

Annual **MTW PLAN**

Fiscal Year 2025-2026

July 1, 2025 to June 30, 2026

Formerly San Antonio Housing Authority



Document submission date:

MTW Plan DRAFT Released For Public Comment: February 27, 2025

MTW Plan DRAFT Submitted to HUD for review: Month X, 2025

Final MTW Plan Submitted to HUD for approval: Month X, 2025

Final MTW Plan Approved by HUD: Month X, 2025



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

Opportunity Home San Antonio provides housing to over 65,500 children, adults, and seniors through four housing portfolios – Public Housing, Housing Choice Vouchers, Affordable Housing Communities, and other communities in partnership with non-profit entities and other agencies. Opportunity Home currently employs over 500 people and has a total annual operating budget of \$255 million. Existing real estate assets are valued at over \$825 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 Statements

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



Long-term Priority Outcomes

The strategic plan focuses on priority outcomes for three key populations: current and potential 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 various stages of implementation, including active, under discussion, or in development. The list also incorporates five priorities recently identified by the Board of Commissioners:

- Development, partnership, and voucher strategy
- Maintenance and resident safety
- Past due rent
- Waitlist
- Communication strategy

Resident Outcomes

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
 - 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
- 6. Residents experience compassionate customer service that relieves suffering and improves their quality of life
 - a. Residents experience effective service
 - b. Residents experience simple and easy service
 - c. Residents experience clear and accessible service
 - d. Residents experience efficient service
 - e. Residents experience equitable service
 - f. Residents experience warm and professional service

Residents behind on rent

- 1. Residents behind on rent have meaningful housing choice
- 2. Protected class / identify of residents behind on rent does not determine housing assistance or support service outcomes
- 3. Residents behind on rent experience compassionate customer service

Waitlist households outcomes

- 1. Waitlist households secure housing assistance quickly
- 2. Waitlist ELI households (<30% AMI) have meaningful housing choice
- 3. Waitlist household race does not determine housing assistance or support service outcomes

Other low-income household outcomes

- 1. ELI (<30% AMI) households [who are not currently residents or on waitlist] have meaningful housing choice

Employee Outcomes

- 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
3. Employees' internal customer experience is compassionate, improves work experience, and supports a good work life balance
- a. Employees experience effective service
 - b. Employees experience simple and easy service
 - c. Employees experience clear and accessible service
 - d. Employees experience efficient service
 - e. Employees experience equitable service
 - f. Employees experience warm and professional service

Community Outcomes

1. Community trusts Opportunity Home
- a. Public opinion and narrative of us is positive
 - b. Community provides guidance for policy and procedure
 - c. Community has a direct focal point to engage with the organization
 - d. New potential partners learn about opportunities to serve residents
 - e. External audiences receive a consistent message
 - f. Neighbors (community) in adjacent apartments walk more / feel safer to walk / use park more
2. Community invests in Opportunity Home's mission
- a. Partners value robust partnerships with Opportunity Home
 - b. Employees are aware of internal news and information
 - c. Employees are ambassadors for the organization
 - d. Policymakers create public policy that benefits org and residents
 - e. Secure annual allocation from local and state gov budgets
 - f. Community is aware of Opportunity Home resources and programs (successes) through Resident ambassador outreach
 - g. Resident ambassadors communicate their story to Community
 - h. Partners and service providers easily identify populations, properties, and/or programs to work with and/or invest in



3. [Sustainability]: Community's economy and health outcomes are sustained and improved for future generations
 - a. TBD

Priority Monitoring

1. Income generated
2. Utilization & Occupancy
3. MTW STS Compliance
4. 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

Strategy Management

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	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Total Public Housing Units to be Added in the Plan Year: 0

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

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

If “Population Type” is “Other” please describe:

NA

Section II. A. ii. Planned Public Housing Units to be Removed

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
NA	NA	NA

TOTAL: 0

Public Housing Units to be Removed in the Plan Year



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

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
425 San Pedro	25	No	PSH in partnership with SAMMs and SAHT
Commons At Acequia Trails	80	No	PSH in partnership with SAMMs and SAHT
North/South Pond	50	No	MPBV New Construction
Snowden Senior	54		New Construction for Elderly Low income residents
Aspire at Tampico	20		Current Existing property
TOTAL:			
Planned new Project Based Units in Plan Year			

Section II. A. iv. Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	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	Affordable Housing 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	Affordable Housing Community - supports Family Homeless Referral Program (FY15-3 Activity)
Total:	183			
Planned Existing Project-Based Vouchers				

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

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

The organization has applied for 74 tenant protection vouchers and is pending HUD approval.

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 Affordable Housing Communities 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

As a block grant organization, Opportunity Home combines PH, HCV and Capital Fund Program (CFP) funds into a single fund with full funding flexibility. 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 ongoing physical needs assessments.

Property	Budget (\$)	Description
PHA Wide	1,000,000	Intrusion Protection/Security Cameras
PHA Wide	3,400,000	PH Operating Shortfall
PHA Wide	1,700,000	Program Administration
Blanco	900,000	Housing Hazards above Grant
Cassiano	150,000	Foundation Repairs
College Park	200,000	A/C Upgrades
Escondida	150,000	Elevator Modernization
Fair Avenue	1,000,000	Elevator / Water Softener / Boiler
Kenwood North	150,000	Elevator Modernization
Matt Garcia	950,000	Housing Hazards above Grant
Riverside	6,000,000	PNA Substantial Renovation
Tarry Towne	1,000,000	Burn Restoration
Villa Hermosa	200,000	Boiler / HVAC Renovation
Westway	200,000	Security Gates / Lighting / Parking Lot
Total	17,000,000	

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	129,600	11,100



PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLD TO BE SERVED**
Local, Non-Traditional: Tenant-Based^	NA	NA
Local, Non-Traditional: Property-Based^	28,800	2,400
Local, Non-Traditional: Homeownership^	NA	NA
Planned Total Households Served:	228,324	19,027

* "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		28,800	2,400
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
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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.
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MTW Housing Choice Voucher The organization has continued to maintain voucher utilization during FY2024, exceeding internal utilization targets and meeting the MTW STS. The organization is not currently holding lease-up fairs, as they are not necessary. Current focus has been placed on non-MTW voucher utilization and partnership discussions remain ongoing on how to better monitor the number of referrals needed to continue moving forward to maintain or increase utilization for those vouchers. To improve landlord communication, AHP created a video resource detailing the requirements to pass a Housing Quality Standards (HQS) inspection. This video was developed to help landlords 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	Community-wide	17,125	Closed	No
Accessible Unit Public Housing	Community-wide; For applicants who require a 504 accessible unit	2,656	Open	N/A
Elderly Mix Public Housing	Community-wide; For applicants who are 62 and above or who have a documented disability (they may be under the age of 62).	6,644	Open	N/A
Family Public Housing	Community-wide; For applicants who do not require 504 accessible units or who do not meet elderly / disabled family definition"	46,050	Open	N/A
La Posada MOD Rehab Site-based		8,815	Currently closed as of 8/13/23	N/A



Prospect Hill MOD Rehab	Site-based	459	Currently closed as of 8/13/23	N/A
East Meadows Project-Based Vouchers	Site-based	2,732	Closed as of 6/21/21	N/A
Gardens at San Juan Project-Based Vouchers	Site-based	5,676	Closed as of 6/21/21	N/A
Wheatley Park Senior Project-Based Voucher	Site-based	195	Closed as of 8/13/23	N/A
PBV Preferred Affordable Housing Communities	Site-based	0	Open (Referrals Only)	N/A
Local Non-Traditional Property-Based	Site-based	0	Closed (Referrals Only)	Yes
Stability Voucher	Community-wide	0	Open (Referrals Only)	N/A
Housing Choice Voucher	Community-wide	17,125	Closed	No
Accessible Unit Public Housing	Community-wide; For applicants who require a 504 accessible unit	2,656	Open	N/A
Elderly Mix Public Housing	Community-wide; For applicants who are 62 and above or who have a documented disability (they may be under the age of 62).	6,644	Open	N/A

Please describe any duplication of applicants across waiting lists:

Waitlist figures are reported as of February 1, 2025. There are a total of 64,757 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
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Section 8 Tenant Voucher	Opportunity Home does not anticipate re-opening the waitlist during the plan year.
Accessible Unit Public Housing	None
Elderly Mix Public Housing	None
Family Public Housing	Anticipated to be closed in 2025
La Posada MOD Rehab	Currently closed, do not anticipate opening this waitlist
Prospect Hill MOD Rehab	Currently closed, do not anticipate opening this waitlist
East Meadows Project Based Vouchers	Currently closed, do not anticipate opening this waitlist
Gardens at San Juan Project Based Vouchers	
Wheatley Park Senior Project Based Voucher	
PBV Preferred Affordable Housing Communities	None
Local Non-Traditional Property-Based	The organization's Affordable Housing Communities portfolio maintains waitlists at each property. No changes anticipated.
Section 8 Tenant Voucher	Opportunity Home does not anticipate re-opening the waitlist during the plan year.



Section III | Proposed MTW Activities

FY2025-1: Early Engagement

A. ACTIVITY DESCRIPTION

i. This activity was initially approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. This activity requires in-person participation and was closed due to the continued, modified operations caused by COVID-19. As Opportunity Home San Antonio returned to standard operations, it became evident that this activity should be revisited and adjusted. The program of the activity will remain the same, but the objective has been modified.

The activity establishes a requirement that applicants complete a defined set of courses upon admission to PH or HCV. The classes are designed to introduce incoming households to critical topics such as tenants' rights, housekeeping, safety and security, financial literacy, and access to a resource fair with community service providers. The curriculum is the product of formal partnerships with other agencies who participate as instructors or advisors in the design and implementation of the courses. The courses are designed to provide incoming households with the information to become successful residents while establishing clear expectations and starting their housing tenure with stability in mind.

The resource fair is particularly an important component of the day as it will always include case managers for the Family Self-Sufficiency (FSS) and Resident Opportunity Self-Sufficiency (ROSS) programs and has often included partners promoting information on education, employment, and Section 3 opportunities.

Only one member of the household (head or co-head) is required to participate and those who successfully complete the courses will receive a certificate.

Elderly and disabled heads of households are exempt from the requirement but encouraged to take the courses.

ii. The Early Engagement will promote self-sufficiency by connecting new residents to Opportunity Home programs and partners. FSS staff will recruit for their program on-site, and also conduct follow-ups for households that express



interest in the program. All families will complete an assessment that may disclose other needs that can be addressed by ROSS case management.

Case management and supportive services can help families develop goals and achieve self-sufficiency from the start of their housing journey.

iii. This activity is hosted monthly. Coordinating with Public Housing and Housing Choice Voucher staff, session trainers, and resource partners will take some time. It is anticipated that this activity will commence in the second quarter of the Fiscal Year.

iv. No special-purpose vouchers will be used.

B. COST IMPLICATIONS

i. The proposed activity will result in a negative cost implication for Opportunity Home San Antonio.

ii. The estimated yearly cost to host the Early Engagement activity is \$66,000. This bulk of the budget, up to 50%, will secure a venue large enough to host up to 400 people monthly. In previous demonstration years, there were three months with a second Early Engagement hosted as more than 400 tenants had been eligible for housing in those months. The venue layout must allow for one central gathering area that becomes the resource fair after the program starts, and then four additional rooms are needed for breakout sessions. Other considerations for the venue include accessibility, ample parking, and sufficient facilities for the number of attendees. The other expenditures include 15% for translation services that include Spanish and hearing impaired, 12% for supplies that include items such as signage, mail and postage, handouts, folders, pens, wristbands and any other day of items, 10% for water and essential snacks for participants, 8% for facilities support to include security, cleaning, audio/visual, and insurance, the remaining 5% is a reserve amount in the event an additional Early Engagement program is needed.

Opportunity Home San Antonio will focus on a multifaceted strategy to manage the anticipated deficit. This includes a rigorous prioritization of expenses for



each event, coupled with a proactive approach to procurement, ensuring that negotiated rates are leveraged whenever possible.

Furthermore, the organization intends to draw upon its established network of partners to secure in-kind donations and event contributions, a strategy that has proven successful in offsetting program costs in previous years. This collaborative approach not only helps to mitigate the financial deficit but also strengthens community ties and reinforces the organization's commitment to collaborative solutions.

C. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

- i. Authorizations: MTW Agreement Attachment C, Section C(2) (Local Preferences and Admission and Continued Occupancy Policies and Procedures) and Section D(4) (Waiting List Policies).
- ii. The authorization is requested as participation in the Early Engagement will be criteria for admission to public housing and the housing choice voucher program for non-elderly, non-disabled households.

Section IV | Approved MTW Activities

A. Implemented Activities

FY2011-1e | Preservation and Expansion of Affordable Housing

Plan Year Approved, Implemented, Amended

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

Description/Update

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The 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). The activity's implementation will be in accordance with the requirements for HUD PIH Notice 2011-45.

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

As a result of these investments, the organization anticipates preserving a total of 1,454 units which includes 158 of public housing / project-based voucher units, 1,276 affordable units (under 80% AMI) that will be MTW local non-traditional eligible units, and 12 market units.

Project Name	District	Type of Tax Credit	Proposed Action	Total Units	PH/ PBV	Local Non-Traditional Eligible Units						Market
						30%	40%	50%	60%	70%	80%	
Alhambra	D4	9% Tax Credits	Refinance / Acquisition 2024	140	14	0	0	0	120	0	0	6
San Juan Square I	D5	9% Tax Credit	Refinance / Acquisition 2024	143	46	0	0	0	91	0	0	6
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 Credits & Bonds	Refinance / Acquisition 2024	228	0	0	0	0	228	0	0	0
Refinance / Acquisition 2024 Total				763	60	0	0	0	691	0	0	12
Hemisview Village	D1	4% Tax Credits & Bonds	Refinance / Acquisition 2025	245	49	0	0	12	184	0	0	0
Artisan at Creekside	D5	4% Tax Credits & Bonds	Refinance / Acquisition 2024	252	0	0	0	0	252	0	0	0
Sutton Oaks I	D2	9% Tax Credit	Refinance / Acquisition 2025	194	49	0	0	28	109	0	0	8
Refinance / Acquisition 2025 Total				691	98	0	0	40	545	0	0	8
Grand Total				1,454	158	0	0	40	1,236	0	0	20



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	None
Percentage of households served that continue to be housed after 1 years	0	90%	Average Tenure	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	0	43	None	None



"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.

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.
 - Affordable Housing Communities or Partnerships: Up to fifty (50) modified PBVs at one of Opportunity Home's Affordable Housing Communities 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.
 - Affordable Housing Communities: Up to thirty (30) modified PBVs at a new Opportunity Home - Affordable Housing Communities 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.
- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Organization’s Affordable Housing 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. In addition, the organization may cap housing subsidies to not exceed the current HUD funding amount per voucher.

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
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Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.

0 0 None None

Median Household Income

Unit of Measurement	Baseline	Benchmark	Changes to Metrics	Changes to Data Collection
Median income of households living in local project based set-aside voucher units, by income bracket	AMI upper limit of households living in units	Targeted AMI upper limit of households living in units	None	None
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 2025 Payment Standards were set at 84% to 98% of SAFMRs to be effective for new admissions January 1, 2025 or later and recertifications effective April 1, 2025 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: \$601	None	None
	Group 1 - EO: \$609	Group 1 - EO: \$609		
	Group 2: \$608	Group 2: \$608		
	Group 2 - EO: \$591	Group 2 - EO: \$591		
	Group 3: \$614	Group 3: \$614		
	Group 4: \$620	Group 4: \$620		
	Group 5: \$690	Group 5: \$690		
	Group 6: \$603	Group 6: \$603		
	Group 7: \$707	Group 7: \$707		
	Group 8: \$847	Group 8: \$847		
Group 9: \$755	Group 9: \$755			
Group 10: \$876	Group 10: \$876			

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 1: 8%	None	None
	Group 2: 8%	Group 2: 8%		
	Group 3: 10%	Group 3: 10%		
	Group 4: 3%	Group 4: 3%		
	Group 5: 2%	Group 5: 2%		
	Group 6: 3%	Group 6: 3%		
	Group 7: 2%	Group 7: 2%		
	Group 8: 0%	Group 8: 0%		
	Group 9: 1%	Group 9: 1%		
	Group 10: 1%	Group 10: 1%		

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.

(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)

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.

HUD has delayed the implementation date for the HOTMA asset provisions and the updated verification hierarchy. Therefore, planned changes did NOT take effect on January 1, 2025, as originally planned. Once HUD releases a new implementation date, the policy will be updated, and the MTW activity will no longer be needed since HOTMA rules allow for self-certification of net assets of up to \$50,000.

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 task as a percentage (decrease).	HCV: 16% PH: 45%	HCV: 16% PH: 40%	None	None

Planned Significant Changes

None.

FY2020-1 | College & University Homeless Assistance Program

(formerly Palo Alto College, College Homeless Assistance Program)

Plan Year Approved, Implemented, Amended



This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY 2019-2020 MTW Plan and implemented in the same fiscal year.

Description/Update

Update: This activity is 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 will implement university transfer allowances and hardship provisions for up to one year after research indicated that students on this program were not immediately self-sufficient upon graduation and required additional time to achieve self-sufficiency.

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 aimed to increase self	0	100	Benchmark updated to reflect new set-asidesNone	Metrics will no longer be tracked by specific college



sufficiency (increase).

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 homelessness¹. It will offer housing options and

¹ Youth may currently be in extended foster care.



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

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

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

Activity Overview

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

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 housing choice (increase).	0	Estimated 1,500 served monthly or 18,000 served annually for food assistance (this may include one household being served multiple months)	Will be adding partnerships including: San Antonio Food Bank City of San Antonio Meals on Wheels Family Service Association (FSA)	None

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

Update

Redevelopment of Lincoln Courts

This activity has not been implemented yet. The first property which will utilize this activity will be the currently under construction Affordable Housing Communities 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
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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
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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

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

- i. This activity was originally approved as part of the FY2014-2015 MTW Plan and implemented November 1, 2014. The activity established a 4-to-1 elderly admissions preference at specific communities in order to increase housing choices for elderly households. The goal of the activity was 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. Due to the low number of elderly applicants, achieving target leasing ratios and maintaining occupancy has become a concern. The activity has been placed on hold to be closed out in the MTW 2024 Report.
- ii. The Organization will move this activity to the “Closed out Activities” in the next Annual MTW Report.
- iii. No significant changes have occurred to the activity since its implementation.



FY2021-2 | Limiting increases in rent

- i. This activity was approved in the FY2020-2021 MTW Plan and was designed to increase housing choice for low-income families who may be experiencing loss of income or other economic hardship. It was intended to be implemented in February of 2021.

- ii. The Organization will move this activity to the “Closed out Activities” in the next Annual MTW Report.

- iii. 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.



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

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	13,424,293
70600	HUD PHA Operating Grants	175,987,365
70610	Capital Grants	11,463,677
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	0
71100+72000	Interest Income	887,588
71600	Gain or Loss on Sale of Capital Assets	-805,885
71200+71300+71310+71400+71500	Other Income	1,755,510
70000	Total Revenue	\$202,712,548

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 expending 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	22,384,843
91300+91310+92000	Management Fee Expense	9,706,463
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	3,251,206
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	6,011,791
93500+93700	Labor	0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	27,794,550



FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	22,384,843
91300+91310+92000	Management Fee Expense	9,706,463
91810	Allocated Overhead	0
92500 (92100+92200+92300+92400)	Total Tenant Services	3,251,206
95000 (95100+95200+95300+95500)	Total Protective Services	1,893,704
96100 (96110+96120+96130+96140)	Total Insurance Premiums	2,488,718
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	5,189,861
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	306,250
97100+97200	Total Extraordinary Maintenance	0
97300+97350	HAP + HAP Portability-In	112,704,036
97400	Depreciation Expense	8,044,926
97500+97600+97700+97800	All Other Expense	0
90000	Total Expenses	\$199,776,348

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

Estimated total revenues are greater than estimated total expenses. FDS line item 97400, Depreciation Expense 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. If the net of these two items create an operating loss it would be covered with MTW HUD-held funds. In the event that actual revenues exceed actual expenses, if the excess revenues are attributable to Housing Assistance Payments, the funds would increase MTW HUD-held funds. If the excess revenues are attributed to Admin fees, Opportunity Home would retain the excess funds.

Section V. A. iii. | Description of Planned Application of MTW Funding Flexibility

MTW agencies have the flexibility to apply fungibility across three core funding programs’ funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW



authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

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

Community Development Initiative Department:

The Organization uses MTW funds to support the Community Development Initiatives Department. 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 Services

- Resident Outreach
- Service Coordination
- Administration of HUD-Funded Programs
 - Family Self Sufficiency Program
 - Resident Opportunities and Self-Sufficiency (ROSS) Grant Program
 - Elderly & Disabled Services (EDS) Program
 - Jobs Plus at Lincoln Heights Grant Program
- Choice Endowment Trust
- ConnectHomeSA Digital Inclusion Program
- Opportunity Home Grant Management
- 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's 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.
- Community Coach: MTW funds also support the Community Coach 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.

In addition to the uses 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 3/31/2024	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	(\$6.4 million)	(\$6.4 million)
HUD-Held HCV Funds	\$60 million	\$60 million
TOTAL:	\$54 million	\$54 million

Description

Per Board Resolution 6520 dated June 12, 2024, Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

Sources:

- MTW Funds- \$54 million

Uses:

- Section 8 funding shortfall - \$1 million
- Public Housing operating shortfall - \$11.3 million
- Community Development Initiatives or CDI - \$2.5 million
 - See Section V. A. iii. | Description of Planned Application of MTW Funding Flexibility above for more details on services provided
- Central Office operating shortfall - \$1 million



- Alazan Phase I and Predevelopment Costs - \$18 million
- Investment in Midcrowne and Ravello Properties - \$5 million
- Investment in MTW units at Tax Credit/Affordable Housing Communities Properties - \$10.7 million
- Additional Investment in the 100 Labor Street Project - \$1.5 million
- Additional Costs Related to Public Housing Rent Collection Efforts - \$3 million

Total MTW funds obligated is \$54 million.

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

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

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

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

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OPPORTUNITY HOME SAN ANTONIO

May 1, 2024

BOARD OF COMMISSIONERS Regular Board Meeting

RESOLUTION 6514, AUTHORIZING THE PROPOSED 2024-2025 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

DocuSigned by:
Ed Hinojosa Jr
Ed Hinojosa, Jr.
President and CEO

DocuSigned by:
Richard Milk
Richard Milk
Planning Officer

REQUESTED ACTION:

Consideration and approval regarding Resolution 6514, authorizing the proposed 2024-2025 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), the five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action plan.

SUMMARY:

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

Opportunity Home is on track to complete the 2024-2025 Agency Plan in time for submission to HUD on May 10, 2024.

Proposed Changes to MTW Housing Stock, Leasing, and Waiting Lists

- MTW baseline is expected to increase from 18,170 to 18,244.
 - No changes are proposed for Public Housing
 - 74 tenant-based vouchers currently under review by HUD are anticipated to be added to the voucher baseline
 - Commitment of existing voucher resources to support 125 project-based vouchers for permanent supportive housing and other projects
- Public Housing occupancy is expected to continue with minimal changes.
- Voucher leasing utilization is expected to continue until meeting the budgeted planned vouchers, 10,800.
- Leasing for local non-traditional units is expected to increase in the coming fiscal year due to an additional four properties.



OPPORTUNITY HOME SAN ANTONIO**May 1, 2024**

- There are over 100,000 households on any of the organization's waitlists -- Demand is expected to remain high in 2025.
- The Organization plans to transition away from site-based project-based voucher waitlists and conduct additional waitlist maintenance in the coming fiscal year.
- Public Housing waitlists are the only waitlists that are planned to be open.

Proposed new activities

- Opportunity Home is not proposing any new strategies using regulatory waivers.

Proposed changes to existing activities

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

Revisions to the Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Administrative Plan (Admin Plan)

- The U.S. Department of Housing and Urban Development (HUD) recently published the final rule of the Housing Opportunity Through Modernization Act of 2016 (HOTMA), prompting significant changes to various HUD programs, including Public Housing and Housing Choice Voucher (HCV), also known as Section 8. As a result of HOTMA, many policies and procedures within Opportunity Home's Public Housing and HCV programs are being updated to comply with the new regulations. HOTMA updates will be effective January 1, 2025 for Opportunity Home.
- The proposed revisions to the Admissions and Continued Occupancy Policy (ACOP) and Administrative Plan are aimed at accomplishing the following objectives:
 - Accurately reflect federal regulations, state regulations, and local law
 - Improve problematic policies
 - Eliminate redundancies and contradictions
 - Reduce unnecessary resource expenditures
 - Accommodate the needs of residents across Opportunity Home's multiple Public Housing communities and Housing Choice Voucher program
- Proposed changes
 - Discrimination Complaints: Sections 2.1.C Discrimination Complaints, 2.1.D Complaints under the Equal Access Final Rule, and 2.1.E VAWA Complaint Processing were updated to align with the HUD Respondent Obligations in Fair Housing Investigations Interactive Diagram, Equal Access Final Rule [Notice PIH 2014-20] and Notice FHEO 2023-01.
 - Family Consent to Release of Information (HUD-9886-A): Sections 3.2.D and 7.1.A were updated to include 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 SAN ANTONIO**May 1, 2024**

Opportunity Home. Opportunity Home has opted to deny admission/terminate tenancy for applicants and residents who revoke or fail to consent to release financial information.

- Use of Other Programs' Income Determinations: Section 7.1.B was updated to include new HOTMA requirements regarding Safe Harbor determinations. The new section provides information on the allowed means-tested federal public assistance programs Opportunity Home can accept. Opportunity Home has opted out of using income determinations from other programs in the public housing program. The Assisted Housing Programs will use other programs' income determinations when available.
- 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. Public Housing has opted to review income EIV and IVT reports at annual reexamination for all residents. The Assisted Housing Program has opted to review income EIV and IVT reports, except in cases where Safe Harbor verification from another means-tested federal assistance program is used.
- EIV + Self-Certification: Section 7.1.F includes language allowing Opportunity Home to accept EIV and a family's self-certification as employment income verification, provided the family agrees with the amounts listed in EIV.
- Self-Certification of Net Family Assets: Sections 7.3.F of the ACOP and 7.3.E of the Admin Plan add 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.
- 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 income.
- Third-Party Verification of Social Security Numbers: Sections 7.2.B of the ACOP and 17.2.A of the Admin Plan is updated to include language that allows Opportunity Home to accept third-party documents and self-certification of an applicant or participant's Social Security Number (SSN) when all other attempts to obtain that information have been unsuccessful.
- Other Permitted Reasons for Denial of Admission: Section 3.3.D was updated to allow Opportunity Home to deny admission to Public Housing or HCV when applicant families have been terminated from federally assisted housing in the last three years.

Revisions to the Family Self-Sufficiency (FSS) Program Action Plan

- Opportunity Home is not proposing any changes.

Asset Management Plans**Preservation**

- **Public Housing:** Over the next five years, the Organization plans to invest approximately \$71 million in capital repairs to extend the useful life of 24 properties and approximately 3,904 housing units.
- **Beacon:** In the coming years, the Organization plans to invest approximately \$22



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OPPORTUNITY HOME SAN ANTONIO

May 1, 2024

million in capital repairs to extend the useful life of 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 transition ownership to Opportunity Home. As a result of these property transitions, the capital plan is expected to change to include these new properties.

Expansion

- The organization has constructed 1,260 new units awaiting permanent financing – 76% are affordable at 80% AMI or below.
- An additional 1,037 units are in the construction pipeline and expected to be completed – 83% are affordable at 80% AMI or below.

MTW TIMELINE

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

STRATEGIC OUTCOMES:

Supports all strategic outcomes.

ATTACHMENTS:

Resolution 6514
MTW Plan
Slide Deck



**Opportunity Home San Antonio
Resolution 6514**

RESOLUTION 6514, AUTHORIZING THE PROPOSED 2024-2025 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio, a public instrumentality created pursuant to the laws of the State of Texas must approve the 2024-2025 Moving to Work (MTW) Agency Plan for fiscal year 2024-2025, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program (CFP), and the Family Self-Sufficiency (FSS) Program Action plan; and

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio also desires to authorize the submission of the 2024-2025 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

WHEREAS, the Board further desires to authorize the Chairman and the President and CEO to execute and submit to HUD such certifications and other documents that they deem necessary or advisable in connection with the submission of the MTW Agency Plan.

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of Opportunity Home San Antonio hereby:

- 1) Approves Resolution 6514, authorizing the proposed 2024-2025 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), the five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action plan; and
- 2) Authorizes the Board Chair and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2024-2025 MTW Plan to HUD.

Passed and approved this 1st day of May 2024.

DocuSigned by:


Gabriel Lopez
 Chair, Board of Commissioners



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Attested and approved as to form:

DocuSigned by:

Ed Hinojosa Jr

01DABF73613284FA

Ed Hinojosa, Jr.

President and CEO



CERTIFICATIONS OF COMPLIANCE
<p>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p>Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan</p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2024), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:</p>
<ol style="list-style-type: none"> (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment. (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan. (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD). (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located. (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan. (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI), Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91. (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146. <ul style="list-style-type: none"> iv In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status. (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75. (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

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



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

- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Coast Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Opportunity Home San Antonio

TX006

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Ed Hinojosa, Jr.

President and CEO

NAME OF AUTHORIZED OFFICIAL

TITLE

DocuSigned by:

Ed Hinojosa Jr

5/6/2024

SIGNATURE

DATE

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

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



Section VI. B. | Documentation of Public Process

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

A 30-day public comment period began on Thursday, Feb. 27, 2025, and ended on Friday, March 28, 2025, on the Opportunity Home San Antonio's Proposed 2025 - 2026 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.

A Public Hearing of the Board of Commissioners was held at Opportunity Home, 818 S. Flores St., San Antonio, TX, 78204 prior to 2:00 p.m., commencing on March 18, 2024. There were X attendees and X public comments.

See Appendix A for more information.





JOIN MEETING
818 S. Flores St.
San Antonio, TX 78204

BOARD OF COMMISSIONERS

- | | | | | | | |
|------------------------|--------------------------------|---|---------------------------------|--|------------------------------|-------------------------------|
| Gabriel Lopez
Chair | Gilbert Casillas
Vice Chair | Barbara Ankamah Burford
Commissioner | Dalia Contreras
Commissioner | Estrellita Garcia-Diaz
Commissioner | Janel Garcia
Commissioner | Lellah Powell
Commissioner |
|------------------------|--------------------------------|---|---------------------------------|--|------------------------------|-------------------------------|

ACTING PRESIDENT & CEO
Michael Reyes

OPPORTUNITY HOME SAN ANTONIO | PUBLIC HEARING
1:00 p.m. | Tuesday | March 18, 2025

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

VIRTUAL

YouTube:
<https://www.youtube.com/@sahaorg/streams>

IN-PERSON

Mirasol Homes
4222 El Paso St.
San Antonio, TX 78237

PROPOSED 2025-2026 MOVING TO WORK AGENCY PLAN

1. Introduction and Background (Aiyana Longoria, Chief Strategy, Data and Innovation Officer)
2. Proposed 2025-2026 Moving to Work Agency Plan (Aiyana Longoria, Chief Strategy, Data and Innovation Officer)
 - Moving to Work Plan
 - Public Housing Admissions and Continued Occupancy Plan
 - Housing Choice Voucher Administrative Plan
 - Capital Fund Program Plan
 - Family Self-Sufficiency (FSS) Program Action Plan

3. Public Comments/Feedback

A 30-day public comment period began on Thursday, February 27, 2025, and ends on Friday, March 28, 2025, on the Opportunity Home San Antonio's Proposed 2025 - 2026 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 28, 2025.

4. Summary and Next Steps (Aiyana Longoria, Chief Strategy, Data and Innovation Officer)

Posted on: 02/27/2025 12:00 PM

*Note: Whenever the Texas Open Meetings Act (Section 551.001 et seq. of the Texas Government Code) provides for a closed meeting in matters concerning legal advice, real estate, contracts, personnel matters, or security issues, the Board may find a closed meeting to be necessary. For convenience of the citizens interested in an item preceded by an asterisk, notice is given that a closed meeting is contemplated. However, the Board reserves the right to go into a closed meeting on any other item, whether it has an asterisk, when the Board determines there is a need and a closed meeting is permitted. These committee meetings may become special board meetings if a quorum of the Board attends. No final action is contemplated at these meetings.



Section VI. C. | Planned And Ongoing Evaluations

A. RESIDENT IMPACT ANALYSIS DURING PLANNING PHASE

Opportunity Home will incorporate an impact analysis framework in the MTW activities design process. The additional steps and questions, as outlined below, have been sourced from internal conversations as well as toolkits developed by organizations leading impact analysis work. During the planning and evaluation process, these steps and questions will be used as a guiding framework.

Activity Description

- Identifying Stakeholders
 - Which groups may be most affected by and concerned with the issues related to this proposal?
- Engaging Stakeholders
 - How can we keep stakeholders from all backgrounds—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?
- Clarifying the purpose
 - What does the proposed activity seek to accomplish?
 - What is the desired outcome the activity wants to achieve?
 - Will the activity reduce inefficiencies?
- Considering Adverse Impacts
 - What adverse impacts or unintended impacts could result from this activity?
 - How could adverse impacts be prevented or minimized?

Communication & Resident Feedback Loops

- How will Opportunity Home share information, opportunities, and data with those most impacted?
- How will Opportunity Home ensure messaging reaches all residents within our communities?

B. EVALUATION FRAMEWORK

The evaluation framework will closely follow the standard program evaluation framework. This framework, as described by the Center for Disease Control, has 6 critical steps²:

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.

² <https://www.cdc.gov/mmwr/PDF/rr/rr4811.pdf>



Questions to consider:

- Who are the stakeholders?
- Will 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?
- 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 negative results?
- To what extent are decision points resulting in negative results?
- To what extent do all individuals have access to processes, policies or programs intended for them?
- How can the activity be redesigned to improve efficiency and effectiveness?

Possible evaluation uses include:

- Demonstrate an activity's impact
- Improve activity to result in positive 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 negative results?
- Are the decision points resulting in negative results?
- What strategies can be implemented to address these issues?
- Are changes to decision points needed to address problems?
- How did the issues arise? Are they expanding or narrowing?
- Did the proposed activity address root causes?
- Did the proposed activity accomplish its purpose?
- What adverse impacts or unintended impacts, if any, resulted from this activity?
- 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 positive outcomes.

- How will Opportunity Home share findings and recommendations back to key stakeholders?

C. Planned Evaluations

During the upcoming fiscal year, the organization plans to conduct evaluations of specific activities. Selection of activities scheduled to be evaluated during FY2026 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

Updated Lobbying Disclosure forms will be available soon.



Appendix | Additional Items

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

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

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

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

[Appendix E | Asset Management Plan](#)

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

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



Appendix A | Public Comments Summary Report

MTW Timeline

Date	Description	Outreach	Attendees
X	X	X	X

Materials posted

- Public hearing and public comment period notice
- Draft FY2025 MTW Plan
- MTW Plan Update Summary
- ACOP / Admin Plan / Lease Revision summaries
- Video recording and presentation - to be posted
- Public comment feedback document - to be posted

Feedback Overview

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

Section	Feedback Overview	Adjustments to Plan





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

Indicates policy has been added

~~Indicates policy has been removed~~

Reasonable Accommodations Responses

Reason for Change to 2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

This section update may impact current residents and applicants. The language in section 2.2.E(3) has been revised to allow the 504 Coordinator to respond to participants within 30 calendar days after they submit a Reasonable Accommodation request instead of the previous 10 business days. This policy update puts residents first by allowing additional time to provide missing or incomplete documentation to fulfill reasonable accommodation requirements.

2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

- (1) Opportunity Home must approve a request for an accommodation if the following three conditions are met:
 - (a) The request was made by or on behalf of a person with a disability.
 - (b) There is a disability-related need for the accommodation.
 - (c) The requested accommodation is reasonable, meaning it would not impose:

- (3) After a request for an accommodation is presented, Opportunity Home will respond in writing within ~~10 business days~~ 30 calendar days.



Informal Hearing Responses

Reason for the Addition of 14.3.H(b) Informal Hearings for Participants [24 CFR 982.555]

The change to section 14.3.H(b) may affect current residents. The updated language allows the Informal Hearing Officer to provide a written decision to the family no later than 15 business days after the informal hearing takes place. This is an extension of 5 business days beyond the previous policy, which required a decision within 10 business days. The 15 business-day policy would align with other public housing agencies and is the recommended standard by housing organizations.

14.3.H Decision of the Hearing Officer [24 CFR 966.57]

- (1) The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the complainant and Opportunity Home. Opportunity Home must retain a copy of the decision in the tenant's folder. A log of all hearing officer decisions must also be maintained by Opportunity Home and made available for inspection by a prospective complainant, their representative, or the hearing officer [24 CFR 966.57(a)].

- (b) The hearing officer will issue a written decision to the family and Opportunity Home no later than 15 business days ~~10 business days~~ after the hearing. The report will contain the following information:

Local Residency Preference

Reason for the Change to 4.3.B Selection Method

This change may affect applicants. Section 4.3.B(2)(g) now includes language to establish a local residency preference for the San Antonio area. The local residency preference would allow Opportunity Home to prioritize the housing needs of local San Antonio residents.

4.3.B Selection Method



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

- (a) Opportunity Home is permitted to establish local preferences, and to give priority to serving families that meet those criteria.
- (b) HUD specifically authorizes and places restrictions on certain types of local preferences.
- (c) HUD also permits Opportunity Home to establish other local preferences, at its discretion.
- (d) Any local preferences established must be consistent with Opportunity Home’s plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

(e) Opportunity Home’s selection method will be based on local preference with assigned points and date and time of the submitted application.

(g) **Waiting List Preferences**

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

(vi) **San Antonio Residency Preference (25 Points) – Families must reside in, work in, or be hired to work in San Antonio and/or surrounding municipalities.**

Early Engagement Program

Reason for the Addition of Section 4.3.E Early Engagement Program

The new section 4.3.E may impact program applicants. The new section includes the policy for the Early Engagement Program, which will require applicants selected from the waitlist to attend an Opportunity Home-sponsored briefing before or after determining eligibility for participation.

4.3.E Early Engagement Program

All applicants selected from the waiting list, with the exception of elderly and



disabled applicants must attend an Opportunity Home-sponsored Early Engagement Program (EEP) briefing before or after they are determined eligible for participation. Generally, applicants are required to attend the EEP briefing prior to leasing. However, Opportunity Home may waive this requirement and permit leasing to an applicant before they have attended the EEP briefing, if doing so would remove a barrier for the family in quickly securing and/or leasing a suitable unit. Failure to attend a required EEP briefing may be cause for denial.

Removal From the Waitlist - EEP

Reason for the Change to 4.2.F(3) Removal from the Waiting List

This change may affect applicants. Section 4.2.F(3)(e) has been updated to state that applicants who fail to attend a required EEP briefing may be removed from the waitlist.

(3) Removal from the Waiting List

(e) Under any of the following conditions, applicants will be removed from the waiting list for all preferred developments:

(ix) The applicant failed to respond and attend an Early Engagement session as required for admittance into the Public Housing program;

Determining Bedroom Size

Reason for the Change to 5.1.B Determining Unit Size

This change may affect applicants and residents. Section 5.1.B(2)(a) has been updated to clarify that Opportunity Home may allow a living room to be used as a sleeping (bedroom) space, but no more than two persons may occupy the space.

5.1.B Determining Unit Size

- (1) In selecting a family to occupy a particular unit, Opportunity Home may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].



- (2) HUD does not specify the number of persons who may live in public housing units of various sizes. Opportunity Home is permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

- (a) Opportunity Home will use the same occupancy standards for each of its developments.

- (ii) Persons of different generations will not be required to share a bedroom.
- (iii) Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.
- (iv) Single person families will be allocated a zero or one bedroom.
- (v) A living room may be used as a sleeping (bedroom) space, but no more than two persons may occupy the space.

Number of Unit Offers for Applicants

Reason for the Change to 5.2.B Number of Offers

This change may affect applicants. Section 5.2.B(1) has been updated to allow Opportunity Home to extend up to two unit offers to applicants rather than only one.

5.2.B Number of Offers

- (1) Opportunity Home has adopted the following unit offer plan:

One (1) Up to Two Unit Offers:

- (a) The applicant will be offered a suitable unit at their preferred development.
- (b) The applicant will be given a maximum of two unit offers. Exceptions may be made only in cases where the applicant has demonstrated good cause for unit refusal, as outlined in section 5.2.D.



Appendix C | Summary of Revisions to the Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Reasonable Accommodations Responses

Reason for Change to 2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

This section update may impact current program participants and applicants. The language has been revised to allow the 504 Coordinator to respond to participants within 30 calendar days after they submit a Reasonable Accommodation request instead of the previous 10 business days. This policy update puts residents first by allowing additional time to provide missing or incomplete documentation to fulfill reasonable accommodation requirements.

2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

- (1) Opportunity Home must approve a request for an accommodation if the following three conditions are met:
 - (a) The request was made by or on behalf of a person with a disability.
 - (b) There is a disability-related need for the accommodation.
 - (c) The requested accommodation is reasonable, meaning it would not impose:

- (3) After a request for an accommodation is presented, Opportunity Home will respond in writing within ~~10 business days~~ 30 calendar days.



Informal Hearings for Expired Vouchers

Reason for the Change to 16.4.C Informal Hearings for Participants [24 CFR 982.555]

Changes to section 16.4.C may impact current participants. The updated language removes the requirement that Opportunity Home provides the option for an informal hearing for expired vouchers. Residents sent to terminations for expired vouchers will not have the option to request an informal hearing review, allowing staff to focus on informal hearings for required circumstances.

16.4.C Informal Hearings for Participants [24 CFR 982.555]

- (b) Circumstances for which an informal hearing is not required are as follows:
 - (i) Discretionary administrative determinations by Opportunity Home
 - (ii) General policy issues or class grievances
 - (iii) Establishment of Opportunity Home’s schedule of utility allowances for families in the program
 - (iv) An Opportunity Home determination not to approve an extension or suspension of a voucher term
 - (v) An Opportunity Home determination not to approve a unit or tenancy
 - (vi) An Opportunity Home determination that a unit selected by the applicant is not in compliance with the HQS
 - (vii) An Opportunity Home determination that the unit is not in accordance with HQS because of family size
 - (viii) A determination by Opportunity Home to exercise or not to exercise any right or remedy against an owner under a HAP contract

- (c) Opportunity Home will only offer participants the opportunity for an informal hearing when required by regulations. :
 - ~~(i) required by regulations, or~~
 - ~~(ii) Opportunity Home makes a determination to terminate a family’s housing assistance due to an expired voucher/lease.~~



Informal Hearing Responses

Reason for the Addition of 16.4.C Informal Hearings for Participants [24 CFR 982.555]

The change to section 16.4.C(6)(i)(v) may affect current program participants. The updated language allows the Informal Hearing Officer to provide a written decision to the family no later than 15 business days after the informal hearing takes place. This is an extension of 5 business days beyond the previous policy, which required a decision within 10 business days. The 15 business-day policy would align with other public housing agencies and is the recommended standard by housing organizations.

16.4.C Informal Hearings for Participants [24 CFR 982.555]

(i) *Hearing Officer's Decision [24 CFR 982.555(e)(6)]*

- (i) The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision.
- (ii) Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing.
- (iii) A copy of the hearing decision must be furnished promptly to the family.

- (v) The hearing officer will issue a written decision to the family and Opportunity Home no later than 15 business days ~~10-business days~~ after the hearing. The report will contain the following information:

Exception Overlay

Reason for the Change to 9.1.H Changes in Lease or Rent [24 CFR 982.308]

Section 9.1.H has been updated to remove the exception overlay provision of MTW activity FY2019-1 - Local Implementation of SAFMR; updates to the payment standards have made this activity no longer necessary.

9.1.H Changes in Lease or Rent [24 CFR 982.308]



~~(6) **Financial Hardship for Exception Overlay**~~

~~(a) Opportunity Home will cap the increase of a household's tenant portion at 10 percent if the following apply:~~

- ~~(i) The household is currently under contract for a unit located in the exception overlay;~~
- ~~(ii) The landlord requests for an increase in rent after the first contract year and the rent is determined to be reasonable;~~
- ~~(iii) The household's new tenant portion increases by more than 10 percent from the current tenant portion, and~~
- ~~(iv) The new increase is not a result of a change in household circumstances.~~

~~See Section 6.3.C for Opportunity Home's policy on applying payment standards during requests for rental increase.~~

Family Obligations

Reason for the Change to 5.1.C Family Obligations

The update to section 5.1.C may impact current program participants. The language below has been updated to include that "Guests" of a household must not engage in violent or drug-related criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents.

5.1.C Family Obligations

(w) **Do Not Engage in Criminal Activity Related to Drugs or Violence, or That Is Threatening to Your Neighbors**

The members of the household may not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

- (i) Opportunity Home may terminate a family's assistance if any household member or guest has violated the family's obligation not to engage in any drug-related criminal activity, violent



criminal activity, or other criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

College & University Homeless Assistance Programs

Reason for the Change to 19.2 College & University Homeless Assistance Programs

The update to section 19.2.D of the College & University Homeless Assistance Program policy may affect current program participants. The language has been updated to note that in cases of extended assistance, the assistance must end 6 months after the participant's graduation.

19.2 College & University Homeless Assistance Programs

19.2.D Termination

Opportunity Home may terminate assistance to a program participant who violates program requirements or conditions of occupancy in accordance with Chapter 12 of this Administrative Plan.

Opportunity Home may terminate assistance upon completion of the degree or certificate program.

Opportunity Home will assess if there is a need for continued assistance and will consider a preference for the HCV waitlist. If a need for continued assistance is determined, Opportunity Home will end assistance 6 months after the participant's graduation.

Removal from the Waitlist

Reason for the Change to 4.2.F Updating the Waiting List

The update to Section 4.2.F may affect applicants and current program participants. The updated language would allow Opportunity Home to remove participants currently receiving assistance from the waiting list. Removing participants who already have a voucher from the waitlist would allow Opportunity Home to prioritize applicants waiting for assistance.



4.2.F Updating the Waiting List [24 CFR 982.204 (c)]

(1) HUD requires Opportunity Home to establish policies to use when removing applicant names from the waiting list.

(2) **Purging the Waiting List**

(g) Under any of the following conditions, applicants will be removed from the waiting list:

(i) The family is currently receiving assistance through a Housing Choice Voucher.

(ii) The family is currently receiving assistance through a program that is not time-limited, with the exception of a Project-Based Voucher.

Local Residency Preference

Reason for the Change to 4.3.C Selection Method

This change may affect potential applicants. Section 4.3.C now includes language to establish a local residency preference for the San Antonio area and removes the Local Non-Traditional (LNT) Referral Program preference. The local residency preference would allow Opportunity Home to prioritize the housing needs of local San Antonio residents.

4.3.C Selection Method

- (1) Opportunity Home must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that Opportunity Home will use [982.202(d)].
- (2) **Local Preferences [24 CFR 982.207; HCV p. 4-16]**
 - (a) Opportunity Home is permitted to establish local preferences, and to give priority to serving families that meet those criteria.
 - (b) HUD specifically authorizes and places restrictions on certain types of local preferences.
 - (c) HUD also permits Opportunity Home to establish other local preferences, at its discretion.



- (d) Any local preferences established must be consistent with Opportunity Home’s plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

(f) **Waiting List Preferences**

Opportunity Home’s waiting list preferences are defined below and shall be assigned points as indicated. Opportunity Home will accept applications from preference applicants even when the waiting list may otherwise be closed. Applicants who qualify for a preference will not be required to complete the online registration but will be placed directly on the waiting list in order of total combined preference points.

- ~~(viii) **Local Non-Traditional (LNT) Referral Program (40 Points)** – Residents referred by Opportunity Home or a partner agency will receive a voucher for Local Non-Traditional communities.~~
- (viii) **San Antonio Residency Preference (25 Points)** – Families must reside in, work in, or be hired to work in San Antonio and/or surrounding municipalities.

Reexaminations for Moves

Reason for the Change to 11.1.C Scheduling Annual Reexaminations

The update to Section 11.1.C may affect current program participants. The new language notes that Opportunity Home may use a previous Reexamination or documentation to process a family move.

11.1.C Scheduling Annual Reexaminations

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



- (a) Opportunity Home will begin the annual reexamination process at least 120 days in advance of its scheduled effective date.
- (b) Generally, Opportunity Home will schedule annual reexamination effective dates to coincide with the family’s anniversary date. Anniversary date is defined as 12 months from the effective date of the family’s last annual reexamination or, during a family’s first year in the program, from the effective date of the family’s initial examination (admission).
- (c) If the family moves to a new unit, Opportunity Home will perform a new annual reexamination, unless a reexamination has been conducted within the last 120 days. [Opportunity Home may use a previous reexamination or documents to process the move.](#)
- (d) Opportunity Home also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Moving to Work SEMAP Exemption

Reason for the Change to 16.7.D SEMAP Exemption for Moving to Work Demonstration Sites

Section 16.7.D has been updated to clarify that Opportunity Home, as a Moving to Work (MTW) agency, has elected not to be scored by the U.S. Department of Housing and Urban Developments (HUD) Section Eight Management Assessment Program (SEMAP) rating system. Instead, Opportunity Home may use a variation of the HUD indicators to measure performance.

16.7.D SEMAP Exemption for Moving to Work Demonstration Sites [PIH Notice 2005-33]

- (1) PHAs in the Moving to Work (MTW) demonstration must submit a SEMAP certification form and certify to their performance on all SEMAP indicators unless their MTW Agreement specifically states that they are exempt from reporting on all or selected SEMAP indicators.
- (2) Section II(G) of Opportunity Home’s Amended and Restated MTW Agreement, effective June 25, 2009, states the following:
 - (a) HUD will not score the Agency under HUD’s Public Housing Assessment System (PHAS) or HUD’s Section Eight Management



Assessment Program (SEMAP), or their successor systems, unless the Agency elects to be scored. If the Agency elects to be scored, the agency will continue to be scored for the duration of the demonstration.

- (3) Opportunity Home elects not to be scored by HUD's SEMAP rating system.
- (4) Opportunity Home ~~will~~ may continue to use ~~the HUD's indicators and/or~~ some variation of HUD's indicators to measure Opportunity Home's performance in key areas of the assisted housing programs.

Mainstream Voucher Program

Reason for the Addition of Section 19.6 Mainstream Voucher Program

The new section 19.6 may impact applicants and current program participants. The section includes the regulations and policies for the administration of the Mainstream Voucher Program, including required regulatory changes detailed in Notice PIH 2024-30, which outlines changes regarding voucher terms and extensions.

19.6 Mainstream Voucher Program

19.6.A Program Overview [Notice PIH 2020-01 and Notice PIH 2024-30]

- (1) Mainstream vouchers assist non-elderly persons with disabilities and their families (particularly those transitioning out of institutions or at serious risk of institutionalization) in the form of either project-based or tenant-based voucher assistance.
- (2) The Mainstream voucher program, was originally authorized under the National Affordable Housing Act of 1990. Mainstream vouchers operated separately from the regular HCV program until the passage of the Frank Melville Supportive Housing Investment Act of 2010.
- (3) Funding for Mainstream voucher renewals and administrative fees was first made available in 2012. In 2017 and 2019, incremental vouchers were made available for the first time since the Melville Act (in addition to renewals and administrative fees), and PHAs were invited to apply for a competitive award of Mainstream vouchers under the FY17 and FY19 NOFAs. In 2020, Notice PIH 2020-22 provided an opportunity for any PHA administering an HCV program to apply for Mainstream vouchers



noncompetitively, while Notice PIH 2020-09 authorized an increase in Mainstream voucher units and budget authority for those PHAs already awarded Mainstream vouchers under the FY17 and FY19 NOFAs.

- (4) Funding and reporting for Mainstream vouchers is separate from the HCV program. Funds for Mainstream vouchers may be recaptured and reallocated if Opportunity Home does not comply with all program requirements or fails to maintain a utilization rate of 80 percent for the Mainstream vouchers.
- (5) The Consolidated Appropriations Act, 2024 (Public Law 118-42) authorized HUD to establish waivers and alternative requirements for Mainstream Vouchers related to the administration of waiting lists, local preferences, and the initial term and extensions of tenant-based vouchers. HUD is not permitted to waive requirements related to tenant rights and protections, rent setting, fair housing, nondiscrimination, labor standards, and the environment. Prior to this, Mainstream vouchers followed the same program requirements as standard vouchers.

19.6.B Eligible Population [Notice PIH 2020-01 and Notice PIH 2020-22]

- (1) All Mainstream vouchers must be used to serve non-elderly persons with disabilities and their families, defined as any family that includes a person with disabilities who is at least 18 years old and not yet 62 years old as of the effective date of the initial HAP contract. The eligible disabled household member does not need to be the head of household.
- (2) The definition of person with disabilities for purposes of Mainstream vouchers is the statutory definition under section 3(b)(3)(E) of the 1937 Act, which is the same as is used for allowances and deductions in the HCV program.
- (3) Existing families receiving Mainstream vouchers, where the eligible family member is now 62 or older, will not “age out” of the program as long as the family was eligible on the day it was first assisted under a HAP contract.
- (4) Opportunity Home may not implement eligibility screening criteria for Mainstream vouchers that differ from the regular HCV program.

19.6.C Partnership and Supportive Services [Notice PIH 2020-01]

- (1) Opportunity Home is encouraged but not required to establish formal and informal partnerships with a variety of organizations that assist



persons with disabilities to help ensure eligible participants find and maintain stable housing.

(a) Opportunity Home will implement a Mainstream program in partnership with The Center for Health Care Services (CHCS) and Alamo Area Council of Governments (AACOG).

19.6.D Waitlist Administration [Notice PIH 2024-30]

- (1) For Mainstream vouchers, HUD has waived 24 CFR 982.204(f), which requires one waitlist for the HCV program and allows Opportunity Home the discretion to operate a separate Mainstream voucher waitlist from the general HCV waitlist. This is optional.
- (2) If Opportunity Home chooses to create a separate Mainstream waitlist, the PHA must notify families on the HCV waitlist of the separate Mainstream waitlist and provide an opportunity for families on the HCV list to be placed on the Mainstream list.
- (3) If Opportunity Home does not pursue the optional waiver to maintain a separate Mainstream waitlist, Opportunity Home must still ensure program access for individuals with disabilities.

(a) Opportunity Home will not establish a separate waitlist for the Mainstream program.

19.6.E Preferences [Notice PIH 2024-30]

- (1) While Opportunity Home may establish local preferences based on local housing needs and priorities in accordance with 24 CFR 982.207(a), HCV regulations do not permit Opportunity Home to establish separate preferences for Mainstream voucher applicants. HUD waived 24 CFR 982.207(a)(1) and allows Opportunity Home to establish separate preferences for Mainstream voucher applicants. However, Opportunity Home may not apply a residency preference to Mainstream voucher applicants.
- (2) PHAs with outstanding Olmstead-related litigation or enforcement activities, as well as those undertaking affirmative Olmstead planning and implementation efforts, who wish to establish preferences that target individuals with specific disabilities must request HUD approval.



The process for requesting approval for a remedial preference targeting individuals with specific disabilities is outlined in Notice PIH 2012-31.

- (3) Regardless of whether Opportunity Home chooses to adopt separate Mainstream voucher preferences, if Opportunity Home claimed points for a preference in a NOFO application for Mainstream vouchers, Opportunity Home must adopt a preference for at least one of the targeted groups identified in the NOFO. Opportunity Home may choose to apply NOFO preferences to the entire HCV waitlist or only to the Mainstream voucher applicants as a separate Mainstream voucher preference.
- (4) Opportunity Home may use either date and time of application or a drawing or other random choice technique in selecting families from the Mainstream waiting list among applicants with the same preference status in accordance with the PHA's administrative plan.

19.6.F Voucher Issuance [Notice PIH 2024-30]

(1) Initial Search Term

- (a) For Mainstream vouchers, HUD waived 24 CFR 982.303(a), which requires an initial search term of at least 60 days, and established an alternative requirement that the initial search term for a Mainstream voucher be at least 120 days. Opportunity Home is permitted to establish local preferences, and to give priority to serving families that meet those criteria.
- (b) The initial 120-day term also applies when a family chooses to move to a new unit with continued assistance inside or outside the Opportunity Home's jurisdiction.
- (c) When issuing a Mainstream voucher, Opportunity Home must also provide a current listing of available, accessible units known to Opportunity Home and, if necessary, otherwise assist the family in identifying an accessible unit.

(i) The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days.

(2) Voucher Extension

- (a) Opportunity Home's Administrative Plan must describe Opportunity Home's policies for granting extensions to the initial 120-day voucher term and provide clear instructions to families



on the procedures for requesting an extension. If a family requires additional time, Opportunity Home is required to provide an extension as a reasonable accommodation.

- (b) Opportunity Home must adopt an extension policy for Mainstream vouchers that includes the following:
 - (i) Each extension must be for a minimum of 90 days;
 - (ii) Opportunity Home must approve the first extension request, regardless of how the request is made (written or verbal) or when it is made, as long as the request is made on or before the expiration date of the voucher and is consistent with applicable requirements (subsequent requests should be processed in accordance with the Opportunity Home's Administrative Plan); and
 - (iii) Opportunity Home must, on at least one occasion after voucher issuance, notify the family prior to the expiration of the initial term to remind them of the expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search.
- (c) As part of its search extension policy, Opportunity Home may not restrict a first extension approval to certain circumstances or require documentation from applicants. For all extension requests, a written or verbal request is sufficient.
- (d) In providing notice to families of the expiration date and extension request process, Opportunity Home must ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.
- (e) Opportunity Home must approve all extensions made as a reasonable accommodation, and Opportunity Home must provide this information during the family briefing.

- (i) At least 30 days prior to the expiration of the initial term of the voucher, Opportunity Home will contact the family to remind them of the expiration date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search.



- (ii) Depending on the family's preferred method of communication, Opportunity Home may contact the family via telephone, text message, email, or other accessible communication method.
- (iii) Opportunity Home will ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.
- (iv) Families may request an extension, either orally or in writing, at any time prior to the expiration of the family's voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation.
- (iv) The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation.

19.6.G Portability [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

- (1) Mainstream voucher participants are eligible for portability under standard portability rules and all Opportunity Home policies regarding portability in Chapter 10.
- (2) The following special considerations for Mainstream vouchers apply under portability:
 - (a) If the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream voucher.
 - (b) If the receiving PHA chooses to absorb the voucher, the voucher will be considered a regular voucher, or a Mainstream voucher if the receiving PHA has a Mainstream voucher available, and the Mainstream voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.



- (3) The participant may receive a regular voucher if the receiving PHA does not have a Mainstream voucher available.

19.6.H Project-Basing Mainstream Vouchers [FY19 Mainstream Voucher NOFA Q&A]

- (1) Opportunity Home may project-base Mainstream vouchers in accordance with all applicable PBV regulations and Opportunity Home policies in Chapter 18.
- (2) Opportunity Home is responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), Titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR Part 8; 28 CFR Parts 35 and 36; and 24 CFR Part 100.
- (3) Mainstream vouchers are subject to the PBV program percentage limitation discussed in Chapter 18.

Early Engagement Program

Reason for the Addition of Section 4.3.E Early Engagement Program

The new section 4.3.E may impact program applicants. The new section includes the policy for the Early Engagement Program, which will require applicants selected from the waitlist to attend an Opportunity Home-sponsored briefing before or after determining eligibility for participation.

4.3.E Early Engagement Program

All applicants selected from the waiting list, with the exception of elderly and disabled applicants must attend an Opportunity Home-sponsored Early Engagement Program (EEP) briefing before or after they are determined eligible for participation. Generally, applicants are required to attend the EEP briefing prior to voucher issuance. However, Opportunity Home may waive this requirement and issue a voucher to an applicant before they have attended the EEP briefing, if doing so would remove a barrier for the family in quickly securing and/or leasing a suitable unit. Failure to attend a required EEP briefing may be cause for denial.



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 Affordable Housing 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 Affordable Housing 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 \$63 million in capital repairs to extend the useful life at 25 properties and approximately 2,442 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 2026 - FY 2030).

Fiscal Year (FY) ³ Property Capital Fund Grant Year (CFP)	Property	Units Preserved ⁴	Description	Planned Investment (\$)
FY 2026-27 CFP23-25 (Current)	PHA Wide		Ph.II Intrusion Protection/Security Cameras	1,500,000
	Blanco	100	Housing Related Hazard Improv	1,000,000
	Cassiano	499	Foundation Repairs	150,000
	College Park	78	A/C Upgrades	200,000
	Escondida	20	Elevator Modernization	150,000
	Fair Avenue	216	Elevator/ Water Softener/ Boiler	1,000,000
	Kenwood North	53	Elevator Modernization	175,000
	Matt Garcia	55	Housing Hazards Improvements	1,000,000
	Riverside	74	PNA Substantial Renovation	6,801,000
	Tarry Towne	12	Burn Restoration	1,140,000

³ Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2025 begins on July 1, 2025 and ends on June 30, 2026. Capital grants are awarded to Opportunity Home SA every year. Opportunity Home SA then allocates funds based on capital needs.

⁴ 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 (Affordable Housing Communities) 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.

⁵ Funding sources may be a combination of Capital grants, MTW, sale net proceeds, insurance proceeds, city housing bond funds and federal earmark funds.



	Villa Hermosa	66	Boiler / HVAC Replacement	200,000
	Westway	152	Security Gates/ Lighting/ Parking Lot	238,000
		1,325		13,116,438
FY 2027-28	Tarry Towne	98	PNA Substantial Renovation	4,800,000
CFP26	Jewett Circle	75	PNA Substantial Renovation	2,400,000
	Beldon	35	PNA Substantial Renovation	\$2,860,000
	South San	30	PNA Substantial Renovation	\$670,000
	William Sinkin	50	PNA Substantial Renovation	\$1,100,000
	Linda Lou	10	PNA Substantial renovation	500,000
		298		12,330,000
FY 2028-29	Fair	216	PNA Substantial Renovation	6,700,000
CFP27	Francis Furey	66	PNA Substantial Renovation	2,140,000
		282		8,840,000
FY 2029-30	Westway	152	PNA Substantial Renovation	4,000,000
CFP28	Villa Tranchese	201	PNA Substantial Renovation	12,000,000
		353		16,000,00
FY 2030-31	Highview	68	PNA Substantial Renovation	3,700,000
CFP29		68		3,700,000
FY 2031-32	Olive Park	26	PNA Substantial Renovation	3,000,000
CFP30	Village East	24	PNA Substantial renovation	3,000,000
	Villa Hermosa	66	PNA Substantial renovation	3,500,000
		116		9,500,000
GRAND TOTAL		2,442		63,486,438

1. B. Affordable Housing 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 Affordable Housing 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 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 Affordable Housing 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 ⁶	Property	Units Preserv	Description	Planned Investment
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6.



		ed ⁷		(\$) ⁸
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
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
		338		TOTAL
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

⁷ 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 (Affordable Housing Communities) 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.

⁸ 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.



	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 lot (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 ⁹	Property	Units Preserved ¹⁰	Description	Planned Investment (\$) ¹¹
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⁹ 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.

¹⁰ 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 (Affordable Housing Communities) 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.

¹¹ 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.



2023-2024¹²			
		Replacement or repair of Interior, Exterior & Site Improvements	4,000,000
Burning Tree	108		
Villa de Valencia	104	Replacement or repair of siding	250,000
Dietrich Road	30	Replacement or repair of shingle roof	394,000
Woodhill	532	Replacement or repair of parking lots, siding, windows	6,775,000
Cottage Crk I-II	449	Replacement or repair of sidewalks, parking lot, gutters, AC, fencing	1,733,000
Woodhill			
Costa Valencia	762	Foundation Stabilization	133,000
Towering Oaks	128	Replacement or repair of AC and community 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 of fencing, paint trim, railings	188,000
Science Park	120	Replacement or repair of sidewalks, gutters, AC, lighting, entry doors, mitigation / Replacement or repair of fencing, paint trim, railings	379,000
Reagan	15	Replacement or repair of roofs and parking lots	100,000
Refugio	210	Replacement or repair of AC, drywall, entry doors, roofs / Replacement or repair of fencing, parking lots, roofs	494,000
Villa de San Alfonso	29	Replacement or repair of pavement, AC, elevator / Replacement or repair of parking lot, fencing, signage	103,000

¹² 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.



		3,196	TOTAL	18,955,000
2024-2025			Drainage repairs (Berin/Swale), restripe parking	
	Converse Ranch I	124		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			Parking lots improvements - Patch-Seal-Stripe, fencing, signage	
	Bella Claire	67		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			Paint and repair stucco, paint and update fencing, parking lots and roofs	
	Rosemont at Highland	252		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			Parking, fencing, and signage	
	San Alfonso	29		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		PH/ PBV	PBR A	30%	40%	50%	60%	70%	80%	Market
				Development Cost (\$)	Total Units									
100 Labor ¹²	D1	Franklin	HUD 221(d)(4)	52,438,321	213	0	44	0	0	0	0	0	0	169
Bristol at Somerset	D4	Louis Poppoon Development Consulting	4% Tax Credit & Bonds	63,331,807	348	0	0	0	0	0	348	0	0	0
Horizon Pointe	D2	Integrated Realty Group	4% Tax Credits & Bonds	65,639,352	312	0	0	20	35	106	0	151	0	0
Josephine	D1	Lynd	Conventional Loan	68,463,888	259	0	0	0	0	0	26	0	104	129
Vista at Interpark	D9	Atlantic Pacific Comm.	9% Tax Credits	17,554,339	64	0	0	7	0	16	41	0	0	0
Vista at Everest	D1	Atlantic Pacific Comm.	9% Tax Credits	18,109,812	64	0	0	7	0	16	41	0	0	0
Total				285,537,519	1,260	0	44	34	35	138	456	151	104	298

¹Opportunity Home owned land

²Planned 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		PH/ PBV	AMI LEVEL						Market	
				Development Cost (\$)	Total Units		30%	40%	50%	60%	70%	80%		
Fiesta Trails ²	D8	NRP	9% Tax Credits	21,112,430	60	0	18	0	12	30	0	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	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

¹Opportunity Home owned land

²Planned 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								Market
						PH/PBV	30%	40%	50%	60%	70%	80%		
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 Phase ¹	D4	Louis Poppoon Development Consulting	4% Tax Credit & Bonds	81,179,517	348	0	52	0	0	174	122	0	0	
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	

¹Opportunity Home owned land

²Planned 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	Total Units	PH/PBV	30%	40%	50%	60%	70%	80%	Market
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				nt Cost (\$)				
Victoria Commons - South Pond ¹	D1	Catellus	TBD	TBD		TBD		
Victoria Commons - Townhomes ¹	D1	Catellus	TBD	TBD		TBD		
Alazan Expansion ¹²	D5	Opportunity Home	MTW/ CoSA Bonds	28,116,444	88	88		
Total				28,116,444	88	0 88	0	0 0 0

¹Opportunity Home owned land

²Planned 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 will offset units that must be relocated away from the Alazan Courts and provide a phasing plan that aims to ensure no displacement of families from the near-Westside neighborhood during redevelopment. This expansion is for 88 new residential housing units located in the baseball field behind the Alazan Community Center and within an adjacent block of Apache Courts. The development totals 110,304 sq ft, with a proposed unit mix of 12 1-bedrooms, 40 2-bedrooms, 16 3-bedrooms, and 20 4-bedrooms.

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

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.

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. The Organization also maintains an affordable housing portfolio, Affordable



Housing Communities, and expects to evaluate and make investments in these properties as part of an organization-wide preservation effort.

As a result of these investments, the organization anticipates preserving a total of 1,454 units which includes 158 of public housing / project-based voucher units, 1,276 affordable units (under 80% AMI) that will be MTW local non-traditional eligible units, and 12 market units.

Project Name	District	Type of Tax Credit	Proposed Action	Total Units	PH/PBV	Local Non-Traditional Eligible Units						Market
						30%	40%	50%	60%	70%	80%	
Alhambra	D4	9% Tax Credits	Refinance / Acquisition 2024	140	14	0	0	0	120	0	0	6
San Juan Square I	D5	9% Tax Credit	Refinance / Acquisition 2024	143	46	0	0	0	91	0	0	6
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 Credits & Bonds	Refinance / Acquisition 2024	228	0	0	0	0	228	0	0	0
Refinance / Acquisition 2024 Total				763	60	0	0	0	691	0	0	12
Hemisview Village	D1	4% Tax Credits & Bonds	Refinance / Acquisition 2025	245	49	0	0	12	184	0	0	0
Artisan at Creekside	D5	4% Tax Credits & Bonds	Refinance / Acquisition 2025	252	0	0	0	0	252	0	0	0
Sutton Oaks I	D2	9% Tax Credit	Refinance / Acquisition 2025	194	49	0	0	28	109	0	0	8
Refinance / Acquisition 2025 Total				691	98	0	0	40	545	0	0	8
Grand Total				1,454	158	0	0	40	1,236	0	0	20

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
Adjacent to TPSO and Sutton Oaks I	112737	719 RUNNELS AVE
	112739	731 RUNNELS AVE
Costa Mirada	480339	9323 SOMERSET RD
Vacant parcel near Mirasol	419759	4262 W CESAR E CHAVEZ BLVD

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
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	Miller Child
115585	2415 EZELL	Development Center /
115586	E COMMERCE ST	Springview
115588	2902 E COMMERCE ST	Springview
115589	2906 E COMMERCE ST	
115590	2910 E COMMERCE ST	
115595, 115597	2603 EZELL	
115600	2607 EZELL	
115602, 115603	2944 E COMMERCE ST	
115808	903 HEDGES ST	
115809	909 HEDGES ST	
115810	913 HEDGES ST	
115811	915 HEDGES ST	Parcels near Springview
115812	917 HEDGES ST	
115813	927 HEDGES ST	



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	Adjacent to TPSO and Sutton Oaks I
112746	1011 LOCKE ST	
141735	509 SALTILLO ST	Vacant parcel
151169	4063 BREMEN ST	Vacant parcel
374851	1828 E CROCKETT ST	
374892	925 POTOMAC	
374931	920 POTOMAC	
377155	1754 N CENTER	
377159	1715 N CENTER	
380324	939 POINSETTIA	
380325	943 POINSETTIA	
380357	906 N GRIMES	Eastside Lots - possible home ownership
441311	1071 POINSETTIA	
512161	E COMMERCE ST	
551676	1822 ARBOLEDA ST	
580339	7822 GLIDER AVE	
114103	1418 HAYS ST	
115258	1528 PASO HONDO	
115259	1528 PASO HONDO	



Appendix F | Third-Party Lease Agreements

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

Appendix 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	Property	Leased Premises	Lessee
Standard Lease Agreement for Communication Facilities	Parkview	114 Hickman	AT&T (Formerly New Cingular Wireless)
	Fair Avenue	1215 Fair Avenue	AT&T (Formerly New Cingular Wireless)
	San Pedro	2103 San Pedro	T-Mobile (Formerly Sprint Spectrum Realty Company)
	Villa Tranchese	307 Marshall	T-Mobile West LLC
	Victoria Plaza	411 Barrera	Cellco Partnership d/b/a Verizon Wireless
Services	Mirasol	611 SW 28th	Avance
	Mirasol	630 S. General McMullen	Ricardo Salinas Health Center
	Springview	102 South Rio Grande	Miller Child Development Center INC



Appendix G | Alternative Definition to Self-Sufficiency

Update: The alternative definition was proposed and approved as part of the FY2024 MTW Planning process.

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”¹³, 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?”

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





A COMMUNITY OF POSSIBILITIES