





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

BOARD OF COMMISSIONERS

**Estrellita
Garcia-Diaz**
Chair

**Leilah
Powell**
Vice Chair

**Barbara Ankamah
Burford**
Commissioner

Janet Garcia
Commissioner

David Huete
Commissioner

**Taneka "Nikki"
Johnson**
Commissioner

Kayla Miranda
Commissioner

PRESIDENT & CEO

Michael Reyes

REGULAR BOARD MEETING

1:00 p.m. | Wednesday | March 4, 2026

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.

MEETING CALLED TO ORDER

1. The Board of Commissioners or its Committee may hold a closed meeting pursuant to Texas Government Code § 551.071-076 for consultation concerning attorney-client matters, real estate, litigation, personnel, and security matters. The Board or Committee reserves the right to enter into a closed meeting at any time during the course of the meeting.

CITIZENS TO BE HEARD

2. **Citizens to be Heard** at approximately 1:00 p.m. (may be heard after this time). Citizens wishing to speak on any issues, including ones not related to items posted on the agenda, should personally request to be placed on the Citizens to be Heard roster prior to 12:45 p.m. Citizens will be given up to three minutes to speak. Each citizen will be permitted to speak only once. A Spanish/English translator will be available to citizens needing translation.

Now is the time for Citizens to be Heard. The Board asks the public to address concerns related to Opportunity Home matters and policy, and not include statements that may be considered defamatory of any individual. The Board encourages members of the public to direct specific concerns or problems to Opportunity Home staff for more prompt resolution. The Board will not discuss the comments of speakers or respond to speakers during the Citizens to be Heard portion of the agenda.

MINUTES

3. Minutes
 - Approval of the February 4, 2026, Regular Board meeting minutes

PUBLIC HEARING

4. Public Hearing regarding the Proposed 2026-2027 MTW Agency Plan Update

INDIVIDUAL ITEMS



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

BOARD OF COMMISSIONERS

**Estrellita
Garcia-Diaz**
Chair

**Leilah
Powell**
Vice Chair

**Barbara Ankamah
Burford**
Commissioner

Janet Garcia
Commissioner

David Huete
Commissioner

**Taneka “Nikki”
Johnson**
Commissioner

Kayla Miranda
Commissioner

PRESIDENT & CEO
 Michael Reyes

5. Consideration and approval regarding Resolution 6802, authorizing an MTW Loan and modification of the LVPFC Loan for the Snowden Apartments Project (Lorraine Robles, Chief Real Estate and Development Officer)
6. Consideration and approval regarding Resolution 6906, authorizing the NOVA Apartments transaction (Timothy E. Alcott, Executive Vice President of Development and General Counsel)
7. Consideration and approval regarding Resolution 6914, authorizing the Durrington Ridge Apartments transaction (Timothy E. Alcott, Executive Vice President of Development and General Counsel)
8. Consideration and approval regarding Resolution 6909, certifying Opportunity Home San Antonio’s Investment Policy and Investment Strategies review (Aaron Sladek, Senior Director, Finance and Accounting)
9. Consideration and approval regarding Resolution 6910, accepting the Independent Auditor’s report for the year ended June 30, 2025 (Aaron Sladek, Senior Director, Finance and Accounting)
10. Consideration and approval regarding Resolution 6911, authorizing the Hemisview Village Apartments debt payoff and limited partner interest acquisition (Bradford McMurray, Chief Asset Management Officer)
11. Consideration and approval regarding Resolution 6913, authorizing the inducement of the Quantum Drive Apartments project (Nicholas Delaunay, Project Manager I, Development Services and Neighborhood Revitalization)

DISCUSSION ITEMS

12. Update and Discussion regarding the Proposed 2026-2027 MTW Agency Plan (Nicholas Tennessee, MTW and Strategy Analyst)
13. Update and Discussion regarding the Quarterly Financial Report (Aaron Sladek, Senior Director of Finance and Accounting)
14. Update and Discussion regarding the Legislative Update (Teresa Menendez Myers, Government and Community Affairs)

BOARD OF COMMISSIONERS

**Estrellita
Garcia-Diaz**
Chair

**Leilah
Powell**
Vice Chair

**Barbara Ankamah
Burford**
Commissioner

Janet Garcia
Commissioner

David Huete
Commissioner

**Taneka "Nikki"
Johnson**
Commissioner

Kayla Miranda
Commissioner

PRESIDENT & CEO

Michael Reyes

15. President's Report

- Organization News and Updates
- Resident and Staff Spotlights and Recognition
- Event and Activity Participation Recaps
- Upcoming Event Participation and Holiday Notifications

CLOSED SESSION

16. Closed Session

Real Estate/Consultation with Attorney

Deliberate the management, purchase, exchange, lease, or value of certain real properties and obtain legal advice regarding related legal issues pursuant to Texas Government Code Sec. 551.072 (real property) and Texas Government Code Sec. 551.071 (consultation with attorney).

- Discussion and consultation with attorney regarding legal concerns related to the Horizon Pointe Development

REPORT

- Procurement Activity Report

RESOURCES

- Developments Overview Table
- Development Process Table

17. Adjournment

Posted on: 2/26/2026 5:00 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 the 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.

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

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



MINUTES OF OPPORTUNITY HOME SAN ANTONIO REGULAR BOARD MEETING

Meeting Called to Order

I. Call to Order

Chair Garcia-Diaz called the Regular Board Meeting of Opportunity Home San Antonio to order at 1:06 PM CST on February 4, 2026. The meeting was held at Cassiano Homes located at 2919 S. Laredo St., San Antonio, TX 78207.

Board Members Present:

Chair Estrellita Garcia-Diaz, Vice Chair Leilah Powell, Barbara Ankamah Burford, Janet Garcia, Taneka "Nikki" Johnson, and Kayla Miranda.

Non-Voting Board Members Present:

David Huete.

Adviser Present:

Valerie Carillo, General Counsel.

Guests Present:

Michael Reyes, President and CEO; George Ayala, Director of Procurement; Edgar Olivas, Assistant Director, Development Services and Neighborhood Revitalization; Victoria Febus, Director of Affordable Housing Communities; Nicholas Delaunay, Project Manager I, Development Services and Neighborhood Revitalization; Savannah Campos, Project Manager II, Development Services and Neighborhood Revitalization; Lorraine Robles, Chief Real Estate and Development Officer; and Timothy Alcott, Executive Vice President, Development and General Counsel

Katie Stewart Anchondo, Director, Real Estate Development and Government Relations, New Hope Housing, Inc.; Ron Lastimosa, Vice President, Real Estate Development, New Hope Housing, Inc.; Carly Gast, Development Director, Kittle Property Group, Inc.

Interpreter, Universe Technical Translation, Inc. (Spanish and Pashto)

Board Members Absent:

None

Quorum:

A quorum was established with six (6) voting members present.

Citizens to be Heard

II. Citizens to be Heard



Citizens wishing to speak on any issues, including those unrelated to items posted on the agenda, were given three minutes to do so. Five (5) citizens signed up to speak, one (1) citizen spoke, and no (0) citizens ceded their time.

Presentation

III. Presentation

Recognition of Gilbert Casillas, former Commissioner of Opportunity Home San Antonio (Estrellita Garcia-Diaz, Board Chair)

Minutes

IV. Minutes

Vice Chair Powell moved to approve the minutes of the December 10, 2025, Regular Board Meeting. Commissioners Ankamah Burford and Garcia seconded the motion. The motion carried with six (6) in favor and none against by a voice vote.

Individual Items

V. Resolution 6901

Consideration and approval regarding Resolution 6901, the award of a contract for tax credit consulting services to BETCO, Consulting LLC (George Ayala, Director of Procurement; Edgar Olivas, Assistant Director, Development Services and Neighborhood Revitalization)

Main Motion Regarding Resolution 6901

Moved by Vice Chair Powell. Seconded by Commissioner Garcia. The motion carried with six (6) in favor and none against by a voice vote.

VI. Resolution 6902

Consideration and approval regarding Resolution 6902, the award of a contract for moving services and temporary storage for Ravello Apartments to Swift Movers LLC (George Ayala, Director of Procurement; Victoria Febus, Director of Affordable Housing Communities)

Main Motion Regarding Resolution 6902

Moved by Commissioner Ankamah Burford. Seconded by Commissioner Garcia. The motion carried with six (6) in favor and none against by a voice vote.

VII. Resolution 6903

Consideration and approval regarding Resolution 6903, inducement for the proposed 9% low-income housing tax credit project to be known as NHH Culebra (Nicholas Delaunay, Project Manager I, Development Services and Neighborhood Revitalization)

Main Motion Regarding Resolution 6903



Moved by Commissioner Ankamah Burford. Seconded by Commissioner Garcia. The motion carried with six (6) in favor and none against by a voice vote.

VIII. Resolution 6905

Consideration and approval regarding Resolution 6905, Brickstone Apartments inducement and MOU (Savannah Campos, Project Manager II, Development Services and Neighborhood Revitalization)

Main Motion Regarding Resolution 6905

Moved by Vice Chair Powell. Seconded by Commissioner Ankamah Burford. The motion carried with six (6) in favor and none against by a voice vote.

IX. Resolution 6837

Consideration and approval regarding Resolution 6837, Durrington Ridge Apartments inducement and MOU (Timothy Alcott, Executive Vice President, Development and General Counsel)

X. Resolution 6839

Consideration and approval regarding Resolution 6839, NOVA Apartments inducement and MOU (Timothy Alcott, Executive Vice President, Development and General Counsel)

Main Motion Regarding Resolutions 6837 and 6839

With no objections, the Board tabled Resolutions 6837 and 6839 for discussion following Closed Session.

Discussion Items

XII. Affordable Housing Preservation and Rehabilitation Plan

Update and Discussion regarding the Affordable Housing Preservation and Rehabilitation Plan (Lorraine Robles, Chief Real Estate and Development Officer)

XIII. President's Report

- Organization News and Updates
- Third Party Review of Security Camera Procurement Process
- Resident and Staff Spotlights and Recognition
- Event and Activity Participation Recaps
- Upcoming Event Participation and Holiday Notifications

Action Regarding Recess

With no objections, the Board recessed the Regular Board meeting at 2:22 PM CST, and entered into the San Antonio Housing Facility Corporation meeting.

The Board returned from recess at 2:25 PM CST.



Action Regarding Closed Session

With no objections, the Board recessed the Regular Board meeting at 2:26 PM CST, and entered into Closed Session.

XIV. Closed Session

Consultation with Attorney

Deliberate and obtain legal advice regarding legal issues pursuant to Texas Government Code Sec. 551.071 (consultation with attorney)

- Semi-Annual Litigation Update

Real Estate/Consultation with Attorney

Deliberate the management, purchase, exchange, lease or value of certain real properties and obtain legal advice regarding related legal issues pursuant to Texas Government Code Sec. 551.072 (real property) and Texas Government Code Sec. 551.071 (consultation with attorney).

- Update and discussion regarding the Affordable Housing Preservation and Rehabilitation Plan
- Discussion and consultation with attorney regarding the Durrington Ridge Apartments inducement and MOU
- Discussion and consultation with attorney regarding the NOVA Apartments inducement and MOU

The Board returned from Closed Session and reconvened the Regular Board Meeting at 4:38 PM CST.

With no objections, the Board took up Resolutions 6837 and 6839 from the table.

IX. Resolution 6837

Consideration and approval regarding Resolution 6837, Durrington Ridge Apartments inducement and MOU (Timothy Alcott, Executive Vice President, Development and General Counsel)

X. Resolution 6839

Consideration and approval regarding Resolution 6839, NOVA Apartments inducement and MOU (Timothy Alcott, Executive Vice President, Development and General Counsel)

Main Motion Regarding Resolutions 6837 and 6839

Moved by Vice Chair Powell. Seconded by Commissioners Johnson and Garcia. The motion carried with six (6) in favor and none against by a voice vote.

REPORTS

Procurement Activity Report
Quarterly Demographic Procurement Report



A COMMUNITY OF POSSIBILITIES

Internal Audit Update
Recruitment and Staffing Update
Quarterly Operations Report

RESOURCES

Developments Overview Table
Development Process Table

XV. Adjournment

Main Motion Regarding Adjournment

With no objections, Chair Garcia-Diaz adjourned the Regular Board Meeting.

The meeting adjourned at 4:46 PM CST.

ATTEST:

Estrellita Garcia-Diaz
Chair, Board of Commissioners

Date

Michael Reyes
President and CEO

Date



Public Notice of Public Hearing

Regarding the Opportunity Home San Antonio Proposed 2026 – 2027 MTW Agency Plan

Take notice that a 30-day public comment period began on Tuesday, February 18, 2026, and ends on Friday, March 20, 2026, on the Opportunity Home San Antonio Proposed 2026 – 2027 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, Capital Fund Program Plan, and the Family Self-Sufficiency (FSS) Program Action Plan.

Comments on changes may be delivered by electronic mail to mtw@homesa.org. All comments are due by 5:00 pm on March 20, 2026.

Take notice that a Public Hearing of the Board of Commissioners will be held at Opportunity Home Central Office at 818 S Flores St., San Antonio, TX, 78204 and commencing on March 4, 2026, to consider items shown on the attached agenda.

Documents are available for viewing online at www.homesa.org/moving-to-work.

DATED: February 18, 2026

Opportunity Home San Antonio

Signed by


33A0F1EEDAA1470...

Michael Reyes
President and CEO

OPPORTUNITY HOME ACCESSIBILITY STATEMENT

Meeting site is accessible to handicapped persons.

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

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026****BOARD OF COMMISSIONERS****Regular Board Meeting**

RESOLUTION 6802, AUTHORIZING: (1) A PERMANENT LOAN OF UP TO \$4,000,000 (THE “MTW LOAN”) IN MOVING TO WORK GRANT FUNDS FROM OPPORTUNITY HOME SAN ANTONIO (“OPPORTUNITY HOME”) TO SNOWDEN APARTMENTS, LP (“PROJECT OWNER”) AS APPROVED BY HUD ON SEPTEMBER 4, 2025, FOR THE 2025-2026 MTW PLAN, IN CONNECTION WITH THE SNOWDEN APARTMENTS (“PROJECT”); (2) MODIFICATION OF THE EXISTING \$2,000,000 LAS VARAS PUBLIC FACILITY CORPORATION LOAN TO PROJECT OWNER (“LVPFC LOAN”), EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (3) THAT THE SAN ANTONIO HOUSING FACILITY CORPORATION (“SAHFC”), ACTING AS THE SOLE MEMBER OF THE GENERAL PARTNER OF PROJECT OWNER, APPROVE RESOLUTION 25FAC-09-01 AUTHORIZING THE MTW LOAN, A PERMANENT LOAN FROM PNC BANK, NATIONAL ASSOCIATION, AND THE MODIFICATION OF THE LVPFC LOAN ON BEHALF OF THE PROJECT OWNER; (4) THAT THE LAS VARAS PUBLIC FACILITY CORPORATION (“LAS VARAS”) APPROVE RESOLUTION 25LVPFC-09-01 AUTHORIZING THE MODIFICATION OF THE LVPFC LOAN; AND (5) THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTION AND OTHER MATTERS IN CONNECTION THEREWITH

Signed by:

**Michael Reyes**

President and CEO

Lorraine Robles

Chief Real Estate and Development Officer

REQUESTED ACTION:

Consideration and approval regarding Resolution 6802, authorizing: (i) a permanent loan of up to \$4,000,000 (the “MTW Loan”) in Moving To Work Grant Funds from Opportunity Home San Antonio (“Opportunity Home”) to Snowden Apartments, LP (“Project Owner”) as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan, in connection with the Snowden Apartments (“Project”); (2) modification of the existing \$2,000,000 Las Varas Public Facility Corporation Loan to Project Owner (“LVPFC Loan”), extending its maturity date, making it payable out of available net cash flow, and subordinating its payment to permanent financing; (3) that the San Antonio Housing Facility Corporation (“SAHFC”), acting as the sole member of the general partner of project owner, approve Resolution 25FAC-09-01 authorizing the MTW Loan, a permanent loan from PNC Bank, National Association, and the modification of the LVPFC Loan on behalf of the Project Owner; (4) that the Las Varas Public Facility Corporation (“Las Varas”) approve Resolution 25LVPFC-09-01 authorizing the modification of the LVPFC Loan; and (5) the execution of all documentation necessary to carry out the transaction and other matters in connection therewith.

SUMMARY:

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

Snowden Apartment is a 135-unit new-construction apartment complex for Seniors ages 62 and older, sponsored by Opportunity Home and located on approximately 6.856 acres at 7223 Snowden Road, San Antonio, Bexar County, Texas. The development provides a mix of one- and two-bedroom units with appropriate design considerations and amenities, and is 100% affordable at 60% area median income or less. The Project's owner, Snowden Apartments, LP ("Project Owner"), is controlled by San Antonio Housing Facility Corporation ("SAHFC"), which qualifies the Project for a 100% property tax exemption.

Financing for the Project was obtained through a conventional construction loan, various loans from Opportunity Home and its affiliates, and equity from the sale of 9% Housing Tax Credits. The construction and lease-up of the Project is complete and is ready to convert to permanent financing. Unfortunately, the original "public housing-like" subsidy program failed to materialize, requiring the units to be converted to Project-Based Vouchers (PBV) under an HAP Contract, which has delayed the permanent loan conversion. Additionally, current operating expenses exceed the original projected costs, which include a significant increase in insurance premiums due to Freddie Mac requirements. Furthermore, these factors may decrease the originally anticipated permanent loan amount. The Project Owner proposes that Opportunity Home make a new loan to the Project Owner in an amount not to exceed \$4,000,000 in MTW funds, as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan, and that LVPFC permit its bridge loan (currently due on December 31, 2026) to become a long-term loan, payable out of available cash flow. The MTW Loan and Opportunity Home's prior loan of MTW funds to the Project Owner will be subordinate to the long-term LVPFC loan. A request is made that Opportunity Home authorize SAHFC to accept the MTW Loan and the Permanent Loan, and to accept the modifications of the LVPFC Loan, acting in its role as the Sole Member of the general partner of the Project Owner. A request is made for Opportunity Home to authorize Las Varas to modify the terms of the LVPFC Loan.

STRATEGIC OUTCOMES:

Residents live in quality, affordable housing.

Residents have a sufficient supply of affordable housing options.

ATTACHMENTS:

Resolution 6802

Resolution 25LVPFC-09-01

Resolution 25FAC-09-01

Slides

**CERTIFICATE FOR RESOLUTION
RESOLUTION 6802**

The undersigned officer of San Antonio Housing Authority, a/k/a Opportunity Home San Antonio (the "Authority"), hereby certifies as follows:

1. In accordance with the Bylaws of the Authority, the Board of Commissioners of the Authority (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 6802, AUTHORIZING: (1) A PERMANENT LOAN OF UP TO \$4,000,000 (THE "MTW LOAN") IN MOVING TO WORK GRANT FUNDS FROM OPPORTUNITY HOME SAN ANTONIO ("OPPORTUNITY HOME") TO SNOWDEN APARTMENTS, LP ("PROJECT OWNER") AS APPROVED BY HUD ON SEPTEMBER 4, 2025, FOR THE 2025-2026 MTW PLAN, IN CONNECTION WITH THE SNOWDEN APARTMENTS ("PROJECT"); (2) MODIFICATION OF THE EXISTING \$2,000,000 LAS VARAS PUBLIC FACILITY CORPORATION LOAN TO PROJECT OWNER ("LVPFC LOAN"), EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (3) THAT THE SAN ANTONIO HOUSING FACILITY CORPORATION ("SAHFC"), ACTING AS THE SOLE MEMBER OF THE GENERAL PARTNER OF PROJECT OWNER, APPROVE RESOLUTION 25FAC-09-01 AUTHORIZING THE MTW LOAN, A PERMANENT LOAN FROM PNC BANK, NATIONAL ASSOCIATION, AND THE MODIFICATION OF THE LVPFC LOAN ON BEHALF OF THE PROJECT OWNER; (4) THAT THE LAS VARAS PUBLIC FACILITY CORPORATION ("LAS VARAS") APPROVE RESOLUTION 25LVPFC-09-01 AUTHORIZING THE MODIFICATION OF THE LVPFC LOAN; AND (5) THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTION AND OTHER MATTERS IN CONNECTION THEREWITH

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified

officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Bylaws of the Authority.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
President and CEO

**Opportunity Home San Antonio
Resolution 6802**

RESOLUTION 6802, AUTHORIZING: (1) A PERMANENT LOAN OF UP TO \$4,000,000 (THE “MTW LOAN”) IN MOVING TO WORK GRANT FUNDS FROM OPPORTUNITY HOME SAN ANTONIO (“OPPORTUNITY HOME”) TO SNOWDEN APARTMENTS, LP (“PROJECT OWNER”) AS APPROVED BY HUD ON SEPTEMBER 4, 2025, FOR THE 2025-2026 MTW PLAN, IN CONNECTION WITH THE SNOWDEN APARTMENTS (“PROJECT”); (2) MODIFICATION OF THE EXISTING \$2,000,000 LAS VARAS PUBLIC FACILITY CORPORATION LOAN TO PROJECT OWNER (“LVPFC LOAN”), EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (3) THAT THE SAN ANTONIO HOUSING FACILITY CORPORATION (“SAHFC”), ACTING AS THE SOLE MEMBER OF THE GENERAL PARTNER OF PROJECT OWNER, APPROVE RESOLUTION 25FAC-09-01 AUTHORIZING THE MTW LOAN, A PERMANENT LOAN FROM PNC BANK, NATIONAL ASSOCIATION, AND THE MODIFICATION OF THE LVPFC LOAN ON BEHALF OF THE PROJECT OWNER; (4) THAT THE LAS VARAS PUBLIC FACILITY CORPORATION (“LAS VARAS”) APPROVE RESOLUTION 25LVPFC-09-01 AUTHORIZING THE MODIFICATION OF THE LVPFC LOAN; AND (5) THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTION AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio, a Texas municipal public housing authority and governmental entity (“Opportunity Home”), has approved and created the San Antonio Housing Facility Corporation, a Texas nonstock nonprofit corporation and instrumentality of Opportunity Home (“SAHFC”), and the Las Varas Public Facility Corporation, a Texas nonstock, nonprofit corporation and instrumentality of Opportunity Home (“Las Varas”); and

WHEREAS, SAHFC and Las Varas, on behalf of Opportunity Home, are empowered to finance the costs of public facilities that will provide decent, safe, and sanitary housing for persons of low income in the City of San Antonio; and

WHEREAS, Opportunity Home is the sponsor of Snowden Apartments, a 135-unit housing tax credit development for seniors located at 7223 Snowden Road, San Antonio, Bexar County, Texas 78240 (the “Project”), which has been developed by Snowden Apartments, LP, a Texas limited partnership (the “Project Owner”); and

WHEREAS, as sponsor of the Project, Opportunity Home previously authorized a loan of Moving to Work Grant Funds (MTW) under Resolution 6273 as part of the initial financing for the Project; and

WHEREAS, the original “public housing-like” subsidy program failed to materialize, requiring the units to be converted to Project-Based Vouchers (PBV) under a HAP Contract, resulting in delays in the permanent loan conversion. Additionally, current operating expenses exceed the original projected costs, which include a significant increase in insurance premiums due to Freddie Mac requirements. Furthermore, these factors may decrease the originally anticipated permanent loan amount; and

WHEREAS, Opportunity Home has been requested to provide an additional loan to the Project Owner of an amount not to exceed \$4,000,000 in Moving to Work Grant Funds (the “MTW Loan”) as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan; and

WHEREAS, the Project Owner intends to enter into a permanent loan from PNC Bank, National Association, in an amount not to exceed \$8,055,000 (the “Permanent Loan”); and

WHEREAS, in order to have funds available to finance lien-free construction, the Project Owner has requested that the existing \$2,000,000 in bridge financing from Las Varas (the “LVPFC Loan”) be modified to be payable out of Project Owner’s available net cash flow, with its maturity extended beyond the Permanent Loan’s Maturity Date, and the MTW Loan and Opportunity Home’s prior loan of MTW funds to the Project Owner will be subordinate to the long-term LVPFC loan; and

WHEREAS, in order to implement these transactions, SAHFC, acting in its role as the sole member of Snowden Apartments GP, LLC, the general partner of the Project Owner, has requested authorization to execute any and all necessary documents and extensions related to the MTW Loan, the Permanent Loan, and the modification of the LVPFC Loan; and

WHEREAS, in order to implement these transactions, Las Varas has requested authorization to execute any and all necessary documents and extensions related to the modification of the LVPFC Loan; and

WHEREAS, the Board is being asked to authorize and ratify all of the actions necessary to make and approve the MTW Loan and the Permanent Loan and to modify the LVPFC Loan in order to assist in permanently financing the complete lien-free construction of the Project.

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

- 1) Approves Resolution 6802, authorizing: (i) a permanent loan of up to \$4,000,000 (the “MTW Loan”) in Moving To Work Grant Funds from Opportunity Home San Antonio (“Opportunity Home”) to Snowden Apartments, LP (“Project Owner”) as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan, in connection with the Snowden

Apartments ("Project"); (2) modification of the existing \$2,000,000 Las Varas Public Facility Corporation Loan to Project Owner ("LVPFC Loan"), extending its maturity date, making it payable out of available net cash flow, and subordinating its payment to permanent financing; (3) that the San Antonio Housing Facility Corporation ("SAHFC"), acting as the sole member of the general partner of project owner, approve Resolution 25FAC-09-01 authorizing the MTW Loan, a permanent loan from PNC Bank, National Association, and the modification of the LVPFC Loan on behalf of the Project Owner; (4) that the Las Varas Public Facility Corporation ("Las Varas") approve Resolution 25LVPFC-09-01 authorizing the modification of the LVPFC Loan; and (5) the execution of all documentation necessary to carry out the transaction and other matters in connection therewith.

- 2) Approves Resolution 25FAC-09-01 of SAHFC, authorizing the transactions for the Project.
- 3) Approves Resolution 25LVPFC-09-01 of Las Varas, authorizing the modification of the LVPFC Loan.
- 4) Authorizes Michael Reyes, as President and CEO, Timothy Alcott, as Executive Vice President of Development and General Counsel, or any other Officer or Commissioner of the Authority, to execute all necessary documents associated therewith.

If any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the validity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.

The recitals of this Resolution are hereby found to be true and are incorporated herein for all purposes.

This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes

President and CEO

**CERTIFICATE FOR RESOLUTION
RESOLUTION 25FAC-09-01**

The undersigned officer of San Antonio Housing Facility Corporation (“SAHFC”), hereby certifies as follows:

1. In accordance with the Bylaws of SAHFC, the Board of Directors of SAHFC (the “Board”) held a meeting on March 4, 2026 (the “Meeting”) of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 25FAC-09-01, AUTHORIZING SAN ANTONIO HOUSING FACILITY CORPORATION, IN ITS CAPACITY AS SOLE MEMBER OF THE GENERAL PARTNER OF SNOWDEN APARTMENTS, LP, TO: (1) ENTER INTO A NEW MOVING TO WORK LOAN FROM OPPORTUNITY HOME SAN ANTONIO (FORMERLY SAN ANTONIO HOUSING AUTHORITY) IN AN AMOUNT NOT TO EXCEED \$4,000,000 (THE “MTW LOAN”) AS APPROVED BY HUD ON SEPTEMBER 4, 2025, FOR THE 2025-2026 MTW PLAN; (2) RATIFY A CHANGE IN THE EXISTING \$2,000,000 LOAN FROM LAS VARAS PUBLIC FACILITY CORPORATION EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (3) ENTER INTO A PERMANENT LOAN FROM PNC BANK, NATIONAL ASSOCIATION IN AN AMOUNT NOT TO EXCEED \$8,055,000 (THE “PERMANENT LOAN”); AND (4) EXECUTE ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTIONS AND OTHER MATTERS IN CONNECTION THEREWITH

(the “Resolution”) was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board’s minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the Bylaws of the SAHFC.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
Secretary/Treasurer

**San Antonio Housing Facility Corporation
Resolution 25FAC-09-01**

RESOLUTION 25FAC-09-01, AUTHORIZING SAN ANTONIO HOUSING FACILITY CORPORATION, IN ITS CAPACITY AS SOLE MEMBER OF THE GENERAL PARTNER OF SNOWDEN APARTMENTS, LP, TO: (1) ENTER INTO A NEW MOVING TO WORK LOAN FROM OPPORTUNITY HOME SAN ANTONIO (FORMERLY SAN ANTONIO HOUSING AUTHORITY) IN AN AMOUNT NOT TO EXCEED \$4,000,000 (THE “MTW LOAN”) AS APPROVED BY HUD ON SEPTEMBER 4, 2025, FOR THE 2025-2026 MTW PLAN; (2) RATIFY A CHANGE IN THE EXISTING \$2,000,000 LOAN FROM LAS VARAS PUBLIC FACILITY CORPORATION EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (3) ENTER INTO A PERMANENT LOAN FROM PNC BANK, NATIONAL ASSOCIATION IN AN AMOUNT NOT TO EXCEED \$8,055,000 (THE “PERMANENT LOAN”); AND (4) EXECUTE ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTIONS AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, Snowden Apartments, LP, a Texas limited partnership (the “Project Owner”), has developed Snowden Apartments, a 135-unit housing tax credit development for seniors located at 7223 Snowden Road, San Antonio, Bexar County, Texas 78240 (the “Project”); and

WHEREAS, the Project is sponsored by Opportunity Home San Antonio (“Opportunity Home”) and the Project Owner is controlled by San Antonio Housing Facility Corporation (“SAHFC”); and

WHEREAS, SAHFC is the sole member of Snowden Apartments GP, LLC, a Texas limited liability company (the “GP”), which GP serves as the general partner of the Project Owner; and

WHEREAS, construction financing for the Project closed in October 2022, and the Project is complete and undergoing conversion into permanent financing, but the original “public housing-like” subsidy program failed to materialize, requiring the units to be converted to Project-Based Vouchers (PBV) under a HAP Contract, which has resulted in delays in the Permanent Loan conversion. Additionally, current operating expenses exceed the original projected costs, which include a significant increase in insurance premiums due to Freddie Mac requirements. Furthermore, these factors may decrease the originally anticipated Permanent Loan amount; and

WHEREAS, the Project Owner has requested (1) to enter into the MTW Loan in an amount not to exceed \$4,000,000 as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan; (2) that the existing \$2,000,000 in bridge financing from Las Varas Public Facility Corporation (“Las Varas”) be modified to be payable out of Project Owner’s available net cash flow, with its maturity extended beyond the Permanent Loan’s maturity date, and that it be subordinated to all

existing and contemplated permanent financing; and (3) to enter into the Permanent Loan in an amount not to exceed \$8,055,000; and

WHEREAS, the MTW Loan will be evidenced by a promissory note and secured by the Project pursuant to a subordinate leasehold deed of trust and such further instruments, assignments, agreements, and documents reasonably necessary to secure the MTW Loan (collectively, the “MTW Loan Documents”); and

WHEREAS, the existing \$2,000,000 loan from Las Varas will be modified pursuant to one or more documents, including, without limitation, a loan modification agreement and one or more subordination agreements (collectively, the “Las Varas Modification Documents”); and

WHEREAS, the Permanent Loan will be made to the Project Owner pursuant to certain documents executed by SAHFC and/or the General Partner and/or the Project Owner including, without limitation, a promissory note in the amount of the Permanent Loan, a leasehold deed of trust secured by the Project, an environmental indemnity agreement, a non-recourse guaranty, subordination agreement(s), a loan and security agreement, assignments and various other documents reasonably necessary to secure the Permanent Loan (collectively, the “Permanent Loan Documents”); and

WHEREAS, the Board of Directors of SAHFC (the “Board”) has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio, Texas, for the various entities to enter into the transactions described above; and

WHEREAS, this Board has reviewed the foregoing and determined that the action herein authorized is in furtherance of the public purposes of SAHFC.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of San Antonio Housing Facility Corporation, hereby:

Section 1. The Project forms of financing contemplated for the Project and described above, including but not limited to the MTW Loan Documents, the Las Varas Modification Documents, and the Permanent Loan Documents, are hereby authorized and approved.

Section 2. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, are hereby authorized to execute the documents required to be executed by SAHFC and/or the GP and/or the Project Owner in order to effectuate such transactions, including without limitation the MTW Loan Documents, the Las Varas Modification Documents, and the Permanent Loan Documents, and all other documents related to the Project to which the Project Owner and/or the GP and/or SAHFC is a party.

Section 3. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, and, if required by the form of the document, the Secretary and any Assistant Secretary, or any of them, of SAHFC are authorized and directed to modify, execute and deliver any of the documents to be signed by or consented to by SAHFC, and any and all certificates and other instruments necessary to carry out the intent thereof and hereof. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them, are authorized to negotiate and approve such changes in, or additions to, the terms of any of the documents, including amendments, renewals, and extensions, as such officers shall deem necessary or appropriate upon the advice of counsel to SAHFC, and approval of the terms of any of the documents by such Officers and this Board shall be conclusively evidenced by the execution and delivery of such documents.

Section 4. The Officers of this Board, or any of them, are authorized to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.

Section 5. The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

Section 6. All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

Section 7. If any provision of this Resolution or the application thereof to any person or circumstance shall be held to be invalid, the remainder of this Resolution and the application of such provision to other persons and circumstances shall nevertheless be valid, and the Board hereby declares that this Resolution would have been enacted without such invalid provision.

Section 8. This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

Section 9. This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes

Secretary/Treasurer

**CERTIFICATE FOR RESOLUTION
RESOLUTION LVPFC25-09-01**

The undersigned officer of Las Varas Public Facility Corporation (“LVPFC”), hereby certifies as follows:

1. In accordance with the Bylaws of LVPFC, the Board of Directors of LVPFC (the “Board”) held a meeting on March 4, 2026 (the “Meeting”) of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

**RESOLUTION 25LVPFC-09-01, AUTHORIZING: (1) MODIFICATION OF LAS
VARAS PUBLIC FACILITY CORPORATION’S EXISTING \$2,000,000 LOAN
TO SNOWDEN APARTMENTS, LP, EXTENDING ITS MATURITY DATE,
MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND
SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (2) THE
EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE
TRANSACTION AND OTHER MATTERS IN CONNECTION THEREWITH**

(the “Resolution”) was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board’s minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the Bylaws of the LVPFC.

SIGNED this 4th day of March 2026.

Michael Reyes
Secretary/Treasurer

Las Varas Public Facility Corporation
Resolution 25LVPFC-09-01

RESOLUTION 25LVPFC-09-01, AUTHORIZING: (1) MODIFICATION OF LAS VARAS PUBLIC FACILITY CORPORATION'S EXISTING \$2,000,000 LOAN TO SNOWDEN APARTMENTS, LP, EXTENDING ITS MATURITY DATE, MAKING IT PAYABLE OUT OF AVAILABLE NET CASH FLOW, AND SUBORDINATING ITS PAYMENT TO PERMANENT FINANCING; (2) THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTION AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, Snowden Apartments, LP, a Texas limited partnership (the "Project Owner"), has developed Snowden Apartments, a 135-unit Housing Tax Credit development for Seniors located at 7223 Snowden Road, San Antonio, Bexar County, Texas 78240 (the "Project"); and

WHEREAS, the Project is sponsored by Opportunity Home San Antonio ("Opportunity Home") and the Project Owner is controlled by San Antonio Housing Facility Corporation (SAHFC"); and

WHEREAS, Las Varas Public Facility Corporation, a Texas nonprofit corporation ("Las Varas"), has made a \$2,000,000 bridge loan to the Project Owner (the "LVPFC Loan"); and

WHEREAS, construction financing for the Project closed in October 2022, and the Project is now complete and undergoing conversion into permanent financing, but the original "public housing-like" subsidy program failed to materialize, requiring the units to be converted to Project-Based Vouchers (PBV) under a HAP Contract, which has resulted in delays in the permanent loan conversion. Additionally, current operating expenses exceed the original projected costs, which include a significant increase in insurance premiums due to Freddie Mac requirements. Furthermore, these factors may decrease the originally anticipated permanent loan amount; and

WHEREAS, the Project Owner intends to obtain a permanent loan amount from PNC Bank, National Association ("PNC") in an amount not to exceed \$8,055,000 (the "Permanent Loan"); and

WHEREAS, the Project Owner has requested that the LVPFC Loan be modified to be payable out of Project Owner's available net cash flow, with its maturity extended beyond the Permanent Loan's maturity date, and that it be subordinated to all existing and contemplated permanent financing except the loan(s) of Moving to Work Grant Funds made by Opportunity Home (whether one or more, the "MTW Loan"); and

WHEREAS, in connection with the modification of the LVPFC Loan, Las Varas will enter into one or more documents, including, without limitation, a loan modification agreement and certain

subordination agreements as may be required by PNC or the Project Owner (collectively, the "Modification Documents"); and

WHEREAS, the Board of Directors of Las Varas (the "Board") has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio, Texas, for Las Varas to enter into the transactions described above; and

WHEREAS, this Board has reviewed the foregoing and determined that the action herein authorized is in furtherance of the public purposes of Las Varas.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of Las Varas Public Facility Corporation, hereby:

Section 1. The Modification Documents are hereby authorized and approved.

Section 2. The modification of the LVPFC Loan is approved, and the President, any Vice President, the Secretary, the Treasurer, and any Assistant Secretary, or any of them acting alone, are hereby authorized to execute the documents required to be executed by Las Varas in order to effectuate such transactions.

Section 3. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, are hereby authorized to execute any and all documentation required for the LVPFC Loan modification, including, but not limited to, the Modification Documents.

Section 4. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, and, if required by the form of the document, the Secretary and any Assistant Secretary, or any of them, of Las Varas are authorized and directed to modify, execute and deliver any of the documents to be signed by or consented to by Las Varas, and any and all certificates and other instruments necessary to carry out the intent thereof and hereof. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them, are authorized to negotiate and approve such changes in, or additions to, the terms of any of the documents, including amendments, renewals, and extensions, as such officers shall deem necessary or appropriate upon the advice of counsel to Las Varas, and approval of the terms of any of the documents by such officers and this Board shall be conclusively evidenced by the execution and delivery of such documents.

Section 5. The Officers of this Board, or any of them, are authorized to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.

Section 6. The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

Section 7. All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

Section 8. If any provision of this Resolution or the application thereof to any person or circumstance shall be held to be invalid, the remainder of this Resolution and the application of such provision to other persons and circumstances shall nevertheless be valid, and the Board hereby declares that this Resolution would have been enacted without such invalid provision.

Section 9. This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

Section 10. This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes,

Secretary/Treasurer

Snowden (Senior) Living



Overview

Requesting up to **\$4,000,000** in MTW funds

- as approved by HUD on September 4, 2025, for the 2025-2026 MTW Plan

Requesting to subordinate the LVPFC \$2,000,000 loan to all current loans, except for MTW

- Also requesting to extend the maturity date to October 4, 2052, and payable through cash flow

Permanent debt at conversion may be lower than originally underwritten at initial closing

- Due to delays in converting subsidy programs, high operating expenses, and an increase in insurance to meet Freddie Mac requirements





Questions?



OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

**BOARD OF COMMISSIONERS
Regular Board Meeting**

**RESOLUTION 6906, AUTHORIZING THE NOVA APARTMENTS TRANSACTION, INCLUDING
AUTHORIZING THE SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE
THE RESOLUTION 26FAC-03-03 AUTHORIZING ITS PARTICIPATION IN THE NOVA
APARTMENTS TRANSACTION**

Signed by:


Michael Reyes
President and CEO

Timothy E. Alcott
Executive Vice President of Development
and General Counsel

REQUESTED ACTION:

Consideration and approval regarding Resolution 6906, authorizing the Nova Apartments transaction, including authorizing the San Antonio Housing Facility Corporation to approve the Resolution 26FAC-03-03 authorizing its participation in the Nova Apartments transaction.

SUMMARY:

Today, we are seeking authority to undertake the Nova Apartments transaction, including the ownership and operation of a multifamily residential apartment community in collaboration with Ascendant Capital Partners LP and/or its affiliates (the “Developer”). The project is located at approximately 14200 Vance Jackson Road, San Antonio, Bexar County, Texas 78249. The project will consist of approximately 412 multifamily housing units which will have the following affordability: 37.5% of the units will be set aside for individuals and families earning less than 80% of AMI, 10% of the units will be set aside for individuals and families earning 60% or less of AMI, 2.5% of the units will be set aside for individuals and families earning 50% or less of AMI, and the remaining 50% of the units will be market rate units.

The land will be acquired by the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio (“Opportunity Home”). Upon acquiring the land, Opportunity Home will immediately ground lease the land to 14200 Vance Jackson LLC, a Delaware limited liability company (the “Company”). San Antonio Housing Facility Corporation (“SAHFC”) would serve as the sole member of SAHFC Nova MM, LLC (the “Managing Member”), which would be the sole managing member of the Company.

The Company previously borrowed a loan for the project in the original aggregate principal amount of \$46,000,000 from SCREDIT MORTGAGE FUNDING SUB-3, LLC, a Delaware limited liability company (“Lender”), and the loan will be modified in connection with the transactions described herein, including the entrance into the Ground Lease and admission of Managing

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

Member as managing member of the Company. Equity contributions from an affiliate of the Developer may be used to finance the project's operations. No financing from Opportunity Home, SAHFC, or any affiliate thereof is needed. The Developer will provide all required guaranties for the financing.

The attached resolutions authorize SAHFC to enter the Nova Apartments transaction, and authorize Opportunity Home to (a) enter into and approve the Nova Apartments transaction, and (b) approve SAHFC to enter the Nova Apartments transaction. The Board is being asked to authorize all actions now deemed necessary to finance and acquire the project.

We are targeting a closing date prior to August 31, 2026.

STRATEGIC OUTCOMES:

Residents have a sufficient supply of affordable housing options.

Residents live in quality, affordable housing.

ATTACHMENTS:

Resolution 6906

Resolution 26FAC-03-03

Slides

**Opportunity Home San Antonio
Resolution 6906**

RESOLUTION 6906, AUTHORIZING THE NOVA APARTMENTS TRANSACTION, INCLUDING AUTHORIZING THE SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE THE RESOLUTION 26FAC-03-03 AUTHORIZING ITS PARTICIPATION IN THE NOVA APARTMENTS TRANSACTION

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio, a Texas municipal public housing authority and governmental entity (the “Authority”), has approved and created the San Antonio Housing Facility Corporation, a Texas nonstock, nonprofit corporation and instrumentality of the Authority (“SAHFC”); and

WHEREAS, SAHFC, on behalf of the Authority, is empowered to finance the costs of public facilities that will provide decent, safe, and sanitary housing for persons of low income in the City of San Antonio; and

WHEREAS, SAHFC desires to participate in the ownership and operation of a multifamily residential apartment community consisting of approximately 412 units and associated amenities to be known as Nova Apartments (the “Project”) and located on certain real property at approximately 14200 Vance Jackson Road, San Antonio, Texas 78249 (the “Land”) in collaboration with Ascendant Capital Partners LP and affiliates thereof (the “Developer”); and

WHEREAS, the operation of the Project is financed using equity and a loan from SCREDIT MORTGAGE FUNDING SUB-3, LLC, a Delaware limited liability company (collectively, the “Financing”); and

WHEREAS, SAHFC will serve as the sole member of SAHFC Nova MM, LLC, a Texas limited liability company (the “Managing Member”), which Managing Member will in turn serve as the managing member of 14200 Vance Jackson LLC, a Delaware limited liability company (the “Company”); and

WHEREAS, the Company will continue to own the Project improvements and the Authority will acquire the Land and enter into a long-term ground lease with the Company to allow for the Company’s ownership and operation of the Project on the Land; and

WHEREAS, the parties intend that, based on the contemplated transaction and participation by SAHFC and Authority, the Project and the Land will be fully exempt from property taxes pursuant to Section 392.005 of the Texas Local Government Code; and

WHEREAS, the Board has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above so that the Partnership may acquire and operate the Project.

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

- 1) Approves Resolution 6906, authorizing the Nova Apartments transaction, including authorizing the San Antonio Housing Facility Corporation to approve the Resolution 26FAC-03-03 authorizing its participation in the Nova Apartments transaction.
- 2) Approves Resolution 26FAC-03-03, authorizing the transactions for the Project and the participation of SAHFC or an affiliate thereof in the Project.
- 3) Authorizes Michael Reyes, as President and CEO, Timothy Alcott, as Executive Vice President of Development and General Counsel, or any other Officer or Commissioner of the Authority, to execute all necessary documents associated therewith.

If any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the validity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.

The recitals of this Resolution are hereby found to be true and are incorporated herein for all purposes.

This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes

President and CEO

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26FAC-03-03**

The undersigned officer of the San Antonio Housing Facility Corporation, a Texas nonprofit corporation created pursuant to the laws of the State of Texas ("SAHFC"), hereby certifies as follows:

1. In accordance with the bylaws of SAHFC, the Board of Directors of SAHFC (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 26FAC-03-03, AUTHORIZING THE NOVA APARTMENTS TRANSACTION, INCLUDING THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND AUTHORIZING THE LEASE OF LAND FOR THE TRANSACTION; AND AUTHORIZING THE ACQUISITION OF A MEMBERSHIP INTEREST IN SAHFC NOVA MM, LLC, THE MANAGING MEMBER OF 14200 VANCE JACKSON LLC; AND AUTHORIZING THE FINANCING FOR SUCH TRANSACTION; AND OTHER MATTERS IN CONNECTION THEREWITH

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the Bylaws of SAHFC.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
Secretary/Treasurer

**San Antonio Housing Facility Corporation
Resolution 26FAC-03-03**

RESOLUTION 26FAC-03-03, AUTHORIZING THE NOVA APARTMENTS TRANSACTION, INCLUDING THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND AUTHORIZING THE LEASE OF LAND FOR THE TRANSACTION; AND AUTHORIZING THE ACQUISITION OF THE MEMBERSHIP INTEREST IN SAHFC NOVA MM, LLC, THE MANAGING MEMBER OF 14200 VANCE JACKSON LLC; AND AUTHORIZING THE FINANCING FOR SUCH TRANSACTION; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio, a Texas municipal public housing authority and governmental entity (the “Authority”), has approved and created the San Antonio Housing Facility Corporation, a Texas nonstock, nonprofit corporation and instrumentality of the Authority (“SAHFC”); and

WHEREAS, SAHFC, on behalf of the Authority, is empowered to finance the costs of public facilities that will provide decent, safe, and sanitary housing for persons of low income in the City of San Antonio; and

WHEREAS, 14200 Vance Jackson LLC, a Delaware limited liability company (the “Company”), has been formed by affiliates of Ascendant Capital LLC (the “Developer”) to own and operate the Nova Apartments (the “Project”), a multifamily residential apartment community consisting of approximately 412 units and associated amenities located on real property at approximately 14200 Vance Jackson Road, San Antonio, Texas 78249 (the “Land”); and

WHEREAS, SAHFC Nova MM, LLC, a Texas limited liability company (the “Managing Member”), has been or will be formed to be admitted to and serve as the managing member of the Company; and

WHEREAS, SAHFC has agreed to serve as the sole member of the Managing Member; and

WHEREAS, the Authority shall acquire the Land and lease it to the Company pursuant to a Ground Lease (the “Ground Lease”), and the parties intend that the Project and the Land will be eligible for a full exemption from property taxes pursuant to Section 392.005 of the Texas Local Government Code; and

WHEREAS, in connection with the equity financing for the Project, the Managing Member desires to enter into certain equity documents with affiliates of the Developer (collectively, the “Equity Investor”) as non-managing members in the Company, including, without limitation, an amended and restated company agreement, closing certificates, and other related documents contemplated thereby (collectively, the “Equity Documents”); and

WHEREAS, the Company has borrowed a loan in the aggregate principal amount of \$46,000,000 (the “Loan”) from SCREDIT MORTGAGE FUNDING SUB-3, LLC, a Delaware limited liability company (“Lender”), and in connection with the Ground Lease and admission of Managing Member as managing member of the Company, the Company, the Managing Member, and/or SAHFC, as applicable will enter into, execute and deliver certain Loan modification

documents, including without limitation a deed of trust (which may include a fee joinder with respect to the Land), financing statements, various assignments and amendments, a ground lessor estoppel, and any other documents evidencing, securing, governing or necessary or convenient in connection with the Loan (collectively, the "Loan Documents"); and

WHEREAS, the Board of Directors of SAHFC (the "Board") has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio, Texas, for the various entities to enter into the transactions described above so that the Company may own and operate the Project; and

WHEREAS, this Board has reviewed the foregoing and determined that the action herein authorized is in furtherance of the public purposes of SAHFC.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of San Antonio Housing Facility Corporation, hereby:

Section 1. The Project and the various forms of financing contemplated for the Project, including but not limited to the Loan Documents, the Equity Documents, and the Ground Lease, are hereby authorized and approved.

Section 2. The lease of the Land, the acquisition of a membership interest in the Managing Member by SAHFC, and the acquisition of a membership interest in the Company by the Managing Member are approved and the President, any Vice President, the Secretary, the Treasurer, and any Assistant Secretary, or any of them acting alone, are hereby authorized to execute the documents required to be executed by SAHFC and/or the Managing Member and/or the Company in order to effectuate such transactions.

Section 3. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, are hereby authorized to execute any and all documentation required for the ownership and operation of the Project, including, but not limited to, the Ground Lease, the Loan Documents, the Equity Documents, and all other documents relating to the operation of the Project to which the Company and/or the Managing Member and/or SAHFC is a party.

Section 4. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, and, if required by the form of the document, the Secretary and any Assistant Secretary, or any of them, of SAHFC are authorized and directed to modify, execute and deliver any of the documents to be signed by or consented to by SAHFC, and any and all certificates and other instruments necessary to carry out the intent thereof and hereof. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them, are authorized to negotiate and approve such changes in, or additions to, the terms of any of the documents, including amendments, renewals, and extensions, as such Officers shall deem necessary or appropriate upon the advice of Counsel to SAHFC, and approval of the terms of any of the documents by such Officers and this Board shall be conclusively evidenced by the execution and delivery of such documents.

Section 5. The Officers of this Board, or any of them, are authorized to take any and all action necessary to carry out and consummate the transactions described in or contemplated

by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.

Section 6. The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

Section 7. All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

Section 8. If any provision of this Resolution or the application thereof to any person or circumstance shall be held to be invalid, the remainder of this Resolution and the application of such provision to other persons and circumstances shall nevertheless be valid, and the Board hereby declares that this Resolution would have been enacted without such invalid provision.

Section 9. This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

Section 10. This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes

Secretary/Treasurer

NOVA

Overview

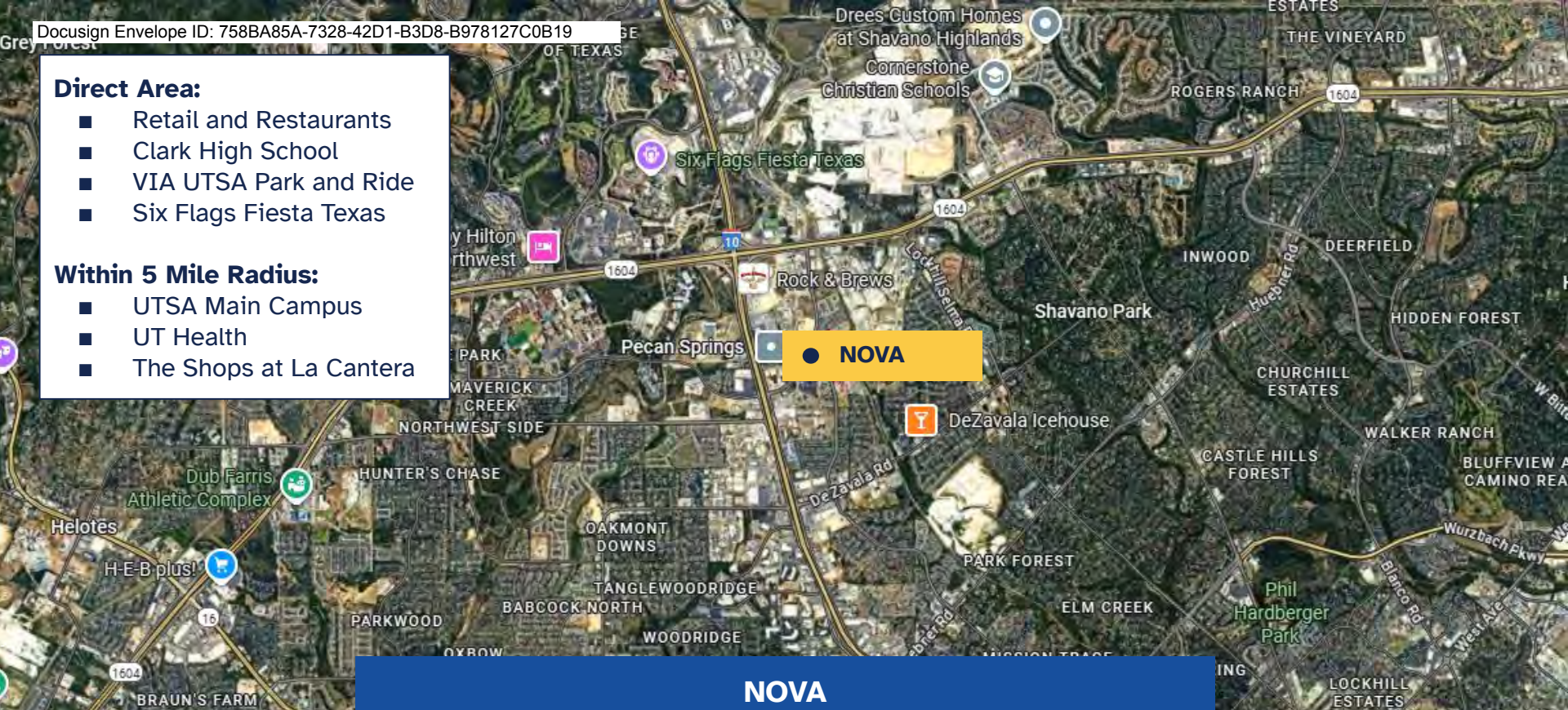
- Today we are seeking final approval of the Nova Apartments transaction, which includes the ownership and operation of a multifamily residential apartment.
- The housing providers for this transaction are Ascendant Capital Partners and Culver Investment Partners.
- This project previously received Board approval on February 4, 2026, to negotiate a Memorandum of Understanding (MOU). The MOU was executed on February 13, 2026.

Direct Area:

- Retail and Restaurants
- Clark High School
- VIA UTSA Park and Ride
- Six Flags Fiesta Texas

Within 5 Mile Radius:

- UTSA Main Campus
- UT Health
- The Shops at La Cantera



NOVA
14200 Vance Jackson, San Antonio, TX 78249

Project Data



City Council District 8

Northeast ISD

Total Units: 412

50% AMI ≥ 11 Units (2.5%)

60% AMI ≥ 41 Units (10.0%)

80% AMI ≥ 154 Units (37.5%)

Market Rate = 206 Units (50.0%)

Unit Mix

Studio - 72 units

1 Bedroom - 144 units

2 Bedroom - 160 units

3 Bedroom - 36 units

Non-Tax Credit Transaction

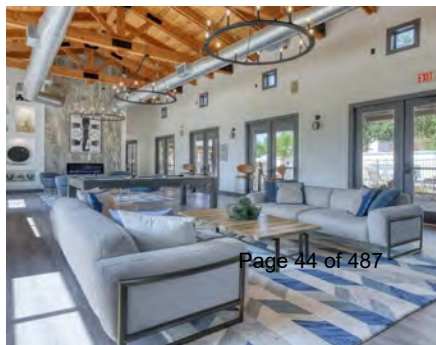
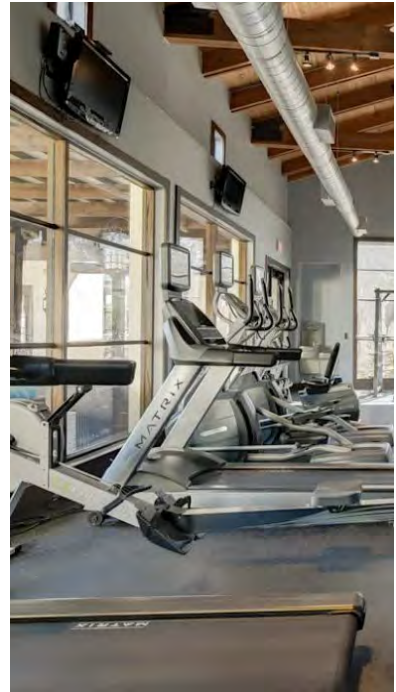
Amenities

Property Amenities

- Clubhouse
- Garage
- Business Center
- Fitness Center
- Dog Parks
- Two Pools
- Game Room
- BBQ/Picnic Areas

Unit Amenities

- Stainless Steel Appliances
- Gourmet Kitchen
- Vinyl Plank Flooring
- Washer/Dryer
- Walk-in Closet
- Patio/Balcony



PROFORMA BREAKDOWN (approximate)

Acquisition Cost	\$60,000,000
Soft Costs	\$598,401
Closing Costs	\$626,496
<i>Per Unit Cost</i>	<i>\$148,604</i>
Total Acquisition Cost	\$61,224,897

COMMUNITY AND RESIDENT IMPACT

Cross-Subsidy for Targeted Affordability

Proceeds from this project will help support very low-income residents by preserving, expanding and sustaining affordable housing and resident services, including:



Developing new affordable units serving **50% AMI** and below

Funding **budget gaps** in **affordable housing** projects

Preserving and **upgrading** existing Public Housing units

Acquiring existing properties to expand our affordable housing portfolio

Providing **supportive services** for residents

Operating an **Emergency Rental Assistance** program

Building **reserves** to maintain strong financial sustainability

HOUSING BENEFITS



Expands access to **workforce housing** in an area with limited affordable housing options

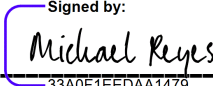
Strengthens **pathways to opportunities** through education, job training, recreation and community amenities

Improves access to **transportation** and **employment** opportunities

Questions?

**BOARD OF COMMISSIONERS
Regular Board Meeting**

RESOLUTION 6914, AUTHORIZING THE DURRINGTON RIDGE APARTMENTS TRANSACTION, INCLUDING AUTHORIZING THE SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE THE RESOLUTION 26FAC-03-02 AUTHORIZING ITS PARTICIPATION IN THE DURRINGTON RIDGE APARTMENTS TRANSACTION

Signed by:

33A0F1EEDAA1479...
Michael Reyes
President and CEO

Timothy E. Alcott
Executive Vice President of Development
and General Counsel

REQUESTED ACTION:

Consideration and approval regarding Resolution 6914, authorizing the Durrington Ridge Apartments transaction, including authorizing the San Antonio Housing Facility Corporation to approve the Resolution 26FAC-03-02 authorizing its participation in the Durrington Ridge Apartments transaction.

SUMMARY:

Today, we are seeking authority to undertake the Durrington Ridge Apartments transaction, including the ownership and operation of a multifamily residential apartment community in collaboration with Ascendant Capital Partners LP and/or affiliates thereof (the “Developer”). The project is located at approximately 21915 US-281, San Antonio, Bexar County, Texas 78258. The project will consist of approximately 398 multifamily housing units which will have the following affordability: 37.5% of the units will be set aside for individuals and families earning less than 80% of AMI, 10% of the units will be set aside for individuals and families earning 60% or less of AMI, 2.5% of the units will be set aside for individuals and families earning 50% or less of AMI, and the remaining 50% of the units will be market rate units.

The land will be acquired by the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio (“Opportunity Home”). Upon acquiring the land, Opportunity Home will immediately ground lease the land to 21915 US HWY 281 LLC, a Delaware limited liability company (the “Company”). San Antonio Housing Facility Corporation (“SAHFC”) would serve as the sole member of SAHFC Durrington Ridge MM, LLC (the “Managing Member”), which would be the sole managing member of the Company.

The Company previously borrowed a loan for the project in the original aggregate principal amount of \$58,183,000.00 from Walker & Dunlop, LLC, as servicer for Federal Home Loan Mortgage Corporation, and the loan will be modified in connection with the transactions

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

described herein, including the entrance into the Ground Lease and admission of Managing Member as managing member of the Company. Equity contributions from an affiliate of the Developer may be used to finance the operations of the project. No financing from Opportunity Home, SAHFC, or any affiliate thereof is needed. The Developer will provide all required guaranties for the financing.

The attached resolutions authorize SAHFC to enter the Durrington Ridge Apartments transaction, and authorize Opportunity Home to (a) enter into and approve the Durrington Ridge Apartments transaction, and (b) approve SAHFC to enter the Durrington Ridge Apartments transaction. The Board is being asked to authorize all actions now understood to be necessary to finance and acquire the project.

We are targeting a closing date prior to August 31, 2026.

STRATEGIC OUTCOMES:

Residents have a sufficient supply of affordable housing options.

Residents live in quality, affordable housing.

ATTACHMENTS:

Resolution 6914

Resolution 26FAC-03-02

Slides

**Opportunity Home San Antonio
Resolution 6914**

RESOLUTION 6914, AUTHORIZING THE DURRINGTON RIDGE APARTMENTS TRANSACTION, INCLUDING AUTHORIZING THE SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE THE RESOLUTION 26FAC-03-02 AUTHORIZING ITS PARTICIPATION IN THE DURRINGTON RIDGE APARTMENTS TRANSACTION

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio, a Texas municipal public housing authority and governmental entity (the “Authority”) has approved and created the San Antonio Housing Facility Corporation, a Texas nonstock, nonprofit corporation and instrumentality of the Authority (“SAHFC”); and

WHEREAS, SAHFC, on behalf of the Authority, is empowered to finance the costs of public facilities that will provide decent, safe, and sanitary housing for persons of low income in the City of San Antonio; and

WHEREAS, SAHFC desires to participate in the ownership and operation of a multifamily residential apartment community consisting of approximately 398 units and associated amenities to be known as Durrington Ridge Apartments (the “Project”) and located on certain real property at 21915 US-281, San Antonio, Texas 78258 (the “Land”) in collaboration with Ascendant Capital Partners LP and affiliates thereof (the “Developer”); and

WHEREAS, the operation of the Project is financed using equity and a loan from Walker & Dunlop, LLC as servicer, which has been collaterally assigned to the Federal Home Loan Mortgage Corporation (collectively, the “Financing”); and

WHEREAS, SAHFC will serve as the sole member of SAHFC Durrington Ridge MM, LLC, a Texas limited liability company (the “Managing Member”), which Managing Member will in turn serve as the managing member of 21915 US HWY 281 LLC, a Delaware limited liability company (the “Company”); and

WHEREAS, the Company will continue to own the Project improvements and the Authority will acquire the Land and enter into a long-term ground lease with the Company to allow for the Company’s ownership and operation of the Project on the Land; and

WHEREAS, the parties intend that, based on the contemplated transaction and participation by SAHFC and Authority, the Project and the Land will be fully exempt from property taxes pursuant to Section 392.005 of the Texas Local Government Code; and

WHEREAS, the Board has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above so that the Partnership may acquire and operate the Project;

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

- 1) Approves Resolution 6914, authorizing the Durrington Ridge Apartments transaction, including authorizing the San Antonio Housing Facility Corporation to approve the Resolution 26FAC-03-02 authorizing its participation in the Durrington Ridge Apartments transaction.
- 2) Approves Resolution 26FAC-03-02, authorizing the transactions for the Project and the participation of SAHFC or an affiliate thereof in the Project.
- 3) Authorizes Michael Reyes, as President and CEO, Timothy Alcott, as Executive Vice President of Development and General Counsel, or any other Officer or Commissioner of the Authority, to execute all necessary documents associated therewith.

If any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the validity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.

The recitals of this Resolution are hereby found to be true and are incorporated herein for all purposes.

This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes

President and CEO

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26FAC-03-02**

The undersigned officer of the San Antonio Housing Facility Corporation, a Texas nonprofit corporation created pursuant to the laws of the State of Texas ("SAHFC"), hereby certifies as follows:

1. In accordance with the bylaws of SAHFC, the Board of Directors of SAHFC (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

**RESOLUTION 26FAC-03-02, AUTHORIZING THE DURRINGTON RIDGE
APARTMENTS TRANSACTION, INCLUDING THE EXECUTION OF ALL
DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND
AUTHORIZING THE LEASE OF LAND FOR THE TRANSACTION; AND
AUTHORIZING THE ACQUISITION OF A MEMBERSHIP INTEREST IN SAHFC
DURRINGTON RIDGE MM, LLC, THE MANAGING MEMBER OF 21915 US HWY
281 LLC; AND AUTHORIZING THE FINANCING FOR SUCH TRANSACTION;
AND OTHER MATTERS IN CONNECTION THEREWITH**

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the Bylaws of SAHFC.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
Secretary/Treasurer

**San Antonio Housing Facility Corporation
Resolution 26FAC-03-02**

RESOLUTION 26FAC-03-02, AUTHORIZING THE DURRINGTON RIDGE APARTMENTS TRANSACTION, INCLUDING THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND AUTHORIZING THE LEASE OF LAND FOR THE TRANSACTION; AND AUTHORIZING THE ACQUISITION OF THE MEMBERSHIP INTEREST IN SAHFC DURRINGTON RIDGE MM, LLC, THE MANAGING MEMBER OF 21915 US HWY 281 LLC; AND AUTHORIZING THE FINANCING FOR SUCH TRANSACTION; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio, a Texas municipal public housing authority and governmental entity (the “Authority”), has approved and created the San Antonio Housing Facility Corporation, a Texas nonstock, nonprofit corporation and instrumentality of the Authority (“SAHFC”); and

WHEREAS, SAHFC, on behalf of the Authority, is empowered to finance the costs of public facilities that will provide decent, safe, and sanitary housing for persons of low income in the City of San Antonio; and

WHEREAS, 21915 US HWY 281 LLC, a Delaware limited liability company (the “Company”), has been formed by affiliates of Ascendant Capital LLC (the “Developer”) to own and operate the Durrington Ridge Apartments (the “Project”), a multifamily residential apartment community consisting of approximately 398 units and associated amenities located on real property at approximately 21915 US-281, San Antonio, Texas 78258 (the “Land”); and

WHEREAS, SAHFC Durrington Ridge MM, LLC, a Texas limited liability company (the “Managing Member”), has been or will be formed to be admitted to and serve as the managing member of the Company; and

WHEREAS, SAHFC has agreed to serve as the sole member of the Managing Member; and

WHEREAS, the Authority shall acquire the Land and lease it to the Company pursuant to a Ground Lease (the “Ground Lease”), and the parties intend that the Project and the Land will be eligible for a full exemption from property taxes pursuant to Section 392.005 of the Texas Local Government Code; and

WHEREAS, in connection with the equity financing for the Project, the Managing Member desires to enter into certain equity documents with affiliates of the Developer (collectively, the “Equity Investor”) as non-managing members in the Company, including, without limitation, an amended and restated company agreement, closing certificates, and other related documents contemplated thereby (collectively, the “Equity Documents”); and

WHEREAS, the Company has borrowed a loan in the aggregate principal amount of \$58,183,000 (the “Loan”) from Walker & Dunlop, LLC (“Lender”), as servicer for Federal Home Loan Mortgage Corporation (“Freddie Mac”) and, in connection with the Ground Lease and admission of Managing Member as managing member of the Company, the Company, the Managing Member,

and/or SAHFC, as applicable will enter into, execute and deliver certain Loan modification documents, including without limitation a deed of trust (which may include a fee joinder with respect to the Land), financing statements, various assignments and amendments, a ground lessor estoppel, and any other documents evidencing, securing, governing or necessary or convenient in connection with the Loan (collectively, the "Loan Documents"); and

WHEREAS, the Board of Directors of SAHFC (the "Board") has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio, Texas, for the various entities to enter into the transactions described above so that the Company may own and operate the Project; and

WHEREAS, this Board has reviewed the foregoing and determined that the action herein authorized is in furtherance of the public purposes of SAHFC.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of San Antonio Housing Facility Corporation, hereby:

Section 1. The Project and the various forms of financing contemplated for the Project, including but not limited to the Loan Documents, the Equity Documents, and the Ground Lease, are hereby authorized and approved.

Section 2. The lease of the Land, the acquisition of a membership interest in the Managing Member by SAHFC, and the acquisition of a membership interest in the Company by the Managing Member are approved and the President, any Vice President, the Secretary, the Treasurer, and any Assistant Secretary, or any of them acting alone, are hereby authorized to execute the documents required to be executed by SAHFC and/or the Managing Member and/or the Company in order to effectuate such transactions.

Section 3. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, are hereby authorized to execute any and all documentation required for the ownership and operation of the Project, including, but not limited to, the Ground Lease, the Loan Documents, the Equity Documents, and all other documents relating to the operation of the Project to which the Company and/or the Managing Member and/or SAHFC is a party.

Section 4. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them acting alone, and, if required by the form of the document, the Secretary and any Assistant Secretary, or any of them, of SAHFC are authorized and directed to modify, execute and deliver any of the documents to be signed by or consented to by SAHFC, and any and all certificates and other instruments necessary to carry out the intent thereof and hereof. The President, any Vice President, the Secretary, the Treasurer, any Assistant Secretary, or any of them, are authorized to negotiate and approve such changes in, or additions to, the terms of any of the documents, including amendments, renewals, and extensions, as such Officers shall deem necessary or appropriate upon the advice of Counsel to SAHFC, and approval of the terms of any of the documents by such Officers and this Board shall be conclusively evidenced by the execution and delivery of such documents.

Section 5. The Officers of this Board, or any of them, are authorized to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.

Section 6. The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

Section 7. All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

Section 8. If any provision of this Resolution or the application thereof to any person or circumstance shall be held to be invalid, the remainder of this Resolution and the application of such provision to other persons and circumstances shall nevertheless be valid, and the Board hereby declares that this Resolution would have been enacted without such invalid provision.

Section 9. This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

Section 10. This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes

Secretary/Treasurer

Durrington Ridge

Overview

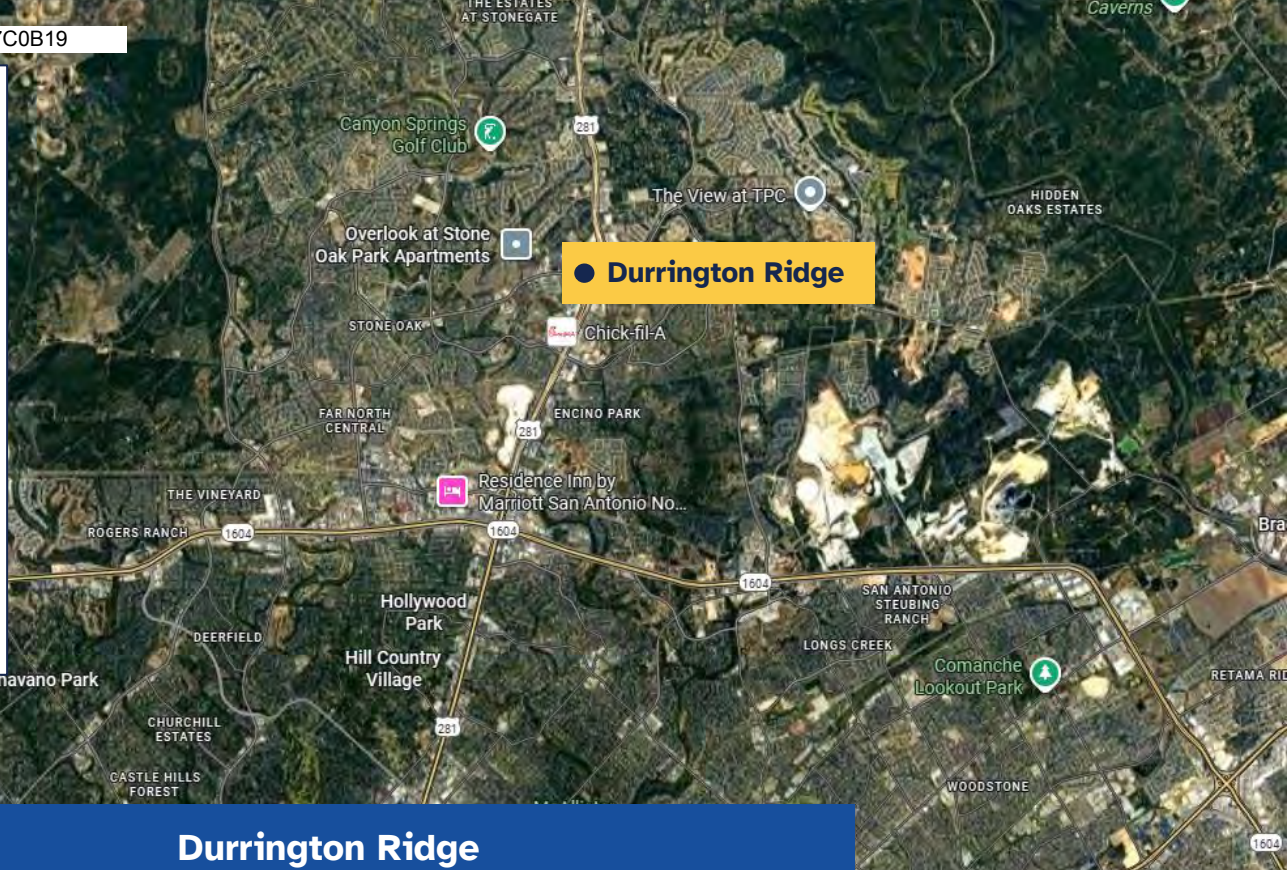
- Today we are seeking final approval of the Durrington Ridge transaction which includes the ownership and operation of a multifamily residential apartment.
- The housing providers for this transaction are Ascendant Capital Partners and Culver Investment Partners.
- This project previously received Board approval on February 4, 2026 to negotiate a Memorandum of Understanding (MOU). The MOU was executed on February 13, 2026.

Direct Area:

- Retail and Restaurants
- Johnson High School
- Stone Oak Park
- VIA Stone Oak Park and Ride
- iHeartMedia Offices

Within 5 Mile Radius:

- Methodist Hospital-Stone Oak
- JP Morgan Chase San Antonio Corporate Center



Durrington Ridge

21915 US-281, San Antonio, TX 78258

Amenities

Property Amenities

- Clubhouse
- Garage
- Business Center
- Dog Park
- Lap Pool
- Fitness Center
- Elevator

Unit Amenities

- Stainless Steel Appliances
- Gourmet Kitchen
- Vinyl Plank Flooring
- Washer/Dryer
- Walk-in Closet
- Patio/Balcony



Project Data



City Council District 9

Northeast ISD

Total Units: 398

50% AMI ≥ 10 Units (2.5%)

60% AMI ≥ 39 Units (10.0%)

80% AMI ≥ 150 Units (37.5%)

Market Rate = 199 Units (50.0%)

Unit Mix

1 bedroom - 234 Units

2 bedroom - 146 Units

3 bedroom - 18 Units

Non-Tax Credit Transaction

PROFORMA BREAKDOWN (approximate)

Acquisition Cost	\$80,000,000
Soft Costs	\$725,901
Closing Costs	\$687,500
<i>Per Unit Cost</i>	<i>\$204,556</i>
Total Acquisition Cost	\$81,413,401

COMMUNITY AND RESIDENT IMPACT

Cross-Subsidy for Targeted Affordability

Proceeds from this project will help support very low-income residents by preserving, expanding and sustaining affordable housing and resident services, including:



Developing new affordable units serving **50% AMI** and below

Funding **budget gaps** in **affordable housing** projects

Preserving and **upgrading** existing Public Housing units

Acquiring existing properties to expand our affordable housing portfolio

Providing **supportive services** for residents

Operating an **Emergency Rental Assistance** program

Building **reserves** to maintain strong financial sustainability

HOUSING BENEFITS



Expands access to **workforce housing** in an area with limited affordable housing options

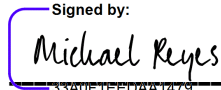
Strengthens **pathways to opportunities** through education, job training, recreation and community amenities

Improves access to **transportation** and **employment** opportunities

Questions?

**BOARD OF COMMISSIONERS
Regular Board Meeting**

**RESOLUTION 6909, CERTIFYING THAT OPPORTUNITY HOME'S INVESTMENT POLICY
AND INVESTMENT STRATEGIES HAVE BEEN REVIEWED IN ACCORDANCE WITH THE
REQUIREMENTS SET FORTH IN SECTION 2256.005 (E) OF THE TEXAS PUBLIC FUNDS
INVESTMENT ACT**

Signed by:


Michael Reyes
President and CEO

Aaron Sladek
Senior Director, Finance and Accounting

REQUESTED ACTION:

Consideration and approval regarding Resolution 6909, certifying that Opportunity Home's Investment Policy and investment strategies have been reviewed in accordance with the requirements set forth in Section 2256.005 (E) of the Texas Public Funds Investment Act.

SUMMARY:

Section 2256.005 (e) of the Texas Public Funds Investment Act requires the governing body of each covered entity review its Investment Policy and investment strategies not less than annually and adopt a written instrument by rule, order, ordinance, or resolution stating such.

The Investment Policy denotes the allowed investment activities, which must conform to all federal, state, and local statutes governing the investment of public and non-public funds. The policy contains relevant information to guide responsible personnel regarding authorized investment activities.

There are no proposed changes to the Investment Policy at this time.

STRATEGIC OUTCOME:

Supports all strategic outcomes.

ATTACHMENTS:

Resolution 6909
2026 Investment Policy

**CERTIFICATE FOR RESOLUTION
RESOLUTION 6909**

The undersigned officer of the Housing Authority of the City of San Antonio, Texas, a Texas housing authority created pursuant to the laws of the State of Texas ("Opportunity Home"), hereby certifies as follows:

1. In accordance with Chapter 551, Texas Government Code, as amended (the "Open Meetings Act"), and the bylaws of Opportunity Home San Antonio, the Board of Commissioners of Opportunity Home San Antonio (the "Board") held a meeting on March 4, 2026, (the "Meeting") of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

**RESOLUTION 6909, CERTIFYING THAT OPPORTUNITY HOME'S
INVESTMENT POLICY AND INVESTMENT STRATEGIES HAVE BEEN
REVIEWED IN ACCORDANCE WITH THE REQUIREMENTS SET FORTH IN
SECTION 2256.005 (E) OF THE TEXAS PUBLIC FUNDS INVESTMENT ACT**

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Open Meetings Act and the Bylaws of Opportunity Home San Antonio.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
President and CEO

**Opportunity Home San Antonio
Resolution 6909**

RESOLUTION 6909, CERTIFYING THAT OPPORTUNITY HOME'S INVESTMENT POLICY AND INVESTMENT STRATEGIES HAVE BEEN REVIEWED IN ACCORDANCE WITH THE REQUIREMENTS SET FORTH IN SECTION 2256.005 (E) OF THE TEXAS PUBLIC FUNDS INVESTMENT ACT

WHEREAS, the State of Texas has passed legislation requiring written Investment Policies for all public agencies; and

WHEREAS, the State requires the governing body of an investing entity to review its Investment Policy and investment strategies not less than annually and adopt a resolution stating such; and

WHEREAS, the staff of Opportunity Home has previously prepared the Investment Policy to meet the requirements of the State of Texas Law; and

WHEREAS, there are no proposed changes to the Investment Policy at this time.

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

- 1) Approves Resolution 6909, certifying that Opportunity Home's Investment Policy and investment strategies have been reviewed in accordance with the requirements set forth in Section 2256.005 (E) of the Texas Public Funds Investment Act.
- 2) Authorizes the President and CEO, or their designee, to execute all necessary documents and extensions.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz
Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes
President and CEO

INVESTMENT POLICY

March 4, 2026

1.0 POLICY:

It is the policy of the Housing Authority of the City of San Antonio, Texas (known as “Opportunity Home”), to invest all funds in a manner that provides the highest investment return with the maximum security, while ensuring sufficient liquidity to meet the daily cash flow demands of Opportunity Home. Investment activities must conform to all federal, state, and local statutes governing the investment of public and non-public funds.

2.0 SCOPE:

This investment policy applies to all financial assets of Opportunity Home and related entities. These funds are accounted for in Opportunity Home’s annual audit reports and include:

- 2.1 Operating Funds and Reserves for Public Housing, Section 8, and all programs
- 2.2 Development Reserves, Bond Proceeds, and Escrow Accounts
- 2.3 Any newly acquired or special funds
- 2.4 Non-Profit and Partnership Funds

3.0 OBJECTIVE:

As required by the Act, the investment of funds shall be governed by the following investment objectives, in order of preference:

- 3.1 Preservation and safety of principal: Investment decisions of Opportunity Home shall be undertaken in a manner that seeks to ensure the preservation and safety of capital in the overall portfolio. To obtain this goal, adequate diversification is required to ensure that potential losses on individual investments do not exceed the income generated from the remainder of the portfolio. There shall be a requirement for settlement of all transactions, except investment pool funds and mutual funds, on a delivery versus payment basis.
- 3.2 Liquidity: The investment portfolio will remain sufficiently liquid to enable Opportunity Home to meet all operating requirements that might be reasonably anticipated. Investment in securities with an active secondary market are preferred investments.

- 3.3 Yield and Return on Investment: Opportunity Home's investment portfolio shall be designed with the objective of attaining a rate of return throughout budgetary and economic cycles, commensurate with Opportunity Home's investment risk constraints and cash flow characteristics of the portfolio.
- 3.4 Legal Limitations: Direct specific investment parameters for the investment of public funds in Texas are found in the Public Funds Investment Act, Chapter 2256, Texas Government Code, and the U. S. Department of Housing and Urban Development Public and Indian Housing Notice 95-27 issued May 11, 1995.
- 3.5 Administrative Cost: In choosing an investment, Opportunity Home shall consider the administrative work involved, particularly with regard to investments of short duration.

4.0 PRUDENCE:

The standard of prudence to be used in the investment function shall be the "prudent person" standard and shall be applied in the context of managing the overall portfolio. Prudence shall be measured by considering the investment of all funds or funds under the entity's control over which the officer had responsibility, rather than a consideration as to the prudence of a single investment.

This standard states: "Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the expected income to be derived." The investment officer and those delegated with investment authority under this policy, when acting in accordance with the written procedures and this policy in accord with the Prudent Person Rule, shall be relieved of personal responsibility and liability in the management of the portfolio, provided that deviations from expectations for a specific security's credit risk or market price change or portfolio shifts are reported in a timely manner and that appropriate action is taken to control adverse market effects.

5.0 DELEGATION OF AUTHORITY:

The Board of Commissioners of Opportunity Home retains the ultimate responsibility as fiduciaries over the assets of the organization. The Board hereby delegates to the CEO and the CEO's designated staff the day-to-day responsibility of managing Opportunity Home's investment activities. The CEO will report the investment activities to the Board of Commissioners on at least a quarterly basis as required by the Public Funds Investment Act.

The CEO, with assistance from the CEO's designated staff, will establish the system of procedures and controls to regulate the investment activities. No officer or designee may engage in an investment transaction except as provided under the terms of this policy and the procedures established and approved by the President and CEO. The CEO designates

the Chief Financial Officer as responsible for considering the quality and capability of staff, investment advisors, and consultants involved in investment management and procedures. The Chief Financial Officer will also oversee all investment activities and ensure that appropriate internal controls are in place and being followed.

The CEO also designates the Chief Financial Officer as the Investment Officer of Opportunity Home to be responsible for the day-to-day operating decisions related to investment decisions and activities. In addition, the Investment Officer shall be responsible for all transactions undertaken and, together with the CEO, shall establish a system of procedures and controls to regulate the activities of subordinate officials and staff. The CEO and Chief Financial Officer shall be authorized to make investment decisions and place investment orders. All participants in the investment process shall act responsibly as custodians of the public trust.

6.0 ETHICS AND CONFLICTS OF INTEREST:

Officers, employees, board members, and investment officials involved in the investment process shall refrain from personal business activity that could conflict, or could reasonably be perceived as a conflict, with the proper execution of the investment program, or which could impair their ability to make impartial investment decisions. Officers, employees, board members, and investment officials shall disclose to the President and CEO, in writing, any material financial interests in financial institutions that conduct business with Opportunity Home. Officers, employees, board members, and investment officials shall further disclose any large personal financial investment positions that could be related to the investment activities of Opportunity Home, particularly with regard to the time of purchases and sales of investments. All Federal, State of Texas, and Opportunity Home Ethics Policies shall be strictly followed.

7.0 AUTHORIZED FINANCIAL DEALERS AND INSTITUTIONS:

The Investment Officer shall maintain a list of all financial institutions authorized to provide investment services for Opportunity Home.

- 7.1 All financial institutions and broker/dealers who desire to become qualified bidders for investment transactions must supply the Investment Officer with annual financial statements and certification in writing that the financial institution or the broker/dealer has read and will follow all Federal and State of Texas laws and regulations regarding investments made by Opportunity Home.
- 7.2 An annual review of the financial statements will be completed by the Investment Officer.
- 7.3 A current audited financial statement is required to be on file for each financial institution and broker/dealer with which Opportunity Home transacts business.

- 7.4 The board or designated investment committee of Opportunity Home shall, at least annually, review, revise, and adopt a list of qualified brokers that are authorized to engage in investment transactions with Opportunity Home.

8.0 AUTHORIZED AND SUITABLE INVESTMENTS:

- 8.1 HUD Funds: Opportunity Home is required to invest HUD-sourced funds in investments approved by the U.S. Department of Housing and Urban Development. These investments must be fully collateralized. ATTACHMENT A is applicable to HUD funds and contains a listing and description of approved investments.
- 8.2 Non-HUD Funds: Funds in excess of HUD funds, unrestricted funds, reserves, partnership funds, bond proceeds, foundation funds, and other funds are not subject to ATTACHMENT A; however, these funds shall be invested in accordance with the Public Funds Investment Act.

9.0 COLLATERALIZATION:

Full collateralization is required for all of Opportunity Home's investments. In order to protect Opportunity Home's assets, collateralization of one hundred percent (100%) is required at all times. All collateral shall conform to those investment instruments listed in ATTACHMENT A of the Public Funds Investment Act.

Collateral will always be held by an independent third party with whom the financial institution or broker/dealer has a current custodial agreement. A clearly marked evidence of ownership or safekeeping receipt must be available to Opportunity Home.

Collateral substitution may be allowed when the substituted collateral is on the approved list of investments listed in ATTACHMENT A or the Public Funds Investment Act.

10.0 DIVERSIFICATION:

Opportunity Home will diversify its investments by security type and institution. With the exception of U.S. Treasury securities and authorized investment pools, no more than 50% of Opportunity Home's total investment portfolio will be invested in a single security type or in securities issued by a single financial institution or broker/dealer.

11.0 MAXIMUM MATURITIES:

- 11.1 Operating Funds: To the extent possible, Opportunity Home will attempt to match its investments with anticipated cash flow requirements. Unless matched to a specific cash flow, Opportunity Home will not directly invest in securities maturing more than three years (3) from the date of purchase. This maximum maturity policy applies to all operating funds.

11.2 Non-operating or excess funds: Funds in excess of operating needs, unrestricted funds, foundation funds, bond proceeds, reserves, escrow funds, and other funds not required for operations may be held in securities without regard to the three-year (3) limitation referenced in Section 11.1. The Investment Officer shall ensure that sufficient liquidity exists at all times to meet operating commitments.

12.0 INTERNAL CONTROL:

The Investment Officer shall establish an annual process of independent review as part of the annual audit. This review will provide internal control by assuring compliance with policies and procedures.

13.0 PERFORMANCE STANDARDS AND REPORTING:

As required by Section 2256 of the Public Funds Act, at least quarterly, the Investment Officer or designee will prepare an investment report for Opportunity Home's Board of Commissioners. The report shall contain the name of the financial institution or broker/dealer holding the investment, the investment position, the cost of the investment, the fair market value, the purchase date, the maturity date, and any interest accrued. Investment performance will be measured by standards set by the U.S. Department of Housing and Urban Development.

14.0 INVESTMENT POLICY ADOPTION:

Opportunity Home's investment policy shall be adopted by resolution of the Board of Commissioners. The policy shall be reviewed on a periodic basis and revised by the Investment Officer as necessary. It is the intent of Opportunity Home that if any changes to federal or State of Texas laws affect this policy, the new law or change becomes effective as stated, and this policy is automatically conformed to existing law.

15.0 EXEMPTION:

Any investment currently held that does not meet the guidelines of this policy shall be exempted from the requirements contained herein. At maturity or liquidation, such funds shall be reinvested only as provided by this policy.

ATTACHMENT A

INVESTMENT INSTRUMENTS APPROVED BY HUD

1. DIRECT OBLIGATION OF THE FEDERAL GOVERNMENT BACKED BY THE FULL FAITH AND CREDIT OF THE UNITED STATES
 - a. U.S. Treasury Bills
 - b. U. S. Treasury Notes and Bonds
 - (1) U.S. Treasury Notes
 - (2) U.S. Treasury Bonds
2. OBLIGATIONS OF FEDERAL GOVERNMENT AGENCIES
 - a. Federal Financing Bank (FFB)
 - b. Government National Mortgage Association (GNMA). Mortgage-Backed Securities (GNMA I and GNMA II)
 - c. GNMA Participation Certifies
 - d. Maritime Administration Merchant Marine Bonds, Notes, and Obligations
 - e. Small Business Administration (SBA). Small Business Investment Corporation (SBIC) Debentures
 - f. Tennessee Valley Authority (TVA) Power Bonds and Notes

3. SECURITIES OF GOVERNMENT-SPONSORED AGENCIES

- a. Farm Credit Consolidated System-Wide Discount Notes
- b. Federal Farm Credit Banks Consolidated System-Wide Bonds
- c. Federal Home Loan Banks Consolidated Obligations

These securities are the secured joint and several obligations of the Federal Home Loan Banks, comprised of:

 - (1) Bonds
 - (2) Notes
 - (3) Discount Notes
- d. FHLMC Mortgage Participation Certificates (PC) (Guaranteed)
- e. FHLMC Collateralized Mortgage Obligations (CMOs)
- f. Federal National Mortgage Association (FNMA) Debentures
- g. FNMA Notes
- h. FNMA Short-Term Discount Notes
- i. FNMA Capital Debentures
- j. Student Loan Marketing Associations (SLMA) Obligations

SLMA issues obligations that comprise guaranteed student loans as follows:

- (1) Floating Rate and Master Notes

(2) The Series E and F Floating Rate Notes

(3) Zero-Coupon Notes

4. DEMAND AND SAVINGS DEPOSITS

5. MONEY-MARKET DEPOSIT ACCOUNT

6. MUNICIPAL DEPOSITORY FUND

7. SUPER NOW ACCOUNTS

8. CERTIFICATES OF DEPOSIT

- a. Certificates of Deposit are permitted at depository institutions that are insured by an agency of the Federal Government. Caution must be exercised for certificates exceeding the \$250,000 insurance limit or when the term is longer than 30-90 days. The new FDIC limit of \$250,000 is in effect through December 2013. Although the certificates' rate of return may be attractive for larger amounts and longer terms, U. S. Treasury Securities offer superior safety and liquidity for the same amounts and terms. Certificates shall be in the HA's name. In addition, a General Depository Agreement must be executed by each financial institution that issues a Certificate of Deposit.
- b. Certificate amounts above \$250,000 are permitted, provided that the excess is 100 percent collateralized by clearly identified (not pooled) U.S. Government securities. Possession of the collateral securities and a continuous perfected security interest may be the only sure protection against loss in case of bank failure.
- c. Brokered deposits should be avoided because it is impossible to get \$100,000 federal insurance on a number of deposits placed by brokers.

9. REPURCHASE AGREEMENTS

Repurchase (repos) agreements for a term not to exceed 30 days may be entered into with a Federally insured depository institution to purchase and sale of securities identified under subparagraphs b, c, and d. A repurchase agreement is an agreement negotiated with a bank, usually for a short period (1 to 7 days), wherein securities approved for investment are purchased from that bank at a stated price, with the bank agreeing to

repurchase them on a specified date for a specified amount. The minimum may vary, although it is usually \$100,000. There are three main types: (1) fixed term, where both parties are bound to the negotiated time period; (2) demand, where the agreement stays in effect until terminated by either party, and (3) day-to-day, where daily renewal is by mutual consent and 24-hour notice is required for termination. The HA should review existing and future repos for compliance with the following certifications. Prior approval by HUD is not necessary; however, the repo seller, depository, or its agency must provide a written certification to HUD, Assistant Secretary for Public and Indian Housing (Office of Finance and Budget), the Area Office, and the HA.

- a. that the depository's repo program complies with applicable Federal and State statutes and regulations, and that the program does not involve sales or loans of Federal securities by securities dealers that are not regulated or that report to the Federal Reserve Board;
- b. that the depository owns the underlying Federal securities (approved for repurchase under HUD guidelines) when the repo interest is sold, and that the value of the securities is equal to or greater than the amount the HA pays for the repo;
- c. that the HA has possession of the securities (or the HA will take possession of the securities on behalf of the HA) as a bailee (evidenced by a safe keeping receipt and a written bailment for hire contract), from the time the repo interest is sold to the HA and will be (or is expected to be) maintained for the full term of the repo;
- d. that the repo agreement and any related documents identify specific Federal securities related to the specific repo purchased by the HA;
- e. that the repo interest does not represent any interest in a pool or fund of Federal securities for which registration under the Investment Company Act of 1940 may be required;
- f. that the HA will have a continuous perfected security interest in the underlying Federal securities under State or Federal law for the full term of the repo (disclosing the method by which perfection has or will be accomplished, i.e., by possession, filing, registration of book-entry securities) and/or Federal preemption of State law by Federal regulation;
- g. that the depository or a reporting dealer selling the repo has not received any adverse financial report from a credit reporting agency, State, or Federal regulatory agency; and
- h. that the depository will not substitute other securities as collateral, except to increase the value of the repo security to match the repo's purchase price.

10. SWEEP ACCOUNTS

11. SEPARATE TRADING OF REGISTERED INTEREST AND PRINCIPAL OF SECURITIES (STRIPS)

12. MUTUAL FUNDS

A Mutual Fund (Fund) is an investment company that makes investments on behalf of individuals and institutions. The Fund pools the money of the investors and buys various securities that are consistent with the Fund's objective.

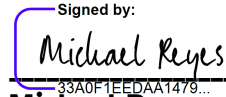
- a. Mutual Fund Criteria: The Fund shall be organized as a no-load, open-end, diversified management company, and its shares shall be registered under the Securities Act of 1993. The Fund shall be under the control of the Securities Exchange Act of 1934, Investment Adviser Act of 1940, and the Investment Company Act of 1940. The investment objective of the Fund shall be to obtain as much income as possible consistent with the preservation, conservation, and stability of capital. The mutual fund objective cannot be changed without the prior approval of fund shareholders.
- b. The securities purchased by the Fund shall be on the HUD-approved list of investment securities. The fund will not engage in options or financial futures. The HA shall limit the amount of funds invested in the Fund to no more than 20 percent of the HA's available investment funds. The Fund shall disclose clearly the basis of earnings and how they are distributed. The HA shall obtain a statement of potential default and risk. The HA's invested funds shall be accessible to the HA daily. It shall be demonstrated that any limitations on withdrawals will not impair the HA's day-to-day cash management needs.
- c. The management fee shall be fixed at a reasonable amount. The Fund shall disclose the relationships of the investment advisor, manager, trustee, custodian, and transfer agent. The Fund shall clearly state all services (such as wire transfers and check writing privileges) and charges.
- d. Investment in the Fund shall be authorized by a Board Resolution. A certified copy of the resolution shall accompany the initial application for the Fund.

13. EFFECT OF LOSS OF REQUIRED RATING

An investment that requires a minimum rating under this section does not qualify as an authorized investment during the period the investment does not have the minimum rating. Management has the authority to waive the minimum portfolio credit quality if the quality decline is due to a downgrade or default of U.S. Government securities. Opportunity Home shall take all prudent measures that are consistent with its investment policy to liquidate an investment that does not have the minimum rating.

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026****BOARD OF COMMISSIONERS
Regular Board Meeting****RESOLUTION 6910, ACCEPTING THE INDEPENDENT AUDITOR'S REPORT FOR THE YEAR
ENDED JUNE 30, 2025**

Signed by:

**Michael Reyes**
President and CEO
Aaron Sladek
Senior Director, Finance and Accounting**REQUESTED ACTION:**

Consideration and approval regarding Resolution 6910, accepting the Independent Auditor's Report for the year ended June 30, 2025.

SUMMARY:

The audit for the Housing Authority of the City of San Antonio, Texas ("Opportunity Home") and its component units for the year ended June 30, 2025, has been completed. In planning the audit, Garza Gonzalez & Associates coordinated audit engagement details, established auditor and client responsibilities, and determined any significant changes in Opportunity Home's structure and personnel, as well as any new companies and new agreements that may impact the audit approach. Garza Gonzalez & Associates also verified any new accounting or audit requirements published by the U.S. Department of Housing and Urban Development, the Governmental Accounting Standards Board, or the American Institute of Certified Public Accountants, which would affect the audits.

Garza Gonzalez & Associates reports include:

- Independent Auditor's Report - Unmodified (clean audit)
- Internal Control over Financial Reporting and on Compliance and Other Matters - Unmodified (clean audit)
- Uniform Guidance Opinion - Unmodified (clean audit)
- Audit Communication Letter to Those Charged with Governance

Garza Gonzalez & Associates performed the following year-end tasks:

- Tested certain internal controls for the following significant Opportunity Home transaction cycles: cash receipts, cash disbursements, procurement, payroll, accumulation of component activity, recognition of related party activity, and financial close
- Tested major federal assistance programs for compliance with federal requirements
- Conducted fraud inquiries among employees, management, and Board members
- Conducted and evaluated preliminary analytical reviews to determine the nature and extent of procedures to be performed
- Established the audit approach, including preparation of tailored audit work programs
- Computed audit materiality to obtain reasonable assurance of detecting misstatements that could be material to the financial statements taken as a whole
- Reviewed and mailed Opportunity Home-prepared confirmations to customers, creditors,

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

- legal counsel, and banks
- Performed substantive procedures for the various financial statement account balances as of year-end, as deemed necessary, in the following areas: cash, investments, notes and developer fees receivable, grant and rent revenue, capital assets, payroll and related liabilities, escrow accounts, related party activity, assumption of partnership ownership, ground leases, and long-term debt
- Performed substantive procedures for operating and non-operating expenses
- Reviewed the Opportunity Home-prepared financial statements and utilized a disclosure checklist to ensure all significant disclosures are made
- Finalized analytical review procedures to assess the conclusions reached and evaluate the overall financial statement presentation
- Prepared final communication to management and the Board
- Prepared agreed-upon procedure report related to REAC
- Prepared and certified the Data Collection Form

Garza Gonzalez & Associates also issued audit reports as required by HUD or other contractual agreements for the following component units, all of which contained unmodified (clean audit) opinions:

- Converse Ranch, LLC
- Springhill/Courtland Heights Public Facility Corporation
- Pecan Hill Apartments, Inc.
- San Antonio Housing Facility Corporation
- SP II Limited Partnership
- O'Connor Road Limited Partnership
- Refugio Street Limited Partnership

The audit report for Opportunity Home includes the financial statements of the Housing Authority of the City of San Antonio Employees' Money Purchase Pension Plan and Trust (the "Plan"). Those financial statements were audited separately by other auditors, and Garza Gonzalez & Associates' opinion, insofar as it relates to the amounts included for the Plan, is based solely on the report of the other auditors.

STRATEGIC OUTCOMES:

Supports all strategic outcomes.

ATTACHMENTS:

Resolution 6910

Draft 2025 Opportunity Home Audit

2025 Audit Summary

**Opportunity Home San Antonio
Resolution 6910**

RESOLUTION 6910, ACCEPTING THE INDEPENDENT AUDITOR'S REPORT FOR THE YEAR ENDED JUNE 30, 2025

WHEREAS, the agency planning requirements of the Quality Housing and Work Responsibility Act of 1998 (QHWRA) and the U.S. Department of Housing and Urban Development's (HUD) October 21, 1999, Final Rule contain implementing instructions for agency planning requirements; and

WHEREAS, the OMB under Title 2 Code of Federal Regulations (CFR) Part 200, Subpart F, and the HUD regulations require that all Public Housing Authorities conduct a financial and compliance audit and submit it to the HUD local field office annually; and

WHEREAS, Opportunity Home has contracted with independent auditors that have conducted a financial and compliance audit of Opportunity Home and its related entities and have presented said report to the Opportunity Home Board of Commissioners on March 4, 2026; and

WHEREAS, the Independent Auditor's Report indicates an unmodified (clean audit) opinion on the Financial Audit Results; and

WHEREAS, staff requests that the Board of Commissioners review and accept the annual Independent Auditor's Report for the year ended June 30, 2025.

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

Approves Resolution 6910, accepting the Independent Auditor's Report for the year ended June 30, 2025.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz
Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes
President and CEO

Housing Authority of the City of San Antonio

Financial and Compliance Report
Year Ended June 30, 2025

Table of Contents

Independent auditor's report	3-5
Required supplementary information	
Management's discussion and analysis—unaudited	6-15
Basic financial statements	
Statement of net position	16-17
Statement of revenues, expenses and changes in net position	19
Statement of cash flows	20-21
Fiduciary fund financial statements	
Statement of plan net position	22
Statement of changes in plan net position	23
Notes to financial statements	25-63
Supplementary information	
Schedule of modernization costs	65
Compliance section	
Independent auditor's report on:	
Internal control over financial reporting and on compliance and other matters based on an audit of financial statements performed in accordance with <i>Government Auditing Standards</i>	68-69
Compliance for the major federal program and report on internal control over compliance required by the Uniform Guidance	70-72
Schedule of findings and questioned costs	73
Schedule of expenditures of federal awards	74-75
Notes to schedule of expenditures of federal awards	76

(This page intentionally left blank.)



INDEPENDENT AUDITOR'S REPORT

To the Board of Commissioners of
Opportunity Home San Antonio
San Antonio, Texas

Report on the Audit of the Financial Statements

Opinions

We have audited the accompanying financial statements of the business-type activities and the aggregate remaining fund information of the Opportunity Home San Antonio (Opportunity Home), as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise Opportunity Home's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities and the aggregate remaining fund information of Opportunity Home, as of June 30, 2025, and the respective changes in financial position, and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

We did not audit the financial statements of the Housing Authority of the City of San Antonio Employees' Money Purchase Pension Plan and Trust (the "Plan"), which comprises the Opportunity Home's aggregate remaining fund information. Those financial statements were audited by other auditors whose report thereon has been furnished to us, and our opinion, insofar as it relates to the amounts included for the Plan, is based solely on the report of the other auditors. The financial statements of the Plan were not audited in accordance with *Government Auditing Standards*.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of Opportunity Home and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Emphasis of Matter

As discussed in Note 3 to the financial statements, Opportunity Home adopted an allowance for doubtful accounts of \$58,789,485 for notes receivable and related accrued interest receivable as of June 30, 2025. Opportunity Home has determined that these receivables may be uncollectible based on an evaluation of the underlying financial condition of the debtors and other relevant factors. Our opinion is not modified with respect to this matter.



Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Opportunity Home's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Opportunity Home's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about Opportunity Home's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Opportunity Home's basic financial statements. The schedule of modernization costs and schedule of expenditures of federal awards, as required by Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, are presented for purposes of additional analysis and are not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of modernization costs and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated February XX, 2026, on our consideration of Opportunity Home's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of Opportunity Home's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering Opportunity Home's internal control over financial reporting and compliance.

February XX, 2026

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

This section of the Housing Authority of the City of San Antonio's (the Authority) annual financial report presents management's discussion and analysis (MD&A) of the Authority's financial performance during the fiscal year (FY) ended June 30, 2025, related to its business-type activities, as compared to the FY ended June 30, 2024. The business-type activities of the Authority include the following: Public Housing Program, Section 8 Housing Choice Voucher Program, Capital Fund Program, Community Development Initiatives, Affordable Housing Communities, and the San Antonio Housing Facility Corporation. The MD&A is designed to assist the reader in focusing on significant financial issues, provide an overview of the Authority's financial activity, identify changes in the Authority's financial position, and identify individual fund issues or concerns.

Since the MD&A is designed to focus on the current-year activities, resulting changes and currently known facts, we encourage readers to consider the information presented here in conjunction with the Authority's financial statements, which follow this section.

Overview of the Housing Authority of the City of San Antonio, Texas

The Authority is a municipal housing authority organized under the laws of the state of Texas (now Chapter 392 of the Texas Local Government Code) and by a resolution of the City Council of the City of San Antonio, Texas, adopted on June 17, 1937. The Authority's purpose is to provide and promote safe and sanitary housing for low-income persons residing in San Antonio, Texas. A seven-member Board of Commissioners (the Board), appointed by the Mayor of the City of San Antonio, governs the Authority. The Authority's trade name is Opportunity Home San Antonio ("Opportunity Home").

The Authority is one of 138 public housing authorities nationwide with a Moving to Work (MTW) designation from the United States Department of Housing and Urban Development (HUD). The Authority received its MTW designation from HUD in 1999 and approved a restated MTW agreement in June 2009, which extended the program for 10 additional years. During FY 2016, HUD issued a letter to all participating MTW agencies modifying and extending their existing contracts through 2028. The MTW agreement grants the Authority flexibility to develop policies outside the limitations of certain HUD regulations and provisions. As an MTW agency, the Authority's three primary goals are to promote and increase self-sufficiency among public housing and Section 8 residents, to increase housing choices for low-income families, and to achieve programmatic efficiencies and reduce costs. Every year, an MTW plan is developed, describing how flexibilities will be applied to best meet community needs with input from stakeholders, residents, and landlords. The MTW agreement also allows for funding fungibility by pooling the Public Housing operating subsidy, Section 8 Housing Choice Voucher subsidy, and Capital Funds.

Highlights

- The Authority's net position decreased by \$12.8 million (3.5%), primarily due to the recognition of an allowance for doubtful accounts on notes receivable from tax-credit partnerships.
- The Authority's tenant revenue increased by \$7.1 million (16.0%) from the prior year.
- The Authority's administrative expenses decreased by \$5.6 million (10.8%), and ordinary maintenance and operations expenses decreased by \$13.2 million (23.1%).
- The Authority's net capital assets increased by \$26.5 million (7.0%), primarily due to a land addition from a new ground lease and the acquisitions of The Alhambra, San Juan Square, and Elan Gardens, which added 511 units to the Affordable Housing Communities portfolio.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

- The Authority's current ratio was 3.25 at June 30, 2025, reflecting a strong liquidity position. This indicates that the Authority has more than three times the current assets needed to cover its short-term obligations.
- The Authority's debt-to-net position ratio was 0.47 at June 30, 2025. This relatively low level of leverage indicates that long-term obligations are moderate in relation to the Authority's net resources.

Overview of the Financial Statements

This discussion and analysis is intended to serve as an introduction to the Authority's basic financial statements, which are comprised of two components: (1) basic financial statements and (2) notes to financial statements. The basic financial statements include the operations of the Authority and its blended component units.

The statement of net position presents financial information on the Authority's total of assets and deferred outflows of resources, and total of liabilities and deferred inflows of resources, with the difference between the two reported as net position. Over time, increases or decreases in net position may serve as a useful indicator of whether the financial position of the Authority is improving or deteriorating.

The statement of revenues, expenses and changes in net position presents information showing how the Authority's net position changed during the most recent FY. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, regardless of the timing of related cash flows. Thus, revenues and expenses are reported for some items that will only result in cash inflows and cash outflows in future fiscal periods.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

Basic Financial Statements

As provided for under accounting principles generally accepted in the United States of America, the Authority uses the accrual basis of accounting to prepare its basic financial statements. Under this basis of accounting, revenues are recognized in the period in which they are earned and expenses, including depreciation and amortization, are recognized in the period in which they are incurred. All assets, deferred outflows of resources, liabilities, and deferred inflows of resources associated with the operations of the Authority are included in the statement of net position. The Authority presents its activities as a single enterprise proprietary fund. The basic financial statements begin on page 16 of this report.

Opportunity Home San Antonio

The Authority operates the following programs:

- **Housing Choice Voucher (HCV) Program**—a HUD-funded program that provides rent subsidies to families residing in privately owned rental properties.
- **Capital Improvement Programs**—HUD-funded programs that include the Capital Fund Program and the Capital Fund Financing Program, which provide funds for new construction and the rehabilitation of existing housing units.
- **Public Housing Program**—a HUD-funded program under which the Authority manages and maintains 6,070 public housing rental units for eligible low-income families, seniors and individuals with disabilities.

Pension Plan Trust Fund—Fiduciary Fund

The Housing Authority of the City of San Antonio Employees' Money Purchase Pension Plan and Trust, a component unit of the Authority, is accounted for as fiduciary activity in the fiduciary fund financial statements. The basic fiduciary fund financial statements begin on page 22 of this report.

Notes to Financial Statements

The notes to financial statements provide additional information that is essential to the full understanding of the data provided in the fund financial statements. The notes to financial statements begin on page 25 of this report.

Financial Analysis

General

Over time, net position may serve as a useful indicator of a government's financial position. At June 30, 2025, the Authority's assets and deferred outflows of resources exceeded liabilities and deferred inflows of resources by \$350,164,892. By far, the largest portion of net position is the Authority's investment in capital assets (e.g., land, buildings, furniture and equipment and construction in progress) less any related debt used to acquire those assets that is still outstanding. The Authority uses these capital assets to provide services and housing to its clients. Consequently, these assets are not available for future spending. Although the Authority's investment in capital assets is reported net of related debt, it should be noted the resources needed to repay this debt must be provided from other sources, since the capital assets themselves cannot be used to liquidate these liabilities.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

Condensed Statements of Net Position Information

Presented below is the Authority's condensed statements of net position for FY 2025 compared to FY 2024. This information reflects the economic resources of the Authority, as well as its economic obligations at the end of the FYs shown. See notes to financial statements.

Condensed Statements of Net Position

	FY 2025	FY 2024 Restated	Increase (Decrease)	Percentage Change
Assets:				
Unrestricted current assets	\$ 83,786,450	\$ 65,377,570	\$ 18,408,880	28.2%
Restricted current assets	48,637,131	45,434,253	3,202,878	7.0%
Net capital assets	403,406,615	376,862,942	26,543,673	7.0%
Other assets	45,230,578	100,408,614	(55,178,036)	(55.0%)
Total assets	581,060,774	588,083,379	(7,022,605)	(1.2%)
Deferred outflows of resources:				
Deferred charges on refunding	875,989	139,656	736,333	527.2%
Deferred swap outflows	339,328	78,722	260,606	331.0%
Total deferred outflows of resources	1,215,317	218,378	996,939	456.5%
Liabilities:				
Current liabilities	28,683,261	23,144,732	5,538,529	23.9%
Current liabilities payable from restricted assets	12,055,129	4,670,876	7,384,253	158.1%
Noncurrent liabilities	123,835,979	132,775,447	(8,939,468)	(6.7%)
Total liabilities	164,574,369	160,591,055	3,983,314	2.5%
Deferred inflows of resources:				
Leased assets	67,410,349	64,161,427	3,248,922	5.1%
Deferred swap inflows	126,481	576,776	(450,295)	(78.1%)
Total deferred inflows of resources	67,536,830	64,738,203	2,798,627	4.3%
Net position:				
Net investment in capital assets	260,425,368	238,896,650	21,528,718	9.0%
Restricted net position	44,224,742	50,424,695	(6,199,953)	(12.3%)
Unrestricted net position	45,514,782	73,651,154	(28,136,372)	(38.2%)
Total net position	\$ 350,164,892	\$ 362,972,499	\$ (12,807,607)	(3.5%)

Assets

The Authority's total assets at June 30, 2025 and 2024, amounted to \$581.1 million and \$588.1 million, respectively, reflecting a decrease of 1.2%. Unrestricted current assets increased by \$18.4 million, or 28.2%, primarily due to higher HAP-restricted cash following the discontinuation of Section 8 HAP prefunding and increased Cottage Creek II residual receipts. These increases were partly offset by declines in replacement reserves and operating reserves, the latter related to escrow releases at 100 Labor after conversion to permanent financing. Net capital assets increased by \$26.5 million, or 7.0%, primarily reflecting acquisitions within the Affordable Housing Communities portfolio, including The Alhambra, San Juan Square, and Elan Gardens Apartments. Land also increased due to a property transfer associated with the Augusta Flats transaction. These increases were partially offset by asset reclassifications of Rosemont at Highland Park and Costa Valencia to assets held for sale and by higher accumulated depreciation of \$13.8 million. Other assets decreased \$55.2 million, or 55.0%, primarily due to establishment of a \$58.8 million allowance for doubtful accounts on notes receivable from various tax-

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

credit partnerships, based on management's assessment that projected cash flows are insufficient to support full repayment.

Liabilities

Total liabilities of the Authority were \$164.6 million at June 30, 2025, compared with \$160.6 million at June 30, 2024, an increase of 2.5%. Current liabilities totaled \$28.7 million, an increase of \$5.5 million, or 23.9%. Debt of \$3.2 million for San Juan II was reclassified from noncurrent to current as it matures within 12 months. Increases in accounts payable and accrued compensated absences of \$1.8 million and \$1.8 million, respectively, also contributed to the growth in current liabilities. Current liabilities payable from restricted assets increased \$7.4 million, or 158.1%, primarily due to the reclassification of long-term debt for Rosemont at Highland Park (\$11.1 million), partially offset by the \$4.0 million repayment of current debt for Converse Ranch II. Noncurrent liabilities decreased by \$8.9 million, or 6.7%, primarily due to debt reclassifications to current liabilities and routine debt payments, partially offset by \$10.4 million in new debt for Elan Gardens.

Net Position

The Authority's net position totaled \$350.1 million at June 30, 2025, and is composed of net investment in capital assets of \$260.4 million; restricted net position of \$44.2 million; and unrestricted net position of \$45.5 million. Total net position decreased by \$11.2 million, or 3.1%, as a result of operations for the FY. The balance in unrestricted net position represents resources available to meet the Authority's ongoing obligations to tenants, citizens, and creditors.

Statements of Revenues, Expenses and Changes in Net Position Information

Presented on the following page is the statements of revenues, expenses and changes in net position information for FY 2025 compared to FY 2024. The information reflects the results of operations for the Authority and displays the sources of revenue, the nature of expenses for the year and the resulting change in net position. All revenues and expenses are accounted for on an accrual basis. See notes to financial statements.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

Statements of Revenues, Expenses and Changes in Net Position

	FY 2025	FY 2024 Restated	Increase (Decrease)	Percentage Change
Operating revenues:				
Tenant	\$ 51,626,624	\$ 44,518,740	\$ 7,107,884	16.0%
HUD operating subsidy and grant revenue	214,514,097	205,251,989	9,262,108	4.5%
Other government grants	11,575,390	35,768	11,539,622	32262.4%
Other revenue	12,725,941	17,100,963	(4,375,022)	(25.6%)
Total operating revenues	290,442,052	266,907,460	23,534,592	8.8%
Operating expenses:				
Administrative	46,501,660	52,122,201	(5,620,541)	(10.8%)
Tenant services	4,890,166	6,329,594	(1,439,428)	(22.7%)
Utilities	11,297,231	10,764,689	532,542	4.9%
Ordinary maintenance and operations	43,855,771	57,041,453	(13,185,682)	(23.1%)
Protective services	2,933,360	4,196,173	(1,262,813)	(30.1%)
Insurance	5,951,543	4,857,083	1,094,460	22.5%
Bad debts	59,283,892	3,310,932	55,972,960	1690.5%
Other	2,582,360	5,902,499	(3,320,139)	(56.2%)
Housing assistance payments	124,675,305	112,762,343	11,912,962	10.6%
Depreciation	18,074,226	16,537,267	1,536,959	9.3%
Amortization expense	784,277	437,827	346,450	79.1%
Total operating expenses	320,829,791	274,262,061	46,567,730	17.0%
Operating income (loss)	(30,387,739)	(7,354,601)	(23,033,138)	313.2%
Nonoperating revenues (expenses):				
Investment income	2,849,212	4,069,211	(1,219,999)	(30.0%)
Interest income—leases	167,217	150,376	16,841	11.2%
Mortgage interest income	1,945,287	1,296,502	648,785	50.0%
Recovery of Section 8 funds	5,717	3,651	2,066	56.6%
Interest expense	(5,612,047)	(6,165,638)	553,591	(9.0%)
Gain on disposition/retirement of capital assets	142,601	2,582,068	(2,439,467)	(94.5%)
Purchase of limited partnership interests	(3,104,481)	(350,000)	(2,754,481)	787.0%
Other acquisition costs	(115,353)	-	(115,353)	N/A
Contributed land	9,507,449	-	9,507,449	N/A
Insurance recoveries, net	1,679,036	620,407	1,058,629	170.6%
Refinancing and closing costs	(1,051,162)	-	(1,051,162)	N/A
Trustee and swap advisor fees	(8,710)	(8,710)	-	0.0%
Total nonoperating revenues (expenses)	6,404,766	2,197,867	4,206,899	191.4%
Increase (decrease) in net position before capital contributions	(23,982,973)	(5,156,734)	(18,826,239)	365.1%
Capital contributions	14,164,295	10,085,839	4,078,456	40.4%
Equity transfers	(308,000)	(7,051,615)	6,743,615	(95.6%)
Change in net position	(10,126,678)	(2,122,510)	(8,004,168)	377.1%
Net position at beginning of year	362,972,499	362,364,496	608,003	0.2%
Change in reporting entity	(2,680,929)	2,730,513	(5,411,442)	(198.2%)
Net position at end of year	\$ 350,164,892	\$ 362,972,499	\$ (12,807,607)	(3.5%)

Housing Authority of the City of San Antonio

Management’s Discussion and Analysis—Unaudited
Year Ended June 30, 2025

Operating Revenues and Expenses

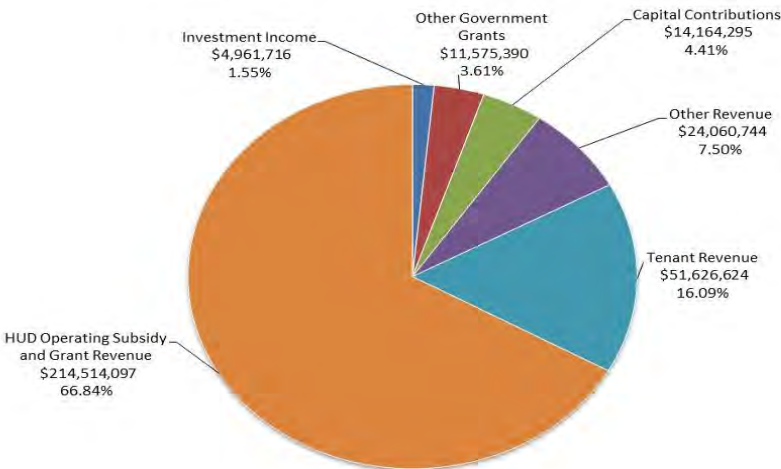
Operating revenues increased by \$23.5 million, or 8.8%, over the previous year and operating expenses increased by \$46.6 million, or 17.0%. HUD operating subsidy and grant revenue increased by \$9.3 million, or 4.5%, compared to FY 2024, primarily due to higher Section 8 Housing Assistance Payments (“HAP”). Section 8 HAP revenue totaled \$149.6 million in FY 2025, compared to \$145.2 million in FY 2024, reflecting increased leasing activity and higher payment standards. In addition, during FY 2025 the Authority received \$5.6 million from HUD’s 2024 Shortfall Funding. Other government grants increased by \$11.5 million, primarily attributable to \$11.6 million received from the City of San Antonio’s Affordable Housing Bond, which was used for rental rehabilitation at various properties. The primary source of revenue, other than HUD funding, is tenant revenue, which increased by \$7.1 million, or 16.0%, over the prior year. The \$4.4 million, or 25.6%, decrease in other revenue in FY 2025 is due to FY 2024 including \$7.0 million in revenue from the sale of Culebra Commons, partially offset by a \$3.0 million increase in development fee revenue. The \$46.6 million increase in total operating expenses was primarily driven by a \$56.0 million increase in bad debt expense, reflecting the establishment of a \$58.8 million allowance for doubtful accounts associated with notes receivable from various tax-credit partnerships. Based on an evaluation of the partnerships’ historical audited financial statements, projected cash flows were determined to be insufficient to support full repayment of the outstanding notes. Administrative expenses and ordinary maintenance and operations expenses declined by \$5.6 million (10.8%) and \$13.2 million (23.1%), respectively, due to cost-containment measures, reduced spending on contracted services, and lower maintenance activity compared with the prior year. Depreciation expense, which does not involve cash outflows but impacts total operating expenses, totaled \$18.1 million.

Nonoperating Revenues, Expenses and Changes in Net Position

The change in net position from FY 2024 to FY 2025 reflects a decrease of \$10.1 million, compared with a \$2.1 million decrease from FY 2023 to FY 2024. The \$9.5 million reported as contributed land relates to the conveyance of land for the Augusta Flats project, which will be leased back to the partnership under a 99-year ground lease. The \$3.1 million purchase of limited partnership interests relates to the acquisitions of The Alhambra, San Juan Square, and Elan Gardens. Capital contributions increased by \$4.1 million over the prior year and consisted of \$14.2 million in HUD capital grants.

Revenue by Source—Business-Type Activities

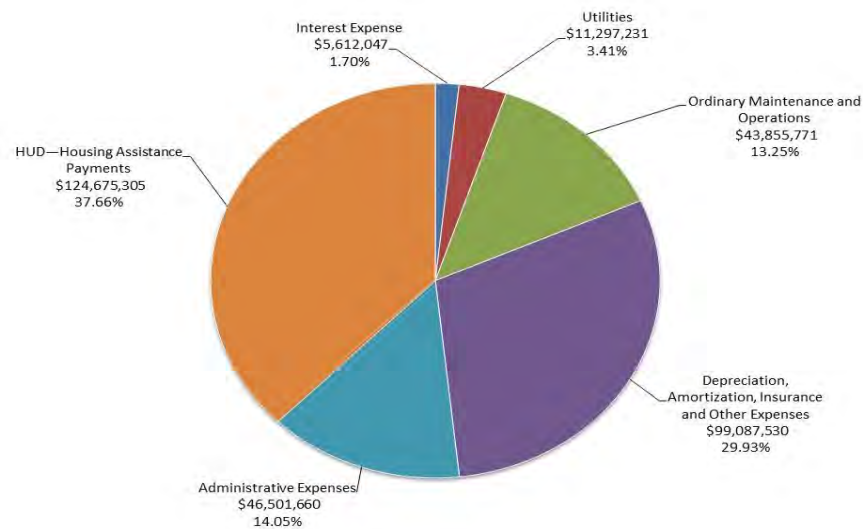
Total Revenue—\$320,902,866



Housing Authority of the City of San Antonio
Management’s Discussion and Analysis—Unaudited
Year Ended June 30, 2025

Expenses by Use—Business-Type Activities

Total Expenses—\$331,029,544



Capital Assets and Debt Administration

Net Capital Assets

At the end of FY 2025, the Authority had invested \$403,406,615 in a broad range of capital assets, including land, buildings, furniture, equipment, vehicles and construction in progress. The schedule below reflects the changes in capital assets, net of depreciation, during FY 2025:

Schedule of Changes in Capital Assets—FY 2025

Beginning net capital assets	\$ 376,862,942
Additions and transfers in/out	89,031,072
Deletions, net	(44,413,173)
Depreciation	(18,074,226)
Ending net capital assets	<u>\$ 403,406,615</u>

Net capital assets increased by \$26.5 million in FY 2025 when compared to FY 2024. Additions and transfers totaled \$89.0 million, while deletions totaled \$44.4 million. Total depreciation expense for FY 2025 was \$18.1 million. The majority of the additions were attributable to buildings, land, and construction in progress. Additional information on the Authority’s capital assets can be found in Note 8 of the notes to financial statements.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

Long-Term Debt

At the end of FY 2025, the Authority had total long-term debt of \$139.0 million. Of this amount, \$38.0 million represents the remaining principal balance of bonds that were issued to purchase or rehabilitate properties owned by component units of the Authority. The Authority's debt increased by \$3.1 million when compared to FY 2024.

Additional information on the Authority's long-term debt can be found in Note 10 of the notes to financial statements.

Economic Factors and Next Year's Budget

Significant economic factors affecting the Authority's budget in the next year are as follows:

- Federal funding provided by Congress to the Department of Housing and Urban Development
- Local labor supply and demand, which can affect salary and wage rates
- Local inflationary, recessionary and employment trends, which can affect resident incomes and, therefore, the amount of rental income
- Inflationary pressure on utility rates, housing costs, supplies and other costs
- Current trends in the housing market
- Local and national property rental markets that determine Housing Assistance Payments

The Authority is primarily dependent upon HUD for the funding of its Low Rent Public Housing, Housing Choice Voucher, and Capital Fund programs; therefore, the Authority is affected more by the federal budget than by local economic conditions.

The operating budgets for the Authority's 2025-2026 FY were approved by the Board of Commissioners on June 18, 2025, and became effective July 1, 2025. The Authority's budget is balanced, with estimated revenues of \$300.6 million, with these funds being used primarily for Section 8 payments to landlords, public housing operations, salaries and benefits, upgrades, repairs and maintenance of the Authority's housing communities, as well as other operating costs.

The Authority's goal remains to continue to provide housing to over 57,000 children, adults, and senior citizens served through its three core housing programs: Section 8, Public Housing, and Affordable Housing Communities. In FY 2026, the Authority looks forward to developing additional high-quality affordable housing units; significantly enhancing property management and housing operations; expanding educational, job training and health services to residents, and implementing additional efficiencies across the Authority.

Housing Authority of the City of San Antonio

Management's Discussion and Analysis—Unaudited Year Ended June 30, 2025

Requests for Information

This financial report is designed to provide our citizens, taxpayers, tenants, investors, and creditors with a general overview of the Authority's finances and to demonstrate the Authority's accountability for the funds it receives. Questions concerning any of the information provided in this report, or the Authority's component units, or requests for additional information should be addressed to:

Opportunity Home San Antonio
Attn: Diana Kollodziej Fiedler, CPA
Executive Vice President, Chief Financial Officer
P.O. Box 1300
San Antonio, Texas 78295-1300

Basic Financial Statements

Housing Authority of the City of San Antonio

Statement of Net Position

June 30, 2025

Assets and Deferred Outflows of Resources

Assets:

Current assets:

Unrestricted assets:

Cash and cash equivalents:

Unrestricted

	\$	44,722,635
Tenant security deposits		381,382
Accounts receivable—HUD		7,906,510
Accounts receivable—miscellaneous		10,556,957
Accounts receivable—tenants		4,023,896
Allowance for doubtful accounts—tenants		(1,975,759)
Notes and mortgages receivable		6,161
Accrued interest receivable—notes		554,740
Accrued interest receivable—leases		71,329
Leases receivable		183,384
Assets held for sale		16,977,201
Prepaid expenses and other assets		378,014
Total unrestricted assets		83,786,450

Restricted assets:

Cash and cash equivalents—modernization and development		13,124,732
Cash and cash equivalents—payment of current liabilities		2,546,600
Cash and cash equivalents—held by lender and trustee		6,491,560
Cash and cash equivalents—other		26,474,239
Total restricted assets		48,637,131

Total current assets

132,423,581

Noncurrent assets:

Capital assets:

Land		133,199,973
Buildings and improvements		712,465,519
Furniture and equipment—dwellings		4,927,121
Furniture and equipment—administration		9,597,920
Leasehold improvements		2,817,236
Construction in progress		29,172,294
		892,180,063
Less accumulated depreciation		(488,773,448)
Net capital assets		403,406,615

Other noncurrent assets:

Notes and mortgages receivable		67,335,864
Allowance for doubtful accounts—notes and mortgages receivable		(58,789,485)
Accrued interest receivable		11,902,764
Leases receivable		3,116,059
Subscription assets, net of accumulated amortization		1,630,313
Other assets and developer fees receivable		22,184,399
Allowance for doubtful accounts—developer fees		(3,775,463)
Interest rate swap assets		126,481
Equity in partnership investments		1,499,646
Total noncurrent assets		45,230,578

Total assets

581,060,774

Deferred outflows of resources:

Deferred charges on refunding		875,989
Deferred swap outflows		339,328
Total deferred outflows of resources		1,215,317

Housing Authority of the City of San Antonio

Statement of Net Position

June 30, 2025

Liabilities, Deferred Inflows of Resources, and Net Position

Liabilities:

Current liabilities:

Unrestricted current liabilities:

Accounts payable	\$ 8,719,298
Construction payable	3,546,843
Accrued wages and payroll taxes	997,892
Accrued compensated absences	1,998,558
Accrued contingencies	388,209
Accounts payable—HUD PHA projects	414,237
Tenant security deposits	2,225,574
Unearned revenue—tenants	645,495
Unearned revenue—other	622,424
Current portion of long-term debt	7,351,606
Subscription liability	567,856
Other current liabilities	880,504
Accrued interest payable	199,819
Accrued liabilities	124,946
Total unrestricted current liabilities	28,683,261

Current liabilities payable from restricted assets:

Long-term debt—current portion	11,267,797
Accrued interest payable	63,087
Family Self-Sufficiency (FSS) escrow	724,245
Total current liabilities payable from restricted assets	12,055,129

Total current liabilities

40,738,390

Noncurrent liabilities:

Long-term debt	120,427,663
FSS escrow payable	1,710,817
Subscription liability	1,090,580
Accrued compensated absences	267,591
Interest rate swap liabilities	339,328
Total noncurrent liabilities	123,835,979

Total liabilities

164,574,369

Deferred inflows of resources:

Leased assets	67,410,349
Deferred swap inflow	126,481
Total deferred inflows of resources	67,536,830

Net position:

Net investment in capital assets	260,425,368
Restricted net position	44,224,742
Unrestricted net position	45,514,782
Total net position	\$ 350,164,892

See notes to financial statements.

(This page intentionally left blank.)

Housing Authority of the City of San Antonio

Statement of Revenues, Expenses and Changes in Net Position Year Ended June 30, 2025

Operating revenues:	
Net tenant rental revenue	\$ 49,674,914
Tenant revenue—other	1,951,710
HUD operating subsidy and grant revenue	214,514,097
Other government grants	11,575,390
Other revenue	12,725,941
Total operating revenues	290,442,052
Operating expenses:	
Administrative	46,501,660
Tenant services	4,890,166
Utilities	11,297,231
Ordinary maintenance and operations	43,855,771
Protective services	2,933,360
Insurance	5,951,543
Bad debts	59,283,892
Other	2,582,360
Housing assistance payments	124,675,305
Depreciation	18,074,226
Amortization expense	784,277
Total operating expenses	320,829,791
Operating loss	(30,387,739)
Nonoperating revenues (expenses):	
Investment income—unrestricted	2,061,301
Investment income—restricted	787,911
Interest income—leases	167,217
Mortgage interest income	1,945,287
Recovery of Section 8 funds	5,717
Interest expense	(5,612,047)
Gain on disposition/retirement of capital assets	142,601
Purchase of limited partnership interests	(3,104,481)
Other acquisition costs	(115,353)
Contributed land	9,507,449
Insurance recoveries, net	1,679,036
Refinancing and closing costs	(1,051,162)
Trustee fees	(8,710)
Total nonoperating revenues (expenses)	6,404,766
Decrease in net position before capital contributions	(23,982,973)
Capital contributions	14,164,295
Equity transfers	(308,000)
Change in net position	(10,126,678)
Net position at beginning of year – restated	362,972,499
Change in reporting entity	(2,680,929)
Net position at end of year	\$ 350,164,892

See notes to financial statements.

Housing Authority of the City of San Antonio**Statement of Cash Flows**
Year Ended June 30, 2025

Cash flows from operating activities:	
Dwelling rent receipts	\$ 52,031,698
Operating subsidy and grant receipts	221,468,565
Other income receipts	1,558,746
Cash received from developers	1,262,348
Total receipts	276,321,357
Payments to suppliers for goods and services	(61,711,441)
Payments to employees	(48,383,564)
Housing assistance payments	(124,675,305)
Total disbursements	(234,770,310)
Net cash provided by operating activities	41,551,047
Cash flows from noncapital financing activities:	
Recovery of Section 8 funds	5,717
Net cash provided by noncapital financing activities	5,717
Cash flows from capital and related financing activities:	
Acquisition and construction of capital assets	(35,107,967)
Refinancing and closing costs	(375,709)
Trustee and swap advisor fees	(8,710)
Proceeds from insurance on capital assets	1,703,015
Proceeds from capital grants	14,164,295
Proceeds from collection of leases receivable	368,546
Subscription payments	(334,953)
Receipt of prepaid ground leases	2,949,271
Proceeds from long-term borrowings	12,826,670
Principal payments on mortgage and notes payable	(15,007,266)
Interest paid on long-term debt	(5,448,751)
Cash paid to escrow agent for bond defeasance	(10,404,844)
Homeownership and FSS escrow	(95,337)
Equity transfers	(1,156,834)
Proceeds from sale of capital assets	1,841,947
Net cash used in capital and related financing activities	(34,086,627)
Cash flows from investing activities:	
Collections on notes receivable	1,061,848
Issuance of notes receivable	(4,333,056)
Investment income received	2,849,316
Purchase of limited partnership interests	(3,104,481)
Interest on notes and mortgages receivable	4,293
Other investing activities	695,377
Net cash used in investing activities	(2,826,703)
Net increase in cash and cash equivalents	4,643,434
Cash and cash equivalents at beginning of year	89,097,714
Cash and cash equivalents at end of year	\$ 93,741,148
Supplementary schedule of non-cash investing, capital and financing transactions:	
Capital assets acquired in exchange for assumption of debt	\$ 18,677,324
Assumed debt in exchange for acquisition of capital assets	\$ 15,687,226

(Continued)

Housing Authority of the City of San Antonio

Statement of Cash Flows Year Ended June 30, 2025

Reconciliation to statement of net position:

Unrestricted cash and cash equivalents	\$ 44,722,635
Tenant security deposits	381,382
Restricted cash and cash equivalents—modernization and development	13,124,732
Restricted cash and cash equivalents—payment of current liabilities	2,546,600
Restricted cash and cash equivalents—held by lender and trustee	6,491,560
Restricted cash and cash equivalents—other	26,474,239
	<u>\$ 93,741,148</u>

Reconciliation of operating income to net cash provided by operating activities:

Operating loss	\$ (30,387,739)
Adjustments to reconcile operating loss to net cash provided by operating activities:	
Depreciation	18,074,226
Amortization expense	784,277
Lease revenue/amortization of deferred inflows of resources—leased assets	94,054
Expensed debt issuance costs	(473,278)
Bad debt expense	58,751,295
Noncash gain on acquisition	52,578
Net changes in assets and liabilities:	
Tenants receivable, net	228,275
HUD receivable	(4,332,182)
Miscellaneous receivables	4,957,829
Other assets and developer fees receivable	(5,891,697)
Allowance for doubtful accounts—other	529,694
Prepaid expenses and other assets	9,268,801
Accounts payable	344,983
Accrued wages and payroll taxes	(520,361)
Accrued compensated absences	(110,256)
Accrued contingencies	(592,216)
Tenant security deposits	137,579
Unearned revenue—tenants	(13,683)
Unearned revenue—other	(274,000)
Other current liabilities	(8,999,153)
Accrued liabilities	(77,979)

Net cash provided by operating activities

\$ 41,551,047

See notes to financial statements.

Housing Authority of the City of San Antonio**Statement of Plan Net Position—Fiduciary Fund
December 31, 2024****Assets:**

Cash and cash equivalents	\$ 644,099

Investments:

Mutual funds—equity	44,537,645
Mutual funds—fixed income	20,303,013
Total investments	64,840,658

Receivables:

Employee contributions	41,950
Employer contributions	92,238
Total receivables	134,188
Total assets	65,618,945

Liabilities:

Accrued investment manager expenses	41,918
Total liabilities	41,918

Net position restricted for pension	\$ 65,577,027

See notes to financial statements.

Housing Authority of the City of San Antonio**Statement of Changes in Plan Net Position—Fiduciary Fund
Year Ended December 31, 2024**

Additions:

Contributions:

Employee	\$ 1,777,422
Employer	3,817,717
Total contributions	<u>5,595,139</u>

Investment income (expenses):

Interest and dividends	126,821
Net appreciation in fair value of investments	7,619,187
Less investment expense	<u>(88,437)</u>
Net investment income	<u>7,657,571</u>

Total additions	<u>13,252,710</u>

Deductions:

Benefits paid to participants	(4,216,703)
Administrative expenses	<u>(141,148)</u>
Total deductions	<u>(4,357,851)</u>

Net increase in fiduciary net position	8,894,859

Net position restricted for pension at beginning of year	<u>56,682,168</u>

Net position restricted for pension at end of year	<u>\$ 65,577,027</u>

See notes to financial statements.

(This page intentionally left blank.)

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies

The financial statements of the Housing Authority of the City of San Antonio (Authority) have been prepared in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP) for government entities. The Governmental Accounting Standards Board (GASB) is the governing body for establishing governmental accounting and financial reporting standards. The more significant of the Authority's accounting policies are described below.

A. Reporting Entity

The Authority was created by the City of San Antonio in 1937, under the provisions of the United States Housing Act of 1937, as a public benefit corporation. The Board of Commissioners (the Board), a seven-member group appointed by the Mayor, has governance responsibility over all activities related to the Authority. These financial statements present the Authority and its component units: entities for which the Authority is considered to be financially accountable and which serve as the Authority's instruments to enhance its purpose to build and maintain affordable housing for low- and moderate-income families.

Blended component units, although legally separate entities are, in substance, part of the Authority's operations. Thus, blended component units are appropriately presented as funds of the primary government. Each blended component unit has a June 30 year-end. The governing boards of the following component units are the same as the primary government's governing board. Additionally, the management of the primary government has operational responsibility for the component units, thereby making them blended component units.

Because members of the Board have the authority to make decisions, appoint administrators and managers, and significantly influence operations and have primary accountability for fiscal matters, the Authority is not included in any other governmental "reporting entity" as defined by GASB Codification Section 2100, *Defining the Financial Reporting Entity*.

Blended Component Units—Enterprise Funds

The following component units are combined with the Authority's activities.

San Antonio Housing Facility Corporation (SAHFAC)

SAHFAC is organized under section 501(c)(3) of the IRC. SAHFAC owns 14 multi-family rental developments with 1,466 units. SAHFAC serves as the general partner for Homestead Redevelopment Partnership, Ltd. (Homestead) and is the sole member of various limited liability companies that are general partners of tax credit limited partnerships. Additionally, SAHFAC leases the Central Office Building to the Authority with a lease term of 40 years, expiring in 2035.

San Antonio Housing Development Corporation (SAHDC)

SAHDC, organized in 1977 under section 501(c)(3) of the Internal Revenue Code (IRC), owns four multi-family rental developments with 506 apartments and manages one senior citizen development that is a component unit of the Authority. SAHDC also serves as the developer and general partner of three limited partnerships created with private investors to expand housing opportunities for low-income families and senior citizens. SAHDC serves as the general partner for Vera Cruz Redevelopment Partnership, Ltd. (Vera Cruz).

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

San Antonio Housing Finance Corporation (SAHFC)

SAHFC was created under the Texas Housing Finance Corporations Act as a vehicle through which tax-exempt housing revenue bonds are issued to finance the construction, acquisition and renovation for occupancy by low- and moderate-income families. The users of the bond proceeds are liable for repayment of the bonds. SAHFC retains no liability relating to the bond issues.

SP II Limited Partnership (SP II)

SP II (a Texas limited partnership) is an investment of SAHDC (as general partner). SP II was formed in October 2001 to acquire, construct, develop, and operate a 120-unit apartment project known as Legacy at Science Park in San Antonio, Texas. In December 2019, SAHFAC acquired a 99.99% interest in the partnership. The partnership is now a wholly owned entity of an Authority affiliate.

O'Connor Road Limited Partnership (O'Connor)

O'Connor (a Texas limited partnership) is an investment of SAHDC (as general partner). O'Connor was formed in October 2001 to acquire, construct, develop, and operate a 150-unit apartment project known as Legacy at O'Connor Road in San Antonio, Texas. In December 2019, SAHFAC acquired a 99.99% interest in the partnership. The partnership is now a wholly owned entity of an Authority affiliate.

Refugio Street Limited Partnership (Refugio)

Refugio (a Texas limited partnership) is an investment of RSPFC (as general partner). Refugio was formed in November 2002 to acquire, construct, develop, and operate a 210-unit apartment project known as Refugio Place Apartment Homes in San Antonio, Texas. In December 2019, SAHFAC acquired a 99.99% interest in the partnership. The partnership is now a wholly owned entity of an Authority affiliate.

San Antonio Homeownership Opportunities Corporation

In July 1994, the Authority created San Antonio Homeownership Opportunities Corporation under section 501(c)(3) of the IRC to redevelop single-family properties to provide opportunities for lower income families to buy their first home through lease-purchase and other programs.

Las Varas PFC (LVPFC)

Las Varas PFC, created in September 2005, is a Texas nonprofit public corporation and public instrumentality under section 103 of the IRC and was organized to act on behalf of the Authority, as provided by the Texas PFC Act. It serves as the sole member of various limited liability companies that are general partners of tax credit limited partnerships.

Springhill/Courtland Heights (Springhill/Courtland Heights) Public Facility Corporation (PFC)

Springhill/Courtland Heights PFC, created in 1998, is a Texas nonprofit public corporation and public instrumentality under section 103 of the IRC. It was organized to act on behalf of the Authority, as provided by the Texas PFC Act, as amended, for financing the acquisition, rehabilitation, renovation, repair, equipping and furnishing of three multi-family apartment complexes with 505 units. Springhill/Courtland Heights PFC receives rental subsidies pursuant to a Housing Assistance Payment (HAP) contract with HUD for persons of low-to-moderate income.

Woodhill PFC

Woodhill PFC, created in 1999, is a Texas nonprofit public corporation and public instrumentality under section 103 of the IRC. It was organized to act on behalf of the Authority, as provided by the Texas PFC Act, as amended, for financing the acquisition, rehabilitation, renovation, repair, equipping and furnishing of one multi-family apartment complex with 532 units.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Refugio Street PFC (RSPFC)

Refugio Street PFC, created in December 2001, is a Texas nonprofit public corporation and public instrumentality under section 103 of the IRC and organized to act on behalf of the Authority, as provided by the Texas PFC Act, as amended. Refugio Street PFC serves as general partner for Refugio Street Limited Partnership. The partnership was formed for the purpose of financing the acquisition and development of one multi-family apartment complex with 210 units.

Sendero I PFC

Sendero I PFC, created in 2002, is a Texas nonprofit public corporation and public instrumentality under section 103 of the IRC. It was organized to act on behalf of the Authority, as provided by the Texas PFC Act, as amended, for the purpose of financing the acquisition and development of a 192-unit affordable housing project. Affordable rents shall not exceed certain thresholds based on percentages of area median income.

Vera Cruz Redevelopment Partnership, Ltd. (Vera Cruz)

Vera Cruz (a Texas limited partnership) is an investment of SAHDC (as general partner). Vera Cruz was formed on October 31, 1991, to acquire, own, develop, improve and lease the 29-unit Villa de San Alfonso Senior Citizens Apartments to low-income tenants and is operated in a manner to qualify for federal low-income housing tax credits. In October 2009, SAHFAC acquired a 99% interest in the partnership. The partnership is now a wholly owned entity of an Authority affiliate.

Homestead Redevelopment Partnership, Ltd. (Homestead)

Homestead (a Texas limited partnership) is an investment of SAHFAC (as general partner). Homestead was formed on October 31, 1991, to acquire, own, develop, improve and lease the 158-unit Homestead Apartments to low-income tenants and is operated in a manner to qualify for federal low-income housing tax credits. In September 2009, SAHDC acquired a 75% interest in the partnership. SAHDC acquired an additional 24% interest in June 2011. The partnership is now a wholly owned entity of an Authority affiliate.

Converse Ranch, LLC

Converse Ranch, LLC was organized as a Texas limited liability company on April 5, 2007, to acquire the 124-unit apartment complex known as Converse Ranch Apartments. Currently, the Authority serves as the sole owner of Converse Ranch, LLC.

Converse Ranch II, LLC

Converse Ranch II, LLC was organized as a Texas limited liability company on May 27, 2009, to acquire the 104-unit apartment complex known as Converse Ranch Apartments (Phase II). Currently, SAHFAC serves as the sole owner of Converse Ranch II, LLC.

Sunshine Plaza Apartments, Inc.

Sunshine Plaza Apartments, Inc. was formed in 1988 under section 501(c)(3) of the IRC to serve as owner of the Sunshine Plaza Apartments, a 100-unit senior citizens housing development, built under HUD Section 8—New Construction Program.

Pecan Hill Apartments, Inc.

Pecan Hill Apartments, Inc. was formed in 1988 under section 501(c)(3) of the IRC to serve as owner of the Pecan Hill Apartments, a 100-unit senior citizens housing development, built under HUD Section 8—New Construction Program.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Education Investment Foundation, Inc.

Education Investment Foundation, Inc., created in 1991 pursuant to section 501(c)(3) of the IRC, supports the residents of public housing and Section 8-assisted units through educational scholarships, recreational activities and family self-sufficiency (FSS) training programs.

Presented on the following pages are condensed financial statements for the blended component units. Included are condensed statements of net position and condensed statements of revenues, expenses and changes in net position.

Condensed Statements of Net Position (Deficit) June 30, 2025

	San Antonio Housing Facility Corporation	San Antonio Housing Development Corporation	San Antonio Housing Finance Corporation	SP II Limited Partnership	O'Connor Road Limited Partnership	Refugio Street Limited Partnership
Assets:						
Current assets	\$ 26,787,966	\$ 25,972,055	\$ 574,337	\$ 387,590	\$ 432,086	\$ 1,324,434
Restricted current assets	6,113,064	2,256,601	-	928,459	1,092,992	1,348,377
Net capital assets	168,917,010	46,958,409	154,983	2,933,952	3,786,998	7,977,402
Other assets	40,174,230	9,165,483	-	-	-	-
Total assets	241,992,270	84,352,548	729,320	4,250,001	5,312,076	10,650,213
Deferred outflows of resources:						
Deferred charges on refunding	-	-	-	-	-	-
Deferred swap outflow	742,730	339,328	-	-	-	-
Total deferred outflows of resources	742,730	339,328	-	-	-	-
Liabilities:						
Unrestricted current liabilities	8,550,006	20,306,125	59	123,584	308,386	346,921
Liabilities payable from restricted assets	-	11,267,797	-	-	-	-
Long-term debt	92,853,992	32,462,242	-	4,383,024	5,461,884	13,885,039
Other long-term liabilities	249,182	6,151,407	-	-	-	-
Total liabilities	101,653,180	70,187,571	59	4,506,608	5,770,270	14,231,960
Deferred inflows of resources:						
Leased assets	67,171,203	249,663	-	-	-	-
Deferred swap inflow	62,958	-	-	-	-	-
Total deferred inflows of resources	67,234,161	249,663	-	-	-	-
Net position (deficit):						
Net investment (deficit) in capital assets	87,078,066	3,576,802	154,983	(1,520,324)	(1,763,676)	(5,644,675)
Restricted	5,766,859	2,256,602	-	928,459	1,092,992	935,362
Unrestricted (deficit)	(18,997,266)	8,421,238	574,278	335,258	212,490	1,127,566
Total net position (deficit)	\$ 73,847,659	\$ 14,254,642	\$ 729,261	\$ (256,607)	\$ (458,194)	\$ (3,581,747)

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Condensed Statements of Net Position (Deficit) June 30, 2025

	San Antonio Homeownership Opportunities Corporation	Las Varas PFC	Springhill/ Courtland Heights PFC	Woodhill PFC	Refugio Street PFC	Sendero I PFC
Assets:						
Current assets	\$ 116,805	\$ 10,191,393	\$ 1,049,372	\$ 1,287,797	\$ 1,107,732	\$ 3,674,581
Restricted current assets	27,855	478,956	2,181,853	-	8,170,568	-
Net capital assets	-	14,308,975	6,241,306	11,534,889	-	5,482,220
Other assets	88,800	4,729,136	142,708	94,120	3,083,476	34,562
Total assets	233,460	29,708,460	9,615,239	12,916,806	12,361,776	9,191,363
Deferred outflows of resources:						
Deferred charges on refunding	-	-	-	-	-	-
Deferred swap outflow	-	-	-	-	-	-
Total deferred outflows of resources	-	-	-	-	-	-
Liabilities:						
Unrestricted current liabilities	13,368	818,669	1,376,966	997,045	-	202,873
Liabilities payable from restricted assets	-	-	-	-	-	-
Long-term debt	-	1,466,667	4,257,168	-	-	-
Other long-term liabilities	-	-	33,490	44,013	-	16,179
Total liabilities	13,368	2,285,336	5,667,624	1,041,058	-	219,052
Deferred inflows of resources:						
Leased assets	-	-	-	-	-	-
Deferred swap inflow	-	-	63,523	-	-	-
Total deferred inflows of resources	-	-	63,523	-	-	-
Net position (deficit):						
Net investment (deficit) in capital assets	-	16,925,685	1,775,097	11,534,889	-	5,482,220
Restricted	27,855	-	2,181,853	-	8,170,568	-
Unrestricted (deficit)	192,237	10,497,439	(72,858)	340,859	4,191,208	3,490,091
Total net position (deficit)	\$ 220,092	\$ 27,423,124	\$ 3,884,092	\$ 11,875,748	\$ 12,361,776	\$ 8,972,311

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Condensed Statements of Net Position (Deficit) June 30, 2025

	Vera Cruz Redevelopment Partnership, Ltd.	Homestead Redevelopment Partnership, Ltd.	Converse Ranch, LLC	Converse Ranch II, LLC	Sunshine Plaza Apartments, Inc.	Pecan Hill Apartments, Inc.
Assets:						
Current assets	\$ 3,965	\$ 23,471	\$ 423,759	\$ 414,575	\$ 2,666,712	\$ 2,103,734
Restricted current assets	-	-	402,936	33,190	33,931	-
Net capital assets	448,320	32,010	5,186,567	4,872,495	2,969,871	1,711,517
Other assets	6,250	29,850	24,873	16,277	18,891	19,879
Total assets	458,535	85,331	6,038,135	5,336,537	5,689,405	3,835,130
Deferred outflows of resources:						
Deferred charges on refunding	-	-	133,259	-	-	-
Deferred swap outflow	-	-	-	-	-	-
Total deferred outflows of resources	-	-	133,259	-	-	-
Liabilities:						
Unrestricted current liabilities	110,427	775,788	302,183	944,612	231,465	332,439
Liabilities payable from restricted assets	-	-	-	-	-	-
Long-term debt	-	4,215,576	5,895,330	-	2,177,873	-
Other long-term liabilities	2,582	13,535	13,039	6,969	9,143	9,961
Total liabilities	113,009	5,004,899	6,210,552	951,581	2,418,481	342,400
Deferred inflows of resources:						
Leased assets	-	-	-	-	-	-
Deferred swap inflow	-	-	-	-	-	-
Total deferred inflows of resources	-	-	-	-	-	-
Net position (deficit):						
Net investment (deficit) in capital assets	448,320	(30,181)	(716,279)	4,872,495	710,132	1,711,517
Restricted	-	-	402,936	33,190	33,931	-
Unrestricted (deficit)	(102,794)	(4,889,387)	274,185	(520,729)	2,526,861	1,781,213
Total net position (deficit)	\$ 345,526	\$ (4,919,568)	\$ (39,158)	\$ 4,384,956	\$ 3,270,924	\$ 3,492,730

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Condensed Statements of Revenues, Expenses and Changes in Net Position (Deficit) Year Ended June 30, 2025

	San Antonio Housing Facility Corporation	San Antonio Housing Development Corporation	San Antonio Housing Finance Corporation	SP II Limited Partnership	O'Connor Road Limited Partnership	Refugio Street Limited Partnership
Operating revenues (expenses):						
Net tenant rental revenue	\$ 14,712,437	\$ 12,107,472	\$ -	\$ 1,217,932	\$ 1,533,935	\$ 1,848,538
Tenant revenue—other	596,047	353,479	-	3,328	6,710	22,755
HUD operating grants and housing assistance payments	578,694	46,149	-	-	-	-
Other government grants	263,418	569,835	-	-	-	232,864
Other revenue	6,902,203	174,367	45,000	3,070	11,637	98,277
Operating expenses	(39,784,421)	(15,704,489)	(17,108)	(794,590)	(973,281)	(1,876,363)
Depreciation and amortization	(2,951,358)	(2,838,500)	-	(151,319)	(215,030)	(366,612)
Total operating revenues (expenses)	(19,682,980)	(5,291,687)	27,892	278,421	363,971	(40,541)
Nonoperating revenues (expenses):						
Investment income	400,653	209,186	16,514	9,457	8,007	45,105
Interest income—leases	90,217	-	-	-	-	-
Mortgage interest income	995,058	-	-	-	-	-
Interest expense	(2,717,265)	(2,588,801)	-	(172,479)	(214,934)	(665,299)
Financing and trustee fees	(995,838)	(79,034)	-	-	-	-
Other	2,104,562	9,081,730	-	-	(48,356)	-
Total nonoperating revenues (expenses)	(122,613)	6,623,081	16,514	(163,022)	(255,283)	(620,194)
Transfers in (out)	4,688,871	8,826,943	-	-	-	-
Change in net position	(15,116,722)	10,158,337	44,406	115,399	108,688	(660,735)
Net position (deficit) at beginning of year	92,048,396	(1,682,085)	684,855	(372,006)	(566,882)	(2,921,012)
Change in reporting entity	(3,084,015)	5,778,390	-	-	-	-
Net position (deficit) at end of year	\$ 73,847,659	\$ 14,254,642	\$ 729,261	\$ (256,607)	\$ (458,194)	\$ (3,581,747)

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Condensed Statements of Revenues, Expenses and Changes in Net Position (Deficit) Year Ended June 30, 2025

	San Antonio Homeownership Opportunities Corporation	Las Varas PFC	Springhill/ Courtland Heights PFC	Woodhill PFC	Refugio Street PFC	Sendero I PFC
Operating revenues (expenses):						
Net tenant rental revenue	\$ -	\$ -	\$ 1,966,465	\$ 4,523,163	\$ -	\$ 2,117,103
Tenant revenue—other	-	-	67,611	291,111	-	173,651
HUD operating grants and housing assistance payments	-	-	1,904,442	-	-	-
Other government grants	-	-	-	-	-	-
Other revenue	129,997	4,638,386	46,683	26,495	-	45,485
Operating expenses	(230,438)	(1,552,514)	(3,146,089)	(4,612,419)	-	(1,543,988)
Depreciation and amortization	-	-	(424,981)	(1,011,519)	-	(310,261)
Total operating revenues (expenses)	(100,441)	3,085,872	414,131	(783,169)	-	481,990
Nonoperating revenues (expenses):						
Investment income	8,734	211,341	110,228	12,017	380,172	11,583
Interest income—leases	-	-	-	-	-	-
Mortgage interest income	4,293	-	-	-	152,415	-
Interest expense	-	-	(178,691)	(5,711)	-	(2,031)
Financing and trustee fees	-	-	-	-	-	-
Other	-	(4,245,759)	(20,870)	-	-	-
Total nonoperating revenues (expenses)	13,027	(4,034,418)	(89,333)	6,306	532,587	9,552
Transfers in (out)	-	1,386,018	-	-	-	-
Change in net position	(87,414)	437,472	324,798	(776,863)	532,587	491,542
Net position (deficit) at beginning of year	307,506	26,985,652	3,559,294	12,652,611	11,829,189	8,480,769
Change in reporting entity	-	-	-	-	-	-
Net position (deficit) at end of year	\$ 220,092	\$ 27,423,124	\$ 3,884,092	\$ 11,875,748	\$ 12,361,776	\$ 8,972,311

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Condensed Statements of Revenues, Expenses and Changes in Net Position (Deficit) Year Ended June 30, 2025

	Vera Cruz Redevelopment Partnership, Ltd.	Homestead Redevelopment Partnership, Ltd.	Converse Ranch, LLC	Converse Ranch II, LLC	Sunshine Plaza Apartments, Inc.	Pecan Hill Apartments, Inc.
Operating revenues (expenses):						
Net tenant rental revenue	\$ 175,353	\$ 543,818	\$ 990,948	\$ 941,609	\$ 341,705	\$ 336,040
Tenant revenue—other	1,945	98,271	22,774	9,831	2,696	72,900
HUD operating grants and housing assistance payments	-	-	-	-	735,219	772,968
Other government grants	-	-	93,742	30,554	-	-
Other revenue	605	40,463	35,604	2,228	555	-
Operating expenses	(210,439)	(845,306)	(1,004,805)	(769,589)	(741,013)	(774,158)
Depreciation and amortization	(45,664)	(21,562)	(223,550)	(209,413)	(151,173)	(142,406)
Total operating revenues (expenses)	(78,200)	(184,316)	(85,287)	5,220	187,989	265,344
Nonoperating revenues (expenses):						
Investment income	251	898	16,111	13,128	106,900	63,327
Interest income—leases	-	-	-	-	-	-
Mortgage interest income	-	-	-	-	-	-
Interest expense	(282)	(1,607)	(182,092)	(35,336)	(68,208)	-
Financing and trustee fees	-	-	-	(16,029)	-	-
Other	-	(71,719)	(1,559)	-	-	(1,149)
Total nonoperating revenues (expenses)	(31)	(72,428)	(167,540)	(38,237)	38,692	62,178
Transfers in (out)	-	-	-	3,952,666	-	-
Change in net position	(78,231)	(256,744)	(252,827)	3,919,649	226,681	327,522
Net position (deficit) at beginning of year	423,757	(4,662,824)	213,669	465,307	3,044,243	3,165,208
Change in reporting entity	-	-	-	-	-	-
Net position (deficit) at end of year	\$ 345,526	\$ (4,919,568)	\$ (39,158)	\$ 4,384,956	\$ 3,270,924	\$ 3,492,730

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Fiduciary Component Units

Housing Authority of the City of San Antonio Employees' Money Purchase Pension Plan and Trust (the Plan)

The Plan, established in 1948, is a public retirement system authorized by section 810.001 of the Texas Government Code, and a governmental plan within the meaning of the Employee Retirement Income Security Act of 1974 (ERISA). The Plan was established as a defined contribution plan covering all regular full-time employees of the Authority who have completed one year (at least 1,000 hours) of service.

The Plan is included as a component unit since the primary government has fiduciary responsibility for the Plan and the Plan serves only the Authority's employees or retirees. The Plan's fiscal year-end is December 31, 2024.

Separately Issued Financial Statements

Separate financial statements have been issued for the following component units:

- Converse Ranch, LLC
- Springhill/Courtland Heights PFC
- Pecan Hill Apartments, Inc.
- San Antonio Housing Facility Corporation
- SP II Limited Partnership
- O'Connor Road Limited Partnership
- Refugio Street Limited Partnership
- Housing Authority of the City of San Antonio Employees' Money Purchase Pension Plan and Trust

The reports may be obtained at the Authority's administrative offices located at 818 South Flores Street, San Antonio, Texas 78204.

Limited Partnerships—Joint Ventures

Various limited partnership entities, as described below, are considered joint ventures of the component units. A joint venture is an organization that results from a contractual arrangement and that is owned, operated or governed by two or more participants as a separate and specific activity subject to joint control, in which the participants retain an ongoing financial interest or responsibility. A component unit of the Authority has contributed capital to the following partnerships:

San Juan Square, Ltd.

SAHFAC and SAHDC are partners of a 143-unit multi-family project at the San Juan Square Apartments.

Enclave Gardens, Ltd.

LVPFC and Hogan Properties Company, Inc. are co-developers of a 228-unit multi-family project at the Elan Gardens Apartments.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

The Alhambra Apartments, Ltd.

SAHFAC and NRP Alhambra, LLC are co-developers of a 140-unit multi-family project at the Alhambra Senior Apartments.

Midcrowne Senior Pavilion, LP

SAHFAC and SAHDC are partners of a 196-unit senior apartment project at the Midcrowne Pavilion Apartments.

ARDC Sutton, Ltd.

SAHFAC and Franklin Development Properties, Ltd. are co-developers of a 208-unit multi-family project at the Park at Sutton Oaks.

Component units of the Authority serve as general partner for various other limited partnerships that are listed in the schedule to Note 5. For those partnerships, the general partner was not required to make a capital contribution at inception.

Authority Programs

In addition to the operation of the above component units, the Authority operated the following programs during the current year.

Public Housing

The Authority manages and maintains 6,070 public housing rental units for eligible low-income families, seniors and people with disabilities. The rental units are located in 38 developments for families, 37 developments for seniors and disabled persons and a number of scattered site single-family homes throughout the City of San Antonio.

Section 8—Housing Assistance Payment Programs

The Housing Assistance Payment Programs provide rent subsidies for approximately 11,000 families residing in privately owned rental properties.

Not-For-Profit Programs

Section 8—Project Based Management

Section 8 Project Based Management properties provide housing to low- and moderate-income elderly and nonelderly families. These properties include: Villa de Valencia Apartments, Reagan West Apartments, Sunshine Plaza Apartments, Pecan Hill Apartments and Cottage Creek Apartments.

Other Not-For-Profit Activities

Other not-for-profit activities include the activities of various programs and corporations. These include SAHFC; San Antonio Homeownership Opportunities Corporation; Sendero I PFC; Las Varas PFC; Education Investment Foundation, Inc.; Refugio Street PFC; Central Office Building; SAHDC; SAHFAC; Woodhill PFC; Converse Ranch, LLC and the Central Office Cost Center, which is the Authority's "management company arm."

Capital Improvement Programs

HUD-Funded Capital Fund and Capital Fund Financing Programs

HUD-Funded Capital Fund and Capital Fund Financing Programs provide funds for new construction and the rehabilitation of existing housing units.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Energy Performance Contracting

Energy Performance Contracting is a capital improvement program for designing, installing, and financing energy improvement projects where the savings achieved by the project are expected to reduce energy costs of the project over the term of the agreement.

Community Development Initiatives

Resident and Opportunity Supportive Services Program

The Resident and Opportunity Supportive Services Program addresses the needs of public housing residents by providing supportive services, resident empowerment activities, and/or assisting residents in becoming economically self-sufficient. The primary focus of the program is on “welfare to work” and on independent living for the elderly and persons with disabilities.

Jobs Plus Grant

The Jobs Plus Grant is a welfare to work demonstration aimed at significantly increasing employment and income of public housing residents through intensive employment focused programs targeting every able-bodied, working-welfare recipient at a public housing development in selected cities. The initiative is also a response to new national policies, such as time-limited welfare and cuts in public housing subsidies, which endanger the ability of public housing residents to pay rent.

B. Basic Financial Statements—Fund Financial Statements

All activities of the Authority are reported as business-type activities (enterprise fund), with the exception of the Plan, which is reported as a fiduciary-type activity, since it accumulates resources for pension benefit payments to qualified Authority employees, and the resources reported in that fund are not available to support the Authority’s programs. The effect of interprogram activity has been removed from the proprietary statements. Proprietary funds are used to account for operations that are (a) financed and operated in a manner similar to private business enterprises, where the intent of the governing body is that the cost (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through fees and user charges or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred and/or net income is appropriate for capital maintenance, public policy, management control, accountability or other purposes.

C. Measurement Focus, Basis of Accounting, and Financial Statement Presentation

Measurement Focus and Basis of Accounting

The financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned, and expenses are recorded at the time liabilities are incurred, regardless of the timing of related cash flows. Grants and similar items are recognized as revenue when all eligibility requirements imposed by the grantor have been met and qualifying expenditures have occurred. When both restricted and unrestricted resources are available for use, it is the Authority’s policy to use restricted resources first, then unrestricted resources as needed.

Capital grant funds used to acquire or construct capital assets are recognized as a receivable and a capital contribution (revenues) in the period when all applicability requirements have been met.

The Plan’s financial statements are prepared using the accrual basis of accounting. Employer and Plan member contributions are recognized in the period that the contributions are due.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

Financial Statement Presentation

Proprietary funds distinguish operating revenues and expenses from nonoperating items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with a proprietary fund's principal ongoing operations. The principal operating revenues of the Authority's enterprise funds are tenant rental revenue, HUD operating grants and Housing Assistance Payments, since they are used to subsidize rents at Authority-owned properties. Operating expenses for enterprise funds include the cost of the ordinary maintenance and operation expenses, utilities, administrative expenses and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as nonoperating revenues and expenses.

D. Deposits and Investments

Authority's Deposits and Investments

For purposes of the statement of cash flows, the Authority's cash and cash equivalents are considered to be cash on hand, demand deposits, money market funds and short-term investments with original maturities of three months or less from the date of acquisition.

Portions of the Authority's cash, cash equivalents and investments are restricted by "use" limitations externally imposed by creditors, funding source agreements, or legislation. Restricted cash includes HUD Family Self-Sufficiency (FSS) escrow amounts for residents in the FSS program. Restricted cash and cash equivalents also include amounts set aside for debt service in accordance with debt covenants and funds that are only allowed to be expended for certain specified modernization and development activities.

Investments are accounted for at either amortized cost or at fair value, which is the price that would be received to sell the investment in an orderly transaction between market participants at the measurement date. Fair value of actively traded securities is determined by the reported market value of securities and mutual funds trading on national exchanges. Values of securities not actively traded are based on observable inputs of similar financial instruments or on the fair value of the underlying assets. Realized gains and losses are determined on the specific-identification method. Accrued income on investments is recorded as earned, since it is both measurable and available. Investment transactions are recorded on the settlement date.

Plan Investments

Investments in the Plan are administered by the Advisory Committee of the Plan and are held by the Frost Bank Trust Department (Trustee). Plan investments in marketable debt and equity securities are reported at fair value. Shares of registered investment companies (mutual funds) are reported at fair value based on the quoted market price of the fund, which represents the net position value of the shares held by the fund at year-end. The fair value of each fund is based on the fair value of each funds' underlying investments at the end of the reporting period. Plan interest is recorded on the accrual basis as earned, and dividends are accrued as of the ex-dividend date.

Purchases and sales of investments in the Plan are recorded on a trade-date basis and, accordingly, the related receivable and payable for any unsettled trades are recorded. At December 31, 2024, there were no unsettled trades.

Net appreciation in fair value of the Plan's assets includes the related gains and losses on sales of investments and the unrealized gains and losses (representing the change in market value).

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

E. Interprogram Receivables and Payables

The Authority pays all bills and salaries for its programs and component units through its centralized check-writing system. As a result, interprogram receivables and payables arise from interprogram and intercompany transactions and are recorded in all affected corporations in the period in which transactions are executed in the normal course of operations. Interprogram receivables, payables, and transfers between programs and component units have been eliminated in the basic financial statements.

F. Accounts Receivable

Tenant receivables, other receivables, and the allowance for doubtful accounts are shown separately on the financial statements. The allowance for doubtful accounts is established as losses are estimated to have occurred through a provision for bad debts charged to earnings. Losses are charged against the allowance when management believes the uncollectibility is confirmed. Subsequent recoveries, if any, are credited to the allowance. The allowance for doubtful accounts is evaluated on a regular basis by management and is based on historical experience and specifically-identified questionable receivables. The evaluation is inherently subjective, as it requires estimates that are susceptible to significant revision as more information becomes available.

G. Notes and Mortgages Receivable

The majority of notes and mortgages receivable are due from tax credit partnerships in which the Authority serves as the general partner. The Authority evaluates the collectibility of the notes and mortgages receivable by reviewing the financial statements of the various tax credit partnerships and preparing projections of future cash flows. It has been the Authority's experience that once the tax credits expire, the limited partners will withdraw from the partnership and the Authority will become the sole owner. If a note payable remains outstanding when a partnership becomes wholly owned by the Authority, payments may continue to be made from the partnership to the Authority, and the Authority also has the ability to modify the terms of the notes once it becomes the sole owner of the partnership. During the fiscal year, the Authority recorded a significant allowance for doubtful accounts against notes receivable from certain tax credit partnerships. This allowance reflects current expectations regarding the timing and likelihood of repayment based on updated cash flow projections and partnership-specific circumstances. Notes and mortgages receivable are presented gross on the statement of net position, with the related allowance for doubtful accounts reported as a separate reduction line item. A schedule of notes and mortgages receivable is provided in Note 3 to the financial statements.

H. Other Assets and Developer Fees Receivable

The Authority has several developer fees receivable from various tax credit partnerships. The developer fees generally include repayment terms based on excess cash flows from the developed property, which makes estimates of any potential allowance for uncollectible amounts difficult. The Authority evaluates the collectibility of these receivables on an annual basis using several methods, which include reading the developments' financial statements and projecting estimated cash flows to future periods, among others. As part of this process, the Authority compares the previous-year projections to the current-year collections in order to assure the allowance for uncollectible amounts is reasonable and reflects the latest cash flow trends. For additional information, see Note 5 to the financial statements.

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

I. Restricted Assets

Certain proceeds of the Authority’s enterprise fund debts, as well as certain resources set aside for their repayment, are classified as restricted assets on the statement of net position because the repayment funds are maintained in separate bank accounts and/or maintained by trustees, as established by indenture agreements. The use of these funds is limited by third parties. The restricted investments include restricted assets to be used for the replacement of property and for other project expenditures or are held in escrow for families who successfully fulfill the FSS program requirements.

J. Capital Assets

On January 28, 2019, the Authority amended its capitalization policy and adopted new thresholds to determine an asset’s eligibility for capitalization and applied it prospectively. Based on the amendment, furniture, equipment and machinery that exceed \$5,000 and buildings and improvements, which are purchased or constructed, that exceed \$50,000, and have useful lives of more than one year are capitalized at cost or estimated cost if historical cost is not available. Donated capital assets are recorded at the acquisition value at the time of donation. The cost of site and building improvements that add value to the asset or materially extend the asset’s life are capitalized. The cost of normal maintenance and repairs that do not add to the value of the asset or materially extend the asset’s life are not capitalized.

Depreciation on all exhaustible capital assets of the Authority is charged as an expense with accumulated depreciation being reported on the statement of net position. Depreciation is generally recorded on the straight-line basis over the estimated life of the assets. The estimated useful lives are as follows:

Buildings and leasehold improvements	10-40 years
Furniture, equipment and machinery	3-10 years

K. Compensated Absences

Paid Time Off (PTO)

The PTO policy is included in the Authority’s Personnel Procedures Handbook. Under the current policy, PTO accrues for regular full-time employees upon employment, at a rate of 15 to 25 days annually, depending upon years of service, but cannot be used prior to six months of service. Employees must complete one year of service in order to be paid PTO upon termination. Effective December 20, 2014, the maximum PTO hours an employee can carry increased from 360 hours to 440 hours.

As of June 30, 2025, accrued compensated absences included a current portion of PTO totaling \$1,998,558 and a long-term portion of PTO totaling \$267,591.

L. Capital Contributions

Capital contributions consist of funds received through various grants to assist in the acquisition or construction of capital assets. A major portion of these contributions comes from the Public Housing Capital Fund Program.

M. Net Position

Net position is classified into three components:

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

- **Net investment in capital assets**—This component of net position consists of capital assets, including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.
- **Restricted net position**—This component of net position consists of external constraints placed on net position used by creditors (such as through debt covenants), grantors, contributors, or laws or regulations of other governments, or constraints imposed by law through constitutional provisions or enabling legislation.
- **Unrestricted net position**—This component of net position consists of net position that does not meet the definition of “net investment in capital assets” or “restricted net position.” These funds are available to use for any lawful and prudent purpose of the Authority.

N. Use of Estimates

The preparation of financial statements in accordance with U.S. GAAP requires management to make estimates and assumptions. This will affect the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from these estimates.

O. Restricted and Unrestricted Resources

Under the terms of grant agreements, the Authority funds certain programs by a combination of specific cost-reimbursement grants and general revenues. Therefore, when program expenses are incurred, there are both restricted and unrestricted resources available to finance the program. It is the Authority's policy to first apply cost-reimbursement grant resources to such programs and then operating revenues.

P. Equity in Partnership Investments

Investments by certain component units in limited partnerships are accounted for as equity investments. The component units of the Authority recognize their share of the operating results of the limited partnerships based on their ownership share of the limited partnerships and the partnership agreements. Under this method, the investment is initially recorded at cost and then increased or decreased by the proportionate share of the partnerships' net earnings or losses. The Authority is not obligated to fund capital deficits; therefore, any total capital deficits related to the Authority are only recognized to the extent of the Authority's contributed capital. A schedule of equity in partnership investments is provided in Note 7.

Q. Deferred Outflows/Inflows of Resources

In addition to assets, the statement of net position will report a separate section for deferred outflows of resources. This separate financial statement element represents a consumption of net position that applies to a future period(s) and so will not be recognized as an outflow of resources (expense) until then. The Authority has two items that qualify for reporting in this category, which are deferred charges on refunding and deferred swap outflows. A deferred charge on refunding results from the difference in the carrying value of refunded debt and the re-acquisition price. Each deferred charge is amortized as a component of interest expense over the remaining life of the old debt or the life of the new debt, whichever is shorter. The deferred swap outflows are described in a subsequent paragraph.

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 1. Summary of Significant Accounting Policies (Continued)

In addition to liabilities, the statement of net position will report a separate section for deferred inflows of resources. This separate financial statement element represents an acquisition of net position that applies to a future period(s) and so will not be recognized as an inflow of resources (revenue) until then. The Authority has two items that qualify for reporting in this category, which are leased assets and deferred swap inflows. The leased assets are composed of various ground and rooftop leases described in Note 4 and prepaid ground leases described in Note 9.

The deferred swap outflows and inflows mentioned previously are recognized in accordance with GASB Statement No. 53, *Accounting and Financial Reporting for Derivative Instruments*. The Authority recognizes the fair value of the swap agreements as either an asset or liability on its statement of net position with the offsetting gain or loss as either a deferred inflow or outflow of resources, if deemed an effective hedge. The Authority has applied the synthetic instrument method to determine its swap agreements constitute effective cash flow hedges.

As of June 30, 2025, the Authority's deferred outflows and inflows were as follows:

Deferred charges on refunding:	
Converse Ranch I, LLC	\$ 133,259
SAHFC Elan Gardens LLC	742,730
Total deferred charges on refunding	<u>875,989</u>
Deferred swap outflows:	
Midcrown Senior Pavilion	197,085
The Ravello Apartments	142,243
Total deferred swap outflows	<u>339,328</u>
Total deferred outflows of resources	<u>\$ 1,215,317</u>
Leased assets	\$ 67,410,349
Deferred swap inflows:	
San Antonio Housing Facility Corporation (Burning Tree and Encanta Villa)	62,958
Springhill/Courtland Heights PFC	63,523
Total deferred swap inflows	<u>126,481</u>
Total deferred inflows of resources	<u>\$ 67,536,830</u>

R. Unearned Revenue

Current unearned revenue consists of prepaid tenant rent of \$645,495, HUD Housing Choice Vouchers grant revenue of \$592,556 and other unearned revenue of \$29,868.

S. Leases Receivable

Leases receivable are measured at the present value of the lease payments expected to be received during the lease term. Management concluded the discount rates implicit in the lease contracts could not be readily determined. Therefore, management elected to utilize the Authority's incremental borrowing rate at the commencement date of each lease in order to determine the present value of each lease receivable.

T. Regulated Leases

The Authority is a lessor of residential dwelling units under regulated leases as defined by GASB 87 and as such recognizes rental revenue in accordance with the terms of the lease contract. The leases which are twelve months in length are regulated by HUD as to rent, unit size, household composition, and tenant income. For the year ended June 30, 2025, rental revenue earned under the aforementioned leases totaled \$49,674,914.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 2. Cash, Cash Equivalents, and Investments

A. Cash, Cash Equivalents, and Investments

Cash, cash equivalents, and investments as of June 30, 2025, are classified in the accompanying financial statements as follows:

Unrestricted:

Cash and cash equivalents	\$ 44,722,635
Tenant security deposits	381,382

Restricted:

Cash and cash equivalents—modernization and development	13,124,732
Cash and cash equivalents—payment of current liabilities	2,546,600
Cash and cash equivalents—held by lender, trustee, and escrow agent	6,491,560
Cash and cash equivalents—other	26,474,239
Total cash, cash equivalents, and investments	<u>\$ 93,741,148</u>

Cash, cash equivalents, and investments as of June 30, 2025, consist of the following:

Petty cash	\$ 650
Deposits with financial institutions	86,769,982
Funds held by lender, trustee, and escrow agent	6,970,516
Total cash, cash equivalents, and investments	<u>\$ 93,741,148</u>

Investments Authorized by the Authority

Investment types that are authorized by the Authority include direct obligations of the federal government backed by the full faith and credit of the United States, including United States Treasury bills, notes and bonds; obligations of federal government agencies; securities of government-sponsored agencies; various types of deposits, demand and sweep accounts and certificates of deposit (CDs); municipal depository funds; certain types of repurchase agreements; certain separate trading of registered interest and principal securities and certain types of mutual fund investments. Each authorized investment has a maximum maturity of three years, a maximum portfolio percentage of 50% and is limited to a maximum investment of 50% in any one issuer. None of the specified limits have been exceeded. In addition, the Authority does not hold any unauthorized investments.

Investments Authorized by Debt Agreements

Investments of debt proceeds held by bond trustees are governed by the provisions of debt agreements of the Authority. The investment types authorized by the Authority's debt agreements include direct obligations of the federal government, including United States Treasury bills, notes and bonds; bonds, debentures, participation certificates or notes of the Government National Mortgage Association (GNMA); bonds, debentures, participation certificates or notes of certain government-sponsored agencies; direct and general obligation of any state of the United States of America or any municipality or political subdivision of such state; corporate obligations; negotiable or nonnegotiable CDs, time deposits or other similar banking arrangements with national or state chartered banks; certain types of mutual funds or money market funds; certain types of repurchase agreements; certain types of commercial paper of finance companies; certain types of investment agreements and certain types of tax-exempt obligations.

The maximum maturity, maximum portfolio percentage and maximum investment in any one issuer are not limited, except for authorized types of commercial paper of finance companies and certain investment contracts, which are limited to a maximum maturity of 270 days. None of the specified limits have been exceeded, and the Authority held no unauthorized investments.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 2. Cash, Cash Equivalents, and Investments (Continued)

Investments Held by Lenders

Investment of funds held by lenders are governed by provisions of the debt agreements and HUD provisions for project accounts, rather than the investment requirements of the Public Funds Investment Act (PFIA). The Authority has replacement and residual reserve accounts that are held by the lender. Investing is performed in accordance with investment policies set forth by HUD. The mortgage company may invest funds in excess of \$250,000 in institutions under the control of, and whose deposits are insured by, the Federal Deposit Insurance Corporation, National Credit Union Association or other United States government insurance corporations under the following conditions:

- Mortgage companies must determine the institution has a rating consistent at all times with current minimally acceptable ratings as established and published by GNMA.
- Mortgage companies must monitor the institution's ratings no less than on a quarterly basis and change institutions when necessary. The mortgage companies must document the ratings of the institutions where the funds are deposited and maintain the documentation in the administrative record for three years, including the current year.

If the mortgage company does not perform the required quarterly review of the institutions where there are deposits in excess of \$250,000, and does not maintain the funds in an institution with a rating consistent with minimally acceptable ratings, as established and published by GNMA, and the institution fails, the mortgage company is held responsible for replacing any lost funds. HUD will seek all available remedies to recover whatever funds are lost as a result of the failed institution.

Required accounts that are held by the lender include project, residual receipts reserve and replacement reserve accounts that are not limited as to maximum maturity, maximum percentage of portfolio or maximum investment in any one issuer.

Fair Value Classification

The Authority categorizes its fair value measurements within the fair value hierarchy established by U.S. GAAP. The hierarchy is based on the valuation inputs used to measure the fair value of the asset.

Level 1 inputs are quoted prices in active markets for identical assets; Level 2 inputs are significant other observable inputs and Level 3 inputs are significant unobservable inputs.

The Authority has investments in money market funds held with its bond trustee of \$957,318 that are recorded at amortized cost and has the following investments and other items requiring recurring fair value measurements as of June 30, 2025:

- **Investment derivative instruments**—Interest rate swaps resulted in an aggregate negative fair value of \$212,847 and were valued using a market approach that considers benchmark interest rates (Level 2 inputs).

Investment Risks

In accordance with GASB Statement No. 40, *Deposit and Investment Risk Disclosures*, the following information addresses the interest rate risk, credit risk, concentration of credit risk and custodial credit risk. The Authority does not hold any foreign securities; therefore, there is no foreign currency risk.

Interest Rate Risk

Interest rate risk is the risk that changes in market interest rates may adversely affect the fair value of an investment. Generally, the longer the maturity of an investment, the greater the sensitivity the investment's fair value is to changes in market interest rates. The Authority manages its exposure to

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 2. Cash, Cash Equivalents, and Investments (Continued)

interest rate risk by purchasing a combination of short-term and long-term investments and by timing cash flows from maturities so that a portion of the portfolio is maturing or coming close to maturity evenly over time, as necessary to provide the cash flow and liquidity needed for operations. The Authority does not place a limit on interest rate risk. Information about the sensitivity of the fair values of the Authority's investments to market interest rate fluctuations, including investments held by bond trustees, is provided in the following table, which shows the distribution of the Authority's investment by maturity:

Investment	Maturity Dates	Amount
Held by bond trustee:		
JPMorgan U.S. Government Money Market Fund	N/A	736,166
Allspring 100% Treasury Money Market Fund	N/A	221,152
Total investments		<u>\$ 957,318</u>

Credit Risk

Generally, credit risk is the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. This is measured by the assignment of a rating by a nationally recognized statistical rating organization. Obligations of the United States Treasury are considered risk-free. The following schedule presents the minimum ratings required by (where applicable) HUD, the Authority's investment policy, or debt agreements, and the actual ratings by Moody's as of year-end:

Investment	Amount	Investment Minimum Rating	Moody's Rating
Held by bond trustee:			
JPMorgan U.S. Government Money Market Fund	736,166	Aaa-mf	Aaa-mf
Allspring 100% Treasury Money Market Fund	221,152	Aaa-mf	Aaa-mf
Total investments	<u>\$ 957,318</u>		

Concentration of Credit Risk

The investment policy of the Authority or HUD contains no limitations on the amount that can be invested in any one issuer. There are no investments in any one issuer (other than United States Treasury securities and money market funds) that represent 5% or more of the total Authority's investments. The Authority does not place a limit on concentration of credit risk.

Depository Custodial Credit Risk

Custodial credit risk for deposits is the risk that, in the event of the failure of a depository financial institution, a government will not be able to recover its deposits or will not be able to recover collateral securities that are in the possession of an outside party. The Authority's investment policy requires all HUD-sourced funds on deposit to be fully collateralized. All non-HUD funds such as reserves and partnership funds are required to be invested in accordance with the PFIA. All collateral should conform to those investment instruments listed in PFIA. The Authority does not place a limit on custodial credit risk.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 2. Cash, Cash Equivalents, and Investments (Continued)

	Balance Reported on the Authority's Financial Statements	Balance Deposited with Financial Institutions	FDIC Insurance	Uninsured Deposits (Collateralized)	Uninsured and Uncollateralized Deposits
Demand deposits	\$ 92,775,414	\$ 93,327,961	\$ 7,147,882	\$ 82,555,046	\$ 3,625,033
Money Market Funds	957,318	878,897	-	-	878,897
United States Treasury Bills	8,416	8,416	-	8,416	-
Total bank deposits	<u>\$ 93,741,148</u>	<u>\$ 94,215,274</u>	<u>\$ 7,147,882</u>	<u>\$ 82,563,462</u>	<u>\$ 4,503,930</u>

As of June 30, 2025, \$82,563,462 of the Authority's deposits with financial institutions were fully collateralized by securities held by the pledging financial institution. Of the \$11,651,812 remaining deposits, \$7,147,882 were covered by the Federal Deposit Insurance Corporation, and \$4,503,930 were uninsured and uncollateralized and were therefore exposed to custodial credit risk.

B. The Plan's Cash, Cash Equivalents, and Investments

As of December 31, 2024, \$39,265 of the Plan's deposits with financial institutions were covered by the Federal Deposit Insurance Corporation. The \$604,834 of remaining deposits were uninsured and uncollateralized and were therefore exposed to custodial credit risk.

	Balance Reported on the Plan's Financial Statements	Balance Deposited with Financial Institutions	FDIC Insurance	Uninsured Deposits (Collateralized)	Uninsured and Uncollateralized Deposits
Money Market Funds	\$ 604,834	\$ 604,834	\$ -	\$ -	\$ 604,834
Cash and cash equivalents	39,265	39,265	39,265	-	-
Total bank deposits	<u>\$ 644,099</u>	<u>\$ 644,099</u>	<u>\$ 39,265</u>	<u>\$ -</u>	<u>\$ 604,834</u>

As of December 31, 2024, the Plan's portfolio was comprised of the following:

Description	Fair Value
Mutual funds—equity	\$ 44,537,645
Mutual funds—fixed income	20,303,013
Total investments	<u>\$ 64,840,658</u>

Investment Risks

In accordance with GASB Statement No. 40, the following disclosures address credit risk, concentration of credit risk and interest rate risk at December 31, 2024. The Plan does not hold any foreign securities; therefore, there is no foreign currency risk.

Credit Risk

Generally, credit risk is the risk that an issuer of an investment will not fulfill its obligation to the holder of the investment. This is measured by the assignment of a rating by a nationally recognized statistical rating organization. However, investments issued or explicitly guaranteed by the United States government are excluded from this requirement. The Plan's Pension Advisory Committee defines risk in the Plan's investment policy as the possibility of losing money over the rolling 10-year time horizon. Generally, Plan assets may be invested only in investment grade bonds rated BBB (or equivalent) or better. Within the context of a managed portfolio or pooled account, an individual manager may position less than investment-grade bonds on an opportunistic basis.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 2. Cash, Cash Equivalents, and Investments (Continued)

The following is the actual rating for each investment type as of December 31, 2024.

Investment Type	Fair Value	Not Rated
American Beacon AHL Target Risk R5	\$ 1,627,718	\$ 1,627,718
BlackRock Strategic Income Opportunities Portfolio Class K	5,592,623	5,592,623
Metropolitan West Total Return Bond Fund	13,082,544	13,082,544
Fidelity US Bond Index Instl Prem	128	128
Total fixed income investments	<u>\$ 20,303,013</u>	<u>\$ 20,303,013</u>

Concentration of Credit Risk

The Plan is required to disclose investments in any one issuer that represent 5% or more of the total investments. However, investments issued or explicitly guaranteed by the United States government and investments in mutual funds, external investment pools and other pooled investments are excluded from this requirement. The Plan's investment policy limits the investment in securities of any one company to 15% of the total fund, and no more than 30% of the total fund should be invested in any one industry. At December 31, 2024, there were no investments in any one issuer that represent 5% or more of total Plan investments. Additionally, the Plan did not invest more than 15% of the investment portfolio in one company or more than 30% in one industry.

Interest Rate Risk

Interest rate risk is the risk that changes in market interest rates may adversely affect the fair value of an investment. Generally, the longer the maturity of an investment, the greater the sensitivity of its fair value to changes in market interest rates. The Plan does not place a limit on the maturity of its fixed income investments.

Presented below are the investments affected by interest rate risk and their applicable weighted-average maturities as of December 31, 2024:

Investment Type	Fair Value	Percentage of Total	Weighted-Average Maturity (Years)
American Beacon AHL Target Risk R5	\$ 1,627,718	8%	4.7
BlackRock Strategic Income Opportunities Portfolio Class K	5,592,623	28%	3.7
Metropolitan West Total Return Bond Fund	13,082,544	64%	6.8
Fidelity US Bond Index Instl Prem	128	0%	5.9
Total fixed income investments	<u>\$ 20,303,013</u>	<u>100%</u>	<u>5.8</u>

Fair Value Measurement

Plan investments at fair value as of December 31, 2024, using fair value measurements are as follows:

	Total Fair Value	Level 1	Level 2	Level 3
Mutual funds—equity	\$ 44,537,645	\$ 44,537,645	\$ -	\$ -
Mutual funds—fixed income	20,303,013	20,303,013	-	-
	<u>\$ 64,840,658</u>	<u>\$ 64,840,658</u>	<u>\$ -</u>	<u>\$ -</u>

Investments classified as Level 1 of the fair value hierarchy are valued using prices quoted in active exchange markets for those securities.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 3. Notes and Mortgages Receivable

The following summarizes the notes and mortgages receivable and the related accrued interest receivable as of June 30, 2025:

	Due Within One Year	Due After One Year	Total	Allowance	Net Total
The Authority					
ARDC Sutton, Ltd.	\$ -	\$ 7,098,029	\$ 7,098,029	\$ (7,098,029)	\$ -
Durango Midrise, LP	-	19,981,662	19,981,662	(19,981,662)	-
ARDC Sutton II, Ltd.	-	1,679,769	1,679,769	(1,679,769)	-
San Juan III, Ltd.	-	4,812,557	4,812,557	(4,812,557)	-
Wheatley Family I, LP	-	1,178,900	1,178,900	(1,178,900)	-
Wheatley Senior, LP	-	145,725	145,725	(145,725)	-
Tampico Apartments, LP	-	751,775	751,775	-	751,775
Alazan Lofts Ltd.	-	1,107,450	1,107,450	-	1,107,450
Snowden Apartments, LP	-	9,844,733	9,844,733	-	9,844,733
SAHFAC					
Wheatley Family I, LP	-	11,402,807	11,402,807	(11,402,807)	-
Wheatley Family II, LP	-	4,818,987	4,818,987	(4,818,987)	-
Wheatley Senior, LP	-	6,559,659	6,559,659	(6,559,659)	-
Tampico Apartments, LP	-	736,227	736,227	-	736,227
Kitty Hawk Flats Ltd.	-	282,894	282,894	-	282,894
Snowden Apartments, LP	-	1,300,404	1,300,404	-	1,300,404
SAHFC Potranco Lender LLC	7,379	447,224	454,603	-	454,603
SAHFC Josephine Lender LLC	547,361	4,500,000	5,047,361	-	5,047,361
ARDC Sutton II, Ltd.	-	401,390	401,390	(401,390)	-
San Juan III, Ltd.	-	710,000	710,000	(710,000)	-
San Antonio Homeownership Opportunities Corporation					
Real estate sales notes	6,161	88,800	94,961	-	94,961
Las Varas PFC					
Second lien notes	-	65,106	65,106	-	65,106
Snowden Apartments, LP	-	1,324,530	1,324,530	-	1,324,530
Total	\$ 560,901	\$ 79,238,628	\$ 79,799,529	\$ (58,789,485)	\$ 21,010,044

Note 4. Leases Receivable

On March 2, 2020, the San Antonio Housing Facility Corporation, a blended component unit of the Authority, entered into a lease agreement (the “ground lease”) as a lessor of land to Culebra Commons 2019, LLC. The term of the ground lease is for 75 years, commencing on March 2, 2020 and terminating on February 28, 2095. An initial lease receivable was recorded in the amount of \$596,473. At commencement of the ground lease, an advanced rent payment of \$3,800,000 was received and administrative rent in the amount of \$25,000 is due annually. The discount rate for the ground lease is 3.98%.

On February 1, 2021, the San Antonio Housing Facility Corporation, a blended component unit of the Authority, entered into a lease agreement (the “ground lease”) as a lessor of land to 120 Josephine 2020 LLC. The term of the ground lease is for 75 years, commencing on February 1, 2021 and terminating on February 1, 2096. An initial lease receivable was recorded in the amount of \$597,680. At commencement of the ground lease, an advanced rent payment of \$11,737,024 was received and administrative rent in the amount of \$25,000 is due annually. The discount rate for the ground lease is 3.98%.

On March 31, 2022, the San Antonio Housing Facility Corporation, a blended component unit of the Authority, entered into a lease agreement (the “ground lease”) as a lessor of land to Potranco 2021 LLC. The term of the ground lease is for 75 years, commencing on March 31, 2022 and terminating on March 30, 2097. An initial lease receivable was recorded in the amount of \$534,270. At commencement of the

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 4. Leases Receivable (Continued)

ground lease, an advanced rent payment of \$1,875,000 was received and administrative rent in the amount of \$25,000 is due annually. The discount rate for the ground lease is 4.54%.

On November 21, 2017, the Authority entered into an amended and restated lease agreement (the “rooftop lease”) as a lessor of rooftop space at the Parkview Apartments to New Cingular Wireless PCS, LLC (now AT&T). The rooftop lease commenced November 21, 2017 and has an initial five-year term. The rooftop lease may be extended for three successive five-year terms. Annual rent for 2025 was \$21,480 and rent is increased annually by two percent. An initial lease receivable was recorded in the amount of \$274,565. The discount rate for the rooftop lease is 3.98%. The term includes the extensions as reasonably certain to be exercised.

On August 2, 2017, the Authority entered into an amended and restated lease agreement (the “rooftop lease”) as a lessor of rooftop space at the Fair Avenue Apartments to New Cingular Wireless PCS, LLC (now AT&T). The rooftop lease commenced January 1, 2017 and has an initial five-year term. The rooftop lease may be extended for three successive five-year terms. Annual rent for 2025 was \$21,257 and rent is increased annually by two percent. An initial lease receivable was recorded in the amount of \$249,030. The discount rate for the rooftop lease is 3.98%. The term includes the extensions as reasonably certain to be exercised.

On November 21, 2017, the Authority entered into a lease agreement (the “rooftop lease”) as a lessor of rooftop space at the San Pedro Arms Apartments to Sprint Spectrum Realty Company, LLC (now T-Mobile). The rooftop lease commenced January 1, 2017 and has an initial five-year term. The rooftop lease may be extended for three successive five-year terms. Annual rent for 2025 was \$25,777 and rent is increased annually by two percent. An initial lease receivable was recorded in the amount of \$311,819. The discount rate for the rooftop lease is 3.98%. The term includes the extensions as reasonably certain to be exercised.

On March 25, 2022, the Authority entered into a lease agreement (the “rooftop lease”) as a lessor of rooftop space at the Victoria Plaza Apartments to Cellco Partnership (d/b/a Verizon Wireless). The rooftop lease commenced March 25, 2022 and has an initial five-year term. The rooftop lease may be extended for three successive five-year terms. Annual rent for 2025 was \$28,844 and rent is increased annually by two percent. An initial lease receivable was recorded in the amount of \$431,233. The discount rate for the rooftop lease is 4.54%. The term includes the extensions as reasonably certain to be exercised.

On November 20, 2023, the Authority entered into a lease agreement (the “rooftop lease”) as a lessor of rooftop space at the Villa Tranchese Apartments to T-Mobile West LLC. The rooftop lease commenced November 20, 2023 and has an initial five-year term. The rooftop lease may be extended for three successive five-year terms. Annual rent for 2025 was \$27,540 and rent is increased annually by two percent. An initial lease receivable was recorded in the amount of \$399,705. The discount rate for the rooftop lease is 5.30%. The term includes the extensions as reasonably certain to be exercised.

On September 1, 2022, the Authority entered into a lease agreement (the “Mirasol lease”) as a lessor of the Mirasol Child Development Center to AVANCE – San Antonio, Inc. The Mirasol lease commenced September 1, 2022 and has a five-year term. Annual rent for 2025 was \$63,648. An initial lease receivable was recorded in the amount of \$281,075. The discount rate for the Mirasol lease is 4.38%.

On January 1, 2023, the Authority entered into a lease agreement (the “Brooklyn lease”) as a lessor of vacant land at 550 Brooklyn Street to the San Antonio River Authority. The Brooklyn lease commenced January 1, 2023 and has an initial one-year term. The Brooklyn lease may be extended for four successive one-year terms. Annual rent for 2025 was \$15,000. An initial lease receivable was recorded

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 4. Leases Receivable (Continued)

in the amount of \$54,674. The discount rate for the Brooklyn lease is 5.01%. The term includes the extensions as reasonably certain to be exercised.

A summary of lease-related revenue for the leases previously described is presented below:

	Year Ended June 30, 2025
Lease-related Revenue	
Lease Revenue	
Land	\$ 36,800
Rooftop	94,305
Building	57,276
Total Lease Revenue	\$ 188,381
Interest Revenue	167,217
Total	\$ 355,598

A schedule of future receipts that are included in the lease receivable, showing principal and interest receipts to maturity, is presented on the following page.

	Principal	Interest	Total Receipts
Years ending June 30:			
2026	\$ 183,384	\$ 148,664	\$ 332,048
2027	147,362	135,531	282,893
2028	87,619	129,819	217,438
2029	83,061	126,406	209,467
2030	89,372	122,785	212,157
2031-2035	553,807	549,235	1,103,042
2036-2040	423,499	427,932	851,431
2041-2045	183,746	346,553	530,299
2046-2050	51,347	323,653	375,000
2051-2055	63,102	311,898	375,000
2056-2060	77,559	297,441	375,000
2061-2065	95,343	279,657	375,000
2066-2070	117,224	257,776	375,000
2071-2075	144,149	230,851	375,000
2076-2080	177,287	197,713	375,000
2081-2085	218,079	156,921	375,000
2086-2090	268,300	106,700	375,000
2091-2095	309,308	44,858	354,166
2096-2100	25,895	1,188	27,083
Total Future Receipts	\$ 3,299,443	\$ 4,195,581	\$ 7,495,024

Note 5. Subscription-Based Information Technology Arrangements

The Authority obtains the right to use vendors' information technology software through various long-term contracts. Payments are fixed annually. The subscriptions have been recorded at the present value of the future minimum payments as of the inception dates using internal borrowing rates ranging from 4.27% to 5.93%. As of June 30, 2025, the subscription assets had a cost of \$2,425,817 and accumulated amortization of \$795,504. The total subscription liability amounted to \$1,658,436, with \$567,856 classified as current. A summary of changes in subscription assets and liabilities is presented on the following page.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 5. Subscription-Based Information Technology Arrangements (Continued)

	Beginning of Year	Additions	Subtractions	End of Year	Amounts Due Within One Year
Subscription Assets					
Electronic signature software	\$ 223,860	\$ -	\$ (223,860)	\$ -	
Enterprise application software	483,947	-	(2,040)	481,907	
Cloud-based communications software	905,647	-	(80,309)	825,338	
Property management software	915,657	46,420	-	962,077	
Rent reasonableness software	-	156,495	-	156,495	
	<u>\$ 2,529,111</u>	<u>\$ 202,915</u>	<u>\$ (306,209)</u>	<u>\$ 2,425,817</u>	
Less: Accumulated Amortization					
Electronic signature software	\$ (186,771)	\$ (37,089)	\$ 223,860	\$ -	
Enterprise application software	(13,443)	(160,579)	-	(174,022)	
Cloud-based communications software	(14,847)	(161,045)	-	(175,892)	
Property management software	(209,559)	(207,341)	-	(416,900)	
Rent reasonableness software	-	(28,690)	-	(28,690)	
	<u>\$ (424,620)</u>	<u>\$ (594,744)</u>	<u>\$ 223,860</u>	<u>\$ (795,504)</u>	
Total Subscription Assets, net	<u>\$ 2,104,491</u>	<u>\$ (391,829)</u>	<u>\$ (82,349)</u>	<u>\$ 1,630,313</u>	
Subscription Liabilities	<u>\$ 1,794,635</u>	<u>\$ 156,495</u>	<u>\$ (292,694)</u>	<u>\$ 1,658,436</u>	<u>\$ 567,856</u>

A summary of principal and interest payments for the subscription liabilities is presented below:

	Principal	Interest	Total Payments
Years ending June 30:			
2026	\$ 567,856	\$ 87,408	\$ 655,264
2027	607,137	56,654	663,791
2028	235,047	23,728	258,775
2029	248,396	12,187	260,583
Total Future Payments	<u>\$ 1,658,436</u>	<u>\$ 179,977</u>	<u>\$ 1,838,413</u>

Note 6. Other Assets and Developer Fees Receivable

At June 30, 2025, other assets and developer fees receivable totaled \$22,184,399. This amount is made up of developer fees receivable totaling \$21,601,565 and other noncurrent receivables of \$582,834. Additionally, an allowance for doubtful accounts totaling \$3,775,463 is recorded for developer fees receivable.

Note 7. Equity in Partnership Investments

Various component units of the Authority serve as the general partner of various tax credit limited partnerships in which they have contributed capital. The investments in partnerships are accounted for under the equity method. Under this method, the investment is initially recorded at cost and is then increased or decreased by the proportionate share of the partnerships' net earnings or losses. The Authority is not required to fund capital deficits; therefore, any total capital deficits related to the Authority are only recognized to the extent of the Authority's contributed capital. The general partners include SAHFAC, SAHDC, LVPFC and RSPFC. The general partners have ownership interests ranging from 0.0045% to 0.0100%.

A reconciliation of changes in the equity in partnership investments is presented on the following page.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 7. Equity in Partnership Investments (Continued)

Partnership	General Partner (GP)	GP % of Ownership	Balance at July 1, 2024	Cash Contributions From GP	Cash Distributions to GP	GP's Share of Profit (Loss)	Eliminations	Balance at June 30, 2025
1604 Lofts Ltd.	SAHFAC	0.0051%	\$ 51	\$ -	\$ -	\$ -	\$ -	\$ 51
ARDC Sutton, Ltd.	SAHFAC	0.0050%	1,499,396	-	-	(26)	-	1,499,370
Copernicus Apartments Ltd.	SAHFAC	0.0051%	51	-	-	-	-	51
Majestic SA Apartments, LP	SAHFAC	0.0100%	100	-	-	-	-	100
Midcrowne Senior Pavilion, LP	SAHFAC	0.0100%	3,618,360	-	-	-	(3,618,360)	-
San Juan Square, Ltd.	SAHFAC	0.0100%	1,462,483	-	-	-	(1,462,483)	-
The Alhambra Apartments, Ltd.	SAHFAC	0.0100%	294,461	-	-	-	(294,461)	-
Trader Flats Ltd.	SAHFAC	0.0051%	51	-	-	-	-	51
Snowden Apartments GP, LLC	SAHFAC	0.0100%	100	-	-	(77)	-	23
Enclave Gardens, Ltd.	LVPFC	0.0100%	132,668	-	-	-	(132,668)	-
Alazan Lofts, Ltd.*	SAHFAC	0.0051%	-	-	-	-	-	-
ARDC Ruiz, Ltd.*	SAHFAC	0.0050%	-	-	-	-	-	-
ARDC Sutton II, Ltd.*	SAHFAC	0.0050%	-	-	-	-	-	-
Costa Valencia, Ltd.*	SAHFAC	0.0100%	-	-	-	-	-	-
Fiesta Trails, Ltd.*	SAHFAC	0.0051%	-	-	-	-	-	-
Horizon Pointe Apartments, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
Kitty Hawk Flats, Ltd.*	SAHFAC	0.0051%	-	-	-	-	-	-
Mira Vista SA Apartments, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
New Braunfels 2 Housing, LP*	SAHFAC	0.0050%	-	-	-	-	-	-
SAHFC Arroyo Seco, LLC*	SAHFAC	0.0100%	-	-	-	-	-	-
SAHFC Marshall Meadows, LLC*	SAHFAC	0.0100%	-	-	-	-	-	-
SAHFC Mission Del Rio, LLC*	SAHFAC	0.0100%	-	-	-	-	-	-
SAHFC Port Royal, LLC*	SAHFAC	0.0100%	-	-	-	-	-	-
San Juan III, Ltd.*	SAHFAC	0.0100%	-	-	-	-	-	-
San Juan Square II, Ltd.*	SAHFAC	0.0045%	-	-	-	-	-	-
Somerset SA Apartments, LP*	SAHFAC	0.0090%	-	-	-	-	-	-
SOSA at Palo Alto, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
Tampico Apartments, Ltd.*	SAHFAC	0.0050%	-	-	-	-	-	-
Vista at Everest, LP*	SAHFAC	0.0051%	-	-	-	-	-	-
Vista at Interpark, LP*	SAHFAC	0.0051%	-	-	-	-	-	-
Watson Road Apartments Ltd.*	SAHFAC	0.0051%	-	-	-	-	-	-
Wheatley Family I, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
Wheatley Family II, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
Wheatley Senior, LP*	SAHFAC	0.0100%	-	-	-	-	-	-
ARDC Military, Ltd.*	LVPFC	0.0100%	-	-	-	-	-	-
ARDC Salado, Ltd.*	LVPFC	0.0100%	-	-	-	-	-	-
ARDC San Marcos, Ltd.*	LVPFC	0.0050%	-	-	-	-	-	-
Costa Almadena, Ltd.*	LVPFC	0.0100%	-	-	-	-	-	-
Costa Mirada, Ltd.*	LVPFC	0.0100%	-	-	-	-	-	-
Durango Midrise, LP*	LVPFC	0.0100%	-	-	-	-	-	-
Fairfield Bethel Place LP*	LVPFC	0.0100%	-	-	-	-	-	-
Fairfield Sorento LP*	LVPFC	0.0100%	-	-	-	-	-	-
The Mirabella, Ltd.*	LVPFC	0.0100%	-	-	-	-	-	-
TX Pleasanton Housing, LP*	LVPFC	0.0100%	-	-	-	-	-	-
			<u>\$ 7,007,721</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ (103)</u>	<u>\$ (5,507,972)</u>	<u>\$ 1,499,646</u>

For all partnerships marked with an asterisk, the general partner was not required to make a capital contribution at inception. Additionally, as the general partners are not required to fund capital deficits and these entities have cumulative loss positions as of June 30, 2025, the general partners have not recorded the related deficit capital positions of these partnerships, as they exceed the general partners' contributed capital.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 8. Capital Assets

The Authority's Capital Assets

Capital asset activity for the year ended June 30, 2025, for the business-type activities was as follows:

	Balance at July 1, 2024	Additions	Deletions	Transfers/ Reclass	Balance at June 30, 2025
Capital assets not being depreciated:					
Land	\$123,711,699	\$ 12,206,721	\$ (2,718,447)	\$ -	\$ 133,199,973
Construction in progress	52,549,521	33,643,454	(2,491,261)	(54,529,420)	29,172,294
Total capital assets not being depreciated	176,261,220	45,850,175	(5,209,708)	(54,529,420)	162,372,267
Capital assets being depreciated:					
Buildings and improvements	662,482,610	44,168,424	(45,100,669)	50,915,154	712,465,519
Furniture and equipment:					
Dwellings	2,750,997	1,000,898	(2,124)	1,177,350	4,927,121
Administration	8,116,163	49,076	(416,448)	1,849,129	9,597,920
Leasehold improvements	2,229,448	-	-	587,788	2,817,236
Total capital assets being depreciated	675,579,218	45,218,398	(45,519,241)	54,529,421	729,807,796
Less accumulated depreciation:					
Buildings and improvements	(464,849,407)	(40,472,998)	5,928,119	22,575,607	(476,818,679)
Furniture and equipment:					
Dwellings	(2,657,600)	(1,184,809)	2,125	-	(3,840,284)
Administration	(6,255,354)	(924,976)	385,532	21,504	(6,773,294)
Leasehold improvements	(1,215,135)	(126,056)	-	-	(1,341,191)
Total accumulated depreciation	(474,977,496)	(42,708,839)	6,315,776	22,597,111	(488,773,448)
Total capital assets being depreciated, net	200,601,722	2,509,559	(39,203,465)	77,126,532	241,034,348
Business-type activities capital assets, net	\$ 376,862,942	\$ 48,359,734	\$ (44,413,173)	\$ 22,597,112	\$ 403,406,615

Depreciation expense for the current year totaled \$18,074,226. During the year, the Authority acquired interests in various partnerships, resulting in capital assets of \$43,311,937 and accumulated depreciation of \$24,634,613 being brought forward. Accordingly, depreciation expense reflects only current-period depreciation, while additions to accumulated depreciation include both current-year depreciation and the accumulated depreciation associated with the acquired partnership interests.

Note 9. Prepaid Ground Leases

Comprising a significant portion of the deferred inflows of resources are various ground leases in which funds were provided for the purchase of land parcels which, in turn, were leased to project developments for periods ranging from 10 to 99 years. The Authority recognized the funds received for the prepaid leases as deferred inflows of resources and will amortize the prepayments over the initial periods on a straight-line basis. As of June 30, 2025, prepaid ground leases totaled \$65,536,826. The book value of the land related to the prepaid ground leases totaled \$59,966,392 as of June 30, 2025.

SAHFAC entered into 26 ground lease agreements with various limited partnerships for a period of 75 to 99 years for the lease of land to construct and operate rental projects. The limited partnerships provided a total of \$67,991,100 for the purchase of land, which is considered prepayment of annual rents for the initial periods of 75 to 99 years of the lease terms. After the end of the initial period, the limited partnerships will provide annual lease payments of \$100.

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 10. Bonds and Notes Payable

The long-term indebtedness of the Authority's business-type activities is presented as follows:

Program	Issue	Original Amount	Due Within One Year	Due After One Year	Balance Outstanding at June 30, 2025
SAHFAC					
Mortgage loan for Elan Gardens payable to Frost Bank. Term is 10 years, with final maturity June 4, 2035. The interest rate is fixed at 5.97%, with monthly principal and interest payments averaging \$63,340. The loan is secured by a deed of trust on the property.	Loan	\$ 10,500,000	\$ 127,995	\$ 10,372,005	10,500,000
Mortgage loan for Burning Tree and Encanta Villa payable to Frost Bank. Term is 10 years, with final maturity December 10, 2028. The interest rate is fixed by a swap contract at 3.935%, with monthly principal and interest payments averaging \$35,864. The loan is secured by deeds of trust on the properties.	Mortgage note	6,800,000	209,829	5,413,143	5,622,972
Mortgage loan for SP II Limited Partnership payable to ORIX Real Estate Capital, LLC DBA Lument Capital. Term is 35 years, with final maturity September 1, 2057. The interest rate is 3.84%, with monthly principal and interest payments of \$20,088. The loan is collateralized by the project.	Mortgage note	4,636,700	71,252	4,383,024	4,454,276
Mortgage loan for O'Connor Road Limited Partnership payable to ORIX Real Estate Capital, LLC DBA Lument Capital. Term is 35 years, with final maturity September 1, 2057. The interest rate is 3.84%, with monthly principal and interest payments of \$25,032. The loan is collateralized by the project.	Mortgage note	5,778,000	88,790	5,461,884	5,550,674
Mortgage loan for Refugio Street Limited Partnership payable to KeyBank National Association. Term is 35 years, with final maturity September 1, 2057. The interest rate is 4.65%, with monthly principal and interest payments of \$54,678. The loan is collateralized by the project.	Mortgage note	11,330,100	150,054	10,801,564	10,951,618
Construction loan for 100 Labor Street, LLC. The loan requires interest only payments until conversion to permanent financing. The interest rate is 2.90%. Draws are made periodically as the project is constructed. The permanent loan amount is \$40,525,900 and principal and interest payments of \$142,751 are payable beginning April 1, 2023 through maturity on March 1, 2063.	Construction loan	5,658,955	581,660	38,571,938	39,153,598
Neighborhood Stabilization Program loan for Sutton Oaks payable to the City of San Antonio. Term is 30 years, with final maturity September 30, 2039. The loan is non-interest bearing. Principal payments will be deferred for 30 years until the maturity date and thereafter are forgiven if SAHFAC remains in compliance with all terms and conditions set forth in the loan documents. The note is secured by a subordinate deed of trust on the property.	Sutton NSP note	900,000	-	900,000	900,000
		45,603,755	1,229,580	75,903,558	77,133,138
SAHDC					
Multifamily Housing Revenue Bonds, Series 2005, issued for Costa Valencia, Ltd. Term is 40 years, with final maturity June 1, 2048. The interest rate is 5.75%, with monthly principal and interest payments of \$62,774. The bonds are collateralized by the project.	Revenue Bonds— Series 2005	11,780,000	206,755	9,391,978	9,598,733
Multifamily Housing Revenue Bonds, Series 2005, issued for Clark 05 Housing, LP, operating as Rosemont at Highland Park, originally had a final maturity of October 1, 2038 and are subject to a mandatory redemption. The redemption date has been extended multiple times, most recently expired on February 20, 2026. Accordingly, the outstanding bond balance has been reclassified as current debt.	Revenue Bonds— Series 2005	13,870,000	11,267,797	-	11,267,797
Mortgage loan for San Juan Square II payable to Capital One Bank. Term is 15 years, with final maturity February 1, 2026. The interest rate is 7.4%, with monthly principal and interest payments of \$29,911. The loan is secured by a deed of trust, assignment of rents, security agreement and fixture filing.	Mortgage note	4,320,000	3,304,572	-	3,304,572
Multifamily Housing Revenue Note, Series 2023, issued for New Braunfels 2 Housing, LP ("The Ravello"). Term is 10 years, with final maturity February 14, 2033. The interest rate is fixed by a swap contract at 4.84%, with monthly principal and interest payments averaging \$63,379. The loan is secured by a deed of trust on the property.	Revenue Note— Series 2023	11,750,000	200,863	11,295,101	11,495,964
Multifamily Housing Revenue Note, Series 2023, issued for Midcrown Senior Apartments. Term is 10 years, with final maturity November 30, 2033. The interest rate is fixed by a swap contract at 4.93%, with monthly principal and interest payments averaging \$31,143. The loan is secured by a deed of trust on the property.	Revenue Note— Series 2023	5,800,000	92,762	5,569,561	5,662,323
		47,520,000	15,072,749	26,256,640	41,329,389

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 10. Bonds and Notes Payable (Continued)

Program	Issue	Original Amount	Due Within One Year	Due After One Year	Balance Outstanding at June 30, 2025
Section 8 Project Based					
Mortgage loan issued by Springhill/Courtland Heights Public Facility Corporation payable to Frost Bank. Term is 10 years, with final maturity December 6, 2026. The interest rate is fixed by a swap contract at 3.865%, with monthly principal and interest payments averaging \$31,515. The loan is secured by deeds of trust on Cottage Creek I, II, and Courtland Heights.					
	Mortgage note	6,000,000	209,041	4,257,168	4,466,209
Converse Ranch, LLC					
Mortgage loan for Converse Ranch I payable to Walker & Dunlop. Term is 40 years, with final maturity June 1, 2053. The interest rate is 2.98%, with monthly principal and interest payments of \$26,562. The loan is secured by a deed of trust on the property.					
	Mortgage note	7,443,700	140,775	5,895,330	6,036,105
Capital Fund Financing Program (CFFP)					
CFFP loan agreement dated November 9, 2006, with Fannie Mae for the accelerated renovation and rehabilitation of eight public housing developments. Term is 20 years, with final maturity February 1, 2026. The interest rate is 4.85%, with monthly principal and interest payments of \$182,721. The loan is secured with pledged Capital Grant Funds. On June 14, 2012, Fannie Mae assigned its interest in the loan and the loan agreement to Deutsche Bank National Trust Company.					
	CFFP loan	27,828,627	1,164,713	-	1,164,713
Sunshine Plaza Apartments, Inc.					
Mortgage loan for Sunshine Plaza payable to Frost Bank. Term is 10 years, with with final maturity December 30, 2030. The interest rate is fixed at 2.87%, with monthly principal and interest payments averaging \$12,212. The loan is secured by a deed of trust on the property.					
	Loan	2,600,000	81,866	2,177,874	2,259,740
Energy Performance Contract Loan					
Equipment Lease/Purchase Agreement with Banc of America Public Capital Corp. to finance the Authority's Phase II HUD Energy Performance Contract. The interest rate is 2.77%, with monthly principal and interest payments averaging \$73,959. The EPC term ends December 31, 2032.					
	Loan	9,171,558	720,679	5,937,093	6,657,772
		\$ 141,267,640	\$ 18,619,403	\$ 120,427,663	\$ 139,047,066

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 10. Bonds and Notes Payable (Continued)

The following table provides the annual principal and interest requirements of the Authority and its component units as of June 30, 2025, for long-term debt outstanding:

	Principal	Interest	Total
Years ending June 30:			
2026	\$ 18,619,403	\$ 5,285,944	\$ 23,905,347
2027	7,058,561	4,659,720	11,718,281
2028	2,930,575	4,473,200	7,403,775
2029	7,806,535	4,251,140	12,057,675
2030	2,974,923	4,057,120	7,032,043
2031-2035	37,768,585	16,904,358	54,672,943
2036-2040	10,673,706	10,139,310	20,813,016
2041-2045	11,874,160	8,038,856	19,913,016
2046-2050	12,882,010	5,524,428	18,406,438
2051-2055	12,140,842	3,341,685	15,482,527
2056-2060	9,918,750	1,340,813	11,259,563
2061-2065	4,522,577	188,194	4,710,771
Subtotal	139,170,627	68,204,768	207,375,395
Amounts to be drawn in future periods or upon refinance	(123,561)	-	(123,561)
Total	\$ 139,047,066	\$ 68,204,768	\$ 207,251,834

Long-term liability activity for the year ended June 30, 2025, was as follows:

	Balance at July 1, 2024	Additions	Reductions	Balance at June 30, 2025	Due Within One Year
Mortgages, bonds and notes	\$ 135,945,282	\$ 28,513,897	\$ 25,412,113	\$ 139,047,066	\$ 18,619,403
Compensated absences	2,376,405	2,509,912	2,620,168	2,266,149	1,998,558
	\$ 138,321,687	\$ 31,023,809	\$ 28,032,281	\$ 141,313,215	\$ 20,617,961

Note 11. Derivative Financial Instrument

Interest Rate Swaps

The Authority has four interest rate swap agreements (swaps) with one counterparty as of June 30, 2025. The objective of the agreements was to attain a synthetic fixed interest rate at a cost that was expected to be less than rates associated with fixed-rate debt. The swap agreement terms state the Authority is to make monthly fixed interest rate payments at a specified rate on a notional principal amount and in exchange receive monthly payments based upon the Secured Overnight Financing Rate (SOFR) plus a spread.

The swaps have an aggregate negative fair value of \$212,847 at June 30, 2025. The fair value was estimated using a proprietary valuation model developed by a counterparty. The swaps have been determined to constitute an effective hedge at June 30, 2025, by using the synthetic instrument method. The fair value of each swap is classified as an asset and deferred inflow of resources or as a liability and deferred outflow of resources.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 11. Derivative Financial Instrument (Continued)

The following contains the terms, fair values, and credit ratings issued by S&P Global Ratings of the swaps as of June 30, 2025:

Related Debt Issuance	Current Notional Amount	Effective Date of Swap	Fixed Rate Paid	Variable Rate Received	Fair Value	Swap Termination Date	Counterparty Credit Rating
New Braunfels 2 Housing, LP ("The Ravello")	\$ 11,495,964	2/14/2023	4.840%	87.4% of 1-month CME Term SOFR plus 1.580%	\$ (142,243)	02/14/2033	A-
Springhill/Courtland Heights PFC	4,466,209	3/1/2023	3.865%	82.4% of SOFR* plus 1.840%	63,523	12/06/2026	A-
Midcrown Senior Pavilion	5,662,323	11/30/2023	4.930%	80.4% of SOFR* plus 1.580%	(197,085)	11/30/2033	A-
SAHFAC (Burning Tree and Encanta Villa)	5,622,972	3/1/2023	3.935%	80.7% of SOFR* plus 1.560%	62,958	12/10/2028	A-
Totals	<u>\$ 27,247,468</u>				<u>\$ (212,847)</u>		

*The Secured Overnight Financing Rate (SOFR) is determined by using a weighted average of rates for the five U.S. Government Securities business days preceding each monthly reset date

Credit Risk

The Authority was exposed to credit risk on two swaps that had a positive fair value. At June 30, 2025, two swaps had an aggregate positive fair value of \$126,481 and two swaps had an aggregate negative fair value of \$339,328. The amount of \$126,481 represents the Authority's credit exposure to the related counterparty and the maximum loss that would be recognized at the reporting date if the counterparty failed to perform as contracted. Fair value is only a factor upon termination. The swaps' counterparty has guaranteed all payments and is rated A- by S&P Global Ratings. The swap agreements provide no collateral by the counterparty.

Interest Rate Risk

The swaps decrease the Authority's exposure to interest rate risk.

Basis Risk

The swaps do not expose the Authority to basis risk because the interest rates on the loans and the swaps are the same, equal to the variable rates specified in the table above.

Termination Risk

The swaps were issued pursuant to the International Swap Dealers Association Master Agreements, which include standard termination events, such as failure to pay and bankruptcy. The Authority or the counterparty may terminate an interest rate swap if the other party fails to perform under the terms of the contract. Also, if at the time of termination the swap has a negative fair value, the Authority would be liable to the counterparty for a payment equal to the swap's fair value. As of June 30, 2025, the swaps had an aggregate negative fair value of \$212,847.

Note 12. Line of Credit

SAHFAC has a revolving line of credit with Frost Bank for short-term borrowing needs. The line bears interest at the applicable prime rate, as listed in The Wall Street Journal, plus 0.25%. As of June 30, 2025, the all-in rate was 7.75%. The line of credit was renewed effective October 14, 2023, with a three-year term. During FY 2025, the Authority executed a modification increasing the maximum principal from \$3,000,000 to \$4,000,000. There were no borrowings against the line of credit at June 30, 2025.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 13. Conduit Debt

From time to time, SAHFC and LVPFC issue tax-exempt revenue bonds for the financing of residential developments for persons of low- and moderate-income families. The bonds are secured by the property financed and are payable solely from, and secured by, a pledge of rental receipts. The bonds do not constitute a debt or pledge of the faith and credit of SAHFC or LVPFC and, accordingly, have not been reported in the accompanying financial statements.

As of December 31, 2024, there were 26 series of tax-exempt revenue bonds outstanding with an aggregate principal amount payable of \$656,677,131, maturing from 2025 to 2063.

Note 14. Defined Contribution Plan

A. Plan Description

Effective June 7, 1948, the Authority established the Plan. The Plan is a defined contribution pension plan established as a public retirement system under the Texas Government Code by the Authority, the Plan Sponsor. Under the terms and provisions of the Plan, the Authority has the ability to amend the Plan. Additionally, the Plan covers all full-time employees of the Authority. The Plan was amended effective April 1, 2022. Prior to amendment, the Plan covered full-time employees who had completed one year of service. Eligible employees entered the Plan on the first day of January, April, July or October which coincides with or follows the date the eligibility requirements are met. The amendment removed the one-year service requirement and quarterly enrollments, thus eligible employees enter the Plan on the first day of the month that follows their date of hire. The Plan was amended again on October 9, 2024. In this amendment, effective for employees hired on or after November 1, 2024, any eligible employee who has completed one year of service shall be eligible to participate in the Plan. Further, an eligible employee shall become a participant effective as of the first day of the month which coincides with or next follows the date on which eligibility requirements were met. Employees who are participants in the Plan on or before November 1, 2024, shall continue to participate in the Plan. At December 31, 2024, there were 793 participants.

B. Contributions

Each year, participants must contribute 5.0% and may elect to contribute up to 100.0% of eligible compensation, using after tax dollars up to the maximum dollar limitation, as defined in the Plan. Participants may also contribute amounts representing distributions from other qualified defined benefit or defined contribution plans. The administrator directs the investment of contributions into various investment options for the Legacy Balanced Fund, in which the majority of employees continue to participate. Employees can self-direct their investments and have a choice of several other funds. The Plan may invest in common stock, preferred stock, convertible equities, corporate bonds, debentures, fixed income funds and mutual funds, among others. The employer's required contribution of \$3,817,717 and the employees' required contributions of \$1,777,422 were made to the Plan during the Plan year ended December 31, 2024. Participants are immediately vested in their voluntary contributions plus actual earnings thereon. Vesting in the remainder of their accounts is based on years of continuous service. A participant is fully vested after five years of credited service. Plan provisions and contributing requirements are established and may be amended by the Authority's Board.

C. Forfeitures

Participant forfeitures of nonvested balances will be used to reduce future employer contributions. During the Plan year ended December 31, 2024, employer contributions were reduced by \$46,293 from forfeited nonvested accounts. There were no unallocated forfeitures at December 31, 2024.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 14. Defined Contribution Plan (Continued)

D. Plan Termination

Although it has not expressed any intent to do so, the Authority has the right under the Plan to discontinue its contribution at any time and to terminate the Plan. In the event of Plan termination, participants would become 100% vested in their employer contributions.

E. Tax Status

The Plan obtained its latest determination letter dated December 12, 2013, as applicable for the restated plan executed on January 1, 2013, in which the Internal Revenue Service stated that the Plan, as then designed, was in compliance with the applicable requirements of the Internal Revenue Code (IRC) section 401(b) and that, therefore, the Plan is tax-exempt. The Plan has been amended since receiving the determination letter. However, the Plan administrator and the Plan's tax counsel believe that the Plan is currently designed and being operated in compliance with the applicable requirements of the IRC. Therefore, no provision for income taxes has been included in the Plan's financial statements.

F. Risks and Uncertainties

The Plan may invest in various types of investment securities. Investment securities, in general, are exposed to various risks, such as interest rate, credit and overall market volatility risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect participants' account balances and the amounts reported in the statement of plan net position.

Note 15. Risk Management

The Authority is exposed to various risks of loss related to torts; theft of, damage to, or destruction of assets; errors and omissions; injuries to employees and natural disasters. The Authority carries commercial insurance for all risks of loss (with the exception of workers' compensation and employee health and accident insurance.). Settled claims resulting from other risks of loss have not exceeded commercial insurance coverage in any of the past two years.

Health and Dental Insurance Plan

On August 2, 2007, the Board approved a self-funded health insurance plan and contract with Humana as the third-party administrator for health and dental insurance. The plan went into effect January 1, 2008. The contract with Humana was terminated on December 31, 2017. The Board approved a contract with Blue Cross Blue Shield of Texas (BCBS) as the third-party administrator for health and dental insurance on September 7, 2017. BCBS began serving as the third-party administrator on January 1, 2018.

In a self-funded plan, the employee payroll deductions for health and dental insurance are collected and held by the Authority in a separate bank account specifically to pay health and dental claims. The Authority makes an initial deposit with the third-party administrator to start the plan. Thereafter, the third-party administrator processes claims and makes payments directly to health care providers. The Authority transfers funds weekly to the third-party administrator to cover the prior week's claims paid. The plan provides protection for the Authority against catastrophic claims with a \$150,000 individual stop-loss and a formula driven aggregate stop-loss limit.

The actuarially determined claims liability of \$388,209 is based on the requirements of GASB Statement No. 10, as amended by GASB Statement No. 30. The liability includes provisions for medical, dental and prescription drug claim reserves for incurred, but not paid, and incurred, but not reported, claims. No allowance was made for the expense of processing run-out claims, since it is assumed any expense related to run-out claims processing would be included as current administration expenses.

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 15. Risk Management (Continued)

A reconciliation of changes in the liability for health and dental plan expenses for FY 2024 and FY 2025 is presented below:

Years ended June 30:	Liability at Beginning of Fiscal Year	Claims and Changes in Estimates in Current Year	Claim Payments	Balance at Fiscal Year-End
2024	\$ 833,987	\$ 9,850,818	\$ 9,704,380	\$ 980,425
2025	980,425	8,994,075	9,586,291	388,209

Note 16. Commitments and Contingencies

The Authority is exposed to the risk of contingent liabilities in the ordinary course of its operations. Specifically, such risks arise as a result of the Authority’s participation in various state and federal grant programs and as a result of threatened and pending litigation. Disallowed costs could result if the Authority’s expenditures made under its grants programs are found to be improper in that they violate state or federal regulations. Such disallowed costs would have to be paid back to the granting agency from the general funds of the Authority. The Authority is not aware of any costs that have been disallowed in the current year and does not anticipate any costs will be disallowed.

A. Grants

The Authority receives significant financial assistance from federal, state and local agencies in the form of grants and operating subsidies. HUD provided approximately 71% of the Authority’s revenue in the current year. The disbursement of funds received under these programs generally requires compliance with terms and conditions specified in the agreements and are subject to audit by the grantor agencies; therefore, to the extent the Authority has not complied with rules and regulations governing the grants, if any, refunds of any money received may be required. Management believes there are no significant contingent liabilities relating to compliance with grant rules and regulations.

B. Construction Contracts

The Authority entered into construction contracts for the rehabilitation of various low-income and multi-family housing projects that were in progress as of year-end. The unexpended balance of construction contracts is \$12,907,239 at June 30, 2025.

C. Environmental Remediation

The Authority’s revitalization activities for its developments are subject to extensive and evolving environmental laws and regulations. For the year ended June 30, 2025, the Authority has expended \$547,611 related to environmental remediation efforts. The annual level of future remediation expenditures is difficult to estimate due to the many uncertainties relating to conditions of individual sites, as well as uncertainties about the status of environmental laws and regulations and developments in remedial technology. Future information and developments will require the Authority to continually reassess the expected impact of these environmental matters.

D. Pending Litigation

The Authority is the subject of various claims and litigation that have arisen in the ordinary course of its operations. Management, in consultation with legal counsel, is of the opinion that the Authority’s liabilities in these cases, if decided adversely to the Authority, will not be material.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 16. Commitments and Contingencies (Continued)

E. Guarantees

SAHFAC and SAHDC are governed by Chapter 22 of the Texas Business Organizations Code, which requires each corporation to adopt bylaws, which are rules adopted to regulate or manage their actions. The initial bylaws were adopted by the Authority's Board. Per Article VII of both corporations' bylaws, the corporations shall issue obligations only upon approval of the Authority given not more than 60 days prior to the date of a proposed issue.

On December 6, 2016, SAHFAC guaranteed the payment of the 10-year, \$6,000,000 promissory note issued by Springhill/Courtland Heights PFC, an affiliated entity of SAHFAC. The note matures on December 1, 2026. In the event Springhill/Courtland Heights PFC is unable to make a payment, SAHFAC will be required to make that payment.

On December 30, 2020, SAHFAC guaranteed the payment of the 10-year, \$2,600,000 promissory note issuance of Sunshine Plaza Apartments, Inc. The note matures on December 30, 2030. In the event that Sunshine Plaza Apartments, Inc. is unable to make a payment, SAHFAC will be required to make that payment.

On November 30, 2023, SAHFAC guaranteed the payment of the 10-year, \$5,800,000 promissory note issuance of Midcrowne Senior Pavilion, LP. The note matures on November 30, 2033. In the event that Midcrowne Senior Pavilion, LP is unable to make a payment, SAHFAC will be required to make that payment.

On June 4, 2025, SAHFAC guaranteed the payment of the 10-year, \$10,500,000 promissory note issuance of SAHFC Elan Gardens, LLC. The note matures on June 4, 2035. In the event that SAHFC Elan Gardens, LLC is unable to make a payment, SAHFAC will be required to make that payment.

Note 17. Restricted Net Position

The restricted net position of the Authority consists of the following eight components:

Blended component units - lender-held escrows and reserves	\$	8,447,071
Blended component units - other restricted cash		104,953
Blended component units - program income restricted for affordable housing purposes		10,365,678
HCV restricted cash		9,895,767
Public Housing - proceeds and settlement funds		12,768,442
Public Housing - restricted for payment of CFFP loan		1,408,118
Public Housing - other restricted cash		945,448
Section 8 substantial rehabilitation - residual receipts and reserves		289,265
Total restricted net position	\$	<u>44,224,742</u>

Note 18. Related-Party Transactions

As stated in Note 1, the Authority is considered to be financially accountable to the component units, and the component units serve as the Authority's instruments to enhance its purpose to build and maintain affordable housing for low- and moderate-income families. Consequently, related transactions in the following areas occurred in the current year.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 18. Related-Party Transactions (Continued)

- Of the total notes receivable, net of allowance for doubtful accounts, \$20,849,977 is due from various partnerships that are related parties of the Authority. During the fiscal year, the Authority received payments totaling \$1,056,871 on these notes.

Note 19. Recently Issued Accounting Pronouncements

The following pronouncements will become effective in future reporting periods. The Authority's management has not determined their impact:

GASB Statement No. 103, *Financial Reporting Model Improvements*, will be effective for the Authority beginning with its fiscal year ending June 30, 2026. The objective of this statement is to improve key components of the financial reporting model to enhance its effectiveness in providing information that is essential for decision making and assessing a government's accountability.

Note 20. Acquisitions

On August 29, 2024, the Investor Limited Partner and Special Limited Partner of The Alhambra Apartments, Ltd. transferred their partnership interests to SAHDC The Alhambra, LLC for consideration of \$280,000. SAHDC The Alhambra, LLC is wholly owned by San Antonio Housing Development Corporation, a blended component unit of the Authority. At the time of the transfer, the General Partner, SAHA The Alhambra, LLC, retained a 0.01% ownership interest, and San Antonio Housing Facility Corporation, a blended component unit of the Authority, served as its sole member. The Class B Limited Partner, San Antonio Housing Development Corporation, retained a 0.99% ownership interest. The Investor Limited Partner, MMA The Alhambra, LLC, held a 98.999% ownership interest, and the Special Limited Partner, MuniMae SLP II, LLC, held a 0.001% ownership interest. As a result of the transaction, the Authority obtained control of the entity and added 140 apartment units to its Affordable Housing Communities portfolio. The transaction resulted in an adjustment to beginning net position of \$3,119,451, as the acquired assets exceeded the assumed liabilities.

On August 29, 2024, the Investor Limited Partner and Special Limited Partner of San Juan Square, Ltd. transferred their partnership interests to SAHDC San Juan, LLC for consideration of \$74,000. SAHDC San Juan, LLC is wholly owned by San Antonio Housing Development Corporation, a blended component unit of the Authority. At the time of the transfer, the General Partner, SAHA San Juan Square, LLC, retained a 0.01% ownership interest, and San Antonio Housing Facility Corporation, a blended component unit of the Authority, served as its sole member. The Class B Limited Partner, San Antonio Housing Development Corporation, retained a 0.99% ownership interest. The Investor Limited Partner, MMA San Juan, LLC, held a 98.999% ownership interest, and the Special Limited Partner, MuniMae SLP II, LLC, held a 0.001% ownership interest. As a result of the transaction, the Authority obtained control of the entity and added 143 apartment units to its Affordable Housing Communities portfolio. The transaction resulted in an adjustment to beginning net position of \$2,658,939, as the acquired assets exceeded the assumed liabilities.

On June 4, 2025, the Investor Limited Partner and Special Limited Partner of Enclave Gardens, Ltd. transferred their partnership interests to SAHFC EG, LLC for consideration of \$2,750,481. SAHFC EG, LLC is wholly owned by San Antonio Housing Facility Corporation, a blended component unit of the Authority. At the time of the transfer, the General Partner, Enclave Living GP, LLC, retained a 0.01% ownership interest, and Las Varas Public Facility Corporation, a blended component unit of the Authority, served as its sole member. The Investor Limited Partner, ORC Tax Credit Fund 28, LLC, held a 99.99% ownership interest, and the Special Limited Partner, SCDC, LLC, held a 0.00% ownership interest. As a result of the transaction, the Authority obtained control of the entity and added 228 apartment units to its Affordable Housing Communities portfolio. Concurrent with the acquisition, Enclave Gardens, Ltd. was

Housing Authority of the City of San Antonio

Notes to Financial Statements
Year Ended June 30, 2025

Note 20. Acquisitions (Continued)

converted from a limited partnership to a limited liability company named SAHFC Elan Gardens, LLC, of which San Antonio Housing Facility Corporation is the sole member. The transaction resulted in an adjustment to beginning net position of negative \$3,084,015, as the assumed liabilities exceeded the acquired assets.

Note 21. Restatement – Prior Period Adjustment

The Authority is reporting a prior period adjustment of \$315,569 to correct the Accounts receivable—tenants account balance reported in the fiscal year ended June 30, 2024. The adjustment corrects an overstatement in the prior period balance which resulted from an issue in the interface between the property management system and the general ledger which caused subsequent period charges to be recognized and recorded in the prior year.

A summary of the restated balances as of July 1, 2024 is as follows:

Net position - as previously reported	\$ 363,288,068
Restated Accounts receivable—tenants balance	<u>\$ (315,569)</u>
Net position - restated	<u><u>\$ 362,972,499</u></u>

Note 22. Subsequent Events

On September 16, 2025, Las Varas Public Facility Corporation, a blended component unit of the Authority, issued \$29,490,000 of Essential Function Housing Development Bonds, Series 2025, to finance the acquisition of Amara Apartments, a 308-unit multifamily residential property purchased the same day for approximately \$53,000,000 plus closing costs. The acquisition was funded with \$29,490,000 in bond proceeds and \$27,354,369 of MTW funds. The bonds bear interest at 4.25%, mature on October 1, 2035, and require semiannual interest payments on April 1 and October 1, beginning April 1, 2026, with debt service payable from and secured by project revenues as defined in the trust indenture.

On November 19, 2025, the General Partner, Class B Limited Partner, Investor Limited Partner, and Special Limited Partner of ARDC San Marcos, Ltd. transferred their partnership interests to SAHFC AC, LLC, which is wholly owned by San Antonio Housing Facility Corporation, a blended component unit of the Authority. The Investor Limited Partner was the only party to receive consideration, totaling \$1,531,941. Prior to the transfer, ownership interests in ARDC San Marcos, Ltd. were: the General Partner, ARDC San Marcos GP, LLC (wholly owned by San Antonio Housing Facility Corporation), 0.005%; the Class B Limited Partner, Franklin Family Investments, Ltd., 0.005%; the Investor Limited Partner, Bank of America, N.A., 99.98%; and the Special Limited Partner, Banc of America CDC Special Holding Company, Inc., 0.01%. As a result of the transfer, the Authority gained control of the entity, adding 252 apartment units to its Affordable Housing Communities portfolio. The limited partnership was subsequently converted into a limited liability company, SAHFC Artisan at Creekside, LLC. On January 7, 2026, SAHFC Artisan at Creekside, LLC obtained a 10-year, \$13,600,000 loan from Frost Bank, with a fixed interest rate of 4.94% under a swap agreement, maturing on January 7, 2036. The loan is secured by a deed of trust on the Artisan at Creekside Apartments.

Housing Authority of the City of San Antonio

Notes to Financial Statements Year Ended June 30, 2025

Note 22. Subsequent Events (Continued)

On January 21, 2026, Las Varas Public Facility Corporation, a blended component unit of the Authority, issued \$50,000,000 in Series 2026A Credit Enhanced Multifamily Housing Revenue Bonds and \$14,000,000 in Taxable Series 2026B Credit Enhanced Multifamily Housing Revenue Bonds. The proceeds of the Bonds will be loaned by Las Varas Public Facility Corporation to Central at Commerce, LP to provide construction financing for a 279-unit multifamily residential rental development to be known as Central at Commerce. Upon conversion of the Bonds from the construction phase to the permanent phase, Cedar Rapids Bank and Trust Company is expected to purchase the Series 2026A Bonds to provide a permanent loan to the partnership, and the Series 2026B Bonds are expected to be retired. The Series 2026A Bonds bear interest at 3.35%, and the Series 2026B Bonds bear interest at 4.35%. The corresponding loans to Central at Commerce, LP carry interest rates of 4.35% for the Series 2026A loan and 5.35% for the Series 2026B loan.

On February 5, 2026, the Sixth Amendment to the Purchase and Sale Agreement for Rosemont at Highland Park was executed, requiring the Authority (the seller) and LXMI Capital (the buyer) to deposit a total of \$1,000,000 with Computershare, the bond trustee, for the bond payoff scheduled for February 20, 2026. The \$250,000 from LXMI is nonrefundable and will be applied as a credit to the purchase price. On February 6, 2026, Computershare confirmed that the bond payoff date had been rescheduled to February 20, 2026. On February 19, 2026, the Authority completed a wire transfer of \$10,165,143.41 in Real Estate Services funds to pay off the bonds, meeting the February 20, 2026 deadline.

On February 19, 2026, a mandatory redemption notice was issued for the Costa Valencia Multifamily Housing Revenue Bonds, Series 2005, in accordance with the terms of the bond indenture. The bonds are subject to mandatory redemption on September 1, 2026. The bonds were originally scheduled to mature on June 1, 2048. The outstanding principal amount subject to redemption is \$9,479,569. The redemption will be effected in accordance with the provisions of the bond indenture.

The Authority has evaluated subsequent events through **February 25, 2026**, the date on which the financial statements were issued. Other than as discussed above, during this period no material subsequent events occurred which would require recognition or disclosure.

(This page intentionally left blank.)

Supplementary Information

Housing Authority of the City of San Antonio

Schedule of Modernization Costs Year Ended June 30, 2025

HUD Project Number	Approved Funds	Expended Funds	Disbursed Funds	Approved Funds Available to Expend	Expended Funds Available to be Disbursed
TX 59P006501-20	\$ 13,141,540	\$ 13,141,540	\$ 13,141,540	\$ -	\$ -
TX 59P006501-21	13,244,337	13,244,337	13,244,337	-	-
TX 59P006501-22	16,212,142	15,546,087	14,499,425	666,055	1,046,662
TX 59P006501-23	16,536,059	14,506,941	12,385,789	2,029,118	2,121,152
TX 59P006501-24	17,011,316	6,653,416	5,813,397	10,357,900	840,019
TX 59P006501-25	17,359,796	-	-	17,359,796	-
TX 59E006501-21	10,865	-	-	10,865	-
TX 59E006501-22	250,000	250,000	250,000	-	-
TX 59E006501-24	117,256	20,546	-	96,710	20,546
TX 59E006501-25	245,490	-	-	245,490	-
TX 59L006501-20	2,457,071	1,902,966	927,318	554,105	975,648
TX 59L006501-22	4,764,665	47,370	-	4,717,295	47,370
TX 59L006501-24	6,277,810	-	-	6,277,810	-
TX 59H006501-22	4,516,200	444,000	-	4,072,200	444,000
TX 59H006501-24	4,800,000	-	-	4,800,000	-
	<u>\$ 116,944,546</u>	<u>\$ 65,757,203</u>	<u>\$ 60,261,805</u>	<u>\$ 51,187,343</u>	<u>\$ 5,495,397</u>

(This page intentionally left blank.)

Compliance Section

(This page intentionally left blank.)



INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL
STATEMENTS PERFORMED IN ACCORDANCE WITH
GOVERNMENT AUDITING STANDARDS

To the Board of Commissioners of
Opportunity Home San Antonio
San Antonio, Texas

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Opportunity Home San Antonio (Opportunity Home), as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise Opportunity Home's basic financial statements, and have issued our report thereon dated February XX, 2026.

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered Opportunity Home's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Opportunity Home's internal control. Accordingly, we do not express an opinion on the effectiveness of Opportunity Home's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements, on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.



Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether Opportunity Home's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. .

However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

We noted certain matters that we reported to management of Opportunity Home in a separate letter dated February XX, 2026.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

February XX, 2026



INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

To the Board of Commissioners of
Opportunity Home San Antonio
San Antonio, Texas

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Opportunity Home San Antonio (Opportunity Home) compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of Opportunity Home's major federal programs for the year ended June 30, 2025. Opportunity Home's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, Opportunity Home complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2025.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of Opportunity Home and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of Opportunity Home's compliance with the compliance requirements referred to above.



Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to Opportunity Home's federal programs.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on Opportunity Home's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Opportunity Home's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding Opportunity Home's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of Opportunity Home's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Opportunity Home's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Other Matters

We noted certain matters that we reported to management of Opportunity Home in a separate letter dated February XX, 2026.

Report on Internal Control over Compliance

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

February XX, 2026

Housing Authority of the City of San Antonio**Schedule of Findings and Questioned Costs
Year Ended June 30, 2025**

Section I—Summary of Auditor's Results**1. Financial Statements**

Type of auditor's report issued:

Internal control over financial reporting:

Material weakness(es) identified?	<u> </u> Yes	<u> X </u> No
Significant deficiency(ies) identified?	<u> </u> Yes	<u> X </u> None Reported
Noncompliance material to financial statements noted?	<u> </u> Yes	<u> X </u> No

2. Federal Awards

Internal control over major programs:

Material weakness(es) identified?	<u> </u> Yes	<u> X </u> No
Significant deficiency(ies) identified?	<u> </u> Yes	<u> X </u> None Reported

Type of auditor's report issued on compliance for major programs:

Any audit findings disclosed that are required to be reported in accordance with the 2 CFR 200.516(a)?	<u> </u> Yes	<u> X </u> No

Identification of major programs:

CFDA Number(s)14.881
14.871, 14.879Name of Federal Program or ClusterMoving to Work Demonstration Program
Housing Voucher Cluster

Dollar threshold used to distinguish between type A and type B programs:

\$ 3,000,000

Auditee qualified as low-risk auditee?

 Yes X No

(Continued)

Housing Authority of the City of San Antonio

Schedule of Expenditures of Federal Awards Year Ended June 30, 2025

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal Assistance Listing Number	Grant Number	Expenditures	Amounts Passed Through To Subrecipients
Direct Programs				
United States Department of Housing and Urban Development:				
Section 8 Project-Based Cluster:				
Section 8 Moderate Rehabilitation	14.856	FW-4045K	\$ 1,753,637	\$ -
Total Section 8 Project-Based Cluster			1,753,637	-
Section 8 New Construction/Subs Rehab:				
Reagan West	14.182	TX59E000018	56,326	-
Total Section 8 New Construction/Subs Rehab			56,326	-
Housing Voucher Cluster:				
Section 8 Housing Choice Vouchers:				
Section 8 Veterans Affairs Supportive Housing—VASH	14.871		3,739,640	-
Emergency Housing Voucher Program	14.EHV		2,329,604	-
Section 8 Mainstream Vouchers Program	14.879	FW-4045DV	3,344,877	-
Total Housing Voucher Cluster			9,414,121	-
Moving to Work (MTW) Demonstration Program:				
MTW—Low Rent Public Housing Authority Owned Housing	14.881	FW-1247	37,459,622	-
MTW—Section 8 Housing Choice Voucher Program	14.881	FW-4045V	151,766,286	-
MTW—2020 Capital Fund Program	14.881	TX59P006501-20	1,012,388	-
MTW—2022 Capital Fund Program	14.881	TX59P006501-22	2,417,095	-
MTW—2023 Capital Fund Program	14.881	TX59P006501-23	6,259,445	-
MTW—2024 Capital Fund Program	14.881	TX59P006501-24	6,476,119	-
MTW—2022 Emergency Safety and Security Grant Program	14.881	TX59E006501-22	29,989	-
Total MTW Demonstration Program			205,420,944	-
Lead-Based Paint Capital Fund Program:				
2020 Lead-Based Paint Capital Fund Program	14.888	TX59L006501-20	1,760,416	-
2022 Lead-Based Paint Capital Fund Program	14.888	TX59L006501-22	5,120	-
2022 Housing-Related Hazards Capital Fund Program	14.888	TX59H006501-22	444,000	-
Total Lead-Based Paint Capital Fund Program			2,209,536	-
Family Self-Sufficiency Program:				
2023 HCV/PH Combined FSS Grant	14.896	TX006FSS23TX504201	560,930	-
2024 HCV/PH Combined FSS Grant	14.896	TX006FSS25TX6212	568,254	-
Total Family Self-Sufficiency Program			1,129,184	-
Resident Opportunity and Supportive Services (ROSS)—Service Coordinator Grant:				
2021 ROSS—Service Coordinator	14.870	ROSS221724	200,782	-
2024 ROSS—Service Coordinator	14.870	ROSS252123	13,398	-
Total ROSS—Service Coordinator Grant			214,180	-
Job-Plus Pilot Initiative	14.895	TX006FJP6JPH20	314,226	-
Economic Development Initiative - Community Project Funding	14.251	B-22-CP-TX-0861	2,047,680	-
Total United States Department of Housing and Urban Development			222,559,834	-

(Continued)

Housing Authority of the City of San Antonio

Schedule of Expenditures of Federal Awards Year Ended June 30, 2025

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal Assistance Listing Number	Grant Number	Expenditures	Amounts Passed Through To Subrecipients
Pass-Through Programs				
United States Department of Housing and Urban Development:				
Texas Department of Housing and Community Affairs				
Project Rental Assistance Demonstration (PRA Demo) Program of				
Section 811 Supportive Housing for Persons with Disabilities	14.326	TX59RDD1903	46,149	-
Total United States Department of Housing and Urban			46,149	-
Development				
United States Department of Transportation:				
VIA Metropolitan Transit Authority Grant				
Transit Services Program Cluster				
Enhanced Mobility of Seniors and Individuals with Disabilities	20.513	TX-2021-010-00	3,575	-
Total Transit Services Program Cluster			3,575	-
Total United States Department of Transportation			3,575	-
Total Federal Financial Assistance			\$ 222,609,558	\$ -

See notes to schedule of expenditures of federal awards.

Housing Authority of the City of San Antonio

Notes to Schedule of Expenditures of Federal Awards

Year Ended June 30, 2025

Note 1. Basis of presentation

The accompanying Schedule of Expenditures of Federal Awards (SEFA) includes the federal grant activity of the Authority and is presented on the accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements.

Note 2. Summary of Significant Accounting Policies

Expenditures reported in the SEFA are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

Subrecipients: There were no subrecipients in the current year.

Low-rent expenditures represent the current-year operating subsidy from HUD.

Section 8 Program expenditures represent the current year earned annual contribution from HUD.

De minimis election: The Authority has elected not to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

A reconciliation of the SEFA to the statement of revenues, expenses and changes in net position for the year ended June 30, 2025, is as follows:

Total federal financial assistance per SEFA	<u>\$ 222,609,558</u>
A. Federal assistance per statement of revenues, expenses and changes in net position:	
HUD operating subsidy and grant revenue	\$ 214,514,097
Other government grants	3,575
Capital contributions	14,164,295
B. Less grant revenue for multifamily properties separately reported to REAC:	
a. Sunshine Plaza—HUD Project No. 115-94026	(735,219)
b. Pecan Hill—HUD Project No. 115-94027	(772,968)
c. Springhill I PFC—HUD Grant No. TX59E000035	(954,751)
d. Springhill II PFC—HUD Grant No. TX59E000036	(949,691)
e. 100 Labor Apartments—HUD Grant No. TX598023003	(578,694)
C. Less FY 2025 Capital Fund Financing Program principal payments	<u>(2,081,086)</u>
	<u>\$ 222,609,558</u>

(This page intentionally left blank.)



OPPORTUNITY HOME SAN ANTONIO
San Antonio, Texas

AUDIT SUMMARY

For the Year Ended June 30, 2025

OPPORTUNITY HOME SAN ANTONIO

2025 Audit Summary

Financial Statements and Auditor's Reports

1. Audit Scope

- Includes Opportunity Home and blended CU's
- Separate audits performed:

Entity	Type	Date Completed
SAH Facility Corporation	GAS	February 2026
Springhill/Courtland Heights PFC	Uniform Guidance	January 2026
Pecan Hill Apartments, Inc.	Uniform Guidance	January 2026
Refugio Street, LP	HUD	September 2025
O'Connor Road, LP	HUD	September 2025
Converse Ranch, LLC	HUD	September 2025
SP II, LP	HUD	September 2025
Money Purchase Pension Plan (fiduciary fund)	-	-

2. Auditor's Report – Financial Statements

- *Unmodified Opinion on Primary Government*
 - o Fairly Presented *In All Material Respects* (Reasonable...not Absolute Assurance)
 - o Emphasis of matter - \$58.8 million in notes & interest receivable deemed uncollectible

3. Auditor's Report – Compliance and Internal Control

- Internal Control Over Financial Reporting and Compliance and Other Matters in Accordance with *Government Auditing Standards*
 - o No Material Weaknesses in internal control over financial reporting
 - o No Significant Deficiencies
 - o No Noncompliance Required to be Reported in FS
- Compliance on Each Major Program and on Internal Control Over Compliance in Accordance with *Uniform Guidance*
 - o Unmodified opinion
 - o No Material Weaknesses

4. Major Programs:

- 14.881 Moving-To-Work
- 14.871 / 14.879 Section 8 Housing Choice Vouchers / Mainstream Vouchers
- Opportunity Home was not considered a low risk auditee.
- No Findings reported in Schedule of Findings and Questioned Costs

OPPORTUNITY HOME SAN ANTONIO

2025 Audit Summary

5. Other Procedures Performed

- Opportunity Home PHA REAC Submission Certification
- REAC Multifamily Submissions for Springhill/Courtland Heights, Pecan Hill, Refugio St. LP, O'Connor Road LP, Converse Ranch, and SP II.
- Data Collection Form – preparation and certification

Audit Communication Letter

1. Difficulties Encountered in Performing the Audit – None
2. The financial statements are the responsibility of management, including the selection and use of appropriate accounting policies and estimates.
3. Disagreements with management – None
4. Significant estimates – Depreciation expense, allowance for uncollectible, leases and SBITA right-to-use assets
5. Audit Adjustments – Proposed an adjustment to reclassify construction in progress and recognize additional depreciation of \$972,293. There were no uncorrected misstatements.
6. Control Recommendations and Compliance with Federal Requirements
 - a) HCV Eligibility
 - o Various instances where incorrect information was used to compute HAP, and required documentation was not retained.
 - o Seven instances where a unit was not reinspected within 24 hours for a life-threatening deficiency.
 - b) Public Housing Eligibility
 - o 26 instances where an annual inspection not performed timely and 2 units where no inspection was performed when required.
 - o Six instances where EIV documentation was missing.
 - o Various instances where documentation was missing or resulted in incorrect calculation of assistance.
 - c) Payroll – Salary Allocation
 - o Three employee's pay was allocated to various properties, including federally subsidized, but did not have supporting documentation.
 - d) Housing Quality Standards / NSPIRE Inspections
 - o 12 failed inspections for life threatening deficiencies were not timely reinspected. On average, units were reinspected after 21 days.

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026****BOARD OF COMMISSIONERS
Regular Board Meeting**

RESOLUTION 6911 AUTHORIZING THE HEMISVIEW VILLAGE APARTMENTS DEBT PAYOFF AND LIMITED PARTNER INTEREST ACQUISITION, INCLUDING THE EXPENDITURE OF MOVING TO WORK FUNDS AND/OR ANY OTHER AVAILABLE RESTRICTED OR NON-RESTRICTED FUNDS IN AN AMOUNT OF APPROXIMATELY \$17,000,000; AUTHORIZING SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE RESOLUTION 26FAC-03-01 AUTHORIZING THE FORMATION OF A SINGLE MEMBER LIMITED LIABILITY COMPANY TO ACQUIRE ALL OWNERSHIP INTERESTS OF DURANGO MIDRISE, LP, AND ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE MEMBER LIMITED LIABILITY COMPANY; AUTHORIZING LAS VARAS PUBLIC FACILITY CORPORATION TO APPROVE RESOLUTION 26LVPFC-03-01 AUTHORIZING CERTAIN ACTIONS REQUIRED IN CONNECTION WITH THE DEBT PAYOFF AND ACQUISITION; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTIONS; AND OTHER MATTERS IN CONNECTION THEREWITH

Signed by:


Michael Reyes

President and CEO

Bradford McMurray

Chief Asset Management Officer

REQUESTED ACTION:

Consideration and approval regarding Resolution 6911, authorizing the Hemisview Village Apartments debt payoff and limited partner interest acquisition, including the expenditure of Moving To Work funds and/or any other available restricted or non-restricted funds in an amount of approximately \$17,000,000; authorizing San Antonio Housing Facility Corporation to approve Resolution 26FAC-03-01 authorizing the formation of a single member limited liability company to acquire all ownership interests of Durango Midrise, LP, and all actions necessary to convert such partnership to a single member limited liability company; authorizing Las Varas Public Facility Corporation to approve Resolution 26LVPFC-03-01 authorizing certain actions required in connection with the debt payoff and acquisition; the execution of all documentation necessary to carry out the transactions; and other matters in connection therewith.

SUMMARY:

The Project is located at 401 Santos Street, San Antonio, Texas, comprising 245 units, including 184 market-rate units and 61 units (49 of which are public housing units) reserved for individuals and families earning at or below 50% AMI. The federal compliance period ended in 2025, and the extended affordability period ends in 2040.

The Project was financed, in part, with the proceeds of (i) the San Antonio Housing Finance Corporation (the "2008 Issuer") Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008 (the "2008 Bonds"), originally issued in the aggregate principal amount of \$18,500,000 and currently outstanding in the aggregate principal amount of approximately \$14,300,000. The 2008 Bonds were issued pursuant to an Indenture of Trust, dated as of September 1, 2008, by and between the 2008 Issuer and Wells Fargo Bank, National

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

Association, as trustee. The proceeds of the 2008 Bonds were loaned to the Partnership pursuant to a Loan Agreement, dated as of September 1, 2008, among the 2008 Issuer, Capital One, National Association, as bondholder representative, and the Partnership, and a promissory note made by the Partnership for the benefit of the 2008 Issuer (the “2008 Bond Note”). The Partnership seeks to exercise its option to prepay the 2008 Bond Note, redeem the 2008 Bonds prior to maturity, and pay costs related thereto (the “Payoff”) using the proceeds of a disbursement of the MTW funds and/or any other available restricted or non-restricted funds by Opportunity Home.

The Project is owned by the Partnership, which is currently comprised of Durango Midrise GP, LLC, a Texas limited liability company of which LVPFC is sole member, as general partner (the “General Partner”), Alliant Tax Credit Fund 50, Ltd., as investor limited partner (“ILP”), Alliant ALP 50, LLC, as administrative limited partner (the “ALP”), Alliant Holdings of Durango, LLC, as special limited partner (“SLP”), and Carleton Durango, LLC, as Class B limited partner (“Class B LP”). SAHFC, through the Component Entity, desires to purchase and assume the ILP, ALP, SLP, and Class B LP interests in the Partnership (collectively, the “Transfer”) using the proceeds of a disbursement of the MTW funds and/or any other available restricted or non-restricted funds by Opportunity Home. Following the Transfer, the Partnership shall be converted into a single-member limited liability company (the “Partnership Conversion”).

In connection with the Payoff, the Transfer, and/or the Partnership Conversion, the Authority, the Partnership, the Component Entity, SAHFC, and LVPFC will be required to enter into certain agreements, including, but not limited to, an assignment and assumption agreement, an amended and restated limited partnership agreement, and an amendment to, or termination of, the existing ground lease.

CONTRACT OVERSIGHT:

Bradford McMurray, Chief Asset Management Officer

STRATEGIC OUTCOMES:

Residents have a sufficient supply of affordable housing options.
Residents live in quality, affordable housing.

ATTACHMENTS:

Resolution 6911
Resolution 26LVPFC-03-01
Resolution 26FAC-03-01
Resolution 26RSPFC-03-01
Slides

**CERTIFICATE FOR RESOLUTION
RESOLUTION 6911**

The undersigned officer, San Antonio Housing Authority a/k/a Opportunity Home San Antonio of the City of San Antonio, Texas (the "Authority"), hereby certifies as follows:

1. In accordance with the bylaws of the Authority, the Board of Commissioners of the Authority (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 6911 AUTHORIZING THE HEMISVIEW VILLAGE APARTMENTS DEBT PAYOFF AND LIMITED PARTNER INTEREST ACQUISITION, INCLUDING THE EXPENDITURE OF MOVING TO WORK FUNDS AND/OR ANY OTHER AVAILABLE RESTRICTED OR NON RESTRICTED FUNDS IN AN AMOUNT OF APPROXIMATELY \$17,000,000; AUTHORIZING SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE RESOLUTION 26FAC-03-01 AUTHORIZING THE FORMATION OF A SINGLE MEMBER LIMITED LIABILITY COMPANY TO ACQUIRE ALL OWNERSHIP INTERESTS OF DURANGO MIDRISE, LP, AND ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE MEMBER LIMITED LIABILITY COMPANY; AUTHORIZING LAS VARAS PUBLIC FACILITY CORPORATION TO APPROVE RESOLUTION 26LVPFC-03-01 AUTHORIZING CERTAIN ACTIONS REQUIRED IN CONNECTION WITH THE DEBT PAYOFF AND LIMITED PARTNER INTEREST ACQUISITION; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTIONS; AND OTHER MATTERS IN CONNECTION THEREWITH

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Bylaws of the Authority.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
President and CEO

**Opportunity Home San Antonio
Resolution 6911**

RESOLUTION 6911 AUTHORIZING THE HEMISVIEW VILLAGE APARTMENTS DEBT PAYOFF AND LIMITED PARTNER INTEREST ACQUISITION, INCLUDING THE EXPENDITURE OF MOVING TO WORK FUNDS AND/OR ANY OTHER AVAILABLE RESTRICTED OR NON RESTRICTED FUNDS IN AN AMOUNT OF APPROXIMATELY \$17,000,000; AUTHORIZING SAN ANTONIO HOUSING FACILITY CORPORATION TO APPROVE RESOLUTION 26FAC-03-01 AUTHORIZING THE FORMATION OF A SINGLE MEMBER LIMITED LIABILITY COMPANY TO ACQUIRE ALL OWNERSHIP INTERESTS OF DURANGO MIDRISE, LP, AND ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE MEMBER LIMITED LIABILITY COMPANY; AUTHORIZING LAS VARAS PUBLIC FACILITY CORPORATION TO APPROVE RESOLUTION 26LVPFC-03-01 AUTHORIZING CERTAIN ACTIONS REQUIRED IN CONNECTION WITH THE DEBT PAYOFF AND ACQUISITION; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT THE TRANSACTIONS; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Texas Public Facility Corporation Act, Chapter 303, Texas Local Government Code, as amended (the “Act”), provides that certain non-profit corporations created by housing authorities shall constitute public facility corporations which are public corporations, constituted authorities, and instrumentalities authorized by the applicable housing authority; and

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio (the “Authority”) approved and created Las Varas Public Facility Corporation (“LVPFC”) and San Antonio Housing Facility Corporation (“SAHFC”) pursuant to and in accordance with the provisions of the Act; and

WHEREAS, LVPFC is the sole member of Durango Midrise GP, LLC, a Texas limited liability company, the general partner (the “General Partner”) of Durango Midrise LP, a Texas limited partnership (the “Partnership”), the leasehold owner of the land and fee owner of the improvements comprising the Hemisview Village (formerly Durango Midrise) Apartments Project (the “Project”); and

WHEREAS, the Partnership is comprised of the General Partner, Alliant Tax Credit Fund 50, Ltd., as investor limited partner (“ILP”), Alliant ALP 50, LLC, as administrative limited partner (the “ALP”), Alliant Holdings of Durango, LLC, as special limited partner (“SLP”), and Carleton Durango, LLC, as Class B limited partner (“Class B LP,” and with the ILP, ALP, and SLP the “Limited Partners”); and

WHEREAS, SAHFC seeks to form a single-member limited liability company (the “Component Entity”) for the purpose of purchasing and assuming the respective interests of the Limited Partners of the Partnership at an agreed-upon aggregate purchase price of approximately \$2,500,000 (the “Transfer”); and

WHEREAS, in order to create administrative efficiencies, SAHFC seeks to effect the Transfer and convert the Partnership from a Texas limited partnership to a Texas limited liability company (the “Partnership Conversion”); and

WHEREAS, the Project was financed, in part, with the proceeds of (i) the San Antonio Housing Finance Corporation Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008 (the “2008 Bonds”), originally issued in the aggregate principal amount of \$18,500,000 and currently outstanding in the aggregate principal amount of \$14,300,000, pursuant to a Trust Indenture dated as of September 1, 2008 (the “2008 Indenture”), by and between San Antonio Housing Finance Corporation, as issuer (the “2008 Issuer”), and Wells Fargo Bank, National Association, as trustee (the “2008 Trustee”); and

WHEREAS, the proceeds of the 2008 Bonds were loaned to the Partnership pursuant to a Loan Agreement dated as of September 1, 2008 (the “2008 Loan Agreement”), among the 2008 Issuer, Capital One, National Association, as bondholder representative, and the Partnership, and a promissory note made by the Partnership for the benefit of the 2008 Issuer (the “2008 Bond Note”); and

WHEREAS, the Partnership seeks to exercise its option to prepay the 2008 Bond Note, redeem the 2008 Bonds prior to maturity, and pay costs related thereto (the “Payoff”); and

WHEREAS, subject to any regulatory and/or administrative approval, the Payoff and the Transfer will be effected using the proceeds of a disbursement by the Authority of Moving to Work funds or any other available restricted or non restricted funds in an amount of approximately \$17,000,000 (the “MTW Funds” or “any other available restricted or non restricted funds”); and

WHEREAS, in connection with the Payoff, the Transfer, and/or the Partnership Conversion, the Authority, the Partnership, the Component Entity, SAHFC, and/or LVPFC will be required to enter into certain agreements, including, but not limited to, an assignment and assumption agreement, an amended and restated limited partnership agreement, and an amendment to, or termination of, the existing ground lease (collectively, the “Documents”); and

WHEREAS, this Board of Commissioners (the “Board”) has determined that it is in the public interest and to the benefit of the citizens and residents of the City of San Antonio for the various entities to enter into the transactions described above; and

WHEREAS, the Board has reviewed the foregoing and determined that the action herein authorized is in furtherance of the public purposes of the Authority.

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

- 1) Authorizes the expenditure of the MTW Funds and all actions required in connection with the Payoff, the Transfer, and the Partnership Conversion.
- 2) Authorizes and directs the President and CEO, and each Officer of the Authority (each an “Executing Officer”), or any of them, to negotiate, execute, and deliver (or to accept, as the case may be), any documents and other instruments necessary or desirable in

connection with the creation of the Component Entity, the Transfer, the Partnership Conversion, the execution and delivery of the Documents, the expenditure of MTW Funds, or the Payoff in order to give effect to the actions authorized hereby and carry out the intent hereof, and approval of the terms of any of the documents by the Executing Officer and the Board shall be conclusively evidenced by the execution and delivery of such documents.

- 3) Authorizes the Officers of the Board, or any of them, to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.
- 4) Authorizes, ratifies, confirms, and approves all acts heretofore taken by the Officers of the Board in connection with the matters authorized by this Resolution.
- 5) Resolves that if any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.
- 6) Resolves that the recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.
- 7) Resolves that all resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.
- 8) Resolves that this Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.
- 9) Resolves that this Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes

President and CEO

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26LVPFC-03-01**

The undersigned officer of the Las Varas Public Facility Corporation ("LVPFC") hereby certifies as follows:

1. In accordance with the bylaws of LVPFC, the Board of Directors of LVPFC (the "Board") held a meeting on March 4, 2026 (the "Meeting"), of the duly constituted officers and members of the Board at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

**RESOLUTION 26LVPFC-03-01 AUTHORIZING THE EXERCISE OF DURANGO
MIDRISE LP'S OPTION TO PAY OFF THE SAN ANTONIO HOUSING FINANCE
CORPORATION MULTIFAMILY HOUSING REVENUE BONDS (DURANGO
MIDRISE APARTMENTS PROJECT), SERIES 2008; ALL ACTIONS
NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE-MEMBER
LIMITED LIABILITY COMPANY; AND OTHER MATTERS IN CONNECTION
THEREWITH**

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the bylaws of LVPFC.

SIGNED this 4th day of March 2026.

Michael Reyes

Secretary/Treasurer

**Las Varas Public Facility Corporation
Resolution 26LVPFC-03-01**

RESOLUTION 26LVPFC-03-01, AUTHORIZING THE EXERCISE OF DURANGO MIDRISE LP'S OPTION TO PAY OFF THE SAN ANTONIO HOUSING FINANCE CORPORATION MULTIFAMILY HOUSING REVENUE BONDS (DURANGO MIDRISE APARTMENTS PROJECT), SERIES 2008; ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE-MEMBER LIMITED LIABILITY COMPANY; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Texas Public Facility Corporation Act, Chapter 303, Texas Local Government Code, as amended (the "Act"), provides that certain non-profit corporations created by housing authorities shall constitute public facility corporations which are public corporations, constituted authorities, and instrumentalities authorized by the applicable housing authority; and

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio (the "Authority") approved and created Las Varas Public Facility Corporation ("LVPFC") and San Antonio Housing Facility Corporation ("SAHFC") pursuant to and in accordance with the provisions of the Act; and

WHEREAS, LVPFC is the sole member of Durango Midrise GP, LLC, a Texas limited liability company, the general partner (the "General Partner") of Durango Midrise LP, a Texas limited partnership (the "Partnership"), the leasehold owner of the land and fee owner of the improvements comprising the Hemisview Village (formerly Durango Midrise) Apartments Project (the "Project"); and

WHEREAS, the Partnership is comprised of the General Partner, Alliant Tax Credit Fund 50, Ltd., as investor limited partner ("ILP"), Alliant ALP 50, LLC, as administrative limited partner (the "ALP"), Alliant Holdings of Durango, LLC, as special limited partner ("SLP"), and Carleton Durango, LLC, as Class B limited partner ("Class B LP," and with the ILP, ALP, and SLP the "Limited Partners"); and

WHEREAS, LVPFC is the fee owner of the land on which the Project is located (the "Land") and ground lessor under a Ground Lease by and between LVPFC, as landlord, and the Partnership, as tenant, dated as of September 19, 2008 (the "Ground Lease"); and

WHEREAS, the Project was financed, in part, with the proceeds of (i) the San Antonio Housing Finance Corporation Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008 (the "2008 Bonds"), originally issued in the aggregate principal amount of \$18,500,000 and currently outstanding in the aggregate principal amount of approximately \$14,300,000, pursuant to a Trust Indenture dated as of September 1, 2008 (the "2008 Indenture"), by and between San Antonio Housing Finance Corporation, as issuer (the "2008 Issuer"), and Wells Fargo Bank, National Association, as trustee (the "2008 Trustee"); and

WHEREAS, the proceeds of the 2008 Bonds were loaned to the Partnership pursuant to a Loan Agreement dated as of September 1, 2008 (the "2008 Loan Agreement") among the 2008

Issuer, Capital One, National Association, as bondholder representative, and the Partnership, and a bond mortgage note made by the Partnership for the benefit of the 2008 Issuer (the "2008 Bond Note"); and

WHEREAS, the 2008 Bonds are secured by certain instruments including a deed of trust, an assignment of notes, liens, and security interests, and financing statements (collectively, the "2008 Security Documents"), all subject to the terms of a Regulatory Agreement and Declaration of Restrictive Covenants dated as of September 1, 2008 (the "2008 Regulatory Agreement"), among the Partnership, the 2008 Issuer, and the 2008 Trustee; and

WHEREAS, the 2008 Bonds bear variable rate interest swapped to a fixed rate pursuant to an ISDA Master Agreement (the "2008 Swap Agreement," and with the 2008 Indenture, the 2008 Financing Agreement, the 2008 Bond Note, the 2008 Security Documents, and the 2008 Regulatory Agreement, the "2008 Bond Documents"); and

WHEREAS, the Partnership seeks to exercise its option to prepay the 2008 Bond Note, cause the 2008 Bonds to be redeemed prior to maturity, and pay costs related thereto (the "Payoff"); and

WHEREAS, in order to create administrative efficiencies, LVPFC seeks to transfer its General Partner interest in the Partnership to SAHFC or an affiliate thereof, and/or take actions necessary to convert the Partnership from a Texas limited partnership to a Texas limited liability company (collectively, the "Partnership Conversion"); and

WHEREAS, in connection with the Payoff, LVPFC seeks to transfer its fee interest in the Land to SAHFC or an affiliate thereof (the "Land Transfer"), and thus may be required to execute and deliver certain instruments, including, but not limited to, a special warranty deed or similar instrument providing for such transfer, an amendment to the Ground Lease, or a termination of the Ground Lease; and

WHEREAS, the Board of Directors of LVPFC (the "Board") has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Las Varas Public Facility Corporation, hereby:

- 1) Authorizes the Payoff, Partnership Conversion, the Land Transfer, and all actions necessary to effect such transactions.
- 2) Authorizes and directs the Secretary/Treasurer, and each Officer of LVPFC (each an "Executing Officer"), or any of them, to negotiate, execute, and deliver (or to accept, as the case may be), any documents and other instruments, including, but not limited to, documents required to effect the Payoff (including any required terminations of or amendments to the 2008 Bond Documents), the Partnership Conversion, the Land Transfer, or other such instruments necessary or desirable to give effect to the actions authorized hereby and carry out the intent hereof, and approval of the terms of any of the

documents by the Executing Officer and this Board shall be conclusively evidenced by the execution and delivery of such documents.

- 3) The Officers of this Board, or any of them, are authorized to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.
- 4) Authorizes, ratifies, confirms, and approves all acts heretofore taken by the Officers of this Board in connection with the matters authorized by this Resolution.
- 5) Resolves that if any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.
- 6) Resolves that the recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.
- 7) Resolves that all resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.
- 8) Resolves that this Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.
- 9) Resolves that this Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Díaz
President, Board of Directors

Attested and approved as to form:

Michael Reyes
Secretary/Treasurer

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26FAC-03-01**

The undersigned officer of the San Antonio Housing Facility Corporation ("SAHFC") hereby certifies as follows:

1. In accordance with the bylaws of SAHFC, the Board of Directors of SAHFC (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 26FAC-03-01 AUTHORIZING THE FORMATION OF A SINGLE MEMBER LIMITED LIABILITY COMPANY TO ACQUIRE ALL OWNERSHIP INTERESTS OF DURANGO MIDRISE LP; ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE MEMBER LIMITED LIABILITY COMPANY; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTIONS; AND OTHER MATTERS IN CONNECTION THEREWITH

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the bylaws of SAHFC.

SIGNED and SEALED this 4th day of March 2026.



Michael Reyes
Secretary/Treasurer

**San Antonio Housing Facility Corporation
Resolution 26FAC-03-01**

RESOLUTION 26FAC-03-01, AUTHORIZING THE FORMATION OF A SINGLE MEMBER LIMITED LIABILITY COMPANY TO ACQUIRE ALL OWNERSHIP INTERESTS OF DURANGO MIDRISE LP; ALL ACTIONS NECESSARY TO CONVERT SUCH PARTNERSHIP TO A SINGLE MEMBER LIMITED LIABILITY COMPANY; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTIONS; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Texas Public Facility Corporation Act, Chapter 303, Texas Local Government Code, as amended (the “Act”), provides that certain non-profit corporations created by housing authorities shall constitute public facility corporations which are public corporations, constituted authorities, and instrumentalities authorized by the applicable housing authority; and

WHEREAS, the Housing Authority of the City of San Antonio, Texas, a/k/a Opportunity Home San Antonio (the “Authority”) approved and created Las Varas Public Facility Corporation (“LVPFC”) and San Antonio Housing Facility Corporation (“SAHFC”) pursuant to and in accordance with the provisions of the Act; and

WHEREAS, LVPFC is the sole member of Durango Midrise GP, LLC, a Texas limited liability company, the general partner (the “General Partner”) of Durango Midrise LP, a Texas limited partnership (the “Partnership”), which is leasehold owner of the land and fee owner of the improvements comprising the Hemisview Village (formerly Durango Midrise) Apartments Project (the “Project”); and

WHEREAS, LVPFC is the fee owner of the land on which the Project is located (the “Land”) and ground lessor under a Ground Lease by and between LVPFC, as landlord, and the Partnership, as tenant, dated as of September 19, 2008 (the “Ground Lease”); and

WHEREAS, the Partnership is comprised of the General Partner, Alliant Tax Credit Fund 50, Ltd., as investor limited partner (“ILP”), Alliant ALP 50, LLC, as administrative limited partner (the “ALP”), Alliant Holdings of Durango, LLC, as special limited partner (“SLP”), and Carleton Durango, LLC, as Class B limited partner (“Class B LP,” and with the ILP, ALP, and SLP the “Limited Partners”); and

WHEREAS, the Limited Partners seek to sell, and SAHFC, through a newly formed component entity of which it shall serve as sole member (the “Component Entity”), seeks to purchase and assume the respective interests of the Limited Partners of the Partnership at an agreed-upon aggregate purchase price of approximately \$2,500,000 (the “Transfer”); and

WHEREAS, in order to create administrative efficiencies, SAHFC seeks to effect the Transfer and convert the Partnership from a Texas limited partnership to a Texas limited liability company (the “Partnership Conversion”); and

WHEREAS, the Project was financed, in part, with the proceeds of (i) the San Antonio Housing Finance Corporation Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008 (the “2008 Bonds”), originally issued in the aggregate principal amount of \$18,500,000 and currently outstanding in the aggregate principal amount of approximately \$14,300,000, pursuant to a Trust Indenture dated as of September 1, 2008 (the “2008 Indenture”), by and between San Antonio Housing Finance Corporation, as issuer (the “2008 Issuer”), and Wells Fargo Bank, National Association, as trustee (the “2008 Trustee”); and

WHEREAS, the proceeds of the 2008 Bonds were loaned to the Partnership pursuant to a Loan Agreement dated as of September 1, 2008 (the “2008 Loan Agreement”) among the 2008 Issuer, Capital One, National Association, as bondholder representative, and the Partnership, and a promissory note made by the Partnership for the benefit of the 2008 Issuer (the “2008 Bond Note”); and

WHEREAS, the Partnership seeks to exercise its option to prepay the 2008 Bond Note, cause the 2008 Bonds to be redeemed prior to maturity, and pay costs related thereto (the “Payoff”); and

WHEREAS, subject to any regulatory and/or administrative approvals, the Payoff and the Transfer will be effected using the proceeds of a disbursement by the Authority of Moving to Work funds or any other available restricted or non-restricted funds in an amount of approximately \$17,000,000; and

WHEREAS, in connection with the Payoff, the Transfer, and/or the Partnership Conversion, the Authority, the Partnership, the Component Entity, SAHFC, and LVPFC will be required to enter into certain agreements, including, but not limited to, an assignment and assumption agreement, an amended and restated limited partnership agreement, and an amendment to, or termination of, the existing ground lease (collectively, the “Documents”); and

WHEREAS, this Board of Directors of SAHFC (the “Board”) has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the San Antonio Housing Facility Corporation, hereby:

- 1) Authorizes and approves the creation of the Component Entity and all actions of SAHFC and the Component Entity required to effect the Transfer, the Partnership Conversion, the execution and delivery of the Documents, and the Payoff.
- 2) Authorizes and directs the Secretary/Treasurer, and each Officer of SAHFC (each an “Executing Officer”), or any of them, to negotiate, execute, and deliver (or to accept, as the case may be), any documents and other instruments, including, but not limited to, the Documents, one or more assignment and assumption agreements required to effect the Transfer, or any other such instruments necessary or desirable to give effect to the actions authorized hereby and carry out the intent hereof, and approval of the terms of

any of the documents by the Executing Officer and the Board shall be conclusively evidenced by the execution and delivery of such documents.

- 3) Authorizes the Officers of the Board, or any of them, to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.
- 4) Authorizes, ratifies, confirms, and approves all acts heretofore taken by the Officers of the Board in connection with the matters authorized by this Resolution.
- 5) Resolves that if any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.
- 6) Resolves that the recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.
- 7) Resolves that all resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.
- 8) Resolves that this Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.
- 9) Resolves that this Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes

Secretary/Treasurer

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26RSPFC-03-01**

The undersigned officer of the Refugio Street Public Facility Corporation ("RSPFC") hereby certifies as follows:

1. In accordance with the bylaws of RSPFC, the Board of Directors of RSPFC (the "Board") held a meeting on March 4, 2026 (the "Meeting") of the duly constituted officers and members of the Board at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 26RSPFC-03-01, AUTHORIZING THE EXPENDITURE OF UNENCUMBERED PROGRAM INCOME FUNDS TO PAY OFF THE SAN ANTONIO HOUSING FINANCE CORPORATION MULTIFAMILY HOUSING REVENUE BONDS (DURANGO MIDRISE APARTMENTS PROJECT), SERIES 2008; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND OTHER MATTERS IN CONNECTION THEREWITH

(the "Resolution") was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board's minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the bylaws of RSPFC.

SIGNED this 4th day of March 2026.

Michael Reyes
Secretary/Treasurer

**Refugio Street Public Facility Corporation
Resolution 26RSPFC-03-01**

RESOLUTION 26RSPFC-03-01, AUTHORIZING THE EXPENDITURE OF UNENCUMBERED PROGRAM INCOME FUNDS TO PAY OFF THE SAN ANTONIO HOUSING FINANCE CORPORATION MULTIFAMILY HOUSING REVENUE BONDS (DURANGO MIDRISE APARTMENTS PROJECT), SERIES 2008; THE EXECUTION OF ALL DOCUMENTATION NECESSARY TO CARRY OUT SUCH TRANSACTION; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Texas Public Facility Corporation Act, Chapter 303, Texas Local Government Code, as amended (the “Act”), provides that certain non-profit corporations created by housing authorities shall constitute public facility corporations which are public corporations, constituted authorities, and instrumentalities authorized by the applicable housing authority; and

WHEREAS, the Housing Authority of the City of San Antonio, Texas a/k/a Opportunity Home San Antonio (the “Authority”) approved and created Las Varas Public Facility Corporation (“LVPFC”), San Antonio Housing Facility Corporation (“SAHFC”), and Refugio Street Public Facility Corporation (“RSPFC”) pursuant to and in accordance with the provisions of the Act; and

WHEREAS, LVPFC is the sole member of Durango Midrise GP, LLC, a Texas limited liability company, the general partner (the “General Partner”) of Durango Midrise LP, a Texas limited partnership (the “Partnership”), which is leasehold owner of the land and fee owner of the improvements comprising the Hemisview Village (formerly Durango Midrise) Apartments Project (the “Project”); and

WHEREAS, the Partnership is comprised of the General Partner, Alliant Tax Credit Fund 50, Ltd., as investor limited partner (“ILP”), Alliant ALP 50, LLC, as administrative limited partner (the “ALP”), Alliant Holdings of Durango, LLC, as special limited partner (“SLP”), and Carleton Durango, LLC, as Class B limited partner (“Class B LP,” and with the ILP, ALP, and SLP the “Limited Partners”); and

WHEREAS, the Limited Partners seek to sell, and SAHFC, through a newly formed limited liability company of which it shall serve as sole member (the “Component Entity”), seeks to purchase and assume the respective interests of the Limited Partners of the Partnership (the “Transfer”); and

WHEREAS, the Project was financed, in part, with the proceeds of the San Antonio Housing Finance Corporation Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008 (the “2008 Bonds”), originally issued in the aggregate principal amount of \$18,500,000 and currently outstanding in the aggregate principal amount of approximately \$14,300,000, pursuant to a Trust Indenture dated as of September 1, 2008, by and between San Antonio Housing Finance Corporation, as issuer, and Wells Fargo Bank, National Association, as trustee; and

WHEREAS, the Partnership expects to pay off the 2008 Bonds (the “Payoff”), effect the Transfer, and pay costs related thereto using proceeds of a disbursement by the Authority of

approximately \$17,000,000 in funds sourced from Moving to Work funds (the “MTW Funds”) and/or any other available restricted or non-restricted funds in the amount of approximately \$17,000,000 (the “Other Funds”); and

WHEREAS, pursuant to the Mixed-Finance to Consolidated Annual Contributions Contract by and between the U.S. Department of Housing and Urban Development (HUD) and the Authority, dated as of February 6, 2004, as amended by that First Amendment to Mixed-Finance to Consolidated Annual Contributions Contract, dated August 18, 2022 (the “Contract”), RSPFC has \$8,140,299.47 in unencumbered program income funds eligible to be used for any affordable housing purpose (the “RSPFC Funds”); and

WHEREAS, the Partnership has requested that, should the MTW Funds and/or the Other Funds be insufficient or unavailable to effect the Payoff and/or the Transfer, the RSPFC Funds be applied to the Payoff and/or the Transfer; and

WHEREAS, this Board of Directors of RSPFC (the “Board”) has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Refugio Street Public Facility Corporation, hereby:

- 1) Authorizes and approves the expenditure of the RSPFC Funds as set forth in the recitals to effect the Payoff and/or the Transfer.
- 2) Authorizes and directs the Secretary/Treasurer, and each Officer of RSPFC (each an “Executing Officer”), or any of them, to negotiate, execute, and deliver (or to accept, as the case may be), any documents and other instruments necessary or desirable to give effect to the actions authorized hereby and carry out the intent hereof, and approval of the terms of any of the documents by the Executing Officer and the Board shall be conclusively evidenced by the execution and delivery of such documents.
- 3) Determines and confirms that the RSPFC Funds will be used for affordable housing purposes as required by the Contract.
- 4) Authorizes the Officers of the Board, or any of them, to take any and all action necessary to carry out and consummate the transactions described in or contemplated by the documents approved hereby or otherwise to give effect to the actions authorized hereby and the intent hereof.
- 5) Authorizes, ratifies, confirms, and approves all acts heretofore taken by the Officers of the Board in connection with the matters authorized by this Resolution.
- 6) Resolves that if any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.

- 7) Resolves that the recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.
- 8) Resolves that all resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.
- 9) Resolves that this Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.
- 10) Resolves that this Resolution shall be in force and effect from and after its passage.

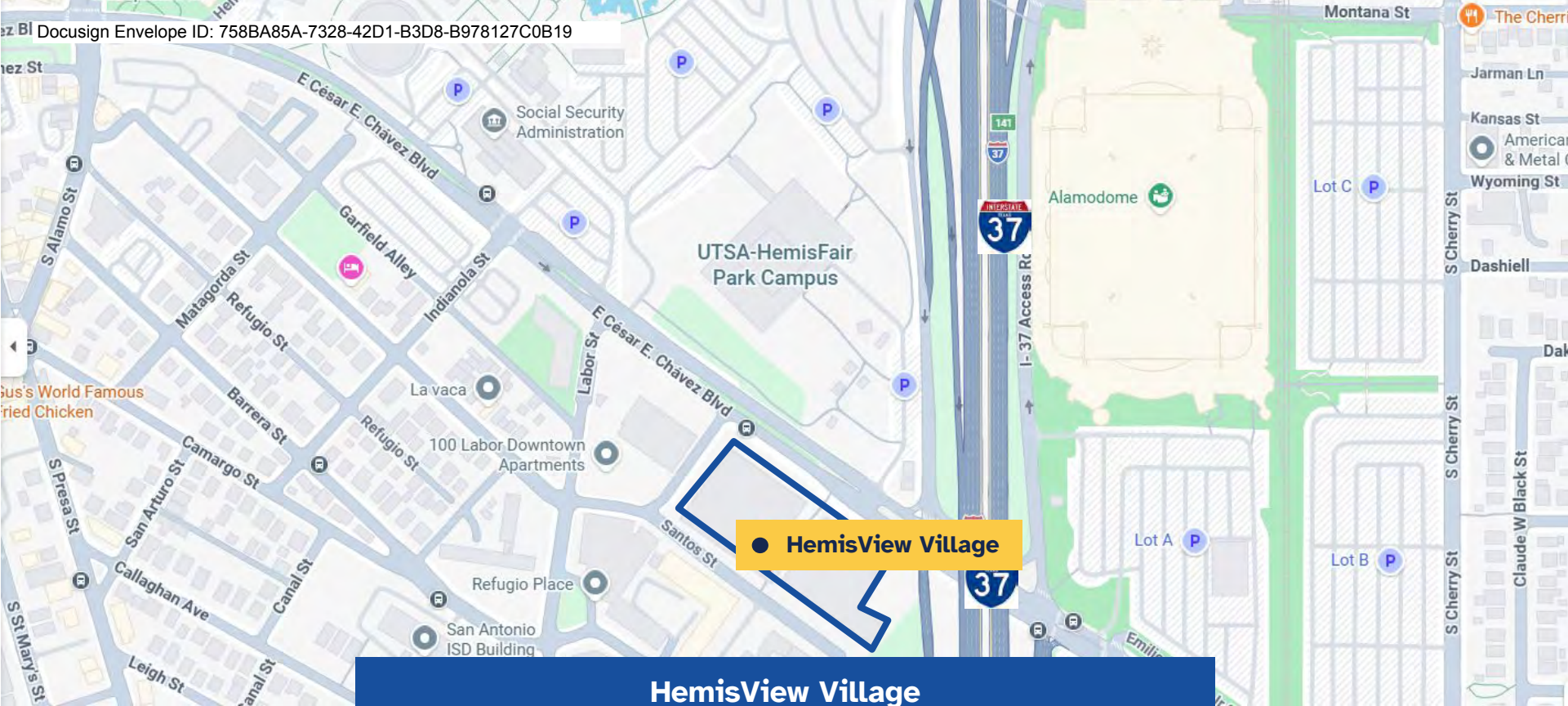
Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz
President, Board of Directors

Attested and approved as to form:

Michael Reyes
Secretary/Treasurer

HemisView Village Apartments Acquisition of Ownership Interest



● HemisView Village

HemisView Village
401 Santos, San Antonio, TX 78210

HemisView Village

History Of Project

The Project is owned by the Partnership, Durango Midrise, LP with Las Varas Public Facility Corporation (LVPFC) as the sole member of Durango Midrise GP, LLC.

The Project was constructed in 2010 and was financed, in part, with SAHFC Multifamily Housing Revenue Bonds (Durango Midrise Apartments Project), Series 2008, originally issued in an aggregate principal amount of \$18,500,000.

The LIHTC qualified affordability period is set to end in 2039, during which a total of 61 units (12 Tax Credit plus 49 Public Housing) will continue to serve individual families earning at or below 50% of the Area Median Income (AMI) until expiration.

Construction Date: 2010

Total Units: 245

Market: 184 units

Tax Credit: 12 units at
50% AMI

Public Housing: 49 units

HemisView Village



Requesting Board authorization for the following actions:

- Acquire all ownership interest to convert partnership to a Single Member LLC
- Acquisition of Class B LP, Administrative LP and ILP interest in an amount not to exceed \$2,500,000
- The Payoff and the Transfer will be effected using the proceeds of a disbursement by the Authority of Moving to Work funds or any other available restricted or non restricted funds in a total amount of approximately \$17,000,000

HemisView Village



Page 186 of 487

Planned renovation of the asset:

Further Board approval will be required to secure a loan, not to exceed \$10,000,000, to facilitate the future renovation of the asset. The renovation scope will encompass emergent repairs to the roof, foundation, and siding, as well as the comprehensive renovation of the exterior, mechanical systems, and common area elements. Due to current monetary constraints, unit interiors will continue to be upgraded incrementally at turnover. The final renovation scope is not yet formalized, this action will be presented to the Board at a subsequent date.

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

**BOARD OF COMMISSIONERS
Regular Board Meeting**

RESOLUTION 6913, AUTHORIZING THE LAS VARAS PUBLIC FACILITY CORPORATION TO APPROVE THE INDUCEMENT RESOLUTION FOR THE PROPOSED 4% LOW-INCOME HOUSING TAX CREDIT PROJECT TO BE KNOWN AS THE QUANTUM DRIVE APARTMENTS

Signed by:

Michael Reyes

Michael Reyes

President and CEO

Nicholas Delaunay

Project Manager I, Development Services
and Neighborhood Revitalization

REQUESTED ACTION:

Consideration and approval regarding Resolution 6913, authorizing Las Varas Public Facility Corporation to approve the inducement resolution for the proposed 4% low-income housing tax credit project to be known as the Quantum Drive Apartments.

SUMMARY:

We are seeking authority to file applications related to the construction and financing of the Quantum Drive Apartments project (the "Project"). As you will recall, all 4% tax credit projects must be financed in part with tax-exempt bonds. To issue tax-exempt bonds, the issuer must obtain a volume cap allocation from the Texas Bond Review Board. This is time-sensitive and can be competitive. We will be applying for a volume cap, which may not be awarded until next year if any are available. We need to submit our applications as soon as we can. Accordingly, we are asking you to authorize these actions so that we may get in line, but we are not asking you to specifically approve or be bound to this project. ***These are non-binding resolutions.*** This will enable us to move forward, begin putting the financing together, and negotiate the specific terms of the deal, which we will bring back to the Board for approval.

The Quantum Drive Apartments is a project proposed by Dominion or an affiliate, which will be located at approximately the southwest corner of the intersection of Quantum Drive and SW Loop 410, San Antonio, Texas 78242.

The Project is expected to contain approximately 400 units, of which approximately 10% (or 40 units) will be reserved for tenants earning 30% or less of area median income, approximately 69% (or 275 units) will be reserved for tenants earning 60% or less of area median income, and approximately 21% (or 85 units) will be reserved for tenants earning 70% or less of area median income. The total project cost is approximately \$151,806,908.

LVPFC will initially induce its participation as the issuer of tax-exempt bonds in an amount of up to \$70,000,000.

The attached Resolutions authorizes Las Varas Public Facility Corporation ("LVPFC") to approve an inducement resolution for its participation in the Project and certain actions described above.

STRATEGIC OUTCOMES:

Residents live in quality, affordable housing

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

Residents have a sufficient supply of affordable housing options

ATTACHMENTS:

Resolution 6913

Resolution 26LVPFC-03-02

Slides

**Opportunity Home San Antonio
Resolution 6913**

RESOLUTION 6913, AUTHORIZING THE LAS VARAS PUBLIC FACILITY CORPORATION TO APPROVE THE INDUCEMENT RESOLUTION FOR THE PROPOSED 4% LOW-INCOME HOUSING TAX CREDIT PROJECT TO BE KNOWN AS THE QUANTUM DRIVE APARTMENTS

WHEREAS, one of the strategic goals of the Housing Authority of the City of San Antonio, Texas a/k/a Opportunity Home San Antonio (“Opportunity Home San Antonio”), is to expand the supply of affordable housing; and

WHEREAS, a principal financing mechanism for new affordable housing is the 4% low-income housing tax credit; and

WHEREAS, staff has proposed the Quantum Drive Apartments, a proposed approximately 400-unit multifamily housing project (the “Project”) to be potentially financed in 2026 or 2027; and

WHEREAS, it is proposed that the Las Varas Public Facility Corporation (“LVPFC”) apply for volume cap allocation for the Project; and

WHEREAS, LVPFC will pass a nonbinding resolution to induce the Project, authorizing the applications needed to finance the Project and to negotiate the terms of such financing, which will be brought back to the Board of Commissioners of Opportunity Home San Antonio (the “Board”) for final consideration.

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

- 1) Approves Resolution 26LVPFC-03-02, inducing the proposed Project and authorizing the applications necessary therefor and the negotiation of the terms of the financing therefor.
- 2) Authorizes the President and CEO, or any other Officer or Commissioner of Opportunity Home San Antonio, to execute all necessary documents associated therewith.

All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

If any section, paragraph, clause, or provision of this Resolution shall be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Resolution.

The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes

President and CEO

**CERTIFICATE FOR RESOLUTION
RESOLUTION 26LVPFC-03-02**

The undersigned officer of the Las Varas Public Facility Corporation (the “Issuer”) hereby certifies as follows:

1. In accordance with the bylaws of the Issuer, the Board of Directors of the Issuer (the “Board”) held a meeting on March 4, 2026 (the “Meeting”), of the duly constituted officers and members of the Board, at which a duly constituted quorum was present. Whereupon, among other business transacted at the Meeting, a written

RESOLUTION 26LVPFC-03-02, CONCERNING THE APPLICATION OF SAN ANTONIO LEASED HOUSING ASSOCIATES I, LP OR AN AFFILIATE THEREOF RELATING TO THE PROPOSED FINANCING OF UP TO \$70,000,000 FOR THE COSTS OF THE ACQUISITION, CONSTRUCTION, AND EQUIPPING OF THE QUANTUM DRIVE APARTMENTS PROJECT, TO BE LOCATED AT APPROXIMATELY THE SOUTHWEST CORNER OF THE INTERSECTION OF QUANTUM DRIVE AND SW LOOP 410, SAN ANTONIO, TEXAS 78242; AND OTHER MATTERS IN CONNECTION THEREWITH

(the “Resolution”) was duly introduced for the consideration of the Board and discussed. It was then duly moved and seconded that the Resolution be adopted; and, after due discussion, said motion, carrying with it the adoption of the Resolution, prevailed and carried by a majority vote of the Board.

2. A true, full, and correct copy of the Resolution adopted at the Meeting is attached to and follows this Certificate; the Resolution has been duly recorded in the Board’s Minutes of the Meeting; each of the officers and members of the Board was duly and sufficiently notified officially and personally, in advance, of the time, place, and purpose of the Meeting; and the Meeting was held and conducted in accordance with the Articles of Incorporation and the bylaws of the Issuer.

SIGNED this 4th day of March 2026.

Michael Reyes
Secretary/Treasurer

**Las Varas Public Facility Corporation
Resolution 26LVPFC-03-02**

RESOLUTION 26LVPFC-03-02, CONCERNING THE APPLICATION OF SAN ANTONIO LEASED HOUSING ASSOCIATES I, LP OR AN AFFILIATE THEREOF RELATING TO THE PROPOSED FINANCING OF UP TO \$70,000,000 FOR THE COSTS OF THE ACQUISITION, CONSTRUCTION, AND EQUIPPING OF THE QUANTUM DRIVE APARTMENTS PROJECT, TO BE LOCATED AT APPROXIMATELY THE SOUTHWEST CORNER OF THE INTERSECTION OF QUANTUM DRIVE AND SW LOOP 410, SAN ANTONIO, TEXAS 78242; AND OTHER MATTERS IN CONNECTION THEREWITH

WHEREAS, the Housing Authority of the City of San Antonio, a/k/a Opportunity Home San Antonio, Texas (“Opportunity Home San Antonio”), has, pursuant to the Texas Public Facility Corporation Act, Chapter 303, Texas Local Government Code, as amended (the “Act”), approved and created the Las Varas Public Facility Corporation, a nonstock, nonprofit public facility corporation (the “Issuer”); and

WHEREAS, the Issuer, on behalf of Opportunity Home San Antonio, is empowered to finance the costs of residential ownership and development that will provide decent, safe, and sanitary housing at affordable prices for residents of the City of San Antonio (the “City”) by the issuance of housing revenue bonds; and

WHEREAS, San Antonio Leased Housing Associates I, LP or an affiliate thereof (the “User”) has filed an Application (the “Application”), requesting that (i) the Issuer finance the acquisition, construction, and equipping of a proposed approximately 400-unit multifamily housing project to be located approximately the southwest corner of the intersection of Quantum Drive and SW Loop 410, San Antonio, Texas 78242, to be known as the Quantum Drive Apartments project (the “Project”); and (ii) the Issuer file a 2026 and/or 2027 Allocation Application (defined hereafter) and/or any carryforward applications associated with such Allocation Applications to the Texas Bond Review Board as described herein; and

WHEREAS, the User has advised the Issuer that a contributing factor that would further induce the User to proceed with providing for the acquisition, construction, equipping, and improvement of the Project would be a commitment and agreement by the Board of Directors of the Issuer (the “Board”) to issue housing revenue bonds pursuant to the Act (the “Bonds”) to finance and pay any Development Costs (as defined in the Act) for the Project; and

WHEREAS, in view of rising construction costs and the necessity of compliance with administrative regulations, it is considered essential that acquisition, construction, equipping, and improvement of the Project be completed at the earliest practicable date after satisfactory

preliminary assurances from the Issuer that the proceeds of the sale of the Bonds or other obligations of the Issuer in an amount necessary to pay the Development Costs of the Project will be made available to finance the Project; and

WHEREAS, this Resolution shall constitute the Issuer's commitment, subject to the terms hereof, to issue Bonds or other obligations pursuant to the Act in an amount prescribed by the User now contemplated at an amount of up to \$70,000,000 and to expend the proceeds thereof to pay Development Costs, including costs of acquisition, construction, equipping, and improvement of the Project, funding a debt service or other reserve fund for the Project, and paying expenses and costs in connection with the issuance of the Bonds, including costs of obtaining credit enhancement, if any; and

WHEREAS, the Bonds are "private activity bonds" as that term is defined in Subchapter A, Section 1372.001 of Chapter 1372, Texas Government Code, as amended, including the rules promulgated pursuant thereto in 34 Texas Administrative Code, Sections 190.1 through 190.8 (together, the "Allocation Act"), and various provisions of the Internal Revenue Code of 1986, as amended (the "Code"); and

WHEREAS, the Code requires that the applicable elected official of the City approve the issuance of the Bonds after a public hearing for which reasonable public notice shall have been given; and

WHEREAS, the Issuer is authorized by the provisions of the Act to issue the Bonds; and

WHEREAS, in order to issue the Bonds in the manner contemplated, the Issuer must seek an allocation of the State of Texas volume cap pertaining to private activity bonds in order to satisfy the provisions of the Code; and

WHEREAS, in order to satisfy, in part, the provisions of the Allocation Act, the Issuer must submit an "Application for Allocation of Private Activity Bonds" or an "Application for Carryforward for Private Activity Bonds" (the "Allocation Application") to the Texas Bond Review Board and adopt this Resolution authorizing the filing or refiling of the Allocation Application; and

WHEREAS, the Allocation Application and the Allocation Act require that the Issuer certify that the Bonds are not being issued for the same stated purpose for which the Issuer has received sufficient carryforward during a prior year or for which there exists unexpended proceeds from a prior issue or issues of bonds issued by the Issuer; and

WHEREAS, the User intends to make capital expenditures in connection with the acquisition, construction, equipping, and improvement of the Project (the “Expenditures”) and expects to reimburse the Expenditures with proceeds of the Bonds; and

WHEREAS, in order to allocate under Treasury Regulation Section 1.150-2 (the “Regulation”) proceeds of the Bonds to the Expenditures, the Issuer must declare its reasonable expectation to reimburse the Expenditures; and

WHEREAS, the User has requested authorization to make all filings necessary to obtain and maintain debt financing and tax credits on the Project; and

WHEREAS, the Board has determined that it is in the public interest and to the benefit of the citizens and residents of San Antonio for the various entities to enter into the transactions described above so that the User may construct the Project.

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Las Varas Public Facility Corporation, that:

Section 1. Subject to the terms hereof, the Issuer agrees that it will

(a) subject to the negotiation of mutually acceptable agreements, issue the Bonds, in an amount of up to \$70,000,000;

(b) cooperate with the User with respect to the issuance of the Bonds, and, if arrangements therefor satisfactory to the User and the Issuer can be made, take such action, authorize the execution of such documents, and take such further action as may be necessary or advisable for the authorization, execution, and delivery of any contracts or agreements deemed necessary and desirable by the User or the Issuer in connection with the issuance of the Bonds (collectively, the “Contracts”), providing, among other things, for payment of the principal of, interest on, redemption premiums on, and paying agents’ and trustee’s fees and charges, if any, on the Bonds; payment of fees, charges, and expenses of the Issuer and Opportunity Home San Antonio (including legal and financial advisory expenses); acquisition, construction, equipping, and improvement of the Project; and use, operation, and maintenance of the Project (and the execution of any necessary guaranty agreements), all as shall be authorized, required, or permitted by law and as shall be satisfactory to the Issuer, Opportunity Home San Antonio, and the User;

(c) if the proceeds from the sale of the Bonds are insufficient to complete the acquisition, construction, equipping, and improvement of the Project, take such actions and execute such documents as may be necessary to permit the future issuance of additional bonds from time to time on terms which shall be set forth therein, whether on a parity with other series of bonds or otherwise, for the purpose of paying the costs of completing the acquisition,

construction, equipping, and improvement of the Project, as requested by the User and within then applicable limitations; and

(d) take or cause to be taken such other actions as may be required to implement the aforesaid undertakings or as it may deem appropriate in pursuance thereof.

The Bonds shall specifically provide that neither the State of Texas (the "State"), Opportunity Home San Antonio, nor any political issuer, subdivision, or agency of the State shall be obligated to pay the same or the interest thereon and that neither the faith and credit nor the taxing power of the State, Opportunity Home San Antonio, or any political issuer, subdivision, or agency thereof is pledged to the payment of the principal of, premium, if any, or interest on the Bonds.

Section 2. It is understood by the Issuer, and the User has represented to the Issuer, that in consideration of the Issuer's adoption of this Resolution and by filing the Application, and subject to the terms and conditions hereof, the User has agreed that:

(a) prior to or contemporaneously with the sale of the Bonds in one or more series or issues from time to time as the Issuer and the User shall hereafter agree to in writing, the User will enter into the Contracts with the Issuer, under the terms of which the User will obligate itself, on a nonrecourse basis, to pay to the Issuer (or to a trustee, as the case may be) sums sufficient in the aggregate to pay the principal of, interest on, redemption premiums on, paying agents' and trustee's fees and charges, if any, on the Bonds, as and when the same become due and payable, with such Contracts to contain the provisions described in Section 1 hereof and such other provisions as may be required or permitted by law and mutually acceptable to the Issuer and the User;

(b) the User will (1) pay all Project costs which are not or cannot be paid or reimbursed from the proceeds of the Bonds and (2) at all times from and after the issuance of the Bonds, indemnify and hold harmless the Issuer and Opportunity Home San Antonio against all losses, costs, damages, expenses, and liabilities of whatsoever nature (including but not limited to reasonable attorneys' fees, litigation and court costs, amounts paid in settlement, and amounts paid to discharge judgments) directly or indirectly resulting from, arising out of, or related to the issuance, offering, sale, or delivery of the Bonds, or the design, construction, equipping, installation, operation, use, occupancy, maintenance, or ownership of the Project (other than claims arising from the gross negligence or willful misconduct of the Issuer or Opportunity Home San Antonio) and prior to or contemporaneously with the sale of the Bonds will agree to provide indemnification on terms satisfactory to the Issuer; and

(c) no Bonds will be issued without the approval of Opportunity Home San Antonio.

Section 3. The User is hereby authorized to make all filings necessary to obtain and maintain tax credits on the Project.

Section 4. Except as expressly extended by the Issuer, it is understood by the Issuer and the User that all commitments of the Issuer with respect to the Project and the Bonds are subject to the condition that the Bonds shall have been issued no later than two years from the date of this Resolution.

Section 5. It is recognized and agreed by the Issuer that the User may exercise its rights and perform its obligations with respect to the financing of the Project either through (i) itself in its own name; (ii) any “related person” as defined in section 144(a)(3) of the Code; (iii) any legal successor thereto; (iv) an entity in which any of the above is a general partner or sole member; or (v) or any entity approved by the Issuer, provided that suitable guaranties necessary or convenient for the marketability of the Bonds shall be furnished, if required by the Issuer, and all references herein to the User shall be deemed to include the User acting directly through itself or any such approved entities.

Section 6. This Resolution shall be deemed to constitute the acceptance of the User’s proposal that it be further induced to proceed with providing the Project. The Allocation Application and this Resolution shall constitute an agreement between the Issuer and the User effective on the date that this Resolution is adopted. This Resolution is an affirmative official action taken by the Issuer towards the issuance of the Bonds in order to comply with the requirements of the Code. **Neither the User nor any other party is entitled to rely on this Resolution as a commitment to issue bonds or loan funds, and the Issuer reserves the right not to issue the Bonds either with or without cause and with or without notice, and in such event, the Issuer shall not be subject to any liability or damages of any nature. Neither the User nor anyone claiming by, through, or under the User, nor any investment banking firm or potential purchaser of the Bonds, shall have any claim against the Issuer whatsoever as a result of any decision by the Issuer not to issue the Bonds.**

Section 7. The Issuer hereby adopts this Resolution in order to satisfy the requirements of the Allocation Act pertaining to the issuance of the Bonds and authorizes any officer or designee of the Issuer to prepare and file a 2026 and/or 2027 Allocation Application and/or any carryforward applications associated with such Allocation Application, together with all required attachments (including obtaining the Issuer’s Certificate of Good Standing from the Comptroller of Public Accounts for the State of Texas) in the form required by the Texas Bond Review Board.

Section 8. The Issuer respectfully requests that the Allocation Application be accepted and approved by the Texas Bond Review Board.

Section 9. Any Officer of the Issuer (or his designee) is hereby authorized to execute the Allocation Application, to pay (or cause the User to pay) the Application Fee of \$5,000 for each Allocation Application (submitted to the Issuer by the User) to the Texas Bond Review Board, and to submit any additional information or make any necessary corrections or revisions

requested by the Texas Bond Review Board in order to satisfy the requirements of the Allocation Act in connection with the Allocation Application.

Section 10. The Board certifies that the Bonds are not being issued for the same stated purpose for which the Issuer has received sufficient carryforward during a prior year or for which there exists unexpended proceeds from a prior issue or issues of bonds issued by the Issuer.

Section 11. In connection with the issuance of the Bonds, the Board hereby authorizes its bond counsel to arrange for the publication of a notice of public hearing in the City of San Antonio, Texas, regarding the Bonds for the purpose of complying with section 147(f) of the Code. The form of notice of such hearing and the date, place, and manner of its publication shall be acceptable to the Issuer's bond counsel. The hearing shall be held by the Issuer's bond counsel.

Section 12. Based upon representations from the User, the Issuer reasonably expects to reimburse the Expenditures with proceeds of the Bonds in a principal amount of up to \$70,000,000. This Resolution shall constitute a declaration of official intent under Treasury Regulation Section 1.150-2.

Section 13. The Board authorizes the President, Vice President, Secretary/Treasurer, or any Assistant Secretary/Treasurer of the Board to execute any documents or certificates necessary to seek the approval of the Bonds by the Texas Attorney General.

Section 14. The recitals contained in the preamble hereof are hereby found to be true, and such recitals are hereby made a part of this Resolution for all purposes and are adopted as a part of the judgment and findings of the Board.

Section 15. All resolutions, or parts thereof, which are in conflict or inconsistent with any provision of this Resolution are hereby repealed to the extent of such conflict, and the provisions of this Resolution shall be and remain controlling as to the matters resolved herein.

Section 16. If any provision of this Resolution or the application thereof to any person or circumstance shall be held to be invalid, the remainder of this Resolution and the application of such provision to other persons and circumstances shall nevertheless be valid, and the Board hereby declares that this Resolution would have been enacted without such invalid provision.

Section 17. This Resolution shall be construed and enforced in accordance with the laws of the State of Texas and the United States of America.

Section 18. This Resolution shall be in force and effect from and after its passage.

Passed and approved this 4th day of March 2026.

Estrellita Garcia-Diaz

President, Board of Directors

Attested and approved as to form:

Michael Reyes

Secretary/Treasurer

Quantum Drive

Overview

- Approval of inducement of up to \$70,000,000 in tax-exempt bonds issued by Las Varas Public Facility Corporation, for the development of Quantum Drive Apartments
- Approval for the submission of a bond application to the Texas BRB
- At this point Opportunity Home San Antonio and its affiliates have no financial obligation in the project except for bond inducement
 - Non-binding resolutions
- Dominion is the housing provider for this project

Overview of the Housing Provider

- Dominion was founded in 1972 and has been in the business of developing, acquiring, and managing affordable multifamily housing for over 50 years.
 - First project in San Antonio
- Dominion is headquartered in Dallas, TX
 - Multiple LIHTC projects across the country
 - Regional offices in Minneapolis, Atlanta, and Phoenix
 - The Dallas office team serves San Antonio
- Dominion currently manages and owns over 40,000 units.
- In Texas, Dominion has partnered with Housing Authorities and Housing Finance Corporations
 - Austin
 - Houston
 - Dallas/Fort Worth
 - Bryan/College Station
 - Midland/Odessa

**Direct Area:**

- Walmart Supercenter
- Sun Valley Elementary School

Within 5 Mile Radius:

- Johnston Branch Library
- Lackland Airforce Base
- Pearsall Park
- Southwest High School

Quantum Drive

Intersection Of Quantum Drive And SW Loop 410
San Antonio, TX 78242

Project Data



City Council District 4

Southwest ISD

Total Units: Approx 400 Units

40 Units ≤ 30% AMI

275 Units ≤ 60% AMI

85 Units ≤ 70% AMI

0 Units are Market Rate

Unit Mix

1 bedroom - 24 Units

2 bedroom - 92 Units

3 bedroom - 188 Units

4 bedroom- 96 Units

4% Tax Credit and Bonds

PROFORMA BREAKDOWN (approximate)

Land Cost	\$6,350,000
Hard Cost	\$90,501,440
Soft Costs	\$54,955,468
<i>Per Unit Cost</i>	<i>\$379,517</i>
Total Project Cost	\$151,806,908

COMMUNITY AND RESIDENT IMPACT

Cross-Subsidy for Targeted Affordability

Proceeds from this project will help support very low-income residents by preserving, expanding and sustaining affordable housing and resident services, including:



Constructing new affordable units serving **50% AMI** and below

Funding **budget gaps** in **affordable housing** projects

Preserving and **upgrading** existing Public Housing units

Acquiring existing properties to expand our affordable housing portfolio

Providing **supportive services** for residents

Operating an **Emergency Rental Assistance** program

Building **reserves** to maintain strong financial sustainability

HOUSING BENEFITS

Expands access to **workforce housing** in an area with limited affordable housing options

Strengthens **pathways to opportunities** through education, job training, recreation and community amenities

Improves access to **transportation** and **employment** opportunities



Questions?

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026****MEMORANDUM**

To: Board of Commissioners

From: Michael Reyes, President and CEO 

Presented by: Nicholas Tennessee, MTW & Strategy Analyst

RE: Authorizing the proposed FY 2026-2027 Moving to Work (MTW) Agency Plan

SUMMARY:

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

Opportunity Home is on track to complete the 2026-2027 Agency Plan in time for the April submission deadline to HUD.

Proposed changes to existing activities

- 1 MTW Activity has been placed on hold to be closed out in the FY2026 MTW Report
 - FY2024-1 | Elimination of Earned Income Disregard
 - This activity will be closed due to obsolescence after the updated HOTMA regulations took effect.
- 1 MTW Activity will be updated
 - 2020-1 | College and University Homeless Assistance Program
 - This activity will add additional universities to the program to allow student referrals from UT-San Antonio and Texas A&M-San Antonio.

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

The proposed revisions to the Admissions and Continued Occupancy Policy (ACOP), Public Housing Lease, and Administrative Plan are

- **Housing Choice Voucher (HCV) Administrative Plan**
 - **18.6.C Organization of the Waiting List**
 - This section update may impact applicants. The updated language would allow Opportunity Home to operate a single centralized waiting list, with subparts, for the PBV program. The centralized waiting list will address the administrative burden of maintaining multiple waiting lists.
 - **9.1.B Requesting Tenancy Approval**
 - Changes to this section could impact program participants and landlords. The revised language permits Opportunity Home to set the process for

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

submitting the Request for Tenancy Approval (RTA). The Organization accepts electronic submissions of RTAs and any necessary corrections.

- **18.8.B Rent Limits**
 - Changes to this section may impact participants. Language has been revised to note that Opportunity Home will apply the higher of the approved SAFMRs or MAFMRs to establish rent amounts for the PBV program.
- **19.6.F Income Eligibility**
 - The language has been updated to comply with the VASH income eligibility updates established by HUD through the Federal Register notice titled “Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program.”
- **13.1.C Owner Responsibilities**
 - The update to this section may impact program landlords. The policy changes in this section are intended to streamline documentation requirements for new and existing owners participating in the Housing Choice Voucher (HCV) program.
- **13.1.D Owner Qualifications**
 - The update to this section may impact program landlords. The policy changes in this section are intended to streamline documentation requirements for new and existing owners participating in the Housing Choice Voucher (HCV) program.
- **19.2 College and University Homeless Assistance Program**
 - This section has been updated to allow referrals to the CHAP program from all Alamo Community Colleges, and to add the University of Texas at San Antonio (UTSA) and Texas A&M University - San Antonio (TAMUSA) to the program.
- **6.3.A Overview of Rent and Subsidy Calculations**
 - This update may affect participants. This change clarifies the minimum rent for Moving to Work (MTW) voucher programs administered by Opportunity Home, and aligns with the minimum rent for the standard HCV program.
- **3.3.D Other Permitted Reasons for Denial of Admission**
 - This section update may affect applicants. The language in this section has been revised to allow Opportunity Home to deny admission to the voucher program when applicants owe rent or other amounts to Opportunity Home.
- **19.9 Non-Elderly Disabled (NED) Vouchers**
 - Section 19.9 outlines the policy for administering the Non-Elderly Disabled (NED) Voucher program. NED vouchers serve families with a head of household, co-head of household, or spouse who is a non-elderly person with a disability.
- **6.3.A Overview of Rent and Subsidy Calculations**
 - This change may affect participants. Section 6.3.A(5)(e) will be updated to align with the proposed MTW activity “FY2026-1: Elimination of Negative Rent,” which would eliminate utility reimbursements for non-elderly and non-disabled families as defined by HUD regulations. Implementation of this activity will occur at a later date once all necessary programming

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

updates are complete.

- **Chapter 21: Project Based Voucher under the Rental Assistance Demonstration**
 - Chapter 21 describes HUD regulations and Opportunity Home policies related to the Project Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program.
- **Public Housing, Admissions and Continued Occupancy Plan (ACOP)**
 - **3.3.D Other Permitted Reasons for Denial of Admission**
 - The language in section 3.3.D(4)(d)(ii) will be revised to prohibit applicants with outstanding debts to Opportunity Home from entering into repayment agreements at the time of admission. All balances related to any Opportunity Home housing program must be paid in full before an applicant can be admitted to Public Housing.
 - **12.4.G Eligibility for Continued Occupancy**
 - This change will affect residents. Section 12.4.G(c) will be updated to require that any Public Housing resident requesting a transfer to a different Public Housing community must satisfy all outstanding debts owed to Opportunity Home in full prior to being determined eligible for the transfer. Residents will not be permitted to enter into a Repayment Agreement to meet this eligibility requirement.
 - **Termination due to Breach of an RPA**
 - This change will affect residents. The language in section 13.3.C(2)(vii) will be updated to align with HUD regulations (PIH 2018-18), which require PHAs to terminate assistance for breach of a repayment agreement.
 - **16.3.B Family Debts to Opportunity Home**
 - These changes may affect residents. Section 16.3.B(1-3),(e)(i)(C),(f)(1),(2)(i), and (v)(B) have been updated to state that residents will not be eligible for a Repayment Agreement for any debts owed that are not the result of under-reported or unreported income. Existing repayment agreements for other debt types will remain in effect until completed or breached.
 - **Alternatives to Termination of Tenancy**
 - This change may affect residents. Section 13.3.D(2)(a) will be updated to reflect the proposed policy update, which is to permit repayment agreements only in instances of unreported or under-reported income. This means a Repayment Agreement will serve as an alternative to termination exclusively for qualifying cases of unreported or under-reported income.
 - **Interim Reexaminations due to Increases in Income**
 - This change may affect residents. Sections 9.3.C(3)(b)(i)(A)&(B) will be updated to require residents to report increases in monthly income of \$200 or more within 10 business days after the change takes effect.
 - **5.2.B Number of Offers**
 - This change may affect applicants. Section 5.2.B(1) will be updated to state that Opportunity Home will only extend one unit offer.
 - **Utility Reimbursements**
 - This change may affect residents. Section 6.3.A(1)&(5) will be updated to align with the proposed MTW activity "FY2026-1: Elimination of Negative Rent", which would eliminate utility reimbursements for non-elderly and

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

non-disabled families as defined by HUD regulations. Note that implementation of this policy will take place at a later date, once programming updates are completed.

- **Proposed Revisions to the Public Housing Lease**
 - **Lease Part II - Recording on Property**
 - New language was added to PH Lease Part II, section (IX)(dd), to protect the privacy and peaceful enjoyment of the premises by prohibiting the recording of residents or staff without their knowledge and consent. An exception is made only for documenting evidence of criminal activity for law enforcement as permitted by law.
 - **Lease Part II - Doorbell Cameras**
 - New language will be added to the Lease Part II section (IX)(l) to allow residents to install doorbell cameras with prior written approval from Opportunity Home. The update also stipulates that residents must agree and sign an acknowledgement form if approved for a doorbell camera.
 - **Lease Part II - Mini/Portable Washer and Dryer**
 - New language was added to PH Lease Part II section (IX)(g) prohibiting the use of mini/portable washers and dryers. This measure ensures that electrical and plumbing systems are used only for their intended purposes and prevents unauthorized equipment from straining building infrastructure.
 - **Lease Part II - Keys and Methods of Entry to the Premises**
 - Lease Part II section (IX)(ee) was added to strengthen property security. This new provision mandates that residents maintain exclusive possession of all access devices and strictly prohibits the duplication or sharing of keys and fobs with non-residents. Additionally, it prohibits behaviors that compromise building security, such as propping doors or allowing unauthorized 'tailgating' into the premises.
 - **Lease Part II - Opportunity Home Maintenance and Systems**
 - New language is being added to section Lease Part II section (IX)(x) to prohibit the unauthorized tampering with, or adjustment of, any Opportunity Home systems and equipment. The language further requires that residents notify property staff of all maintenance issues via a formal work order and refrain from contacting or hiring any outside vendor for repairs without prior written approval from Opportunity Home. This update is intended to ensure that all repairs meet Opportunity Home's safety and quality standards.
 - **Lease Part II - Solicitation**
 - New language was added to Lease Part II section (IX)(cc) prohibiting the placement of any signs, flyers, or advertisements throughout the property and common areas without prior written approval. It further prohibits engaging in or allowing any unauthorized commercial solicitation, door-to-door sales, or the distribution of unapproved marketing materials; this includes a restriction on surveying other residents without management consent, unless such outreach is specifically protected by federal law for resident organizing (e.g., Resident Councils).

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

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

- **Resident Service Coordinator Terminology**
 - Current Policy: The action plan language refers to Resident Service Coordinator(s).
 - Proposed Change: Change the action plan language from Resident Service Coordinator(s) to Resident Service Specialists for all relevant sections.
- **Section 1.2.F Update Family Demographics**
 - Current Policy: This section includes a table detailing household demographics for the Housing Choice Voucher (HCV) and Public Housing programs based on FY20 data.
 - Proposed Change: Include the most current demographics available to ensure accurate reporting of resident characteristics.
- **Section 4.1.B FSS Program Fund Use**
 - Current Policy: The FSS Program Fund, created from forfeited escrow accounts, is used for FSS program-related support, such as supportive service requests by FSS families or training of FSS Resident Service Coordinators to enhance service delivery.
 - Proposed Policy Change: The fund will be used for FSS program-related support, such as supportive service requests by FSS families, group training and activities directly related to an FSS participant's ITSP, or training of FSS Resident Service Specialists to enhance service delivery.
- **Section 5.1.C Defining "Good Standing" and Lease Compliance**
 - Current Policy (Lease Compliance Definition): "For the purposes of the FSS Program, comply with the lease means the FSS family has not been evicted for repeated or serious violations of the lease; or if they have been evicted for serious or repeated violations of the lease, the family has prevailed in either the grievance hearing or the informal hearing process."
 - Proposed Policy Change (Lease Compliance Definition): "For the purposes of the FSS Program, comply with the lease means the FSS family must be current on any debts owed to Opportunity Home, has not defaulted on any Repayment Agreement Plans, has not been evicted for repeated or serious violations of the lease; or if they have been evicted for serious or repeated violations of the lease, the family has prevailed in either the grievance hearing or the informal hearing process."
- **Section 6.1.B (3) Rent and Total Tenant Payment (TTP) Calculation**
 - Current Policy (HCV): For the HCV program, *family rent* is 30 percent of adjusted monthly income [24 CFR 984.305(b)(1)].
 - Proposed Policy Change (HCV): For the HCV program, *family rent* is based on the HCV rent simplification policy [referenced in section 6.3.A(1)(f) of the Administrative Plan].
- **Section 6.1.C (2) Interim Disbursement of FSS Account Funds**
 - Current Policy: Policy details for partial disbursement of escrow funds before contract completion for interim goals or one-time payment of ongoing expenses.
 - Proposed Policy Change (New Sub-sections):
 - (ii.) Opportunity Home reserves the right to request that the family attend a meeting to clarify the withdrawal request before a determination is made, and/or may require additional documentation before making a decision.

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

- (iii.) Opportunity Home will allow interim disbursement withdrawals not to exceed 50% of the participant's program lifetime accrued escrow. If sufficient funds are available, certain circumstances may allow withdrawals of more than 50% at Opportunity Home's discretion.
- **Section 6.1.E Use of Forfeited Escrow Funds Request Limits**
 - Current Policy: Requests for supportive service funds by FSS families in good standing may not exceed \$2,500 in a calendar year. The frequency of requests is not explicitly limited.
 - Proposed Policy Change:
 - e. FSS Heads of Household in good standing may request funds for supportive services by providing a statement of need and supporting documentation.
 - The request shall not exceed \$2,500 per calendar year.
 - While the standard protocol remains one request per year, additional requests may be approved at the discretion of Opportunity Home, provided the total annual cap is not exceeded.

Development and Asset Management

Preservation

- **Public Housing:** Over the next five years, the Organization plans to invest approximately \$48 million in capital repairs to extend the useful life of 30 properties and approximately 2,983 housing units.

Expansion

- The organization has 8 potential investments and/or acquisitions of tax credits
 - Hemisview, Sutton Oaks I, Artisan at Mission Creek, Mirabella Senior, The Park at Sutton Oaks, San Juan Square I, San Juan Square II, and The Gardens at San Juan Square

Repositioning

- The organization may begin the process of repositioning Public Housing sites in FY27 - standard HUD policies and procedures for application and initiation of these conversions will be followed
 - Tarry Towne, Villa Hermosa, Marie McGuire, and Westway

MTW TIMELINE

- February: Draft MTW Plan posted for public comment
- March: Public Hearing scheduled during Regular Board Meeting
- April: 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 after approval

PROPOSED ACTION:

Hold a Public Hearing and provide updates regarding the proposed 2026-2027 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.

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

STRATEGIC OUTCOMES:

Supports all strategic outcomes.

ATTACHMENTS:

MTW Plan

Slides

DRAFT

Annual MTW PLAN

Fiscal Year 2026-2027
July 1, 2026 to June 30, 2027

Formerly San Antonio Housing Authority



Document submission date:

MTW Plan DRAFT Released For Public Comment: February 18, 2026

MTW Plan DRAFT Submitted to HUD for review: TBD

Final MTW Plan Submitted to HUD for approval: TBD

Final MTW Plan Approved by HUD: TBD



Section I | Introduction

Section I. A. | Table of Contents

Section I Introduction	3
Section I. A. Table of Contents	3
Section I. B. Overview of Short-term and Long-Term MTW Goals and Objectives	6
Section II General Operating Information	8
Section II. A. Housing Stock Information	8
Section II. A. i. Planned New Public Housing Units	8
Section II. A. ii. Planned Public Housing Units to be Removed	8
Section II. A. iii. Planned New Project Based Vouchers	9
Section II. A. iv. Existing Project Based Vouchers	9
Section II. A. v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year	10
Section II. A. vi. General Description of All Planned Capital Expenditures During the Plan Year	12
Section II. B. Leasing Information	12
Section II. B. i. Planned Number of Households Served	12
Section II. B. ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing	13
Section II. C. Waiting List Information	14
Section II. C. i. Waiting List Information Anticipated	14
Section II. C. ii. Planned Changes to Waiting List in the Plan Year	15
Section III Proposed MTW Activities	16
Section IV Approved MTW Activities	19
A. Implemented Activities	19
FY2011-1e Preservation and Expansion of Affordable Housing	19
Plan Year Approved, Implemented, Amended	19
FY2011-9 Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	20
FY2013-4 HQS Inspection of Opportunity Home properties by Opportunity Home inspectors	21
FY2014-3 Faster Implementation of Payment Standard Decreases	22
FY2014-6 HCV Rent Reform	22
FY2015-3 Modified Project Based Vouchers (MPBVs)	25
FY2019-1 Local Implementation of SAFMR	27
FY2019-2 Alternate Recertification Process	30
FY2020-1 College & University Homeless Assistance Program	31
FY2021-1 Next Step Housing Program	34
FY2022-1 Resident Income Exclusions	36
FY2025-1 Early Engagement	37
B. Not Yet Implemented Activities	39
FY2023-1 Income Based Housing Assistance Program (IBHA)	39



C. Activities On Hold	39
FY2024-1 Elimination of Earned Income Disregard	39
D. Closed Out Activities	40
Section V Planned Application of MTW Funds	44
Section V. A. Planned Application of MTW Funds	44
Section V. A. i. Estimated Sources of MTW Funds	44
Section V. A. ii. Estimated Application of MTW Funds	44
Section V. A. iii. Description of Planned Application of MTW Funding Flexibility	45
Section V. A. iv. Planned Application of PHA Unspent Operating Fund and HCV Funding	47
Section V. A. v. Local Asset Management Plan	48
Section V. A. vi. Rental Assistance Demonstration (RAD) Participation	48
Section VI Administrative	49
Section VI. A. Board Resolution and Certifications of Compliance	49
Section VI. B. Documentation of Public Process	50
Section VI. C. Planned And Ongoing Evaluations	52
Section VI. D. Lobbying Disclosures	53
Appendix Additional Items	55
Appendix A Public Comments Summary Report	56
Appendix B Summary of Revisions to the Admissions & Continued Occupancy Policy (ACOP)	57
Appendix C Summary of Revisions to the Administrative Plan	69
Appendix D Summary of Revisions to the Family Self-Sufficiency (FSS) Action Plan	164
Appendix E Asset Management Plan	167
Appendix F Third-Party Lease Agreements	181
Appendix G Alternative Definition to Self-Sufficiency	182
Appendix H Resident Advisory Board	183
Appendix I Rental Assistance Demonstration (RAD) & Section 18 Repositioning	184



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 priorities for the next eleven years as the Organization nears its 100th anniversary in 2037. It also describes how those priorities connect to a shared understanding of the environment in which the Organization works, the impact of the Organization's work on the broader community, questions that are critical to research, and ongoing 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 three key goals and establishes objectives and action steps that will be taken to achieve these goals. These overarching goals will guide the Organization to its 100th anniversary and ensure successful outcomes for the Organization's residents, employees, and the community we serve. The three strategic goals include:

- Housing: Develop, acquire, finance, and preserve 14,500 affordable units in a diverse portfolio of housing options, ensuring long-term affordability and stability for all residents of the San Antonio area.
- Opportunities: Create opportunities that build collaborative partnerships to support our residents, engage our stakeholders, and strengthen the entire community.
- Innovation: Enhance innovation that continually elevates the internal and external customer experience.



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 Bdm	1 Bdm	2 Bdm	3 Bdm	4 Bdm	5+ Bdm	TOTAL UNITS	POPUL ATION TYPE*	Section 504 Access Units* (Mobility)	Section 504 Units* (Hearing / Vision)
N/A	0	0	0	0	0	0	0	N/A	0	0

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:

N/A

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
HB Gonzalez / TX006000026	51	Comprehensive redevelopment
Scattered Sites / TX006000033	69	Disposition from portfolio - as-is sales, and potential sale to non-profit housing partners
Westway / TX006000026	152	Projected RAD and/or Section 18 redevelopment
Lofts at Marie McGuire / TX006000010	63	Projected RAD and/or Section 18 redevelopment
Villa Hermosa / TX006000010	66	Projected RAD and/or Section 18 redevelopment



Tarry Towne / TX006000013	98	Projected RAD and/or Section 18 redevelopment
TOTAL:	499	
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.

Note: RAD redevelopments may result in blends of PBV and PBRA, resulting in some PBVs at each property. Exact breakdowns will be determined at the time of application, dependent on financing requirements and resident feedback.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
North/South Pond	50	No	MPBV New Construction
TOTAL:	50		
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	Supports: 1) Family Homeless Program in partnership with the local CoC (MTW Activity 15-3), 2) THRU Project for foster youth



				aging out of care (MTW Activity 21-1), 3) VASH PBVs (not funded through MTW but, per previous HUD approval, are subject to certain MTW policies)
Rosemont at Highland Park	20	Leased / Issued	No	Supports Family Homeless Program in partnership with the local CoC (MTW Activity 15-3)
425 San Pedro	25	Leased / Issued	No	PSH in partnership with local housing providers
Aspire at Tampico	20	Leased / Issued	No	Existing property
Commons at Acequia Trails	80	Committed	No	PSH in partnership with local housing providers
Snowden	54	Leased / Issued	No	Existing elderly property
Total:	362			
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 intends to transition existing owned assets within the Affordable Housing Communities portfolio into Single Asset entities to mitigate the administrative recordkeeping and audit burden associated with the properties. Below is a summary of the assets expected to transition.

Priority	Property Name	Current Ownership	MTW / LNT Use Agreement	PH Units	RAD?
1st	Ravello	AHC	Y	0	N/A
2nd	Midcrowne	AHC	Y	39	TBD
3rd	Alhambra	AHC	Y	14	TBD
4th	Refugio	AHC	Y	50	TBD
5th	Science Park	AHC	Y	0	N/A



6th	O'Conner	AHC	Y	0	N/A
7th	Villa de San Alfonso (aka Vera Cruz)	AHC	Y	0	N/A

The Organization is also in the process of transferring existing ground leases from the Las Varas Public Facility Corporation to the San Antonio Housing Finance Corporation. This action is being taken to mitigate liability insurance risk. Below is a summary of the assets expected to transfer.

	Property Name	Current Ownership	MTW / LNT Use Agreement	PH Units	RAD?
	Artisan at Mission Creek (aka Artisan @ Military)	Partnership	N	0	N/A
	Costa Almadena	Partnership	N	0	N/A
	Mirabella Senior Apartments	Partnership	N	0	N/A
	Elan Gardens	AHC	Y	0	N/A
	The Sorento (fka Primrose at Monticello)	Partnership	N	0	N/A
	Southgate at Emerald (fka Rosemont at University Park)	Partnership	N	0	N/A

The Organization may employ PBV and PBRA units at RAD redevelopments, resulting in PBRA units at properties. Unit blends will be determined at application to HUD and follow all necessary guidelines for conversion. Exact breakdowns will be determined at the time of application, dependent on financing requirements and resident feedback. The Organization will list such breakdowns as available in annual MTW Reports.

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, architectural and engineering (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	1,700,000	Program Administration
PHA Wide	3,400,000	PH Operating Shortfall
PHA Wide	250,000	Foundation Repairs
PHA Wide	250,000	Electrical Repairs
PHA Wide	250,000	HVAC Repairs
PHA Wide	250,000	Plumbing Repairs
PHA Wide	250,000	Roofing Repairs
PHA Wide	4,215,783	Dispo/Demo Assistance
Alazan	5,700,000	Lead-Based Paint Abatement
Alazan	600,000	Bring Offline Units Online
Alazan	850,000	Exterior Renovations
Blanco	3,176,000	Fire Protection Installation
Highview	1,857,576	Weatherize Windows and Roofs
Jewett Circle	2,948,114	Property Reno / Elevator Modernization
Linda Lou	450,000	Property Renovations
Linda Lou	100,000	Weatherize Windows and Roofs
Marie McGuire	470,000	Elevator Modernization
Matt Garcia	3,650,200	Fire Protection Installation
Morris Beldon	2,856,781	Property Renovations
Villa Hermosa	6,800,000	Fire Protection and Improvements
William Sinkin	1,000,000	Property Renovations
Total	\$41,024,454	

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 HOUSEHOLDS TO BE SERVED**
Public Housing Units Leased	69,180	5,765
Housing Choice Vouchers (HCV) Utilized	130,800	10,900
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	29,880	2,490



PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served:	229,860	19,155

* "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 Households to Be Served**
Tenant-based		0	0
Property-Based		29,880	2,490
Homeownership		0	0

* The sum of the figures provided should match the totals provided for each local, non-traditional category in the previous table. Figures should be given for each 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
Public Housing	Public housing continues to face challenges, including aging infrastructure, crime, and vacant unit security. The Organization continues to maintain an average occupancy near established goals and continues to work to maintain or increase the occupancy percentage. Waitlist cleaning is projected for FY27 to assist in faster turnaround of residents to ensure unit downtime is minimal.
Housing Choice Voucher	The Housing Voucher Department previously was utilized and is now looking to start issuing for lease-up based on attrition and to increase the utilization average. The waiting list will be reviewing the response rate of notices to determine if maintenance is required, and staff will continue to work with partners to maintain high utilization of special programs.
Local, Non-Traditional	The Organization is continuing its efforts to diversify its Local, Non-Traditional portfolio and meet internal occupancy targets. The primary challenge during the last fiscal year stemmed from marketing and training gaps. Competing



with new developments in an area (San Antonio ranked 7th nationally for new developments) posed difficulties for the Organization's aging properties. To address this, the Organization leveraged its communication department to enhance website and social media marketing and increased staff participation in city-wide resource fairs to promote property affordability. Looking ahead, comprehensive plans were initiated in FY26 to revamp training, focusing on sales, marketing, and compliance skills for onsite property staff, with continued training slated as a major focus for FY27.

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 voucher program	17,122	Closed	No
Accessible Unit Public Housing	Community-wide; For applicants who require a 504 accessible unit	2,884	Open	Yes
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).	5,624	Open	Yes
Family Public Housing	Community-wide; For applicants who are in families (Non-elderly, non-disabled)	40,376	Currently closed as of 5/26/25	No
Snowden Project-Based	Site-based	606	Closed as of 3/17/25	No
La Posada MOD Rehab	Site-based	8,110	Closed	No
Aspire at Tampico Project-Based Vouchers	PBV Site-based	1,328	Currently closed as of 8/25/23	No
East Meadows Project-Based Vouchers	PBV Site-based	2,726	Closed	No



Gardens at San Juan Square Project-Based Vouchers	PBV Site-based	5,576	Closed	No
Wheatley Park Senior Project-Based Voucher	PBV Site-based	26	Closed	Yes
Four25 San Pedro Project-Based Voucher	Site-based	0	Closed (Referrals only)	No
PBV Referred Affordable Housing Communities	PBV Site-based	0	Not open to public (S8 Referrals Only)	No
Local Non-Traditional Property-Based	Site-based	0	Closed (Referrals Only)	No
Stability Voucher	This waitlist is used exclusively for Stability referrals	0	Private (Referrals Only)	No

Please describe any duplication of applicants across waiting lists:

Waitlist figures are reported as of February 1, 2026. There are a total of 64,532 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.

Any waiting list not included in the table below has no changes planned.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Housing Choice Voucher	Plans to update the list by sending out notices of continued interest to remaining applicants.
Family Public Housing	Plans to update the list by sending out notices of continued interest to remaining applicants.
Project-Based Vouchers - Site-Based	Plans to combine all Project-Based Voucher - Site-Based waitlists into General Project-Based Voucher waitlists by Family, and Elderly type



Section III | Proposed MTW Activities

FY2026-1 | Elimination of Negative Rent

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity -

The activity would eliminate negative rents for PH residents and HCV participants who are non-elderly, non-disabled. Under current regulations, if a family's utility allowance exceeds their total tenant payment (TTP), the Organization issues a reimbursement (negative rent). Under this activity:

For Non-Elderly/Non-Disabled Households: The TTP and UA will be calculated as usual. If the calculation results in a negative rent, the reimbursement will not be issued.

For Elderly/Disabled Households: No change. These households will continue to receive UAP reimbursements if their utility allowance exceeds their TTP, in accordance with standard HUD guidelines.

ii. Describe how the activity will achieve one or more of the 3 statutory objectives and the specific impacts on that objective -

This activity would result in greater cost effectiveness of federal dollars by eliminating reimbursement checks sent to households with negative rent. This elimination would ease administrative burden on staff, and the savings resulting from this activity can be redirected towards other Agency needs.

iii. Provide the anticipated schedule for implementing the proposed activity -

Public Comment/Hearing: February/March 2026

Plan Submission: April 2026

Staff Training & Software Configuration: Fall 2026

Resident Notification: 30–60 days prior to implementation.

Effective Date: Implementation could occur in the Spring of 2027

iv. Specify if the PHA plans to apply this activity to any SPV types -

The PHA does not plan to apply this activity to any SPVs.

B. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications for the PHA -

The proposed activity is projected to result in cost savings, resulting in a surplus.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the PHA will manage the surplus or deficit anticipated -



Estimate: Based on current data, the PHA expects to save approximately \$750,000 annually in negative rent payments.

Management: These funds will remain within the MTW Block Grant and be used to support other MTW-authorized housing and self-sufficiency initiatives.

C. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement that give the MTW PHA flexibility to conduct the proposed activity -

Attachment C, Section C.11 (HCV) and Section D.2.a (Public Housing). These sections allow the PHA to determine the amount of tenant rent and the method for calculating it.

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity -
Standard HUD regulations (24 CFR 982.517 and 960.253) require the PHA to pay a UAP if the utility allowance exceeds the TTP. Only through MTW flexibility can the PHA waive these specific sections of the 1937 Act to cap the rent at \$0 and eliminate the reimbursement check.

D. RENT REFORM INFORMATION

i. Impact Analysis -

Agency Finances: Expected reduction in HAP expenditures and administrative overhead.

Affordability: For the target population (non-elderly/non-disabled), this represents a minor increase in their gross housing cost (the loss of the reimbursement check). However, by maintaining the current UA schedule, the PHA ensures that the tenant's *rent to the owner* remains stabilized.

Protected Classes: Since elderly and disabled households are exempt, the impact is focused on "work-able" households. No disparate impact is anticipated as the policy applies uniformly to the remaining population.

ii. Hardship Case Criteria -

A hardship is defined as a situation where the loss of the UAP results in:

1. The household is at imminent risk of **utility shut-off** for essential services (heat, water, electricity).
2. The household is at imminent risk of **eviction** due to an inability to cover the gap between the UA and actual costs during a period of zero income.
3. **Loss of income** that has lasted more than 30 days.

iii. Description of Annual Reevaluation -

The PHA will monitor the number of hardship requests and the total HAP savings annually as part of the **MTW Report**. If more than 20% of the affected population requires a hardship waiver, the PHA will reevaluate the activity.



iv. Transition Period -

To minimize the impact, the PHA will provide a **one-time transition notice** to all affected households at least 60 days before the policy goes into effect. No retroactive UAP collections will occur; the change will only apply moving forward.



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 in the FY2011 MTW Plan and implemented in that fiscal year.

Description/Update

Description: This activity maintains the Organization's authority and ability to fund local, non-traditional units under the scope of MTW flexibility. Under Opportunity Home's broader uses of funds authority, Attachment D, the Organization may use MTW funding for local, non-traditional units provided that the activities meet the requirements of the MTW statute. In FY2014, HUD approved an RFH amendment and RFH Plan to combine replacement housing factor (RHF) funds with the MTW block grant to fund local, non-traditional units.

Note: The Organization's flexibility to construct new Section 8 or 9 units is authorized under MTW single-fund flexibility, and those outcomes will be reported in the Sources and Uses of Funds section. 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.

The Organization may also develop or acquire new and/or existing communities with market-rate units in addition to affordable units; however, this activity does not authorize the use of MTW funds (including RHF funds) for the development of those market-rate units.

The Organization also expects to continuously evaluate possible investment and/or acquisition of existing Low Income Housing Tax Credit (LIHTC) properties that are at or approaching the end of their initial 15-year compliance period in an effort to expand and preserve affordable housing within the City of San Antonio. The Organization may elect to use its broader use of funds authority to execute these financial deals.

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing across San Antonio. Throughout each FY, the Organization's Asset Management department monitors various assets to determine if and when to acquire in an effort to expand affordable housing options across the city. The MTW Report and Asset Management Plan in the appendix of this Plan will share the properties and number of units that have been preserved or added due to this activity.

Planned Non-Significant Changes

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 FY2011 and implemented in the same fiscal year. This activity was amended in FY2019-2020.

Description/Update

Description: The Organization allocates up to 240 tenant-based vouchers for households referred by non-profit sponsors who commit to providing supportive services. The set-aside vouchers support two main programs:

- The Set Aside Homeless Voucher (SHVP) Program - This program provides rental voucher assistance to homeless individuals through a collaborative referral process. San Antonio Metropolitan Ministries (SAMMinistries) and the Center for Healthcare 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 SHVP program. Case management and supportive services are provided by SAMMinistries and CHCS.
- Move On Program - This 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 serviced through supportive housing, and will benefit from ongoing housing subsidies to prevent a return to homelessness. The current partner for this program is the localities' Continuum of Care organization, Close to Home.

FY2019-2020 included amendments as follows:

- 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 under the VAWA Act of 2013.

Update: This activity is ongoing, and the Organization continues to utilize the allocated vouchers to reduce homelessness in San Antonio in partnership with local non-profit agencies. The Organization will continue to track and report the number of households receiving services and their median length of stay in this program.

Planned Non-Significant Changes

The Organization may add additional vouchers under this program in FY27 to continue serving this population and assisting our non-profit partners.

Planned Significant Changes

None.

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

Plan Year Approved, Implemented, Amended

This activity was approved as part of the FY2013 MTW Plan. Implementation began in January 2013.

Description/Update

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 an Opportunity Home affiliate under the Organization's partnerships portfolio.

Replacing third-party contractors allows the Organization to save on the costs associated with housing inspections and results in better cost efficiency. The net savings are the difference between the estimated cost of a third-party inspector and the cost of an Opportunity Home staff member performing such inspections.

Update: This activity is active and ongoing. The Organization continues to experience cost efficiencies by conducting inspections "in-house". The Organization will continue to track and report on the estimated cost savings amount based on the number of inspections per FY.



Planned Non-Significant Changes

None.

Planned Significant Changes

None.

FY2014-3 | Faster Implementation of Payment Standard Decreases

Plan Year Approved, Implemented, Amended

This activity was approved as part of the FY2014 MTW Plan and implemented in the same year.

Description/Update

Description: This activity is designed to achieve the statutory objective of reducing cost and producing greater cost effectiveness. 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 with a 30-day notice of rental increase.

Update: This activity is active and ongoing. The Organization is implementing the appropriate payment standard at regular reexaminations, interim reexaminations, and moves. The Organization will continue to track and report Agency cost savings resulting from this activity based on the average number of households served in the FY multiplied by the average HAP cost.

Planned Non-Significant Changes

None.

Planned Significant Changes

None.

FY2014-6 | HCV Rent Reform

Plan Year Approved, Implemented, Amended



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

For FY2014-6 Rent Simplification, the Agency received HUD approval as part of the FY2014 Plan and began implementation in July 2014. For the FY2015-4 Simplified Utility Allowance Schedule, the Organization received HUD approval as part of the FY2015 MTW Plan and began implementation in January 2015.

Description/Update

Description: This activity is designed to meet the statutory objective of increasing cost effectiveness. 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, the 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 on the participant's rent portion. The HCV program has a minimum rent of \$50. 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 spend calculating the tenant rent portion. The quality control score will be obtained from an Access database.

(2) Simplified Utility Allowance Schedule Description: Prior to this activity, the Agency conducted annual reviews and periodically re-established a Utility Allowance Schedule to represent reasonable utility cost expectations as part of a tenant's lease. The Utility Allowance Schedule is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by the tenant, and type of appliances (gas/electric).

This activity establishes a new, simplified schedule that is based on the analysis of data collected from the Organization's existing HCV portfolio, including the most common structure and utility types. The simplified schedule reduces administrative costs associated with the traditional method of applying a Utility Allowance Schedule. Specifically, the activity will allow the HCV department to be more cost-effective by reducing staff time spent on calculating multiple



utility schedules for 6 different structure types, plus various utility types such as gas, electric, or propane.

The simplified utility allowance schedule is also anticipated to benefit property owners, who will have a more accurate understanding of the total gross rent to be applied to their properties, and to benefit participants, who will be able to use this new schedule to clarify gross rent in their selection of housing units.

The new utility allowance schedule is implemented at the time of recertification, interim, or change of unit. The schedule will be applied to the lesser of these two options:

- the actual size of the unit; or
- the size of the voucher

The flat utility allowance will not be granted in the case of tenant-provided appliances, which are not considered tenant-supplied or -paid utilities. The Organization will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon a change of more than 10% in rates).

Hardship Policy: Households that experience a rent increase of \$26 or more due to the rent simplification calculation will be granted a hardship exemption and have the household's TTP calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each recertification.

On June 13, 2019, the Agency received HUD approval to extend these MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of this waiver to the HUD-VASH Program in FY2020. Additionally, the FSS waiver was moved under this activity in FY2023 to streamline activity reporting and management.

Update: This activity is active and ongoing and continues to minimize administrative costs with minimal impacts to residents. Estimated cost savings based on the number of files processed in the FY will continue to be tracked and reported to ensure the goal of the activity is maintained.

Planned Non-Significant Changes

None.

Planned Significant Changes

None.



FY2015-3 | Modified Project Based Vouchers (MPBVs)

Plan Year Approved, Implemented, Amended

This activity was approved in FY2015 and implemented in the same fiscal year. It has been amended two times since its implementation in FY2020 and FY2021.

Description/Update

Description: This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost-effectiveness. 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 the 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 that 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. The activity amendments that remain in effect today are listed below,

FY2019-2020 Amendments:

- Allocated eighty (80) additional project-based vouchers to support the following initiatives:
 - THRU Project: Up to ten (10) modified PBVs at Opportunity Home properties will be committed to support MTW Activity 2021-1.
 - Family Homeless: Up to twenty (20) modified PBVs at Opportunity Home properties will be committed to support Close to Home, the local Continuum of Care lead organization.



- Affordable Housing Communities: Up to thirty (30) modified PBVs at a new Opportunity Home - Affordable Housing Communities development.
- Adopted an alternative waitlist policy for the modified PBVs committed that support the various programs discussed 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.

FY2020-2021 Amendments:

- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Organization's Affordable Housing Communities Portfolio. Due to a lack of vacancies, the Organization plans to allocate these vouchers across multiple properties to ensure they are utilized and occupancy needs are met.
- 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 a 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 on the payment standard minus UA;
 - the reasonable rent (determined by a third party); or
 - the rent requested by the owner.

Update: This activity is active and ongoing and assists the Organization in facilitating the expansion and preservation of affordable housing, resulting in increased housing choices. The Organization currently administers 257 MPBVs and will provide the spread of those vouchers in a table to be included in each MTW Report. The Organization may also cap housing subsidies to not exceed the current HUD funding amount per voucher.

Planned Non-Significant Changes

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.

- FY2018-2019: 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
- FY2019-2020: 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.
- FY2025-2026:
 - Exception overlay methodology and policy were removed.

Description/Update

Description: This activity is designed to increase housing choices for low-income families by creating payment standards that better reflect market conditions in different parts of San Antonio, and thereby 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 the 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 included analyzing the 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 who have 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 on HAP expenditures is typically phased in over a period of three years.

Under the new Small Area Fair Market (SAFMR) regulation, 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) Agency, 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's 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 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.

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 one MTW activity with special hardship policies: FY2014-6: Rent Simplification. Hardships outlined in that activity will apply under this activity.

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.

Update: This activity is active and ongoing and continues to assist the Organization in efforts to increase housing choice. The Organization will continue to monitor the activity and report data around each grouping to highlight residents' ability to move to units as a result of this activity.

Planned Non-Significant Changes

None.

Planned Significant Changes

None.



FY2019-2 | Alternate Recertification Process

Plan Year Approved, Implemented, Amended

The activity was approved in the FY2019 MTW Plan and implemented in FY2019. It was amended in FY2023.

Description/Update

Description: This activity is designed to reduce cost and achieve greater cost effectiveness in Federal expenditures, by providing an alternate schedule for the 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.

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, FY2014-5, and FY2016-2) and adds a new waiver for the third element.

In FY2016, the Organization created a local form with an expiration date of 39 months to replace the HUD-9886 Form with the preset 15-month expiration date.

(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. By FY2023, the Organization updated all household schedules 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 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. PHAs are also obligated to conduct annual updates of family composition for these families who have chosen to pay flat rent regardless of HUD-allowed triennial recertifications.

As residents move to 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)

The Organization will accept the family's self-certification of the value of family assets and anticipated income for net assets totaling \$25,000 or less. Third-party verification of assets is still required for assets totaling a value of more than \$25,000.



In order to increase the rate of files completed in a timely manner, the Organization will skip the third-party verification form required by HUD's Verification Hierarchy and instead use oral third-party verification when tenant-provided documents are deemed unacceptable.

The Organization has also 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. The Organization also 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 Only)

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 the interim recertification years, this activity allows the Organization to apply the increased payment standards at each approved request for a rental increase.

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, and
- (2) adding alternate payment standard increase procedures.

Update: This activity is active and ongoing, and the Organization continues to see cost savings. Cost savings continue to be tracked and reported based on estimated annual costs in the Public Housing and Housing Choice Voucher programs.

With continued delays in HOTMA implementation, this activity remains fully active. Certain provisions within this activity, including net asset self-certifications, will no longer be necessary after full HOTMA implementation. When this occurs, the policy will be updated accordingly.

Planned Non-Significant Changes

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 was approved in the FY2020 MTW Plan and implemented in the same fiscal year.

Description/Update

Description: This activity is designed to achieve the MTW statutory objective to increase housing choices by providing homeless college students with stable housing. The activity supports the creation of a homeless set-aside program(s) in partnership with local colleges and universities to address the local housing needs of homeless college and/or university students.

This program assists the Organization in addressing this local housing need through a tenant-based set-aside voucher. Since these set-asides will have time limits, alternative eligibility requirements, and be married to homeless college/university pilot programs, they are being proposed separately from the Organization's set-asides allocated under FY2011-9.

This activity initially set aside 50 vouchers to be split between two Alamo Area Colleges. Currently, the Organization has 100 vouchers set aside for this program and partners with all five Alamo Colleges for referrals.

Students seeking housing vouchers through the Homeless Assistance Program must meet any criteria outlined by the partner college/university, which may differ from internal housing criteria. Eligibility for housing will remain consistent across all programs, and students must adhere to both sets of requirements.

Students receiving housing assistance through this set-aside must meet eligibility criteria for income levels, background checks, and lawful residency. Students will follow all other voucher policies, including MTW rent calculations (FY2014-6: HCV Rent Reform), MTW alternative payment standard schedules (FY2019-1: Local Implementation of SAFMR), and MTW alternative examinations (FY2019-2: Alternate Recertification Process).

Students will have up to one year after graduation to secure housing, at which point students are no longer eligible for the set-aside voucher, but, if needed, will receive information and resources on the Organization's non-profit affordable housing portfolio.

In addition, this 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 of 2019, which establishes 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, 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 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 that leases include language per HUD regulations. The Organization (and its education partner(s)) 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.

Update: This activity is ongoing, and utilization rates remain at adequate levels. The Alamo Colleges remain a strong partner with continuous referrals to place students in this program.

The Organization will continue to monitor and present data, including utilization rates and graduation rates among the population served under this activity, to track success and improve upon the program.



Planned Non-Significant Changes

The Organization will add two local universities to this program, UT San Antonio and Texas A&M University - San Antonio, as pilots at the start of FY27. Along with the addition of these universities, the Organization will also begin university transfer allowances at the start of FY27 for students who graduate from any of the Alamo Colleges and subsequently transfer to either of the two pilot universities to ensure they remain housed while furthering their education.

Planned Significant Changes

None.

FY2021-1 | Next Step Housing Program

Plan Year Approved, Implemented, Amended

This activity was approved and implemented in the FY2021 MTW Plan Year.

Description/Update

Description: This activity is designed to achieve the statutory objective of increasing housing choices. This activity allocates vouchers to youth aging out of foster care who are at risk of homelessness. The vouchers provide youth with the ability to lease decent, safe, affordable housing in the private housing market.

Partner Program Overview - THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness. It will offer affordable housing and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and shelter. Each placement will focus on preparing the youth for living independently 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 courses
3. Home visits by the case manager
4. Access to an employment specialist



5. Participants are also required to save a percentage of personal income, on a sliding scale, so that at the end of one year, they have at least \$2,500 in savings.

Activity Overview - Ten (10) modified project-based vouchers are allocated at Woodhill Apartments to support this partnership as approved under FY2020 amendments to the FY2015-3 MTW activity. The Organization will contribute up to 36 months of housing assistance to support youth being served by the Next Step Program, broken down as follows;

Year 1 (12 months)

- Youth are enrolled in the Next Step 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 HCV 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.
- Once youth complete the first year (12 months), they will have the option of continuing on housing assistance with the traditional tenant-based voucher provided by the Organization.
 - Youth must be recommended by the partner for continued assistance in the voucher program.
 - Youth will have access to the tenant-based voucher for an additional 2 years (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 and will NOT have their portion capped.

Due to the nature of this activity, youth will have an annual recertification and will not follow the alternative recertification processes established under FY2019-2 Alternate Recertification Process. Additionally, youth admitted under this activity will follow the Organization's alternative implementation of small area fair market rents (SAFMRs) as established in FY2019-1.

Update: This activity has been implemented and is ongoing. The Organization is currently working with the partner to address ongoing low utilization challenges. This pilot program is offering many opportunities for the Organization to test and learn how to partner with another agency 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 while ensuring units are available for students as soon as possible.

As a result, the Organization is exploring whether to close this activity and utilize more FYI vouchers. The Organization currently administers 25 FYI vouchers and plans to apply for additional vouchers. If additional vouchers are awarded, the Organization intends to perform a comprehensive review of this activity to determine whether it should be closed.

Planned Non-Significant Changes

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

The activity was approved in the FY2022 MTW Plan and implemented in the same year.

Description/Update

Description: This activity was designed to meet the statutory objective of increasing housing choices. In addition, this activity was 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 were able to receive additional local support and not have their housing assistance negatively impacted. This activity established an alternative policy that excluded contributions from 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 were not included in the household's annual income for purposes of calculating rent.

Contributions covered by this policy included regular monetary and nonmonetary contributions or gifts provided by partners. Examples included: (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.

Update: This activity is active and ongoing. The activity continues to assist the Organization in establishing productive partnerships with local non-profits and ensuring residents are not negatively impacted in receiving services from these organizations.

Planned Non-Significant Changes

None.

Planned Significant Changes

None.

FY2025-1 | Early Engagement

Plan Year Approved, Implemented, Amended

This activity was approved in the FY2026 MTW Plan and was implemented later in the same fiscal year.

Description/Impact/Update

Description: This activity is designed to meet the statutory objective to promote resident economic self-sufficiency. The activity establishes a requirement that applicants complete a defined set of courses upon admission to the Public Housing or Housing Choice Voucher programs. The courses are designed to introduce incoming households to critical topics, including tenants' rights, housekeeping, safety and security, and financial literacy, and provide access to a resource fair with community service providers. The curriculum is the product of formal partnerships with other agencies that participate as instructors and advisors in the implementation of the courses. The courses will provide incoming households with the information needed to become successful residents while establishing clear expectations and starting their housing tenure with stability and a path to self-sufficiency in mind.

The resource fair will include case managers for the Family Self-Sufficiency (FSS) and Resident Opportunity Self-Sufficiency (ROSS) programs. This will allow staff to recruit for their program on-site and conduct follow-up assessments for households that express interest in the program.

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 this requirement but are encouraged to attend.



These courses will be held once a month and coordinated with Public Housing and Housing Choice Voucher staff, trainers, and resource partners.

Update: This activity is active and will be fully implemented in Q4 of FY26. The Organization plans to determine and establish metrics to track progress and success of this activity with the goal of promoting economic self-sufficiency and positive housing exits in mind. Those metrics will be reported in subsequent MTW Reports.

Planned Non-Significant Changes

None.

Planned Significant Changes

None.



B. Not Yet Implemented Activities

FY2023-1 | Income Based Housing Assistance Program (IBHA)

- i. This activity was proposed and approved in the FY23 Plan and has been “Not Yet Implemented” since approval. This activity is designed to meet the statutory objective of increasing housing choices for low-income families. The first property identified with intent to use this activity was Snowden, a senior living complex, but the policies and procedures were not developed fully in time, and the project moved forward in development with the use of traditional LNT affordability methods. The policies and procedures guiding this activity are still being drafted for potential use in new upcoming projects.
- ii. The Organization has kept this activity in the not-yet-implemented status until a final determination is made on the feasibility of the policies and procedures. The Organization is also determining which, if any, upcoming developments can utilize the financing structure of this activity. If no developments are identified by FY2030, the Organization will move to close this activity.
- iii. There have been no changes to the activity since approval.

C. Activities On Hold

FY2024-1 | Elimination of Earned Income Disregard

- i. This activity was originally approved as part of the FY2024 MTW Plan and implemented in FY2024. The activity replaced 2013-2, Simplified Earned Income Disregard, and eliminated EID for the Public Housing (PH) and Housing Choice Voucher (HCV) programs. The Organization has moved all households to triennial recertifications, and increases in income are no longer picked up in between recertifications and consequently, the policy in relation to this activity has become obsolete due to updated HOTMA regulations that have taken effect. The activity has been placed on hold to be closed out in the MTW FY2026 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.



D. Closed Out Activities

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

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 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 FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 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 FY2010-2011 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 FY2011-2012.

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 FY2013-2014 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 FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 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 FY2010-2011 MTW Plan and implemented in that fiscal year. In the FY2013-2014 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 FY2010-2011 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 FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by a new activity, FY2014-1.

9. **FY2011-5 Requirements for acceptable documents for PH and HCV**

This activity was originally approved as part of the FY2010-2011 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by a 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 FY2010-2011 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 FY2010-2011 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 FY2010-2011 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 FY2011-2012 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 the 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 FY2019-20 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 FY2019-20 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 the expiration of their term. This activity was superseded by the FY2024-1 Elimination of Earned Income Disregard activity closed out in the FY2023 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 FY2023 Report.

29. 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 on November 1, 2014. The activity was closed out in the FY2025 Report.
- ii. This activity was closed out due to continued difficulty achieving target ratios at selected communities, as elderly applicants remained low. Maintaining occupancy at these selected sites became a concern, and after internal discussion with key departments, the activity was moved to be closed to allow higher occupancy and ensure housing choice is not diminished for non-elderly applicants.
- iii. This activity established a 4-to-1 elderly admissions preference at select communities to increase housing choices for elderly residents and reduce potential lifestyle conflicts between elderly and non-elderly residents. The Organization learned that these lifestyle conflicts do still exist, but can be managed at the property level with continued elderly preference, while ensuring property staff is able to lease vacant units to non-elderly residents as needed to ensure those on our waiting list are housed faster.

30. FY2021-2 Limiting Increases in Rent

- i. This activity was approved in the FY2021-2021 Plan and was intended to be implemented in February of 2021. It was placed on hold and never fully implemented. The activity was closed in the FY2025 Report.
- ii. This activity was closed out because the Organization is no longer implementing the rental cap, so the waiver that allows the Organization to limit rental increase requests to one per year was consolidated into FY2019-2 Alternate Recertification in order to streamline reporting and management.
- iii. This activity was never fully implemented before its closeout. The Organization has no final outcomes for this activity, and pieces of it will continue in its consolidation.



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	\$13,762,350.00
70600	HUD PHA Operating Grants	\$176,082,360.00
70610	Capital Grants	\$11,941,503.00
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0.00
71100+72000	Interest Income	\$445,454.00
71600	Gain or Loss on Sale of Capital Assets	\$-937,764.00
71200+71300+71310+71400+71500	Other Income	\$2,145,817.00
70000	Total Revenue	\$203,439,720.00

Section V. A. ii. | Estimated Application of MTW Funds

The MTW PHA shall provide the estimated application of MTW funding in the plan year by Financial Data Schedule (FDS) line item. Only amounts estimated to be spent during the plan year should be identified here; unspent funds that the MTW PHA is not planning on expanding during the plan year should not be included in this section.

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$21,340,580.00
91300+91310+92000	Management Fee Expense	\$10,605,261.00
91810	Allocated Overhead	\$0.00
92500 (92100+92200+92300+92400)	Total Tenant Services	\$2,607,902.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$6,367,128.00



FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
93500+93700	Labor	\$0.00
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$24,614,065.00
95000 (95100+95200+95300+95500)	Total Protective Services	\$1,069,251.00
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$3,473,357.00
96000 (96200+96210+96300+96400+96500+96600+ 96800)	Total Other General Expenses	\$4,520,810.00
	Total Interest Expense & Amortization Cost	\$254,708.00
96700 (96710+96720+96730)		
97100+97200	Total Extraordinary Maintenance	\$0.00
97300+97350	HAP + HAP Portability-In	\$127,375,741.00
97400	Depreciation Expense	\$8,519,112.00
97500+97600+97700+97800	All Other Expense	\$0.00
90000	Total Expenses	\$210,747,915.00

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

Estimated total revenues are less than estimated total expenses. In the event that actual revenues are less than actual expenses, if the revenues are attributable to Housing Assistance Payments, the funds would be drawn from MTW HUD-held funds. If the excess expenses are attributed to Admin fees, the remaining balance would need to be covered from our own resources.

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 refurbished 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's 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*	\$10.4 million	\$10.4 million
HCV Admin Fee	\$3.6 million	\$3.6 million
PH Operating Subsidy	(\$2.4 million)	(\$2.4 million)
HUD-Held HCV Funds	\$55.4 million	\$55.4 million
TOTAL:	\$67 million	\$67 million

Description

Per Board Resolution 6763 dated June 18, 2025, Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

Sources:

- MTW Funds- \$67 million

Uses:

- Public Housing operating shortfall - \$7.2 million
 - Community Development Initiatives or CDI - \$2.3 million
 - See Section V.A.iii. | Description of Planned Application of MTW Funding Flexibility above for more details on services provided
 - Investment in Public Housing repositioning - \$5.5 million
 - Investment in Existing Property Acquisition - \$30 million
 - Investment in MTW units at Tax Credit/ Affordable Housing Communities Properties - \$8 million
 - Investment in Midcrowne and Ravello Properties for City Bond matching funds - \$5 million
 - Investment in North and South Pond at Victoria Commons - \$5 million
 - Additional Investment in the Snowden development - \$4 million
- Total MTW funds obligated are \$67 million.



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

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

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

- i. Description of RAD Participation: **The Organization is in the process of reviewing all sites to determine priority based on need and expects to begin repositioning in FY27. Conversions will begin in accordance with HUD regulations after needs assessments are completed. The conversion process is expected to be slow and methodical due to the number of properties and units the Organization manages.**
- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? **Yes**
- iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment? **First Significant Amendment**



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).

*This section will be updated after the public comment period closes and the Board of Commissioners approves the FY27 MTW Plan for submission to HUD.



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 Wednesday, Feb. 18, 2026, and ended on Friday, March 20, 2026, on the Opportunity Home San Antonio's Proposed 2026 – 2027 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan (ACOP), Housing Choice Voucher Administrative Plan, Capital Fund Program (CFP) Plan and the Family Self-Sufficiency (FSS) Program Action Plan.

A Public Hearing of the Board of Commissioners was held at Opportunity Home Central Office, 818 S Flores St., San Antonio, TX, 78204 prior to 2:00 p.m., commencing on March 4, 2026. There were X (#) resident attendees and X (#) public comments.

*The highlighted portion will be updated after the public comment closes.

See Appendix A for more information.



Section VI. C. | Planned And Ongoing Evaluations

The Organization plans to conduct evaluations of one to two MTW activities per fiscal year. Selection of activities scheduled to be evaluated each fiscal year will be completed by the end of the fiscal year prior. Evaluations will remain ongoing to ensure active MTW activities are achieving their intended outcomes.

In FY27, the Organization plans to evaluate Activity 2011-9 to ensure housing partners are delivering effective services to households that have been referred. Results will be included in the FY27 MTW Report.



Section VI. D. | Lobbying Disclosures

DISCLOSURE OF LOBBYING ACTIVITIES		
Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352		OMB Number: 4040-0013 Expiration Date: 02/28/2025
Review Public Burden Disclosure Statement		
1. * Type of Federal Action: ☐ a. contract ☒ b. grant ☐ c. cooperative agreement ☐ d. loan ☐ e. loan guarantee ☐ f. loan insurance	2. * Status of Federal Action: ☐ a. bid/offer/application ☒ b. initial award ☐ c. post-award	3. * Report Type: ☒ a. initial filing ☐ b. material change
4. Name and Address of Reporting Entity: ☒ Prime ☐ SubAwardee * Name: Opportunity House San Antonio * Street 1: 818 South Flores Street Street 2: * City: San Antonio State: TX: Texas Zip: 78204 Congressional District, if known:		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:		
6. * Federal Department/Agency: US Dept of Housing/Urban Development/FIM		7. * Federal Program Name/Description: Moving to Work (MTW) Program Assistance Listing Number, if applicable:
8. Federal Action Number, if known:		9. Award Amount, if known: \$
10. a. Name and Address of Lobbying Registrant: Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
b. Individual Performing Services (including address if different from No. 10a) Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact, upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		
* Signature: Michael Reyes * Name: Michael Reyes * First Name: Michael Middle Name: * Last Name: Reyes Suffix:		
Title: Acting President & CEO		Telephone No.: 210-477-6130
Date: 4/4/2025		
Federal Use Only:		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)



DocuSign Envelope ID: 60F8E3A3-8175-403B-A999-4B023BFA6291

**Certification of Payments
to Influence Federal Transactions****Department of Housing
and Urban Development
Office of Public and Indian Housing**

Public reporting burden for this information collection is estimated to average 30 minutes including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure Federal Aids are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Report Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4118, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

Opportunity Home San Antonio

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)

Name of Authorized Official

Michael Reyes

Title

Acting President & CEO

Signature

DocuSigned by:

Michael Reyes

334061EEC0A01472

Date (mm/dd/yyyy)

4/4/2025

Previous edition is obsolete

form HUD 50071 (01/14)



Appendix | Additional Items

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

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

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

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

[Appendix E | Asset Management Plan](#)

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

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

[Appendix H | Resident Advisory Board](#)

[Appendix I | Rental Assistance Demonstration \(RAD\) & Section 18 Repositioning](#)



Appendix A | Public Comments Summary Report

MTW Timeline

Date	Description	Outreach	Attendees
February 18, 2026		Comment period opened	
February 20, 2026	Public Housing Resident Briefing (Lila Cockrell)	Email, property flyers, website	14 residents
February 20, 2026	Resident Advisory Board (RAB) Briefing	Invitation to Board members	6 RAB members
February 24, 2026	Public Housing Resident Briefing (Villa Veramendi)	Email, property flyers, website	0 residents
February 26, 2026	Public Housing Resident Briefing (Cassiano)	Email, property flyers, website	
March 5, 2026	Public Housing Resident Briefing (Madonna)	Email, property flyers, website	
March 10, 2026	Public Housing Resident Briefing (OP Schnabel)	Email, property flyers, website	
March 12, 2026	Public Housing Resident Briefing (Fair Ave)	Email, property flyers, website	
March 13, 2026	HCV Resident Briefing	Email, website	
March 20, 2026		Comment period closed	
TBD		Final Board Approval	
TBD		HUD Submission	

Materials posted

- Public hearing and public comment period notice
- Draft FY2027 MTW Plan
- MTW Plan Update Summary
- ACOP & Admin Plan Revision Summary
- FSS Action Plan Revision Summary
- Presentation Video Recording

Feedback Overview



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

Feedback Overview	Adjustments to Plan
To be updated after the public comment period closes	



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

Summary of Revisions to FY 2026 - 2027 Admissions & Continued Occupancy Plan (ACOP)

Indicates policy has been added

~~Indicates policy has been removed~~

Important Note: All changes outlined in this summary are proposed. Resident feedback will be reviewed before implementation and board approval.

Repayment Agreements (RPAs) for Applicants

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

The language in section 3.3.D(4)(d)(ii) will be revised to prohibit applicants with outstanding debts to Opportunity Home from entering into repayment agreements at the time of admission. All balances related to any Opportunity Home housing program must be paid in full before an applicant can be admitted to Public Housing.

3.3.D Other Permitted Reasons for Denial Of Admission

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

- (d) There is a disability-related need for the accommodation.
 - (ii) Owes rent or other amounts to Opportunity Home in connection with Section 8 or other public housing assistance under the 1937 Act; ~~unless the family enters into a repayment agreement upon admission.~~

Repayment Agreements for Transfers

Reason for the update to 12.4.G Eligibility for Continued Occupancy



This change will affect residents. Section 12.4.G(c) will be updated to require that any Public Housing resident requesting a transfer to a different Public Housing community must satisfy all outstanding debts owed to Opportunity Home in full prior to being determined eligible for the transfer. Residents will not be permitted to enter into a Repayment Agreement to meet this eligibility requirement.

12.4.G Eligibility for Continued Occupancy

- (c) Not owe any back rent, fees, or charges for move-out damages to the previous unit; ~~unless a repayment agreement is established within five business days of signing a Lease to a new unit.~~

~~(i) Violations of the repayment agreement will be subject to lease termination as described in the Public Housing Lease and within Chapter 16.~~

Termination due to Breach of Repayment Agreement

Reason for change to the termination policy for breach of an RPA.

This change will affect residents. The language in section 13.3.C(2)(vii) will be updated to align with HUD regulations (PIH 2018-18), which require PHAs to terminate assistance for breach of a repayment agreement.

13.3.C(2)

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

Opportunity Home will terminate the lease for the following reasons:

(vii) If the family has breached the terms of a repayment agreement entered into with Opportunity Home.

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



~~(xi) If the family has breached the terms of a repayment agreement entered into with Opportunity Home.~~

Repayment Agreements for Residents

Reason for the Change to 16.3.B Family Debts to Opportunity Home

These changes may affect residents. Section 16.3.B(1-3),(e)(i)(C),(f)(1),(2)(i), and (v)(B) have been updated to state that residents will not be eligible for a Repayment Agreement for any debts owed that are not the result of under-reported or unreported income. Existing repayment agreements for other debt types will remain in effect until completed or breached.

16.3.B Family Debts to Opportunity Home

- (1) Any amount owed to Opportunity Home by a public housing family must be repaid. ~~If the family is unable to repay the debt within 30 days, Opportunity Home will offer to enter into a repayment agreement in accordance with the policies below.~~
- (2) If a family exceeds three months of **rental** debt, housing assistance may be terminated in accordance with the policies in Chapters 8 and 13.
- (3) If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, Opportunity Home will terminate the family's tenancy in accordance with the policies in Chapter 13. Opportunity Home ~~will~~ may also pursue other modes of collection.

(e) *Late or Missed Payments*

- (i) If the payment is not received by the end of the business day on the due date, the following actions will occur:
 - (A) The repayment agreement will be considered in default;
 - (B) The debt will be due in full;
 - (C) Opportunity Home ~~may~~ will terminate tenancy in accordance with the policies in Chapter 13.



(f) **No Offer of Repayment Agreement**

- (1) Opportunity Home will **only** offer the family a repayment agreement for debts owed due to under-reported or unreported income.
- (2) Opportunity Home will **not** offer the family a repayment agreement when the following circumstances apply:
- (i) The family owes rent, late charges, maintenance, or other charges due under the lease that are not the result of under-reported or unreported income.
 - (A) Families with active Repayment agreements for the charges listed above must remain in compliance with their Repayment Agreement until payments conclude.
 - (B) No new Repayment Agreements for charges other than under-reported or unreported income will be executed.
 - (i) The family has an existing repayment agreement with Opportunity Home; or
 - (ii) The amount owed by the family exceeds \$3,000.
 - (A) If the amount owed by the family exceeds \$3,000, the family may pay to reduce the total amount owed to or below the \$3,000 cap in addition to the down payment to become eligible for a repayment agreement.
 - (v) The amount owed by families with debt from March 2020 - June 30, 2024, exceeds \$6,000.
 - (A) If the amount owed by the family exceeds \$6,000, the family may pay to reduce the total amount owed to or below the \$6,000 cap in addition to the down payment to become eligible for a repayment agreement.
 - (B) Applicable families must remain in compliance with their Repayment Agreement until payments conclude. No new Repayment Agreements for charges other than under-reported or unreported income will be executed.
 - (vi) The family has already executed a repayment agreement and fails to pay the monthly payment on the due date agreed upon between the family and Opportunity Home.



Alternatives to Termination of Tenancy

Reason For Change To Alternatives To Termination Of Tenancy

This change may affect residents. Section 13.3.D(2)(a) will be updated to reflect the proposed policy update, which is to permit repayment agreements only in instances of unreported or under-reported income. This means a Repayment Agreement will serve as an alternative to termination exclusively for qualifying cases of unreported or under-reported income.

13.3.D Alternatives to Termination of Tenancy

(2) Repayment of Family Debts

- (a) If a family owes amounts to Opportunity Home or Opportunity Home-managed properties, as a condition of continued occupancy, Opportunity Home will require the family to repay the full amount or to enter into a repayment agreement within 14 days of receiving notice from Opportunity Home of the amount owed for cases of rent underpayments by the tenant caused by under-reported or unreported income. See Chapter 16 for policies on repayment agreements.

Interim Reexaminations due to Increases in Income

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

This change may affect residents. Sections 9.3.C(3)(b)(i)(A)&(B) will be updated to require residents to report increases in monthly income of \$200 or more within 10 business days after the change takes effect.

9.3.C

(3) Family-Initiated Interim Reexaminations

- (a) Opportunity Home must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 960.257(c)]. In addition, HUD regulations require that the family be permitted to



obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 960.257(b)]

(b) **Required Reporting**

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

- (A) Families are required to report increases in monthly income of \$200 or more in earned and unearned income within 10 business days of the date the change takes effect. Families are not required to report increases in earned and unearned income, including new employment.
- (B) Opportunity Home will not process increases in income under \$200 in earned and unearned monthly income, including new employment.

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) will be updated to state that Opportunity Home will only extend one unit offer.

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 based on the availability and family composition.
 - (b) The applicant will be given one unit offer ~~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.



Utility Reimbursements

Reason for the Change to Utility Reimbursements

This change may affect residents. Section 6.3.A(1)&(5) will be updated to align with the proposed MTW activity “FY2027-1: Elimination of Negative Rent”, which would eliminate utility reimbursements for non-elderly and non-disabled families as defined by HUD regulations. Note that implementation of this policy will take place at a later date, once programming updates are completed.

6.3.A Overview of Income-Based Rent Calculations

- (1) The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant's rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by Opportunity Home.

(a) Per MTW Activity “FY2027-1: Elimination of Negative Rent”, Opportunity Home will follow the guidelines below for TTP calculations that result in a negative number (utility reimbursements):

- (i) **For Non-Elderly/Non-Disabled Households:** The TTP and UA will be calculated as usual. If the calculation results in a negative rent (utility reimbursement), the reimbursement will not be issued.
- (ii) **For Elderly/Disabled Households:** These households will continue to receive UAP reimbursements if their utility allowance exceeds their TTP, in accordance with standard HUD guidelines.

(b) Non-Elderly/Non-Disabled households may request a hardship exemption for utility reimbursements if one of the following criteria are met:

- (i) The household is at imminent risk of utility shut-off for essential services (heat, water, electricity).
- (ii) The household is at imminent risk of eviction due to an inability to cover the gap between the UA and actual costs during a period of zero income.
- (iii) Loss of income that has lasted more than 30 days.



(c) If the household is determined eligible, Opportunity Home may pay the utility reimbursement to the family directly.

(5) **Utility Reimbursement [24 CFR 960.253(c)(4)]**

(a) Utility reimbursement occurs when any applicable utility allowance for tenant-paid utilities exceeds the TTP. HUD permits Opportunity Home to pay the reimbursement to the family or directly to the utility provider.

(b) Opportunity Home will make utility reimbursements to elderly and disabled households as defined by HUD regulations, in accordance with "FY2027-1: Elimination of Negative Rent". ~~to the family.~~

(c) Opportunity Home may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$45.00 or less. Reimbursements must be made once per calendar-year quarter, either prospectively or retroactively, and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. Opportunity Home must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship. Opportunity Home must issue reimbursements that exceed \$45.00 per month on a monthly basis.

(d) Opportunity Home will issue all utility reimbursements monthly, if applicable.



Summary of Revisions to the FY25-26 Public Housing Lease

Indicates policy has been added

~~Indicates policy has been removed~~

Important Note: All changes outlined in this summary are proposed. Resident feedback will be reviewed before implementation and board approval. All proposed lease changes may affect current residents.

Recording on Property

Reason for the Change to PH Lease Part II(IX)(dd)

New language was added to PH Lease Part II section (IX)(dd) to protect the privacy and peaceful enjoyment of the premises by prohibiting recording residents or staff without their knowledge and consent. An exception is made only for documenting evidence of criminal activity for law enforcement as permitted by law.

IX. Tenant's Obligations

Tenant will be obligated:

(dd) To refrain from the unauthorized audio or video recording of any resident, guest, or Opportunity Home staff member while on Opportunity Home property. Except where permitted by law to document evidence of criminal activity for law enforcement, any recording conducted without the express knowledge and consent of all parties is prohibited. Such actions are deemed a disturbance of the peaceful enjoyment of the community and may be classified as harassment. (Examples of prohibited behavior may include secretly recording conversations, filming individuals without consent with a cellphone or other device, or live-streaming interactions).

Doorbell Cameras

Reason for the Change to PH Lease Part II(IX)(l)

New language will be added to the Lease Part II section (IX)(l) to allow residents to install doorbell cameras with prior written approval from Opportunity Home. The update also stipulates that residents must agree and sign an acknowledgement form if approved for a doorbell camera.

IX. Tenant's Obligations



Tenant will be obligated:

- (l) To make no alterations or repairs, or redecorations to the interior of the dwelling unit or to the equipment, nor to install additional equipment or major appliances without the written consent of Opportunity Home. To make no changes to locks or install new locks on exterior doors without Opportunity Home's written approval. To use no nails, tacks, screws, brackets, or fasteners on any part of the dwelling unit (a reasonable number of picture hangers excepted) without authorization by Opportunity Home.
 - 1. To obtain prior written approval and sign an acknowledgement form before installing any doorbell camera, which must be mounted using "no-drill" hardware and positioned so as not to view neighboring unit interiors or areas with a reasonable expectation of privacy; Opportunity Home reserves the right to revoke this approval at any time.

Mini/Portable Washer and Dryers

Reason for the Change to PH Lease Part II(IX)(g)

New language was added to PH Lease Part II section (IX)(g) prohibiting the use of mini/portable washers and dryers. This measure ensures that electrical and plumbing systems are used only for their intended purposes and prevents unauthorized equipment from straining building infrastructure.

IX. Tenant's Obligations

Tenant will be obligated:

- (g) To use only in a reasonable manner all electrical, sanitary, heating, ventilating, air-conditioning, and other facilities and appurtenances, including elevators [966.4(f)(8)]. The use of mini/portable washers and dryers where no facilities are intended for that purpose is strictly prohibited.

Keys and Methods of Entry to the Premises

Reason for the Change to PH Lease Part II(IX)(ee)

Lease Part II section (IX)(ee) was added to strengthen property security. This new provision mandates that residents maintain exclusive possession of all access devices and strictly prohibits the duplication or sharing of keys and fobs with non-residents. Additionally, it prohibits behaviors that compromise building security, such as propping doors or allowing unauthorized 'tailgating' into the premises.

IX. Tenant's Obligations

Tenant will be obligated:



- (ee) To maintain exclusive possession of all keys, fobs, and access devices. All Household members are strictly prohibited from duplicating or providing access devices to any guest, non-resident, or individual not listed on the lease. Tenants shall not engage in any conduct that allows unauthorized entry to the premises, such as propping doors open or permitting non-residents to follow behind them.

Opportunity Home Maintenance and Systems

Reason for the Change to PH Lease Part II(IX)(x)

New language is being added to section Lease Part II section (IX)(x) to prohibit the unauthorized tampering with, or adjustment of, any Opportunity Home systems and equipment. The language further requires that residents notify property staff of all maintenance issues via a formal work order and refrain from contacting or hiring any outside vendor for repairs without prior written approval from Opportunity Home. This update is intended to ensure that all repairs meet Opportunity Home's safety and quality standards.

IX. Tenant's Obligations

Tenant will be obligated:

- (x) To use reasonable care to keep his dwelling unit in such condition as to ensure proper health and sanitation standards for Tenant, household members, and neighbors. **Tenant will notify the authority promptly of known need for repairs to the dwelling unit**, and of known unsafe or unsanitary conditions in the dwelling unit or in common areas and grounds of the Project. Tenant's failure to report the need for repairs in a timely manner will be considered to contribute to any damage that occurs.
1. Unauthorized contact, tampering, adjustment, or interference with any property, equipment, or utility systems, including but not limited to HVAC units, air filters, electrical panels, meters, and plumbing, is strictly prohibited.
 2. Tenants must immediately report all maintenance issues to Opportunity Home by submitting a formal maintenance request to ensure repairs are handled by authorized Opportunity Home personnel. Tenants are not authorized to contract any outside vendor or third party to perform repairs or maintenance on the premises without prior written approval from Opportunity Home.

Solicitation

Reason for the Change to PH Lease Part II(IX)(cc)



New language was added to Lease Part II section (IX)(cc) prohibiting the placement of any signs, flyers, or advertisements throughout the property and common areas without prior written approval. It further prohibits engaging in or allowing any unauthorized commercial solicitation, door-to-door sales, or the distribution of unapproved marketing materials; this includes a restriction on surveying other residents without management consent, unless such outreach is specifically protected by federal law for resident organizing (e.g., resident councils).

IX. Tenant's Obligations

Tenant will be obligated:

- (s) To refrain from placing signs of any type in or about the dwelling, throughout the property, and common areas except those allowed under applicable zoning ordinances, and then only after having received written permission from Opportunity Home.
 - (i) To refrain from engaging in, or allowing, any unauthorized commercial solicitation, door-to-door sales, or the distribution of unapproved marketing materials on the premises; Tenant acknowledges that such activities, including surveying other residents without prior written consent from management, disturb the peaceful enjoyment and privacy of the community and are strictly prohibited, except where such outreach is specifically protected by federal law for the purpose of resident organizing.



Appendix C | Summary of Revisions to the Administrative Plan

Summary of Revisions to FY 2026 - 2027 Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Important Note: All changes outlined in this summary are proposed. Resident feedback will be reviewed before implementation and board approval.

Centralized Project-Based Vouchers (PBV) Waiting List

Reason for the Change to 18.6.C - Organization of the Waiting List [24 CFR 983.251(c)]

Changes to section 18.6.C may impact applicants. The updated language would allow Opportunity Home to operate one centralized waiting list, with subparts, for the PBV program. The centralized waiting list will address the administrative burden of maintaining multiple waiting lists.

18.6.C Organization of the Waiting List [24 CFR 983.251(c)]

- (1) Opportunity Home may establish a separate waiting list for PBV units, or it may use the same waiting list for both tenant-based and PBV assistance. Opportunity Home may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by Opportunity Home. If Opportunity Home chooses to offer a separate waiting list for PBV assistance, Opportunity Home must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.
- (2) If Opportunity Home decides to establish a separate PBV waiting list, Opportunity Home may use a single waiting list for Opportunity Home's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.
- (3) Opportunity Home will maintain a community-wide waiting list for the organization's PBV program. Within that list, Opportunity Home will designate subparts to easily identify who should be offered the next



available unit (e.g., general-occupancy developments, elderly/disabled developments).

- ~~(3) Opportunity Home will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. Opportunity Home currently has waiting lists for the following PBV projects:~~
- ~~(a) Gardens of San Juan~~
 - ~~(b) Wheatley Park~~
 - ~~(c) East Meadows~~
 - ~~(d) Beacon Communities~~

Request for Tenancy Approval Submission

Reason for the Change of 9.1.B - Requesting Tenancy Approval [Form HUD-52517]

The modification in section 9.1.B could impact program participants and landlords. The revised language permits Opportunity Home to set the process for submitting the Request for Tenancy Approval (RTA). The organization accepts electronic submissions of RTAs and any necessary corrections.

9.1.B Requesting Tenancy Approval [Form HUD-52517]

- (9) Both the RTA and the proposed lease must be submitted no later than the expiration date stated on the voucher. [HCV GB p.8-15]

- (a) Both the family and the owner must sign the RTA.
- (b) The completed RTA packet (including the proposed lease) should be submitted in the form and manner required by Opportunity Home, in-person, by fax, or by email.
- (c) The family may not submit, and Opportunity Home will not process more than one RTA at a time.
- (d) Opportunity Home will suspend the voucher term upon a family's submission of an RTA.
 - (i) The suspension begins when the family submits the RTA and ends when the family is notified in writing of the approval or denial of the tenancy.
- (e) When the family submits an RTA, Opportunity Home will review the RTA for completeness.



- (i) If the RTA is incomplete (including a lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RTA, Opportunity Home will notify the family and/or the owner of the deficiencies.
- (ii) Missing information and/or missing documents will only be accepted through an electronic corrections process as determined by Opportunity Home. ~~as hard copies, in-person, by mail, by email, or by fax.~~ Opportunity Home will not accept missing information provided verbally over the phone.
- (f) When the family submits the RTA and proposed lease, Opportunity Home will also review the terms of the RTA for consistency with the terms of the proposed lease.
 - (i) If the terms of the RTA are not consistent with the terms of the proposed lease, Opportunity Home will notify the family and the owner of the discrepancies.
 - (ii) Corrections to the terms of the proposed lease will only be accepted through an electronic corrections process as determined by Opportunity Home. ~~in-person, by mail, by fax, or by email.~~
 - (iii) Corrections to the RTA will only be accepted through an electronic corrections process as determined by Opportunity Home. ~~may be accepted as hard copies, in-person, by mail, by fax, or by email.~~
- (g) Because of the time-sensitive nature of the tenancy approval process, Opportunity Home will attempt to communicate with the owner and family by phone, fax, or email. Opportunity Home will use mail when the parties cannot be reached by phone, fax, or email.
- (h) Opportunity Home will consider an exception to this policy as a reasonable accommodation to a person with disabilities (see Chapter 2).

Project-Based Vouchers Rent Limits

Reason for the Change to 18.8.B - Rent Limits [24 CFR 983.301]

Changes to Section 18.8.B may impact participants. Language has been revised to note that Opportunity Home will apply the higher of the approved SAFMRs or MAFMRs to establish rent amounts for the PBV program.

18.8.B Rent Limits [24 CFR 983.301]



(1) Except for certain tax credit units (discussed below), the rent to owner must not exceed the lowest of the following amounts:

- (a) An amount determined by Opportunity Home, not to exceed 110 percent of the applicable fair market rent (or any HUD-approved exception payment standard) for the unit bedroom size minus any utility allowance;
- (b) The reasonable rent; or
- (c) The rent requested by the owner.

(d) Opportunity Home will apply the higher of the approved SAFMRs or MAFMRs to Opportunity Home's PBV program.

Veterans Affairs Supportive Housing (VASH) Program

Reason for the Change to 19.6.F - Income Eligibility

The language below has been updated to comply with the VASH income eligibility updates established by HUD through the Federal Register notice titled "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program."

19.6.F Income Eligibility [FR Notice 8/13/24]

~~Opportunity Home will determine income eligibility for the HUD-VASH program as it does for the Housing Choice Voucher Program in accordance with 24 CFR 982.201.~~

- (1) With some exceptions, Opportunity Home must determine income eligibility for VASH families in accordance with 24 CFR 982.201 and policies in Section 3.2. A.
- (2) Low-income families (80 percent of AMI) are eligible for assistance under VASH, and Opportunity Home may not condition eligibility based on additional eligibility criteria specified in its administrative plan.
- (3) If the family is over-income based on the most recently published income limits for the family size, the family will be ineligible for assistance.
- (4) The following alternative requirements related to income apply to VASH families:



- (a) Opportunity Home must determine the applicant's annual income for purposes of income eligibility by excluding all VA service-connected benefits (i.e., disability benefits for service-connected conditions, illnesses, or injuries caused or worsened by active military service) received by the applicant. This special income exclusion only applies to the definition of annual income for purposes of determining income eligibility. If the HUD-VASH applicant qualifies as a low-income family under the alternative requirement, the VA service-connected benefits (with the exception of the normally excluded deferred VA disability payments under 24 CFR 5.609(b)(16) and the payments related to aid and attendance under 24 CFR 5.609(b)(17)) must still be included as annual income when calculating the family's adjusted income. In other words, the VA service-connected disability benefits are excluded for purposes of determining income eligibility but included for purposes of calculating the family's total tenant payment (TTP), housing assistance payment (HAP), and family share.
- (b) When a veteran family reports that they have zero income, Opportunity Home must accept a self-certification of zero income from the family at admission and at reexamination without taking any additional steps to verify the family is indeed zero income. The self-certification does not need to be notarized. Opportunity Home must verify families' income in the Enterprise Income Verification (EIV) system within 120 days after admission. Opportunity Home may not deny zero-income families.
- (c) Regardless of Opportunity Home policy, in determining compliance with the asset limitation at admission, for the VASH program, Opportunity Home must accept a self-certification by the family that the family's total assets are equal to or less than the HUD-published asset limitation amount (adjusted annually) and that the family does not have any present ownership interest in real property, without taking additional steps to verify the accuracy of the declaration.
- (d) Opportunity Home must not enforce the asset limitation for VASH families at reexamination.
- (e) In addition, because there needs to be a monthly housing assistance payment (HAP) in order to enter into a HAP contract on behalf of a tenant-based voucher family, the utilization of tenant-based VASH assistance by families determined



income-eligible is limited to those areas where the family's (TTP) is less than the applicable payment standard or exception payment standard (including any VASH-specific exception payment standard established by Opportunity Home). The family must select a unit with a gross rent that is above the family's TTP in order to lease a unit with the tenant-based VASH voucher.

- (5) While income-targeting does not apply to VASH vouchers, Opportunity Home may include the admission of extremely low-income VASH families in its income targeting numbers for the fiscal year in which these families are admitted.

19.6.G Minimum Rent [FR Notice 8/13/24]

- (1) Opportunity Home must consider hardship circumstances before charging a minimum rent in accordance with 24 CFR 5.630(b). Opportunity Home may choose to charge a lower minimum rent (including a minimum rent of \$0) specifically for their VASH program, regardless of the minimum rent policies established in their administrative plan for other HCV families.

(a) Opportunity Home will establish a minimum rent of \$0 for VASH families.

Owner Responsibilities

Reason for the Change to 13.1.C - Owner Responsibilities and 13.1.D Owner Qualifications

This update to Section 13.1.C may impact program landlords. The policy changes in this section are intended to streamline documentation requirements for new and existing owners participating in the Housing Choice Voucher (HCV) program.

13.1.C Owner Responsibilities [24 CFR 982.452]

The owner responsibilities in the HCV program are outlined in the regulations, HAP Contract (Form HUD-52641), and Tenancy Addendum (Form HUD 52641-A), as follows:

- (1) **Housing Assistance Payment (HAP) Contracts, Lease, and Tenancy Addendum**

- (b) ***Prepare and Furnish to Opportunity Home the Information Required Under the HAP Contract***



- (i) The owner is responsible for preparing and furnishing to Opportunity Home the information required under the HAP contract.

- (ii) Opportunity Home will not execute the HAP Contract until the owner has submitted ~~an~~:

- (A) A copy of the HUD settlement statement, including the signature of the seller, buyer, and title agent, or other document showing the transfer of title and recorded deed;
- (B) A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;
- (C) Verification of EIN/SSN;
 - (1) This may include an official IRS letter, Social Security card, or the most recent filed tax return
- (D) A written agreement to comply with the terms of the HAP contract; and
- (E) Confirmation that the new owner is not a prohibited relative.
- ~~(A) IRS Form W-9~~
- ~~(B) Verification of Tax ID, and~~
- ~~(C) Direct Deposit form.~~

13.1.D Owner Qualifications

- (1) Opportunity Home does not formally approve an owner to participate in the HCV program.
- (2) There are a number of criteria where Opportunity Home may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues.
- (3) No owner has a right to participate in the HCV program [24 CFR 982.306(e)].

(8) Legal Ownership of Unit



- (a) Opportunity Home will only enter into a contractual relationship with the legal owner of a qualified unit, or their designated representative.
 - (b) If a party other than the owner will manage the property, the owner must provide:
 - (i) A copy of the most current management agreement form (for example, Texas Association of Realtors or Texas Real Estate Commission forms if a member); or
 - (ii) An affidavit, a notarized statement or power of attorney specifying the designee(s), signed by the owner.
 - ~~(c) The above documents are not required for apartment complexes, which are properties with more than four units.~~
- ***

College & University Homeless Assistance Program (CHAP)

Reason for the Change to 19.2 - College & University Homeless Assistance Program

Section 19.2 has been updated to allow referrals to the CHAP program from all Alamo Community Colleges, and to add the University of Texas at San Antonio (UTSA) and Texas A&M University - San Antonio (TAMUSA) to the program.

19.2 College & University Homeless Assistance Programs

19.2.A Overview

- (1) The College & University Homeless Assistance Programs are set-aside voucher programs for homeless students attending any of the Alamo Community Colleges, [the University of Texas at San Antonio \(UTSA\), or Texas A&M University-San Antonio \(TAMUSA\).](#)
- (2) Opportunity Home has the following major responsibilities in administering the College & University Homeless Assistance Programs:
 - (a) Developing and implementing policies and procedures in accordance with HUD's regulations and guidance;
 - (b) Managing relevant data on program participants;



- (c) Managing all aspects of the participant's housing assistance, including the following:
 - (i) Conducting eligibility determinations;
 - (ii) Conducting inspections;
 - (iii) Calculating tenant rent and Housing Assistance Payments (HAP);
 - (iv) Releasing HAP to landlords.
- (3) Other major responsibilities for administering the College & University Homeless Assistance Programs are established by the Memorandums of Understanding (MOU).

19.2.B Intake and Screening Procedures

(1) Eligibility

- (a) Applicants must meet Opportunity Home eligibility criteria in accordance with 3.2 of this Administrative Plan.
- (b) For purposes of determining eligibility of a person under 3.2.E, any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives will be considered income to that individual, except for a person over the age of 23 with dependent children.
 - (i) If a student is determined to be independent from their parents, then the income of the student's parents will not be considered in determining the student's eligibility. See 3.2(4)(b) for "independent child" criteria.

(2) Intake Procedure

- (a) Applicants must complete a College & University Housing Assistance Programs application following the Census Date of the semester.
- (b) ~~Either Palo Alto College or St. Philip's College~~ Participating institutions will verify and document the following eligibility requirements:
 - (i) Applicant is enrolled in at least six credit hours as part of a degree or certificate program;
 - (A) Applicants who have already been awarded a degree or certificate are ineligible unless



approved by the Dean or Vice President for Student Success (VPSS).

~~(B) While preference will be given to applicants enrolled at Palo Alto College or St. Philip's College, applicants enrolled at any Alamo Colleges District institution may be considered for assistance if capacity exists.~~

- (ii) Applicant may not be in arrears or owe funds to any public housing agency;
- (iii) Applicant must have a completed Free Application for Federal Student Aid (FAFSA) on file;
- (iv) Applicant must have a cumulative Grade Point Average (GPA) of 2.0 or higher;

(A) If an applicant does not meet the GPA requirement, the applicant may request an appeal for continued participation in the program.

- (v) Applicants must submit a brief 3-5 sentence statement explaining the housing insecurity circumstances as it relates to the definition of "homelessness" provided; and

- (vi) Applicants must consent to the FERPA Release statement on the application.

- (c) ~~The institution Either Palo Alto College or St. Philip's College~~ will send a referral packet to Opportunity Home indicating that the applicant meets the eligibility criteria above.

(3) Eligibility Appointment

- (a) Once the applicant has been referred to Opportunity Home by ~~the institution Palo Alto College or St. Philip's College~~, the applicant will be scheduled for an eligibility appointment to verify the applicant meets Opportunity Home eligibility requirements and to determine affordability for a unit.
- (b) Once eligibility is determined, Opportunity Home will issue the applicant a voucher to search for an acceptable unit.

19.2.C Program Administration



- (1) The program will be administered in accordance with this Administrative Plan and MTW policy, unless otherwise stated.
- (2) **Rent Calculation**
 - (a) Opportunity Home will examine a participant's income to determine the amount of the contribution toward rent payable by the participant in accordance with FY 2014-6.
 - (b) Adjustments to a participant's contribution toward rental payment must be made in accordance with this Administrative Plan.
 - (c) Each program participant must agree to supply the information or documentation necessary to verify the participant's income.
- (2) **Term of Assistance**
 - (a) The program participant will be assisted for the amount of time agreed upon per their degree plan.
- (3) **Lease Agreements**
 - (a) Leases executed under this program will follow standards as regulated by 24 CFR 982.308 & 24 CFR 982.310.
 - (b) The lease may be determined to have a one-year term or an alternative term length to accommodate the school semester time frame.
 - (c) If Opportunity Home terminates the Housing Assistance Payment (HAP) contract due to program violations, the lease will automatically terminate.
- (4) **Continued Eligibility**
 - (a) Participants must retain a cumulative GPA of 2.0 or higher throughout program participation.
 - (b) Participants are required to move to full-time enrollment by their third semester if not at full-time enrollment at the time of application.
 - (c) Participants must meet with a Financial Literacy Sr. Advisor ~~at either Palo Alto College or St. Philip's College~~ for an advising session and/or participate in financial coaching workshops.

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 one year ~~6 months~~ after the participant's graduation.

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]**

(e) Preferences may be verified prior to selection but must be verified by the time of selection from the waiting list. If a selected preference cannot be verified by Opportunity Home at the time the applicant is selected from the waiting list, the applicant will be returned to the waiting list in the order they would have been ranked had the preference not been selected.

(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.

- (iii) **College & University Homeless Assistance Program (75 Points)** – Homeless students referred by any of the participating colleges or universities, ~~Alamo Community Colleges~~ who are currently enrolled in at least six credit hours in a degree or certificate program.



Minimum Rent for MTW Programs

Reason for Change to 6.3.A - Overview of Rent and Subsidy Calculations

This update to Section 6.3.A may affect participants. This change to Section 6.3.A(1)(e) clarifies the minimum rent for Moving to Work (MTW) voucher programs administered by Opportunity Home, and aligns with the minimum rent for the standard HCV program.

6.3.A Overview of Rent and Subsidy Calculations

(1) TTP Formula [24 CFR 5.628]

- (a) HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:
 - (i) 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
 - (ii) 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
 - (iii) The welfare rent (in as-paid states only)
 - (iv) A minimum rent between \$0 and \$50 that is established by Opportunity Home

(e) Minimum Rent [24 CFR 5.630]

The minimum rent for this locality is \$50.

The minimum rent for this locality is \$50. The minimum rent hardship exemption policies outlined in section 6.3.B are applicable.

Debts Owed to Opportunity Home

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

This section update may affect applicants. The language in Section 3.3.D(4) has been revised to allow Opportunity Home to deny admission to the voucher programs when applicants owe rent or other amounts to Opportunity Home.

3.3.D Other Permitted Reasons for Denial of Admission



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

HUD authorizes Opportunity Home to deny assistance based on the family's previous behavior in assisted housing.

Opportunity Home is not permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [24 CFR 984.101(d)].

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

- (vi) The family owes rent or other amounts to any other PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt prior to being selected from the waiting list.
- (vii) The family owes rent or other amounts to Opportunity Home in connection with Section 8 or other public housing assistance under the 1937 Act, ~~unless the family enters into a repayment agreement upon admission.~~
- (viii) If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.
 - (A) In the case of vacancy loss/damage amounts accrued under the MOD-Rehab program, the family will be permitted to enter into a repayment agreement with Opportunity Home.

Non-Elderly Disabled (NED) Vouchers

Reason for the Addition of Section 19.9 - Non-Elderly Disabled (NED) Vouchers

Section 19.9 outlines the policy for administering the Non-Elderly Disabled (NED) Voucher program. NED vouchers serve families with a head of household, co-head of household, or spouse who is a non-elderly person with a disability.



19.7 Non-Elderly Disabled (NED) Vouchers

19.9.A Program Overview [Notice PIH 2013-19]

- (1) NED vouchers help non-elderly disabled families lease suitable, accessible, and affordable housing in the private market. Aside from separate funding appropriations and serving a specific population, NED vouchers follow the same program requirements as standard vouchers. Opportunity Home does not have special authority to treat families that receive a NED voucher differently from other applicants and participants.
- (2) Some NED vouchers are awarded to PHAs through competitive NOFAs. The NOFA for FY2009 Rental Assistance for NED made incremental funding available for two categories of NED families:
 - (a) **Category 1** vouchers enable non-elderly persons or families with disabilities to access affordable housing on the private market.
 - (b) **Category 2** vouchers enable non-elderly persons with disabilities currently residing in nursing homes or other healthcare institutions to transition into the community. PHAs with NED Category 2 vouchers were required to partner with a state Medicaid or health agency or the state Money Follows the Person (MFP) Demonstration agency.
 - (i) Opportunity Home's policy within this chapter pertains solely to NED Category 1 vouchers, as the organization does not administer NED Category 2 vouchers.
 - (c) Since 1997, HCVs for NED families have been also awarded under various special purpose HCV programs: Rental Assistance for Non-Elderly Persons with Disabilities in Support of Designated Housing Plans (Designated Housing), Rental Assistance for Non-Elderly Persons with Disabilities Related to Certain Types of Section 8 Project-Based Developments (Certain Developments), One-Year Mainstream Housing Opportunities for Persons with Disabilities, and the Project Access Pilot Program (formerly Access Housing 2000).
 - (a) **Designated Housing** vouchers enable non-elderly disabled families, who would have been eligible for a public housing unit if occupancy of the unit or entire project had not been restricted to elderly families only through an approved Designated Housing Plan, to receive rental assistance. These vouchers may also assist non-elderly disabled families living in a designated



unit/project/building to move from that project if they so choose. The family does not have to be listed on the PHA's voucher waiting list. Instead, they may be admitted to the program as a special admission. Once the impacted families have been served, the PHA may begin issuing these vouchers to non-elderly disabled families from their HCV waiting list. Upon turnover, these vouchers must be issued to non-elderly disabled families from the PHA's HCV waiting list.

- (b) **Certain Developments** vouchers enable non-elderly families having a person with disabilities, who do not currently receive housing assistance in certain developments where owners establish preferences for, or restrict occupancy to, elderly families, to obtain affordable housing. These non-elderly families with a disabled person do not need to be listed on the PHA's HCV waiting list in order to be offered and receive housing choice voucher rental assistance. It is sufficient that these families' names are on the waiting list for a covered development at the time their names are provided to the PHA by the owner. Once the impacted families have been served, the PHA may begin issuing these vouchers to non-elderly disabled families from their HCV waiting list. Upon turnover, these vouchers must be issued to non-elderly disabled families from the PHA's HCV waiting list.
- (c) **One-Year Mainstream Housing Opportunities for Persons with Disabilities (One-Year Mainstream)** vouchers enable non-elderly disabled families on the PHA's waiting list to receive a voucher. After initial leasing, turnover vouchers must be issued to non-elderly disabled families from the PHA's voucher waiting list.

19.9.B Eligible Population

- (1) **General Requirements [Notice PIH 2013-19]**
 - (a) Only eligible families whose head of household, spouse, or cohead is non-elderly (under age 62) and disabled may receive a NED voucher. Families with only a minor child with a disability are not eligible.
 - (b) In cases where the qualifying household member now qualifies as elderly due to the passage of time since the family received the NED voucher, existing NED participant families do not "age out," as the family was eligible on the day it was first assisted under a housing assistance payments (HAP) contract.



- (c) The definition of a person with disabilities for purposes of NED 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 and is provided in Exhibit 3-1 of this policy.
- (d) Opportunity Home may not implement eligibility screening criteria for NED vouchers that is different from that of the regular HCV program.

19.9.C Waiting List

(1) General Requirements [Notice PIH 2013-19]

- (a) Families must be selected for NED vouchers from Opportunity Home's waiting list in accordance with all applicable regulations and Opportunity Home policies in Chapter 4.
- (b) Regardless of the number of NED families Opportunity Home is required to serve, the next family on the waiting list must be served. Further, Opportunity Home may not skip over NED-eligible families on the waiting list because Opportunity Home is serving the required number of NED families.

(2) Reissuance of Turnover Vouchers [Notice PIH 2013-19]

- (a) All NED turnover vouchers must be reissued to the next NED family on the Opportunity Home's waiting list
- (b) All NED vouchers should be affirmatively marketed to a diverse population of NED-eligible families to attract protected classes least likely to apply. If at any time following the turnover of a NED HCV, Opportunity Home believes it is not practicable to assist NED families, Opportunity Home must contact HUD.

19.9.D Lease Up [Notice PIH 2013-19]

(1) Briefings

- (a) In addition to providing families with a disabled person a list of accessible units known to Opportunity Home, HUD encourages, but does not require Opportunity Home to provide additional resources to NED families as part of the briefing.

(2) Voucher Term



(a) While Opportunity Home is not required to establish different policies for the initial term of the voucher for NED vouchers, HUD has encouraged PHAs with NED vouchers to be generous in establishing reasonable initial search terms and subsequent extensions for families with a disabled person.

(ii) All NED vouchers will have an initial term of 120 calendar days.

(iii) The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless Opportunity Home grants an extension.

(iv) All other Opportunity Home policies on extensions and suspension of vouchers in Section 5.2.E. will apply.

(3) **Special Housing Types [Notice PIH 2013-19 and NED Category 2 FAQs]**

(a) In general, Opportunity Home is not required to permit families to use any of the special housing types and may limit the number of families using such housing. However, Opportunity Home must permit the use of a special housing type if doing so provides a reasonable accommodation so that the program is readily accessible to and usable by a person with disabilities.

(b) Such special housing types include single room occupancy housing, congregate housing, group homes, shared housing, cooperative housing, and manufactured homes when the family owns the home and leases the manufactured home space.

(c) Persons with disabilities transitioning out of institutional settings may choose housing in the community that is in a group or shared environment or where some additional assistance for daily living is provided for them on site. Under HUD regulations, group homes and shared housing are considered special housing types and are not excluded as an eligible housing type in the HCV program.

(d) Assisted living facilities are also considered eligible housing under the normal HCV program rules, as long as the costs for meals and other supportive services are not included in the housing assistance payments (HAP) made by Opportunity Home to the owner, and as long as the person does not need continual medical or nursing care.



19.9.E Portability [NED Category 2 FAQs]

- (1) NED voucher participants are eligible for portability under standard portability rules and all Opportunity Home policies regarding portability in Chapter 10 apply to NED families. However, Opportunity Home may, but is not required to, allow applicant NED families to move under portability, even if the family did not have legal residency in the initial PHA's jurisdiction when they applied.

Utility Reimbursements

Reason for the update to Section 6.3.A - Overview of Rent and Subsidy Calculations

This change may affect participants. Section 6.3.A(5)(e) will be updated to align with the proposed MTW activity "FY2027-X: Elimination of Negative Rent," which would eliminate utility reimbursements for non-elderly and non-disabled families as defined by HUD regulations. Implementation of this activity will occur at a later date once all necessary programming updates are complete.

6.3 Calculating Family Share and Opportunity Home Subsidy

6.3.A Overview of Rent and Subsidy Calculations

(5) Utility Reimbursement [24 CFR 982.514(b); 982.514(c)]

- (a) When the Opportunity Home subsidy for a family exceeds the rent to owner, the family is due a utility reimbursement. HUD permits Opportunity Home to pay the reimbursement to the family or directly to the utility provider.
 - (i) If Opportunity Home elects to pay the utility provider directly, Opportunity Home must notify the family of the amount paid to the utility provider.
- (b) Opportunity Home may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$45.00 or less. Reimbursements must be made once per calendar-year quarter and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. Opportunity Home must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship.



- (c) Opportunity Home will make utility reimbursements to elderly and disabled families as defined by HUD regulations, in accordance with "FY2027-X: Elimination of Negative Rent", to the family.
- (d) All utility reimbursement payments will be issued by direct deposit or prepaid debit card.
- (e) Per MTW Activity "FY2027-X: Elimination of Negative Rent," Opportunity Home will follow the guidelines below for TTP calculations that result in a negative number (utility reimbursements):
 - (i) **For Non-Elderly/Non-Disabled Households:** The TTP and UA will be calculated as usual. If the calculation results in a negative rent (utility reimbursement), the reimbursement will not be issued.
 - (ii) **For Elderly/Disabled Households:** These households will continue to receive UAP reimbursements if their utility allowance exceeds their TTP, in accordance with standard HUD guidelines.
- (f) Non-Elderly/Non-Disabled households may request a hardship exemption for utility reimbursements if one of the following criteria is met:
 - (i) The household is at imminent risk of utility shut-off for essential services (heat, water, electricity).
 - (ii) The household is at imminent risk of eviction due to an inability to cover the gap between the UA and actual costs during a period of zero income.
 - (iii) Loss of income that has lasted more than 30 days.
- (g) If the household is determined eligible, Opportunity Home may pay the utility reimbursement to the family directly.



Project-Based Voucher under the Rental Assistance Demonstration (RAD PBV Program)

Reason for the addition of Chapter 21 - Project-Based Voucher under the Rental Assistance Demonstration

Chapter 21 describes HUD regulations and Opportunity Home policies related to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program.

21.1 General Requirements

21.1.A Overview And History Of The RAD Program

- (1) The Rental Assistance Demonstration (RAD) program was authorized in 2012 in order to assess the effectiveness of converting public housing, moderate rehabilitation properties, and units under the rent supplement and rental assistance payments programs to long-term, project-based Section 8 rental assistance. The program's four primary objectives are to:
 - (a) Preserve and improve public and other assisted housing.
 - (b) Standardize the administration of the plethora of federally subsidized housing programs and rules. The conversions are intended to promote operating efficiency by using a Section 8 project-based assistance model that has proven successful and effective for over 30 years. In other words, RAD aligns eligible properties more closely with other affordable housing programs.
 - (c) Attract private market capital for property renovations. Through the use of this model, properties may be able to leverage private debt and equity to make capital repairs.
 - (d) Increase tenant mobility opportunities.
- (2) Under the first component, a PHA with public housing units may submit an application to HUD to convert some or all of their public housing units to long-term, project-based Section 8 HAP contracts under either:
 - (a) Project-based rental assistance (PBRA) under HUD's Office of Multifamily Housing Programs.
 - (b) Project-Based Vouchers (PBVs) under HUD's Office of Public and Indian Housing (PIH).



- (3) A RAD/Section 18 blend is a public housing conversion that combines RAD and Section 18 activities and that includes both converting public housing assistance to RAD PBV and converting tenant protection voucher (TPV) assistance to PBV in the same project.
- (4) All assistance converting under a RAD/Section 18 blend is placed under a single RAD HAP contract upon conversion, is subject to a single RAD Use Agreement, and is governed by the terms of Notice PIH 2019-23 (as amended by Supplemental Notice 4B and 4C).
- (5) This chapter will focus on public housing conversions to the PBV program under RAD as well as RAD/Section 18 blends. In order to distinguish between requirements for public housing conversion under RAD and PBV units under the standard PBV program, this chapter will refer to the standard PBV program and the RAD PBV program.

21.1.B Applicable Regulations

- (1) On the whole, the regulations for both the standard and RAD PBV programs generally follow the regulations for the tenant-based HCV program found at 24 CFR Part 982. However, important parts of the tenant-based regulations do not apply to the project-based program. 24 CFR Part 983 outlines the sections of 24 CFR Part 982 that are not applicable to the project-based program.
- (2) For the RAD PBV program, Congress authorized HUD to waive certain statutory and regulatory provisions or establish alternative requirements from the standard PBV program. Additionally, the RAD Statute imposes certain unique requirements and authorizes HUD to establish requirements for converted assistance under the Demonstration.
- (3) Conversions of public housing properties through RAD, including conversions through a RAD/Section 18 blend, will be subject to the requirements in Notice PIH 2019-23 (as amended by Supplemental Notice 4B and 4C), and as reflected in the RAD PBV HAP Contract.
- (4) Non-RAD PBV units in a project are also subject to the requirements of Notice PIH 2019-23 (as amended by Supplemental Notice 4B and 4C) in the following circumstances:
 - (a) Any legacy non-RAD PBV units located in the covered project are subject to the same waivers and alternative requirements where noted in Notice PIH 2019-23 (as amended by Supplemental Notice 4B and 4C) and in this policy.



- (b) Legacy non-RAD PBV units are defined as PBV assistance in a project that, prior to December 31, 2024, replaced public housing at the time of conversion and that are subject to a non-RAD PBV HAP contract.
- (c) When a PHA undertakes a RAD/Section 18 blend, all units are placed under a single RAD HAP contract upon conversion and are governed by the terms of Notice PIH 2019-23 (as amended by Supplemental Notice 4B and 4C).
- (5) Otherwise, all regulatory and statutory requirements for the standard PBV program in 24 CFR Part 983 and Section 8(o)(13) of the Housing Act of 1937, and all applicable standing and subsequent Office of Public and Indian Housing (PIH) notices and guidance, including related handbooks, apply to RAD PBV. This includes environmental review, Davis-Bacon, and fair housing requirements.
- (6) RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act of 2014 (Public Law 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act of 2015 (Public Law 113-235, approved December 6, 2014), the Consolidated Appropriations Act of 2016 (Public Law 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Public Law 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Public Law 115-141, approved March 23, 2018) collectively, the “RAD Statute.”
- (7) Requirements specific to the RAD program may be found in the following:
 - (a) Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing.
 - (b) For all conversion types, HUD reserves the right, in its sole discretion and upon request from the applicant, to apply provisions from previous versions of this notice to program participants that are near conversion.
 - (i) Notice PIH 2025-03 (Supplemental Notice 4C) amended Notice PIH 2019-23 (as amended by Notice 2023-19) and was effective January 16, 2025.



- (ii) Notice PIH 2023-19 (Supplemental Notice 4B) amended Notice PIH 2019-23 and Notice PIH 2021-07 and was effective July 27, 2023.
- (iii) Notice PIH 2019-23 was immediately applicable at the time of closing to all projects converting assistance (notwithstanding execution of a commitment for conversion). Notice PIH 2019-23 was published on September 5, 2019.
 - (A) Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which were effective after a 30-day comment period.
- (iv) Notice PIH 2012-32, REV-3 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published January 12, 2017.
 - (A) Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which were effective after a 30-day comment period.
- (v) Notice PIH 2012-32, REV-2 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published June 15, 2015.
 - (A) Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period.
- (c) RAD Quick Reference Guide for Public Housing Converting to PBV Assistance (2/22)
- (d) RAD Welcome Guide for New Awardees: RAD 1st Component (3/15)
- (e) Notice PIH 2016-17, Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.



- (i) This Notice applies to all projects that have applied for RAD conversion but have not yet converted as of November 10, 2016.
- (f) Notice PIH 2014-17, Relocation Requirements under the RAD Program, Public Housing in the First Component.
- (i) This notice may apply to projects that have converted to RAD prior to November 10, 2016, AND who have requested and received approval from HUD to be governed by this notice. See PIH Notice 2016-17, Section 1, Paragraph 1.3 for applicability.
- (g) RAD FAQs (<http://www.radresource.net/search.cfm>)
- (8) In other words, the standard PBV program follows many of the same regulations as the tenant-based HCV program, but not all of them, and the RAD PBV program follows many of the same regulations as the standard PBV program, but not all of them.
- (9) MTW agencies are able to apply activities impacting the PBV program that are approved in the MTW Plan to properties converting under RAD, provided they do not conflict with RAD requirements.

21.1.C Tenant-Based vs. Project-Based Voucher Assistance [24 CFR 983.2]

- (1) Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the Opportunity Home policies related to tenant-based assistance also apply to RAD PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

(a) Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the Opportunity Home policies for the tenant-based voucher program contained in this administrative plan also apply to the RAD PBV program and its participants. This chapter is intended to address requirements specific to the RAD PBV program only.

21.1.D Relocation Requirements

- (1) For projects that apply for conversion of assistance under the First Component of RAD and will convert November 10, 2016, or later, the following applies [Notice PIH 2016-17]:



- (a) In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when assistance is transferred from one site to another. RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion.
- (b) Residents who are temporarily relocated retain the right to return to the project once it has been completed. Any legacy non-RAD PBV units located in the same project are also subject to the right to return.
- (c) Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act (URA) requirements, and other requirements that may be applicable such as Section 104(d) of the Housing and Community Development Act of 1974, as amended. Sample informing notices are provided in Appendices 2-5 of Notice PIH 2014-17.
- (d) A written relocation plan is required if the RAD conversion involves permanent relocation (including a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than a year. While Opportunity Home is not required to have a written relocation plan for temporary relocation lasting one year or less, HUD strongly encourages Opportunity Home to prepare one. Appendix II of Notice PIH 2016-17 contains recommended contents for a relocation plan.
- (e) In addition, PHAs must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24. The obligations due to relocating residents under RAD are broader than URA relocation assistance and payments.
- (f) Any residents who may need to be temporarily relocated to facilitate rehabilitation or construction will have the right to return to either:
 - (i) a unit at the development once rehabilitation or construction is completed, provided the resident's household is not under-housed; or



- (ii) a unit in the development which provides the same major features as the resident's unit in the development prior to the implementation of the RAD conversion.
- (g) Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.
- (h) If Opportunity Home's proposed plans for conversion would preclude a resident from returning to the development, the resident must be given an opportunity to comment and/or object to such plans. Opportunity Home must alter the project plans to accommodate the resident's right to return to the development if the resident would be precluded from returning to the development.
- (i) Examples of project plans that may preclude a resident from returning to the development include, but are not limited to:
 - (i) Changes in the development's bedroom distribution that decrease the size of the units, resulting in the resident being under-housed;
 - (ii) The resident cannot be accommodated in the remaining assisted units due to a reduction in the number of assisted units at the development;
 - (iii) Income limit eligibility requirements associated with the LIHTC program or another program; and
 - (iv) Failure to provide a reasonable accommodation, in violation of applicable law, where reasonable accommodation may include installation of accessibility features that are needed by the resident.
- (j) Residents of a development undergoing conversion that would be precluded from returning to the development may voluntarily accept Opportunity Home's or owner's offer to permanently relocate to alternative housing, and thereby waive their right to return to the development after rehabilitation or construction is completed. In this event, Opportunity Home must secure the resident's written consent to a voluntary permanent relocation in lieu of returning to the development.
- (k) Opportunity Home is prohibited from employing any tactics to pressure residents into relinquishing their right to return or accepting other housing options. Additionally, Opportunity Home



may not terminate a resident's lease if Opportunity Home fails to obtain the resident's consent and the resident seeks to exercise the right to return.

- (l) In the case of multi-phase RAD transactions, the resident has a right to return to the development or to other converted phases of the development that are available for occupancy at the time the resident is eligible to exercise their right of return. Generally, the resident's right to return must be accommodated within the development associated with the resident's original unit; however, Opportunity Home may treat multiple converted developments on the same site as one for purposes of right to return. Should Opportunity Home seek to have the resident exercise the right to return at a future phase, Opportunity Home must secure the resident's consent in writing.
- (m) Alternative housing options may involve a variety of housing options, including but not limited to:
 - (i) Transfers to Public Housing
 - (ii) Admission to other affordable housing properties subject to the applicable program rules
 - (iii) Housing Choice Voucher (HCV) assistance
 - (iv) Homeownership programs subject to the applicable program rules
 - (v) Other options identified by Opportunity Home
- (2) However, for projects that applied for conversion prior to November 10, 2016, the following applies [Notice PIH 2014-17]:
 - (a) In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when assistance is transferred from one site to another.
 - (b) RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion. Residents who are temporarily relocated retain the right to return to the project once it has been completed.
 - (c) Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act



(URA) requirements. Sample informing notices are provided in Appendices 2-5 of Notice PIH 2014-17.

- (d) While Opportunity Home is not required to have a written relocation plan, HUD strongly encourages Opportunity Home to prepare one. Appendix I of Notice PIH 2014-17 contains recommended contents for a relocation plan.
- (e) In addition, Opportunity Home must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24.
- (f) Any residents who may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.
- (g) Residents of a development undergoing conversion of assistance may voluntarily accept Opportunity Home's or the owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.
- (h) For RAD/Section 18 blends, all RAD relocation requirements (such as the resident notice and meeting requirements, the right to return, and relocation assistance and payments) as described in Notice PIH 2016-17 or successor notices apply to residents of the units subject to a Section 18 action in lieu of the relocation requirements under 24 CFR 970.21. Opportunity Home must provide the same relocation rights and benefits to all residents of the converting project [Notice PIH 2025-03].

21.1.E Equal Opportunity Requirements [24 CFR 983.8; 24 CFR 5.105; Notice PIH 2016-17]

- (1) RAD conversions are governed by the same civil rights authorities that govern HUD-assisted activities in general. These authorities prohibit discrimination and impose affirmative obligations on HUD program participants.



(2) Opportunity Home must comply with all applicable fair housing and civil rights laws, including but not limited to the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. For example, persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their need for an accessible unit must be accommodated. See the RAD Fair Housing, Civil Rights, and Relocation Notice [Notice PIH 2016-17] for more information.



21.2 PBV Project Selection

21.2.A Overview

- (1) Unlike in the standard PBV program, where the PHA typically selects the property through an owner proposal selection process, projects selected for assistance under RAD PBV are selected in accordance with the provisions in Notice PIH 2019-23. Therefore, 24 CFR 983.51 does not apply since HUD selects RAD properties through a competitive selection process.

21.2.B Ownership and Control [Notice PIH 2019-23]

- (1) For projects governed by Notice PIH 2019-23, the following language applies:
- (a) Under the PBV program, the contract administrator and the owner listed on the contract cannot be the same legal entity (i.e., the PHA cannot execute a contract with itself). To avoid this situation, Opportunity Home may either:
 - (i) Transfer the ownership of the project to a nonprofit affiliate or instrumentality of the PHA (including to a “single-purpose entity” that owns nothing other than the property, which will typically be a requirement of a lender or investor), or
 - (ii) Opportunity Home can form a related entity that is responsible for management and leasing and can serve as the owner for purposes of the Section 8 HAP contract; in this scenario, the HAP is then executed between Opportunity Home (as the contract administrator) and Opportunity Home’s related entity (as the owner for HAP contract purposes). Note that in the second scenario, both Opportunity Home and the entity serving as the owner for HAP contract purposes will be required to sign the RAD Use Agreement [RAD Resource Desk FAQ 01/24/19].
 - (b) Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or nonprofit entity.
 - (c) HUD may also allow ownership of the project to be transferred to a tax credit entity controlled by a for-profit entity to facilitate the use of tax credits for the project, but only if HUD determines that



the PHA or a nonprofit entity preserves an interest in the profit. The requirement for a public or nonprofit entity, or preservation of an interest by a PHA or nonprofit in a property owned by a tax credit entity controlled by a for-profit entity, is satisfied if a public or nonprofit entity (or entities), directly or through a wholly owned affiliate:

- (i) Holds a fee simple interest in the property;
- (ii) Is the lessor under a ground lease with the property owner;
- (iii) Has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units,
- (iv) Owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable;
- (v) Owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD;
- (vi) Owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or
- (vii) Demonstrates other ownership and control arrangements approved by HUD.

(d) Control may be established through the terms of the project owner's governing documents or through a Control Agreement, provided that in either case amendment of the terms of control requires consent from HUD.

(2) For projects subject to the requirements of Notice PIH 2012-32, REV-3, the following language applies:

- (a) Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or nonprofit entity. The requirement for a public or nonprofit entity is satisfied if a public or nonprofit entity (or entities), directly or through a wholly owned affiliate:
 - (i) Holds a fee simple interest in the property;
 - (ii) Is the lessor under a ground lease with the property owner;



- (iii) Has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units.
- (iv) Owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable;
- (v) Owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD;
- (vi) Owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or
- (vii) Demonstrates other ownership and control arrangements approved by HUD.
- (b) If low-income housing tax credits will be used, HUD may allow ownership of the property to be transferred to a tax credit entity controlled by a for-profit entity if HUD determines that Opportunity Home preserves its interest in the property. Preservation of Opportunity Home interest in the property includes, but is not limited to, the following:
 - (i) Opportunity Home, or an affiliate under its sole control, is the general partner or managing member;
 - (ii) Opportunity Home retains fee ownership and leases the real estate to the tax credit entity pursuant to a long-term ground lease;
 - (iii) Opportunity Home retains control over leasing the property and determining program eligibility;
 - (iv) Opportunity Home enters into a control agreement by which Opportunity Home retains consent rights over certain acts of the project owner and retains certain rights over the project;
 - (v) Other means that HUD finds acceptable
- (3) For projects that converted assistance prior to the implementation of Notice PIH 2012-32, REV3, the following language applies:
 - (a) During both the initial term and renewal terms of the HAP contract, ownership must be either of the following:



- (i) A public or nonprofit entity that has legal title to the property. The entity must have the legal authority to direct the financial, legal, beneficial, and other interests of the property; or
- (ii) A private entity, if the property has low-income tax credits. Opportunity Home must maintain control via a ground lease.

21.2.C PHA-Owned Units [24 CFR 983.57, FR Notice 1/18/17, and Notice PIH 201721]

- (1) If the project is Opportunity Home-owned, rent-setting (including redetermination of rent and determination of rent reasonableness) and inspection functions described in 24 CFR 983.57 must be conducted by an independent entity approved by HUD.
- (2) The definition of ownership or control provided under Notice PIH 2019-23 (listed above) is used specifically to determine whether a PHA retains control over a project for purposes of HUD's requirement for ownership or control of the covered project under RAD.
- (3) For purposes of determining whether an independent entity will perform certain functions for the project, the definition of PHA-owned under 24 CFR 982.4 is used. This is the same definition used for standard PBV units. In some cases, a project may meet the RAD definition of ownership or control but may not be considered PHA-owned for purposes of requiring an independent entity.
- (4) The independent entity that performs the program services may be the unit of general local government for Opportunity Home jurisdiction (unless Opportunity Home is itself the unit of general local government or an agency of such government), or another HUD-approved public or private independent entity.
- (5) Opportunity Home may compensate the independent entity from Opportunity Home's ongoing administrative fee income (including amounts credited to the administrative fee reserve). Opportunity Home may not use other program receipts to compensate the independent entity for its services. Opportunity Home and the independent entity may not charge the family any fee for the services provided by the independent entity.



- (a) If units converted to PBV under RAD are Opportunity Home-owned housing. Opportunity Home will use [insert name of the entity] as the HUD-approved independent entity.

21.2.D Subsidy Layering Requirements [Notice PIH 2019-23; Notice PIH 201232, REV-3; Notice PIH 2012-32, REV-2]

- (1) For projects governed by Notice PIH 2019-23, REV-4, the following language applies:

- (a) In the case of a PHA that will no longer have ACC units as a result of the pending or simultaneous closing or have less than 50 units remaining and have initiated procedures to dispose of their final ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project or projects through the conversion. However, the PHA must estimate and plan for outstanding liabilities and costs and must follow Notice PIH 2016-23 or successor notice regarding the administrative activities required to terminate the ACC if it has no plans to develop additional public housing.
- (b) In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13.
- (c) Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of their RAD properties may impact the physical and financial health of properties that will remain in their public housing inventory.
- (d) Following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless those funds have been identified in the RCC and converted at closing for Section 8 RAD purposes.



(2) For projects governed by Notice PIH 2012-32, REV-3, the following language applies:

- (a) In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered projects. In order to cover the cost of administrative activities required to terminate the ACC, once it no longer has units under the ACC and has no plans to develop additional public housing, the PHA may:
 - (i) Designate that a reserve associated with the project be available to fund any public housing closeout costs (such as an operating deficit reserve or a specific PHA closeout reserve). Any funds not needed for public housing closeout costs would remain in such reserve or may be transferred to another reserve associated with the project (such as the replacement reserve). Thereafter, these funds may be used at the project pursuant to the authorized use of the applicable reserve; or
 - (ii) Retain funds under the public housing program for this purpose. However, HUD will recapture any public housing funds that a PHA does not expend for closeout costs.
- (b) In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13.
- (c) Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in their public housing inventory.
- (d) In addition, following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project



unless such funding has been identified in the approved financing plan and included in the approved “sources and uses” attached to the RCC.

(3) For projects governed by the requirements of Notice PIH 2012-32, REV-2, the following language applies:

(b) In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered project. HUD will recapture any public housing funds that a PHA has not expended once it no longer has units under ACC.

(b) In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13.

(c) Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of their RAD properties may impact the physical and financial health of properties that will remain in their public housing inventory.

21.2.E PBV Percentage Limitation and Unit Cap [Notice PIH 2025-03, Supplemental Notice 4C]

(1) PBV Percentage Limitation

(a) RAD PBV units in covered projects do not count against the maximum amount of assistance Opportunity Home may utilize for the PBV program (program cap), which under the standard PBV program is set at 20 percent of the authorized units allocated to Opportunity Home under the HCV program with the ability to project-base an additional 10 percent of units that meet certain requirements.

(b) The number of PBV units excluded from Opportunity Home’s PBV program cap cannot exceed the number of former public



housing units that those PBV units are replacing through the course of the RAD conversion.

(c) All PBV units in a covered project that replace former public housing units at the time of conversion are excluded from both the numerator and the denominator when calculating the percent of vouchers that may be project-based by a PHA. To implement this provision, HUD is waiving section 8(o)(13)(B) of the 1937 Act as well as 24 CFR 983.6.

(2) Cap on the Number of PBV Units in Each Project [Notice PIH 2025-03, Supplemental Notice 4C]

(a) There is no cap on the number of units that may receive RAD PBV assistance in each project. Under 24 CFR 983.54(c)(3), units excluded under 24 CFR 983.59 that were previously subject to federally required rent restrictions or received one of the listed forms of HUD assistance do not count toward the project cap.

(b) For any RAD PBV and legacy Non-RAD PBV units in projects not already excluded under 24 CFR 983.59, including transfers of assistance to a new location, HUD waived section 8(o)(13)(D) of the Act, as well as related provisions of 24 CFR 983.54. Accordingly, units under a RAD PBV HAP contract may not be “excepted” for a specified purpose.

21.2.F Site Selection Standards [Notice PIH 2019-23; Notice PIH 201617]

(1) Site selection requirements set forth in 24 CFR 983.55 apply to RAD PBV, with the exception of the provisions regarding deconcentration of poverty and expanding housing and economic opportunity for existing housing sites.

(2) To facilitate the uniform treatment of residents and units, any legacy non-RAD PBV units located in the same project are subject to the terms of this provision.

(3) HUD will conduct a front-end civil rights review of the PHA's proposed site in certain circumstances. For RAD PBV conversions that involve new construction located in an area of minority concentration (whether on the existing public housing site or on a new site), HUD will determine whether it meets one of the exceptions that would allow for new construction in an area of minority concentration.



- (4) The PHA must ensure that its RAD PBV conversion, including any associated new construction, is consistent with its certification to affirmatively further fair housing and complies with civil rights laws.

21.2.G Environmental Review [Notice PIH 2019-23; Environmental Review Requirements for RAD Conversions, March 2019]

- (1) HUD cannot approve an applicant's financing plan submission unless and until the required environmental review has been completed for the applicant's proposed conversion project and found to meet environmental review requirements.
- (2) Environmental documents must be submitted no later than the applicant's financing plan. HUD will not issue a RAD Conversion Commitment (RCC) if the project plan does not meet the environmental review requirements described in Attachment 1A of Notice PIH 2019-23.
- (3) Once an awardee has submitted an application for a specific project, they may not make any choice-limiting actions before the completion of the environmental review.



21.3 Dwelling Units

21.3.A Overview

This part identifies the special housing quality standards that apply to the RAD PBV program, housing accessibility for persons with disabilities, and special procedures for NSPIRE inspections.

21.3.B Housing Quality Standards [24 CFR 983.101 and 24 CFR 5.703]

- (1) Housing quality standards for the tenant-based program generally apply to the PBV program. Housing quality standards requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.
- (2) **Lead-Based Paint [24 CFR 983.101(c); Notice PIH 2019-23]**
 - (a) The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, the Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, and R, and 40 CFR 745.227, apply to the PBV program.

21.3.C Housing Accessibility for Persons with Disabilities [Notice PIH 2016-17]

- (1) Federal accessibility requirements apply to all conversions, whether they entail new construction, alterations, or existing facilities. The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.
- (2) Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)



21.3.D Inspecting Units [24 CFR 983.103]

(1) Initial Inspection [RAD Quick Reference Guide, Notice PIH 2019-23, and Notice PIH 202319]

- (a) Under standard PBV regulations at 24 CFR 983.103(c), Opportunity Home must inspect and determine that all of the proposed PBV units fully comply with housing quality standards before entering the HAP contract, unless Opportunity Home has adopted a policy to enter into a HAP contract for units that fail the initial inspection as a result of only non-life-threatening conditions (NLT option), or if the unit passed an alternative inspection, or both.
- (b) It is the responsibility of the contract administrator to perform this initial inspection (unless units are Opportunity Home-owned). In order to accommodate projects in which repairs are conducted, however, HUD has waived this requirement when units are undergoing rehabilitation. In this case, units must meet housing quality standards by the date indicated in the RAD Conversion Commitment (RCC).
- (c) To place the unit under HAP contract and commence making payments, Opportunity Home may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units to be added to the HAP contract instead of conducting an initial inspection.
- (d) During the period of the work, housing quality standards requirements apply. Opportunity Home must enforce the project owner's obligations and conduct inspections when needed, (for example in response to tenant complaints or other information coming to its attention), and the owner must correct any deficiencies in accordance with NSPIRE requirements (i.e., no more than 24 hours for a life-threatening deficiency, and within no more than 30 calendar days or any PHA-approved extension for other defects, but no later than the date of the completion of the work as indicated in the RCC).

(2) Turnover Inspections [24 CFR 983.103(d), FR Notice 1/18/17, and Notice PIH 2017-20]

- (a) Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. Opportunity Home may not provide assistance on behalf of the family until the unit fully complies with housing quality standards.



(3) Periodic Inspections [24 CFR 983.103(e); FR Notice 6/25/14]

(a) At least once every 24 months (or once every 36 months for small rural PHAs) during the term of the HAP contract, Opportunity Home must inspect a random sample consisting of at least 20 percent of the contract units in each building, to determine if the contract units and the premises are maintained in accordance with housing quality standards. Turnover inspections are not counted toward meeting this inspection requirement.

(i) Opportunity Home will inspect a random sample of at least 20 percent of the contract units in each building biannually to determine whether the contract units and the premises are maintained in accordance with applicable housing quality standards.

(b) If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, Opportunity Home must reinspect 100 percent of the contract units in the building.

(4) Alternative Inspections [24 CFR 983.103(i); Notice PIH 2016-05]

In the case of a PBV project financed under a federal, state, or local housing program that is subject to alternative inspections, Opportunity Home may rely upon an alternative inspection conducted at least triennially to demonstrate compliance with inspection requirements.

(a) Opportunity Home will accept the results of inspections performed by HUD REAC, or for the HOME or LIHTC programs. Inspections will only be accepted if PBV and HCV units are included in the population of units forming the basis of the sample.

(b) Opportunity Home will not utilize inspection results other than from inspections conducted by HUD or for the HOME or LIHTC programs.

(c) Inspection reports and other data must be provided to Opportunity Home within five business days of the inspection. Opportunity Home will review the inspection reports and determine whether the unit will receive a “pass” within five business days.

(d) If Opportunity Home determines that the unit does not pass, Opportunity Home will notify the owner and conduct an inspection within 10 business days.

(5) Interim Inspections [24 CFR 983.103(f)]



(a) If a participant or government official notifies Opportunity Home of a potential deficiency, the following applies:

(i) If the reported deficiency is life-threatening, Opportunity Home must, within 24 hours of notification, both inspect the housing unit and notify the owner if the life-threatening deficiency is confirmed. The owner must then make the repairs within 24 hours of Opportunity Home's notification.

(ii) If the reported deficiency is non-life-threatening, Opportunity Home must, within 15 days of notification, both inspect the unit and notify the owner if the deficiency is confirmed. The owner must then make the repairs within 30 days of notification from Opportunity Home or within any Opportunity Home-approved extension.

(iii) During an interim inspection, Opportunity Home generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs.

(iv) If the periodic inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled, Opportunity Home may elect to conduct a full inspection.

(6) Follow Up Inspections [24 CFR 983.103(f)(2)]

(a) Opportunity Home must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected a housing quality standards violation and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of housing quality standards.

(7) Supervisory Quality Control Inspections [24 CFR 983.103(f)(3)]

(a) In conducting Opportunity Home supervisory quality control inspections, Opportunity Home should include a representative sample of both tenant-based and project-based units.

(8) Inspecting Opportunity Home-Owned Units [24 CFR 983.103(g); Notice PIH 2017-21]

(a) In the case of Opportunity Home-owned units, all required inspections must be performed by an independent entity designated by Opportunity Home and approved by HUD. The



independent entity must furnish a copy of each inspection report to Opportunity Home. Opportunity Home must take all necessary actions in response to inspection reports from the independent agency, including the exercise of contractual remedies for violation of the HAP contract by the PHA-owner.

(b) As authorized by MTW Activity FY2013-4, Opportunity Home will perform HQS inspections of all Opportunity Home-owned units. An Opportunity Home-owned unit is defined as a unit that is owned by Opportunity Home and/or an affiliate of Opportunity Home that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by Opportunity Home).



21.4 Housing Assistance Payments (HAP) Contract

21.4.A Overview [RAD PBV Quick Reference Guide 6/20]

- (1) Public housing projects converting under RAD do not employ the PBV Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Instead, following the execution of all requirements contained in the Commitment to Enter into a HAP (CHAP) contract and the RAD Conversion Commitment (RCC), a project is converted immediately to the RAD PBV HAP contract following the closing of any construction financing.
- (2) Except for transfers of assistance, the RAD PBV HAP contract takes effect before any work begins. Owners of public housing projects converted to PBV assistance via RAD enter into a HAP contract with the PHA that will administer the PBV assistance. Units assisted under a RAD PBV HAP contract must be subject to long-term, renewable use and affordability restrictions.

21.4.B HAP Contract Requirements

- (1) **Contract Information [RAD PBV Quick Reference Guide 6/20; Notice PIH 2019-23]**
 - (a) The RAD PBV program uses the PBV HAP contract for new construction or rehabilitated housing (Form HUD-52530A), as modified by the RAD rider (Form HUD-52621). For closings on or after January 1, 2018, HUD incorporated the RAD rider directly into the standard PBV HAP contract. For closing that occurred prior to January 1, 2018, the RAD rider must be attached to the PBV HAP contract.
 - (b) The distinction between “existing housing” and “rehabilitated and newly constructed housing” is overridden by RAD requirements. The project must also have an initial RAD use agreement. All public housing RAD conversion properties financed with LIHTC are also required to include an LIHTC rider.
- (2) **Execution and Effective date of the HAP Contract [RADBlast! 7/11/16]**
 - (a) RAD PBV projects do not employ an Agreement to Enter into a Housing Assistance Payments (AHAP) contract like in the standard PBV program. Rather, when the conditions of the CHAP and the RCC are met, and the conversion has closed, Opportunity Home executes the HAP contract. Project owners



may select the effective date of the HAP contract as the first day of either of the two months following the completed closing.

(4) Term of HAP Contract [Notice PIH 2019-23]

- (a) The initial term of the HAP contract may not be for less than 15 years and may be for a term of up to 20 years upon request of the owner and with approval of the administering voucher agency.
- (b) Upon expiration of the initial term of the contract, and upon each renewal term of the contract, the owner must accept each offer to renew the contract, for the prescribed number and mix of units, either on the site of the project subject to the expiring contract or, upon request of the project owner and subject to Opportunity Home and HUD approval, at another site through a future transfer of assistance.
- (c) Contracts are subject to the terms and conditions applicable at the time of each offer and further subject to the availability of appropriations for each year of each such renewal. To implement this provision, HUD is waiving section 8(o)(13)(F) of The United States Housing Act of 1937, which permits a minimum term of one year, as well as 24 CFR 983.205(a), which governs the contract term.
- (d) After the expiration of a 20-year initial term of the HAP contract, the HAP contract must be renewed on a form approved by HUD, which must include language that requires rents to be re-determined in accordance with 24 CFR 983.301 and 983.302. If the RAD PBV HAP contract was renewed or extended prior to the 20th year after conversion, then starting with the 20th year after execution of the original RAD PBV HAP contract, contract rents shall be redetermined in accordance with 24 CFR 983.302 or successor regulation [Notice PIH 2025-03].

(5) Agreement to Enter into a HAP (AHAP) Contract [Notice PIH 2019-23]

- (a) For public housing conversions to PBV, there will be no agreement to enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D, are waived. The definitions for proposal selection date, new construction, rehabilitation, and existing housing are not applicable.



(6) Mandatory Contract Renewal [Notice PIH 2019-23]

- (a) By statute, upon contract expiration, the agency administering the vouchers will offer, and Opportunity Home will accept, renewal of the contract for the prescribed number and mix of units, either on the site of the project subject to the expiring contract or, upon request of the project owner and subject to Opportunity Home and HUD approval, at another site through a future transfer of assistance. The contract is subject to the terms and conditions applicable at the time of renewal and the availability of appropriations each year for such renewal. Consequently, 24 CFR 983.205(b), governing Opportunity Home's discretion to renew the contract, will not apply.
- (b) In the event that the HAP contract is removed due to breach, non-compliance or insufficiency of appropriations, for all units previously covered under the HAP contract, new tenants must have incomes at or below 80 percent of the area median income at the time of admission and rents may not exceed 30 percent of 80 percent of median income for an appropriate size unit for the remainder of the term of the RAD use agreement.

(7) Remedies for Housing Quality Standards Deficiencies [24 CFR 983.208]

- (a) The following is applicable to HAP contracts executed or renewed before June 6, 2024.
 - (i) Opportunity Home may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with housing quality standards. If Opportunity Home determines that a contract unit does not comply with housing quality standards, Opportunity Home may exercise any of its remedies under the HAP contract for any or all of the contract units.
 - (ii) Available remedies include termination of housing assistance payments, abatement or withholding of housing assistance payments, reduction of contract units, and termination of the HAP contract.
 - (iii) Opportunity Home will abate contracts for noncompliance with housing quality standards in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8.2.G., Enforcing Owner Compliance.



The following is applicable to HAP contracts executed or renewed June 6, 2024, or later.

(8) Enforcement of Housing Quality Standards [24 CFR 983.208(b)]

(i) Opportunity Home must vigorously enforce the owner's obligation to maintain contract units in accordance with housing quality standards. If the owner fails to maintain the dwelling unit in accordance with housing quality standards, Opportunity Home must take enforcement action. The unit is in noncompliance with housing quality standards if:

(A) Opportunity Home or another inspector authorized by the state or local government determines the unit has housing quality standards deficiencies based upon an inspection;

(B) The agency or inspector notifies the owner in writing of the unit housing quality standards deficiencies; and

(C) The deficiencies are not remedied within the following timeframes:

(1) For life-threatening deficiencies, the owner must correct the deficiency within 24 hours of notification;

(2) For other deficiencies, the owner must correct the deficiency within 30 calendar days of notification (or any reasonable Opportunity Home-approved extension).

(ii) In the case of an HQS deficiency that Opportunity Home determines is caused by the tenant, any member of the household, or any guest or other person under the tenant's control, other than any damage resulting from ordinary use, Opportunity Home may waive the owner's responsibility to remedy the violation. Housing assistance payments to the owner may not be withheld or abated if the owner's responsibility has been waived. However, Opportunity Home may terminate assistance to a family because of a housing quality standards breach beyond damage resulting from ordinary use caused by any member of the household or any guest or other person under the tenant's control, which may result in removing the unit from the HAP contract.



(iii) Opportunity Home will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected; the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

(iv) In the case of a housing quality standards deficiency that is caused by fire, natural disaster, or similar extraordinary circumstances, Opportunity Home may permit the owner to undertake substantial improvement in accordance with 24 CFR 983.212. However, so long as the contract unit with deficiencies is occupied, Opportunity Home must withhold or abate housing assistance payments and remove units from or terminate the HAP contract as described in this section.

(v) In the case of a project that is undergoing development activity after HAP contract execution, the remedies of 24 CFR 983.208(d) do not apply to units designated as unavailable for occupancy during the period of development activity in accordance with the rider. However, in the case of any contract unit with deficiencies that is occupied, Opportunity Home must withhold or abate housing assistance payments and remove units from or terminate the HAP contract as described in this section.

(9) Family Obligation [24 CFR 983.208(c)]

(a) The family may be held responsible for a breach of housing quality standards caused by any of the following:

- (i) Tenant-paid utilities not in service;
- (ii) Failure to provide or maintain appliances owned by the family; and
- (iii) Damage to the dwelling unit or premises caused by a household member or guest beyond ordinary wear and tear.



(A) Damages beyond ordinary wear and tear will be considered to be damages that could be assessed against the security deposit under state law or in court practice.

(b) If Opportunity Home has waived the owner's responsibility to remedy the violation, the following applies:

(i) If the housing quality standards breach caused by the family is life-threatening, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 24 hours of notification.

(ii) For other family-caused deficiencies, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 30 calendar days of notification (or any PHA-approved extension).

(c) If the family has caused a breach of the HQS, Opportunity Home must take prompt and vigorous action to enforce the family obligations. Opportunity Home may terminate assistance for the family in accordance with 24 CFR 982.552.

(10) Opportunity Home Remedies [24 CFR 983.208(d)]

(a) The remedies listed below apply when housing quality standards deficiencies are identified as the result of an inspection other than a pre-selection, initial, or turnover inspection. Opportunity Home must identify in its administrative plan the conditions under which it will withhold HAP and the conditions under which it will abate HAP or terminate the HAP contract for units other than the unit with housing quality standards deficiencies.

(i) The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, Opportunity Home will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

(ii) Opportunity Home will not withhold assistance payments upon notification to the owner of the deficiencies.

(iii) When life-threatening conditions are identified, Opportunity Home will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the



violation. The corrective actions must be taken within 24 hours of Opportunity Home's notice.

- (iv) When failures that are not life-threatening are identified, Opportunity Home will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.
- (v) If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any Opportunity Home-approved extension), the owner's HAP will be abated.
- (vi) Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any Opportunity Home-approved extension, if applicable) the family's assistance will be terminated in accordance with Opportunity Home policy (see Chapter 12).

(11) HAP Withholding [24 CFR 983.208(d)(1)]

- (a) Opportunity Home may withhold assistance payments for units that have housing quality standards deficiencies once Opportunity Home has notified the owner in writing of the deficiencies. Opportunity Home's administrative plan must identify the conditions under which Opportunity Home will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, Opportunity Home resumes assistance payments and provides assistance payments to cover the time period for which the payments were withheld.

- (i) Opportunity Home will not withhold assistance payments upon notification to the owner of the deficiencies.

(12) HAP Abatement [24 CFR 983.208(d)(2)]

- (a) Opportunity Home must abate the HAP, including amounts that had been withheld, if the owner fails to make the repairs within the applicable cure period. Opportunity Home may choose to



abate payments for all units covered by the HAP contract due to a contract unit's noncompliance with the housing quality standards, even if some of the contract units continue to meet housing quality standards.

(b) In this case, Opportunity Home must notify the family and the owner that it is abating payments and, if the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by Opportunity Home), Opportunity Home will either terminate the HAP contract or remove the unit with deficiencies from the HAP contract, and any family residing in a unit that does not comply with housing quality standards will have to move if the family wishes to receive continued assistance.

(c) The owner may not terminate the tenancy of any family due to the withholding or abatement of assistance.

(i) Opportunity Home will make all HAP abatements effective the first of the month following the expiration of the Opportunity Home-specified correction period (including any extension).

(ii) Opportunity Home will abate payments only for those contract units that do not meet housing quality standards.

(iii) Opportunity Home will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

(d) During any abatement period, the family continues to be responsible for its share of the rent.

(13) Failure to Make Repairs

(a) If an owner fails to make required repairs within 60 days (or a reasonable longer period established by Opportunity Home) of the notice of abatement, Opportunity Home must either remove the unit from the HAP contract or terminate the HAP contract in its entirety.

(b) Opportunity Home must issue the family whose unit will be removed or all families residing in contract units, if Opportunity Home is terminating the HAP contract, a tenant-based voucher to move at least 30 days prior to the removal of the unit from the HAP contract or termination of the HAP contract.



(c) A family may elect to remain in the project if the project contains a unit that meets the requirements of that section, with priority given to families who will remain in the same unit if there are insufficient units available to accommodate all families that wish to remain.

(d) Opportunity Home must give any family residing in a unit that is either removed from the HAP contract or for which the HAP contract is terminated due to a failure to correct housing quality standards deficiencies at least 90 days or a longer period as Opportunity Home determines is reasonably necessary following the termination of the HAP contract or removal of the unit from the HAP contract to lease a unit with tenant-based assistance.

(i) Opportunity Home will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days. No briefing is required for these families.

(ii) In order to receive tenant-based assistance under the HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 120-day period, unless Opportunity Home grants an extension.

(iii) Opportunity Home will follow the policies set forth in Chapter 5 on voucher extension and expiration.

(13) Offer of Public Housing [24 CFR 983.208(d)(6)(ii)]

(a) If the family is unable to lease a new unit within the term of the voucher, and Opportunity Home owns or operates public housing, Opportunity Home must offer, and, if accepted, provide the family a selection preference for an appropriately sized public housing unit that first becomes available for occupancy after the time period expires.

(i) Opportunity Home does operate a public housing program and will provide a preference for PBV families whose units is being removed from the HAP contract or whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.



(ii) Thirty days prior to the expiration date of the voucher, Opportunity Home will provide written notice to the family stating that Opportunity Home does provide such a preference.

(14) Relocation Assistance [24 CFR 983.208(d)(6)(iii)]

(a) Opportunity Home may assist families relocating due to the HAP contract being terminated as a result of the owner failing to make required repairs within the required time frame in finding a new unit, including using up to two months of the withheld and abated assistance payments for costs directly associated with relocating to a new unit, including security deposits, temporary housing costs, or other reasonable moving costs as determined by Opportunity Home based on their locality.

(b) If Opportunity Home uses withheld and abated payments to assist with relocation costs, Opportunity Home must provide security deposit assistance to the family as necessary. Opportunity Home must assist families with disabilities with locating available accessible units in accordance with 24 CFR 8.28(a)(3). If the family receives security deposit assistance from Opportunity Home for the new unit, Opportunity Home may require the family to remit the security deposit returned by the owner of the new unit at such time that the lease is terminated, up to the amount of security deposit provided by Opportunity Home for that unit.

(i) Opportunity Home will assist families with disabilities with locating available accessible units in accordance with program requirements.

21.4.C Amendments to the HAP Contract

(1) Floating Units [Notice PIH 2019-23]

(a) Upon request of the owner to the voucher agency that will administer the project, HUD will permit assistance to float among units within the project that are the same bedroom size. The unit to which assistance is floated must be comparable to the unit being replaced in quality and amenities.

(b) If Opportunity Home chooses to float units, units are not specifically identified on the HAP contract; rather, the HAP contract must specify the number and type of units in the



property that are RAD PBV units. The property must maintain the same number and type of RAD units from the time of the initial HAP contract execution forward.

- (c) Opportunity Home will allow the floating of assistance among unoccupied units within the project on a case-by-case basis.
- (d) Tracking of the number and type of units at the property, as well as identification of comparable units when assistance is floated, will be maintained by each property.

(2) Reduction in HAP Contract Units [Notice PIH 2019-23]

- (a) Project owners are required to make available for occupancy by eligible tenants the number of assisted units under the terms of the HAP contract.
- (b) Opportunity Home may not reduce the number of assisted units without written HUD approval. Any HUD approval of Opportunity Home's request to reduce the number of assisted units under contract is subject to conditions that HUD may impose. MTW agencies may not alter this requirement.
- (c) If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, Opportunity Home must reinstate the unit after the family has vacated the property. If the project is partially assisted, Opportunity Home may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207, or where the development has "floating" units.

21.4.D HAP Contract Year and Anniversary Dates [24 CFR 983.207(b)(2) and (g), and 24 CFR 983.302(e)]

- (1) The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.
- (2) The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year. There is a single annual anniversary date for all units under a particular HAP contract.

21.4.E Owner Responsibilities Under the HAP Contract [24 CFR 983.210]



- (1) When the owner executes the HAP contract, they certify that at such execution and at all times during the term of the HAP contract:
 - (a). The owner is maintaining the premises and contract units in accordance with housing quality standards;
 - (b). The owner is providing all services, maintenance, equipment, and utilities as agreed to under the HAP contract and the leases;
 - (c). Each contract unit for which the owner is receiving HAP is leased to an eligible family referred by Opportunity Home or selected from the owner-maintained waiting list, and the lease is in accordance with the HAP contract and HUD requirements;
 - (d). To the best of the owner's knowledge, the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
 - (e). The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit (unless needed as a reasonable accommodation);
 - (f). The amount of the HAP the owner is receiving is correct under the HAP contract;
 - (g). The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
 - (h). Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit;
 - (i). The family does not own or have any interest in the contract unit (this does not apply to the family's membership in a cooperative); and
 - (j). Repair work on the project selected as an existing project that is performed after HAP contract execution within such post-execution period as specified by HUD may constitute development activity, and if determined to be development activity, the repair work undertaken shall be in compliance with Davis-Bacon wage requirements.



21.5 Selection of PBV Program Participants

21.5.A Overview

- (1) Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

21.5.B Prohibited Rescreening of Existing Tenants Upon Conversion [Notice PIH 2019-23]

- (1) Current households cannot be excluded from occupancy at the covered project based on any rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion, but will be subject to any ongoing eligibility requirements for actions that occur after conversion.
- (2) Post-conversion, the tenure of all residents of the covered project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified by Notice PIH 2019-23 (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at the time of conversion would continue to be treated as an assisted unit.
- (3) Thus, 24 CFR 982.201, concerning eligibility and targeting, will not apply to current households. Once that remaining household moves out, the unit must be leased to an eligible family. Existing residents at the time of conversion may not be rescreened for citizenship status or have their social security numbers reverified.
- (4) Further, so as to facilitate the right to return to the assisted property, this provision must apply to current public housing residents of the converting project who will reside in legacy non-RAD PBV units placed in a project that contains RAD PBV units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR 983 for legacy non-RAD PBV. Any legacy non-RAD PBV units located in the same project are also subject to the right to return.



- (5) For the RAD PBV program, in-place family means a family that lived in a pre-conversion property at the time assistance was converted from public housing to PBV under RAD.

21.5.C Eligibility For PBV Assistance [24 CFR 983.251(a) and (b)]

- (1) Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program using information received and verified by Opportunity Home within a period of 60 days before commencement of PBV assistance.
- (2) For all families, Opportunity Home must determine if the total tenant payment for the family is less than the gross rent, such that the unit will be eligible for a monthly HAP. Applicants must qualify as a family as defined by HUD and Opportunity Home, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)].
- (3) In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to Opportunity Home's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. Opportunity Home may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

(c) Opportunity Home will determine an applicant family's eligibility for the RAD PBV program in accordance with the policies in Chapter 3.

21.5.D Organization of the Waiting List [24 CFR 983.251(c); Notice PIH 2019-23]

- (1) The standard PBV regulations at 24 CFR 983.251 set out program requirements related to establishing and maintaining a waiting list from which residents will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. Any legacy non-RAD PBV units located in the same project are also subject to these requirements.



- (2) Applicants who will occupy units with PBV assistance must be selected from the waiting list for the PBV program. Opportunity Home or the owner (as applicable) may establish selection criteria or preferences for occupancy of particular PBV units. Opportunity Home may place families referred by the PBV owner on its PBV waiting list.
- (3) Opportunity Home must establish in the administrative plan the options it will use to structure the PBV waiting list. Opportunity Home may:
 - (a) Use a separate, central, waiting list comprised of more than one or all PBV projects;
 - (b) Use the same waiting list for both tenant-based and some or all PBV projects;
 - (c) Use a separate waiting list for PBV units in individual projects or buildings (or for sets of such units) (which may be used in combination with either of the above options and may be maintained by the owner); or
 - (d) Merge the PBV waiting list with a waiting list for other assisted housing programs offered by Opportunity Home.
- (4) If Opportunity Home chooses to offer a separate waiting list for PBV assistance, Opportunity Home must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance. Opportunity Home must specify the name of the PBV projects in its administrative plan.

- (a) Opportunity Home will maintain a community-wide waiting list for the organization's PBV program. Within that list, Opportunity Home will designate subparts to easily identify who should be offered the next available unit(e.g., general-occupancy developments, elderly/disabled developments).
- (b) For any applicants on the public housing waiting list that are likely to be ineligible for admission to a covered project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, Opportunity Home will consider transferring such household, consistent with program requirements for administration of waiting lists, to Opportunity Home's remaining public housing waiting lists or to another voucher waiting list, in addition to transferring such household to the waiting list for the covered project.
- (c) To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait lists to which their



application was transferred in accordance with the date and time of their application to the original waiting list.

21.5.E Selection from the Waiting List [24 CFR 983.251(c)]

- (1) After conversion to RAD PBV, applicants who will occupy units with RAD PBV assistance must be selected from the waiting list. Opportunity Home may establish selection criteria or preferences for occupancy of particular PBV units.
- (2) **Income Targeting [24 CFR 983.251(c)(9); Notice PIH 2019-23]**
 - (a) At least 75 percent of the families admitted to Opportunity Home's tenant-based and project-based voucher programs during Opportunity Home's fiscal year from the waiting list must be extremely low-income families. The income targeting requirement applies to the total of admissions to both programs.
 - (b) Families in place at the time of the conversion are exempt from income targeting requirements. New admissions follow standard PBV requirements. Any legacy non-RAD PBV units located in the same project are also subject to these requirements.
- (3) **Units with Accessibility Features [24 CFR 983.251(c)(9)]**
 - (a) Families who require particular accessibility features for persons with disabilities must be selected first to occupy PBV units with such accessibility features. Opportunity Home must have some mechanism for referring to accessible PBV units a family that includes a person with a mobility or sensory impairment.
- (4) **Preferences [24 CFR 983.251(d); FR Notice 11/24/08; Notice PIH 2019-23]**
 - (a) Opportunity Home may establish in its administrative plan any preferences for occupancy of particular units, including the name of the projects and the specific preferences that are to be used by projects.
 - (b) Criteria for occupancy of units (e.g., elderly families) may also be established; however, selection of families must be done through admission preference.
 - (c) Opportunity Home may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units.



(d) Opportunity Home will not offer any preferences for the RAD PBV program. However, Opportunity Home will give priority to participants moving under a VAWA emergency transfer from one PBV development to another.

21.5.F Offer of PBV Assistance

(1) Refusal of Offer [24 CFR 983.251(e)]

(a) If a family refuses Opportunity Home's offer of PBV assistance or the owner rejects a family for admission to the owner's PBV units, the family's position on the Opportunity Home waiting list for tenant-based assistance is not affected, regardless of the type of PBV waiting list used by Opportunity Home. The impact (of a family's rejection of the offer or the owner's rejection of the family) on a family's position on the PBV waiting list will be determined as follows:

- (i) If a central PBV waiting list is used, Opportunity Home's administrative plan must address the number of offers a family may reject without good cause before the family is removed from the PBV waiting list and whether the owner's rejection will impact the family's place on the PBV waiting list.
- (ii) If a project-specific PBV waiting list is used, the family's name is removed from the project's waiting list connected to the family's rejection of the offer without good cause or the owner's rejection of the family. The family's position on any other project-specific PBV waiting list is not affected.
- (iii) Opportunity Home must define good cause in its administrative plan. Opportunity Home's definition of good cause must include, at a minimum, that:
 - (A) The family determines the unit is not accessible to a household member with a disability or otherwise does not meet the member's disability-related needs;
 - (B) The unit has housing quality standards deficiencies;
 - (C) The family is unable to accept the offer due to circumstances beyond the family's control (such as hospitalization, temporary economic hardship, or natural disaster); and



(D) The family determines the unit presents a health or safety risk to a household member who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

(iv) Opportunity Home will define good cause for rejection of a unit offer as any of the factors listed above.

(b) Opportunity Home is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

(i) Refusing to list the applicant on the waiting list for tenant-based voucher assistance

(A) However, Opportunity Home is not required to open a closed waiting list to place the family on that waiting list.

(ii) Denying any admission preference for which the applicant qualifies

(iii) Changing the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under Opportunity Home's selection policy

(iv) Removing the applicant from the tenant-based voucher waiting list

(2) Acceptance of Offer [24 CFR 983.252(a) and (b)]

(a) Family Briefing

(i) When a family accepts an offer for PBV assistance, Opportunity Home must give the family an oral briefing. The briefing must include information on how the program works, the responsibilities of the family and owner, and the family's right to move.

(ii) In addition to the oral briefing, Opportunity Home must provide a briefing packet that contains the following information:

(A) How Opportunity Home determines the total tenant payment for a family;

(B) The family obligations under the program;



- (C) Information on federal, state, and local equal opportunity laws, the contact information for the Section 504 coordinator, a copy of the housing discrimination complaint form, and information on how to request a reasonable accommodation or modification under Section 504, the Fair Housing Act, and the Americans with Disabilities Act;
- (D) Opportunity Home subsidy standards, including when Opportunity Home will consider granting exceptions to the standards, and when exceptions are required as a reasonable accommodation for a person with disabilities under Section 504, the Fair Housing Act, or the Americans with Disabilities Act; and
- (E) The family's right to move.

(iii) Opportunity Home and the family must sign the statement of family responsibility.

(3) Persons with Disabilities

(a) Opportunity Home must take appropriate steps to ensure effective communication, in accordance with 24 CFR 8.6 and 28 CFR part 35, subpart E, and must provide information on the reasonable accommodation process, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, Opportunity Home must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

(4) Persons with Limited English Proficiency [24 CFR 983.252(d)]

(a) Opportunity Home must take reasonable steps to ensure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964, HUD's implementing regulation at 24 CFR Part 1, Executive Order 13166 (see Chapter 2), and HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732) or successor authority.



21.5.G Leasing of Contract Units [24 CFR 983.252](1)

- (1) The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease.
- (2) An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)]. The owner must provide a copy of the rejection notice to Opportunity Home. During the term of the HAP contract, the owner must lease contract units to eligible families that are selected from the waiting list for the PBV program. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on Opportunity Home's subsidy standards.

(3) Leasing [24 CFR 983.253(a)]

- (a) During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by Opportunity Home from the waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on Opportunity Home's subsidy standards.

(4) Filling Vacancies [24 CFR 983.254(a)]

- (a) The owner must promptly notify Opportunity Home of any vacancy or expected vacancy in a contract unit. After receiving such notice, Opportunity Home must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies within 30 calendar days. Opportunity Home and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

- (b) The owner must notify Opportunity Home in writing via email within five business days of learning about any vacancy or expected vacancy.
- (c) Opportunity Home will make every reasonable effort to refer families determined eligible to the owner for a suitability determination within 30 calendar days of receiving such notice from the owner. If the owner rejects the family after conducting a suitability screening, the owner must provide a copy of the rejection notice to Opportunity Home.



(d) The owner may not offer a unit to a family until Opportunity Home determines that the family is eligible for the program and has given the owner written confirmation.

21.5.H Tenant Screening [24 CFR 983.255]

(1) Opportunity Home Option

(a) Opportunity Home is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, Opportunity Home may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

(i) Opportunity Home will not conduct screening to determine a PBV applicant family's suitability for tenancy.

(b) Opportunity Home must provide the owner with an applicant family's current and prior address (as shown in Opportunity Home records) and the name and address (if known by Opportunity Home) of the family's current landlord and any prior landlords.

(c) In addition, Opportunity Home may offer the owner other information Opportunity Home may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. Opportunity Home must provide applicant families a description of Opportunity Home's policy on providing information to owners, and Opportunity Home must give the same types of information to all owners.

(d) The protections for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking in 24 CFR part 5, subpart L, apply to tenant screening. Opportunity Home may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(c)].

(1) Owner Responsibility



(a) The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families, the owner may consider a family's background with respect to the following factors:

(i) Payment of rent and utility bills

(ii) Caring for a unit and premises

(iii) Respecting the rights of other residents to the peaceful enjoyment of their housing

(iv) Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others

(v) Compliance with other essential conditions of tenancy



21.6 Occupancy

21.6.A Overview

After an applicant has been selected from the waiting list, determined eligible by Opportunity Home, referred to an owner, and determined suitable by the owner, the family will sign the lease, and occupancy of the unit will begin.

21.6.B Lease [24 CFR 983.256]

- (1) The tenant must have legal capacity to enter into a lease under state and local law. Legal capacity means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.
- (2) The tenant and the owner must enter into a written lease agreement that is signed by both parties. The tenancy addendum must include, word-for-word, all provisions required by HUD.
- (3) **Lease Requirements [24 CFR 983.256(c); Notice PIH 2019-23; Notice PIH 2025-03, Supplemental Notice 4C]**
 - (a) The lease for a PBV unit must specify all of the following information:
 - (i) The names of the owner and the tenant;
 - (ii) The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
 - (iii) The term of the lease (initial term and any provision for renewal);
 - (iv) The amount of the tenant rent to the owner, which is subject to change during the term of the lease in accordance with HUD requirements;
 - (v) A specification of the services, maintenance, equipment, and utilities that will be provided by the owner;
 - (vi) The amount of any charges for food, furniture, or supportive services; and
 - (vii) For any family admitted following conversion, the lease must specify what will happen if the family elects to remain in its unit after increasing its income such that it requires zero HAP. Specifically, the lease must make clear how the



tenant rent will be calculated, and it must address the transition to a new lease. The PHA must include resident procedural rights for termination notification and grievance procedures in the owner's lease. These requirements are not part of the regular PBV program but are required under RAD.

(4) The lease terms and provisions, including all addenda and referenced documents such as House Rules, must:

- (a) Be reasonable, use plain language, and must not contain provisions that conflict with resident rights described in Notice PIH 2025-03 or requirements of the PBV program.
- (b) Be available in multiple languages as needed and written in a manner accessible to people with disabilities.
- (c) For any residences that qualify as "target housing" under 42 U.S.C. 4851b, comply with the Lead Disclosure Rule, as codified in 24 CFR part 35, subpart A.

(5) The lease must not:

- (a) Require a new security deposit for residents in place at the time of conversion.
- (b) Prohibit residents' pets in place at the time of conversion.
- (c) Be onerous or difficult for residents to understand and should not impose overly restrictive rules about what residents may or may not do in their homes.

(6) **Tenancy Addendum [24 CFR 983.256(d)]**

- (a) The tenancy addendum in the lease must state:
 - (i) The program tenancy requirements
 - (ii) The composition of the household as approved by Opportunity Home (the names of family members and any Opportunity Home-approved live-in aide)
- (b) All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

(7) **Initial Term and Lease Renewal [24 CFR 983.256(f); RAD PBV Quick Reference Guide 6/20]**

- (a) Leases for residents who will remain in place (i.e., who will not be relocated solely as a result of conversion) must have an



effective date that coincides with—and must be signed on or before—the effective date of the RAD PBV HAP contract.

(b). The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g., month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

(i) The owner terminates the lease for good cause

(ii) The tenant terminates the lease

(iii) The owner and tenant agree to terminate the lease

(iv) Opportunity Home terminates the HAP contract

(v) Opportunity Home terminates assistance for the family

(8) Changes in the Lease [24 CFR 983.256(e)]

(a). If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

(b) The owner must notify Opportunity Home in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by Opportunity Home and in accordance with the terms of the lease relating to its amendment.

(c). Opportunity Home must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in the calculation of the rent to the owner from the effective date of the change.

(9) Owner Termination of Tenancy [24 CFR 983.257; Notice PIH 2019-23]

(a). With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose. The regulations at 24 CFR 5.858 through 5.861 on eviction for drug and alcohol abuse and 24 CFR part 5, subpart L



(Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking) apply to the PBV program.

(b). Projects converting from public housing to PBV under RAD have additional procedural rights that do not apply to the standard PBV program. These procedural rights must be included in the owner's lease as well as Opportunity Home's administrative plan. In addition to the regulations at 24 CFR 983.257 related to project owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that Opportunity Home provide adequate written notice of termination of the lease, which may not be less than:

(i) A reasonable period of time, but not to exceed 30 days:

- (A) If the health or safety of other tenants, Opportunity Home employees, or persons residing in the immediate vicinity of the premises is threatened, or
- (B) In the event of any drug-related or violent criminal activity or any felony conviction

(ii) Not less than 30 days in the case of nonpayment of rent

(iii) Not less than 30 days in any other case, except that if a state or local law provides for a shorter period of time, such shorter period will apply

(c). These provisions apply to legacy non-RAD PBV units located in the project as well.

(d) Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

(i) The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by Opportunity Home policy. According to program requirements, the family's assistance must be terminated if they are absent from the unit for more than 180 consecutive days. Opportunity Home termination of assistance actions due to family absence from the unit are subject to 24 CFR 982.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.



(10) Continuation of Housing Assistance Payments [24 CFR 983.258; Notice PIH 2019-23; Notice PIH 2023-19; RAD Supplemental Notice 4B; RAD PBV Quick Reference Guide 6/20]

(a) Pre-Conversion Residents

- (i) The unit for a family with a TTP that equals or exceeds the gross rent (which is defined as the contract rent plus any utility allowance for the unit) must be placed on the PBV HAP contract and the family must be admitted to the PBV program. In this case, and until such time as the family's TTP falls below the gross rent, the family will pay the owner the alternate rent which is defined as the lesser of:
 - (A) The family's TTP minus the utility allowance (subject to any required phase-in); or
 - (B) The Zero HAP Rent Cap, which is the lower of:
 - (1) 110 percent of the applicable FMR minus the utility allowance; or
 - (2) In the event the units are subject to more restrictive rent setting requirements under the LIHTC or HOME programs (or other programs approved by HUD on a project-specific basis, the rent to owner set to comply with such requirements.
- (ii) The family will continue to pay this amount until/if circumstances change, and HAP is paid on their behalf. In other words, assistance may subsequently be reinstated if the tenant becomes eligible for assistance, in which case normal PBV rent requirements will apply to the family. In such cases, the resident is still considered a program participant. All of the family obligations and protections under RAD and standard PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the NSPIRE standards, apply as long as the unit is under HAP contract or added back to the HAP Contract. Any legacy non-RAD PBV units located in the same project are also subject to these requirements.
- (iii) After a family has paid the Zero HAP Rent Cap for a period of 180 days, Opportunity Home must remove the unit from the HAP Contract, and the family's participation in the PBV program ends. If the Covered Project is fully assisted and



the family subsequently leaves the property, Opportunity Home must reinstate the unit back onto the HAP contract and admit an eligible family. If the Covered Project is partially assisted and the family subsequently leaves the property, the unit must be reinstated back onto the HAP contract unless Opportunity Home previously substituted a different unit on the HAP contract in accordance with 24 CFR § 983.207 or, where “floating units” have been permitted.

(iv) Additionally, if the family continues to reside in the project after the family’s unit was removed from the HAP contract, the family may request to return to the PBV program if the family’s income subsequently decreases to the extent that the family’s TTP is less than the Zero-HAP Rent Cap, and the family is otherwise eligible for PBV assistance. Opportunity Home must, at the earliest opportunity, reinstate the family’s unit back onto the HAP contract to provide rental assistance to the family. If the project was partially assisted and Opportunity Home previously substituted a different unit on the HAP contract, the PHA must substitute the family’s unit for a vacant unit on the HAP contract if there is a vacant unit at the time of the request, or by doing so as soon as a unit on the HAP contract becomes vacant if there are no vacant units on the HAP contract at the time of the family request

(b) New Admission Families

- (i) Unless a waiver is requested and approved, following conversion, 24 CFR 983.53(d) applies, and any new admission referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. This means a family’s TTP may not equal or exceed the gross rent for the unit at admission.
- (ii) Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. If the project is fully assisted and the family subsequently leaves the property, Opportunity Home must reinstate the unit after the family has vacated the property and admit an eligible family. If the project is partially assisted, Opportunity Home may substitute a different unit for the unit on the



HAP contract in accordance with 24 CFR 983.207 or where floating units have been permitted.

(iii) In circumstances where low RAD PBV rents may prohibit a significant number of otherwise eligible families on the waiting list from being admitted to the project because they do not require subsidy, and which could consequently create an undue concentration of poverty at the project compared to legacy non-RAD PBV projects, Opportunity Home may request a waiver from HUD for the covered project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if Opportunity Home has not paid HAP for the family in 180 days. The waiver will apply the alternative requirements applicable to the pre-conversion residents to new admission families.

(iv) Opportunity Home will not request waivers from HUD to apply the alternative requirements applicable to pre-conversion residents to new admission families.

(v) If a participating family who was admitted after the RAD conversion receives zero assistance and subsequently experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify Opportunity Home of the change and request an interim reexamination before the expiration of the 180-day period.

(11) Security Deposits [24 CFR 983.259; RAD PBV Quick Reference Guide 6/20]

(a) Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. If a tenant residing in a converting project has not previously provided a security deposit, then the owner may collect a security deposit at the time of initial lease execution. Otherwise, the security deposit requirements for standard PBV apply

(b) The owner may collect a security deposit from the tenant. Opportunity Home may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.



(i) Opportunity Home will allow the owner to collect a security deposit amount the owner determines is appropriate.

(b) When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

(b) The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

(b) If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. Opportunity Home has no liability or responsibility for payment of any amount owed by the family to the owner.

21.6.C Public Housing FSS And ROSS Participants [Notice PIH 2019-23 and Notice PIH 2025-03, Supplemental Notice 4C]

(1) Current public housing FSS participants must be allowed to continue to participate in Opportunity Home's FSS program for the duration of the grant's period of performance, and Opportunity Home will be allowed to use any PH FSS funds granted previously or pursuant to the current fiscal year (FY) PH FSS notice of funding opportunity (NOFO) to serve those FSS participants who live in units converted to RAD and who will, as a result, be moving to the HCV FSS program.

(2) Opportunity Home must convert the PH FSS program participants at the covered project to their HCV FSS program. No special provisions are required to continue serving FSS participants who live in public housing units converting to PBV through RAD.

(3) Residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.



- (4) At the completion of the FSS grant, Opportunity Home should follow the normal closeout procedures outlined in the grant agreement and any applicable 24 CFR part 200 requirements. If Opportunity Home continues to run an FSS program that serves public housing and/or HCV (including PBV) participants, Opportunity Home will continue to be eligible (subject to NOFOA requirements) to apply for FSS funding.
- (5) Current Resident Opportunities and Self-Sufficiency-Service Coordinators (ROSS-SC) program grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD and Opportunity Home, or the new Project Owners may apply for their ROSS-SC grant to be renewed, subject to requirements of the ROSS-SC NOFO. In addition, projects where the project previously received a ROSS-SC grant prior to conversion but were ineligible to renew the grant after conversion are eligible to apply for a ROSS-SC grant, subject to the requirements of the ROSS-SC NOFO.
- (6) At the completion of the ROSS-SC grant, Opportunity Home should follow the normal closeout procedures outlined in the grant agreement.
- (7) To facilitate the uniform treatment of residents and units at a project previously served by a ROSS-SC grant, any legacy non-RAD PBV units in a project that replace former public housing at the time of conversion are also subject to the terms of this provision.

21.6.D Resident Participation and Funding [Notice PIH 2019-23]

- (1) Residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

21.6.E Moves

- (1) **Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260; Notice PIH 201923]**
 - (a) All in-place tenants at the time of conversion are eligible to remain in the project. Overhoused families should be moved into appropriately sized units if such units are available in the new or rehabbed project. If appropriately sized units are not available, the existing tenants may continue to be over-housed until an appropriately sized unit becomes available or until the tenant leaves the project. Once the unit turns over, it must be leased to



an appropriately sized family. Any legacy non-RAD PBV units located in the same project are also subject to these requirements.

(b) Following conversion, the standard PBV regulations apply. If Opportunity Home determines that a family is occupying a wrong-size unit, based on the Opportunity Home's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, Opportunity Home must promptly notify the family and the owner of this determination, and within 60 days of the determination, Opportunity Home must offer the family the opportunity to receive continued housing assistance in another unit.

(i) Opportunity Home will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 60 days of Opportunity Home's determination. Opportunity Home will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

- (A) PBV assistance in an appropriately sized unit in the same building or project
- (B) PBV assistance in an appropriately sized unit in another project
- (C) Tenant-based voucher assistance

(c) If no continued housing assistance is available, Opportunity Home must remove the wrong-sized or accessible unit from the HAP contract to make voucher assistance available to issue the family a tenant-based voucher.

(d) If Opportunity Home offers the family a tenant-based voucher, Opportunity Home must terminate the housing assistance payments for a wrong-size or accessible unit at the earlier of the expiration of the term of the family's voucher, including any extension granted by Opportunity Home, or the date upon which the family vacates the unit. If the family does not move out of the wrong-size unit or accessible unit by the expiration of the term of the family's voucher, Opportunity Home must remove the unit from the HAP contract.



(e) If Opportunity Home offers the family another form of assistance that is not a tenant-based voucher, Opportunity Home must terminate the housing assistance payments for the wrong-sized or accessible unit and remove the unit from the HAP contract when:

- (i) Opportunity Home has offered PBV assistance or other project-based assistance in an appropriately sized unit, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by Opportunity Home (not to exceed 90 days); or
- (ii) Opportunity Home has offered other comparable tenant-based rental assistance, the family either accepts or does not accept the offer, but does not move out of the PBV unit within a reasonable time as determined by Opportunity Home (not to exceed 90 days).
- (iii) In either of the above situations, the family may request, and Opportunity Home may grant, one extension not to exceed up to an additional 90 days to accommodate the family's efforts to locate affordable, safe, and geographically proximate replacement housing.
- (iv) Opportunity Home must terminate the housing assistance payments for the wrong-sized or accessible unit and remove the unit from the HAP contract when Opportunity Home has offered PBV assistance or other project-based assistance in an appropriately sized unit, and the family accepts the offer but does not move out of the PBV unit within a reasonable time as determined by Opportunity Home (not to exceed 90 days). No extensions may be granted in this case. Opportunity Home may reinstate a unit removed unit to the HAP contract after the family vacates the property, in accordance with 24 CFR 983.207(b).

(A) When Opportunity Home offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, Opportunity Home will



terminate the housing assistance payments at the expiration of this 30-day period.

- (B) Except in the case of an offer by Opportunity Home of PBV assistance or other project-based housing assistance in an appropriate size unit, the family accepts the offer but does not move out, Opportunity Home may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member, or to accommodate the family's efforts to locate affordable, safe, and geographically proximate replacement housing. The family must make such a request in writing prior to the end of the 30-day period. Opportunity Home will only grant one extension, which will not exceed an additional 30 days.

(2) Family Right to Move [24 CFR 983.261]

- (a) The family may terminate the lease at any time after one year of PBV assistance. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to Opportunity Home. The right to request a move with tenant-based assistance does not expire, and the family may request a move at any time after the one-year period has expired.

(3) Choice Mobility [Notice PIH 2019-23; PRRAC Choice Mobility Implementation Guidance, 8/20]

(a) Family's Right to Choice Mobility

- (i) Under RAD PBV, the choice mobility option provides families with the opportunity to move with continued assistance any time after 12 months of occupancy. All residents in converted properties should be aware of their housing mobility rights and of their options in a range of neighborhoods.

- (ii) As authorized by MTW Activity FY2015-3, Opportunity Home is not required to offer the family a tenant-based voucher to a household that wishes to relocate from a unit tied to a project-based voucher.



(b) Moving with Continued Assistance under Choice Mobility

- (i) If the family wishes to move with continued tenant-based assistance under choice mobility, the family must contact Opportunity Home to request the rental assistance prior to providing notice to terminate the lease. If the family terminates the lease in accordance with lease requirements, Opportunity Home is required to offer the family the opportunity for continued tenant-based assistance in the form of a voucher or other comparable tenant-based rental assistance.
- (ii) Opportunity Home must specify in the administrative plan whether it will offer families assistance under the voucher program or other comparable tenant-based rental assistance. If voucher assistance is offered to the family and the search term expires, Opportunity Home must issue the voucher to the next eligible family before issuing another voucher to the family that requested to move. If a voucher or other comparable tenant-based assistance is not immediately available at the time of the family's request to Opportunity Home, Opportunity Home must give the family priority to receive the next available opportunity for continued tenant-based assistance. Opportunity Home must describe in its administrative plan its policies and procedures for how the family must contact Opportunity Home and how Opportunity Home documents families waiting for continued tenant-based rental assistance.
- (iii) Families are eligible to move with continued assistance under choice mobility after 12 months of occupancy. If the family terminates the assisted lease before one year of PBV assistance, the family relinquishes the opportunity for continued tenant-based assistance.
- (iv) As authorized by MTW Activity FY2015-3, Opportunity Home is not required to offer a family a tenant-based voucher to a household that wishes to relocate from a unit tied to a project-based voucher.

(c) Turnover Cap

- (i) If, as a result of RAD, the total number of PBV units (including RAD PBV units) administered by Opportunity Home exceeds 20 percent of Opportunity Home's



authorized units under its HCV ACC with HUD, Opportunity Home may establish a turnover cap. Opportunity Home is not required to provide more than three-quarters of its turnover vouchers in any single year to the residents of covered projects. If Opportunity Home chooses to establish a turnover cap and the cap is implemented, Opportunity Home must create and maintain a waiting list in the order requests from eligible households are received.

- (A) As a result of RAD, the total number of PBV units (including RAD PBV units) administered by Opportunity Home exceeds 20 percent of Opportunity Home's authorized units under its HCV ACC with HUD. Therefore, Opportunity Home will establish a choice mobility cap. Opportunity Home will not provide more than three-quarters of its turnover vouchers in a single year to residents of covered projects.
- (B) Families who requested a choice mobility voucher and were denied due to the cap will be given priority the following year when choice mobility vouchers are again issued, since the choice mobility list will be organized by the date and time of the family's request.

(4) Emergency Transfers under VAWA [24 CFR 983.261(f) and (g)]

- (a) In the case of a move due to domestic violence, dating violence, sexual assault, stalking, or human trafficking, Opportunity Home must describe policies for facilitating emergency transfers for families with PBV assistance in their Emergency Transfer Plan, including when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.
- (b) When the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and the move is needed to protect the health or safety of the family or family member, the family is not required to give the owner advance written notice or contact Opportunity Home before moving from the unit. Additionally, when any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move, the family is not required to give the owner advance written notice or contact



Opportunity Home before moving from the unit. Opportunity Home may not terminate the assistance of a family due to a move occurring under these circumstances and must offer the family the opportunity for continued tenant-based assistance if the family had received at least one year of PBV assistance prior to moving.

(c) If a family break-up results from an occurrence of domestic violence, dating violence, sexual assault, stalking, or human trafficking, Opportunity Home must ensure that the victim retains assistance.

(i) Except where special consideration is needed for the project-based voucher program, Opportunity Home will follow VAWA policies as outlined in Chapter 16, Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA.

(ii) When the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking has lived in the unit for less than one year, Opportunity Home will provide several options for continued assistance.

(iii) Opportunity Home will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where Opportunity Home has PBV units. Opportunity Home will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

(iv) If no units are available for an internal transfer to a PBV development or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the Opportunity Home's public housing program. Such a decision will be made by Opportunity Home based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. Opportunity Home has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking in both its HCV and public housing programs in order to expedite this process. See Section 4.3.C. of this administrative plan.



- (v) If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, Opportunity Home will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where Opportunity Home has PBV units. Opportunity Home will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.
- (vi) If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may request an external emergency transfer to Opportunity Home's public housing program for which they are required to apply. Opportunity Home has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking as part of the public housing ACOP in order to expedite this process.

21.6.F Reexaminations [RAD PBV Quick Reference Guide 6/20]

- (1) A family living in a unit converted from public housing to RAD PBV may retain its certification date. Unless a family's annual reexamination is due at the same time as the effective date of the RAD PBV HAP contract, Opportunity Home does not need to recertify tenants at the point of conversion.
- (2) For each family residing in a unit undergoing conversion of assistance under RAD, the administering PHA will have to submit a form HUD-50058 reflecting the family's admission to the voucher program. The effective date of the new admission will be the same as the effective date of the RAD PBV HAP contract. The form should include the same information previously found on the public housing form 50058, including the next annual reexamination date.

21.6.G Residents' Procedural Rights [Notice PIH 2019-23]

- (1) HUD is incorporating additional termination notification requirements for public housing projects that convert assistance under RAD to PBV and to legacy non-RAD PBV units located in the same project beyond those for the standard PBV program. In addition to the regulations at 24 CFR 983.257 related to owner termination of tenancy and eviction



(which MTW agencies may not alter), the termination procedure for RAD conversions to PBV requires that Opportunity Home provide adequate written notice of termination of the lease, which is:

- (a) A reasonable period of time, but not to exceed 30 days:
 - (i) If the health or safety of other tenants, project owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - (ii) In the event of any drug-related or violent criminal activity or any felony conviction.
- (b) Not less than 30 days in the case of nonpayment of rent.
- (c) Not less than 30 days in any other case, except that if a state or local law provides for a shorter period of time, such shorter period will apply.

21.6.H Informal Reviews and Hearings [Notice PIH 2019-23]

- (1) In addition to reasons for an informal hearing listed at 24 CFR 982.555(a)(1)(i)-(v) (See 16-III.C. Informal Hearings for Participants), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - (a) For any hearing required under 24 CFR 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing in accordance with Chapter 16 Part III: Informal Reviews and Hearings, as is the current standard in the program.
 - (b) For any additional hearings required under RAD, Opportunity Home (as owner) will perform the hearing.
- (2) An informal hearing will not be required for class grievances or for disputes between residents not involving Opportunity Home (as owner) or the contract administrator. This hearing requirement does not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and Opportunity Home (as owner) or contract administrator.
- (3) The owner must give residents notice of their ability to request an informal hearing as outlined in 24 CFR 982.555(c)(1) for informal



hearings that will address circumstances that fall outside of the scope of 24 CFR 982.555(a)(1)(i)–(v). (See Chapter 16)

(4) The owner must provide an opportunity for an informal hearing before an eviction.



21.7 Determining Contract Rent

21.7.A Initial Contract Rents [Notice PIH 2019-23]

- (1) RAD conversions are intended to be cost-neutral, and therefore, should not exceed current public housing funding as adjusted for unit size. Since public housing units do not currently have contract rents, HUD provides an estimate of current contract rents for each PHA's public housing units based on current funding as adjusted by bedroom size.
- (2) Current funding includes operating subsidy, tenant rents, capital funds, replacement housing factor funds (RHF), and demolition disposition transitional funding (DDTF). The funding may limit the amount of initial rent for a property. A detailed explanation of the determination of current funding may be found in Attachment 1C of Notice PIH 2019-23. Once the current funding amount is calculated, the amount is adjusted by bedroom size to determine the current funding rent. HUD uses the same bedroom adjustment factors as in the metropolitan FMR schedules where the project is located. For RAD/Section 18 blends, HUD produces a single, blended rent schedule for all units.
- (3) Opportunity Home may adjust subsidy (and contract rents) across multiple projects as long as Opportunity Home does not exceed the aggregate subsidy for all of the projects Opportunity Home has submitted for conversion under RAD.
- (4) Notwithstanding HUD's calculation of the initial contract rent based on the project's subsidy under the public housing program and any modifications made to the initial contract rent, the initial rents are set at the lower of:
 - (a) An amount determined by Opportunity Home in accordance with the administrative plan, not to exceed 110 percent of the fair market rent (FMR) (or amount of any applicable exception payment standard), or the alternate rent cap in Opportunity Home's MTW agreement, minus any utility allowance
 - (b) The reasonable rent
 - (c) The rent requested by the owner

21.7.B Adjusting Contract Rents [Notice PIH 2019-23; RAD PBV Quick Reference Guide 6/20; PHA Asset Repositioning "How to Apply OCAF for RAD PBV" Webinar]



- (1) RAD PBV contract rents are adjusted differently than contract rents in the standard PBV program. At each annual anniversary of the HAP contract, contract rents will be adjusted only by HUD's operating cost adjustment factor (OCAF) that is applied to the current contract rent, less the portion of the rent paid for debt service, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.
- (2) Contract rents may not exceed the reasonable rent (as determined by Opportunity Home that administers the contract or the independent entity, as applicable), with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract.
- (3) However, the rent to owner may fall below the initial contract rent in the following situations:
 - (a) To correct errors in calculations in accordance with HUD requirements
 - (b) If additional housing assistance has been combined with PBV assistance after the execution of the initial HAP contract, and a rent decrease is required pursuant to 983.55 (prohibition of excess public assistance)
 - (c) If a decrease in rent to the owner is required based on changes in the allocation of responsibility for utilities between the owner and the tenant
- (4) The contract rent adjustment will be the lesser of:
 - (a) The current contract rent increased by the operating cost adjustment factor (OCAF), which is published annually in the Federal Register; or
 - (a) The reasonable rent
- (5) The administering PHA (or independent entity, if the project is PHA-owned) is responsible for processing rent adjustments at each contract anniversary date in accordance with the prevailing OCAF. The PHA who administers the contract (directly or via an independent entity) must maintain records to demonstrate how OCAF amounts



were determined and how rent adjustments were calculated. HUD approval of rent adjustments is not required.

(6) Properties are eligible to receive prior years' OCAF adjustments for years in which the OCAF was not taken. The OCAF must be applied retroactively if it was missed. The PHA administering the contract (or the independent entity) must make sure that all OCAFs have been applied correctly since the RAD closing and calculate the current rents accordingly, including making sure that the RAD PBV contract rents do not exceed the PBV program caps.

(7) In extraordinary circumstances, a project owner may request a waiver of the rental adjustment by OCAF and receive a rental adjustment by an alternative operating cost factor. The waiver request with documentation demonstrating the need for an alternative operating cost factor rental adjustment must be submitted to the Office of Recapitalization in accordance with Supplemental Notice 4C.

(a) The owner will request a contract rent adjustment from Opportunity Home 120 days, but no less than 60 days, prior to the HAP contract anniversary date by submitting a completed OCAF rent adjustment worksheet (Form HUD-9624).

(8) Rent Decrease

Rents must not be reduced below the initial rent except to correct errors, for additional subsidy to the property, or to realign utility responsibilities.

21.7.C Utility Allowances [Notice PIH 2019-23; RAD PBV Quick Reference Guide 6/20]

- (1) When contract rent amounts are set initially, the amount does not include a utility allowance. In general, the utility allowances that are used on the initial HAP contract at closing are the public housing utility allowances that are in effect prior to conversion. The CHAP must be updated prior to conversion to reflect current public housing utility allowances. At its discretion, a PHA may use the FMRs and utility allowances in effect during the 30-day period immediately before the beginning date of the HAP contract.
- (2) After conversion, the PHA that administers the contract must maintain the utility allowance schedule. The PHA may either maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR



983.301(f)(2)(ii) and 24 CFR 982.517, respectively, or the PHA may instead apply site-specific utility allowances. HUD waived the requirement for the standard PBV program that the HCV utility allowance be used. If a site-specific utility allowance is used, the utility allowance is applicable to legacy non-RAD PBV units in the project and is calculated consistent with Notice H 201504.

(3) Each family transitions to the new utility allowance at their first recertification following conversion.

(i) Opportunity Home will use the HCV utility allowance schedule for the RAD PBV developments.

21.7.D Reasonable Rent [983.301(d) and 24 CFR 983.303]

(1) At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by Opportunity Home, except rents must not be reduced below the initial rent except to correct errors, for additional subsidy to the property, or to realign utility responsibilities.

(2) How to Determine Reasonable Rent [24 CFR 983.303(c)]

(a) The reasonable rent of a unit receiving PBV assistance must be determined by comparison to the rent for other comparable unassisted units. When making this determination, Opportunity Home must consider factors that affect market rent. Such factors include the location, quality, size, type, and age of the unit, as well as the amenities, housing services, maintenance, and utilities to be provided by the owner. The reasonable rent determination must be based on the condition of the assisted unit at the time of the determination and not on anticipated future unit conditions.

(a) Comparability Analysis [24 CFR 983.303(d)]

(i) For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that are receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable



unassisted units, and must be retained by Opportunity Home.

(ii) The comparability analysis may be performed by Opportunity Home staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

(b) Opportunity Home-Owned Units [24 CFR 983.303(f)]

(i) For Opportunity Home-owned units, the amount of the reasonable rent must be determined by an independent entity approved by HUD in accordance with PBV program requirements. The independent entity must provide a copy of the determination of reasonable rent for Opportunity Home-owned units to Opportunity Home.



21.8 Payments to Owner

21.8.A Housing Assistance Payments

- (1) During the term of the HAP contract, Opportunity Home must make housing assistance payments to the owner in accordance with the terms of the HAP contract. During the term of the HAP contract, payments must be made for each month that a contract unit complies with NSPIRE and is leased to and occupied by an eligible family. The housing assistance payment must be paid to the owner on or about the first day of the month for which payment is due, unless the owner and Opportunity Home agree on a later date.
- (2) Except for discretionary vacancy payments, Opportunity Home may not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).
- (3) The amount of the housing assistance payment by Opportunity Home is the rent to the owner minus the tenant rent (total tenant payment minus the utility allowance).
- (4) In order to receive housing assistance payments, the owner must comply with all provisions of the HAP contract. Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments.

21.8.B Vacancy Payments [24 CFR 983.352]

(1) Payment at Move-Out Month [24 CFR 983.352(a)]

- (a) If an assisted family moves out of the unit, the owner may keep the housing assistance payment for the calendar month when the family moves out. However, the owner may not keep the payment if Opportunity Home determines that the vacancy is the owner's fault.

- (i) If Opportunity Home determines that the owner is responsible for a vacancy and, as a result, is not entitled to keep the housing assistance payment, Opportunity Home will notify the owner of the amount of housing assistance payment that the owner must repay. Opportunity Home will require the owner to repay the amount owed in accordance with the policies in Section 16.4.B.

(2) Vacancy Payments



(a) At Opportunity Home's discretion, the HAP contract may provide for vacancy payments to the owner for an Opportunity Home-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. Opportunity Home must include in its administrative plan Opportunity Home's policy on the conditions under which it will allow vacancy payments in a HAP contract, the duration of the payments, the amount of vacancy payments it will make to an owner, and the required form and manner of requests for vacancy payments.

(i) Opportunity Home will decide on a case-by-case basis if Opportunity Home will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.

(b). Opportunity Home may only make vacancy payments if:

(i) The owner gives Opportunity Home prompt, written notice certifying that the family has vacated the unit and identifies the date when the family moved out (to the best of the owner's knowledge and belief);

(ii) The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;

(iii) The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and

(iv) The owner provides any additional information required and requested by Opportunity Home to verify that the owner is entitled to the vacancy payment.

(c). The owner must submit a request for vacancy payments in the form and manner required by Opportunity Home and must provide any information or substantiation required by Opportunity Home to determine the amount of any vacancy payment.

(d) The vacancy payment to the owner for each month of the maximum two-month period is determined by Opportunity Home and cannot exceed the monthly rent to the owner under the



assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit). Any vacancy payment may cover only the period the unit remains vacant.

- (i) If the HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified Opportunity Home of the vacancy in accordance with the policy in Section 18.5.G. regarding filling vacancies.
- (ii) In order for a vacancy payment request to be considered, it must be made in writing (including via email) within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications, and Opportunity Home may require the owner to provide documentation to support the request. If the owner does not provide the information requested by Opportunity Home within 10 business days of Opportunity Home's request, no vacancy payments will be made.
- (iii) If vacancy payments are made, Opportunity Home will make vacancy payments for the period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will not exceed the monthly rent to the owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit). Any vacancy payment will cover only the period the unit remains vacant.

21.8.C Tenant Rent to Owner [24 CFR 983.353; Notice PIH 2019-23]

- (1) The tenant's rent is the portion of the rent to the owner paid by the family. The amount of tenant rent is determined by Opportunity Home in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in Opportunity Home's notice to the family and owner.
- (2) The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by Opportunity Home is the maximum amount the owner may charge the family for rental of a contract unit. The tenant's rent



covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant's rent as determined by Opportunity Home. The owner must immediately return any excess payment to the tenant.

(a) Initial Certifications [Notice PIH 2019-23]

- (i) For the initial certification, Opportunity Home will use the family's public housing tenant rent (reflected on line 10f of the family's most recent 50058) at the date of conversion to calculate HAP and tenant rent for the PBV program. Opportunity Home will use this amount until the effective date of the earlier of the family's first regular or interim recertification following the conversion. At that point, Opportunity Home will use the family's TTP based on the recertification and the applicable utility allowance (HCV or RAD PBV site-based, as applicable) to determine PBV HAP and tenant rent.
- (ii) Any legacy non-RAD PBV units located in the same project are subject to the same requirements.

(b) Tenant and PHA Responsibilities

- (i) The family is not responsible for the portion of rent to the owner that is covered by the housing assistance payment and the owner may not terminate the tenancy of an assisted family for nonpayment by Opportunity Home.
- (ii) Likewise, Opportunity Home is responsible only for making the housing assistance payment to the owner in accordance with the HAP contract. Opportunity Home is not responsible for paying the tenant rent or any other claim by the owner, including damage to the unit. Opportunity Home may not use housing assistance payments or other program funds (including administrative fee reserves) to pay any part of the tenant's rent or other claim by the owner.

(c) Utility Reimbursements [24 CFR 983.353(d)]

- (i) If the amount of the utility allowance exceeds the total tenant payment, Opportunity Home must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant's rent to the owner must be zero.



(ii) Opportunity Home must describe in its administrative plan its policies on paying the utility reimbursement directly to the family or directly to the utility supplier. Opportunity Home may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If Opportunity Home chooses to pay the utility supplier directly, Opportunity Home must notify the family of the amount paid to the utility supplier.

(iii) Opportunity Home will make utility reimbursements directly to the family.

21.8.D Phase-In of Tenant Rent Increases [Notice PIH 2019-23; PHA Asset Repositioning “Phase-in of Tenant Rents” Webinar]

(1) For in-place tenants, if the amount the tenant would pay for rent and utilities (TTP) would increase by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over three years. To implement this provision, HUD is waiving section 3(a)(1) of the 1937 Act, as well as 24 CFR 983.3 (definition of total tenant payment (TTP)), only to the extent necessary to allow for the phase-in of tenant rent increases. For families who were on EID at the time of conversion to RAD PBV, upon the expiration of the EID, the rent adjustment is not subject to rent phase-in.

(2) Opportunity Home must communicate this policy in writing to affected residents. Any legacy non-RAD PBV units located in the same covered project are subject to the terms of the phase-in provisions.

(a) Opportunity Home will use the family’s public housing tenant rent (reflected on line 10f of the family’s most recent 50058) at the date of conversion to calculate the family’s tenant rent in PBV. Opportunity Home will apply TTP increases at the family’s next triennial recertification.

(3) Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.

(4) If the family’s income falls during the phase-in period such that the currently calculated PBV TTP falls below the amount that would otherwise be the phased-in rent, the family pays the currently calculated PBV TTP, and the phase-in ends.



- (5) Opportunity Home will communicate Opportunity Home's phase-in policy in writing to the family at the time Opportunity Home first determines that the family qualifies for a rent phase-in.
- (6) Any legacy non-RAD PBV units located in the same project are also subject to rent phase-in requirements.

21.8.E Other Fees and Charges [24 CFR 983.354]

(1) Meals and Supportive Services

- (a) With the exception of PBV assistance in assisted living developments, the owner may not require the tenant to pay charges for meals or supportive services. Non-payment of such charges is not grounds for termination of tenancy.
- (b) In assisted living developments receiving PBV assistance, the owner may charge for meals or supportive services. These charges may not be included in the rent to the owner, nor may the value of meals and supportive services be included in the calculation of the reasonable rent. However, non-payment of such charges is grounds for termination of the lease by the owner in an assisted living development.

(2) Other Charges by Owner

- (a) The owner may not charge extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premises.



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

The primary objectives of these proposed revisions to the Family Self-Sufficiency (FSS) Action Plan are to:

- Align policies with current rent simplification rules and U.S. Department of Housing and Urban Development (HUD) regulations (24 CFR Part 913).
- Enhance consistency in the administration of escrow accounts and supportive services.
- Modernize program reporting by ensuring demographic data reflects the current participant population.

Summary of Key Policy Changes for Review

Below is a summary of the proposed revisions, detailing the current policy and the suggested change.

1. Resident Service Coordinator Terminology

- **Current Policy:** The action plan language refers to Resident Service Coordinator(s).
- **Proposed Change:** Change the action plan language from Resident Service Coordinator(s) to Resident Service Specialists for all relevant sections.

2. Update Family Demographics (Section 1.2.F)

- **Current Policy:** This section includes a table detailing household demographics for the Housing Choice Voucher (HCV) and Public Housing programs based on FY20 data.
- **Proposed Change:** Include the most current demographics available to ensure accurate reporting of resident characteristics.

3. FSS Program Fund Use (Section 4.1.B)

- **Current Policy:** The FSS Program Fund, created from forfeited escrow accounts, is used for FSS program-related support, such as supportive service requests by FSS families or training of FSS Resident Service Coordinators to enhance service delivery.
- **Proposed Policy Change:** The fund will be used for FSS program-related support, such as supportive service requests by FSS families, group training and activities directly related to an FSS participant's ITSP, or training of FSS Resident Service Specialists to enhance service delivery.

4. Defining "Good Standing" and Lease Compliance (Section 5.1.C)

- **Current Policy (Lease Compliance Definition):** "For the purposes of the FSS Program,



comply with the lease means the FSS family has not been evicted for repeated or serious violations of the lease; or if they have been evicted for serious or repeated violations of the lease, the family has prevailed in either the grievance hearing or the informal hearing process."

- **Proposed Policy Change (Lease Compliance Definition):** "For the purposes of the FSS Program, comply with the lease means the FSS family must be current on any debts owed to Opportunity Home, has not defaulted on any Repayment Agreement Plans, has not been evicted for repeated or serious violations of the lease; or if they have been evicted for serious or repeated violations of the lease, the family has prevailed in either the grievance hearing or the informal hearing process."

5. Rent and Total Tenant Payment (TTP) Calculation (Section 6.1.B (3))

- **Current Policy (HCV):** For the HCV program, *family rent* is 30 percent of adjusted monthly income [24 CFR 984.305(b)(1)].
- **Proposed Policy Change (HCV):** For the HCV program, *family rent* is based on the HCV rent simplification policy [referenced in section 6.3.A(1)(f) of the Administrative Plan].

6. Interim Disbursement of FSS Account Funds (Section 6.1.C(2))

- **Current Policy:** Policy details for partial disbursement of escrow funds before contract completion for interim goals or one-time payment of ongoing expenses.
- **Proposed Policy Change (New Sub-sections):**
 - (ii.) Opportunity Home reserves the right to request that the family attend a meeting to clarify the withdrawal request before a determination is made, and/or may require additional documentation before making a decision.
 - (iii.) Opportunity Home will allow interim disbursement withdrawals not to exceed 50% of the participant's program lifetime accrued escrow. If sufficient funds are available, certain circumstances may allow withdrawals of more than 50% at Opportunity Home's discretion.

7. Use of Forfeited Escrow Funds Request Limits (Section 6.1.E)

- **Current Policy:** Requests for supportive service funds by FSS families in good standing may not exceed \$2,500 in a calendar year. The frequency of requests is not explicitly limited.
- **Proposed Policy Change:**
 - e. FSS Heads of Household in good standing may request funds for supportive services by providing a statement of need and supporting documentation.
 - i. The request shall not exceed \$2,500 per calendar year.



- ii. While the standard protocol remains one request per year, additional requests may be approved at the discretion of Opportunity Home, provided the total annual cap is not exceeded.



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 FY2026 to FY2031. In addition to updating the five-year plan every year, the Organization may also 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 costs 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 (LIHTC) 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 acquisition 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 \$48 million in capital repairs to extend the useful life at thirty (30) properties and approximately 2,983 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 (FY2027 - FY2031).

Fiscal Year (FY) ¹ Capital Fund Grant Year (CFP)	Property	Units Preserved ²	Description	Planned Investment (\$)
FY 2026-27 CFP24-26 (Current)	PHA Wide		Foundation, Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,250,000
	Alazan	13	Mold Renovations / Bring Units Online	750,000
	Blanco	100	Housing Hazard Improvements	1,000,000
	Cassiano	499	Foundation and Roofing	1,830,000
	Cheryl West	82	Foundation Repairs	70,000
	Escondida	20	Elevator Modernization	368,000
	Jewett	75	Property and Elevator Modernization	2,948,114
	Lincoln Heights	338	Stairwell Structural Repairs	500,000
	Marie McGuire	63	Elevator Modernization	470,000
	Matt Garcia	55	Housing Hazards Improvements	1,000,000
	Morris Beldon	35	PNA Substantial Renovation	2,856,781

¹ Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2027 begins on July 1, 2026 and ends on June 30, 2027. Capital grants are awarded to Opportunity Home SA every year. Opportunity Home SA then allocates funds based on capital needs.

² Number of housing units preserved is defined as the number of housing units impacted by contract execution of funds that can include capital grants, MTW funds, 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.

³ Funding sources may include dollars beyond Capital grants and MTW funds.



	Springview	173	Drainage Repairs	850,000
	TL Shaley	66	Foundation Repairs	80,000
	Villa Hermosa	66	Housing Hazard Improvements, HVAC	2,000,000
	William Sinkin	50	Foundation Repairs	60,000
		1,635		16,032,895
FY 2027-28				
CFP26-27	PHA Wide		Foundation, Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,250,000
	Blanco	100	Elevator Modernization	740,000
	Francis Furey	66	Substantial Renovation	2,140,000
	Linda Lou	10	Substantial Renovation	450,000
	WC White	75	Elevator Modernization	340,000
	William Sinkin	50	Substantial Renovation	1,000,000
		301		5,920,000
FY 2028-29				
CFP27-28	PHA Wide		Foundation, Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,250,000
	HB Gonzalez	51	Elevator Modernization	420,000
	Lila Cockrell	70	Exterior Repairs	2,463,114
	Mirasol	174	Roof Replacement	1,200,000
	Pin Oak I	50	Elevator Modernization	500,000
		345		5,833,114
FY 2029-30				
CFP28-29	PHA Wide		Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,000,000
	Highview	68	Renovation	4,000,000
	Midway	20	Roofing and Painting	372,000
	San Pedro Arms	16	Elevator Modernization	258,000
		104		5,630,000
FY 2030-31				
CFP29-30	PHA Wide		Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,000,000
	Lila Cockrell	70	Elevator Modernization	553,000
	OP Schnabel	70	Elevator Modernization	553,000
	Pin Oak II	22	Roofing and Painting	1,800,000
	South San	30	Renovations	666,103
		192		4,572,103
FY 2031-32				
CFP30-31	PHA Wide	26	Electrical, HVAC, Plumbing, and Roof Repairs as needed	1,000,000
	Cross Creek	66	Roofing and Painting	2,000,000
	Fair Ave	216	Interior Repairs	2,000,000
	Tarry Towne	98	Renovations	4,800,588
		406		9,800,588



GRAND TOTAL	2,983	47,788,700

1. B. Affordable Housing Communities Five-Year Capital Improvement Plan

In the coming years, the Organization plans to invest approximately \$34 million in capital repairs to extend the useful life of seventeen (17) properties in the Affordable Housing Communities portfolio. 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 table below outlines current property-specific preservation plans.

Fiscal Year⁴	Property	Description	Planned Investment (\$)⁵
2026-2027	The Ravello	Replacement or repair of security fencing, fence repainting, exterior walls, doors on fire riser, metal balcony railings, flooring, unit faucets and sinks, appliances, hot water heaters, A/C units, pool equipment, elevator renovation, parking lot restripe	4,911,300
	Midcrowne Senior	Replacement or repair of exterior trim, security fencing, roof, exterior lighting, gutters and leaders, carport, balcony railings, interior flooring, unit faucets and sinks, appliances, hot water heaters, A/C units, fans in corridors, elevator renovation, parking lot striping	4,772,072
	Towering Oaks	Siding replacement, vapor barrier, framing	850,000
	Dietrich Road	Replacement or repair of roofs, decking, soffits, trim, patios, siding, and windows	650,000
	Pecan Hill	Replacement or repair of roofs, decking, soffits, trim, and parking lots	1,700,000
	Sunshine Plaza	Replacement of parking lot, flooring, roofs, elevators, and railings	2,100,000
	Woodhill	Foundation repair, single building demolition, and replacement or repair of parking lots, siding, windows, and sliding glass doors	3,996,436
	Cottage Creek II	Rebuild building 15	2,000,000

⁴ Opportunity Home SA fiscal years run from July 1 to June 30th. For example, FY2027 begins on July 1, 2026 and ends on June 30, 2027.

⁵ 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.



	Science Park	Complete roofing repair and exterior painting for the entire complex	700,000
	O'Connor	Exterior painting for the entire complex	200,000
	Burning Tree	Repair of asphalt/parking lot, repair/paint of hand rail, and repair of balcony	500,000
	Monterrey Park	Asphalt/parking, handrails, and stairway repairs	250,000
	Reagan West	Replacement or repair of roofs, decking, soffits, trim, and parking lots	170,000
	Courtland Heights	Replace the collapsed French drain and the damaged retaining wall	350,000
	Villa de San Alfonso	Replacement or repair of trim, gates, and parking lots	75,000
	Hemisview	Capital rehabilitation	5,000,000
		TOTAL	\$28,224,808
2027-2028	Cottage Creek II	Rebuild building 15	2,000,000
	Converse Ranch I	Replacement of retaining wall and French drains	300,000
	Bella Claire	Replacement or repair of parking lots, fencing, signage, and A/C units	460,000
	Villa de Valencia	Replacement or repair of parking lots, gutters, retaining walls, gates, fences, and railings	300,000
		TOTAL	\$3,060,000
2028-2029	Crown Meadows	Replacement or repair of roofs, exterior paint, pool, and parking lots	650,000
	Castle Point	Replacement or repair of parking lots, pool resurface, retaining wall, tennis court, lights, fencing, and basketball court rehab	500,000
	Alhambra	Replacement or repair of elevators and light fixtures throughout the property	700,000
	Refugio Place	Replacement or repair of A/C units, drywall, entry doors, fencing, and parking lots	1,600,000
		TOTAL	\$3,450,000
2029-2030	Woodhill	Replacement or repair of playground equipment	75,000
		TOTAL	\$75,000
2030-2031		<i>Not yet determined</i>	
		TOTAL	TBD
Grand Total			\$34,809,808

2. Housing Expansion | New Housing Development Plans

2. A. New Housing Development Plans



Opportunity Home's mission is centered around bringing housing solutions to the residents of San Antonio. Opportunity Home is ensuring affordable housing options are available to any resident who cannot afford to rent 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 here:

<https://homesa.org/business/innovation/developments/>

2.A.1. New Construction Completed

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

AMI LEVEL															
Project Name	Dist rict	Developer	Financing	Total Development Cost (\$)	Total Units	PH/ PBV	PBRA	30 %	40%	50%	60%	70%	80%	Mark et	
Bristol at Somerset	D4	Louis Poppoon Development Consulting, LTD	4% Tax Credit & Bonds	\$63,331,807	348	0	0	0	0	0	348	0	0	0	
Vista at Reed	D6	Atlantic Pacific Companies	9% Tax Credits	\$22,000,248	56	0	0	4	0	13	36	0	0	1	
Snowden Road	D7	Opportunity Home San Antonio	9% Tax Credits	\$33,180,953	135	0	0	14	0	54	67	0	0	0	
Palo Alto	D4	Pathway MF, LLC	4% Tax Credit/Bonds/HUD 221(d)(4)	\$71,503,356	336	0	0	16	16	32	244	28	0	0	
Vista at Silver Oaks	D9	Atlantic Pacific Companies	9% Tax Credits	\$28,147,350	76	0	0	8	0	22	46	0	0	0	
Potranco	D4	LYND	Conventio nal Loan	\$67,914,812	360	0	0	0	0	0	36	0	144	180	
Josephine	D1	LYND	Conventio nal Loan	\$75,058,518	260	0	0	0	0	0	26	0	104	130	
Total				\$361,137,044	1571	0	0	42	16	121	803	28	248	311	

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

2.A.2. Under Construction



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

						AMI LEVEL							
Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units								
						PH/PBV	30%	40%	50%	60%	70%	80%	Market
Westside Reinvestment Initiative (WRI)	D5	Opportunity Home San Antonio	Hope VI/Sale Proceeds/ CoSA HOME Funds	\$4,775,795	25	0	0	0	0	5	0	20	0
Riverbreeze	D4	Kittle Properties	4% Tax Credit & Bonds	\$71,613,997	264	0	27	0	0	158	79	0	0
Emberstone Apartments	D4	Kittle Properties	4% Tax Credit & Bonds	\$58,007,611	247	0	25	0	0	222	0	0	0
Central at Commerce	D2	Union Development LLC	4% Tax Credit & Bonds	\$82,028,116	279	0	42	0	31	67	139	0	0
Total				\$216,425,519	815	0	94	0	31	452	218	20	0

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.i Board Final Approval

Opportunity Home has no new projects under this category.

2.A.3.ii Board Approval for Inducement

Project Name	District	Developer	Financing	Total Development Cost (\$)	Total Units	AMI LEVEL								Market
						PBRA	PH/PBV	30%	40%	50%	60%	70%	80%	
Canyon Golf Apartments	D9	Fulcrum Development	HUD 221(d)(4)	\$64,429,742	264	0	0	0	0	0	26	0	106	132
La Ventana	D6	Marcus Build	PFC	\$57,988,449	272	0	0	0	0	0	27	0	109	136
Lakeside Lofts	D2	The NRP Group	4% Tax Credit & Bonds	\$90,844,733	336	0	0	34	0	0	207	95	0	0



Overlook	D9	Fulcrum Development & LYND	HUD 221(d)(4)	\$79,125,364	360	0	0	0	0	0	36	0	144	180
Summit at Crownridge	D8	Journeyman Group	HUD 221(d)(4)	\$62,945,003	299	0	0	0	0	0	30	0	120	149
Victoria Commons - North/South Pond	D1	Catellus Development Corporation	Essential Functions Bond	\$96,305,043	397	0	0	10	10	10	41	0	131	195
Creekside at Lookout	D10	Athena Domain Inc	PFC	\$49,235,308	232	0	0	0	0	0	24	0	93	115
Rio Crossing	D3	GDA Partners	4% Tax Credit & Bonds	\$75,962,942	288	0	0	0	0	0	288	0	0	0
Rio Landing	D4	GDA Partners	4% Tax Credit & Bonds	\$75,468,271	288	0	0	0	0	0	288	0	0	0
Homestead	D4	TBD	4% Tax Credit & Bonds	\$91,731,632	324	0	0	0	0	108	108	108	0	0
Brickstone	D4	Kittle Properties	4% Tax Credit & Bonds	\$66,019,066	290	0	0	29	0	0	261	0	0	0
Aspire at MLK	D2	The NRP Group	4% Tax Credit & Bonds	\$78,321,856	300	0	0	30	0	0	186	84	0	0
NHH Culebra	D6	New Hope Housing	9% Tax Credits	\$28,600,000	80	0	0	12	0	32	36	0	0	0
Durrington Ridge	D9	Culver Investment Partners & Ascendant Capital Partners	PFC	\$81,413,401	398	0	0	0	0	10	39	0	150	199
Nova	D8	Culver Investment Partners & Ascendant Capital Partners	PFC	\$61,224,897	412	0	0	0	0	11	41	0	154	206



Total	\$1,059,615,707	4540	0	0	115	10	171	1,638	287	1,007	1,312

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. RFP’s will be issued in 2026 for Terry Towne, Springview, HB Gonzales, and Homestead (The Palms at Medina Base).

Project Name	District	Developer	Financing	Total Development Cost (\$)	Units
HB Gonzales	D7	TBD	TBD	TBD	TBD
Springview Convent	D2	TBD	TBD	TBD	TBD
Terry Towne	D1	TBD	TBD	TBD	98
Homestead AKA The Palms at Medina Base	D4	TBD	TBD	TBD	TBD
Marie McGuire	D1	TBD	TBD	TBD	63
Villa Hermosa	D1	TBD	TBD	TBD	66
Total				TBD	

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

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) 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 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 1,610 units, which includes 304 of public housing / project-based voucher units, 1,240 affordable units (under 80% AMI) that will be MTW local non-traditional eligible units, and 66 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%	
Hemisview Village	D1	4% Tax Credits & Bonds	Refinance / Acquisition 2026	245	49	0	0	12	184	0	0	0
Sutton Oaks I	D2	9% Tax Credit	Refinance / Acquisition 2026	194	49	0	0	28	109	0	0	8
2026 Refinance / Acquisition Total				439	98	0	0	40	293	0	0	0
Artisan at Mission Creek	D4	4% Tax Credits & Bonds	TBD	252	0	0	0	0	252	0	0	0
Mirabella Senior	D7	4% Tax Credits & Bonds	TBD	172	0	1	0	23	148	0	0	0
The Park at Sutton Oaks	D2	9% Tax Credit	TBD	208	49	0	0	25	88	0	0	46
San Juan Square I	D5	9% Tax Credit	TBD	143	46	0	0	0	91	0	0	6
San Juan Square II	D5	9% Tax Credit	TBD	144	48	0	0	0	90	0	0	6
The Gardens at San Juan Square	D5	4% Tax Credits & Bonds	TBD	252	63	0	0	0	189	0	0	0
2027 Other Assets Total				1171	206	1	0	48	858	0	0	58
Grand Total				1,610	304	1	0	88	1,151	0	0	66

3. B. Other Acquisitions

Over the next fiscal year, Opportunity Home will continuously analyze new potential projects with the goal of acquiring two properties in an effort to expand affordability across the city.

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 - Convent, Building B, Building C, Schoolhouse	115807	651 S MEL WAITERS WAY
Vacant parcels south of Springview	115808	903 HEDGES ST
	115809	909 HEDGES ST
	115810	913 HEDGES ST
	115811	915 HEDGES ST
	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
Springview (Former Administration Building For East Terrace) (Sheriff's Annex)	115790	202 Garcia St
WRI Parcels (Homeownership)	Multiple	Various parcels on VILLA LINDA VILLA FLORES VILLA PLACER
Vacant parcels near Victoria Commons	108009	331 LAVACA ST
	108019	LABOR
Costa Mirada	480339	9323 SOMERSET RD
Additional Properties	115581	2830 E COMMERCE ST
	115582	2407 EZELL
	115583	2411 EZELL
	115584	2415 EZELL
	115585	2415 EZELL
	115588	2902 E COMMERCE ST
	115589	2906 E COMMERCE ST
	115590	2910 E COMMERCE ST
	115595, 115597	2603 EZELL
	115600	2607 EZELL
	115602, 115603	2944 E COMMERCE ST
	124452	1706 CINCINNATI AVE
	112725	2738 DIGNOWITY AVE
	141735	509 SALTILLO ST
	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
	115258	1528 PASO HONDO



	115259	1528 PASO HONDO
69 Scattered Sites		
	416159	2227 Ramona
	602875	14054 Greenjay
	597018	13919 Brays Forest
	602625	14015 Greenjay
	608887	14231 Swallow Dr
	602723	4934 Grey Hawk
	634051	4957 Champlain
	634048	4969 Champlain
	608889	5134 Anacacho
	519040	9502 Nona Kay Dr
	536813	6503 Shady Bluff
	542286	9438 Yett Avenue
	695152	2931 Wishing Lake
	695156	2947 Wishing Lake
	695674	3511 Bottomless Lake
	695685	3511 Lake Tahoe
	695647	3542 Lake Tahoe
	695768	5811 Lakefront
	564611	9506 Showboat Dock
	564606	9519 Tarleton
	512634	4906 Chedder Dr
	675689	5907 Kissing Oak
	677381	15011 Eagle Run
	610714	5730 Champions Hill
	652143	13083 Feather Ridge
	646370	13236 Lark Place
	620059	14734 Hillside View
	549621	4706 Guadalajara
	630876	5735 Champions Hill
	551688	3706 Zenia Circle
	708237	4318 Timberhill
	625431	6011 Wampum
	646386	13215 Larkgate
	633317	10418 Country Horn
	633193	10442 Country Bluff
	629123	11206 Prairie Spring
	632507	12511 Valle De Zavala
	195050	10230 Athens Field
	195067	10210 Barron Field
	594461	1002 Harbour Grey
	194828	10203 Canton Field
	194748	10203 Sunrise Field
	597959	1022 Fillmore
	194984	2819 Cherry Field
	659739	12038 Stoney Bridge
	659305	12202 Ridge Corner
	671134	15402 Walnut Creek
	675875	16602 Boulder Ridge
	659527	3511 Stoney Bluff
	674702	4406 Knollvalley
	616215	5114 Stockman



628960	7130 Spring Grove
648688	7570 Bluestone
716133	9354 Valley Gate
705044	7322 Lansbury Drive
710274	7771 Alverstone Way
718858	5943 Hidden Dale
707170	10145 Galesburg
686736	2920 Wood Circle
711911	5518 Ridge Run
704951	7239 Hardesty
705053	7323 Lansbury Drive
707283	7426 Alverstone Way
707315	7446 Rimhurst
713231	9211 Ridge Wilde
713885	9215 Valley Haven
713897	9535 Valley Dale
696475	2318 Frontier Trail Dr
687556	7534 Meadow Lawn

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	Miller Child
116082	102 S MEL WAITERS WAY	Development Center /
		Springview
115586	E COMMERCE ST	Springview
116625	916 HEDGES ST	
		Adjacent to TPSO and
112746	1011 LOCKE ST	Sutton Oaks I
151169	4063 BREMEN ST	Vacant parcel
512161	E COMMERCE ST	
551676	1822 ARBOLEDA ST	Eastside Lots - possible
580339	7822 GLIDER AVE	home ownership
114103	1418 HAYS ST	



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 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 Use/License	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
	Vacant Lot	550 Brooklyn St	San Antonio River Authority
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

The Organization has adopted the following definition to measure the number of households transitioned to self-sufficiency;

- A PH household that is paying a flat rent for at least six (6) months or an HCV household utilizing a zero (0) HAP voucher for at least six (6) months.

This definition allows the Organization to track households that have moved to economic self-sufficiency -- specifically, a household's ability to pay market or near market-rate rent. Over the last ten (10) years of tracking, the Organization has documented an average of fifty (50) households per year that meet this criteria and continues the work to increase the number of households achieving this level of economic self-sufficiency.

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.



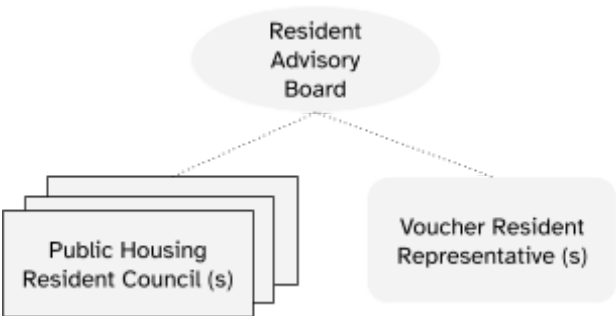
Appendix H | Resident Advisory Board

Currently, the Organization consults with residents for input on varying programs and processes in various formats throughout the year. In addition, the Organization underwent a new strategic planning process in FY2025 and through the first half of FY2026 to begin implementation during the second half of FY2026.

Opportunity Home formalized a Resident Advisory Board during FY2026 to participate in the annual MTW planning process as well as the ongoing strategic planning process on a consistent basis. Residents went through a self-nomination application, and a selection panel, made up of Opportunity Home staff, scored applications on a rubric to determine appointments. The Resident Advisory Board is organized and maintained by the Community Development Initiatives department and supported by the Strategy, Data, and Innovation department. The RAB brings together existing Resident Council members and voucher representatives to participate in and have a meaningful voice in the creation of the annual MTW plan and ongoing strategic initiatives.

Structure

Public Housing Resident Council(s): a duly elected council made up of residents from one or more properties that follow all HUD rules and requirements. Council members are elected and must follow HUD rules on tenant participation. The councils are supported by the Community Development Initiatives department. The Organization, in consultation with existing Resident Councils, may pursue a jurisdiction-wide resident council, which may be appointed to participate in annual resident advisory board meetings.



Voucher Resident Representative(s): appointed voucher participants that reflect and represent the diversity of all voucher residents - including voucher residents residing at properties operated and/or managed by Opportunity Home San Antonio. Appointments are made by Opportunity Home either through voucher holders volunteering and/or direct outreach by the Organization.

Resident Advisory Board: a group made up of public housing resident council members (or a future jurisdiction-wide resident council) and housing choice voucher resident representatives who participate in Opportunity Home’s strategic planning and annual MTW planning processes.



Appendix I | Rental Assistance Demonstration (RAD) & Section 18 Repositioning

Opportunity Home San Antonio intends to begin submitting applications to participate in RAD, Section 18 Demolition/Disposition, or a combination of both. As a result, Opportunity Home plans to begin submitting applications for sites once prioritization is set based on need and recommendations from external contractor consultation. Specific policy language surrounding this transition will be outlined in the Administrative Plan governing the Housing Choice Voucher program. Additionally, Opportunity Home San Antonio certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing PHAs with access to private sources of capital to repair and preserve their affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that Opportunity Home may also borrow funds to address its capital needs. Opportunity Home may also apply for low-income tax credits, tax-exempt bonds, and other local funds, which, combined with Organization-held funds, will address the capital needs. Listed below are the properties Opportunity Home plans to begin converting in FY27.

Development 1:

Name of Development:	PIC Development ID:	Conversion Type:	Transfer of Assistance:
Tarry Towne	AMP#TX006000013	RAD / Section 18 Blend	No
Total Units:	Pre-RAD Unit Type:	Post-RAD Unit Type:	Capital Fund Allocation of Development:
98	Elderly/Disabled	Elderly/Disabled	TBD
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Unit Configuration Changes
Studio/Efficiency	0	TBD	N/A
1 Bedroom	68	TBD	N/A
2 Bedroom	30	TBD	N/A
3 Bedroom	0	TBD	N/A



4+ Bedroom	0	TBD	N/A

Development 2:

Name of Development: Villa Hermosa	PIC Development ID: AMP#TX006000010	Conversion Type: RAD / Section 18 Blend	Transfer of Assistance: No
Total Units: 66	Pre-RAD Unit Type: Elderly/Disabled	Post-RAD Unit Type: Elderly/Disabled	Capital Fund Allocation of Development: TBD
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Unit Configuration Changes
Studio/Efficiency	41	TBD	N/A
1 Bedroom	20	TBD	N/A
2 Bedroom	5	TBD	N/A
3 Bedroom	0	TBD	N/A
4+ Bedroom	0	TBD	N/A

Development 3:

Name of Development: Westway	PIC Development ID: AMP#TX006000026	Conversion Type: RAD / Section 18 Blend	Transfer of Assistance: No
Total Units: 152	Pre-RAD Unit Type: Family	Post-RAD Unit Type: Family	Capital Fund Allocation of Development: TBD
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Unit Configuration Changes
Studio/Efficiency	0	TBD	N/A
1 Bedroom	22	TBD	N/A



2 Bedroom	41	TBD	N/A
3 Bedroom	63	TBD	N/A
4+ Bedroom	26	TBD	N/A

Development 4:

Name of Development: Lofts at Marie McGuire	PIC Development ID: AMP#TX006000010	Conversion Type: RAD / Section 18 Blend	Transfer of Assistance: No
Total Units: 63	Pre-RAD Unit Type: Elderly/Disabled	Post-RAD Unit Type: Elderly/Disabled	Capital Fund Allocation of Development: TBD
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Unit Configuration Changes
Studio/Efficiency	19	TBD	N/A
1 Bedroom	38	TBD	N/A
2 Bedroom	6	TBD	N/A
3 Bedroom	0	TBD	N/A
4+ Bedroom	0	TBD	N/A

Over time, the Organization expects to transition all Public Housing units through RAD and Section 18 blend strategies over a slowly paced timeline due to the number of units that the Organization manages. Staff is still determining the scope of work for each of the projects. Consequently, Opportunity Home does not yet have a relocation plan available with this amendment. A relocation plan will be developed as soon as possible and will adhere to all HUD requirements.

All conversions to Project-Based Vouchers will follow policies and procedures noted in the Administrative Plan, Appendix C, of this MTW Plan.



The Organization may also blend conversions to include Project-Based Rental Assistance units. The final breakdown of units will be determined at the time of application based on financing requirements. All HUD requirements and procedures will be adhered to.





Proposed FY 2026-2027 Moving to Work (MTW) Plan



Move to Work Designation

Overview

Allows Opportunity Home to deliver our mission, vision and values in ways that are different than other PHAs

MTW Toolbox

- 1 Regulatory Waivers
- 2 Funding Fungibility

Funding Fungibility

MTW SOURCES OF FUNDS

Dept of Housing and Urban Development

PH Operating Subsidy

HCV Block Grant funding

PH CFP (including DDTF)
Grants

PH Rental & Other Income
(rents + other charges)

Fungibility
via Budget
Process

MTW USES OF FUNDS

PH Operating Expenses

HCV Operating Expenses

PH Capital Improvements

MTW Flexible Uses

Statutory Objectives



Cost Efficiency/ Effectiveness

Reduce cost and achieve greater cost effectiveness in Federal expenditures.



Housing Choice

Increase housing choices for low income families.



Self-Sufficiency

Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

MTW Timeline

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

Planning

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

Public Comment

- Feb 18: Draft MTW Plan posted for 30-day public comment period
- Various forms of public outreach
- March 20: Public comment period closes
- April: Consideration and appropriate action by Board of Commissioners and submission to HUD

HUD Approval & Implementation

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

Public Comment Period

MTW Public Comment

- Feb. 18 – March 20, 2026
- Email comments to: mtw@homesa.org
- Mail comments to:
ATTN: Strategy, Data & Innovation
818 S. Flores St.
San Antonio, TX 78204

Outreach Plan

- **6 PH Resident Consultations**
 - a. Lila Cockrell
 - b. Villa Veramendi
 - c. Cassiano
 - d. Madonna
 - e. OP Schnabel
 - f. Fair Ave
- **1 HCV Resident Consultation**
 - a. Central Office
- **1 Staff Consultation**
- **Closed Session - RAB**
- **Video Recording Online**
- **Marketing**
 - a. Staff Weekly
 - b. Resident Newsletter
 - c. Social Media

Proposed New Activities

FY 26-27 Proposed

The Organization is proposing
1 new activity for HUD
approval this plan year.

FY2026-1

Elimination of Negative Rent

- Currently, if a resident's UA exceeds their TTP, this results in a "negative rent" and a reimbursement check is issued to the household
- Under this activity, all non-elderly / non-disabled households that have negative rent would no longer receive the reimbursement
 - The UA calculation and disbursement would remain unchanged
- Elderly/disabled households exempt
- Once approved by HUD, there is not yet an exact timeline for launch

Changes to Activities

Closing Out

The Organization will sunset 1 activity this FY

**FY2024-1
Elimination of Earned Income
Disregard**

Development

Repositioning / Redevelopment

The Organization may begin the process of repositioning PH sites in FY27.

Breakdown

Tarry Towne

Villa Hermosa

Westway

Lofts at Marie McGuire

Asset Management

Preservation

The Organization anticipates preserving 1,365 units across 8 properties in the coming FY

- Sutton Oaks I
- Artisan at Mission Creek
- Mirabella Senior
- The Park at Sutton Oaks
- San Juan Square I
- San Juan Square II
- The Gardens at San Juan Square

Public Housing: Over next 5 years, plan to invest over **\$48 million** in capital repairs to extend the useful life at 30 properties and approximately **2,983 units**.

Proposed FSS Action Plan Changes

Family Self-Sufficiency Program

7 Revisions Proposed

The primary objectives of these proposed revisions are to:

- Align policies with current rent simplification rules and HUD regulations
- Enhance consistency in the administration of escrow accounts and supportive services
- Modernize program reporting by ensuring demographic data reflects the current participant population

FY 26-27 ACOP & Admin Plan

Public Housing and Housing Voucher Services

Overview

The proposed policy revisions are aimed at accomplishing the following objectives:

- Accurately reflect federal regulations, state regulations and local law
- Improve problematic policies
- Eliminate redundancies and contradictions
- Reduce unrequired resource expenditures
- Accommodate the needs of residents across Opportunity Home's multiple Public Housing communities
- Accommodate the needs of Housing Choice Voucher participants

HUD Regulations

Code of Federal Regulations

- General program regulations

HUD Public and Indian Housing (PIH) Notices

- Regulatory clarification, guidance and recommendations
- New/updated regulations



Opportunity Home Policy

Admissions & Continued Occupancy Policy and Administrative Plan

- The manner in which Opportunity Home will administer the HCV and Public Housing programs
- Must comply with HUD regulations

HUD-defined program rules that Opportunity Home must follow

Generally, two types:

MANDATORY

- “The PHA must, must not, or may”

DISCRETIONARY

- “The PHA may...”= **Vague, must be defined**

Opportunity Home defined program rules that we must follow

- Must comply with HUD regulations
- Must be clearly defined and unambiguous

Overview

ACOP & Admin Plan Example

3.1.D HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Reference to Code of Federal Regulations

HUD
Regulation

(1) *Head of household* means the adult member of the family who is considered the head for purposes of determining income eligibility and rent.

Opportunity
Home Policy

(2) Minors who are emancipated under state law may be recognized as the head of household.

Overview

Policy revisions are indicated by **red text**.

- ~~Strikethrough~~ = omitted text
- Underline = added text

The Admin Plan, ACOP, and Lease Revision Summaries are available at homesa.org/moving-to-work

Proposed Admin Plan Revisions

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Centralized Project Based Vouchers (PBV) Waiting List

Changes to section 18.6.C may impact applicants.

The updated language would allow Opportunity Home to operate one centralized waiting list, with subparts, for the PBV program. The centralized waiting list will address the administrative burden of maintaining multiple waiting lists.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Request for Tenancy Approval Submission

Changes to section 9.1.B may impact participants and owners.

The revised language permits Opportunity Home to set the process for submitting the Request for Tenancy Approval (RTA). The organization accepts electronic submissions of RTAs and any necessary corrections.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Project Based Vouchers Rent Limits

Changes to section 18.8.B may impact participants.

Language has been revised to note that Opportunity Home will apply the higher of the approved SAFMRs or MAFMRs to establish rent amounts for the PBV program.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Veterans Affairs Supportive Housing (VASH) Program

Changes to section 19.6.F may impact VASH participants.

The language has been updated to comply with the VASH income eligibility updates established by HUD through the Federal Register notice titled "Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-Veterans Affairs Supportive Housing Program." Revisions include alternative requirements related to income and program minimum rent.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Owner Responsibilities

Changes to section 13.1.C may impact program landlords.

The policy changes in this section are intended to streamline documentation requirements for new and existing owners participating in the Housing Choice Voucher (HCV) program. Opportunity Home will not execute Housing Assistance Payment (HAP) contracts until all required documentation, including HUD settlement statements, IRS forms, and EIN/SSN verification, has been provided and verified.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

College and University Homeless Assistance Program (CHAP)

Changes to section 19.2 may impact referred students/participants.

Section 19.2 has been updated to expand the College Housing Assistance Program (CHAP) by allowing referrals from all Alamo Community Colleges and adding the University of Texas at San Antonio (UTSA) and Texas A&M University–San Antonio (TAMUSA) as participating institutions. Additionally, the policy now extends the period of assistance to one year after graduation.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Minimum Rent for MTW Programs

Changes to section 6.3.A may impact participants.

This change to Section 6.3.A(1)(e) clarifies the minimum rent for Moving to Work (MTW) voucher programs administered by Opportunity Home, and aligns with the minimum rent for the standard HCV program.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Debts Owed to Opportunity Home

Changes to section 3.3.D may affect applicants.

The language in Section 3.3.D(4) has been revised to allow Opportunity Home to deny admission to the voucher programs when applicants owe rent or other amounts to Opportunity Home.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Non-Elderly Disabled (NED) Vouchers

Section 19.9 outlines the policy for administering the Non-Elderly Disabled (NED) Voucher program. NED vouchers serve families with a head of household, co-head of household, or spouse who is a non-elderly person with a disability.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Utility Reimbursements

Changes to section 6.3.A may affect participants.

Section 6.3.A(5)(e) will be updated to align with the proposed MTW activity “FY2026-1: Elimination of Negative Rent,” which would eliminate utility reimbursements for non-elderly and non-disabled families as defined by HUD regulations. Implementation of this activity will occur at a later date once all necessary programming updates are complete.

FY26-27 Administrative Plan Revisions

Proposed Admin Plan Revisions

Project Based Voucher under the Rental Assistance Demonstration (RAD PBV Program)

Chapter 21 describes HUD regulations and Opportunity Home policies related to the Project Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program.

Proposed ACOP Revisions

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Other Permitted Reasons for Denial of Admission

This change may affect applicants.

The language in section 3.3.D(4)(d)(ii) will be revised to prohibit applicants with outstanding debts to Opportunity Home from entering into repayment agreements at the time of admission. All balances related to any Opportunity Home housing program must be paid in full before an applicant can be admitted to Public Housing.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Eligibility for Continued Occupancy

This change will affect residents.

This change will affect residents. Section 12.4.G(c) will be updated to require that any Public Housing resident requesting a transfer to a different Public Housing community must satisfy all outstanding debts owed to Opportunity Home in full prior to being determined eligible for the transfer. Residents will not be permitted to enter into a Repayment Agreement to meet this eligibility requirement.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Termination due to Breach of Repayment Agreement

This change will affect residents.

This change will affect residents. The language in section 13.3.C(2)(vii) will be updated to align with HUD regulations (PIH 2018-18), which require PHAs terminate assistance for breach of a repayment agreement.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Family Debts to Opportunity Home

These changes may affect residents.

These changes may affect residents. Section 16.3.B(1-3),(e)(i)(C),(f)(1),(2)(i), and (v)(B) have been updated to state that residents will not be eligible for a Repayment Agreement for any debts owed that are not the result of under-reported or unreported income. Existing repayment agreements for other debt types will remain in effect until completed or breached.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Alternatives to Termination of Tenancy

This change may affect residents.

This change may affect residents. Section 13.3.D(2)(a) will be updated to reflect the proposed policy update, which is to permit repayment agreements only in instances of unreported or under-reported income. This means a Repayment Agreement will serve as an alternative to termination exclusively for qualifying cases of unreported or under-reported income.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Interim Reexaminations due to Increases in Income

This change may affect residents.

This change may affect residents. Sections 9.3.C(3)(b)(i)(A)&(B) will be updated to require residents to report increases in monthly income of \$200 or more within 10 business days after the change takes effect.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Number of Unit Offers

This change may affect applicants.

This change may affect applicants. Section 5.2.B(1) will be updated to state that Opportunity Home will only extend one unit offer to eligible applicants drawn from the waiting list.

FY26-27 Admissions and Continued Occupancy Revisions

Proposed ACOP Revisions

Utility Reimbursements

This change may affect residents.

This change may affect residents. Section 6.3.A(1)&(5) will be updated to align with the proposed MTW activity “FY2026-1: Elimination of Negative Rent”, which would eliminate utility reimbursements for non-elderly and non-disabled families as defined by HUD regulations. Note that implementation of this policy will take place at a later date, once programming updates are completed.

Proposed Revisions to the Public Housing Lease

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Recording on Property

This change affects residents.

New language was added to PH Lease Part II section (IX)(dd) to protect the privacy and peaceful enjoyment of the premises by prohibiting recording residents or staff without their knowledge and consent. An exception is made only for documenting evidence of criminal activity for law enforcement as permitted by law.

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Doorbell Cameras

This change affects residents.

New language will be added to Lease Part II section (IX)(l) to allow residents to install doorbell cameras with prior written approval from Opportunity Home. The update also stipulates that residents must agree and sign an acknowledgement form if approved for a doorbell camera.

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Mini/Portable Washers and Dryers

This change affects residents.

New language was added to PH Lease Part II section (IX)(g) prohibiting the use of mini/portable washers and dryers. This measure ensures that electrical and plumbing systems are used only for their intended purposes and prevents unauthorized equipment from straining building infrastructure.

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Keys and Methods of Entry to the Premises

This change affects residents.

Lease Part II section (IX)(ee) was added to strengthen property security. This new provision mandates that residents maintain exclusive possession of all access devices and strictly prohibits the duplication or sharing of keys and fobs with non-residents. Additionally, it prohibits behaviors that compromise building security, such as propping doors or allowing unauthorized 'tailgating' into the premises.

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Opportunity Home Maintenance and Systems

This change affects residents.

New language is being added to section Lease Part II section (IX)(x) to prohibit the unauthorized tampering with, or adjustment of, any Opportunity Home systems and equipment. The language further requires that residents notify property staff of all maintenance issues via a formal work order and refrain from contacting or hiring any outside vendor for repairs without prior written approval from Opportunity Home. This update is intended to ensure that all repairs meet Opportunity Home's safety and quality standards.

FY26-27 Public Housing Lease Revisions

Proposed Lease Revisions

Solicitation

This change affects residents.

New language was added to Lease Part II section (IX)(cc) prohibiting the placement of any signs, flyers, or advertisements throughout the property and common areas without prior written approval. It further prohibits engaging in or allowing any unauthorized commercial solicitation, door-to-door sales, or the distribution of unapproved marketing materials; this includes a restriction on surveying other residents without management consent, unless such outreach is specifically protected by federal law for resident organizing (e.g., Resident Councils).

Next Steps

PUBLIC COMMENT PERIOD

- Feb. 18 – March 20, 2026
- Email comments to: mtw@homesa.org
- Mail comments to:
ATTN: Strategy, Data & Innovation
818 S. Flores St.
San Antonio, TX 78204
- View the entire plan draft:
homesa.org/moving-to-work

FEBRUARY

- Feb. 18: Comment period begins

MARCH

- Capture public comments
- March 4: Public hearing
- March 20: Comment period ends

APRIL

- April 1: Board approval of MTW Plan
- April 15: Submit MTW Plan to HUD

MAY - JUNE

- Work with MTW-HUD Office to address any issues/questions

JULY 1

- Implementation of MTW Plan

Questions + Feedback



Website

homesa.org/moving-to-work



Email

mtw@homesa.org



Mail

ATTN: Strategy, Data &
Innovation

818 S. Flores St.

San Antonio, TX 78204

Questions?

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026****MEMORANDUM**

To: Board of Commissioners

From: Michael Reyes, President and CEO

Presented by: Aaron Sladek, Senior Director of Finance and Accounting

RE: Update and discussion regarding the Quarterly Financial Performance Report for Opportunity Home San Antonio

Initial
MR

SUMMARY:**Financial Performance Highlights**

The Quarterly Financial Report for Opportunity Home San Antonio for the six months ended December 31, 2025, is attached. The Financial Performance Report includes condensed statements of revenue and expenses for each line of business. The report summarizes the lines of business into two categories: one for Opportunity Home's core activities—housing, management, and resident services (referred to as "Operations")—and another for Real Estate Services and Capital Funds (referred to as "Capital"). The results for the six months ended December 31, 2025, reflect a Surplus Before Non-Cash Items of \$34.6 million for Operations (\$33.9 million above budget) and a Surplus Before Non-Cash Items of \$3.9 million for Capital (\$0.5 million above budget). The \$34.6 million surplus was supported by MTW funding, which was allocated as follows: \$3.8 million for Public Housing operations and capital investments; \$27.4 million for the Amara acquisition; \$1.5 million for the Artisan at Creekside acquisition; \$1.0 million for Community Development Initiatives; and \$0.1 million as matching funds for the Midcrowne Housing Bond rehabilitation project.

Total Operating Revenue for the Operations segment came in \$2.7 million below budget, with mixed performance across revenue categories. Tenant Revenue was \$0.5 million below budget, primarily within the Public Housing portfolio, despite strong overall occupancy of 96.6%. Bad debt write-offs were approximately \$0.4 million above budget. Grant revenue exceeded budget by \$3.6 million, largely driven by \$1.4 million in additional Section 8 administrative fees resulting from HUD reconciliations and a higher CY 2025 proration rate. Project-based Section 8 HAP revenue in the Affordable Housing Communities ("AHC") portfolio was \$0.5 million above budget due to higher contract rents, while Public Housing operating subsidy exceeded budget by \$1.0 million, reflecting HUD's interim proration rate of 102.58% versus the budgeted 96.97%. Public Housing also recognized \$0.9 million in shortfall funding. Section 8 HAP Revenue was \$5.8 million below budget due to lower voucher utilization; however, this variance was fully offset by a corresponding reduction in HAP Expense.

Total Operating Expenses for the Operations segment came in \$10.3 million below budget. Salaries and Benefits were \$2.4 million under budget due to effective staffing cost management, while Other Expenses were \$2.2 million below budget, largely driven by lower technology, consulting, protective services, and insurance costs.

OPPORTUNITY HOME SAN ANTONIO**March 4, 2026**

Total Operating Revenue for the Capital segment was \$0.8 million above budget. Grant revenue exceeded the budget by \$2.2 million due to the timing of Capital Fund Grant soft costs. This was partially offset by Miscellaneous Revenue coming in \$1.4 million below budget, primarily from lower-than-anticipated developer and bond issuer fees.

Total Operating Expenses for the Capital segment were \$0.7 million below budget. Salaries and Benefits were \$0.2 million under budget, driven by lower staffing costs than anticipated. Other Expenses were \$0.5 million below budget, driven by a favorable \$0.9 million variance in consulting fees, partially offset by \$0.4 million in higher legal fees.

Total Assets and Deferred Outflows of Resources increased by \$37.0 million, or 6.0%. Current Assets rose by \$30.0 million, primarily due to assets held for sale related to the pending disposition of Rosemont at Highland Park and Costa Valencia, as well as changes associated with the discontinuation of Section 8 HAP prefunding, which shifted balances from prepaid expenses to restricted cash. Fixed Assets increased by \$64.4 million, largely driven by property acquisitions within the AHC portfolio and capitalized project costs, partially offset by asset reclassifications, demolition activity, and routine depreciation. These increases were partially offset by a \$57.8 million decrease in Other Non-Current Assets, primarily due to the establishment of a \$58.8 million allowance for doubtful accounts on notes receivable from certain tax credit partnerships following an evaluation of projected cash flows.

Total Liabilities and Deferred Inflows of Resources increased by \$49.1 million, or 21.9%. Current Liabilities rose by \$19.7 million, primarily due to the reclassification of long-term debt for Rosemont at Highland Park and Costa Valencia to current status in anticipation of bond redemption upon their pending sale. Non-Current Liabilities increased by \$26.9 million, largely driven by new debt issued to finance the Amara acquisition, the Elan Gardens refinance, and debt assumed with the acquisition of Artisan at Creekside. These increases were partially offset by the reclassification of certain long-term debt to current liabilities and routine principal repayments.

Total Net Position decreased by \$12.1 million, or 3.10%, reflecting the combined impact of the asset and liability changes noted above.

Supplemental Information—Funding Environment

On February 3, 2026, President Trump signed the FY 2026 appropriations bill, which provides funding for HUD programs. For the Housing Choice Voucher program, Congress approved \$34.96 billion for Housing Assistance Payment renewals—an increase of \$2.81 billion (8.7%) over FY 2025. Administrative fees also increased by 2.3% to \$2.84 billion, or \$65.0 million more than last year. Project-Based Rental Assistance received \$18.54 billion, up \$2.05 billion (12.4%) from FY 2025. Public Housing funding is mixed. The Operating Fund was reduced by 14.4% to \$4.69 billion (a decrease of \$789.0 million). However, this reduction is partially offset by a \$312.0 million increase in the Operating Fund Shortfall Account, resulting in a net decrease of \$477.0 million. The Capital Fund remains level at \$3.2 billion, consistent with prior years.

PROPOSED ACTION:

None.

OPPORTUNITY HOME SAN ANTONIO

March 4, 2026

FINANCIAL IMPACT:

None.

STRATEGIC OUTCOMES:

Supports all strategic outcomes.

ATTACHMENTS:

Financial Performance Report
Cash and Investment Summary
Grants Report
Slides

Opportunity Home San Antonio
Financial Performance Report
Condensed Statement of Revenue and Expenses - Operations
(For the Six Months Ended 12/31/2025)
(Unaudited)

Account Description	Public Housing			Housing Voucher Services			Affordable Housing Communities		
	Actual	Budget	Variance	Actual	Budget	Variance	Actual	Budget	Variance
Operating Revenue									
Tenant Revenue	\$ 6,251,719	\$ 6,735,035	\$ (483,316)	\$ -	\$ -	\$ -	\$ 23,314,366	\$ 23,331,152	\$ (16,786)
Grants	17,376,458	15,486,907	1,889,551	8,308,620	6,947,628	1,360,992	2,922,159	2,335,114	587,045
HAP Revenue	-	-	-	63,643,928	69,513,482	(5,869,554)	38,827	-	38,827
Miscellaneous Revenue	45,548	67,173	(21,625)	50,938	35,250	15,688	111,112	102,880	8,232
Total Operating Revenue	\$ 23,673,725	\$ 22,289,115	\$ 1,384,610	\$ 72,003,486	\$ 76,496,360	\$ (4,492,874)	\$ 26,386,464	\$ 25,769,146	\$ 617,318
Operating Expenses									
Salaries and Benefits	\$ 7,505,410	\$ 8,415,665	\$ (910,255)	\$ 3,630,878	\$ 3,893,841	\$ (262,963)	\$ 5,287,854	\$ 5,744,052	\$ (456,198)
Ordinary Maintenance and Repairs	5,878,144	6,162,744	(284,600)	20,113	28,220	(8,107)	4,316,544	4,160,638	155,906
Utilities	3,346,237	3,183,564	162,672	-	-	-	2,735,706	2,501,575	234,131
Other Expenses	2,764,075	3,714,909	(950,834)	944,751	1,008,058	(63,307)	2,977,711	3,314,059	(336,348)
HAP Expense	-	-	-	63,643,928	69,512,481	(5,868,553)	-	-	-
Management Fees	3,092,356	3,215,368	(123,013)	1,868,907	1,897,569	(28,662)	1,759,558	1,998,193	(238,635)
Total Operating Expenses	\$ 22,586,221	\$ 24,692,250	\$ (2,106,029)	\$ 70,108,578	\$ 76,340,169	\$ (6,231,592)	\$ 17,077,372	\$ 17,718,516	\$ (641,145)
Net Operating Income	\$ 1,087,504	\$ (2,403,135)	\$ 3,490,639	\$ 1,894,909	\$ 156,191	\$ 1,738,717	\$ 9,309,093	\$ 8,050,630	\$ 1,258,463
Non-Operating Income (Expenses)									
Interest Expense	\$ (90,189)	\$ (88,619)	\$ (1,569)	\$ -	\$ (759)	\$ 759	\$ (3,978,527)	\$ (2,887,501)	\$ (1,091,026)
Interest Income	904,496	684,044	220,452	87,639	139,600	(51,961)	429,336	548,634	(119,298)
Other Income (Expenses)	(3,910,627)	(3,678,098)	(232,529)	(54,001)	(42,500)	(11,501)	(2,042,110)	(2,362,234)	320,123
Transfers	3,882,605	5,355,508	(1,472,903)	(31,784,442)	(4,788,983)	(26,995,459)	27,440,494	-	27,440,494
HUD-Held Fund Draws	-	-	-	31,784,442	4,788,982	26,995,460	-	-	-
Total Non-Operating Income (Expenses)	\$ 786,285	\$ 2,272,835	\$ (1,486,549)	\$ 33,638	\$ 96,340	\$ (62,702)	\$ 21,849,193	\$ (4,701,100)	\$ 26,550,293
Surplus (Deficit) Before Non-Cash Items	\$ 1,873,789	\$ (130,300)	\$ 2,004,090	\$ 1,928,547	\$ 252,531	\$ 1,676,016	\$ 31,158,286	\$ 3,349,529	\$ 27,808,756
Non-Cash Items									
Depreciation and Amortization	\$ (4,769,134)	\$ (4,329,149)	\$ (439,986)	\$ (19,328)	\$ (26,972)	\$ 7,645	\$ (4,663,352)	\$ (3,310,808)	\$ (1,352,544)
Non-Operating Income (Expense)	5,782,014	10,003,741	(4,221,727)	-	-	-	(5,110,412)	5,139,115	(10,249,526)
Total Non-Cash Items	\$ 1,012,880	\$ 5,674,592	\$ (4,661,712)	\$ (19,328)	\$ (26,972)	\$ 7,645	\$ (9,773,764)	\$ 1,828,307	\$ (11,602,071)
Change in Net Position	\$ 2,886,669	\$ 5,544,292	\$ (2,657,623)	\$ 1,909,219	\$ 225,559	\$ 1,683,660	\$ 21,384,522	\$ 5,177,836	\$ 16,206,686

Opportunity Home San Antonio
Financial Performance Report
Condensed Statement of Revenue and Expenses - Operations (continued)
(For the Six Months Ended 12/31/2025)
(Unaudited)

Account Description	Central Office			Community Development Initiatives			Total - Operations			Highlights Section
	Actual	Budget	Variance	Actual	Budget	Variance	Actual	Budget	Variance	
Operating Revenue										
Tenant Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 29,566,085	\$ 30,066,187	\$ (500,101)	I(a)(1)
Grants	-	-	-	850,479	1,067,661	(217,182)	28,879,134	25,314,516	3,564,618	I(a)(2)
HAP Revenue	-	-	-	-	-	-	63,682,755	69,513,482	(5,830,727)	I(a)(3)
Miscellaneous Revenue	1,041,848	929,250	112,598	139,005	200,000	(60,995)	776,590	661,103	115,486	
Total Operating Revenue	<u>\$ 1,041,848</u>	<u>\$ 929,250</u>	<u>\$ 112,598</u>	<u>\$ 989,484</u>	<u>\$ 1,267,661</u>	<u>\$ (278,177)</u>	<u>\$ 122,904,564</u>	<u>\$ 125,555,288</u>	<u>\$ (2,650,724)</u>	
Operating Expenses										
Salaries and Benefits	\$ 6,656,930	\$ 7,057,980	\$ (401,050)	\$ 1,338,538	\$ 1,683,061	\$ (344,524)	\$ 24,419,610	\$ 26,794,599	\$ (2,374,989)	I(b)(1)
Ordinary Maintenance and Repairs	131,076	201,900	(70,824)	814	5,879	(5,065)	10,346,690	10,559,381	(212,690)	
Utilities	76,865	107,250	(30,385)	-	-	-	6,158,808	5,792,389	366,419	
Other Expenses	1,036,486	1,555,548	(519,063)	427,759	743,080	(315,321)	7,457,003	9,618,781	(2,161,779)	I(b)(2)
HAP Expense	-	-	-	-	-	-	63,643,928	69,512,481	(5,868,553)	I(a)(3)
Management Fees	(7,361,596)	(7,694,512)	332,916	6,876	7,042	(166)	330,655	361,255	(30,600)	
Total Operating Expenses	<u>\$ 539,761</u>	<u>\$ 1,228,166</u>	<u>\$ (688,405)</u>	<u>\$ 1,773,987</u>	<u>\$ 2,439,063</u>	<u>\$ (665,077)</u>	<u>\$ 112,356,694</u>	<u>\$ 122,638,886</u>	<u>\$ (10,282,192)</u>	
Net Operating Income	<u>\$ 502,087</u>	<u>\$ (298,916)</u>	<u>\$ 801,003</u>	<u>\$ (784,503)</u>	<u>\$ (1,171,402)</u>	<u>\$ 386,900</u>	<u>\$ 10,547,870</u>	<u>\$ 2,916,402</u>	<u>\$ 7,631,468</u>	
Non-Operating Income (Expenses)										
Interest Expense	\$ -	\$ (1,458)	\$ 1,458	\$ -	\$ (420)	\$ 420	\$ (3,767,048)	\$ (2,803,139)	\$ (963,909)	I(c)(1)
Interest Income	87,494	92,571	(5,077)	14,229	16,770	(2,541)	1,309,197	1,313,502	(4,304)	
Other Income (Expenses)	(48,686)	(16,600)	(32,085)	(73)	-	(73)	(5,476,914)	(5,576,637)	99,723	
Transfers	16,600	-	16,600	824,128	1,134,607	(310,479)	174,924	-	174,924	
HUD-Held Fund Draws	-	-	-	-	-	-	31,784,442	4,788,982	26,995,460	I(c)(1)
Total Non-Operating Income (Expenses)	<u>\$ 55,409</u>	<u>\$ 74,513</u>	<u>\$ (19,104)</u>	<u>\$ 838,284</u>	<u>\$ 1,150,957</u>	<u>\$ (312,673)</u>	<u>\$ 24,024,600</u>	<u>\$ (2,277,293)</u>	<u>\$ 26,301,893</u>	
Surplus (Deficit) Before Non-Cash Items	<u>\$ 557,495</u>	<u>\$ (224,403)</u>	<u>\$ 781,898</u>	<u>\$ 53,781</u>	<u>\$ (20,445)</u>	<u>\$ 74,227</u>	<u>\$ 34,572,470</u>	<u>\$ 639,110</u>	<u>\$ 33,933,361</u>	
Non-Cash Items										
Depreciation and Amortization	\$ (93,409)	\$ (78,650)	\$ (14,759)	\$ (6,067)	\$ (12,145)	\$ 6,078	\$ (9,551,290)	\$ (7,757,723)	\$ (1,793,567)	
Non-Operating Income (Expense)	-	-	-	-	-	-	671,603	15,142,855	(14,471,253)	
Total Non-Cash Items	<u>\$ (93,409)</u>	<u>\$ (78,650)</u>	<u>\$ (14,759)</u>	<u>\$ (6,067)</u>	<u>\$ (12,145)</u>	<u>\$ 6,078</u>	<u>\$ (8,879,687)</u>	<u>\$ 7,385,132</u>	<u>\$ (16,264,819)</u>	
Change in Net Position	<u><u>\$ 464,087</u></u>	<u><u>\$ (303,053)</u></u>	<u><u>\$ 767,140</u></u>	<u><u>\$ 47,714</u></u>	<u><u>\$ (32,590)</u></u>	<u><u>\$ 80,304</u></u>	<u><u>\$ 25,692,783</u></u>	<u><u>\$ 8,024,242</u></u>	<u><u>\$ 17,668,541</u></u>	I(c)(1)

Opportunity Home San Antonio
Financial Performance Report
Condensed Statement of Revenue and Expenses - Capital Activities
(For the Six Months Ended 12/31/2025)
(Unaudited)

Account Description	Real Estate			Capital Funds			Total - Capital Activities			Highlights Section
	Actual	Budget	Variance	Actual	Budget	Variance	Actual	Budget	Variance	
Operating Revenue										
Grants	\$ -	\$ -	\$ -	\$ 6,337,572	\$ 4,150,625	\$ 2,186,947	\$ 6,337,572	\$ 4,150,625	\$ 2,186,947	II(a)(1)
Miscellaneous Revenue	1,550,203	2,843,172	(1,292,968)	-	53,008	(53,008)	1,532,320	2,896,180	(1,363,859)	II(a)(2)
Total Operating Revenue	<u>\$ 1,550,203</u>	<u>\$ 2,843,172</u>	<u>\$ (1,292,968)</u>	<u>\$ 6,337,572</u>	<u>\$ 4,203,633</u>	<u>\$ 2,133,939</u>	<u>\$ 7,869,892</u>	<u>\$ 7,046,805</u>	<u>\$ 823,087</u>	
Operating Expenses										
Salaries and Benefits	\$ 1,548,011	\$ 1,742,877	\$ (194,867)	\$ -	\$ 53,397	\$ (53,397)	\$ 1,548,011	\$ 1,796,274	\$ (248,264)	II(b)(1)
Ordinary Maintenance and Repairs	56,315	32,340	23,975	-	-	-	56,315	32,340	23,975	
Utilities	14,166	1,498	12,668	-	-	-	14,166	1,498	12,668	
Other Expenses	1,304,629	863,855	440,774	600,143	1,590,095	(989,952)	1,875,929	2,413,762	(537,833)	II(b)(2)
Management Fees	11,821	3,418	8,404	859,857	850,566	9,291	-	-	-	
Total Operating Expenses	<u>\$ 2,934,942</u>	<u>\$ 2,643,988</u>	<u>\$ 290,954</u>	<u>\$ 1,460,000</u>	<u>\$ 2,494,058</u>	<u>\$ (1,034,059)</u>	<u>\$ 3,494,421</u>	<u>\$ 4,243,874</u>	<u>\$ (749,454)</u>	
Net Operating Income	<u>\$ (1,384,739)</u>	<u>\$ 199,184</u>	<u>\$ (1,583,923)</u>	<u>\$ 4,877,572</u>	<u>\$ 1,709,575</u>	<u>\$ 3,167,998</u>	<u>\$ 4,375,472</u>	<u>\$ 2,802,930</u>	<u>\$ 1,572,541</u>	
Non-Operating Income (Expenses)										
Interest Expense	\$ (360,993)	\$ (146)	\$ (360,847)	\$ (17,394)	\$ (17,394)	\$ -	\$ (378,387)	\$ (17,540)	\$ (360,847)	II(c)(1)
Interest Income	1,044,748	725,198	319,550	26,329	31,871	(5,542)	983,407	749,569	233,838	
Transfers	1,515,253	-	1,515,253	(1,894,637)	(1,701,132)	(193,506)	(174,924)	-	(174,924)	
Other Income (Expenses)	(313,077)	(136,208)	(176,869)	(560,895)	-	(560,895)	(873,972)	(136,208)	(737,764)	II(c)(1)
Total Non-Operating Income (Expenses)	<u>\$ 1,885,931</u>	<u>\$ 588,844</u>	<u>\$ 1,297,087</u>	<u>\$ (2,446,597)</u>	<u>\$ (1,686,655)</u>	<u>\$ (759,943)</u>	<u>\$ (443,875)</u>	<u>\$ 595,821</u>	<u>\$ (1,039,696)</u>	
Surplus (Deficit) Before Non-Cash Items	<u>\$ 501,192</u>	<u>\$ 788,028</u>	<u>\$ (286,836)</u>	<u>\$ 2,430,975</u>	<u>\$ 22,920</u>	<u>\$ 2,408,055</u>	<u>\$ 3,931,596</u>	<u>\$ 3,398,751</u>	<u>\$ 532,845</u>	
Non-Cash Items										
Depreciation and Amortization	\$ (36,936)	\$ (39,106)	\$ 2,171	\$ -	\$ -	\$ -	\$ (36,936)	\$ (39,106)	\$ 2,171	
Non-Operating Income (Expense)	21,390	-	21,390	24,216	(31,871)	56,086	45,606	(31,871)	77,476	II(c)(1)
Total Non-Cash Items	<u>\$ (15,546)</u>	<u>\$ (39,106)</u>	<u>\$ 23,561</u>	<u>\$ 24,216</u>	<u>\$ (31,871)</u>	<u>\$ 56,086</u>	<u>\$ 8,670</u>	<u>\$ (70,977)</u>	<u>\$ 79,647</u>	
Change in Net Position	<u><u>\$ 485,646</u></u>	<u><u>\$ 748,922</u></u>	<u><u>\$ (263,275)</u></u>	<u><u>\$ 2,455,190</u></u>	<u><u>\$ (8,951)</u></u>	<u><u>\$ 2,464,141</u></u>	<u><u>\$ 3,940,266</u></u>	<u><u>\$ 3,327,774</u></u>	<u><u>\$ 612,492</u></u>	II(c)(1)

Opportunity Home San Antonio
Financial Performance Report
Comparative Balance Sheet
As of December 31, 2025
(Unaudited)

	12/31/2025	12/31/2024	Increase (Decrease)	%	Highlights Section
Assets					
Current Assets	\$ 140,245,070	\$ 110,281,799	\$ 29,963,271	27.17%	
Fixed Assets	467,536,692	403,131,691	64,405,001	15.98%	
Other Non-Current Assets	44,427,432	102,190,632	(57,763,200)	-56.52%	
Total Assets	\$ 652,209,194	\$ 615,604,122	\$ 36,605,072	5.95%	
Deferred Outflows of Resources					
Deferred Charges on Refunding	\$ 236,165	\$ 136,458	\$ 99,707	73.07%	
Deferred Swap Outflows	339,328	78,722	260,606	331.05%	
Total Deferred Outflows of Resources	\$ 575,493	\$ 215,180	\$ 360,313	167.45%	
Total Assets and Deferred Outflows of Resources	\$ 652,784,687	\$ 615,819,302	\$ 36,965,385	6.00%	III(a)
Liabilities					
Current Liabilities	\$ 47,171,156	\$ 27,478,627	\$ 19,692,529	71.66%	
Non-Current Liabilities	158,720,060	131,856,572	26,863,488	20.37%	
Total Liabilities	\$ 205,891,216	\$ 159,335,199	\$ 46,556,017	29.22%	
Deferred Inflows of Resources					
Leased Assets	\$ 66,969,010	\$ 63,995,439	\$ 2,973,571	4.65%	
Deferred Swap Inflows	126,481	533,747	(407,266)	-76.30%	
Total Deferred Inflows of Resources	\$ 67,095,491	\$ 64,529,186	\$ 2,566,305	3.98%	
Total Liabilities and Deferred Inflows of Resources	\$ 272,986,707	\$ 223,864,385	\$ 49,122,322	21.94%	III(b)
Net Position					
Net Investment in Capital Assets	\$ 287,651,998	\$ 271,966,024	\$ 15,685,974	5.77%	
Restricted Net Position	52,163,511	39,652,392	12,511,119	31.55%	
Unrestricted Net Position	39,982,471	80,336,501	(40,354,030)	-50.23%	
Total Net Position	\$ 379,797,980	\$ 391,954,917	\$ (12,156,937)	-3.10%	III(c)
Total Liabilities, Deferred Inflows of Resources, and Net Position	\$ 652,784,687	\$ 615,819,302	\$ 36,965,385	6.00%	

**Opportunity Home San Antonio
Financial Performance Report**

As of December 31, 2025

(Unaudited)

HIGHLIGHTS

For the six months ended December 31, 2025, the Operations segment generated a surplus before non-cash items of \$34.6 million, which was \$33.9 million above budget. Total Operating Revenue was below budget by \$2.7 million or 2.11%, and Total Operating Expenses were below budget by \$10.3 million, or 8.38%.

For the six months ended December 31, 2025, the Capital segment produced a surplus before non-cash items of \$3.9 million, which was \$0.5 million above budget. Total Operating Revenue was above budget expectations by \$0.8 million, or 11.68%, and Total Operating Expenses were below budget by \$0.7 million, or 17.66%.

Total Assets and Deferred Outflows of Resources increased by \$37.0 million, or 6.00%. Total Liabilities and Deferred Inflows of Resources increased by \$49.1 million, or 21.94%. Presented below are explanations that summarize the results of operations (Operations and Capital segments) and the combined changes in financial condition.

I. Income Statement (Operations)

Total Operating Revenue was below budget by \$2.7 million and Total Operating Expenses were below budget by \$10.3 million.

(a) **Operating Revenue**

- (1) Tenant Revenue was \$0.5 million below budget, primarily due to the Public Housing portfolio. Overall portfolio occupancy remained strong at 96.6%. Bad debt write-offs exceeded the budget by approximately \$0.4 million.
- (2) Grant revenue exceeded the budget by \$3.6 million, driven primarily by \$1.4 million in additional Section 8 administrative fees. This increase reflects HUD's reconciliations for the first and second quarters of 2025, as well as an increased proration rate for calendar year 2025. Project-based Section 8 HAP subsidies in the Affordable Housing Communities ("AHC") portfolio were \$0.5 million over budget, reflecting increases in contract rents. Operating subsidy exceeded the budget by \$1.0 million, driven by HUD's interim proration rate of 102.58% as of December 2025 versus the budgeted 96.97%. Additionally, Public Housing recognized \$0.9 million in shortfall funding.
- (3) Section 8 Housing Assistance Payment (HAP) Revenue ended the period \$5.8 million below budget. This was offset by a corresponding \$5.8 million positive variance in Section 8 HAP Expense. The variances in both revenue and expense were primarily

**Opportunity Home San Antonio
Financial Performance Report**

As of December 31, 2025

(Unaudited)

driven by decreased voucher utilization in the HCV program during the period, resulting in fewer payments to landlords and lower subsidy revenue from HUD.

(b) **Operating Expenses**

- (1) Salaries and Benefits ended the period \$2.4 million under budget, with favorable performance across all segments, demonstrating effective cost management and efficiency in staffing costs.
- (2) Other Expenses were \$2.2 million below budget, due to favorable variances of \$0.5 million in technology and licensing fees, \$1.2 million in consulting fees, \$0.6 million in protective services, and \$0.2 million in insurance costs.

(c) **Summary of Change in Net Position**

- (1) Change in Net Position was \$17.7 million above budget. Net Operating Income exceeded budget by \$7.6 million, while HUD-Held Fund Draws were \$27.0 million higher than budgeted. A detailed breakdown of HUD-Held Fund Draws is provided in Section IV of this report. Interest expense in the AHC portfolio was \$1.1 million above budget, primarily due to issuance costs for the Amara bonds and unbudgeted interest on the Costa Valencia and Rosemont at Highland Park bonds. Non-Operating Income (Expense) was \$14.5 million below budget, reflecting lower capital grant revenue and the recognition of a non-cash loss from the Artisan at Creekside acquisition.

II. Income Statement (Capital)

Total Operating Revenue was above budget by \$0.8 million, while Total Operating Expenses were under budget by \$0.7 million.

(a) **Operating Revenue**

- (1) Grant revenue was above budget by \$2.2 million in the Capital Fund Program (CFP) due to timing of CFP grant soft costs.
- (2) Miscellaneous Revenue was \$1.4 million below budget, primarily due to lower-than-anticipated developer fees and bond issuer fees.

**Opportunity Home San Antonio
Financial Performance Report**

As of December 31, 2025

(Unaudited)

(b) **Operating Expenses**

- (1) Salaries and Benefits were under budget by \$0.2 million, as a result of lower staffing costs than anticipated.
- (2) Other Expenses came in \$0.5 million below budget, reflecting a favorable \$0.9 million variance in consulting fees, partially offset by \$0.4 million in unfavorable legal fees.

(c) **Summary of Changes in Net Position**

- (1) Change in Net Position ended the period with a \$0.6 million favorable variance. Net Operating Income was above budget by \$1.6 million. Interest Expense was \$0.4 million over budget, attributable to Snowden loan extension fees and the underwriting fee for the Amara bonds. Other Income (Expenses) was \$0.7 million unfavorable primarily due to unbudgeted environmental remediation expenses.

III. Balance Sheet

Total Assets and Deferred Outflows of Resources increased by \$37.0 million, Total Liabilities and Deferred Inflows of Resources increased by \$49.1 million, and Total Net Position decreased by \$12.1 million.

- (a) Total Assets and Deferred Outflows of Resources increased by \$37.0 million, or 6.00%. Current Assets increased by \$30.0 million (27.17%), and Fixed Assets rose by \$64.4 million (15.98%). Meanwhile, Other Non-Current Assets decreased by \$57.8 million (56.52%). Current assets increased by \$30.0 million, driven primarily by a \$16.3 million increase in assets held for sale related to the pending sale of Rosemont at Highland Park and Costa Valencia. Additionally, the discontinuation of Section 8 HAP prefunding led to an \$8.4 million reduction in prepaid expenses and an \$11.3 million increase in restricted cash. Partially offsetting the overall increase was a decrease in HUD receivables of \$3.6 million. Fixed Assets increased by \$64.4 million during the period. The increase was primarily driven by a \$99.2 million rise in buildings, largely attributable to the acquisitions of Elan Gardens, Amara, and Artisan at Creekside within the AHC portfolio, as well as capitalized project costs across both the AHC and Public Housing portfolios. These increases were partially offset by asset reclassifications for properties held for sale and the demolition of Homestead. Land increased by \$7.6 million, reflecting the Amara acquisition. Construction in progress decreased by \$31.3 million, primarily reflecting the capitalization of 100 Labor Apartments upon being placed into service, which transferred costs into buildings. The overall increase in Fixed Assets was partially offset by routine depreciation. Other

**Opportunity Home San Antonio
Financial Performance Report**

As of December 31, 2025

(Unaudited)

Non-Current Assets decreased by \$57.8 million, primarily due to the establishment of a \$58.8 million allowance for doubtful accounts related to notes receivable from various tax credit partnerships. Following a thorough assessment of the partnerships' historical audited financial statements, it was concluded that projected cash flows are insufficient to support full repayment of the outstanding notes.

- (b) Total Liabilities and Deferred Inflows of Resources increased by \$49.1 million, or 21.94%. The \$19.7 million increase in Current Liabilities was primarily due to the reclassification of long-term debt for Rosemont at Highland Park (\$11.0 million) and Costa Valencia (\$9.4 million) to Current Liabilities. These reclassifications reflect the expectation that the associated bonds will be redeemed upon the pending sale of the properties. Non-Current Liabilities increased by \$26.9 million, primarily driven by a \$29.5 million bond issuance to finance the acquisition of Amara Apartments, \$10.3 million in new debt issued as part of the Elan Gardens refinance, and \$15.0 million of debt assumed in connection with the acquisition of Artisan at Creekside. These increases were partially offset by the reclassification of \$24.0 million in total long-term debt for San Juan II, Rosemont at Highland Park, and Costa Valencia to Current Liabilities, as well as regular principal payments on existing debt.
- (c) Total Net Position decreased by \$12.1 million, or 3.10% as a result of the changes described above.

IV. MTW Expenditures

Project	Draws as of 12/31/25	
	HUD-Held Funds	Capital Fund Program
Public Housing Operating Shortfall	\$2,057,668	\$1,719,713
Investment in MTW Units at Tax Credit/AHC Properties:		
Amara Apartments Acquisition	\$27,354,369	
Artisan at Creekside Apartments Acquisition	\$1,531,941	
Community Development Initiatives	\$1,004,044	
Investment for City Bond Matching Funds:		
Midcrowne - Housing Bond Rehab	\$86,125	
Total	\$32,034,147	\$1,719,713

Summary of Major Changes in Cash and Investment Balance

For the Quarterly Period Ended December 31, 2025

The total cash and investment balance increased by \$3.4 million from the previous quarter, primarily due to three factors: a \$0.9 million net increase in Development Activities - SAHFC unrestricted cash due to the collection of developer fees; a \$1.4 million net increase in Centralized Bank Account unrestricted cash due to intercompany settlements; and a \$1.1 million increase in Other AHC Properties restricted cash due to the acquisition of Artisan at Creekside.

Unrestricted Cash and Investments

- **Section 8** - Net cash increased by \$1.4 million, primarily due to the timing of a transfer from Section 8 restricted cash, which originated from higher administrative fee funding under HUD's CY 2025 rate increase and first quarter 2025 reconciliation.
- **Development Activities - SAHFC** - Net cash increased by \$0.9 million due to the collection of developer fees from Mira Vista, Vista at Reed, and Bristol.
- **Centralized Bank Account** - Net cash increased by \$1.4 million, mainly reflecting the timing of reimbursements from operating properties.

Restricted Cash and Investments

- **Section 8** - Net cash decreased by \$1.4 million, primarily due to the timing of transfers to Section 8 unrestricted cash. The effects of \$0.5 million in Section 8 subsidies exceeding landlord payments and \$0.5 million used to support operations and other MTW-authorized activities largely offset each other.
- **Other AHC Properties** - Net cash increased by \$1.1 million due to the acquisition of Artisan at Creekside. This cash was fully bond-restricted and applied to the property's refinancing in January.

**Opportunity Home San Antonio
Cash and Investment Summary
December 31, 2025**

	Balance 9/30/2025	Deposits	Withdrawals	Balance 12/31/2025
Cash				
Unrestricted Cash:				
Public Housing (1)	547,863	21,349,048	21,772,856	124,055
Section 8 (1)	6,615,568	4,967,979	3,551,248	8,032,299
AHC Project Based Properties (1)	5,013,681	2,655,833	2,663,294	5,006,220
AHC Properties under SAHFC	4,848,659	7,117,943	7,397,301	4,569,301
Other AHC Properties	2,069,469	63,338,255	62,974,450	2,433,274
Central Office Cost Center (1)	4,767,424	17,611,633	17,973,167	4,405,890
Central Office- Health Insurance (2)	864,194	3,169,763	2,837,344	1,196,613
Community Development Initiatives	25,366	3,639,662	3,607,852	57,176
Development Activities - SAHFC	2,695,134	3,069,284	2,215,708	3,548,710
Development Activities - Las Varas	4,750,402	1,565,282	1,463,903	4,851,781
Development Activities - Other Entities	6,171,495	1,628,657	1,320,919	6,479,233
Homeownership	109,708	35,724	34,265	111,167
Capital Fund Program (1)	-	1,825,279	1,825,279	-
Centralized Bank Account	5,032,696	66,604,359	65,163,874	6,473,181
Sub-Total:	43,511,661	198,578,701	194,801,460	47,288,899
Restricted Cash:				
Public Housing (1)	13,670,646	872,873	682,416	13,861,103
Section 8 (1)	14,142,194	39,020,759	40,372,966	12,789,987
AHC Project Based Properties (1)	2,858,749	160,776	560,368	2,459,157
AHC Properties under SAHFC	3,504,522	123,171	178,480	3,449,213
Other AHC Properties	1,654,288	1,238,662	153,772	2,739,178
Central Office Cost Center (1)	1,079,481	-	-	1,079,481
Development Activities - SAHFC	2,198,907	1,623,394	1,563,818	2,258,483
Development Activities - Refugio Street PFC	8,170,568	-	-	8,170,568
Development Activities - Las Varas PFC	478,956	-	-	478,956
Capital Fund Program (1)	1,421,868	12,579	-	1,434,447
Other Restricted Cash	1,496,321	174,676	69,844	1,601,153
Endowment Trust	174,985	5,899	46,851	134,033
Sub-Total:	50,851,485	43,232,789	43,628,515	50,455,759
Total Unrestricted & Restricted Cash:	94,363,146	241,811,490	238,429,975	97,744,658
Investments				
Unrestricted Investments at Various Banks:				
Central Office Cost Center (1)	-	-	-	-
Restricted Investments at Various Banks:				
Central Office Cost Center	77,793	303,021	302,858	77,956
Properties under SAHFC	1,240,613	59,955,354	59,973,208	1,222,759
Other Restricted Investments	842,654	362,017	318,685	885,986
Sub-Total:	2,161,060	665,038	621,543	2,186,701
Total Cash & Investments:	96,524,206	242,476,528	239,051,518	99,931,359

Footnotes:

- (1) Cash and Investments related to federal programs
(2) Cash and Investments related to self-insurance program

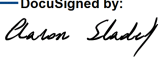
**Opportunity Home San Antonio
Cash Held for Tax Credit Partnerships
December 31, 2025**

	9/30/2025	Deposits	Withdrawals	12/31/2025
Cash from Tax-Credit Partnerships	1,360,171	195,773	106,280	1,449,664
Total Cash Held for Partnerships Managed by AHC:	\$ 1,360,171	\$ 195,773	\$ 106,280	\$ 1,449,664

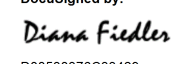
**Opportunity Home San Antonio
Collateralization
December 31, 2025**

	Total Deposits	Deposits Covered by FDIC	Deposits Covered by Collateral	Pledged Collateral
Frost National Bank	\$ 92,898,635	\$ 500,000	\$ 92,898,635	\$ 132,813,236
Lument Capital, LLC	\$ 2,968,852	\$ 1,174,952	\$ -	\$ -
US Bank	\$ 27,677	\$ -	\$ -	\$ -
Bank of New York - Converse Ranch II	\$ -	\$ -	\$ -	\$ -
Wells Fargo - Rosemont at Highland Park	\$ 224,351	\$ -	\$ -	\$ -
Walker & Dunlop - Converse Ranch I	\$ 322,492	\$ 281,016	\$ -	\$ -
Berkadia Commercial Mortgage, LLC	\$ 228,788	\$ 228,788	\$ -	\$ -
Total Collateralized deposits:	\$ 96,670,794	\$ 2,184,755	\$ 92,898,635	\$ 132,813,236

FDIC has made permanent the standard coverage - all funds in noninterest-bearing accounts are fully insured up to \$250,000. The accompanying Cash and Investment Summary Report has been prepared in accordance with the compliance requirements of the Texas Public Funds Investment Act, Chapter 2256. As the Investment Officer for the Opportunity Home San Antonio I certify that all investments in our portfolio comply with the investment strategy expressed in Opportunity Home's Investment Policy dated March 6, 2025 and with the relevant provisions of the State of Texas, Government Code, Chapter 2256, Public Funds Investment.

DocuSigned by:

 2/17/2026
 B49E70EF2DD9490...

Aaron Sladek
 Senior Director of Finance and Accounting

DocuSigned by:

 2/17/2026
 D86538376C33429...

Diana K. Fiedler, CPA, CGMA
 Investment Officer and Executive Vice President, Chief Financial Officer

GRANTS REPORT AS OF December 31, 2025

CAPITAL FUND GRANTS											CAPITAL GRANTS Unmet expenditure deadline approaching within 6 Months Unmet obligation deadline approaching within 12 Months Grant expenditure is not progressing as planned
Grant Number	Obligation End Date	Expenditure End Date	Amount to be Obligated by End Date	LOCCS Authorized	Cumulative PHA Obligated	Unobligated Amount	Obligation Percentage	Cumulative GL PHA Expended	Expended Percentage	LOCCS Disbursement	
Capital Fund Program (CFP)											
Capital Projects at various PH Properties											
TX59P006501-20	03/25/24	03/25/26	\$ 11,827,386.00	\$ 13,141,540.00	\$ 13,141,540.00	\$ -	100%	\$ 13,141,540.00	100%	\$ 13,141,540.00	
*Major Projects: Madonna, L.C. Rutledge											
TX59P006501-22	05/11/24	05/11/26	\$ 14,590,927.80	\$ 16,212,142.00	\$ 16,212,142.00	\$ -	100%	\$ 16,168,244.36	99%	\$ 16,154,244.36	
*Major Projects: Villa Veramendi, Riverside											
TX59P006501-23	02/16/25	02/16/27	\$ 14,882,453.10	\$ 16,536,059.00	\$ 16,536,059.00	\$ -	100%	\$ 15,585,430.08	94%	\$ 15,585,430.08	
*Major Projects: Fair Avenue, Villa Hermosa											
TX59P006501-24	05/05/26	05/05/28	\$ 15,310,184.40	\$ 17,011,316.00	\$ 14,757,521.06	\$ 2,253,794.94	87%	\$ 9,154,738.31	54%	\$ 8,695,124.81	
*Major Projects: Cassiano, Riverside											
TX59P006501-25	05/12/27	05/12/29	\$ 15,623,816.40	\$ 17,359,796.00	\$ 5,159,139.60	\$ 12,200,656.40	30%	\$ 5,159,139.60	30%	\$ 5,159,139.60	
*Major Projects: Morris C. Beldon,Villa Hermosa											
TX59E006501-21	08/28/25	08/28/26	\$ 9,778.10	\$ 10,864.56	\$ 10,864.56	\$ -	100%	\$ 10,864.56	100%	\$ 10,864.56	
*Safety and Security Grant at Village East											
TX59E006501-24	06/19/25	06/19/26	\$ 105,530.00	\$ 56,345.82	\$ 56,345.82	\$ -	100%	\$ 56,345.82	100%	\$ -	
*Safety and Security Grant at Westway, Mission Park, Cheryl West											
TX59E006501-25	09/17/26	09/17/27	\$ 220,941.00	\$ 245,490.00	\$ -	\$ 245,490.00	0%	\$ -	0%	\$ -	
*Safety and Security Grant at Alazan											
TX59H006501-22	09/07/26	09/07/28	\$ 4,064,580.00	\$ 4,516,200.00	\$ 690,000.00	\$ 3,826,200.00	15%	\$ 600,000.00	13%	\$ 600,000.00	
*Housing-Related Hazards Grant at Blanco, Matt Garcia											
TX59H006501-24	09/16/26	09/16/28	\$ 4,320,000.00	\$ 4,800,000.00	\$ 885,000.00	\$ 3,915,000.00	18%	\$ -	0%	\$ -	
*Housing-Related Hazards Grant at Villa Hermosa											
TX59L006501-20	11/10/25	11/10/27	\$ 2,211,363.54	\$ 2,457,070.60	\$ 2,243,923.79	\$ 213,146.81	91%	\$ 2,143,526.00	87%	\$ 2,143,526.00	
*Lead Based Paint Grant at Lincoln Heights, Riverside											
TX59L006501-22	09/07/25	09/07/27	\$ 4,288,198.50	\$ 4,764,665.00	\$ 1,359,406.50	\$ 3,405,258.50	29%	\$ 47,370.00	1%	\$ 47,370.00	
*Lead Based Paint Grant at Cassiano											
TX59L006501-24	09/16/26	09/16/28	\$ 5,650,029.00	\$ 6,277,810.00	\$ 525,000.00	\$ 5,752,810.00	8%	\$ 525,000.00	8%	\$ 525,000.00	
*Lead Based Paint Grant at Alazan											
CHOICE NEIGHBORHOOD GRANT											
Urban Revitalization Program (URP)/(Hope 6)											
Choice Neighborhood Grant											
TX59URD006N102	09/26/03	09/30/08		\$ 200,000.00	\$ 200,000.00	\$ -	100%	\$ 200,000.00	100%	\$ 200,000.00	
*Implementation grant for Victoria Neighborhood											

- (1) This grant is expended and disbursed at 100%; however, HUD requests monthly updates in eLOCCS until the grant is fully closed out. Staff is working with HUD to close out the grant.
- (2) The project intended to be obligated under this grant is currently on hold pending the Environmental Review process. Staff anticipates meeting the 90% obligation requirement by the Obligation End Date deadline.
- (3) This grant was awarded in September 2025, but funds have not been made available. The HUD requested documentation has been submitted; currently waiting for HUD to review and spread awarded funds to obligate.
- (4) The project intended to be obligated under this grant is currently in the design and permitting process. Staff anticipates meeting the 90% obligation requirement by the Obligation End Date deadline.
- (5) Staff has sent an email to HUD requesting the return of excess funds. The grant will be fully obligated once HUD processes the recapture.

CONGRESSIONAL GRANTS						CAPITAL GRANTS ☐ Grant expenditure is not progressing as planned		
Grant Number	Contract Effective Date	Contract End Date	Award Amount	Cumulative Expended	Expended Percentage	Remaining to Expend	Reimbursement Received	
Economic Development Initiative/Community Project Funding (EDI/CPF) Grants provide investment in a wide variety of projects such as housing, homelessness prevention, workforce training, public facilities, parks, resilience planning and other critical infrastructure and services								
B-23-CP-TX-1393 *Major Projects: Generator Install at Highview, Fair, Riverside, Window at Linda Lou and Highview	09/30/23	08/31/31	\$ 2,160,000.00	\$ 59,160.00	3%	\$ 2,100,840.00	\$ 59,160.00	
B-24-CP-TX-2061 *Major Projects: Alazan Community Improvements	08/13/24	08/31/32	\$ 850,000.00	\$ -	0%	\$ 850,000.00	\$ -	(6)
B-24-CP-TX-2068 *Major Projects: Critical Needs Infrastructure Work at Towering Oaks	08/13/24	08/31/32	\$ 850,000.00	\$ -	0%	\$ 850,000.00	\$ -	(6)

CITY OF SAN ANTONIO FUNDS								
Grant Number	Construction Start Date	Construction End Date	Award Amount	Cumulative Expended	Expended Percentage	Remaining to Expend	Reimbursement Received	
City of San Antonio Affordable Housing Bond Program City Housing Bond Funds (CHB)								
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Westside Reinvestment Initiative (Villa Fortuna) - Homebuyer Assistance & Construction Reimbursement	12/15/22	09/12/24	\$ 218,655.00	\$ 218,655.00	100%	\$ -	\$ 218,655.00	
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Victoria Plaza - Roof Replacement	06/17/24	01/21/25	\$ 2,500,000.00	\$ 2,500,000.00	100%	\$ -	\$ 2,500,000.00	
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Cottage Creek I and Cottage Creek II - Apartment Rehabilitation	09/27/24	08/15/25	\$ 1,740,069.00	\$ 959,203.38	55%	\$ 780,865.62	\$ 533,241.33	(7)
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Pecan Hill - Elevator Moderniation	04/25/23	03/30/26	\$ 438,431.00	\$ 437,418.33	99%	\$ 1,012.67	\$ 394,588.00	
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Woodhill - Apartment Rehabilitation	11/12/24	04/03/26	\$ 6,794,712.00	\$ 6,709,893.00	99%	\$ 84,819.00	\$ 6,041,243.55	
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Midcrown - Apartment Rehabilitation	12/09/24	04/30/26	\$ 2,500,000.00	\$ -	0%	\$ 2,500,000.00	\$ -	(8)
FY22 Housing Bond Rental Acquisition, Rehabilitation and Preservation *Ravello - Apartment Rehabilitation	12/09/24	04/30/26	\$ 2,500,000.00	\$ -	0%	\$ 2,500,000.00	\$ -	(8)
City of San Antonio Grants Monitoring and Administration HOME Funds								
HOME Investment Partnerships Program from HUD (ALN 14.239) *Westside Reinvestment Initiative (Palm Lake) - Homebuyer Assistance & Construction Reimbursement	03/17/25	07/01/26	\$ 440,669.00	\$ 120,182.46	27%	\$ 320,486.54	\$ -	(9)

- (6) This Congressional grant is pending HUD review and approval of documents to gain access to funds.
- (7) Staff has been in communication with City staff regarding the progress of the project and officially submitted an extension request.
- (8) Staff is working with the City to finalize the contracts and extend the construction end date.
- (9) The HOME grant is for eleven homes currently in the construction phase. 4 homes have been completed of which 3 home have been sold.

HARRIS COUNTY GRANTS										PROGRAM GRANTS ☐ Grant expenditure is not progressing as planned	
Grant Number		Contract Effective Date	Contract End Date		Award Amount		Cumulative Expended		Expended Percentage	Remaining to Expend	Reimbursement Received
Texas Solar for All The Texas Solar for All Coalition: A Collaborative Effort to Enable Low-Income Solar and Storage. Subrecipient of Harris County's grant award											
Zero-Emissions Technology Grant Program (ALN 66.959)		09/01/24	08/31/29		\$ 24,043,424.00	\$ -		0%	\$ 24,043,424.00	\$ -	(10)
Solar panel installation at various sites											

(10)

HUD - PROGRAM GRANTS							
Grant Number	Effective Date	Expenditure End Date	LOCCS Authorized	Cumulative Expended	Expended Percentage	Remaining to Expend	LOCCS Disbursement
Resident Opportunities & Self Sufficiency (ROSS) Funding for Family Self Sufficiency (FSS) Coordinators							
ROSS221724-01-00	06/01/22	05/31/25	\$ 621,050.50	\$ 610,699.53	98%	\$ 10,350.97	\$ 610,699.53
*2021 ROSS Service Coordinators							
ROSS252123	06/01/25	05/31/28	\$ 739,349.00	\$ 84,308.97	11%	\$ 655,040.03	\$ 53,829.87
*2024 ROSS Service Coordinators							
FSS25TX6212	01/01/25	12/31/25	\$ 1,179,749.00	\$ 1,173,301.66	99%	\$ 6,447.34	\$ 912,469.11
*PH & HCV Combined FSS 2024							
Jobs Plus Funding for PHAs to develop locally-based approaches to increase earnings and advance employment outcomes for Public Housing residents							
TX006FJP6JPH20	05/14/21	12/31/26	\$ 2,300,000.00	\$ 1,400,996.67	61%	\$ 899,003.33	\$ 1,310,964.76
*Jobs Plus - Lincoln Heights							

(11)

(12)

(13)

NON-HUD - PROGRAM GRANTS							
Grant Number	Performance Date	Award Amount	Cumulative Expended	Expended Percentage	Remaining to Expend	Reimbursement Received	
VIA Metropolitan Transit Authority Capital Assistance Program For Elderly Persons and Persons With Disabilities							
TX-2021-010-00	09/20/21 - 12/31/25	\$ 79,110.00	\$ 72,814.89	92%	\$ 6,295.11	\$ 65,912.00	(14)
*VIA Grant 2021							

(14)

- (10) A Stop Work notice was received from Harris County in August 2025 providing information that the EPA is purporting to terminate the Grant Agreement. All work has been suspended.
- (11) The 2021 ROSS grant ended on 05/31/25 and \$10,350.97 remained unexpended. Unexpended funds will remain in eLOCCS until the grant is officially closed out.
- (12) The 2024 FSS grant ended on 12/31/25 and \$6,447.34 remained unexpended. Unexpended funds will remain in eLOCCS until the grant is officially closed out.
- (13) Grant expenditures are approximately \$493K short of the projected average cumulative expended amount or expended percentage of 82%.
- (14) The VIA grant Performance Date ended on 12/31/25 and \$6,295.11 remained unexpended.

LIST OF GRANT APPLICATIONS					
Grant Name	Description	Award Amount	Match Amount	Date Submitted	Application Status
FY25 Texas Cavaliers	Texas Cavaliers Foundation	\$9,982	N/A	03/31/25	Pending
FY25 Section 5310 Grant	Federal Transit Administration/VIA	\$6,680	N/A	04/04/25	Pending
FY 26 Congressional Allocation - Castro	HUD Congressional Grant	\$1,124,400	N/A	04/24/25	Pending
FY 26 Congressional Allocation - Casar	HUD Congressional Grant	\$2,451,253	N/A	05/16/25	Pending
FY25 Loss Prevention Fund	HAI Loss Prevention Fund	\$200,000	N/A	05/30/25	Awarded 10/09/2025
FHLB Dallas Fortified Fund	Roof Replacement	\$1,000,000	N/A	08/26/25	Awarded 11/12/2025

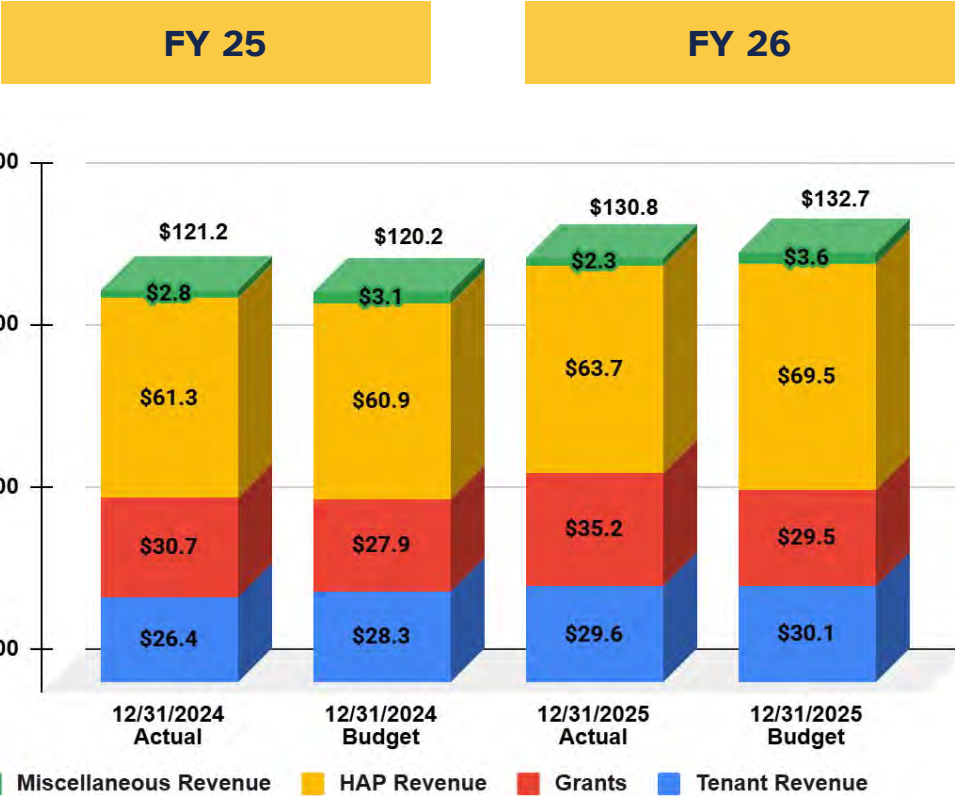
Financial Performance Report

For the Six Months Ended December 31, 2025

Fiscal Year Comparison

Consolidated Operating Revenue

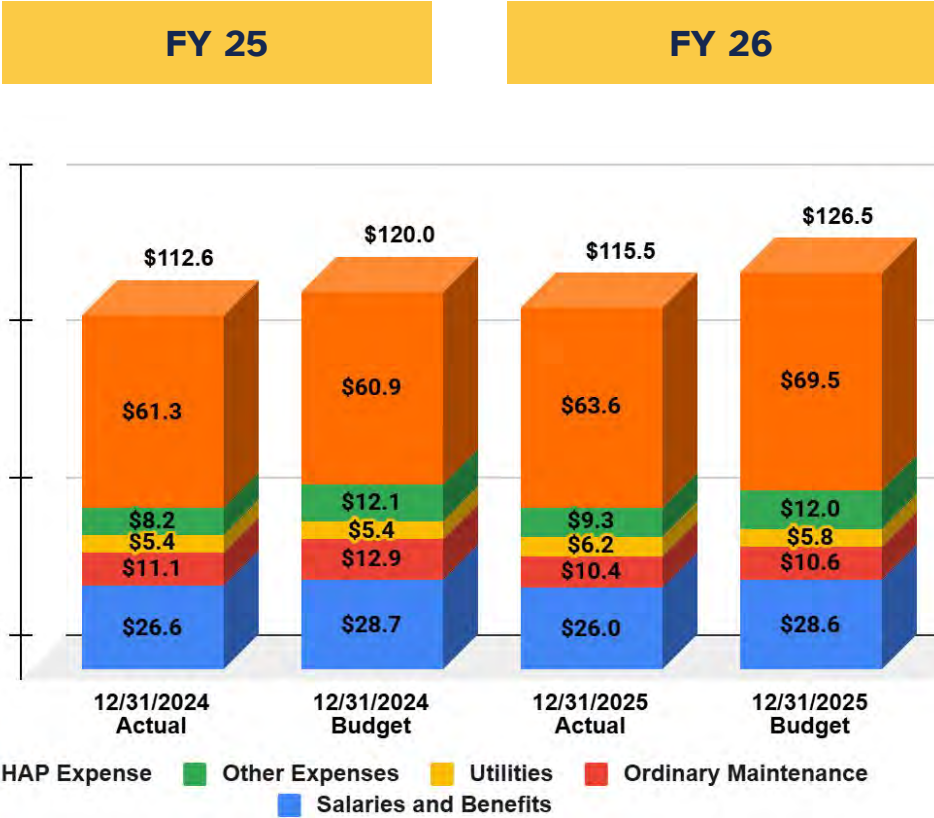
Total Operating Revenue increased by 7.9%, with the majority of revenue categories showing favorable results.



Fiscal Year Comparison

Consolidated Operating Expenses

Total Operating Expenses increased by 2.6% from the prior year, driven primarily by higher Housing Assistance Payment (HAP) Expense.

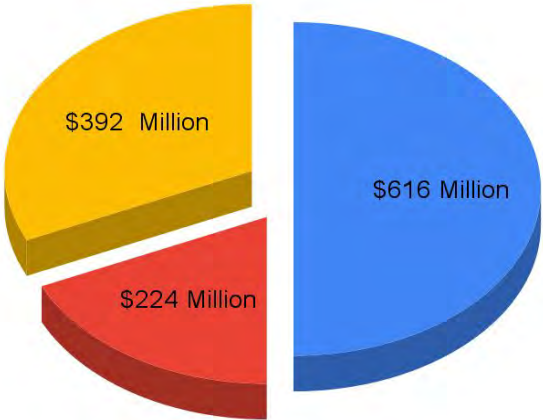


Financial Ratios

Financial Strength

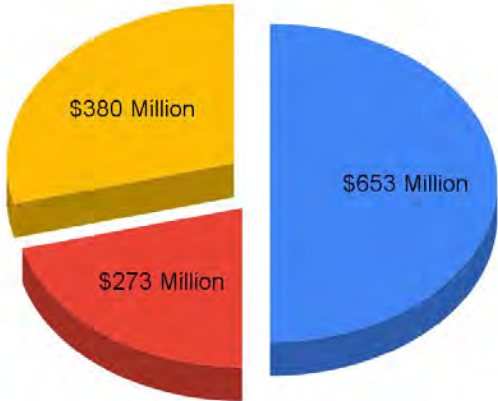
The debt-to-equity ratio increased from **0.39** to **0.54**, indicating a continued strong solvency position.

December 31, 2024



● Assets ● Debt ● Equity

December 31, 2025



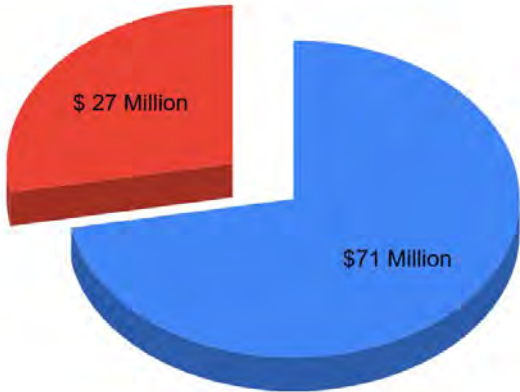
● Assets ● Debt ● Equity

Financial Ratios

Financial Liquidity

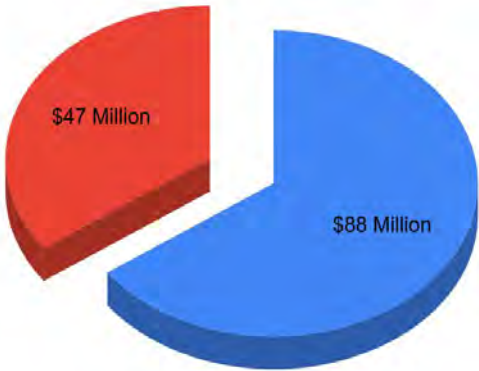
The current ratio declined from **2.63** to **1.87** but continues to indicate strong short-term financial capacity.

December 31, 2024



● Current Assets ● Current Liabilities

December 31, 2025



● Current Assets ● Current Liabilities

Moving to Work Expenditures

Project	Draws as of 12/31/25	
	HUD-Held Funds	Capital Fund Program
Public Housing Operating Shortfall	\$2,057,668	\$1,719,713
Investment in MTW Units at Tax Credit/AHC Properties:		
Amara Apartments Acquisition	\$27,354,369	
Artisan at Creekside Apartments Acquisition	\$1,531,941	
Community Development Initiatives	\$1,004,044	
Investment for City Bond Matching Funds:		
Midcrowne - Housing Bond Rehab	\$86,125	
Total	\$32,034,147	\$1,719,713

Questions?

2026 Legislative and Regulatory Priorities

Funding Priorities

For FY 2027

- Prioritize Adequate and Responsible Funding to Solve Our Housing Crisis
- Fully fund the Public Housing Operating Fund
- Fully fund the Public Housing Capital Fund backlog
- Increase Housing Choice Voucher (HCV) program funding



Regulatory Priorities

- Support self-sufficiency programs
- Limit regulations that decrease efficiencies of programs
- Increase flexibility in HCV's Housing Assistance Payments (HAP) funding
- Exemptions from Build America, Buy America



Legislation in the 119th Congress



Senate Bill 2651

ROAD to Housing Act

- Increases housing supply and reduces red tape
- Status: May possibly be conferenced (joined) with H.R. 6644.

H.R. 6644

Housing for the 21st Century Act

- Expands housing supply, modernizes HOME, and streamlines requirements
- Status: Passed in the House on Feb. 9th
- Now will go to the Senate



Next Steps

- Community Project Funding (CPF)
- Identifying funding opportunities with federal, state, and Congressional offices
- Continued, unified outreach with Congress, HUD, and partner organizations

Questions?

MEMORANDUM

To: Board of Commissioners

From: Michael Reyes, President and CEO

Presented by: George Ayala, Director of Procurement

RE: Procurement Activity Report

Initial
MR

SUMMARY:**CURRENT SOLICITATIONS:**

There are four Invitation for Bids (IFB) and one Request for Proposals (RFP) currently being advertised. The IFBs are for pool maintenance and repair services, natural gas system inspection, patrols, and reporting, central office roof replacement, and abatement and demolition of Woodhill Apartments (Building 16). The RFP is for event planning and management services.

CLOSED/PENDING SOLICITATIONS:

There are four solicitations that have closed and are currently being evaluated. The solicitations are for energy audit and utility allowance study, consulting services for managed care organizations, Midcrown Pavilion Apartment Homes interior and exterior improvements, and pest control for Affordable Housing Communities.

SOLICITATIONS IN DEVELOPMENT:

Procurement is currently working on several advertisement solicitations. These include: development initiative consulting services, chimney cleaning, inspection, and repair, mowing and grounds maintenance for Affordable Housing Communities, Pecan Hill Apartment roof replacement, public relations consulting services, general contracting services for EPC III, home energy rater services for Hemisview, Highview/Linda Lou reroofing and window replacement, natural gas operator qualification training, commercial property management, human resources remodel, retaining wall, backfill, and flower bend installation at Central Office, compensation software, retirement plan investment advisory services, resident portal with mobile application, cell tower lease consultant, lead abatement at Alazan, closed loop systems water treatment, UPCS Inspection services, on call real estate appraisal services, disaster restoration services, laundry concessions, irrigation services, and inspection, evaluation, repair, and/or stabilization of foundations.

PROPOSED ACTION:

None at this time.

STRATEGIC OUTCOMES:

Supports all strategic outcomes

Procurement Activity Report as of February 4, 2026

Solicitations Currently being Advertised

Opportunity	Home Department	Type	Solicitation Name	Bidders Conference	Closes
Communications and Public Affairs		RFP	Event Planning and Management Services	N/A	02/20/2026
Affordable Housing Communities		IFB	Pool Maintenance and Repair Services	N/A	02/26/2025
Capital Projects		IFB	Natural Gas System Inspection, Patrols, and Reporting	N/A	03/06/2025
General Services		IFB	Central Office Roof Replacement	02/23/2026	03/10/2026
Capital Projects		IFB	Abatement and Demolition of Woodhill Apartments (Building 16)	02/24/2026	03/12/2026

Board Items

No items will be presented at the March 4, 2026 Regular Board Meeting

Date Closed

Regular Board Meeting
March 4, 2026

Solicitations Under Evaluation

Capital Projects	RFP	Energy Audit and Utility Allowance Study	12/4/2025	Procurement Negotiations, Due Diligence, and Evaluation
Federal Housing Programs	RFP	Consulting Services for Managed Care Organizations	12/4/2025	
Capital Projects	RFP	Midcrown Pavilion Apartment Homes Interior and Exterior Improvements	12/4/2025	
Affordable Housing Communities	RFP	Pest Control for Affordable Housing Communities	01/21/2026	

Future Solicitations

Anticipated Month of Release

Asset Management and Development Services and Neighborhood Revitalization	Development Initiative Consulting Services	April 2026
Affordable Housing Communities	Chimney Cleaning, Inspection, and Repair	April 2026
	Mowing & Grounds Maintenance for Affordable Housing Communities	April 2026
	Pecan Hill Apartment Roof Replacement	April 2026
Capital Projects	General Contracting Services for EPC III	April 2026
	Home Energy Rater Services for Hemisview	April 2026
	Highview/Linda Lou Re Roofing and Window Replacement	April 2026
	Natural Gas Operator Qualification Training	April 2026
Communications	Public Relations Consulting Services	April 2026
Executive	Commercial Property Management	Department Hold
General Services	Human Resources Remodel	April 2026
	Retaining Wall, Backfill, and Flower Bed Installation at Central Office	April 2026
Human Resources	Compensation Software	April 2026
	Retirement Plan Investment Advisory Services	April 2026
Innovative Technology	Resident Portal with Mobile Application	April 2026
Public Housing	Cell Tower Lease Consultant	April 2026
	Lead Abatement at Alazan	April 2026
	Closed Loop Systems Water Treatment	April 2026
	UPCS Inspection Services	April 2026
Real Estate and Development Services	On Call Real Estate Appraisal Services	April 2026
Risk Management	Disaster Restoration Services	April 2026
Organization Wide	Laundry Concessions	April 2026
	Irrigation Services	April 2026
	Inspection, Evaluation, Repair, and/or Stabilization of Foundations	April 2026

Categories of Procurements

Opportunity Home Department	Solicitation Name	Vendor	Amount	Date
Awards Under President and CEO Expanded Authority				
There are no awards under this category during the reporting period				
Awards Under Contracting Officer Authority				
Human Resources	Benefits Provider	McGriff, a Marsh & McLennan Agency LLC company	\$74,500.00	1/13/2025
Public Housing	Foundation Repairs and Stabilization for Cassiano homes	Alamo Hy-Tech Foundation, Inc.	\$40,440.00	1/31/2026
Development Services and Neighborhood Revitalization	Construction Monitoring Services	Hillman Consulting	\$79,620.00	2/6/2026
Communications	Videography Services	Innovative Multimedia Group, LLC dba The IMG Studio	\$100,000.00	2/6/2026
Housing Voucher Services	Nspire-V Inspection Mobile App	Emphasys	\$22,684.00	2/12/2026
IT Purchases (Utilizing Cooperative Purchasing Contracts and General Services Administration (GSA Federal Supply Schedules)				
Procurement	esourcing Platform	Euna Solutions	\$25,834.59	2/12/2026

														Affordability Classifications						Income Mix								
Project Name	District	Congressional District	State Senate District	State House District	County Precinct	Location	Housing Provider	Project Type	Financing	Board Approval Date	Targeted Dated	Total Dev Cost	Estimated Developer Fees	# Units	Income Based (LNT)	PBRA	PH	PBV	20%	30%	40%	50%	60%	70%	80%	Market	Affordable Units	
Future Development																												
Lincoln Courts	D1	D35	D26	D116	PCT 2	1315 N Elmendorf St, San Antonio, TX 78207	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
West Way	D1	D20	D26	D125	PCT 2	5627 Culebra, San Antonio, TX 78228	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
HB Gonzales	D7	D20	D26	D125	PCT 2	5811 Ingram Rd, San Antonio, TX 78228	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
Tarry Towne	D1	D20	D26	D116	PCT 2	315 Vance Jackson Rd, San Antonio, TX 78201	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
Villa Hermosa	D1	D20	D26	D123	PCT 2	327 N Flores St, San Antonio, TX 78205	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
Marie McGuire	D1	D20	D26	D123	PCT 4	211 N Alamo St, San Antonio, TX 78205	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
Total												\$0	\$0	0	0	0	0	0	0	0	0	0	0	0	0	0	TBD	
Board Consideration											Targeted Construction Date																	
Quantum Drive	D4	D20	D19	D117	PCT 1	Southwest Corner of the Intersection of Quantum Drive and SW Loop 410, San Antonio, Texas 78242	Dominium	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$151,806,908	TBD	400	0	0	0	0	0	40	0	0	275	85	0	0	400	
Total												\$151,806,908	\$0	400	0	0	0	0	0	40	0	0	275	85	0	0	400	
Board Approved - Bond Inducement,Developer - Potential Partnership, Acquisition											Anticipated Partnership Agreement																	
Canyon Golf Apartments	D9	D9	D21	D121	PCT 3	NWC Canyon Golf & Stone Oak Pkwy 2802 Cinema Ridge, San Antonio, TX 78238	Fulcrum Development	PFC-392	HUD 221(d)(4)	TBD	TBD	\$64,429,742	\$0	264	0	0	0	0	0	0	0	26	0	106	132	132		
La Ventana	D6	D20	D26	D125	PCT 2	5606 US Highway 87 E, San Antonio, TX 78222	Marcus Build	PFC-303	PFC	8/20/2024	8/6/2025	\$57,988,449	\$1,000,570	272	0	0	0	0	0	0	0	27	0	109	136	136		
Lakeside Lofts	D2	D35	D19	D120	PCT 4	5606 US Highway 87 E, San Antonio, TX 78222	The NRP Group	Tax Credit	4% Tax Credit & Bonds	4/2/2025	TBD	\$90,844,733	TBD	336	0	0	0	0	0	34	0	207	95	0	0	336		
Overlook	D9	D35	D19	D118	PCT 1	Overlook Parkway and U.S. Highway 281, San Antonio, Texas 19302 Babcock Rd San Antonio, Tx 78255	Fulcrum Development & LYND	PFC-392	HUD 221(d)(4)	TBD	TBD	\$79,125,364	\$0	360	0	0	0	0	0	0	0	36	0	144	180	180		
Summit at Crownridge	D8	D23	D19	D122	PCT 3	19302 Babcock Rd San Antonio, Tx 78255	Journeyman Group	PFC-392	HUD 221(d)(4)	TBD	TBD	\$62,945,003	\$0	299	0	0	0	0	0	0	0	30	0	120	149	150		
Victoria Commons - North/South Pond	D1	D20	D26	D123	PCT 1	North of 643 Mount Zion, San Antonio, TX 78210	Catellus Development Corporation	TBD	Essential Functions Bond	10/4/2023	07/2025	\$96,305,043	\$5,275,579	397	0	0	0	0	0	10	10	10	41	0	131	195	202	
Creekside at Lookout	D10	D35	D26	D118	PCT 4	15407 Lookout Rd, San Antonio, TX 78233	Athena Domain Inc	PFC-303	PFC	12-4-24	TBD	\$49,235,308	TBD	232	0	0	0	0	0	0	0	24	0	93	115	117		
Rio Crossing	D3	D35	D19	D119	PCT 4	3035 SE Loop 410, San Antonio, TX 78222	GDA Partners	Tax Credit	4% Tax Credit & Bonds	TBD	01/01/2026	\$75,962,942	\$6,480,000	288	0	0	0	0	0	0	0	288	0	0	0	288		
Rio Landing	D4	D35	D19	D124	PCT 1	6435 W Military Dr, San Antonio, TX 78227	GDA Partners	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$75,468,271	\$6,480,000	288	0	0	0	0	0	0	0	288	0	0	0	288		
Homestead	D4	D35	D19	D117	PCT 1	5800 Medina Base Rd, San Antonio, TX 78242	TBD	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$91,731,632	\$11,378,925	324	0	0	0	0	0	0	0	108	108	108	0	0	324	
Brickstone	D4	D35	D19	D117	PCT 1	9003 Somerset Road, San Antonio TX 78211	Kittle Properties	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$66,019,066	\$7,150,000	290	0	0	0	0	0	29	0	0	261	0	0	0	290	
Asipre at MLK	D2	D20	D26	D119	PCT 4	2502 Martin Luther King DrSan Antonio, TX 78203	The NRP Group	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$78,321,856	\$8,625,000	300	0	0	0	0	0	30	0	0	186	84	0	0	300	
NHH Culebra	D6	D20	D26	D124	PCT 1	7796 Culebra Rd San Antonio, Texas 78251	New Hope Housing	Tax Credit	9% Tax Credits	TBD	TBD	\$28,600,000	\$3,300,000	80	0	0	0	0	0	12	0	32	36	0	0	0	80	
Durrington Ridge	D9	D21	D25	D121	PCT 3	21915 US-281, San Antonio, TX 78258	Culver Investment Partners & Ascendant Capital Partners	PFC-392	PFC	TBD	TBD	\$81,413,401	TBD	398	0	0	0	0	0	0	0	10	39	0	150	199	199	
Nova	D8	D21	D26	D116	PCT 3	14200 Vance Jackson, San Antonio, TX 78249	Culver Investment Partners & Ascendant Capital Partners	PFC-392	PFC	TBD	TBD	\$61,224,897	N/A	412	0	0	0	0	0	0	0	11	41	0	154	206	206	
Total												\$1,059,615,707	\$49,690,074	4540	0	0	0	0	0	115	10	171	1,638	287	1,007	1,312	3,228	
Under Construction											Estimated Completion Date																	
Victoria Commons - Townhomes	D1	D20	D26	D123	PCT 1	Northeast of 643 Mount Zion, San Antonio, TX 78210	Catellus Development Corporation	Private Market	TBD	9/5/2019	10/2025	TBD	TBD	TBD	0	0	0	0	0	0	0	0	0	0	0	0	0	
Westside Reinvestment Initiative (WRI)	D5	D20	D26	D125	PCT 2	The Palmlake Subdivision	Opportunity Home San Antonio	Self Developed	Hope VI/Sale Proceeds/CoSA HOME Funds	3/1/2023	01/2027	\$4,775,795	\$0	25	0	0	0	0	0	0	0	5	0	20	0	25		
Riverbreeze	D4	D35	D19	D117	PCT 1	410 SW Loop and Palo Alto Road	Kittle Properties	Tax Credit	4% Tax Credit & Bonds	6/12/2024	5/2027	\$71,613,997	\$2,318,525	264	0	0	0	0	0	27	0	0	158	79	0	0	264	
Emberstone Apartments	D4	D35	D19	D118	PCT 1	14970 Watson Rd	Kittle Properties	Tax Credit	4% Tax Credit & Bonds	9/4/2024	5/2027	\$58,007,611	\$6,720,000	247	0	0	0	0	0	25	0	0	222	0	0	0	247	
Central at Commerce	D2	D20	D19	D120	PCT 4	1231 E Commerce St, San Antonio, TX 78205	Union Development LLC	Tax Credit	4% Tax Credit & Bonds	8/6/2025	TBD	\$82,028,116	TBD	279	0	0	0	0	0	42	0	31	67	139	0	0	279	
Total												\$216,425,519	\$9,038,525	815	0	0	0	0	0	94	0	31	452	218	20	0	815	
Stabilization/Lease-Up											Estimated Stabilization Date																	
Bristol at Somerset	D4	D35	D19	D118	PCT 1	12955 Fischer Rd., San Antonio, TX 78703	Louis Poppoon Development Consulting, LTD	Tax Credit	4% Tax Credit & Bonds	5/6/2021	09/2025	\$63,331,807	\$7,500,000	348	0	0	0	0	0	0	0	348	0	0	0	348		
Vista at Reed	D6	D20	D26	D124	PCT 1	8401 Reed Road, San Antonio, TX 78251	Atlantic Pacific Companies	Tax Credit	9% Tax Credits	12/6/2023	12/2025	\$22,000,248	\$721,544	56	0	0	0	0	2	4	0	13	36	0	0	1	55	
Snowden Road	D7	D20	D26	D116	PCT 2	7223 Snowden Road, San Antonio, TX 78240	Opportunity Home San Antonio	Self Developed (Tax Credit)	9% Tax Credits	9/7/2022	12/2025	\$33,180,953	\$2,196,751	135	0	0	0	0	0	14	0	54	67	0	0	0	135	
Palo Alto	D4	D35	D19	D118	PCT 1	9930 Poteet Jourdanton Freeway, San Antonio, TX 78224	Pathway MF, LLC	Tax Credit	4% Tax Credit/Bonds/HUD 221 (d)(4)	4/6/2022	12/2025	\$71,503,356	\$2,194,806	336	0	0	0	0	0	16	16	32	244	28	0	0	336	

Project Name	District	Congressional District	State Senate District	State House District	County Precinct	Location	Housing Provider	Project Type	Financing	Board Approval Date	Targeted Dated	Total Dev Cost	Estimated Developer Fees	# Units	Affordability Classifications								Income Mix								Market	Affordable Units		
															Income Based (LNT)	PBRA	PH	PBV	20%	30%	40%	50%	60%	70%	80%	40%	50%	60%	70%	80%				
Potranco	D4	D20	D26	D124	PCT 1	202 W Loop 1604 S, San Antonio, TX 78245	LYND	PFC	Conventional Loan	12/3/2020	12/2024	\$67,914,812	\$250,000	360	0	0	0	0	0	0	0	0	0	36	0	144	180			180				
Josephine	D1	D20	D26	D123	PCT 4	210 W Josephine St, San Antonio, TX 78212	LYND	PFC	Conventional Loan	8/13/2020	12/2025	\$75,058,518	\$250,000	260	0	0	0	0	0	0	0	0	26	0	104	130			130					
Total												\$332,989,694	\$13,113,101	1495	0	0	0	0	2	34	16	99	757	28	248	311			1,184					
Grand Total												\$1,760,837,828	\$71,841,701	7250	0	0	0	0	2	283	26	301	3122	618	1275	1623			5,627					
Bond Issuance Only														Bond Fee																				
(Flynn Meadows) Ingram Square	D7	D20	D26	D125	PCT 2	5901 Flynn Drive, San Antonio, TX 78228	Related Companies	Tax Credit	4% Tax Credit & Bonds	TBD	TBD	\$36,815,065	\$170,000	120	0	0	0	0	0	0	60	60	0	0	0	0			120					
Sacred Heart Villas Apartments	D5	D20	D26	D123	PCT 2	120 S. Trinity Street, San Antonio, Texas 78207	The Cesar Chavez Foundation	Tax Credit	4% Tax Credit & Bonds	10/9/2024	TBD	\$27,346,652	\$300,000	89	0	0	0	44	0	48	0	41	0	0	0	0			89					
Viento (Los Arcos)	D6	D35	D19	D118	PCT 1	10210 S Zarzamora St., SA, TX 78224	The NRP Group	Tax Credit	4% Tax Credit & Bonds	12/7/2022	N/A	\$77,006,348	\$460,000	324	0	0	0	0	0	49	0	0	162	113	0	0			324					
Total												\$141,168,065	\$930,000	533	0	0	0	44	0	97	60	101	162	113	0	0			533					
Converted/Acquired														Estimated Conv/Acquired Date																				
Horizon Pointe	D2	D20	D19	D120	PCT 4	2411 Woodlake Pkwy, Converse, TX 78109	Integrated Realty Group, Inc.	Tax Credit	4% Tax Credit/Bonds/HUD 221 (d)(4)	10/7/2021	12/2024	\$47,805,876	\$2,684,692	312	0	0	0	0	0	20	35	106	0	151	0	0			312					
Augusta Flats	D1	D20	D26	D123	PCT 4	714 McCullough Ave, San Antonio, TX 78215	LYND	PFC-392	PFC	9/17/2024	11/2024	\$51,044,450	\$250,000	260	0	0	0	0	0	0	0	23	0	107	130			130						
Seven07 Lofts (Copernicus)	D2	D35	D19	D120	PCT 4	707 SE Loop 410 Acc Rd, San Antonio, TX 78220	The NRP Group	Tax Credit	4% Tax Credit & Bonds	4/1/2021	07/2024	\$55,389,378	\$6,009,000	318	0	0	0	0	0	0	17	17	267	17	0	0			318					
100 Labor	D1	D20	D26	D123	PCT 1	110 Labor St, San Antonio, TX 78210	Franklin Development	Beacon Communities	HUD 221(d)(4)	6/4/2020	03/2025	\$53,973,515	\$3,318,932	213	0	44	0	0	0	0	0	0	0	0	0	0			0					
Frontera Crossing (Watson)	D4	D35	D19	D118	PCT 1	13139 Watson Rd, Von Ormy, TX 78073	The NRP Group	Tax Credit	4% Tax Credit & Bonds	4/1/2021	08/2024	\$60,567,278	\$6,803,000	348	0	0	0	0	0	0	18	18	294	18	0	0			348					
Amara	D8	D23	D25	D122	PCT 3	19327 Talavera Ridge San Antonio, TX 78257	Opportunity Home San Antonio	Aquisition	MTW & Essential Function Bonds	8/6/2025	09/2025	\$55,747,497	N/A	308	154	0	0	0	0	0	0	0	31	0	123	154			154					
The Baltazar (Fiesta Trails)	D8	D21	D26	D116	PCT 3	12055 W Interstate 10, San Antonio, Tx 78230	The NRP Group	Tax Credit	9% Tax Credits	3/1/2023	08/2025	\$21,112,430	\$425,000	60	0	0	0	0	0	18	0	12	30	0	0	0			60					
Vista at Silver Oaks	D9	D21	D26	D123	PCT 3	11333 Brazil Dr., San Antonio, TX 78213	Atlantic Pacific Companies	Tax Credit	9% Tax Credits	4/3/2023	09/2025	\$28,147,350	\$2,361,340	76	0	0	0	0	0	8	0	22	46	0	0	0			76					
Total												\$373,787,774	\$21,851,964	1,895	154	44	0	0	0	46	70	175	691	186	230	453			1,398					
3-year Carry Forward														Anticipated Partnership Agreement																				
Bristol at the Preserve (phase 1)	D4	D35	D19	D118	PCT 1	Southwest Corner of SH 16 and Watson Road	Louis Poppoon Development Consulting, LTD	Tax Credit	4% Tax Credit & Bonds	9/24/2024	TBD	\$88,600,000	\$9,100,000	348	0	0	0	0	0	52	0	0	174	122	0	0			348					
Bristol at the Preserve (phase 2)	D4	D35	D19	D118	PCT 1	Southwest Corner of SH 16 and Watson Road	Louis Poppoon Development Consulting, LTD	Tax Credit	4% Tax Credit & Bonds	9/24/2024	TBD	\$97,600,000	\$9,500,000	384	0	0	0	0	0	57	0	0	192	135	0	0			384					
Augustine @ Palo Alto Phase 1	D4	D35	D19	D118	PCT 1	Near SE corner of SH 16 and Loop 410	Louis Poppoon Development Consulting, LTD	Tax Credit	4% Tax Credit & Bonds	12/6/2023	05/2025	\$81,179,517	\$2,380,305	348	0	0	0	0	0	52	0	0	174	122	0	0			348					
Augustine @ Palo Alto Phase 2	D4	D35	D19	D118	PCT 1	Near SE corner of SH 16 and Loop 410	Louis Poppoon Development Consulting, LTD	Tax Credit	4% Tax Credit & Bonds	12/6/2023	08/2026	\$84,260,546	\$2,546,753	372	0	0	0	0	0	56	0	0	186	130	0	0			372					

3-year Carry Forward												
Development	Inducement	Bond Reservation	3-Yr Carryforward	MOU/GP	Final Approval	Financial Closing	Construction Start	Pre-Leasing	Construction Completion	Stabilization	Conversion/ Final Endorsement	Status
Augustine @ Palo Alto Phase 2	December 2023	January 2025	January 2025									Augustine Phase 1 & 2 are dead deals however LVPFC still has the 3 year Carryforward of bonds it may utilize for other projects.
Augustine @ Palo Alto Phase 1	December 2023	January 2025	January 2025									Augustine Phase 1 & 2 are dead deals however LVPFC still has the 3 year Carryforward of bonds it may utilize for other projects.
Bristol at the Preserve Phase 1	September 2024	January 2025	January 2025									Bristol Phase 1 & 2 are dead deals however LVPFC still has the 3 year Carryforward of bonds it may utilize for other projects.
Bristol at the Preserve Phase 2	September 2024	January 2025	January 2025									Bristol Phase 1 & 2 are dead deals however LVPFC still has the 3 year Carryforward of bonds it may utilize for other projects.

4% Tax Credit Deals											
Development	Inducement	Bond Reservation	3-Yr Carryforward	MOU/GP	Final Approval	Financial Closing	Construction Start	Pre-Leasing	Construction Completion	Stabilization	Conversion/ Final Endorsement
Horizon Pointe	February 2020	April 2021	April 1, 2021	February 2020	October 2021	October 2021	December 2021	January 2024	July 31, 2024	Sept-Nov 2024	December 2024
Frontera Crossing (Watson)	August 2020	April 2021	N/A	August 2020	April 2021	April 2021	May 2021	October 2023	April 2023	May-July 2024	August 2024
Seven07 Lofts (Copernicus)	August 2020	April 2021	N/A	August 2020	April 2021	April 2021	May 2021	October 2023	April 2023	May-July 2024	August 2024
Bristol at Somerset	October 2020	February 2021	N/A	October 2020	May 2021	August 2021	September 2021	June 2023	March 2024	August-October 2025	October 2025
Palo Alto	June 2021	December 2021	N/A	June 2021	April 2022	May 2022	May 2022	April 2025	June 2025		
Riverbreeze	June 2024	Dec 2024	N/A	March 2025	April 2025	April 2025	May 2025				
Lakeside Lofts	October 2024	June 2025	N/A	April 2025	April 2026	April 2026	May 2026				
Emberstone Apartments	October 2024	January 2025 & Returned	N/A	July 2025	October 2025	November 2025	December 2025				
Central at Commerce	October 2024	July 2025	N/A	August 2025	December 2025	January 2026	February 2026				
Sacred Heart Villas	October 2025	January 2026									
Flynn Meadows (Ingram Square)	October 2025	January 2026									
Homestead	October 2025	January 2026									
Brickstone	October 2025	February 2026									
Aspire at MLK	October 2025										
Rio Crossing	October 2025	February 2026									
Rio Landing	November 2025	February 2026									
Quantum Drive											

9% Tax Credit Deals										
Development	Tax Credit Application	Tax Credit Award	MOU/GP	Final Approval	Financial Closing	Construction Start	Pre-Leasing	Construction Completion	Stabilization	Conversion/ Final Endorsement
The Baltazar (Fiesta Trails)	February 2020	January 2023	February 2021	December 2022	July 2023	July 2023	November 2024	March 2025	May- July 2025	January 2026
Snowden Road	February 2021	September 2021	February 2021	September 2022	October 2022	October 2022	March 2024	May 2025	Oct-Dec 2025	
Vista at Silver Oaks	February 2022	July 2022	April 2023	April 2023	April 2023	April 2023	August 2024	March 2025	Sept - Nov 2025	November 2025
Vista at Reed	February 2023	August 2023	February 2023	December 2023	December 2023	January 2024	February 2025	July 2025	Sept- Nov 2025	
New Hope Housing Project	February 2026									

Non-LIHTC Deals												
Development	Board Approval MOU/GP	30-day Posting of Assessment	CoSA - PCDC	City Council	Final Approval	Financial Closing	Construction Start	Pre-Leasing	Construction Completion	Stabilization	Sale/Refi	Conversion
Josephine	August 2020	N/A	N/A	N/A	August 2020	December 2021	February 2022	January 2025	April 2025			
Potranco	December 2020	N/A	N/A	N/A	December 2020	March 31, 2022	April 2022	December 2023	April 2025	Nov-Jan		
Augusta Flats	September 2024	N/A	N/A	N/A	September 2024	November 2024	Acquisition of Existing	N/A	N/A	N/A		
La Ventana (303)	September 2024	January 2025	January 2025	February 2025	July 2025							
Summit at Crownridge (392)	March 2025	N/A	N/A	N/A	March 2025							
Canyon Golf Apartments (392)	March 2025	N/A	N/A	N/A	March 2025							
Overlook (392)	March 2025	N/A	N/A	N/A	March 2025							
Creekside Residents (303)	December 2024	March 2025	April 2025	May 2025	May 2025							
Victoria Commons - North/South Pond	October 2024	N/A	N/A	N/A								
Amara (392)	July 2025	N/A	N/A	N/A	August 2025	September 2025	Acquisition of Existing					
Presidio (392)	July 2025	N/A	N/A	N/A	July 2025	Dead Deal Dec 2025						
Durrington Ridge (392)	February 2026	N/A	N/A	N/A								
Nova (392)	February 2026	N/A	N/A	N/A	March 2026							