+96210+96300+96400+96500+96600+ 96800)	Total Other General Expenses	4,188,823
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	422,629
97100+97200	Total Extraordinary Maintenance	0
97300+97350	HAP + HAP Portability-In	107,833,579
97400	Depreciation Expense	9,100,344
97500+97600+97700+97800	All Other Expense	0
<b>90000</b>	<b>Total Expenses</b>	<b>\$189,024,792</b>

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

Total sources are greater than expenses. FDS line item 97400, Depreciation is a non-cash expense which does not require a cash outlay, however, FDS line item 70610, Capital Grants is a source used for capital costs that are not included in expenses. The net of these two items creates an operating loss which will be covered with MTW HUD-held funds.

## Section V. A. iii. | Description of Planned Application of MTW Funding 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 APPLICATION OF MTW FUNDING 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 The organization 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. The organization 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. The organization 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 organization's 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 The organization 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.

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## Section V. A. iv. | Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY - Final Approved Budget - Projected as of 3/31/2023	Planned Application of PHA Unspent Funds during FY
HCV HAP*	(\$3.9 million)	(\$3.9 million)
HCV Admin Fee	\$4.5 million	\$4.5 million
PH Operating Subsidy	(\$3.9 million)	(\$3.9 million)
HUD-Held HCV Funds	\$71.3 million	\$71.3 million
<b>TOTAL:</b>	<b>\$68 million</b>	<b>\$68 million</b>

### Description

Per Board Resolution 6358 dated June 7, 2023, Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

#### Sources:

- MTW Funds- \$68 million

#### Uses:

- Section 8 funding shortfall - \$1 million
- Public Housing operating shortfall - \$5 million
- Resident Services (CDI) - \$2.4 million
- Central Office operating shortfall - \$1 million
- 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<sup>2</sup>
- Additional Investment in the 100 Labor Street Project - \$2.5 million
- Preservation of Affordable Housing - \$2 million

Total MTW funds obligated is \$68 million.

<sup>2</sup> Investment of MTW funds is dependent on HUD approval of the forthcoming FY2024 MTW Plan Amendment. See Section II page 21 for more information.



## Section V. A. v. | Local Asset Management Plan

- i. Is the MTW PHA allocating costs within statute? Yes
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)? No
- iii. Has the MTW PHA provided a LAMP in the appendix? No
- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year. N/A

## Section V. A. vi. | Rental Assistance Demonstration (RAD) Participation

- i. Description of RAD Participation: The Agency has explored participation in RAD. Currently, the Agency has no plans to move 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**

### **Section VI. A. | Board Resolution and Certifications of Compliance**

This section includes a resolution signed by the Board of Commissioners adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in the Form 50900).

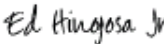


Opportunity Home San Antonio

April 3, 2023

**BOARD OF COMMISSIONERS**  
**Regular Board Meeting**

**RESOLUTION 6335, AUTHORIZING THE PROPOSED 2023-2024 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), CAPITAL FUND PROGRAM PLAN, 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 6335, authorizing the proposed 2023-2024 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 Opportunity Home's designation as a Moving-to-Work (MTW) agency, the MTW Plan serves as Opportunity Home'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 Opportunity Home's policies, programs, operations, strategies and flexibilities in meeting the local housing needs and goals.

Opportunity Home is on track to complete the 2023-2024 Agency Plan in time for April submission to HUD.

1. Proposed new activities
  - a. FY2024-1 | Elimination of Earned Income Disregard: the organization is proposing a new activity using the same MTW waiver as FY2013-2 Simplified Earned Income (EID) that eliminates the HUD earned income disregard (EID). The new activity will also remove the alternative simplified version (S-EID) offered since 2014. This proposed change will not impact FSS escrows or the Jobs Plus Program EID.
2. Proposed changes to existing activities
  - a. Through a non-significant change, the organization is proposing to consolidate the waiver authorized under FY2020-3 FSS Streamlining with the waivers authorized under FY2014-6 Rent Reform. This consolidation is prompted by

## Opportunity Home San Antonio

April 3, 2023

recent HUD changes in the FSS final rule that eliminated the need for a separate activity. The change is administrative and will allow for the streamlining of reporting and re-grouping of waivers that work together.

3. Revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP)
  - a. 4.3.B SELECTION METHOD: This policy was updated to ensure that applicant families affected by officially declared disasters in addition to natural disasters will be eligible for the preference. Additionally, the Single Family Referral Preference was updated to allow for referred individuals to be offered one-bedroom units in addition to efficiency units.
  - b. 6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]: Language was updated to reflect the close-out of FY2013-2 Simplified Earned Income (EID) MTW Activity. FY2024-1 simplifies traditional EID rules beyond those of FY2013-2, and will allow staff to focus on self-sufficiency programs geared toward residents.
  - c. 9.3.C CHANGES AFFECTING INCOME OR EXPENSES: This change will allow residents to not be required to report increases in income during the three-year recertification cycle and therefore not increasing their rent until their next recertification.
  - d. 12.2.E RELOCATION PLAN: The addition of this policy is to ensure that there are clear guidelines established for Opportunity Home to carry out when families are displaced due to the rehabilitation, redevelopment, or demolition of Public Housing residences; or termination of a Housing Choice Voucher Program Landlord.
  - e. 13.3.C OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(l)(2) and (5)(ii)(B)]: The language was changed from "... will result in termination of tenancy" to "may result." This update allows for terminations to be considered on a case-by-case basis when possible to help residents remain on the program.
  - f. 13.3.C OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(l)(2) and (5)(ii)(B)]: A new section was created in 13.3.C(2) to indicate that some lease violations may result in termination of tenancy. This update allows for terminations to be considered on a case-by-case basis when possible to help residents remain on the program.
  - g. 14.3.E PROCEDURES TO OBTAIN A HEARING: This update is to clarify that families terminated from the program have up to one year to request reinstatement. This includes families who had an adverse action upheld via an informal hearing decision or failed to request one.
4. Revisions to the Housing Choice Voucher Administrative Plan (Admin Plan)
  - a. 6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]: Language was updated to reflect the close-out of FY2013-2 Simplified Earned Income (EID) MTW Activity and implementation of the new activity, FY2024-1 Elimination of Earned Income Disregard.
  - b. 12.2.F TERMINATION NOTICE: This section was updated to clarify that Opportunity Home will only consider requests for reinstatement made within one year of a family's termination. This language is added to align with the one year appeals deadline in the court of law.
  - c. 4.3.C SELECTION METHOD & 20.2 Foster Youth to Independence (FYI) Vouchers:



**Opportunity Home San Antonio****April 3, 2023**

The Selection Method section was updated to include the new Foster Youth to Independence (FYI) voucher program waitlist preference, which will affect applicant youth. A new section is being added to Chapter 20 with policies applicable to the FYI vouchers Opportunity Home is acquiring. These FYI vouchers provide housing assistance on behalf of youth referred by a public child welfare agency (PCWA) who are at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care, or will leave foster care, and are homeless or are at risk of becoming homeless at age 16 or older.

5. Revisions to the Family Self-Sufficiency (FSS) Program Action plan
  - a. No revisions are proposed.
6. Capital Fund Program (CFP): General description of all planned Capital Fund Expenditures during the plan year
  - a. Preservation Plans
    - i. Public Housing: Over next 5 years, plan to invest over \$57 million in capital repairs to extend the useful life at 26 properties and approximately 4,305 units.
    - ii. Beacon Communities: Plans to invest approximately \$27 million in capital repairs to extend the useful life at 30 properties and approximately 5,482 units.
  - b. Expansion Plans
    - i. New Construction: Organization has over 5,000 units in the expansion pipeline.

**MTW TIMELINE**

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

**STRATEGIC OUTCOMES:**

Supports all strategic outcomes.

**ATTACHMENTS:**

Resolution 6335  
 Appendix A: Public Comment Summary  
 Presentation  
 Outreach and Comment Summary Presentation

**Opportunity Home San Antonio  
Resolution 6335**

**RESOLUTION 6335, AUTHORIZING THE PROPOSED 2023-2024 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), CAPITAL FUND PROGRAM PLAN, FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN**

**WHEREAS**, the Board of Commissioners of Opportunity Home San Antonio, a public instrumentality created pursuant to the laws of the State of Texas ("Opportunity Home") must approve the 2023-2024 Moving to Work (MTW) Agency Plan for fiscal year 2023-2024, 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, five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action plan; and

**WHEREAS**, the Board of Commissioners of Opportunity Home San Antonio also desires to authorize the submission of the 2023-2024 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 Opportunity Home San Antonio hereby:

- 1) Approves Resolution 6335, authorizing the proposed 2023-2024 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), Capital Fund Program Plan, 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 2023-2024 MTW Plan to HUD.

**Passed and approved the 3rd day of April 2023.**

*Ana M. Guzman* 4/3/23  
Ana M. "Cha" Guzman  
Chair, Board of Directors

Attested and approved as to form:

  
\_\_\_\_\_  
Ed Hinojosa, Jr.  
President and CEO

**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 (07/01/2023), 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.

form HUD 50900: (I) Introduction (3/2021)



OMB Approval No. 2577-0216 (exp. 3/31/2024)

- (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 58 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 85.26 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.

Opportunity Home San Antonio

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**

Ed Hinojosa Jr.

4/14/2023

**SIGNATURE****DATE**

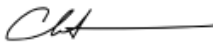
\* Must be signed by either the Chair or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing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

form HUD 50900: (I) Introduction (3/2021)



**Certification of Consistency  
with the Consolidated Plan**U.S. Department of Housing  
and Urban Development

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.  
(Type or clearly print the following information:)

Applicant Name: Opportunity Home San AntonioProject Name: Moving to Work Program - Initial MTW PHALocation of the Project: N/AName of the Federal  
Program to which the  
applicant is applying: N/AName of  
Certifying Jurisdiction: City of San AntonioCertifying Official  
of the Jurisdiction  
Name: Christopher LazaroTitle: Grants Administrator, Planning & Community Development DepartmentSignature: Date: 4/12/2023

## **Section VI. B. | Documentation of Public Process**

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





COSA - CITY CLERK  
2023 FEB 14 AM 08:40:12

## Public Notice of Public Hearing Regarding the Opportunity Home San Antonio Proposed 2023-2024 MTW Agency Plan

### Take notice that a 30-day public comment period

began on Tuesday, February 14, 2023, and ends on Tuesday, March 16, 2023, on the Opportunity Home San Antonio's Proposed 2023-2024 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.

Comments on changes may be delivered by electronic mail to [mtw@homesa.org](mailto:mtw@homesa.org). All comments are due by 5:00 pm on March 16, 2023.

### Take notice that a Public Hearing of the

Board of Commissioners will be held at Opportunity Home San Antonio, 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 2:00 p.m., commencing on March 15, 2023, to consider and act upon items shown on the attached agenda.

Documents are available for viewing online at [www.homesa.org](http://www.homesa.org).

**Dated:** February 14, 2023

Housing Authority of the City of San Antonio, Texas

DocuSigned by:  
  
07D48F73B134FA...

**Ed Hinojosa, Jr. | President and CEO**  
Opportunity Home San Antonio

Attachment

OPPORTUNITY HOME SAN ANTONIO | 818 S. Flores St. | San Antonio, TX 78204 | 210.477.6900 | [homesa.org](http://homesa.org)



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**OPPORTUNITY HOME SAN ANTONIO ACCESSIBILITY STATEMENT**

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

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Member of National Association of Housing and Redevelopment Officials  
Member of Public Housing Authorities Directors Association  
Member of Council of Large Public Housing Authorities  
Equal Housing Opportunity

005A - CITY CLERK  
2023 FEB 14 AM 08:40:16





**VIRTUAL**

**Number:** (346) 248-7799

**Meeting ID:** 93839434337#

**Passcode:** 654176#

**IN PERSON**

818 S. Flores St.

San Antonio, TX 78204

**BOARD OF COMMISSIONERS**

Dr. Ana "Cha" Guzmán  
Chair

Gabriel Lopez  
Vice Chair

Gilbert Casillas  
Commissioner

Dalia Contreras  
Commissioner

Loren D. Dantzer  
Commissioner

Olga Kauffman  
Commissioner

Ignacio Perez  
Commissioner

**PRESIDENT & CEO**

Ed Hinojosa, Jr.

COSA - CITY CLERK  
2023 FEB 14 AM 08:40:21

## OPERATIONS AND REAL ESTATE COMMITTEE MEETING OR SPECIAL BOARD MEETING

### PUBLIC HEARING

**2:00 p.m. | Wednesday | March 15, 2023**

If this meeting becomes a Special Board Meeting, at least four Commissioners will be physically present at this location, and up to three other Commissioners may attend by videoconferencing, as permitted by Tex. Gov't Code Section 551.127, and the Presiding Officer will also be present at this location.

### PROPOSED 2023-2024 MOVING TO WORK AGENCY PLAN AND PUBLIC HOUSING LEASE UPDATES

1. Introduction and Background (Richard Milk, Planning Officer)
2. Proposed 2023-2024 Moving to Work Agency Plan (Richard Milk, Planning Officer)
3. Moving to Work Plan (Richard Milk, Planning Officer)
  - Public Housing Admissions and Continued Occupancy Plan
  - Housing Choice Voucher Administrative Plan
  - Capital Fund Program Plan
  - Family Self-Sufficiency (FSS) Program Action Plan
4. Public Comments/Feedback
5. Summary and Next Steps (Richard Milk, Planning Officer)
6. Adjournment

"Pursuant to § 30.06, Penal Code, (trespass by holder license holder with a concealed handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not attend this meeting with a concealed handgun."  
"Pursuant to § 30.07, Penal Code, (trespass by holder license holder with an openly carried handgun), a person licensed under Subchapter H, Chapter 411, Government Code (handgun licensing law), may not attend this meeting with a handgun that is carried openly."



# Draft MTW Plan FY 2024

April 3, 2023



## Move to Work Designation

### Overview

Allows Opportunity Home to *improve the lives of our residents by providing quality affordable housing and building sustainable, thriving communities* in ways that are different than other PHAs

### MTW Toolbox

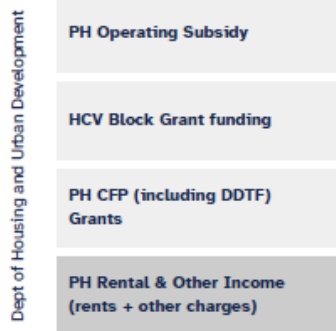
- 1 Regulatory Waivers
- 2 Funding Fungibility

Page 261 of 328

2

## Funding Fungibility

### MTW SOURCES OF FUNDS



### MTW USES OF FUNDS



## 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 Timeline

OCT. NOV. DEC. JAN. FEB. MARCH APRIL MAY JUNE JULY

## Planning

- Solicit resident feedback through strategic plan surveys
- Align MTW plan around priorities set by strategic plan, values, and evaluation results
- Coordinate with internal departments on
  - program policy updates
  - capital plans
  - housing expansion plans

## Public Comment

- Feb 14: Draft MTW Plan posted for 30-day public comment period
- March 15: Public Hearing scheduled during Operations and Real Estate Committee Meeting
- April: Consideration and approval by Board of Commissioners and submission to HUD

## HUD Approval & Implementation

- May - June: Address HUD questions
- July 1: Implement



Page 284 of 328

5

## Public Comment Period

# MTW Public Comment

- Feb. 14 – March 16, 2023
- Email comments to: [mtw@homesa.org](mailto:mtw@homesa.org)
- Mail comments to:  
**ATTN: Policy & Planning**  
**818 S. Flores St.**  
**San Antonio, TX 78204**
- Submit comments online:  
[homesa.org/public-notice](https://homesa.org/public-notice)



Page 285 of 328

6

## Outreach Plan

- **4 Resident Consultations**
  - a. 1 at Fair Ave
  - b. 1 at Resident Town Hall
  - c. 2 at Central Office
  - d. Hybrid - in person and virtual
  - e. Interpretation services
  - f. Times: 9 a.m., 12 p.m., 1:30 p.m., 6 p.m.
- **2 Landlord Consultations**
- **1 Partner Consultation**
- **3 Staff Consultations**
- **Online survey (English and Spanish)**
  - a. Emailed to PH and AHP with emails
  - b. Assistance with plan document translation offered
- **Video Recording Online**
- **Marketing**
  - a. Staff Weekly
  - b. Resident Newsletter
  - c. Social Media



#### Proposed New Activities

## FY2024 Proposed

The organization is proposing one new activity. This activity replaces FY2013-2, Simplified Earned Income Disregard (S-EID).



Page 286 of 328

## FY2024-1 Elimination of Earned Income Disregard

- New activity with the same MTW waiver that eliminates HUD's earned income disregard (EID)
- New activity also removes the alternative Opportunity Home Simplified EID version (S-EID)
- **DOES NOT IMPACT** Jobs Plus EID or FSS Escrows
- Income increases between triennial recertifications will not be processed

7

#### Changes to Activities

## Consolidation

The FY2020-3 FSS Streamlining waiver will be moved under FY2014-6 Rent Reform to streamlining reporting and re-group waivers working together.

The new FSS final rule eliminated the need for part of this activity. The remaining modified contract element is needed due to other program policy changes implemented under FY2014-6 Rent Reform activity.



Page 287 of 328

## FY2020-3 Family Self Sufficiency (FSS) Program Streamlining

8



#### Asset Management Plan

## Expansion

New Construction: Agency has over **5,000 units** in the expansion pipeline.

Tax-credit re-syndications: 7 currently planned



Page 288 of 328

## Preservation

Public Housing: Over next 5 years, plan to invest over **\$57 million** in capital repairs to extend the useful life at 26 properties and approximately **4,305 units**.

Beacon Communities: Plans to invest over **\$27 million** in capital repairs to extend the useful life at 30 properties and approximately **5,482 units**.

9

#### Advancing Equity

## Equity & MTW Plan

The organization is proposing to advance Equity in two ways:

1. New Equity Analysis for MTW activities
2. New definition of self-sufficient based on Equity principles



Page 289 of 328

## Section VI. C. Planned and Ongoing Evaluations

## Appendix G Proposed Alternative Definition to Self-Sufficiency

10

## Proposed ACOP Changes Public Housing



Page 290 of 328

1. Expanded definitions for waitlist purposes
2. Changes related to proposed MTW waiver changes
3. Added new relocation plan when families are displaced
4. Relaxed termination language to allow for case-by-case consideration
5. Added **up to 1 year** timeline for reinstatement consideration

11

## Proposed Admin Plan Changes Assisted Housing Programs



Page 291 of 328

1. Changes related to proposed MTW waiver changes
2. Added **Up to 1 year** timeline for reinstatement consideration
3. Added program language for New Foster Youth to Independence (FYI) Vouchers

12

# Proposed FSS Action Plan Changes

FSS Program



Page 292 of 328

No changes proposed

13

## Next Steps

### PUBLIC COMMENT PERIOD

- Feb. 14 – March 16, 2023
- Email comments to: [mtw@homesa.org](mailto:mtw@homesa.org)
- Mail comments to:  
**ATTN: Policy & Planning**  
**818 S. Flores St.**  
**San Antonio, TX 78204**
- Submit comments online:  
[homesa.org/public-notice](https://homesa.org/public-notice)



Page 293 of 328

### FEBRUARY

- Feb. 14: Comment period begins

### MARCH

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

### APRIL

- April 3: 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

14



## Questions + Feedback



**Website**  
homesa.org/public-notice



**Email**  
mtw@homesa.org



**Mail**  
ATTN: Policy & Planning  
818 S. Flores St.  
San Antonio, TX 78204



Page 294 of 328

15

### OUTREACH ACTIVITIES

**Surveys:** 12,860 to PH residents, HCV participants, and Landlords with emails on file

**Virtual/in-person Resident Briefing Meetings:** 5 meetings; 43 attendees

**Other efforts:** Digital signage, Social Media Promotion, and email blast



Page 295 of 328



## Section VI. C. | Planned And Ongoing Evaluations

### A. EQUITY IMPACT ANALYSIS DURING PLANNING PHASE

Opportunity Home will incorporate an equity impact analysis framework in the MTW activities design process. Through this equity lens, our design process is intended to include steps that seek to prevent institutional racism and identify ways the proposed MTW activities can remedy long-standing inequities. The additional steps and questions, as outlined below, have been sourced from internal conversations as well as toolkits developed by organizations leading equity work<sup>3</sup>. During the planning and evaluation process, these steps and questions will be used as a guiding framework.

#### Activity Description

- Identifying Stakeholders
  - Which racial/ethnic groups may be most affected by and concerned with the issues related to this proposal?
- Engaging Stakeholders
  - How can we keep stakeholders from different racial/ethnic groups—especially those most adversely affected—informed, meaningfully involved and authentically represented in the development of this proposal?
  - Who's missing and how can they be engaged?
- Identifying and documenting racial inequities
  - Which racial/ethnic groups are currently most advantaged and most disadvantaged by the issue the MTW activity is trying to address?
    - How are they affected differently?
    - What quantitative and qualitative evidence of inequality exists?
    - What evidence is missing or needed?
- Examining the causes
  - What factors may be producing and perpetuating racial inequities associated with this issue?
  - How did the inequities arise? Are they expanding or narrowing?
  - Does the proposed activity address root causes? If not, how could it?
- Clarifying the purpose
  - What does the proposed activity seek to accomplish?
  - What is the desired equitable outcome the activity wants to achieve?
  - Will the activity reduce systemic disparities or discrimination?
- Considering Adverse Impacts
  - What adverse impacts or unintended impacts could result from this activity?
  - Which racial/ethnic groups could be negatively affected?
  - How could adverse impacts be prevented or minimized?

#### Activity Metrics Information

- Will our metrics provide us with information on inequitable results or effects (i.e. are they

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<sup>3</sup> [https://www.raceforward.org/sites/default/files/RacialJusticeImpactAssessment\\_v5.pdf](https://www.raceforward.org/sites/default/files/RacialJusticeImpactAssessment_v5.pdf)  
<https://www.portland.gov/parks/documents/racial-equity-lens-and-empowerment-tool/download>

- disaggregated in a way that allows us to see gaps)?
- Will our metrics provide us with evidence of structural or systemic progress?

### **Communication & Resident Feedback Loops**

- How will Opportunity Home share information, opportunities, and data with those most impacted?
- How will Opportunity Home advance racial equity in its messaging?

## **B. EQUITY EVALUATION FRAMEWORK**

The evaluation framework to evaluate how equitable policies, programs, and practices are will closely follow the standard program evaluation framework. This framework, as described by the Center for Disease Control, has 6 critical steps<sup>4</sup>:

### **Step 1: Engage stakeholders.**

The evaluation's first step is to engage stakeholders. This includes the persons or organizations involved in the operations or implementation, the persons affected by the processes, policies, or programs, and the persons who will act on the evaluation findings.

From an equity lens, it is critical to engage the people most impacted, to get a deeper understanding of the equity impacts.

Questions to consider:

- Who are the stakeholders?
- Which stakeholders have historically been excluded?
- Will racial/ethnic groups who were most affected by and concerned with the issues related to this proposal be stakeholders?
- What role do they have in the evaluation (eg. draft evaluation questions, be sources of information, help interpret the findings and/or generate results)?
- Are there barriers to engagement?
- How will we remove barriers to engagement?
- How do we plan to engage the stakeholders (i.e. advisory board, project teams ,interviews, focus groups, etc)?

### **Step 2: Describe the program.**

Process, policy or program descriptions explain:

- Is a logic model available?
- Can a logic model be developed?
- What was the activity designed to address?
- Have key decision points been identified for the activity's processes?
- What were their expected outcomes?
- Who was involved in the design process?
- What resources were needed for implementation?

<sup>4</sup> <https://www.cdc.gov/mmwr/PDF/rr/rr4811.pdf>



- Were equity factors considered?
- What assumptions were made?

### **Step 3: Focus the evaluation design.**

Once the stakeholders are involved and the activity is understood, the next step is to identify the evaluation focus, the evaluation questions and how the findings will be used.

Possible evaluation questions:

- To what extent is the activity resulting in inequitable results?
- To what extent are decision points resulting in inequitable results?
- To what extent do all individuals have access to processes, policies or programs intended for them?
- How can the activity be redesigned to address equity issues?

Possible evaluation uses include:

- Demonstrate an activity's impact
- Improve activity to result in equitable results
- Inform decision to end or terminate activity

### **Step 4: Gather credible evidence.**

Once an evaluation focus and questions have been identified, we will explore appropriate methods and data.

Questions to consider:

- What data is available? And from what sources?
- What indicators have been developed?
- Has data been disaggregated by key demographics?
- Has data been disaggregated by key decision points?
- What is the quality of the data?
- Is the data trustworthy?
- Will various data be integrated (qualitative and quantitative) to have a better understanding?
- Are resident's lived experiences taken into consideration?
- What techniques, timing and infrastructure will be used for handling and gathering data?

### **Step 5: Interpret the data.**

After data is collected and analyzed, we will share the data with key stakeholders to help us interpret the data and generate appropriate recommendations.

Questions to consider:

- What is the story behind the numbers?
- Is the activity resulting in inequitable results?
- Are the decision points resulting in inequitable results?

- What strategies can be implemented to address inequities?
- Are changes to decision points needed to address inequities?
- What factors may be producing and perpetuating racial inequities associated with this issue?
- How did the inequities arise? Are they expanding or narrowing?
- Did the proposed activity address root causes?
- Did the proposed activity accomplish its purpose?
- Is the activity reducing systemic disparities or discrimination?
- How can the activity reduce systematic disparities or discrimination?
- What adverse impacts or unintended impacts, if any, resulted from this activity?
- Which racial/ethnic groups, if any, were negatively affected?
- How can adverse impacts be prevented or minimized?
- Will stakeholders help interpret the data?
- Will stakeholders help draft and or inform recommendations in response to the data?

### **Step 6: Ensure use and share lessons learned**

The final step is to communicate findings and recommendations to relevant audiences, discuss follow-ups, and translate new knowledge into appropriate action. This can result in changes to processes, policies, or procedures to ensure the activity is achieving equitable outcomes.

- How will Opportunity Home share findings and recommendations back to key stakeholders, especially racial/ethnic groups who are the most affected by and concerned with the issues related to this proposal?

### **C. Planned Evaluations**

During the upcoming fiscal year, the organization plans to conduct evaluations of specific activities during the upcoming fiscal year. Selection of activities scheduled to be evaluated during FY2024 will be completed by the end of the current fiscal year. Below is a list of activities that will be reviewed for evaluability. Depending on evaluation scope and resources, the organization plans to complete at least two evaluations.

1. FY2013-2- Simplified Earned Income Disregard (S-EID) (Public Housing)
2. FY2015-2- Elderly Admissions Preference at Select Public Housing Sites
3. FY 2020-3- Family Self Sufficiency (FSS) Program Streamlining
4. FY2022-1- Partnerships Providing Basic Needs for Residents Through Income Exclusions
5. FY2019-2- Alternate Recertification Process (PH and HCV)
6. FY2011-1e- Preservation and Expansion of Affordable Housing
7. FY2011-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services
8. FY2013-4- HQS Inspection of Opportunity Home properties by Opportunity Home inspectors
9. FY2014-3- Faster Implementation of Payment Standard Decreases (HCV)



10. FY2014-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)
11. FY2015-3- Modified Project Based Vouchers
12. FY2019-1- Local Implementation of SAFMR
13. FY2020-1- College & University Homeless Assistance Programs
14. FY 2021-1- Next Step Housing Program (THRU Project)
15. FY 2021-2- Limiting increases in rents
16. FY2023-1 Property-based local, non-traditional rental subsidy program (referred to locally as PH-like)



## Section VI. D. | Lobbying Disclosures

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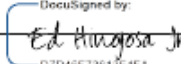
### DISCLOSURE OF LOBBYING ACTIVITIES

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.)

<b>1. Type of Federal Action:</b> <input 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	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Opportunity Home San Antonio (TX006) 818 S. Flores St. San Antonio, TX 78204 Congressional District, if known: 4c	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b> U.S. Department of Housing and Urban Development Office of Public and Indian Housing	<b>7. Federal Program Name/Description:</b> Moving to Work (MTW) Demonstration Program CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i> Not applicable	<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Not applicable	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	DocuSigned by:  Signature: _____ Print Name: Ed Hinojosa, Jr. Title: President and CEO Telephone No.: 210-477-6047 Date: 4/14/2023	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)



**Certification of Recipients  
to Influence Federal Transactions**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

Opportunity Home San Antonio

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

DocuSigned by:

Ed Hinojosa Jr

Date (mm/dd/yyyy)

4/14/2023

Previous edition is obsolete

form HUD 50071 (01/14)



## Appendix | Additional Items

[Appendix A | Public Comments Summary Report](#)

[Appendix B | Summary of Revisions to the Admissions & Continued Occupancy Policy \(ACOP\)](#)

[Appendix C | Summary of Revisions to the Administrative Plan](#)

[Appendix D | Summary of Revisions to the Family Self-Sufficiency \(FSS\) Action Plan](#)

[Appendix E | Asset Management Plan](#)

[Appendix F | Third-Party Lease Agreements](#)

[Appendix G | Proposed Alternative Definition to Self-Sufficiency](#)

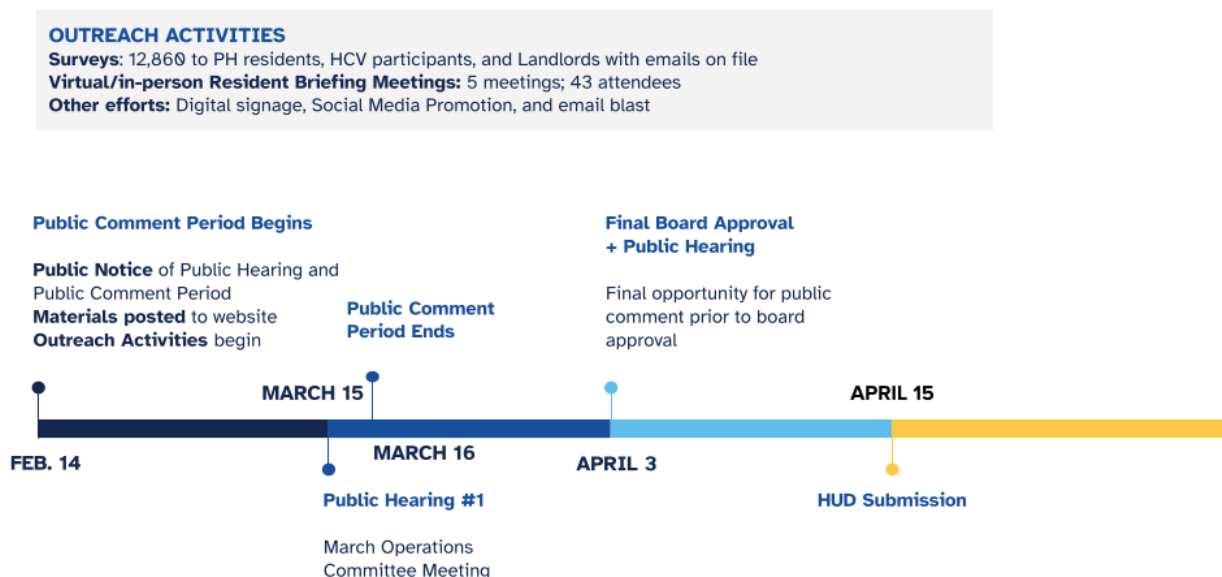


## Appendix A | Public Comments Summary Report

### Outreach Review

The goal of the Agency's outreach effort was to collect public comment on the proposed changes in the MTW plan.

Figure 1 | MTW Timeline and Outreach Activities



### Feedback Overview

The Agency received feedback from 154 people during the comment period. In general, most feedback was either positive or neutral. Neutral feedback was primarily driven by the design of the survey; 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 (ie, if more people were responding “Do not understand change” to specific program policies, then staff could ensure those were explained in detail during meetings).

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.

**Table 1 | Feedback Overview and Plan Adjustments**

Section	Number	Feedback Overview	Adjustments to Plan
<b>MTW Plan</b>	1. Elimination of EID	41% were supportive. 8% were opposed. 25% were not sure and 27% did not understand the change. 1% did not respond.	None.
	2. New equity analysis and equality evaluation framework	45% were supportive. 3% were opposed. 31% were not sure and 21% did not understand the change.	None.
	3. Alternative definition of self-sufficiency	59% were supportive. 6% were opposed. 25% were not sure and 10% did not understand the change.	None.
<b>ACOP - Public Housing</b>	4. Waitlist Disaster Definition	66% were supportive. 6% were opposed. 19% were not sure of the change and 6% did not understand the change. 2% did not respond.	None.
	5. Relocation Policy Updates	68% were supportive. 4% were opposed. 17% were not sure of the change and 9% did not understand the change. 2% did not respond.	None.
	6. Case-by-Case Evictions	62% were supportive. 6% were opposed. 20% were not sure of the change and 9% did not understand the change. 3% did not respond.	None.
<b>ADMIN Plan - Voucher Programs</b>	7. Foster Youth Independence Vouchers	60% were supportive. 5% were opposed. 23% were not sure of the change and 10% did not understand the change. 1% did not respond.	None.
<b>Both ACOP and Admin Plan</b>	8. 1 year reinstatement	55% were supportive. 5% were opposed. 31% were not sure of the change and 9% did not understand the change.	None.

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 FY2024 Moving-to-Work (MTW) Plan on March 15, 2023 during the Operations and Real Estate Committee Meeting. No community members signed-up to provide comments. Two commissioners asked follow-up questions. The following table provides a summarized list of questions and comments received during the meeting.

**Table 2 | Public Hearing Summary of Questions and Answers**

Number	Question / Comment	Staff Response(s)
1	Does this foster youth aspect already much in use?	The organization has applied for Foster Youth Initiative Vouchers and has not received notice of award. The proposed policy changes are in anticipation of an award. In addition, the organization has a special program for foster youth under the MTW Activity FY2021-1   Next Step Housing Program in partnership with the THRU Project. That program has 10 dedicated project-based vouchers allocated for this population.
2	Is not having utilities still a reason that a resident may be terminated?	One of the organization's priorities has been to ensure residents have access to affordable utilities. We are working with our partners at CPS and SAWS to help residents sign up and receive discounts on their utilities. In addition, we are identifying resources for residents experiencing difficulties being late on their utilities; and if we find out they are late on utilities, we are intervening and connecting them with the utility company. Currently, HUD requires residents to have utilities connected.

### Hybrid Resident Briefings

The Agency held four hybrid resident briefings on March 8 (6 p.m.), March 9 (12 p.m.), March 10 (9 a.m.), and March 13 (1:30 p.m.) for residents. A fifth briefing was held for landlords on March 17 (1:30 p.m.) Across the five meetings, there were 25 in-person attendees; and 18 online attendees. The following table provides a list of questions and comments addressed during the meetings.

**Table 2 | Resident Briefings Summary of Questions and Answers**

Number	Question / Comment	Staff Response(s)
1	Requested confirmation that recertifications are every three years and not two years	Yes, recertifications are every three years.
2	Who can I talk to about needing a larger bedroom size unit for my medical equipment?	Opportunity Home will provide direct assistance for this situation by directly working with the resident after the meeting.
3	Are we still using the comment cards?	Opportunity Home will revisit the use of comment cards and determine whether we are still using them and ensure all residents are aware of how they can submit customer service feedback.

4	QR code - I do not understand what this is? A lot of places in the community are using it. I don't know how to scan this, my phone does not have this capability. Email urgent concerns - resident does not have email either due to scams and other issues.	Opportunity Home's intention of using the QR code is to offer additional ways of accessing information and is not meant to be the only way or an exclusive way of distributing information.
5	Do services offered extend to those with vouchers?	The FSS program is available for those with vouchers. If residents have a need, they should reach out to the case manager to get connected with referral services.
6	Is there a delay in processing recertifications for section 8 vouchers? I have been waiting 3 months for my voucher.	The organization is experiencing a delay - we will connect with you privately to give an update on the status of your recertification. Opportunity Home apologizes for the delay.
7	I was wondering if reporting change of income can be extended from ten days to thirty days? Reason being is that sometimes job offers can either fall through, the job could be temporary and/or it takes longer than ten days to have income in the household.	Opportunity Home will review policies and procedures to see if this is something we can do. Residents can reach out directly if an extension is needed. Changes of income for voucher program - you do not have to report increases except for at the time of recertification or move (except for FSS participants); The ten day requirement is applied when a resident's income decreases. This allows the organization to process the change as quickly as possible so the rent can be reduced accordingly.
8	Can I get the formula that determines my rent amount? How are utility allowances calculated?	Opportunity Home explained rent and utility allowance calculation methods to the resident after the presentation. Residents can find more information on calculation methods here: <a href="https://homesa.org/housing/find-a-home/vouchers/housing-assistance-payments/">https://homesa.org/housing/find-a-home/vouchers/housing-assistance-payments/</a>

## Surveys

A survey titled "We want to hear from you!" was prepared and posted online on February 14, 2023. On February 20, an English and Spanish translated version were sent directly to residents



and on March 8, 2022 the survey was posted to the Landlord corner and sent to 1,332 landlords. The survey was delivered using an emailed google form and a paper form was provided upon request.

Each question described the policy change, provided a link to the relevant plan pages, and then asked respondents to provide their feedback using multiple choice. 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 16, 2023.

## Delivery and Response Statistics

**Table 3 | Delivery Statistics**

Target Population	Sent
Public Housing Residents	1,919
Housing Choice Voucher Residents	9,609
Landlords	1,332
<b>TOTAL</b>	<b>12,860</b>

**Table 4 | Responses by self-identified stakeholders**

Self-identified SAHA Housing Program	Responses	Response (%)
Public Housing Resident	57	37.0%
Housing Choice Voucher Resident	90	58.4%
Housing Applicant	3	1.9%
Landlord	1	0.6%
Partner	0	0.0%
Community Member	2	1.3%
Other Stakeholder	1	0.6%
<b>TOTAL</b>	<b>154</b>	<b>100.0%</b>

## Topics

The following topics were covered by the survey:

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

## Response Options

The survey allowed respondents to answer “Not Sure” and “Did not understand the change” ; 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:

## Results

A total of 1,220 non-blank individual question responses were received across the 154 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.

<span style="color: red;">■</span>	Strongly Oppose
<span style="color: orange;">■</span>	Oppose
<span style="color: lightgreen;">■</span>	Support
<span style="color: green;">■</span>	Strongly Support
<span style="color: gray;">■</span>	Not sure
<span style="color: lightgray;">■</span>	Do not understand the change

Of the responses received, 57.7% or 704 responses indicated their support for the policy change. 24.1% or 294 responded not sure, indicating they had no opinion of the change. 12.87% or 157 responses indicated they did not understand the policy change. Responses indicating they did not support the policy change made up 5.33 % or 65 responses.

**Table 5 | Summary results for all question responses**

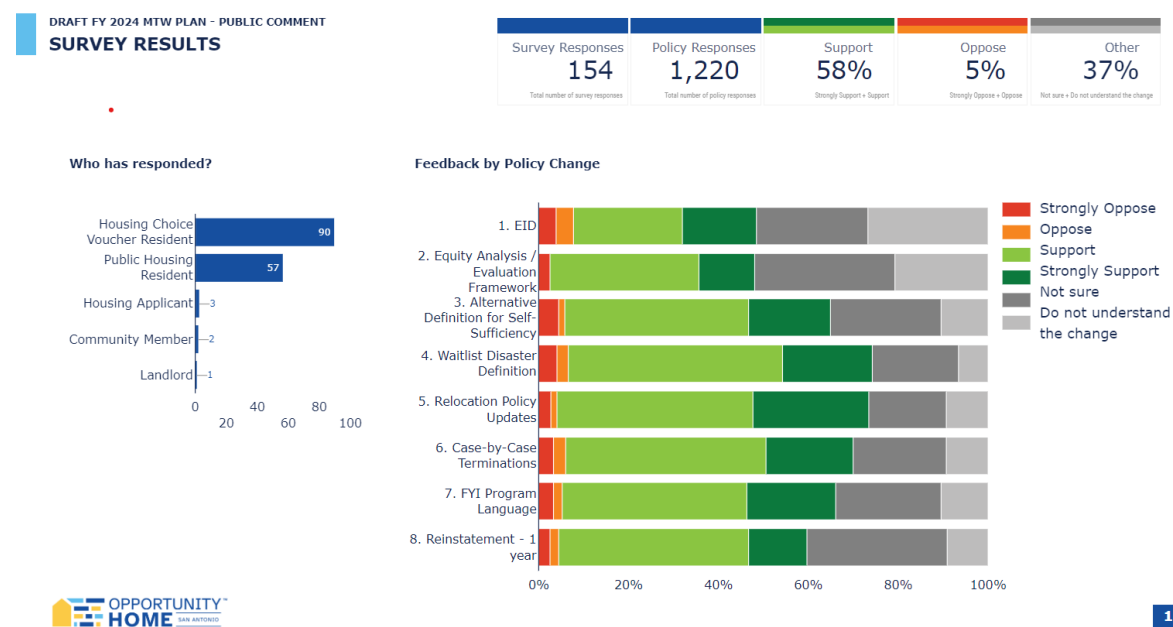
Response Category	Responses	Response (%)
Strongly Oppose	41	3.36%
Oppose	24	1.97%
Support	484	39.67%
Strongly Support	220	18.03%
Not Sure	294	24.10%
Do not understand the change	157	12.87%
No Response	12	0.97%
<b>TOTAL</b>	<b>1232</b>	<b>100%</b>

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

**Table 6 | Summary results by policy**

Question	Strongly Oppose		Oppose		Support		Strongly Support		Not Sure		Do not understand the change	
	#	%	#	%	#	%	#	%	#	%	#	%
1. Elimination of EID	6	4%	6	4%	37	24%	25	16%	38	25%	41	27%
2. New equity analysis and equality evaluation framework	4	3%	0	0%	51	33%	19	12%	48	31%	32	21%
3. Alternative definition of self-sufficiency	7	5%	2	1%	63	41%	28	18%	38	25%	16	10%
4. Waitlist Disaster Definition	6	4%	4	3%	72	48%	30	20%	29	19%	10	7%
5. Relocation Policy Updates	4	3%	2	1%	66	44%	39	26%	26	17%	14	9%
6. Case-by-Case Evictions	5	3%	4	3%	67	45%	29	19%	31	21%	14	9%
7. Foster Youth Independence Vouchers	5	3%	3	2%	63	41%	30	20%	36	24%	16	10%
8. 1 Year reinstatement	4	3%	3	2%	65	42%	20	13%	48	31%	14	9%

**Figure 2 | Summary Results**



## Survey Questions

### We want to hear from you!

Please provide your feedback on the policy changes we will be submitting to the U.S. Department of Housing and Urban Development (HUD) for approval. Your feedback will help us know if we're on the right track.

Please know, this is an anonymous and voluntary survey. It will not affect your application status or participation in any Opportunity Home San Antonio programs.

If you have any questions or concerns, please send them to [MTW@homesa.org](mailto:MTW@homesa.org).

#### 1. Please select the option below that best applies to you.

- ☐ Public Housing Resident
- ☐ Housing Choice Voucher Resident
- ☐ Housing Applicant
- ☐ Landlord
- ☐ Partner
- ☐ Community Member
- ☐ Other stakeholder

## Section A

### MTW Changes

Opportunity Home is proposing one new activity as part of the annual MTW plan. These changes would apply to both **Public Housing residents** and **Assisted Housing Programs (AHP) (such as Section 8) only**.

**For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "Not Sure".**

2. **Opportunity Home is proposing to close out the current simplified earned income disregard and replace this policy with the elimination of earned income disregard (EID). The simplified version has been phased out over the last two years and currently there are no households on this version.** This change will keep the existing MTW waiver to eliminate the HUD EID and remove the simplified version established in 2014. This change will not impact FSS participants' escrows or Jobs Plus Program EID. ([see here for more details](#))

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support



- ☐ Not Sure
- ☐ Do not understand the change

**3. Opportunity Home is proposing to advance equity through the MTW Plan by adding a new equity analysis and equity evaluation framework. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

**4. Opportunity Home is proposing to define self-sufficiency based on equity principles to include measures of housing stability and quality of life. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

## Section B

### **Public Housing Policy Changes in the Admissions and Continued Occupancy Plan (ACOP)**

Opportunity Home is proposing changes to the Admissions and Continued Occupancy Policy (ACOP). The ACOP **applies to Public Housing residents/applicants only.**

For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "Not Sure".

**5. Opportunity Home has expanded the definition of “disaster” for waitlist purposes to ensure applicant families affected by an officially declared disaster in addition to natural disasters will be eligible for the wait list preference. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support



- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

**6. Opportunity Home has added a new policy that outlines guidelines established for Opportunity Home to carry out when families are displaced due to the rehabilitation, redevelopment, or demolition of Public Housing residences; or termination of a Housing Choice Voucher Program Landlord. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

**7. Opportunity Home has added language to update the terminations policy to allow for more terminations to be considered on a case-by-case basis. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

## Section C

### **Housing Choice Voucher Policy Changes in the Administrative Plan**

Opportunity Home is proposing changes to the Housing Choice Voucher Administrative Plan. The Administrative Plan **applies to Assisted Housing Programs (AHP) (such as Section 8) only.**

**For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "Not Sure".**

**8. Opportunity Home has added a new section to Chapter 20 with policies applicable to a new housing program called Foster Youth Independence (FYI) vouchers. ([see here for more details](#))**



- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

## Section D

### **Public Housing Policy Changes in the Admissions and Continued Occupancy Plan (ACOP) AND Housing Choice Voucher Policy Changes in the Administrative Plan**

Opportunity Home is proposing changes to the Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Administrative Plan. These changes would apply to both **Public Housing residents/applicants** and **Assisted Housing Programs (AHP) (such as Section 8) only**.

**For each of the following, please indicate how much you support or oppose the proposal. If you do not know or have no opinion, please mark "Not Sure".**

- 9. Opportunity Home has added language related to terminations that clarifies Opportunity Home will only consider requests for reinstatement made within one year of a family's termination. This language is added to align with the one year appeals deadline in the court of law. ([see here for more details](#))**

- ☐ Strongly Oppose
- ☐ Oppose
- ☐ Support
- ☐ Strongly Support
- ☐ Not Sure
- ☐ Do not understand the change

**Thank you for providing your feedback!**



## Appendix B | Summary of Revisions to the Admissions & Continued Occupancy Policy (ACOP)

Indicates policy has been added

~~Indicates policy has been removed~~

### Reason for Changes to Natural Disaster Preference

This policy update is to ensure that families affected by officially declared disasters in addition to natural disasters will be eligible for the preference.

#### 4.3.B SELECTION METHOD

\*\*\*

##### (2) Local Preferences [24 CFR 960.206]

(a) Opportunity Home is permitted to establish local preferences and to give priority to serving families that meet those criteria.

\*\*\*

\*\*\*

- (ii) ~~Natural Disaster~~ Emergency or Major Disaster (75 Points) - Extended to families that are involuntarily displaced due to an officially declared emergency or major disaster (natural or man-made) ~~(fire, flood, hurricane, earthquake, etc.)~~ within the last six months as verified by referral from an approved agency, including but not limited to, the American Red Cross or the Federal Emergency Management Agency (FEMA).

\*\*\*

### Reason for change to Single Family Referral Preference



4.3.B(2)(g)(i) was updated to expand the preference to allow for referred individuals to be offered one-bedroom units in addition to efficiency units.

\*\*\*

(g) **Waiting List Preferences**

Applicants will retain the assigned points throughout the waiting list, eligibility and offer process.

- (i) **Single Family Referral (100 Points)** - Single persons referred to Opportunity Home under the terms and conditions of a Memorandum of Agreement with a certifying social service agency, such as Haven for Hope, to receive an available efficiency or one-bedroom unit [24 CFR 960.206(b)(5)]. Individuals must meet at least one of the following criteria:

- (A) Elderly (age 62 or older);
- (B) Displaced;
- (C) Homeless; or
- (D) Persons with disabilities.

\*\*\*

**Reason for change to Earned Income Disregard**

6.1.E(1)(d) was updated to reflect the close out of FY2013-2 and align with the new MTW activity in its place, FY2024-1: Elimination of Earned Income Disregard.

\*\*\*

- (d) Per MTW Activity "~~FY2013-2: Simplified Earned Income Disregard (EID);~~ FY2024-1: Elimination of Earned Income Disregard" Opportunity Home will not disregard earned income for MTW participants using the traditional EID calculation.

**Reason for change to the policy regarding changes affecting income or expenses**



This change will allow families to become increasingly self-sufficient by not requiring they report increases in income and therefore not increasing their rent until their next annual recertification.

### 9.3.C

\*\*\*

#### (3) Family-Initiated Interim Reexaminations

(a) Opportunity Home must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 960.257(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 960.257(b)]

\*\*\*

#### (b) **Required Reporting**

(i) HUD regulations give Opportunity Home the discretion to determine the circumstances under which families will be required to report changes affecting income.

~~(A) Families are not required to report increases under \$200 in earned and unearned income, including new employment. FSS Participants, EID Participants, JPEID Participants and Zero-Income Participants are required to report all increases in earned and unearned income within 10 business days of the date the change takes effect. Families are not required to report increases in earned and unearned income, including new employment.~~

~~(B) FSS Participants, EID Participants, JPEID Participants, and Zero-Income Participants are required to report all increases in earned and unearned income within 10 business days of the date the change takes effect.~~

~~(B) Opportunity Home will not process increases in income under \$200 in earned and unearned monthly income, including new employment.~~

~~(C) Opportunity Home will process all increases in earned and unearned income for FSS Participants, EID Participants, JPEID Participants and Zero-Income Participants.~~



## **Reason for the addition of the Opportunity Home Relocation Policy**

The addition of this policy is to ensure that there are clear guidelines established for Opportunity Home to carry out when families are displaced due to the rehabilitation, redevelopment, or demolition of Public Housing residences; or termination of a Housing Choice Voucher Program Landlord.

### **12.2.E RELOCATION PLAN**

(1) This relocation policy will be utilized by Opportunity Home staff when Opportunity Home families are relocated due to demolition, redevelopment, rehabilitation, or termination of a Housing Choice Voucher Program landlord.

(b) Residents that are relocated may request reasonable accommodations for any disability-related needs in accordance with Exhibit 2.2: Reasonable Accommodation Policies and Procedures of this ACOP.

#### **(2) Relocation Planning (49 CFR 24.205(a))**

(a) Opportunity Home will ensure that all reasonable efforts will be made to minimize displacement of residents. Families will be provided a unit that is affordable, decent, safe, and sanitary.

##### (b) Rehabilitation Projects

(i) Opportunity Home will provide families the opportunity to transfer to another Public Housing community that meets the needs of the resident. Families impacted by the rehabilitation project will be offered first priority when work is completed.

##### (c) Redevelopment Projects

(i) Opportunity Home will provide families the opportunity to transfer to another Public Housing community or receive a Housing Choice Voucher. If the family elects to receive a Housing Choice Voucher, they must meet all eligibility requirements of the program.

(d) If necessary, Opportunity Home will consider the feasibility of phasing the rehab or redevelopment phases to reduce the number of families having to be relocated at a time.



(e) Opportunity Home will continue to evaluate and modify staffing based on the families' needs during a relocation project to ensure they are provided adequate support. The overall budget of the projects will include family relocation assistance.

**(3) Relocation Notices (49 CFR 24.203)**

(a) Opportunity Home will adhere to the Uniform Relocation Act and HUD Policies in notifying families of the rehabilitation, relocation or termination of a Housing Choice Voucher Landlord.

(b) All notices will be provided by mail and through additional means by email, phone and/or direct fliers to the family's residence through the duration of the project.

(c) All notices will be provided in both English and Spanish or other forms of communication in accordance with Section 2.3 of this ACOP.

(d) Opportunity Home will provide appropriate HUD brochures to families at the beginning of the proposed project.

**(e) Notice of Intent to Acquire**

(i) Opportunity Home will provide notice to families to be displaced, including those to be displaced by rehabilitation or demolition activities, prior to the commitment of federal financial assistance to the activity.

(ii) The notice will establish eligibility for relocation assistance prior to the initiation of negotiations and/or prior to the commitment of federal financial assistance (See 49 CFR 24.203(d), §24.2(a)(9)(i)(A)).

**(f) Notice of Relocation Eligibility**

(i) Eligibility for relocation assistance shall begin on the date of a notice of intent to acquire (described in §24.203(d)), the initiation of negotiations (defined in §24.2(a)(15)), or actual acquisition, whichever occurs first.

(A) When this occurs, the Agency shall promptly notify all occupants in writing of their eligibility for applicable relocation assistance.

(ii) Opportunity Home will notify families of their relocation eligibility after receiving Board of Commissioner and/or HUD approval of the proposed project. The notice will

outline the assistance the family may be eligible to receive, including program and relocation assistance options, and any next steps.

**(g) General Information Notice (49 CFR 240.203(a))**

As soon as feasible, Opportunity Home will notify families to be displaced with a general notice that provides the following information:

- (i) Informs the family that they may be displaced for the project and generally describes the relocation payment(s), the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- (ii) Informs the family that they will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the displaced person successfully relocate;
- (iii) Informs the family that they will not be required to move without at least 90 days advance written notice and informs the family that they cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- (iv) Informs the family that any person who is an ineligible citizen is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child, as defined in §24.208(h); and
- (v) Describes the family's right to appeal Opportunity Home's determination as to a person's eligibility for relocation assistance.

**(h) Notice of Relocation**

- (i) Opportunity Home will use a 90-day written notice to advise impacted families of when they will be required to move.
  - (A) The 90-day notice will either specify a specific date by which the family may be required to move or state that the family will receive a further notice indicating, at

least 30 days in advance, the specific date by which the family must move.

(B) If the 90-day notice is issued before a comparable replacement dwelling is made available, the notice must state clearly that the occupant will not have to move earlier than 90 days after such dwelling is made available (see § 24.204(a).

(ii) Opportunity Home will issue additional notice in the form of 60-day and 30-day notices to advise impacted families of the upcoming deadline to move.

(iii) In unusual circumstances, a family may be required to vacate the property on less than 90 days advance written notice if Opportunity Home determines that a 90-day notice is impracticable, such as when the family's continued occupancy of the property would constitute a substantial danger to health or safety. A copy of the Opportunity Home's determination will be included in the family's resident file.

**(4) Relocation Advisory Services (49 CFR §24.205)**

(a) Opportunity Home will contact each impacted family to discuss their needs, costs, preferences and concerns. Opportunity Home will document all communication with the families to ensure proper follow up.

**(b) Coordination**

(i) Opportunity Home will continue to partner with agencies in the San Antonio community to coordinate families' needs and ensure a smooth transition during the relocation process.

**(c) Consultation with Families**

(i) Opportunity Home will meet with families prior to seeking approval of rehabilitation or redevelopment of communities that require relocation. Upon approval of the proposed projects, Opportunity Home will continue to meet with families on a regular basis to allow them the opportunity to ask questions and provide feedback on the project, and for Opportunity Home staff to provide updates. Meetings will be scheduled at different times

and days to provide multiple opportunities for families to attend.

**(d) Determining Resource Needs**

- (i) Opportunity Home will conduct on-site assessments to determine each family's needs. Assessments will be on-going to ensure families' needs, such as relocation payments and connection to local resources, are met prior, during and after relocation.
- (ii) During assessments, Opportunity Home will inform families of:
  - (A) Any potential eligibility requirements for relocation and/or the replacement dwelling, and procedures for obtaining such assistance;
  - (B) Current and continuing information on the availability, purchase prices, and rental costs of comparable replacement dwellings;
  - (C) Information that the family cannot be required to move unless at least one comparable replacement dwelling is made available (49 CFR §24.204(a)).

**(e) Services to be Provided**

- (i) Where feasible, the replacement dwelling shall be inspected prior to being made available to assure that it meets applicable standards (49 CFR §24.2(a)(8)).
  - (A) If such an inspection is not made, the Agency will notify the family that a replacement housing payment may not be made unless the replacement dwelling is subsequently inspected and determined to be decent, safe, and sanitary.
- (ii) Opportunity Home will offer all persons transportation to inspect housing to which they are referred.

**(5) Relocation Payments (49 CFR 24.301(a))**

- (a) Opportunity Home families will be provided the following options for relocation assistance payments:
  - (i) Opportunity Home will pay the contractor to move the families to a new unit. Families will not receive any direct payment.

(ii) Families will provide Opportunity Home receipts from their move. Opportunity Home will review the receipts and determine if the costs were reasonable. Families will be reimbursed for reasonable expenses after they move into the new unit.

(iii) Opportunity Home will provide the family a relocation payment based on URA published rates. Payments will be made available when the family has accepted a new Public Housing unit or has submitted the Request for Tenancy Approval in the Housing Choice Voucher Program.

### **Reason for Changes to Termination Policies**

The language in the following policies was updated to allow for terminations to be considered on a case-by-case basis when possible. The language was changed from “... *will* result in termination of tenancy” to “*may* result.”

A new section was created in 13.3.C(2) to indicate that some lease violations *may* result in termination of tenancy.

#### **13.3.B(8)**

**(8) Other Serious or Repeated Violations of Material Terms of the Lease – Mandatory Lease Provisions [24 CFR 966.4(l)(2)(i) and 24 CFR 966.4(f)]**

- (a) HUD regulations require certain tenant obligations to be incorporated into the lease. Violations of such regulatory obligations are considered to be serious or repeated violations of the lease and grounds for termination. Incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking [24 CFR 5.2005(c)(1)].

~~Opportunity Home will terminate the lease for t~~The following violations of tenant obligations under the lease are considered serious violations and may result in termination of tenancy:

- (b) Failure to make payments due under the lease, including nonpayment of rent (see Chapter 8 for details pertaining to lease requirements for payments due);
- (c) Repeated late payment of rent or other charges. Four late payments within a 12-month period shall constitute a repeated late payment.
- (d) Failure to fulfill the following household obligations that results in three lease violations in a 12-month period:
  - (i) Not to assign the lease or to sublease the dwelling unit. Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member;
  - (ii) Not to provide accommodations for boarders or lodgers;
  - (iii) To use the dwelling unit solely as a private dwelling for the tenant and the tenant's household as identified in the lease, and not to use or permit its use for any other purpose;
  - (iv) To abide by necessary and reasonable Opportunity Home regulations for the benefit and well-being of the housing project and the tenants which shall be posted in the project office and incorporated by reference in the lease;
  - (v) To comply with all obligations imposed upon tenants by applicable provisions of building and housing codes materially affecting health and safety;
  - (vi) To keep the dwelling unit and such other areas as may be assigned to the tenant for the tenant's exclusive use in a clean and safe condition;
  - (vii) To dispose of all ashes, garbage, rubbish, and other waste from the dwelling unit in a sanitary and safe manner;
  - (viii) To use only in a reasonable manner all electrical, plumbing, sanitary, heating, ventilating, air-conditioning and other facilities including elevators;
  - (iv) To refrain from, and to cause the household and guests to refrain from destroying, defacing, damaging, or removing any part of the dwelling unit or project;
  - (x) To pay reasonable charges (other than for normal wear and tear) for the repair of damages to the dwelling unit, or to the project (including damages to project buildings, facilities or common

areas) caused by the tenant, a member of the household or a guest; and

- (xi) To act, and cause household members or guests to act, in a manner which will not disturb other residents' peaceful enjoyment of their accommodations and will be conducive to maintaining the project in a decent, safe and sanitary condition.

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### 13.3.C(2)

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

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Opportunity Home **will** terminate the lease for the following reasons:

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- ~~(xiii)~~ (vi) If Opportunity Home is notified of any household member convicted for engaging in any criminal activities as defined in Opportunity Home's Screening Criteria Grid in 3.3.E.

The following are considered serious violations and **may** result in termination of tenancy:

- (vi) Failure to transfer to an appropriate size dwelling unit based on family composition when required by Opportunity Home and upon appropriate notice when such a dwelling unit is available.
- (vii) Failure to permit access to the unit by Opportunity Home after proper advance notification for the purpose of performing routine inspections and maintenance, for making improvements or repairs, or to show the dwelling unit for re-leasing, or without advance notice if there is reasonable cause to believe that an emergency exists
- ~~(viii)~~ ix) Failure to promptly inform Opportunity Home in writing of the birth, adoption or court-awarded custody of a child. In such a case, promptly means within 10 business days of the event.
- (ix) Failure to abide by the provisions of Opportunity Home pet policy

- (xi) If the family has breached the terms of a repayment agreement entered into with Opportunity Home
- (xii) If a family member has violated federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.
- (xii) If a household member has engaged in or threatened violent or abusive behavior toward Opportunity Home personnel.
  - (A) *Abusive or violent behavior* towards Opportunity Home personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.
  - (B) *Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.
- ~~(xiii) If Opportunity Home is notified of any household member convicted for engaging in any criminal activities as defined in Opportunity Home's Screening Criteria Grid in 3.3.E.~~
- (e) In making its decision to terminate the lease, Opportunity Home will consider alternatives as described in Section 13.3.D and other factors as described in Sections 13.3.E and 13.3.F. Upon consideration of such alternatives and factors, Opportunity Home may, on a case-by-case basis, choose not to terminate the lease.

### **Reason for changes to Grievance Procedure Policy**

This update is to clarify that families terminated from the program have up to one year to request reinstatement. This includes families who had an adverse action upheld via an informal hearing decision or failed to request one.

### **14.3.E PROCEDURES TO OBTAIN A HEARING**

#### **(1) Requests for Hearing and Failure to Request**



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(c) If the complainant does not request a hearing in accordance with the Opportunity Home Grievance Procedure, Opportunity Home's disposition of the grievance under the informal settlement process will become final. However, failure to request a hearing does not constitute a waiver by the complainant of the right to contest Opportunity Home's action in disposing of the complaint in an appropriate judicial proceeding.

(d) Opportunity Home will only consider requests for reinstatement to the program made within one year of the family's lease termination.



## Appendix C | Summary of Revisions to the Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

### Foster Youth to Independence Referral

#### Reason for the Change to 4.3.C Selection Method

This section was updated to include referral information for the new Foster Youth to Independence (FYI) voucher program.

#### 4.3 SELECTION FOR HCV ASSISTANCE

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##### 4.3.C SELECTION METHOD

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(iii) Foster Youth to Independence (FYI) Referral (75 Points) – Youth between the ages of 18 and 24 with a current or prior history of child welfare involvement referred by a partnering public child welfare agency.

~~(iv)~~ **(vii) Palo Alto Set Aside Referral (75 Points)** – Homeless students referred by Palo Alto Community College who are currently enrolled in at least six (6) credit hours at Palo Alto College in a degree or certificate program.

~~(iv)~~ **5-Year Mainstream Participants (75 Points)** – 238 applicant families on the tenant-based voucher waiting list, who have a household member between the ages of 18 and 61 with a disability, will be certified and referred by a designated social service agency currently partnered with Opportunity Home.

~~(vi)~~ **Opportunity Home Program Displacement (70 Points)** –

(A) Participants in “good standing” at a Opportunity Home public housing community or a Opportunity Home housing assistance program who will be displaced through no fault of their own; or



(B) Participants in the Project-Based Voucher program who require an emergency transfer through Violence Against Women Reauthorization Act of 2013 procedures [24 CFR 983.261].

(vi) **Voucher Program Return (40 Points)** – Former participants under the tenant based Housing Choice Voucher Program whose assistance was terminated because Opportunity Home did not have sufficient federal funding to continue to provide rental assistance.

## **FY2013-2 Simplified Earned Income (EID) MTW Activity Closeout**

### **Reason for the Change to 6.1 Annual Income**

Language was updated to reflect the close out of FY2013-2 Simplified Earned Income (EID) MTW Activity. FY2024-1 simplifies traditional EID rules beyond those of FY2013-2.

#### **6.1 ANNUAL INCOME**

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#### **6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]**

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(ii) Per MTW Activity ~~“FY2013-2: Simplified Earned Income Disregard (EID),”~~ “FY2024-1: Elimination of Earned Income Disregard,” Opportunity Home will not disregard earned income for MTW participants using the traditional EID calculation.

## **Reinstatement After Termination**

### **Reason for the Change to 12.2 Approach to Termination Assistance**



This section was updated to clarify that Opportunity Home will only consider requests for reinstatement made within one year of a family's termination. This language is added to align with the one year appeals deadline in the court of law.

## 12.2 APPROACH TO TERMINATION OF ASSISTANCE

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### 12.2.F TERMINATION NOTICE

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- (4) When Opportunity Home initiates a termination, Opportunity Home will send the family a notice of intent to terminate assistance at least 30 calendar days prior to the effective date of the termination, except when the termination is for:
  - (a) An eviction, or
  - (b) Vacating without notice.
- (5) When Opportunity Home initiates a termination because the family vacated or was evicted from the unit, the notice of intent to terminate will be sent immediately upon receiving notice of the program violation.
- (6) Opportunity Home will also send forms HUD-5380 and HUD-5382 to the family with the termination notice.
- (7) When a family requests to be terminated from the program they must do so in writing to Opportunity Home (see Section 12.1.C). Opportunity Home will send a confirmation notice to the family and the owner no later than the termination effective date (as requested by the family).
- (8) If the family does not request a hearing to appeal their termination within 10 business days, Opportunity Home will send the owner/landlord a final notification of termination.
- (9) Opportunity Home will only consider requests for reinstatement to the program made within one year of termination.

## Foster Youth to Independence (FYI) Vouchers

### Reason for the Change to Chapter 20

Opportunity Home is acquiring up to 25 vouchers through the Foster Youth to Independence (FYI) initiative. These FYI vouchers provide housing assistance on behalf



of youth referred by a public child welfare agency (PCWA) who are at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act, and are homeless or are at risk of becoming homeless at age 16 or older. Youth must be provided supportive services to assist the young person on their path to self-sufficiency.

## **CHAPTER 20: ~~EMERGENCY HOUSING VOUCHERS~~ SPECIAL PURPOSE VOUCHERS**

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### **20.2 FOSTER YOUTH TO INDEPENDENCE (FYI) VOUCHERS**

#### **20.2.A OVERVIEW**

- (1) Through the Foster Youth to Independence (FYI) initiative, HUD provides Housing Choice Vouchers (HCVs) for youth eligible under the Family Unification Program (FUP).
- (2) On September 3, 2021, HUD issued Notice PIH 2021-26, which described HUD's funding and availability of FYI vouchers and set forth the operating requirements for PHAs that administer them. The FYI Program is for youth with a current or prior history of child welfare involvement.
- (3) The Further Consolidated Appropriations Act, 2020 (Public Law 116-94), enacted on December 20, 2019, provides that up to \$10 million shall be available on a non-competitive basis to PHAs that partner with public child welfare agencies (PCWAs) for FUP-eligible youth under Section 8(x) of the U.S. Housing Act of 1937 (42 U.S.C. 1437f(x)).
- (4) All applicable nondiscrimination and equal opportunity requirements apply to FYI vouchers, including requirements that the PHA grant reasonable accommodations to persons with disabilities, effectively communicate with persons with disabilities, and ensure meaningful access for persons with limited English proficiency (LEP).
- (5) Except as addressed by this chapter and as required under federal statute and HUD requirements, the requirements of the HCV program apply to FYI vouchers.

#### **20.1.A PROGRAM ADMINISTRATION**

##### **(1) Term of Assistance**

- (a) FYI vouchers may only be used to provide housing assistance for youth for a maximum of 36 months.
- (b) Youth may be eligible to receive an extension of their voucher assistance for up to 24 months beyond the 36 month time limit if they:



- i) Participate in an FSS Program;
  - ii) Are unable to enroll in an FSS program, but are engaged in education, workforce development, or employment activities for at least 9 months of the 12-month period preceding the extension;
  - iii) If they are responsible for the care of a dependent child under the age of six or for the care of an incapacitated person; regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program;
  - iv) Are incapable of complying with the requirement to participate in an FSS program or engage in education, workforce development, or employment activities, as applicable, due to a documented medical condition.
- (c) Families cannot be required to participate in the FSS program as a condition of the FYI voucher program.

**(2) Rent Calculation**

- (a) Participants admitted to this program 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.
- (b) See 6.3.A(2)(c) for rent calculation requirements under the program.

**(3) Youth Eligibility**

- (a) The partnering public child welfare agency (PCWA) is responsible for certifying that the youth:
  - i. Has attained at least 18 years and not more than 24 years of age at the time the PCWA certifies them eligible or at the execution of the HAP contract;
  - ii. Left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act;
  - iii. Is homeless or is at risk of becoming homeless at age 16 or older.
- (b) Eligibility is not limited to single persons. Opportunity Home may not exclude pregnant or parenting youth from service. Any pregnant or parenting youth who otherwise meets the definition of youth must be served.

**(4) Organization of the Waiting List**



- (a) Opportunity Home, upon receipt of a referral(s) from the PCWA of an eligible youth, must compare the name(s) with youth already on the HCV waiting list.
- (b) Any youth on the Opportunity Home HCV waiting list that matches with the PCWA's referral must be assisted in order of their position on the waiting list in accordance with Opportunity Home admission policies.
- (c) Any youth certified by the PCWA as eligible and not on the HCV waiting list must be placed on the waiting list (pending HCV eligibility determination).
- (d) If the Opportunity Home has a closed HCV waiting list, it must reopen the waiting list and place on the waiting list an FYI applicant youth who is not currently on the Opportunity Home HCV waiting list.
- (e) Opportunity Home may reopen the waiting list to accept an FYI eligible youth without opening the waiting list for other applicants. The requirements at 24 CFR 982.206 for giving public notice when opening and closing the waiting list apply.
- (f) Opportunity Home may establish waiting list preferences.

- i) Opportunity Home will establish a waitlist preference for FYI voucher referrals from a PCWA (see 4.3.C).

#### (5) **Reexaminations**

- (a) Annual reexaminations must be conducted for extended FYI vouchers at the end of the 36 month time period and the 48 month time period (see 2.1.A).

#### (6) **Partnering Agencies**

- (a) Opportunity Home must enter into a partnership agreement with a PCWA that may take the form of a Memorandum of Understanding (MOU) or letter of intent.

- i) Opportunity Home has entered into an MOU with PCWA, Texas Department of Family and Protective Services (DFPS).

#### (7) **Supportive Services**

- (a) PCWAs partnered with Opportunity Home must provide supportive services for participating youth to assist them in achieving self sufficiency. Supportive services must be made available for a period of 36 months to eligible youth receiving this assistance. At a minimum, the following supportive services must be offered:
  - i. Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation; and

access to health care (e.g., doctors, medication, and mental and behavioral health services).

- ii. Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance/referrals for assistance on security deposits, utility hook-up fees, and utility deposits.
- iii. Providing such assurances to owners of rental property as are reasonable and necessary to assist eligible youth to rent a unit with a voucher.
- iv. Job preparation and attainment counseling (where to look/how to apply, dress, grooming, and relationships with supervisory personnel, etc.).
- v. Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); attendance/financing of education at a technical school, trade school or college; including successful work ethic and attitude models.

**(8) Terminations [24 CFR Part 982, Subpart L]**

- (a) Opportunity Home must terminate the FYI voucher once the 36-month time limit on assistance has expired.
  - i. FYI vouchers extended in accordance with 2.1.A for either 48-months or 60-months, dependent on continued FSS program compliance and HCV program eligibility, must be terminated once the time limit on assistance has expired.
- (b) Termination of an FYI voucher must be consistent with HCV regulations outlined in Chapter 12.

**(9) Portability [24 CFR 982.353(c)]**

- (a) Portability for an FYI youth must be consistent with HCV regulations outlined in Chapter 10.

## **Appendix D | Summary of Revisions to the Family Self-Sufficiency (FSS) Action Plan**

The organization is not proposing any changes to the FSS Action Plan.



## Appendix E | Asset Management Plan

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

The Asset Management Plan generally covers the five-year period spanning from FY 2023-24 to FY 2027-28. 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 organization 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 organization's 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 organization'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 organization's new construction development plans for real estate assets currently or anticipated to be owned by Opportunity Home San Antonio or its affiliates.
- 3. Acquisitions: Asset Acquisition Plans**  
Details the organization's plans to acquire real estate assets to be owned by Opportunity Home San Antonio or its affiliates. This includes existing affordable housing assets through Low Income Housing Tax Credit (LIGHTC) Re-syndications as well as other real estate assets.
- 4. Dispositions: Asset Disposition Plans**  
Details the organization's plans to dispose of real estate assets currently owned by Opportunity Home San Antonio or its affiliates.
- 5. Other Real Estate Holdings**

Provides a listing of the organization'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.

### 1. A. Public Housing Five Year Capital Improvement Plan

Over the next five (5) years, the Agency plans to invest approximately \$57 million in capital repairs to extend the useful life at 26 properties and approximately 4,305 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 2024 - FY 2028). In addition to the plan below, the agency will prioritize the capital needs of real estate assets based on the physical needs assessment and is also in the process of producing cost estimates for elevator modernizations and generators at various public housing developments. A detailed capital/modernization plan outlining the public housing properties and cost estimates will be added to the Capital Five Year Improvement Plan accordingly.

Fiscal Year (FY) <sup>5</sup> Capital Fund Grant Year (CFP)	Property	Units Preserved <sup>6</sup>	Description	Planned Investment (\$)
<b>FY 2022-23</b>	Alazan-Apache	000	Admin Bldg. Roof/Foundation	581,000
<b>CFP20-22</b>	Blanco	100	Cooling Tower	224,000
<b>(Current)</b>	Cross Creek	66	Foundation / Drainage	20,000
	Fair Avenue	216	Elevator Modernization	1,087,320
	Highview	68	Stormwater Drainage Improvements	526,500
	Lewis Chatham	119	Generator Modernization	TBD

<sup>5</sup> Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2024 begins on July 1, 2023 and ends on June 30, 2024. Capital grants are awarded to Opportunity Home SA every year. Opportunity Home SA then allocates funds based on capital needs.

<sup>6</sup> Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (Capital grants, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non-strategic assets, net loan proceeds from refinances (Beacon) and Housing Bond funds). 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.

<sup>7</sup> Funding sources may be a combination of Capital grants, MTW, sale net proceeds, insurance proceeds, city housing bond funds and federal earmark funds.



	Lincoln Heights	338	Computer Lab ADA - Access Ramp	160,000
	Lincoln Heights	338	Lead Based Paint Project	3,209,000
	Mission Park	100	Lead Based Paint Project	951,000
	Mission Park	100	Foundation Repairs	25,000
	Morris Beldon	35	Site Improvements - Parking Lot	350,000
	Parkview	153	Elevator Modernization	884,000
	Riverside	74	Lead Based Paint Project	700,000
	Riverside	74	Ext Repairs, Roof, Siding, Site Imprv.	TBD
	Springview	180	S&S Solar Lights, Security Cameras	140,000
	Springview	180	Site Improvements-Asphalt-Curb	47,000
	Victoria Plaza	185	1st Floor / Unit Flooring	100,000
	Victoria Plaza	185	Roof Replacement	2,000,000
	Villa Tranchese	201	S&S Camera, Intrusion Control System	120,000
	Villa Tranchese	201	Elevator Modernization	745,000
	W.C. White	75	Generator Modernization	TBD
	William Sinkin	50	Foundation Repairs	20,000
		<b>3038</b>		<b>11,889,820</b>
<b>FY 202-24</b>	Fair Avenue	216	PNA Substantial Renovation	8,200,000
<b>CFP23<sup>8</sup></b>	Morris Beldon	35	PNA Substantial Renovation	1,370,000
	Park Square	26	PNA Substantial Renovation	1,700,000
	Villa Hermosa	66	PNA Substantial Renovation	2,300,000
		<b>343</b>		<b>13,570,000</b>
<b>FY 2024-25</b>	Mirasol	174	PNA Substantial Renovation	4,400,000
<b>CFP24</b>	Francis Furey	66	PNA Substantial Renovation	2,125,000
		<b>240</b>		<b>6,525,000</b>
<b>FY 2025-26</b>	Tarry Towne	98	PNA Substantial Renovation	4,800,000
<b>CFP25</b>	Villa Tranchese	201	PNA Substantial Renovation	12,000,000
		<b>299</b>		<b>16,800,00</b>
<b>FY 2026-25</b>	Jewett Circle	75	PNA Substantial Renovation	2,300,000
<b>CFP26</b>	Westway	152	PNA Substantial Renovation	6,800,000
		<b>227</b>		<b>2,650,000</b>
<b>FY 2027-28</b>	Highview	68	PNA Substantial renovation	3,600,000
<b>CFP27</b>	Linda Lou	10	PNA Substantial renovation	500,000
	South San	30	PNA Substantial renovation	670,000
	William Sinkin	50	PNA Substantial renovation	1,000,000

<sup>8</sup> The capital plan 2023-2027 is a general description of items noted in the physical needs assessment. Properties and detailed scopes will be considered during further PNA evaluation, planning and design stages of the projects.

	158	5,770,000
<b>GRAND TOTAL</b>	<b>4,305</b>	<b>57,204,820</b>

## 1. B. Beacon Communities Five Year Capital Improvement Plan

In the coming years, the Agency plans to invest approximately \$27 million in capital repairs to extend the useful life at 30 properties and approximately 5,482 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 Opportunity Home. 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 Year <sup>9</sup>	Property	Units Preserved <sup>10</sup>	Description	Planned Investment (\$) <sup>11</sup>
<b>2023-2024<sup>12</sup></b>	Burning Tree	108	Replacement or repair of Interior, Exterior & Site Improvements	4,000,000
	Villa de Valencia	104	Replacement or repair of siding	250,000
	Dietrich Road	30	Replacement or repair of shingle roof	394,000
	Woodhill	532	Replacement or repair of parking lots, siding, windows	6,775,000
	Cottage Crk I-II	449	Replacement or repair of sidewalks, parking lot, gutters, AC, fencing	1,733,000
	Woodhill			
	Costa Valencia	762	Foundation Stabilization	133,000
	Towering Oaks	128	Replacement or repair of AC and community	214,000

<sup>9</sup> Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2024 begins on July 1, 2023 and ends on June 30, 2024.

<sup>10</sup> Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that include (Capital grants, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non-strategic assets, net loan proceeds from refinances (Beacon) and Housing Bond funds). 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.

<sup>11</sup> Funding sources may be a combination of available reserves, refinance proceeds, MTW, sale net proceeds, insurance proceeds, city housing bond funds and federal earmark funds.

<sup>12</sup> The capital plan 2023-2027 is a general description of items noted in the physical needs assessment. Properties and detailed scopes will be considered during further PNA evaluation, planning and design stages of the projects.

		sign / Repair of parking lots and retaining wall	
Villa de Valencia	104	Replacement or repair of site, AC and boilers	3,395,000
Bella Claire	67	Replacement or repair of the parking lots, fencing, signage/ Replacement of AC	32,000
Crown Meadows	192	Replacement or repair of sidewalks, gutters, AC / Replacement or repair of fencing, parking lots, exterior paint, pool	554,000
Sunshine	100	Repair of parking lots and pavement / Repair of parking lots	71,000
Churchill	40	Repair of sidewalks / Repair of parking lots	10,000
Courtland	56	Repair of retaining wall / Replacement or repair of exterior paint, parking lots, trees, paint railings	130,000
O'Connor	150	Replacement of AC / Replacement or repair of fencing, paint trim, railings	188,000
Science Park	120	Replacement or repair of sidewalks, gutters, AC, lighting, entry doors, mitigation / Replacement or repair of fencing, paint trim, railings	379,000
Reagan	15	Replacement or repair of roofs and parking lots	100,000
Refugio	210	Replacement or repair of AC, drywall, entry doors, roofs / Replacement or repair of fencing, parking lots, roofs	494,000
Villa de San Alfonso	29	Replacement or repair of pavement, AC, elevator / Replacement or repair of parking lot, fencing, signage	103,000
	<b>3,196</b>	<b>TOTAL</b>	<b>18,955,000</b>
<b>2024-2025</b>			
Converse Ranch I	124	Drainage repairs (Berin/Swale), restripe parking	20,000
Monterrey Park	200	Foundation repairs	500,000
Pecan Hill	100	Foundation, roof, elevator, parking lots	3,000,000
	<b>424</b>	<b>TOTAL</b>	<b>3,520,000</b>
<b>2025-2026</b>			
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
Encanta Villa	56	Playground updates, signage	15,000
	<b>415</b>	<b>TOTAL</b>	<b>100,000</b>

<b>2026-2027</b>	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	25,000
	Castle Point	220	Parking lots, site improvements	110,000
	<b>882</b>		<b>TOTAL</b>	<b>1,885,000</b>
<b>2027-2028</b>	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
	<b>565</b>		<b>TOTAL</b>	<b>2,835,000</b>
<b>GRAND TOTAL</b>		<b>5,482</b>		<b>27,295,000</b>

## 2. Housing Expansion | New Housing Development Plans

### 2. A. New Housing Development Plans

The Opportunity Home'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.

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://homesa.org/public-notice/>

#### 2.A.1. New Construction Completed

Below is a summary of new construction developments that have completed construction and are pending permanent financing.

Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL									
						PH/ PBV	30%	40%	50%	60%	70%	80%	Mar ket		
Aspire at Tampico <sup>12</sup>	D5	Mission DG	4% Tax Credits & Bonds	34,115,710	200	0	9	10	18	68	21	10	64		
Legacy at	D5	NRP	9% Tax	19,155,261	88	40	0	0	0	40	0	0	8		



Alazan <sup>12</sup>			Credits										
Copernicus	D2	NRP	4% Tax Credits & Bonds	55,389,378	318	0	0	17	17	267	17	0	0
Culebra Crossing	D6	Lynd	HUD 221(d)(4)	50,123,889	327	0	0	0	0	0	0	164	163
Kitty Hawk Flats	Converse	NRP	4% Tax Credits & Bonds	40,503,098	212	0	22	0	0	135	55	0	0
Trader Flats (The Scott)	D4	NRP	4% Tax Credits & Bonds	55,753,169	324	0	33	0	0	224	67	0	0
1604 Lofts	D2	NRP	4% Tax Credits & Bonds	56,663,651	324	0	33	0	0	224	0	67	0
Watson Road	D4	NRP	4% Tax Credits & Bonds	60,567,278	348	0	0	18	18	294	18	0	0
<b>Total</b>				<b>372,271,434</b>	<b>2,141</b>	<b>40</b>	<b>97</b>	<b>45</b>	<b>53</b>	<b>1,252</b>	<b>178</b>	<b>241</b>	<b>235</b>

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

# Total development cost = acquisition price plus rehab soft and hard costs

## 2.A.2. Under Construction

Below is a summary of developments planned for construction and/or currently under construction.

						AMI LEVEL								
Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	PH/ PBV	30%	40%	50%	60%	70%	80%	Market	
100 Labor <sup>12</sup>	D1	Franklin	HUD 221(d)(4)	52,438,321	213	0	27		17	0		0	169	
Vista at Interpark	D9	Atlantic Pacific Comm.	9% Tax Credits	17,554,339	64	0	7		16	41	0		0	
Vista at Everest	D1	Atlantic Pacific Comm.	9% Tax Credits	18,109,812	64	0	7		16	41		0	0	
Bristol at Somerset	D4	Louis Poppoon Development Consulting	4% Tax Credit & Bonds	63,331,807	348	0	0	0	0	348	0	0	0	
Horizon Pointe	D2	Integrated Realty Group	4% Tax Credits & Bonds	65,639,352	312	0	20	35	106	0	151	0	0	
Josephine	D1	Lynd	Conventional Loan	68,463,888	259	0	0		0	26		104	129	
Palo Alto	D4	Streamline	4% Tax	67,848,057	336	0	16	16	32	244	28	0	0	



						Credits & Bonds							
Potranco	D4	Lynd	Conventional Loan	67,914,812	360	0	0	0	36	144	180		
Snowden Road <sup>12</sup>	D7	Opportunity Home	9% Tax Credits	34,700,554	135	54	14	26	41	0	0		
<b>Total</b>				<b>456,000,942</b>	<b>2,091</b>	<b>54</b>	<b>91</b>	<b>51</b>	<b>213</b>	<b>777</b>	<b>179</b>	<b>248</b>	<b>478</b>

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

Total development cost = acquisition price plus rehab soft and hard costs

### 2.A.3. Board Approvals

The following is a summary of projects by various stages of the board approval process.

#### 2.A.3.1 Board Final Approval

Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL							
						PH/ PBV	30%	40%	50%	60%	70%	80%	Market
Fiesta Trails <sup>2</sup>	D8	NRP	9% Tax Credits	21,112,430	60	0	18	0	12	30	0	0	0
Viento Apartments	D4	NRP	4% Tax Credits & Bonds	82,000,000	324	49	0	0	161	114	0	0	0
<b>Total</b>				<b>103,112,430</b>	<b>384</b>	<b>49</b>	<b>18</b>	<b>0</b>	<b>173</b>	<b>144</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

Total development cost = acquisition price plus rehab soft and hard costs

#### 2.A.3.2. Board Approval for Bond Inducement

Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL							
						PH/ PBV	30%	40%	50%	60%	70%	80%	Market
Artisan at Springview <sup>1</sup>	D2	Franklin	4% Tax Credits & Bonds	64,001,571	325	65	0		8	181	53	18	0
Victoria Commons - North Pond <sup>1</sup>	D1	Catellus	TBD	TBD	TBD	TBD			TBD	TBD		TBD	TBD
<b>Total</b>				<b>64,001,571</b>	<b>1,834</b>	<b>97</b>	<b>194</b>	<b>12</b>	<b>195</b>	<b>1,468</b>	<b>0</b>	<b>0</b>	<b>6</b>

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

Total development cost = acquisition price plus rehab soft and hard costs

#### 2.A.3.3 Board Approval for Developer



Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL									
						PH/PBV	30%	40%	50%	60%	70%	80%	Market		
Victoria Commons - South Pond <sup>1</sup>	D1	Catellus	TBD	TBD	TBD									TBD	
Victoria Commons - Townhomes <sup>1</sup>	D1	Catellus	TBD	TBD	TBD									TBD	
Vista at Silver Oaks		Atlantic Pacific Comm.	9% Tax Credits	24,183,539	76	0	8	0	23	45	0	0	0		
<b>Total</b>				<b>24,183,539</b>	<b>76</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>23</b>	<b>45</b>	<b>0</b>	<b>0</b>	<b>0</b>		

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

Total development cost = acquisition price plus rehab soft and hard costs

## 2.A.4. Planned Construction Pending Board Consideration

Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL									
						PH/PBV	30%	40%	50%	60%	70%	80%	Market		
Alazan Courts <sup>12</sup>	D5	TBD	TBD	TBD	TBD									TBD	
Vista at Reed	D6	Atlantic Pacific Comm.	9% Tax Credits	22,000,428	70	0	5	0	19	44	0	0	0		
Vista at Henderson Pass	D10	Atlantic Pacific Comm.	9% Tax Credits	21,830,038	66	0	5	0	17	42	0	0	0		
Rainbow Lofts	D3	NRP	9% Tax Credits	20,461,005	60	0	6	0	24	30	0	0	0		
<b>Total</b>				<b>64,291,471</b>	<b>196</b>	<b>0</b>	<b>16</b>	<b>0</b>	<b>60</b>	<b>116</b>	<b>0</b>	<b>0</b>	<b>0</b>		

<sup>1</sup>Opportunity Home owned land

<sup>2</sup>Planned Use of MTW Funds (LNT)

Total development cost = acquisition price plus rehab soft and hard costs

## ALAZAN COURTS REDEVELOPMENT PLAN

The Agency has procured a consultant who has completed a Master Plan for the redevelopment of 501 public housing units at Alazan Courts.

The Master Plan process followed a four part engagement strategy that included

1. Listening and Learning,
2. Visioning and Design,
3. Evaluation and Feedback, and
4. Decision and Celebration.



Opportunity Home initiated the Alazan Courts Master Plan with two main commitments:

1. to provide, at minimum, the same number of homes in the master plan, ensuring no mandatory displacement of residents and
2. providing those units as public housing or public housing-like units, guaranteeing their affordability.

Beyond the programmatic commitments, design goals are

1. to update the unit sizes to comply with current HUD standards
2. to comply with all current building, energy and fire codes
3. to minimize maintenance and costs associated with service and repairs throughout the life of the buildings and
4. and to maintain eligibility for grants and funding mechanisms.

In anticipation of the demolition and/or comprehensive rehab, Opportunity Home has already completed 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). Opportunity Home will also complete an additional project on the Valero baseball field located on adjacent land.

The Alazan Expansion is a critical piece to the success of the overall masterplan. The new construction will operate as a MTW Local non-traditional affordable housing program that provides for "public housing" like units and will offset units that must be relocated away from the Alazan Courts and provide a phasing plan that aims to ensure no displacement of families from the near-Westside neighborhood during redevelopment. This expansion is for 88 new residential housing units located in the baseball field behind the Alazan Community Center and within an adjacent block of Apache Courts. The development totals 110,304 sq ft, with a proposed unit mix of 12 1-bedrooms, 40 2-bedrooms, 16 3-bedrooms, and 20 4-bedrooms.

The deepest affordability will be offered, serving families that are primarily 0-15 percent AMI with the average family income of \$10,200 per year. Priority access to these new units will be given to families currently residing at the existing Alazan Courts. Opportunity Home proposes utilizing MTW and CoSA Housing Bond funds to cover development and relocation costs and will also be seeking Tenant Protection Vouchers (TPV) to assist with the relocation.

### **SHERIFF'S ANNEX**

Opportunity Home is currently in the pre development phase for developing this property for use as a preschool academy. Planning meetings are underway with plans to complete environmental



review, community engagement, disposition, design and formal partnership with a qualified entity to operate the academy when construction is complete. Upon HUD disposition approval, the existing building will be demolished and the site cleared and prepped for construction. The goal of the preschool academy is to provide tuition-free, Montessori-inspired preschool to Opportunity Home children as well as others in this underserved community. The preschool will offer year-round programming, five days a week, for children ages 3-5 years old.

### **VC YMCA BUILDING**

Currently in the pre development phase. Regular meetings are scheduled to complete environmental review and disposition. Upon HUD disposition approval, the existing building will be demolished and the site cleared and prepped for construction. The YMCA site will be the future site of single-family market rate housing and the proceeds from the sale of the land will be used to create affordable housing.

### **VC ADMIN BUILDING**

Currently in the pre development phase. Regular meetings are scheduled to complete environmental review and disposition. This building was the original central office for Opportunity Home so residents in the community have mixed emotions regarding its redevelopment. The agency will continue to work with the neighborhood to determine whether the entire building or just its facade is to be preserved or if it is to be totally demolished. The VC Admin Building is the future site of additional mixed-use, mixed-income housing.

## **3. Acquisitions | Asset Acquisition Plans**

### **3. A. Low Income Housing Tax Credit (LIHTC) Re-syndications**

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 an Opportunity Home 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:

- Alhambra
- Artisan at Creekside
- Artisan at Mission Creek
- Artisan at Salado Falls
- Costa Almadena
- Costa Mirada

- Elan Gardens
- Midcrown Senior Pavillion
- Rosemont at University Park
- San Juan Square I

Project Name	District	Developer	Financing	Date	Total Development Cost (\$)	Total Units	AMI LEVEL							
							PH / PB V	30 %	40 %	50 %	60 %	70 %	80 %	Market
The Sorento # (resyndication of tax credits)	D7	Fairfield Residential	4% Tax Credits & Bonds	acquisition closed (tax credits resyndication closed 6/21/22)	41,061,812	248	0	38	0	0	210	0	0	0
Bethel Place # (resyndication of tax credits)	D6	Fairfield Residential	4% Tax Credits & Bonds	acquisition closed (tax credits resyndication closed 6/24/22)	42,812,000	250	0	38	0	0	212	0	0	0
Rosemont at University Park (resyndication of tax credits)	D4	Roers Companies	4% Tax Credits & Bonds	acquisition closing estimated 7/31/22	TBD	240	0	36	0	0	294	0	0	0
Costa Almadena (resyndication of tax credits)	D3	DEVCO	4% Tax Credits & Bonds	acquisition closed (tax credits pending)	TBD	176	0	27	0	0	149	0	0	0
Tigoni Villas (resyndication of tax credits)	D7	DEVCO	4% Tax Credits & Bonds	acquisition closed (tax credits pending)	TBD	140	0	22	12	22	84	0	0	0
The Ravello (purchase of limited partnership interest)	D3	Opportunity Home will own 100% of partnership	N/A	11/1/2022	N/A	252	0	0	0	0	252	0	0	0
San Juan II (purchase of limited partnership interest)	D5	Opportunity Home will own 100% of partnership	N/A	5/25/2022	N/A	144	48	15	0	0	123	0	0	6

### 3. B. Other Acquisitions

The Agency has no active acquisition plans.



## 4. 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
VC YMCA Building	1225304	440 Labor
VC Admin Building	1225303	400 Labor
Springview - Vacant land around 202 Garcia St.	115610	700 Garcia St
Springview (Former Administration Building For East Terrace) (Sheriff's Annex)	115790	202 Garcia St
WRI Parcels (Home ownership)	Multiple	Various parcels on VILLA ROSA VILLA LINDA PRECIOUS DR VILLA FLORES VILLA PLACER
Vacant parcels near Victoria Commons	108009	331 LAVACA ST
	108019	LABOR
Parcel near East Meadows II	114002	1323 N WALTERS

## 5. Strategic Holdings | Other Real Estate Holdings

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

BCAD Property IDs	Property Address	Description
109402 / 109403	550 BROOKLYN AVE	Rex Site
477781	SOMERSET RD	Two adjacent parcels near Costa Mirada
477796	9000 SOMERSET RD	
115560	1901 MONTANA ST	
115561	1907 MONTANA ST	
116082	102 S MEL WAITERS WAY	
115581	2830 E COMMERCE ST	
115582	2407 EZELL	
115583	2411 EZELL	
115584	2415 EZELL	
115585	2415 EZELL	Miller Child Development Center / Springview
115586	E COMMERCE ST	
115588	2902 E COMMERCE ST	
115589	2906 E COMMERCE ST	
115590	2910 E COMMERCE ST	
115595	2603 EZELL	
115597	2603 EZELL	
115600	2607 EZELL	
115602	2944 E COMMERCE ST	



115603	EZELL	
115808	903 HEDGES ST	
115809	909 HEDGES ST	
115810	913 HEDGES ST	
115811	915 HEDGES ST	
115812	917 HEDGES ST	
115813	927 HEDGES ST	Artisan at Springview (unfunded)
115814	929 HEDGES ST	
115815	931 HEDGES ST	
115816	933 HEDGES ST	
115817	935 HEDGES ST	
115818	937 HEDGES ST	
116625	916 HEDGES ST	
124452	1706 CINCINNATI AVE	Vacant parcel
112725	2738 DIGNOWITY AVE	
112737	719 RUNNELS AVE	Adjacent to TPSO and Sutton Oaks I
112739	731 RUNNELS AVE	
112746	1011 LOCKE ST	
141735	509 SALTILLO ST	Vacant parcel
151169	4063 BREMEN ST	Vacant parcel
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	Eastside Lots - possible home ownership
441311	1071 POINSETTIA	
512161	E COMMERCE ST	
551676	1822 ARBOLEDA ST	
580339	7822 GLIDER AVE	
114103	1418 HAYS ST	
115258	1528 PASO HONDO	
115259	1528 PASO HONDO	



## 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
	611 SW 28th	Avance
	307 Marshall	Sprint Spectrum Realty Company, LLC
	102 South Rio Grande	Miller Child Development Center INC
	411 Barrera	Cellco Partnership d/b/a Verizon Wireless

## Appendix G | Proposed Alternative Definition to Self-Sufficiency

As part of the organization's commitment to delivering services in a manner that creates fair outcomes, the organization is proposing an alternative framework to MTW self-sufficiency. As a direct result of the adoption of the organization's new values and a renewed focus on systematic racism and inequities; the organization is proposing to supplement the current MTW self-sufficiency (SS #8) with additional measures and narrative that better reflect the organization's priorities and intent.

To be clear, the current housing system is inequitable and intersects with many other systems that also produce inequitable outcomes. Opportunity Home recognizes that and will no longer focus its MTW success on an individual's ability to meet economic self-sufficiency in spite of these systemic inequities. Rather, the organization will measure its success on whether the organization is able to eliminate inequities through changes in its rules, processes, and policies.

In addition to organizational changes, we aspire to shift societal narratives, stereotypes and biases about residents from low-income, disenfranchised and marginalized communities to one of valuing the inherent dignity of all people. Households are not failing to achieve economic self-sufficiency; our organization and the systems are failing to create environments where all have the opportunity to thrive and succeed. This proposal is intended to directly recognize this reality.

### Background

- *Self-sufficiency* is one of the three MTW Statutory Objectives: "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"
- In 2013, HUD implemented a new standard 50900 Form that requires the organization to track "self-sufficiency" in Section II of the Annual Report.

<b>SS #8: Households Transitioned to Self Sufficiency</b>
<b>Unit of Measurement</b>
Number of households transitioned to self sufficiency (increase). The PHA may create one or more definitions for "self sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.



- After various external and internal workgroups on existing definitions and ways of measuring “self-sufficiency”<sup>13</sup>, in 2014, the organization adopted a definition that is focused on economic self-sufficiency -- specifically, a household’s ability to pay market or near market-rate rent.
  - A PH household who is paying a flat rent for at least 6 months or a HCV household utilizing a zero HAP voucher for at least 6 months.
  - Over the last 9 years of tracking, the organization has documented an average of 50 households per year on average who meet this criteria.

## Proposal

The organization proposes to adopt the following:

1. MTW HUD Objective: Self-sufficiency as Economic Self-Sufficiency
2. MTW Opportunity Home Objective: Self-Sufficiency as Housing Stabilization and High Quality of life

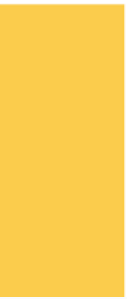
## MTW Reporting Impacts

The organization is committed to meeting it’s MTW requirements and thus will continue tracking SS#8 as currently defined; however, this measure will also be accompanied by additional measures and narrative.

- **Housing Stabilization**  
Number of households who remain stably housed; defined as households served during the fiscal year who were not terminated or moved out for negative reasons (ie, evictions, terminations)
- **Quality of Life**  
Percent of households surveyed who are satisfied or very satisfied when asked “In the last 30 days, how satisfied were you with your quality of life?”

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<sup>13</sup> <https://selfsufficiencystandard.org/>  
<https://public.tableau.com/app/profile/selfsufficiencystandard/viz/AllStates2021/SSS2021>  
<https://www.mass.gov/doc/accs-self-sufficiency-matrix-0/download>



A COMMUNITY OF POSSIBILITIES