Executive Summary

Proposed MTW Plan FY 2024-2025

Purpose
This document provides highlights from Opportunity Home San Antonio’s Moving to Work (MTW) 2025 Annual Plan.

The complete plan is available at https://homesa.org/business/innovation/moving-to-work/.

Background
Opportunity Home San Antonio provides housing to over 62,500 children, adults, and seniors through four housing portfolios — Public Housing, Housing Choice Vouchers, Beacon Communities, and other communities in partnership with non-profit entities and other agencies. Opportunity Home currently employs over 600 people and has a total annual operating budget of $258 million. Existing real estate assets are valued at over $500 million.

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

The MTW designation provides Opportunity Home with the flexibility to design and test innovative approaches to enhance the organization’s programs. The MTW designation also provides funding flexibility by combining Public Housing operating subsidies, Capital Fund Program (CFP) grants, and Housing Choice Voucher (HCV) program subsidies into a single fund block grant.

MTW Plan Overview
Opportunity Home’s MTW Annual Plan follows a HUD-prescribed format and includes information on planned changes in housing stock, leasing and waiting lists and high-level summaries of sources and uses of funding and plans for capital improvements.
The MTW Annual Plan also contains descriptions of Opportunity Home’s MTW activities, including proposals for new authorizations and updates to already approved MTW activities. Previously approved MTW authorizations provide Opportunity Home with the flexibility to adopt local alternatives to HUD policies and regulations. Opportunity Home retains these authorizations provided they continue to be included in each year’s Plan. Over time, the organization’s implementation of these activities may vary depending on changing local needs and opportunities. Most of the implementation policies related to our MTW activities are integrated in documents such as the Housing Choice Voucher Administrative Plan and the Housing Operations Admissions and Continued Occupancy Policy.

Summary of Proposed Plan

1. Short-term and Long-term Goals
   The Organization’s strategic plan focuses on priority outcomes for three key populations, residents, employees, and community partners. Priority long-term outcomes have been identified for each population and specific short- to medium-term outcomes developed suggested to guide strategy development and implementation.

2. Projected Changes to MTW Housing Stock, Leasing and Waiting Lists

   **MTW Housing Stock**
   - Opportunity Home does not anticipate any changes to public housing units, or tenant-based vouchers in FY2025.
   - The organization has allocated an additional 53 project-based units at Woodhill to support the Family Homeless Program.
   - Opportunity home anticipates to expand the units under local, non-traditional housing programs through investment in the preservation of over 1,000 affordable units at seven (7) properties in the Beacon and Partnerships portfolios.

   **Public Housing Capital Investment**
   - Public Housing: Over the next five (5) years, the Organization plans to invest approximately $71 million in capital repairs to extend the useful life at 24 properties and approximately 3,904 housing units.

   **MTW Leasing**
   - Opportunity Home anticipates the continuation of current occupancy in public housing. Leasing utilization is expected to continue until meeting the budgeted planned vouchers.
   - Leasing for local non-traditional units is expected to increase in the coming fiscal year.

   **MTW Waitlists**
   - Currently, there are over 100,000 households on any of the organization’s waitlists. Demand is expected to remain high in 2025.
The Organization is planning to transition away from site-based project-based voucher waitlists and conduct additional waitlist maintenance in the coming fiscal year.

Public Housing waitlists are the only waitlists that are planned to be open.

3. Proposed New Regulatory Waivers (Referred to as MTW Activities)
   - Opportunity Home is not proposing any new strategies using regulatory waivers.

4. Proposed Changes to Regulatory Waivers (Referred to as MTW Activities)
   - Opportunity Home is proposing to amend one existing activity
     - Under Opportunity Home’s broader uses of funds authority, Attachment D, the Organization may use MTW funding for local, non-traditional purposes providing that the activities meet the requirements of the MTW statute and comply with PIH 2011-45. In addition to using funding for housing preservation and expansion, the organization is adding to this activity the flexibility to use funding to provide services only. Funding allocation would happen during the budget process and be pursued in support of future potential partnerships. For example, providing light touch services to those waiting on a housing wait list but not currently receiving housing assistance. (See Activity titled: FY2011-1e | Local, Non-Traditional Uses of MTW Funds for Preservation/Expansion of Housing and Service Provision)

5. Sources and Uses of Funding
   - HUD’s prescribed MTW Plan format requires the Organization to provide funding information for only a subset of the Organization’s source and uses that is under the Moving to Work designation. For a more complete picture of the Organization’s 2024 Budget, please visit https://homesa.org/business/about-homesa/financial-information/.
   - The Organization plans to continue using its funding flexibilities to fund shortfalls in the voucher and public housing operating funds as well provide funding for resident services. In addition, funding is also planned to be allocated to preservation and expansion of housing units.

6. Other Non-MTW Program Policy Updates
   - Opportunity Home is working to implement HUD’s release of the final ruling of the Housing Opportunity Through Modernization Act of 2016 (HOTMA).
     - Both the Administrative Plan and Admissions & Continued Occupancy Policy (ACOP) will be updated to comply with new policies and regulations.
     - HOTMA Policies will be effective January 1, 2025.
 Proposed Policy Change in ACOP and Administrative Plan - Self Certification of Net Family Assets Equal to or Less than $50,000

- In addition, the Organization proposes to make the following policy change to improve processes for the Administrative Plan and ACOP.
  - Proposed Policy Change in ACOP - Other Permitted Reasons for Denial of Admission: Opportunity Home may deny admission based on the termination reason for family members that have been terminated from federally-assisted housing in the last three (3) years.

7. Asset Management Plan

- Expansion
  - The organization has constructed 1,260 new units that are awaiting permanent financing — 76% are affordable at 80% AMI or below.
  - An additional 1,037 units are in the construction pipeline and expected to be completed — 83% are affordable at 80% AMI or below.
  - There are another 1,200 units in the pre-development phase at various stages of consideration and approval.

- Preservation
  - In addition to public housing preservation efforts, the Organization is planning to invest $22 million in capital repairs to extend the useful life at 22 properties and approximately 3,458 units in the Beacon Communities portfolio.

- Acquisitions
  - During the plan year, the organization 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. Currently, there are seven (7) properties under consideration.

8. Resident Advisory Board

- Currently, the organization consults with residents during a series of meetings throughout the public comment period. In addition, the organization administers resident surveys twice a year to seek input on our strategic goals and what challenges they may have.

- Opportunity Home is proposing to formalize a new Resident Advisory Board to participate in the annual MTW planning process as well as the ongoing strategic planning process on a more regular basis. The resident advisory board will be made up of public housing resident council members (or a future jurisdiction-wide resident council) and voucher resident representatives who participate in Opportunity Home’s strategic planning and annual MTW planning processes.