PROPOSED

Annual **MTW PLAN**

Fiscal Year 2024-2025

July 1, 2024 to June 30, 2025

Formerly San Antonio Housing Authority

OPPORTUNITY™ HOME SAN ANTONIO

A COMMUNITY OF POSSIBILITIES

Document submission date:
MTW Plan DRAFT Released For Public Comment: February 14, 2024
MTW Plan DRAFT Submitted to HUD for review: April 15, 2024
Final MTW Plan Submitted to HUD for approval:
Final MTW Plan Approved by HUD:

Section I | Introduction

Section I. A. | Table of Contents

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

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.

Strategic Plan Summary

The organization's strategic plan describes the organization's priorities for the next five years. It also describes how those priorities connect to a shared understanding of the environment in which the organization works (theory of change), the impact of the organization'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 Statemen**t: 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, employees, and community partners. Priority long-term outcomes have been identified for each population and specific short- to medium-term outcomes developed to guide implementation. The following list includes outcomes and strategies that are in discussion or development stages.

Resident Focus

1. Residents have a high quality of life
    a. Residents graduate from high school
    b. Residents secure and maintain suitable employment
    c. Residents are able to live at their desired level of independence
    d. Residents are able to age in place

2. Resident race/ethnicity does not determine housing assistance or support service 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

3. Residents feel safe
    a. Social cohesion: develop trust and reciprocity
    b. Centralized data management: Employees collect, analyze, and act on safety data in the context of larger trends at program or organizational level
    c. Resident and employee health and safety are not repeatedly threatened by other residents' criminal activity or serious lease violations

4. 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

5. Residents have meaningful housing choice

a. Residents have the resources to make informed decisions (do not lack information about feasibility, pros/cons, processes) including knowing what choice they have (do not lack information about existing options)
b. Residents have the resources to follow through on their decisions (tradeoffs and costs are mitigated or addressed)
c. 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
2. MTW STS Compliance
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. Community's economy and health outcomes are sustained for future generations
2. Customer Service/Customer Experience
3. Excellence

In FY2023, Opportunity Home formalized aspects of the strategy management function throughout the organization. A three-tier scorecard was developed and implemented at Tier 1 and Tier 2. Tier 1 describes organizational priorities, while Tier 2 describes departmental priorities. Tier 3, scheduled to be implemented in the next two years, will focus on individual (position) priorities.

The strategic plan is continuously updated through a process that periodically assesses 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	POPULATION TYPE**	Section 504 Accessible 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: Public Housing Units to be Removed in the Plan Year	**0**	

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-BASED	RAD?	DESCRIPTION OF PROJECT
N/A			
TOTAL: Planned new Project Based Units in Plan Year	0		

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	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Gardens at San Juan	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	Leased / Issued	No	Final phase of Choice Neighborhood
Woodhill	88	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), 53 units to support the Family Homeless Program
Rosemont at Highland Park	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)

Total: Planned Existing Project-Based Vouchers	**183**

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
Springview (TX006000031) - 202 Garcia St and 700 Garcia St (Sheriff's Annex and Surrounding Vacant land) and 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. Environmental reviews are being completed and will move forward with demolition. Future use will be determined at a later date. The organization will be obtaining HUD approval to dispose of public housing real estate. This disposition is planned for FY2025. ● Victoria Plaza/OP Schnabel TX006000008 ○ Victoria Commons, YMCA building located at 440 Labor Street, San Antonio, Texas 78210 ■ The organization obtained 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 Organization has several new developments under construction that will increase the Organization's LNT portfolio. In addition, the Organization 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 Organization'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
PHA Wide	2,000,000	Ph.II Intrusion Protection/Security Cameras
Alazan-Apache	581,000	Admin. Building Roof / Foundation
Blanco	2,500,000	Housing Related Hazard Improvements
Blanco	500,000	Burn Restoration
Cassiano	4,800,000	Lead Based Paint Project
Fair Avenue	1,000,000	Elevator Modernization
Highview	3,700,000	PNA Substantial Renovations
Lincoln Heights	1,000,000	PNA Substantial Renovations
Lincoln Heights	4,700,000	Lead Based Paint Project
Matt Garcia	2,000,000	Housing Related Hazard Improvements
Matt Garcia	500,000	Burn Restoration
Mission Park	TBD	Lead Based Paint Project
Olive Park	1,500,000	PNA Substantial Renovations
Riverside	700,000	Lead Based Paint Project
Riverside	TBD	PNA Substantial Renovations
Springview	140,000	S&S Solar Lights, Security Cameras
Springview	800,000	Drainage Improvements/Roof Replacement/HVAC
Victoria Plaza	4,000,000	Roof Replacement
Villa Hermosa	100,000	Burn Restoration
Villa Tranchese	120,000	S&S Camera, Intrusion Control System
Village East	1,500,000	PNA Substantial Renovations
Total	**32,141,000**	

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	69,924	5,827
MTW Housing Choice Vouchers (HCV) Utilized	135,600	11,300
Local, Non-Traditional: Tenant-Based^	NA	NA
Local, Non-Traditional: Property-Based^	21,072	1,756
Local, Non-Traditional: Homeownership^	NA	NA

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
Planned Total Households Served:	**226,596**	**18,883**

* "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		21,072	1,756
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	Increases in homelessness and criminal activity at PH properties may impact leasing, as vacant units made ready for leasing are frequently broken into and vandalized, and the appliances are stolen. This causes us to expend more time and resources than usual to lease a unit. Furthermore, the costs of vendor-provided make ready services and supplies have increased dramatically since after COVID. Opportunity Home continues to develop strategies in response to these challenges. At properties where vacant unit break-ins occur most often, the maintenance staff fabricate and install security doors and window covers to protect the unit from break-ins, or they remove appliances from the unit and store them in a secure area and reinstall them right before the unit is ready to be leased. We continue to explore ways to better utilize our staff to reduce the need for costly vendor-provided services.
MTW Housing Choice Voucher	The organization has increased voucher utilization substantially during FY2024. The organization continues to experience difficulties in retaining qualified individuals to these positions. The introduction of the new AHP trainer helped improve staff retention, but various outside factors continue

	hindering the retention. A shift in roles of newly hired staff members have been promoted to various positions outside the department and staff ending their employment unexpectedly. AHP continues to work with local staffing agencies to fill temporary vacancies to assist in customer service and Housing Assistance Specialist positions. AHP landlord recruitment is an ongoing effort that includes numerous outreach events. These events focus on providing potential and existing landlords with up-to-date information on the HCV program while informing them of the benefits of partnering with Opportunity Home. For improvement to landlord communication, AHP created a video resource for landlords detailing the requirements to pass a Housing Quality Standards (HQS) inspection. This video was developed as a resource for landlords to use, ensuring they pass HQS inspections the first time.
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	17,141	Closed	No
Accessible Unit Public Housing	For applicants who require a 504 accessible unit	1,631	Open	N/A
Elderly Mix Public Housing	For applicants who are 62 and above or who have a documented disability (they may be under the age of 62).	5,053	Open	N/A
Family Public Housing	For applicants who do not require 504 accessible units or who do not meet elderly / disabled family	32,477	Open	N/A

	definition"			
Public Housing	Site-Based; one list for every property	37,552	Closed	No
La Posada MOD Rehab	Site-Based	43,812	Currently closed as of 8/13/23	N/A
Prospect Hill MOD Rehab	Site-Based	2,010	Currently closed as of 8/13/23	N/A
Serento MOD Rehab	Site-Based	28,856	Currently closed as of 8/13/23	N/A
East Meadows Project-Based Vouchers	Site-Based	16,021	Closed as of 6/21/21	N/A
Gardens at San Juan Project-Based Vouchers	Site-Based	34,616	Closed as of 6/21/21	N/A
Wheatley Park Senior Project-Based Voucher	Site-Based	1,219	Closed as of 8/13/23	N/A
PBV Preferred Beacon	Site-Based	0	Private waitlist not open to public, used for EHV referrals	N/A
Emergency Housing Voucher	Voucher	7	Open (Referrals Only)	N/A
Local Non-Traditional Property-Based	Voucher	0	Closed (Referrals Only)	Yes
Stability Voucher	Voucher	0	Open (Referrals Only)	N/A

Please describe any duplication of applicants across waiting lists:
Waitlist figures are reported as of February 1, 2024. There are a total of 112,580 unique households on any of the wait lists above.

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 November 1, 2023 - November 15, 2023. At the end of the closing date, 15,000 applicants were randomly selected to be placed on the waitlist. Opportunity Home does not anticipate re-opening the waitlist in 2024.
La Posada MOD Rehab	None
Prospect Hill MOD Rehab	None
Serento MOD Rehab	As the Serento Property is no longer under MOD-Rehab contract, the waitlist will be purged and closed permanently. Communication will be provided to all current applicants on the Serento waitlist.
Public Housing	None
East Meadows Project Based Vouchers	The Organization is planning to transition away from site-based PBV waitlists.
Gardens at San Juan Project Based Vouchers	The Organization is planning to transition away from site-based PBV waitlists.
Wheatley Park Senior Project Based Voucher	The Organization is planning to transition away from site-based PBV waitlists.
PBV Preferred Beacon	None
Local Non-Traditional Property-Based	The Organization is expecting to establish the local non-traditional property-based waitlist in FY2024.

Section III | Proposed MTW Activities

The organization is proposing amendments to one existing MTW activity.

FY2011-1e | Local, Non-Traditional Uses of MTW Funds for Preservation/Expansion of Housing and Service Provision

(formerly FY2011-1e | Preservation and Expansion of Affordable Housing)

Background

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.

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

Significant changes

- The organization is proposing to amend this activity to include a new local, non-traditional use category of "Service Provision only". The amendment will also allow the organization to use MTW funds under this use category for future services only initiatives as outlined in Section V.A.iv. Planned Application of PHA Unspent Operating Fund and HCV Funding.

Non-significant changes

- The organization is proposing to rename this activity to FY2011-1e | Local, Non-Traditional Uses of MTW Funds to reflect the broader use authority authorized by Attachment D and described in further detail in PIH 2011-45.
- The organization is proposing one new metric to correspond to this new use.

A. Activity Description

Under Opportunity Home's broader uses of funds authority, Attachment D, the Organization 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 Organization 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 Organization 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 Organization 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).

B. Activity Metrics Information

HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection

Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	None	None

Data Source: Internal development tracking.

HC #2: Units of Housing Preserved

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

Data Source: Internal preservation tracking.

Households Receiving Local, Non-Traditional Service Only

This metric corresponds to Section 2 LNT Services only reporting.

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Average number of households per month receiving services at the child care center (excludes households in Public Housing and Voucher Programs)	0	0	None	None

Data Source: Data Sharing Agreement with the partner

C. Cost Implications

The organization plans to invest funds under this activity as outlined in Section V.A.iv. Planned Application of PHA Unspent Operating Fund and HCV Funding. Currently, the organization does not anticipate cost implications in FY2025.

D. Need/Justification for MTW Flexibility

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

As the organization continues to work with its partners to identify and strategize on how to best meet the needs of our local community the broader use of funds authority -- specifically the addition of services provision, may be needed in the future. At which time, the organization would outline the use under this activity as well as in the sources and uses section.

E. Rent Reform/Term Limit Information

Not Applicable.

Section IV | Approved MTW Activities

A. Implemented Activities

FY2011-1e | Preservation and Expansion of Affordable Housing

See Section III: Proposed Activities for proposed amendments to this activity.

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 Organization has several projects in the development pipeline that are planned to utilize MTW funding. In addition, the organization 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 Organization anticipates leveraging MTW investments for these investments (see Appendix E. Asset Management Plan for additional details on the Organization's preservation and expansion plans).

In FY2023, the organization used MTW flexibilities to preserve affordable housing units at 12 multi-family properties. The total unit count across all properties is 1,841 with 1,724 affordable at 80% or below.

Description: Under Opportunity Home's broader uses of funds authority, Attachment D, the Organization 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 Organization 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 Organization 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 Organization 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 organization 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 Organization 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 Organization 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. Elan Gardens
5. Hemisview Village
6. San Juan Square I
7. Sutton Oak I

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

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

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

None.

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 Organization 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

Median Tenure

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Median 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.

FY2013-4 | 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 Organization 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 Organization's non-profit portfolio or owned by a Opportunity Home affiliate under the Organization'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 Organization 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. Organization 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 | Organization 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

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 | Organization 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 Organization 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 Organization 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. The organization is currently reviewing this activity to determine whether changes need to be made in the coming planning cycle.

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 Organization 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 Organization received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Organization 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 | Organization 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

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

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 Organization to increase housing choices for elderly residents at selected public housing properties.

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 Organization 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

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 Organization 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 Organization'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 Organization's Moving to Work funding flexibility.
- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Organization's Beacon Communities Portfolio. Due to lack of vacancies, the Organization 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 Organization'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 organization'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. The organization recently allocated 53 additional vouchers effective January 2024 at Woodhill to support the Family Homeless Program.

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

The organization has allocated an additional 53 units at Woodhill to support the Family Homeless Program.

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	AMI upper limit of households living in	Targeted AMI upper limit of households	None	None

local project based set-aside voucher units, by income bracket	units	living in units		
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 Organization 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.

FY 2024 Payment Standards were set at 90% to 105% of SAFMRs to be effective for new admissions January 1, 2024 or later and recertifications effective April 1, 2024 or later.

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 Organization 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 Organization'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 Organization 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 Organization requested and received a waiver in Year 1 (FY 2018-2019).

On June 27, 2019, the Organization received HUD approval to extend this MTW Agreement provision to its HUD-VASH program. The Organization 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 Organization anticipates reviews of the payment standards every year in August/September when new SAFMRs are published by HUD.

Zip Code Grouping methodology: The Organization 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 Organization 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 Organization reviewed various methods for setting the payment standard in each Tier. The goal of the review was to establish a method that allowed the Organization 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 Organization 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 Organization 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 Organization 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 Organization 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 Organization 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 Organization 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 organization 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 Organization'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 Organization'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.

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. As a result of HOTMA, this specific change to HUD forms is no longer needed; however, in the future, the organization may create its own local forms with different expiration dates or other elements to accommodate this activity.

Beginning January 1, 2025, the organization will not longer need the alternative income verification methods in this activity. This is the result of new HOTMA implementation which allows for self-certification of assets totaling $50,000 or less.

The organization currently does not process interim recertifications when there's an increase in income, but new HOTMA rules would require the organization to process increases in unearned income over 10% if there has already been a decrease in income in the recertification period. Opportunity Home intends to continue not processing income increases in order to not negatively impact residents, and to continue the intention of MTW Activity FY2019-2 to streamline procedures and reduce administrative burden.

(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 Organization has been using alternative schedules since 2011. In FY2023, the organization updated the schedule for all households to triennials.

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)

Beginning January 1, 2025, this will no longer be necessary due to HOTMA implementation.

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 Organization received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Organization 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

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. As a result of HOTMA, this specific change to HUD forms is no longer needed; however, in the future, the organization may create its own local forms with different expiration dates or other elements to accommodate this activity.

Beginning January 1, 2025, the organization will no longer need the alternative income verification methods in this activity. This is the result of new HOTMA implementation which allows for self-certification of assets totaling $50,000 or less.

The organization currently does not process interim recertifications when there's an increase in income, but new HOTMA rules would require the organization to process increases in unearned income over 10% if there has already been a decrease in income in the recertification period. Opportunity Home intends to continue not processing income increases in order to not negatively impact residents, and to continue the intention of MTW Activity FY2019-2 to streamline procedures and reduce administrative burden.

Planned Changes to Metrics / Data Collection

CE #1 | Organization 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	HCV: 16% PH: 45%	HCV: 16% PH: 40%	None	None

task as a percentage (decrease).

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 ongoing. As a result, our partners have been able to increase awareness of the issue amongst its student population and are more successful in identifying students who are experiencing homelessness. As a result, the organization is currently discussing the possibility of expanding voucher allocations to meet the growing need.

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 Organization 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 Organization's set-asides allocated under FY2011-9.

This activity allows the Organization 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 (both Alamo Area Colleges). The Organization may set-aside additional vouchers to support additional college(s) and/or university(ies) who enter into a partnership with the Organization.

Students seeking housing vouchers through the Homeless Assistance Program(s) must meet criteria outlined by the partner organization. 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 organization 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 Organization does not require standard HCV leases, the Organization does ensure leases include language per HUD regulations. The Organization [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

The organization is currently exploring adding additional vouchers to this program.

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	100	Benchmark updated to reflect new set-asides	Metrics will no longer be tracked by specific college for Alamo Community College partnership

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	100	Benchmark updated to reflect new set-asidesNone	Metrics will no longer be tracked by specific college for Alamo Community College partnershipNone

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	0	100	Benchmark updated to reflect new	Metrics will no longer be tracked

aimed to increase self sufficiency (increase).	set-asidesNone	by specific college for Alamo Community College partnershipNone

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 Organization is currently working with the partner to address ongoing challenges as a result of the pandemic. This pilot program is offering many opportunities for the organization to test and learn how to partner with another organization to meet the unique needs of youth aging out of foster care. The design of the housing assistance has presented challenges for students as well as property management. Students do not have location choice as a result of the project-based housing. In addition, property management has faced challenges with balancing occupancy needs with ensuring units are available for students as soon as possible.

As a result, the organization is exploring whether to administer these vouchers in the same manner as the Foster Youth to Independence (FYI) vouchers, which serve the same population and may address both of the current challenges. The organization applied for and recently received FYI vouchers. Once the organization begins leasing those vouchers, the organization intends to review this activity to determine whether this pilot is the most effective way to serve this population.

Description: The housing assistance provided by the Organization 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[1]. 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] Youth may currently be in extended foster care.

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 Organization and partner have identified program design changes that require additional MTW waivers.

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 Organization'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. Since the organization is no longer implementing the rental cap, this waiver that allows the organization to limit rental increase requests to one per year will be consolidated with FY19-2 Alternate Recertification to streamline reporting and activity management. This activity is intended to be closed out in the FY2024 MTW Report.

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 organization 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 Organization'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 Organization arrived at 3% by conducting a historical rent increase analysis. The Organization 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 organization is able to meet MTW requirements of serving substantially the same number of households.

Planned non-Significant Changes

Since the organization is no longer implementing the rental cap, this waiver that allows the organization to limit rental increase requests to one per year will be consolidated with FY19-2 Alternate Recertification to streamline reporting and activity management. This activity is intended to be closed out in the FY2024 MTW Report.

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

(formerly 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 Organization'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)	

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.

FY2023-1 | Income-Based Housing Assistance Program (Local Non-Traditional)

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

This activity has not been implemented yet. The first property which will utilize this activity will be the currently under construction Beacon property, Snowden, which will allocate 54 units as part of this activity. Snowden is currently expected to begin turning buildings in March 2024. The activity has been renamed per branding efforts. In addition, separate policies and procedures are being finalized and expected to be implemented by the end of FY2024.

Background: The Organization 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 Organization 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 Organization 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 organization 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 Organization'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 Organization 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 Organization identifies new projects, those will be listed in the Organization'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.

FY2024-1 | Elimination of Earned Income Disregard

Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures. The activity was approved in the FY 2023-2024 MTW Plan and is expected to be closed out in FY 2025-2026 when the organization implements HOTMA regulations effective January 1, 2025.

Description/Update

Update: None.

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.

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).	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

Planned Significant Changes

None.

B. Not Yet Implemented Activities

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 Organization implemented its Workplace Transition Plan, Transition Level 1, Emergency Operations. On June 22, 2020 the Organization 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.

27. **FY2013-2 – Simplified Earned Income Disregard (S-EID)**

    This activity was originally implemented to support the Social Innovation Fund (SIF) Jobs Plus Pilot (referred to as Westside Jobs Plus Program)-- which ended services at Alazan and Mirasol on March 31, 2016. Households enrolled in S-EID through this pilot were grandfathered into the incentive and allowed to continue their participation in S-EID until expiration of their term. This activity was superseded by FY2024-01 Elimination of Earned Income Disregard activity closed out in the FY 2023 Report. The organization is anticipating changes as a result of HUD's HOTMA Final Rule guidelines on January 1, 2024 which will eliminate EID.

28. **FY2020-3 – Family Self Sufficiency (FSS) Program Streamlining**

    A new HUD FSS final rule eliminated the need for this activity to address the 120-day rule. The modified contract element is still needed due to the FY2014-6 Rent Reform activity. In an effort to streamline activity reporting and group waivers working together, this waiver was moved to FY2014-6 and the FY2020-3 activity closed out in the FY 2023 Report.

Section V | Planned Application of MTW Funds

Planned application of MTW funds currently reflect estimates using the approved budget for FY2024. Figures will be updated according to the following timeline:

- **April 2024: Preliminary FY2025 budget figures as part of the initial HUD Submission**
- **June 2024: Final FY2025 budget figures per the FY2025 budget as approved by the Board of Commissioners scheduled in June 2024.**

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
70000	**Total Revenue**	**$195,072,848**

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
90000	**Total Expenses**	**$189,024,792**

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.

Resident Engagement Team (formerly referred to as Community Development Initiative Department): The Organization uses moving to work funds to support the Resident Engagement Team. These funds allow the Organization to provide higher quality supportive services to residents than would otherwise be permitted by grant funding alone. In addition, the Organization is able to more effectively engage with partners and leverage resources for the benefit of the residents.

Resident Engagement Team Services

- Resident Outreach
- Service Coordination
- Administration of HUD-Funded Programs
    - The Family Self Sufficiency Program
    - Resident Opportunities and Self-Sufficiency (ROSS) Grant Program
    - Elderly & Disabled Services (EDS) Program
    - Jobs Plus at Lincoln Heights Grant Program
- Tax Credit Supportive Services
- Choice Endowment Trust
- ConnectHomeSA Digital Inclusion Program
- Opportunity Home FUndraiser and Nonprofit Management
- Opportunity Home Grant Management
- Opportunity Home Volunteer Program
- Resident Engagement Services
- Resident Council Training and Coordination
- Community-Building Events and Additional Resident Activities

Description of specific examples of uses of MTW funds

- 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 Organization 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.
- Urban Farm: MTW funds are used to provide ongoing maintenance and upkeep at a neighborhood Urban Farm that serves a neighborhood with a lack of adequate, affordable fresh food. This was established as part of the Eastside Choice Neighborhood Grant.

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.

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
TOTAL:	**$68 million**	**$68 million**

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
- Additional Investment in the 100 Labor Street Project - $2.5 million
- Preservation of Affordable Housing - $2 million

Total MTW funds obligated is $68 million.

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 Organization has explored participation in RAD. Currently, the Organization 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).

To be updated after Board adoption

Section VI. B. | Documentation of Public Process

A 30-day public comment period began on Wednesday, Feb. 14, 2024, and ends on Wednesday, March 20, 2024, on the Opportunity Home San Antonio's Proposed 2024 – 2025 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**. All comments are due by 5:00 pm on March 20, 2024.

A Public Hearing of the Board of Commissioners will be held at Opportunity Home, 818 S. Flores St., San Antonio, TX, 78204 prior to 1:00 p.m., commencing on March 20, 2024.

Final document will be updated after the public comment process.

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[2]. 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

[2] 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[3]:

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?

---

[3] 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 FY2025 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. FY2015-2- Elderly Admissions Preference at Select Public Housing Sites
2. FY2022-1- Partnerships Providing Basic Needs for Residents Through Income Exclusions
3. FY2019-2- Alternate Recertification Process (PH and HCV)
4. FY2011-1e- Preservation and Expansion of Affordable Housing
5. FY2011-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services
6. FY2013-4- HQS Inspection of Opportunity Home properties by Opportunity Home inspectors
7. FY2014-3- Faster Implementation of Payment Standard Decreases (HCV)
8. FY2014-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)

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

Section VI. D. | Lobbying Disclosures

To be updated after Board adoption.

Appendix | Additional Items

Appendix A | Public Comments Summary Report

To be updated after Public Comment Period.

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

Indicates policy has been added

~~Indicates policy has been removed~~

Housing Opportunity Through Modernization Act of 2016 (HOTMA)

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law and made numerous changes to statutes governing HUD programs. Title I of HOTMA contains 14 different sections that impact the Public Housing and Section 8 programs, implementing broad changes to income and assets in Sections 102 and 104 of HOTMA and Public Housing program over-income provisions in Section 103. The Final Rule was officially published in the Federal Register on February 14, 2023. On September 29, 2023, HUD issued notice PIH 2023-27, which provided guidance to PHAs on the implementation of the program changes described in the Final Rule.

Opportunity Home will implement the following HOTMA policies on January 1, 2025.

Discrimination Complaints

Reason for Changes to 2.1.C Discrimination Complaints, addition of section 2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20], and 2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]

The following policy updates are to align Opportunity Home's discrimination complaint policies with the HUD Respondent Obligations in Fair Housing Investigations Interactive Diagram, Equal Access Final Rule [Notice PIH 2014-20] and Notice FHEO 2023-01.

~~(6)~~**2.1.C Discrimination Complaints**

(1) General Housing Discrimination Complaints

(a) If an applicant or tenant family believes that any family member has been discriminated against by Opportunity Home, the family should advise Opportunity Home.

(b) Opportunity Home should make every reasonable attempt to determine whether the applicant or tenant family's assertions have merit and take any warranted corrective action.

***

(d) Opportunity Home will attempt to remedy all discrimination complaints made against Opportunity Home.

(e) Applicants or participants who believe that they have been subject to unlawful discrimination may notify Opportunity Home either verbally or in writing.

(f) Within 10 business days of receiving the complaint, Opportunity Home will investigate and attempt to remedy discrimination complaints made against Opportunity Home. Opportunity Home will also advise the family of their right to file a fair housing complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The fair housing poster, posted in conspicuous and accessible locations in Opportunity Home lobbies, will reference how to file a complaint with FHEO. ~~Opportunity Home will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).~~

(g) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions.

2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20]

(1) Notice PIH 2014-20 requires an articulated complaint process for allegations of discrimination under the Equal Access Final rule. The Equal Access Final Rule requires that Opportunity Home provides equal access regardless of marital status, gender identity, or sexual orientation. Opportunity Home will be informed on these obligations by the HUD Field Office or FHEO when an Equal Access complaint investigation begins.

(a) Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify Opportunity Home either orally or in writing.

(b) Within 10 business days of receiving the complaint, Opportunity Home will provide a written notice to those alleged to have violated the rule. Opportunity Home will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

(c) Opportunity Home will attempt to remedy discrimination complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.

(d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

(e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]

(1) A complainant may, not later than one year after an alleged VAWA violation has occurred or terminated, file a complaint with FHEO alleging such violation. If there is a violation that began prior to a year before the complaint is filed, but it continues into the one-year time period, HUD will accept the complaint. FHEO will investigate the complaint if it is timely and FHEO otherwise has jurisdiction. If a complaint is filed more than one year after the alleged violation occurred or terminated, FHEO may, but is not required to, investigate the allegations under the additional authority and procedures described in FHEO 2023-01.

(2) Complaints do not need to allege a violation of the Fair Housing Act for FHEO to accept and investigate the complaint.

(a) Applicants or tenant families who wish to file a VAWA complaint against Opportunity Home may notify Opportunity Home either orally or in writing.

(b) Opportunity Home will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). Opportunity Home will inform the family that no later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.

(c) Opportunity Home will attempt to remedy complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.

(d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

(e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

Family Consent to Release of Information (HUD-9886-A

Reason for Changes to 3.2.D and 7.1.A Family Consent to Release of Information [24 CFR 5.232] and Penalties for Failing to Consent [24 CFR 5.232]

Sections 3.2.D and 7.1.A were updated with new HOTMA requirements regarding the Authorization for Release of Information, form HUD-9886-A. The revised section provides information on penalties for failing to sign the release of financial information to Opportunity Home.

3.2.D Family Consent to Release of Information [24 CFR 5.232]

(1) HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. The consent form remains effective until the family is denied assistance, assistance is terminated, or the family provides written notification to revoke consent.

(2) Opportunity Home must deny admission to the program if any member of the applicant family fails to sign and submit consent forms which allow Opportunity Home to obtain information that Opportunity Home has determined is necessary in administration of the public housing program [24 CFR 960.259(a) and (b)and 24 CFR 5.232(a)].

(3) However, this does not apply if the applicant or participant, or any member of their family, revokes their consent with respect to the ability of Opportunity Home to access financial records from financial institutions, unless Opportunity Home establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)].

(A) Opportunity Home has established a policy that the family's revocation of consent to allow Opportunity Home to access records from financial institutions will result in denial of admission.

7.1 General Verification Requirements

7.1.A Family Consent to Release of Information [24 CFR 982.516 and 982.551, 24 CFR 5.230]

(1) The family must supply any information that Opportunity Home or HUD determines is necessary to the administration of the program and must consent to Opportunity Home verification of that information [24 CFR 982.551].

(2) **Consent Forms**

(a) ~~It is required that a~~ All adult applicants and participants sign form HUD-9886-A, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission.

(b) The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form.

(b) HUD and Opportunity Home may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members.

(c) Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

~~(d) Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.~~

(d) Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. On or after January 1, 2024 (regardless of Opportunity Home's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination.

(e) This form will only be signed once and will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to Opportunity Home to revoke consent. Another Form HUD-9886-A will not be submitted to Opportunity Home except under the following circumstances:

(i) When any person 18 years or older becomes a member of the family;

(ii) When a current member of the family turns 18; or

(iii) As required by HUD or Opportunity Home in administrative instructions.

(f) Opportunity Home has the discretion to establish policies around when family members must sign consent forms when they turn 18. Opportunity Home must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

(i) Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A at the family's next annual or interim reexamination, whichever is earlier.

(3) **Penalties for Failing to Consent [24 CFR 5.232]**

(a) If any family member who is required to sign a consent form fails to do so, Opportunity Home will deny admission to applicants and terminate the lease of tenants. The family may request a hearing in accordance with Opportunity Home's grievance procedures.

(b) The family may request an informal review (applicants) or informal hearing (participants) in accordance with Opportunity Home procedures. However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of Opportunity Home to access financial records from financial institutions, unless Opportunity Home establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)].

(c) Opportunity Home may not process interim or annual reexaminations of income without the family's executed consent forms.

(i) Revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with Opportunity Home policy.

(ii) For a family to revoke their consent, the family must provide written notice to Opportunity Home.

(iii) Opportunity Home will send the family a notice acknowledging receipt of the request and explaining that revocation of consent. Opportunity Home will notify their local HUD office of the written notice.

Use of Other Programs' Income Determinations

Reason for Addition of 7.1.B Use of Other Programs' Income Determinations [24 CFR 5.609(c)(3) and Notice PIH 2023-27

Section 7.1.B was updated to include new HOTMA requirements regarding the use of Safe Harbor determinations. Opportunity Home has opted out of the use of other programs' income determinations.

7.1.B Use of Other Programs Income Determinations [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

(1) Opportunity Home may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. Opportunity Home is not required to accept or use determinations of income from other federal means-tested forms of assistance. If Opportunity Home adopts a policy to accept this type of verification, Opportunity Home must establish in policy when they will accept Safe Harbor income determinations and from which programs. Opportunity Home must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs.

(2) **Means-tested federal public assistance programs include:**

(a) Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);

(b) Medicaid (42 U.S.C. 1396 et seq.);

(c) Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);

(d) Earned Income Tax Credit (EITC) (26 U.S.C. 32);

(e) Low-Income Housing Credit (LIHTC) program (26 U.S.C. 42);

(f) Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);

(g) Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);

(h) Other programs administered by the HUD Secretary;

(i) Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and

(l) Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the Federal Register.

(3) If Opportunity Home elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, Opportunity Home will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by Opportunity Home:

(a) Income determination effective date;

(b) Income determination effective date;

(c) Program administrator's signature date;

(d) Family's signature date;

(e) Report effective date; or

(f) Other report-specific dates that verify the income determination date.

(4) The only information that Opportunity Home is permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by Opportunity Home. Opportunity Home is not permitted to mix and match Safe Harbor income determinations and other income verifications.

(5) If Opportunity Home is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, Opportunity Home must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.

(6) If Opportunity Home uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet Opportunity Home's reporting requirement and occur after the effective date of the transaction.

(7) The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. Opportunity Home is therefore required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.

(8) Opportunity Home will not accept verification from other federal assistance programs. All income will be verified in accordance with the requirements of HUD's verification hierarchy and Opportunity Home policies in this chapter.

EIV Income and IVT Reports

Reason for Addition of 7.1.C EIV Income and IVT Reports

Section 7.1.C includes new HOTMA requirements that allow Opportunity Home to determine when Enterprise Income Verification (EIV) and Income Verification Tool (IVT) reports are required for income verification.

7.1.C Level 5 and 6 Verification: Up-Front Income Verification (UIV)

***

(b) ***EIV Income and IVT Reports***

(i) Opportunity Home is required to obtain an EIV Income and IVT report for each family any time Opportunity Home conducts an annual reexamination. However, Opportunity Home is not required to use the EIV Income and IVT reports: ~~The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between three and six months old at the time reports are generated.~~

(A) At annual reexamination if Opportunity Home used Safe Harbor verification from another means-test federal assistance program to determine the family's income; or

(B) During any interim reexaminations.

(ii) The EIV Income and IVT Reports are also not available for program applicants at admission.

(iii) When required to use the EIV Income Report, in order for the report to be considered current, Opportunity Home Must pull the report within 120 days of the effective date of the annual reexamination.

(iv) The EIV Income Report may be used to verify and calculate income at annual reexamination if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information in EIV.

(ii) Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine a family's annual income, Opportunity Home will obtain EIV income and IVT reports for all annual ~~and interim~~ reexaminations for all families. Reports will be generated as part of the regular reexamination process.

(iii) Opportunity Home will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

(iii) Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV. ~~Income and IVT reports will be compared to family-provided information as part of the annual reexamination process.~~

~~(iv) Income and IVT reports may be used in the calculation of annual income, as described in Chapter 6.1.C.~~

~~(v) Income reports may also be used to meet the regulatory requirement for third-party verification, as described above.~~

~~(vi) Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Section 6.1.C. and in this chapter.~~

~~(vii) Family expense summaries will be used in interim reexaminations for families who report zero income.~~

(iv~~viii~~) Income and IVT reports, and family expense summaries, will be retained in participant files with the applicable annual or interim reexamination documents (if applicable) for the duration of the family's participation..

(v~~ix~~) When Opportunity Home determines through EIV reports and third party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

EIV + Self-Certification

Reason for the Change to 7.1.F EIV + Self-Certification

Section 7.1.F includes language that allows Opportunity Home to accept EIV and a family's self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

7.1.F EIV + Self-Certification

(1) EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and

self-certifies that the amount is accurate and representative of current income.

(2) When calculating income using this method, Opportunity Home may use its discretion to determine which method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.

(3) At annual reexamination, if Opportunity Home is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, Opportunity Home will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

(5) Opportunity Home will use an average of the last two quarters of income listed in EIV to determine income from employment. Opportunity Home will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income.

(6) If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, Opportunity Home will use written third-party verification from the source.

(7) Opportunity Home will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

Self-Certification of Net Family Assets

Reason for the Addition of 7.3.F Net Family Assets Equal to or Less than $50,000

Section 7.3.F adds new HOTMA requirements that allows Opportunity Home to accept self-certification from a family for certification of real property ownership and net assets totaling $50,000 or less. Opportunity Home has opted to accept self-certification for both cases.

7.3.F Net Family Assets

Assets Totaling $50,000 or Less

(1) At admission and reexamination, for families with net assets totaling $50,000 or less (adjusted annually), Opportunity Home may, but is not required to, accept the family's self-certification that the family's

assets do not exceed $50,000 without taking any additional steps to verify the accuracy of the declaration.

(2) The declaration must include the amount of income the family expects to receive from assets which must be included in the family's income. This includes declaring income from checking and savings accounts which, although excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed $50,000), may generate asset income.

(3) Opportunity Home must clarify during the self-certification process which assets are included/excluded from net family assets.

(4) If Opportunity Home chooses to accept self-certification, Opportunity Home is required to obtain third-party verification of all assets, regardless of the amount, at least once every three years.

(5) When net family assets have a total value over $50,000, Opportunity Home may not rely on the family's self-certification.

(a) Third-party verification of assets is required when net family assets exceed $50,000, adjusted annually by HUD.

(b) When verification of assets is required, Opportunity Home is required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.

(6) For families with net assets totaling $50,000 or less, Opportunity Home will accept a family's self-certification of the value of their assets and anticipated asset income.

(a) The family's declaration must show each asset and the amount of income expected from that asset.

(b) All family members 18 years of age and older must sign the family's declaration.

(c) Opportunity Home reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

(7) Any income the family expects to receive from assets will be included in the family's annual income.

(8) Families will be required to provide third-party verification of net family assets every three years.

(9) When verification is required in determining the value of checking or savings accounts, Opportunity Home will use the current balance.

(a) In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, Opportunity Home will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]

(1) Opportunity Home must determine whether a family has present ownership in real property that is suitable for occupancy for purposes of determining whether a family is compliant with the asset limitations.

(2) At admission and reexamination, Opportunity Home may accept a self-certification from the family that the family does not have any present ownership in any real property that is suitable for occupancy.

(a) If the family declares they have present ownership in real property, Opportunity Home must obtain third-party verification.

(3) Both at admission and reexamination, Opportunity Home will accept self-certification from the family that the family does not have any present ownership in any real property.

(4) The certification must:

(a) State that the family does not have any present ownership interest in any real property;

(b) Be signed by all family members 18 years of age and older.

(7) Opportunity Home reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

(8) If the family declares they have a present ownership in real property, Opportunity Homewill obtain third-party verification of the following factors:

(a) Whether the family has the legal right to reside in the property; and

(b) Whether the family has effective legal authority to sell the property; and

(c) Whether the property is suitable for occupancy by the family as a residence.

(9) In cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, Opportunity Home will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

Nonrecurring Income

Reason for the Addition of 7.3.E Nonrecurring Income

Section 7.3.E adds new HOTMA requirements that allow Opportunity Home to accept self-certification from a family for nonrecurring income. Opportunity Home has opted to accept self-certification of this form of payment.

7.3.E Nonreccuring Income

(1) Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income.

(2) Opportunity Home may accept a self-certification from the family stating that the income will not be repeated in the coming year.

(a) Opportunity Home will accept self-certification from the family stating that income will not be repeated in the coming year.

(b) Opportunity Home may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

Third-Party Verification of Social Security Numbers

Reason for Change to 7.2.B Social Security Numbers

Section 7.2.B was updated to include language that allows Opportunity Home to accept third-party verification of an applicant or participant's Social Security Number (SSN) when all other attempts to obtain that information have been unsuccessful.

7.2.B Social Security Numbers [24 CFR 5.216 and Notice PIH 2023-27 ~~2018-24~~]

(1) The family must provide documentation of a valid Social Security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

(2) Note that an individual who previously declared to have eligible immigration status may not change their declaration for the purpose of avoiding compliance with the SSN disclosure and documentation

requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

(~~2~~3) Opportunity Home must accept the following documentation as acceptable evidence of the social security number:

(a) An original SSN card issued by the Social Security Administration (SSA)

(b) An original SSA-issued document, which contains the name and SSN of the individual

(c) An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

(~~3~~4) While Opportunity Home must attempt to gather third-party verification of SSNs prior to admission as listed above, Opportunity Home also has the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if Opportunity Home has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, Opportunity Home must document why the other SSN documentation was not available.

(5) If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then Opportunity Home must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The resident's assistance must be terminated if they fail to provide the required documentation.

(a) Opportunity Home will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

Other Permitted Reasons for Denial of Admission

Reason for Change to 3.3.D Other Permitted Reasons for Denial

Section 3.3.D was updated to allow Opportunity Home to consider the reason for termination of applicant families that have been terminated from federally assisted housing in the last three years when evaluating applicant admission.

3.3.~~D~~E Other Permitted Reasons for Denial Of Admission

(1) HUD permits, but does not require Opportunity Home to deny admission for the reasons discussed in this section.

(2) In making its decision to deny assistance, Opportunity Home will consider the factors discussed in Section 3.3.F. Upon consideration of such factors, Opportunity Home may, on a case-by-case basis, decide not to deny assistance.

***

(4) **Previous Behavior [960.203(c) and (d) and PH Occ GB, p. 48]**

***

(d) Opportunity Home will deny admission to an applicant family if Opportunity Home determines that the family:

(i) Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing programs;

(ii) Owes rent or other amounts to Opportunity Home in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family enters into a repayment agreement upon admission.

(iii) Includes any family member that has been evicted from federally-assisted housing in the last three years.

***

(g) Opportunity Home may deny admission based on the termination reason for family members who have been terminated from federally-assisted housing in the last three years.

Appendix C | Summary of Revisions to the Administrative Plan

<u>**Indicates policy has been added**</u>

~~**Indicates policy has been removed**~~

<u>Housing Opportunity Through Modernization Act of 2016 (HOTMA)</u>

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law and made numerous changes to statutes governing HUD programs. Title I of HOTMA contains 14 different sections that impact the Public Housing and Section 8 programs, implementing broad changes to income and assets in Sections 102 and 104 of HOTMA and Public Housing program over-income provisions in Section 103. The Final Rule was officially published in the Federal Register on February 14, 2023. On September 29, 2023, HUD issued notice PIH 2023-27, which provided guidance to PHAs on the implementation of the program changes described in the Final Rule.

Opportunity Home will implement the following HOTMA policies by January 1, 2025.

<u>Discrimination Complaints</u>

Reason for Changes to Discrimination Complaints and addition of section 2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20], and 2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]

The following policy updates are to align the discrimination complaint policies with the HUD Respondent Obligations in Fair Housing Investigations Interactive Diagram, Equal Access Final Rule [Notice PIH 2014-20] and Notice FHEO 2023-01.

~~(6)~~<u>**2.1.C**</u> **Discrimination Complaints**

(1) **General Housing Discrimination Complaints**

(a) If an applicant or tenant family believes that any family member has been discriminated against by Opportunity Home, the family should advise Opportunity Home.

(b) Opportunity Home should make every reasonable attempt to determine whether the applicant or tenant family's assertions have merit and take any warranted corrective action.

***

(d) Opportunity Home will attempt to remedy all discrimination complaints made against Opportunity Home.

(e) Applicants or participants who believe that they have been subject to unlawful discrimination may notify Opportunity Home either verbally or in writing.

(f) Within 10 business days of receiving the complaint, Opportunity Home will investigate and attempt to remedy discrimination complaints made against Opportunity Home. Opportunity Home will also advise the family of their right to file a fair housing complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The fair housing poster, posted in conspicuous and accessible locations in Opportunity Home lobbies, will reference how to file a complaint with FHEO. ~~Opportunity Home will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).~~

(g) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions.

2.1.D Complaints under the Equal Access Final Rule [Notice PIH 2014-20]

(1) Notice PIH 2014-20 requires an articulated complaint process for allegations of discrimination under the Equal Access Final rule. The Equal Access Final Rule requires that Opportunity Home provides equal access regardless of marital status, gender identity, or sexual orientation. Opportunity Home will be informed on these obligations by the HUD Field Office or FHEO when an Equal Access complaint investigation begins.

(a) Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify Opportunity Home either orally or in writing.

(b) Within 10 business days of receiving the complaint, Opportunity Home will provide a written notice to those alleged to have violated the rule. Opportunity Home will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

(c) Opportunity Home will attempt to remedy discrimination complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.

(d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

(e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions (See Chapter 16).

2.1.E VAWA Complaint Processing [Notice FHEO 2023-01]

(1) A complainant may, not later than one year after an alleged VAWA violation has occurred or terminated, file a complaint with FHEO alleging such violation. If there is a violation that began prior to a year before the complaint is filed, but it continues into the one-year time period, HUD will accept the complaint. FHEO will investigate the complaint if it is timely and FHEO otherwise has jurisdiction. If a complaint is filed more than one year after the alleged violation occurred or terminated, FHEO may, but is not required to, investigate the allegations under the additional authority and procedures described in FHEO 2023-01.

(2) Complaints do not need to allege a violation of the Fair Housing Act for FHEO to accept and investigate the complaint.

(a) Applicants or tenant families who wish to file a VAWA complaint against Opportunity Home may notify Opportunity Home either orally or in writing.

(b) Opportunity Home will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). Opportunity Home will inform the family that, no later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.

(c) Opportunity Home will attempt to remedy complaints made against Opportunity Home and will conduct an investigation into all allegations of discrimination.

(d) Within 10 business days following the conclusion of Opportunity Home's investigation, Opportunity Home will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

(e) Opportunity Home will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

Family Consent to Release of Information (HUD-9886-A)

Reason for the Change to 7.1.A Family Consent to Release of Information

Section 7.1.A was updated to include new HOTMA requirements regarding the Authorization for Release of Information, form HUD-9886-A, and its requirements. The revised section provides information on penalties for failing to sign the release of financial information to Opportunity Home.

7.1 General Verification Requirements

7.1.A Family Consent to Release of Information [24 CFR 982.516; 982.551; 24 CFR 5.230; and Notice PIH 2023-27]

(1) The family must supply any information that Opportunity Home or HUD determines is necessary to the administration of the program and must consent to Opportunity Home verification of that information [24 CFR 982.551].

(2) **Consent Forms**

(a) ~~It is required that a~~ All adult applicants and participants must sign form HUD-9886-A, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission.

(b) The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form.

(~~c~~b) HUD and Opportunity Home may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members.

(d~~c~~) Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

~~(d) Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.~~

(e) Prior to January 1, 2024, participants signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. On or after January 1, 2024 (regardless of Opportunity Home's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination.

(f) This form will only be signed once and will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to Opportunity Home to revoke consent. Another Form HUD-9886-A will not be submitted to Opportunity Home except under the following circumstances:

(i) When any person 18 years or older becomes a member of the family;

(ii) When a current member of the family turns 18; or

(iii) As required by HUD or Opportunity Home in administrative instructions.

(g) Opportunity Home has the discretion to establish policies around when family members must sign consent forms when they turn 18. Opportunity Home must establish policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

(i) Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A at the family's next annual or interim reexamination, whichever is earlier.

(3) **Penalties for Failing to Consent [24 CFR 5.232]**

(a) If any family member who is required to sign a consent form fails to do so, Opportunity Home ~~will~~ must deny admission to applicants and terminate assistance of participants.

(b) The family may request an informal review (applicants) or informal hearing (participants) in accordance with Opportunity Home procedures. However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with the respect to the ability of Opportunity Home to access financial records from financial institutions, unless Opportunity Home establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)].

(c) Opportunity Home may not process interim or annual reexaminations of income without the family's executed consent forms.

(i) Revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with Opportunity Home policy.

(ii) For a family to revoke their consent, the family must provide written notice to Opportunity Home.

(iii) Opportunity Home will provide the family a notice acknowledging receipt of the request and explain the consequences of revocation of consent. Opportunity Home will notify the local HUD office of the written notice.

Use of Other Programs' Income Determinations

Reason for the Addition of 7.1.B Use of Other Programs' Income Determinations

Section 7.1.B was updated to include new HOTMA requirements regarding the use of Safe Harbor determinations. The new section provides information on the allowed means-tested federal public assistance programs Opportunity Home can accept and their use for income determination.

7.1.B Use of Other Programs' Income Determinations [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

(1) **Safe Harbor Determinations**

(a) Opportunity Home may, but is not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs.

(b) If Opportunity Home adopts a policy to accept this type of verification, Opportunity Home must establish in policy when Safe Harbor income determinations and from which programs will be accepted.

(c) Means-tested federal public assistance programs include:

- (i) Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);
- (ii) Medicaid (42 U.S.C. 1396 et seq.);
- (iii) Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);
- (iv) Earned Income Tax Credit (EITC) (26 U.S.C. 32);
- (v) Low-Income Housing Credit (LIHTC) program (26 U.S.C. 42);
- (vi) Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);
- (vii) Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);
- (viii) Other programs administered by the HUD Secretary;
- (ix) Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and
- (x) Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the Federal Register.

(d) If Opportunity Home elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, Opportunity Home must obtain the income information by means of a third-party verification.

(e) Third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type.

(f) Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, Opportunity Home will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618.

(g) The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by Opportunity Home:

(i) Income determination effective date;

(ii) Program administrator's signature date;

(iii) Family's signature date;

(iv) Report effective date; or

(v) Other report-specific dates that verify the income determination date.

(h) Opportunity Home is only permitted to use the total income determination made by the federal means-tested program administrator to determine income under the Safe Harbor method.

(i) Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by Opportunity Home.

(ii) Opportunity Home is not permitted to mix and match Safe Harbor income determinations and other income verifications.

(i) If Opportunity Home is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, Opportunity Home must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.

(j) If Opportunity Home uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet Opportunity Home's reporting requirement and occur after the effective date of the transaction.

(k) When available and applicable, Opportunity Home will accept other program's Safe Harbor determinations of income at annual and interim reexaminations to determine the family's total annual income.

(i) Prior to using any Safe Harbor determination from another program, Opportunity Home will verify with the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, Opportunity Home will obtain third-party verification of all sources of income and assets (as applicable).

(ii) With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) and the Earned Income Tax Credit (EITC) programs, Opportunity Home will accept Safe Harbor determinations from any of the programs listed above.

(iii) In order to be acceptable, the income determination must:

(A) Be dated within 12 months of the dates listed above;

(B) State the family size

(C) Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and

(D) Must state the amount of the family's annual income.

(iv) The determination need not list each source of income individually.

(l) If Opportunity Home does not receive any acceptable income determination documentation or is unable to obtain documentation, Opportunity Home will revert to third-party verification of income for the family.

(m) Opportunity Home will use the most recent income determination when presented with multiple verifications from the same or different acceptable Safe Harbor programs, unless the family presents acceptable evidence that Opportunity Home should consider an alternative verification from a different Safe Harbor source.

(n) When Opportunity Home uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to Opportunity Home. Depending on when the change occurred, the change may or may not impact the Opportunity Home's calculation of the family's total annual income.

(i) Changes that occur between the time Opportunity Home receives the Safe Harbor documentation and the effective date of the family's annual reexamination will not be considered.

(ii) If the family has a change in income that occurs after the annual reexam effective date, Opportunity Home will conduct an interim reexam if the change meets the requirements for performing an interim reexamination as outlined in Chapter 11.

(A) In these cases, Opportunity Home will use third-party verification to verify the change.

EIV Income and IVT Reports

Reason for the Change to 7.1.C(3) Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

Section 7.I.C includes new HOTMA requirements that allow Opportunity Home to determine when Enterprise Income Verification (EIV) and Income Verification Tool (IVT) reports are required for income verification.

7.1.C Up-Front Income Verification (UIV)

***

(3) **Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)**

***

(c) **EIV Income and IVT Reports**

(i) Opportunity Home is required to obtain an EIV Income and IVT report for each family any time Opportunity Home conducts an annual reexamination. However, Opportunity Home is not required to use the EIV Income and IVT reports: ~~The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between three and six months old at the time reports are generated.~~

(A) At annual reexamination if Opportunity Home used Safe Harbor verification from another means-tested federal assistance program to determine the family's income; or

(B) During any interim reexaminations.

(ii) The EIV Income and IVT Reports are also not available for program applicants at admission.

(iii) When required to use the EIV Income Report, in order for the report to be considered current, Opportunity Home must pull the report within 120 days of the effective date of the annual reexamination.

(iv) The EIV Income Report may be used to verify and calculate income at annual reexamination if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information of EIV.

(v) Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine a family's annual income, Opportunity Home will obtain EIV income and IVT reports for all annual ~~and interim~~ reexaminations for all families. Reports will be generated as part of the regular reexamination process.

(vi) Opportunity Home will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

(vii) Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV. ~~Income and IVT reports will be compared to family-provided information as part of the annual reexamination process.~~

~~(iv) Income and IVT reports may be used in the calculation of annual income, as described in Chapter 6.1.C.~~

~~(v) Income reports may also be used to meet the regulatory requirement for third-party verification, as described above.~~

~~(vi) Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Section 6.1.C. and in this chapter.~~

~~(vii) Family expense summaries will be used in interim reexaminations for families who report zero income.~~

(viii) Income and IVT reports, and family expense summaries, will be retained in participant files with the applicable annual or interim reexamination documents (if applicable) for the duration of the family's participation..

(ix) When Opportunity Home determines through EIV reports and third party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

EIV + Self-Certification

Reason for the Change to 7.1.F EIV + Self-Certification

Section 7.1.F includes language that allows Opportunity Home to accept EIV and a family's self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

7.1.F EIV + Self-Certification

(1) EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and self-certifies that the amount is accurate and representative of current income.

(2) When calculating income using this method, Opportunity Home may use its discretion to determine which method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.

(3) At annual reexamination, if Opportunity Home is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, Opportunity Home will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

(5) Opportunity Home will use an average of the last two quarters of income listed in EIV to determine income from employment. Opportunity Home will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income.

(6) If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, Opportunity Home will use written third-party verification from the source.

(7) Opportunity Home will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

Nonrecurring Income

Reason for the Addition of 7.3.E Nonrecurring Income

Section 7.3.E adds new HOTMA requirements that allow Opportunity Home to accept self-certification from a family for nonrecurring income. Opportunity Home has opted to accept self-certification.

7.3.E Nonreccuring Income [Notice PIH 2023-27]

(1) Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income.

(2) Opportunity Home may accept a self-certification from the family stating that the income will not be repeated in the coming year.

(a) Opportunity Home will accept self-certification from the family stating that income will not be repeated in the coming year.

(b) Opportunity Home may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

Self-Certification of Net Family Assets

Reason for the Addition of 7.3.F Net Family Assets Equal to or Less than $50,000

Section 7.3.F adds new HOTMA requirements that allow Opportunity Home to accept self-certification from a family for certification of real property ownership and net assets totaling $50,000 or less. Opportunity Home has opted to accept self-certification for both cases.

7.3.F Net Family Assets

Assets Totaling $50,000 or Less

(1) At admission and reexamination, for families with net assets totaling $50,000 or less (adjusted annually), Opportunity Home may, but is not required to, accept the family's self-certification that the family's assets do not exceed $50,000 without taking any additional steps to verify the accuracy of the declaration.

(2) The declaration must include the amount of income the family expects to receive from assets which must be included in the family's income. This includes declaring income from checking and savings accounts which, although excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed $50,000), may generate asset income.

(3) Opportunity Home must clarify during the self-certification process which assets are included/excluded from net family assets.

(4) If Opportunity Home chooses to accept self-certification, Opportunity Home is required to obtain third-party verification of all assets, regardless of the amount, at least once every three years.

(5) When net family assets have a total value over $50,000, Opportunity Home may not rely on the family's self-certification.

(a) Third-party verification of assets is required when net family assets exceed $50,000, adjusted annually by HUD.

(b) When verification of assets is required, Opportunity Home is required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.

(6) For families with net assets totaling $50,000 or less, Opportunity Home will accept a family's self-certification of the value of their assets and anticipated asset income.

(a) The family's declaration must show each asset and the amount of income expected from that asset.

(b) All family members 18 years of age and older must sign the family's declaration.

(c) Opportunity Home reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

(7) Any income the family expects to receive from assets will be included in the family's annual income.

(8) Families will be required to provide third-party verification of net family assets every three years.

(9) When verification is required in determining the value of checking or savings accounts, Opportunity Home will use the current balance.

(a) In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, Opportunity Home will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]

(1) Opportunity Home must determine whether a family has present ownership in real property that is suitable for occupancy for purposes of determining whether a family is compliant with the asset limitations.

(2) At admission and reexamination, Opportunity Home may accept a self-certification from the family that the family does not have any present ownership in any real property that is suitable for occupancy.

(a) If the family declares they have present ownership in real property, Opportunity Home must obtain third-party verification.

(3) Both at admission and reexamination, Opportunity Home will accept self-certification from the family that the family does not have any present ownership in any real property.

(4) The certification must:

(a) State that the family does not have any present ownership interest in any real property;

(b) Be signed by all family members 18 years of age and older.

(5) Opportunity Home reserves the right to require additional verification in

situations where the accuracy of the declaration is in question.

(6) If the family declares they have a present ownership in real property, Opportunity Home will obtain third-party verification of the following factors:

(a) Whether the family has the legal right to reside in the property; and

(b) Whether the family has effective legal authority to sell the property; and

(c) Whether the property is suitable for occupancy by the family as a residence.

(7) In cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, Opportunity Home will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

Third-Party Verification of Social Security Numbers

Reason for the Change to 17.2.A Social Security Number Documentation

Section 17.2.A was updated to include language that allows Opportunity Home to accept third-party verification of an applicant or participant's Social Security Number (SSN) when all other attempts to obtain that information have been unsuccessful.

17.2 Documentation

17.2.A Social Security Number Documentation: [24 CFR 5.216]

(1) Opportunity Home must request the applicant and participant (including each member of the household), who are not exempt (reference Section 17.I.A), to provide documentation of each disclosed SSN. Acceptable evidence of the SSN consists of:

(a) An original SSN card issued by SSA;

(b) An original SSA-issued document, which contains the name and SSN of the individual; or

(c) An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

(2) All applicants and participants, including each member of the household (with the exception of those individuals noted in Section 17.I.A) are required to disclose their assigned SSN.

(3) While Opportunity Home must attempt to gather third-party verification of SSNs prior to admission, Opportunity Home also has the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if Opportunity Home has exhausted all other attempts to obtain the documentation.

(4) If verifying an individual's SSN using this method, Opportunity Home must document why the other SSN documentation was not available.

(5) If the participant SSN is verified in EIV, then no further verification is required.

(6) If the participant SSN fails the SSA identity match, then Opportunity Home must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the following:

(a) Name of the individual,

(b) Social Security Number, and

(b) Identifying information of the individual

(7) Failure to provide the required documentation after a failed SSA identity match must result in the participant's termination.

(a) Opportunity Home will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

Other Permitted Reasons for Denial of Admission

Reason for the Change to 3.3.D Other Permitted Reasons for Denial of Admission

Section 3.3.D was updated to allow Opportunity Home to consider the reason for an applicant families termination from federally assisted housing in the last three years when evaluating applicant admission.

3.3.D Other Permitted Reasons for Denial of Admission

***

(4) **Previous Behavior in Assisted Housing [24 CFR 982.552(c)]**

***

(a) Opportunity Home will deny assistance to an applicant family for the following reasons:

(i) The family does not provide information that Opportunity Home or HUD determines is necessary in the administration of the program.

(ii) The family does not provide complete and true information to Opportunity Home.

(iii) Any family member has been evicted from federally-assisted housing in the last three years.

(iv) Any PHA has terminated housing assistance for any member of the family in the past three years.

***

(b) Opportunity Home may deny admission based on the termination reason for family members who have been terminated from federally-assisted housing in the last three years.

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

There are no proposed 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 Organization 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 organization 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 organization.

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 Organization plans to invest approximately $71 million in capital repairs to extend the useful life at 24 properties and approximately 3,904 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 2025 - FY 2029).

Fiscal Year (FY)[4] Capital Fund Grant Year (CFP)	Property	Units Preserved[5]	Description	Planned Investment ($)
FY 2023-24 CFP20-23 (Current)	PHA Wide		Ph.II Intrusion Protection/Security Cameras	2,000,000
	Alazan-Apache	000	Admin Bldg. Roof/Foundation	581,000
	Blanco	100	Housing Related Hazard Improv	2,500,000
	Blanco	100	Burn Restoration	500,000
	Cassiano	499	Lead Based Paint Project / PNA Substantial Renovations	6,800,00
	Fair Avenue	216	Elevator Modernization	1,000,000
	Highview	68	PNA Substantial Renovations	3,700,000
	Lincoln Heights	338	PNA Substantial Renovations	1,000,000
	Lincoln Heights	338	Lead Based Paint Project	4,700,000
	Matt Garcia	55	Housing Related Hazard Improv	2,000,000

[4] Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2025 begins on July 1, 2022 and ends on June 30, 2025. Capital grants are awarded to Opportunity Home SA every year. Opportunity Home SA then allocates funds based on capital needs.

[5] 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.

[6] Funding sources may be a combination of Capital grants, MTW, sale net proceeds, insurance proceeds, city housing bond funds and federal earmark funds.

	Matt Garcia	55	Burn Restoration	500,000
	Mission Park	100	Lead Based Paint Project	TBD
	Olive Park	26	PNA Substantial Improvements	1,500,000
	Riverside	74	Lead Based Paint Project	700,000
	Riverside	74	PNA Substantial Renovations	TBD
	Springview	180	S&S Solar Lights, Security Cameras	140,000
	Springview	180	Drainage Improvements / Roof Replacement / HVAC	800,000
	Victoria Plaza	185	Roof Replacement	4,000,000
	Villa Hermosa	66	Burn Restoration	100,000
	Villa Tranchese	201	S&S Camera, Intrusion Control System	120,000
	Village East	24	PNA Substantial Renovations	1,500,000
		2879		**27,341,000**
FY 2024-25 CFP24[7]	Morris Beldon	35	PNA Substantial Renovation	1,200,000
	Park Square	26	PNA Substantial Renovation	1,700,000
	Villa Hermosa	66	PNA Substantial Renovation	2,300,000
		127		**5,200,000**
FY 2025-26 CFP25	Fair Avenue	216	PNA Substantial Renovation	8,200,000
	Francis Furey	66	PNA Substantial Renovation	2,125,000
		282		**10,325,000**
FY 2026-27 CFP26	Tarry Towne	98	PNA Substantial Renovation	4,800,000
	Villa Tranchese	201	PNA Substantial Renovation	12,000,000
		299		**16,800,00**
FY 2027-28 CFP27	Jewett Circle	75	PNA Substantial Renovation	2,300,000
	Westway	152	PNA Substantial Renovation	6,800,000
		227		**9,100,000**
FY 2028-29 CFP28	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
		90		**2,170,000**
GRAND TOTAL		**3,904**		**70,936,000**

1. B. Beacon Communities Five Year Capital Improvement Plan

In the coming years, the Organization plans to invest approximately $22 million in capital repairs to extend the useful life at 22 properties and approximately 3,458 units in the Beacon Communities portfolio. In addition, this portfolio will be expanded as properties in the Organization's Partnership portfolio come to the end of their 15-year affordability period and

[7] The capital plan 2024-2028 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.

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[8]	Property	Units Preserved[9]	Description	Planned Investment ($)[10]
2024-2025	Burning Tree	108	Repair unit balconies	$129,233
	Woodhill	532	Replacement or repair of parking lots (resurface & stripe), siding, windows, and sliding glass doors	$6,774,078
	Cottage Creek (I & II)	449	Replacement or repair of A/C units, parking lots (resurface & stripe), sidewalks, gutters, and fencing	$1,740,069
	Pecan Hill	100	Elevator modernization & foundation repairs	$564,555
	San Alfonso	29	Replacement or repair of roofs, decking, soffits, trim, gates, and parking lots	$106,000
	Dietrich Road	30	Replacement or repair of roofs, decking, soffits, trim, patios, siding, windows, and parking lots	$650,000
		1,248	**TOTAL**	**$9,963,935**
2025-2026	Pecan Hill	100	Replacement or repair of roofs, decking, soffits, trim, parking lots (resurface & stripe), and A/C Units	$650,000
	Sunshine	100	Parking Lot repair, reseal, and stripe	$150,000
	Reagan West	15	Replacement or repair of roofs, decking, soffits, trim, and parking lots (resurface & stripe)	$170,000
	Bella Claire	67	Replacement or repair of parking lots (resurface & stripe), fencing, signage, and A/C units	$460,000
	Courtland Heights	56	Repair retaining wall, drainage system, and patios. Replace or repair exterior paint, paint railings, and parking lots (resurface & stripe).	$1,100,000

[8] Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2025 begins on July 1, 2024 and ends on June 30, 2025.

[9] 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.

[10] 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.

		338	**TOTAL**	**$2,530,000**
2026-2027	Encanta Villa	56	Repair of playground and signage	$45,000
	Homestead	157	Property Rehab will include roof replacement, windows, siding, exterior paint, and parking lots (repair, resurface, stripe)	$3,000,000
	Rosemont at Highland Park	252	Replacement or repair roofs, exterior paint, fencing, and parking lots (resurface & stripe).	$950,000
	Costa Valencia	230	Replacement or repair roofs, exterior paint, fencing, and parking lots (resurface & stripe).	$850,000
	Crown Meadows	192	Replacement or repair roofs, exterior paint, pool, and parking lots (resurface & stripe).	$350,000
	Villa de Valencia	104	Property Rehab will include roof replacement, windows, boilers (water heaters), retaining walls, exterior paint, and pool.	$3,200,00
		991	**TOTAL**	**$5,195,000**
2027-2028	Converse Ranch I	124	Replacement or repair drainage, and parking lot (resurface & stripe)	$350,000
	The Alhambra	140	Replacement or repair of exterior paint, railings, roofs, community room upgrades, and elevators.	$650,000
	San Juan I	143	Replacement or repair of perimeter fencing, roofs, and parking lots (resurface & stripe)	$800,000
	San Juan II	144	Replacement or repair of perimeter fencing, roofs, and parking lots (resurface & stripe)	$800,000
	Castle Point	220	Replacement or repair of parking lost (resurface & stripe), pool resurface, and basketball court rehab	$250,000
		771	**TOTAL**	**$2,850,000**
2028-2029	Refugio Place	210	Replacement or repair of A/C units, drywall, entry doors, roofs, fencing, and parking lots (resurface & stripe)	$2,000,000
	Castle Point	220	Replacement or repair of retaining wall, tennis court, lights, and fencing	$250,000
	Cottage Creek (I & II)	449	Replacement or repair of playground equipment	$75,000
	Woodhill	532	Replacement or repair of playground equipment	$75,000
	Villa de Valencia	104	Replacement or repair of playground equipment	$40,000
		1,515	**TOTAL**	**$2,440,000**
Grand Total		**3,458**		**$22,978,935**

Fiscal Year[11]	Property	Units Preserved[12]	Description	Planned Investment ($)[13]
2023-2024[14]	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 of 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 sign / Repair of parking lots and retaining wall	214,000
	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	188,000

[11] Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2025 begins on July 1, 2024 and ends on June 30, 2025.

[12] 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.

[13] 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.

[14] The capital plan 2025-2029 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.

			of fencing, paint trim, railings	
	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
		3,196	**TOTAL**	**18,955,000**
2024-2025	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
		424	**TOTAL**	**3,520,000**
2025-2026	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
		415	**TOTAL**	**100,000**
2026-2027	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
		882	**TOTAL**	**1,885,000**
2027-2028	San Alfonso	29	Parking, fencing, and signage	55,000
	Courtland	56	Paint exterior, parking lots, trees, and paint railings	450,000
	Refugio	210	Fencing, parking lots, exterior, roofs	2,000,000
	O'Connor	150	Fencing, paint trim, and railings	165,000
	Science Park	120	Fencing, paint trim, and railings	165,000
		565	**TOTAL**	**2,835,000**

GRAND TOTAL	5,482	27,295,000

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-notices/

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	PH/ PBV	30%	40%	50%	60%	70 %	80%	Mar ket
100 Labor[1,2]	D1	Franklin	HUD 221(d)(4)	52,438,321	213	0	27		17	0		0	169
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
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
Total				**285,537,519**	**1,260**	**0**	**61**	**35**	**155**	**456**	**151**	**104**	**298**

[1]Opportunity Home owned land

[2]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.

Project Name	District	Developer	Financing	Total Development Cost ($)	Total Units	AMI LEVEL PH/ PBV	30%	40%	50%	60%	70%	80%	Market
Fiesta Trails[2]	D8	NRP	9% Tax Credits	21,112,430	60	0	18	0	12	30	0	0	0
Vista at Silver Oaks		Atlantic Pacific Comm.	9% Tax Credits	24,183,539	76	0	8	0	23	45	0	0	0
Vista at Reed	D6	Atlantic Pacific Comm.	9% Tax Credits	22,000,428	70	0	7	0	19	44	0	0	0
Palo Alto	D4	Streamline	4% Tax Credits & Bonds	67,848,057	336	0	16	16	32	244	28	0	0
Potranco	D4	Lynd	Conventional Loan	67,914,812	360	0	0		0	36		144	180
Snowden Road[12]	D7	Opportunity Home	9% Tax Credits	34,700,554	135	54	14		26	41		0	0
Total				**237,759,820**	**1037**	**54**	**63**	**16**	**112**	**440**	**28**	**144**	**180**

[1]Opportunity Home owned land
[2]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

Opportunity Home has no new projects under this category.

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[1]	D2	TBA	TBA	TBA	TBA	0	0	0	0	0	0	0	0
Victoria Commons - North Pond[1]	D1	Catellus	4% Tax Credits and Bonds	41,550,846	110	0	12	0	0	98	0	0	0
Fields at Somerset	D4	Cohen Esrey	4% Tax Credit & Bonds	92,679,102	350	0	0	0	0	350	0	0	0
Augustine @ Palo Alto	D4	Louis Poppoon	4% Tax Credit & Bonds	81,179,517	348	0	52	0	0	174	122	0	0

Phase [1]		Development Consulting											
Augustine @ Palo Alto Phase [2]	D4	Louis Poppoon Development Consulting	4% Tax Credit & Bonds	84,260,546	372	0	56	0	0	186	130	0	0
Total				**299,670,011**	**1,180**		**120**			**808**	**252**	**0**	**6**

[1]Opportunity Home owned land
[2]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	PH/ PBV	30 %	40%	50 %	60 %	70 %	80 %	Market
Victoria Commons - South Pond[1]	D1	Catellus	TBD	TBD	TBD								TBD
Victoria Commons - Townhomes[1]	D1	Catellus	TBD	TBD	TBD								TBD
Alazan Expansion[1,2]	D5	Opportunity Home	MTW/CoSA Bonds	28,116,444	88		88						
Total				**28,116,444**	**88**	**0**	**88**	**0**			**0**	**0**	**0**

[1]Opportunity Home owned land
[2]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

Opportunity Home does not have any pending planned construction pending board consideration

ALAZAN COURTS REDEVELOPMENT PLAN

The Organization 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 wil 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.

VC YMCA BUILDING

Currently in the pre development phase. HUD has approved the disposition application and 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 organization 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 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. 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 Organization may elect to invest MTW funds in accordance with the Organization'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 Organization 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
- Elan Gardens
- Hemisview Village
- San Juan Square I
- Sutton Oak I

Project Name	District	Type of Tax Credit	Proposed Action	Total Units	PH/ PBV	30%	40%	50%	60%	70%	80%	Market
Alhambra	D4	9% Tax Credits	Refinance / Acquisition 2024	140	0	14	0	0	120	0	0	0
Artisan at Creekside	D5	4% Tax Credits & Bonds	Refinance / Acquisition 2024	252	0	0	0	0	252	0	0	0
Artisan at Mission Creek	D4	4% Tax Credits & Bonds	Refinance / Acquisition 2024	252	0	0	0	0	252	0	0	0
Elan Gardens	D1	4% Tax	Refinance /	228	0	0	0	0	228	0	0	0

		Credits & Bonds	Acquisition 2024									
Hemisview Village	D1	4% Tax Credits & Bonds	Refinance / Acquisition 2025	245	49	0	0	12	184	0	0	0
San Juan Square I	D5	9% Tax Credit	Refinance / Acquisition 2024	143	46	0	0	0	91	0	0	6
Sutton Oaks I	D2	9% Tax Credit	Refinance / Acquisition 2025	194	49	0	0	28	109	0	0	8

3. B. Other Acquisitions

The Organization has no active acquisition plans.

4. Dispositions | Asset Disposition Plans

The Organization 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 108019	331 LAVACA ST 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 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	Eastside Lots - possible home ownership
380324	939 POINSETTIA	
380325	943 POINSETTIA	
380357	906 N GRIMES	
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 F 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 611 SW 28th 307 Marshall 102 South Rio Grande	Sprint Spectrum Realty Company, LLC Avance Sprint Spectrum Realty Company, LLC Miller Child Development Center INC
	411 Barrera	Cellco Partnership d/b/a Verizon Wireless

Appendix G | Alternative Definition to Self-Sufficiency

Update: The alternative definition was proposed and approved as part of the FY2024 MTW Planning process. The organization will begin reporting these measures in the forthcoming FY2024 Report. This report will be submitted on September 30, 2024.

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.

SS #8: Households Transitioned to Self Sufficiency
Unit of Measurement

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"[15], 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?"

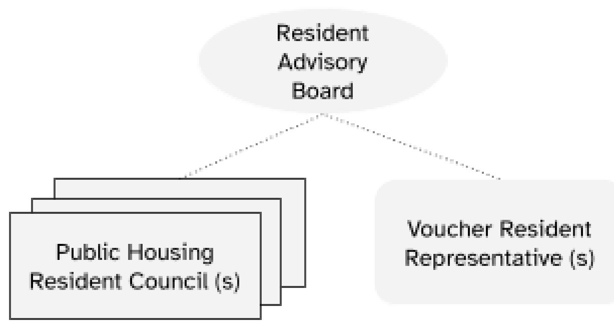
[15] https://selfsufficiencystandard.org/
https://public.tableau.com/app/profile/selfsufficiencystandard/viz/AllStates2021/SSS2021
https://www.mass.gov/doc/accs-self-sufficiency-matrix-0/download

Appendix H | 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 organized and supported by the organization's Policy and Planning Department. The intent is to bring existing resident council members and voucher representatives together to participate in and have a meaningful voice in the creation of the annual MTW plan and ongoing strategic plan strategies.

Proposed Structure



Public Housing Resident Council(s): a duly elected council made up of residents from one or more properties that follow all HUD rules and requirements. [insert reference]. Council members are elected and must follow HUD rules on tenant participation. The councils are supported by the Department of Resident Services. The organization in consultation with existing resident councils may pursue a jurisdiction-wide resident council which may be appointed to participate in annual resident advisory board meetings instead of all resident council members.

Voucher Resident Representative(s): appointed voucher participants that reflect and represent the diversity of all voucher residents. Appointments are made by Opportunity Home either through voucher holders volunteering and/or direct outreach by the organization.

Resident Advisory Board: a group 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. The Resident Advisory Board is organized and facilitated by the Policy & Planning Department.

Proposed Annual Calendar

Phase	PHA Tasks	Timeline
Preparation to	• Gather information to develop the Plan	July 1 - Sept 30

develop the plan	• Establish the Resident Advisory Board and begin meeting	
Plan development and drafting	• Share latest resident survey results with the RAB • Share latest MTW Report with the RAB • Consult with the RAB on community needs, resources, and PHA policies • Draft proposed plan	Oct 1 - Dec 31
Public Hearing Notice & Comment Period	• Plan public hearing • Make proposed plan available on website and to RAB during the 30 day comment period • Consult with the RAB on proposed plan	February 14 - March 15 (30 days)
Public Hearing	• Hold open resident briefings • Hold Public Hearing at March Operations Committee Meeting • Obtain written recommendations from the RAB • Obtain written feedback from resident briefings • Obtain written feedback from the public • Revise Plan, as needed	March
Submission	• Submit proposed plan to the MTW HUD Office	April 15
HUD Review	• Make approved plan available on website and to the RAB	April 15 - June 30

OPPORTUNITY™ HOME SAN ANTONIO

A COMMUNITY OF POSSIBILITIES