Annual **MTW PLAN**

Fiscal Year 2026-2027

July 1, 2026 to June 30, 2027

Formerly San Antonio Housing Authority

OPPORTUNITY HOME SAN ANTONIO

A COMMUNITY OF POSSIBILITIES

Document submission date:
MTW Plan DRAFT Released For Public Comment: February 18, 2026
MTW Plan DRAFT Submitted to HUD for review: April 14, 2026
Final MTW Plan Submitted to HUD for approval: July 1, 2026
Significant Amendment 1 Released for Public Comment: July 3, 2026
Significant Amendment 1 Submitted to HUD for approval: August 7, 2026
Final MTW Plan Approved by HUD: TBD

Section I | Introduction

Section I. A. | Table of Contents

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

Opportunity Home San Antonio provides housing to over 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 reaches 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 Statemen**t: The San Antonio area has a high quality of life where all are thriving -- starting with Opportunity Home residents.
- **Values:** The Organization has adopted a set of core values.
    - **Equity**: Opportunity Home delivers services in a manner that creates fair outcomes, not just equal opportunities. Equity ensures that systems -- policies, programs, and rules -- do not create unfair results.
    - **Compassion**: Opportunity Home delivers services in a manner that relieves suffering and improves the quality of life of residents.
    - **Excellence**: Opportunity Home delivers services in a manner that sets high

standards and improves continuously.

Long-term 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: Provide quality, affordable housing by preserving, developing, acquiring and financing at least 14,500 affordable units across a diverse portfolio of housing options, ensuring long-term affordability and stability for residents throughout the San Antonio area.
- Opportunities: Create opportunities that build collaborative partnerships, support residents, engage stakeholders and contribute to the strength of the broader community.
- Innovation: Enhance innovation and learning that continually elevate the quality of our service.

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	POPULATION TYPE**	Section 504 Accessible 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: Public Housing Units to be Removed in the Plan Year	**499**	

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: Planned new Project Based Units in Plan Year	**50**		

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: Planned Existing Project-Based Vouchers	**362**			

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	1,100,000	Inspector Salaries, Environmental Reviews, PNA, other misc. uses
PHA Wide	9,550,000	Repositioning Funding
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	**$47,458,671**	

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
Local, Non-Traditional: Tenant-Based^	0	0
Local, Non-Traditional: Property-Based^	29,880	2,490
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	PBV Site-based	2,726	Closed	No

Project-Based Vouchers				
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.

This activity would also promote economic self-sufficiency of work-able households.

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 $33,000 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.

FY2026-2 | Local Project-Based Voucher Subsidy for Tax Credit Developments

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity -

Through this activity, Opportunity Home will make changes to the TTP calculation to create one that is based upon income bands, applying a flat TTP within each income band instead of basing the calculation of TTP on gross or adjusted income. This proposed activity is similar to the "Income Bands" activity described in the "MTW Waivers" appendix of the draft Operations Notice for the Expansion of the Moving to Work Demonstration Program published by HUD in the Federal Register on October 11, 2018. Additionally, Opportunity Home will modify the housing authority subsidy calculation to provide a fixed flat subsidy. The activity may apply to the following RAD-PBV units at multiple mixed-income developments and future units predicated on each transaction's needs. The activity will not apply to any RAD household exercising the right of first return.

Projected potential units are as follows;

- **Creekside** (152 units)
- **San Juan I** (66 units)
- **San Juan II** (69 units)
- **Monterrey Park** (112 units)
- **La Providencia** (90 units)

• TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.

• Contract rents will be capped at 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size.. Contract rents may be increased through an increase to the TDHCA-published Tax Credit rents.

• The Housing Assistance Payment (HAP) subsidy will be the difference between the contract rent and the TTP minus a utility allowance if the resident pays their own utilities. Payment of the

HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard RAD-PBV HAP contract.

ii. Describe how the activity will achieve one or more of the 3 statutory objectives and the specific impacts on that objective -
This activity will achieve the statutory objective of increasing housing choice for low-income families. By stabilizing rent revenue and standardizing the subsidy schedule, Opportunity Home can leverage higher permanent debt proceeds to insert units at various mixed-income communities. This addition would create financial viability, bringing 489 units online that could otherwise face financing gaps.

iii. Provide the anticipated schedule for implementing the proposed activity -
After approval of the Plan to include this activity, the activity would be placed in use as needed during conversion processes and Restore-Rebuild transactions in accordance with HUD guidelines.

iv. Specify if the PHA plans to apply this activity to any SPV types -
This activity will not apply to any Special Purpose Vouchers (SPV's).

B. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications for the PHA -
This activity will help to regulate the cost of housing subsidies for project-based voucher units by fixing the subsidy amount at the amount received from HUD for RAD PBV units. In a traditional project-based voucher unit, the contract rent is established based on the rental price of comparable market-rate units, and the housing assistance payment (HAP) is the difference between the contract rent amount and 30% of the tenant's adjusted monthly income. Through this activity, the TTP is set at the applicable tax credit affordable rent and the Opportunity Home subsidy is a fixed amount based upon the RAD CHAP.

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 -
This activity is designed to be HAP-neutral or provide a minor, predictable cost-savings surplus by decoupling the agency's financial obligation from fluctuating tenant incomes. By fixing the subsidy to the RAD CHAP, Opportunity Home eliminates the risk of unexpected HAP spikes at these locations. Any minor surplus generated by this tracking efficiency will be restricted to the MTW block grant and reinvested into local affordable housing preservation or physical development activities under the Restore-Rebuild framework.

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 -
Opportunity Home requests authority to waive the following statutes and regulations to undertake this proposed activity:

- Sections 8(o)(2)(A)-(C) of the 1937 Housing Act
- 24 CFR §5.628
- *Attachment C, Section D.2 (Rent Reform and TTP Alternative Calculations) and Section D.7 (Establishment of alternative Project-Based Voucher arrangements).*

ii. Explain why the cited authorization(s) is needed to engage in the proposed activity -
Establishment of the fixed flat subsidy is integral to creating and sustaining affordable housing. By simplifying and reassuring bank underwriters with consistent rent revenues, it allows for increased permanent loan sizes for new construction. This strategy not only solves critical financial "gaps" to ensure projects proceed, but also stabilizes Housing Assistance Payment (HAP) costs, providing necessary cost savings that further support our development pipeline. This authorization will permit Opportunity Home to apply the alternative TTP and HAP subsidy determination methods described in section A of this activity.

D. RENT REFORM INFORMATION

i. Impact Analysis -
Because this activity applies strictly to units coming online under the Restore-Rebuild framework, there are no historical baseline metrics or current residents to analyze for negative rent burdens. Families moving into these units will do so voluntarily with prior knowledge of the flat tax-credit rent bands. The clear tiering of income bands ensures that families avoid the "cliff effect," meaning incremental income increases will not trigger immediate, punitive rent increases.

ii. Hardship Case Criteria -
Opportunity Home may establish a standard hardship waiver policy for this activity. If an eligible household experiences an involuntary loss of income (such as loss of employment or a change in household composition) that places their flat TTP above 40% of their adjusted monthly income, the family may request a hardship review. Upon verification, Opportunity Home may temporarily transition the household to a traditional income-based rent calculation (30% of adjusted monthly income) for up to 90 days, renewable upon continuous verification of financial hardship.

iii. Description of Annual Reevaluation -
Opportunity Home will annually review this activity's performance to determine whether the activity is meeting its objective of stabilizing HAP costs while ensuring that the rents are

affordable to low-income households. Based on that review, the activity may be modified as necessary to meet its objectives.

iv. Transition Period -

Not applicable. This activity will apply only to Restore-Rebuild units; therefore, there is no impact to existing residents.

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	$13,541,092.00
70600	HUD PHA Operating Grants	$178,734,554.00
70610	Capital Grants	$11,900,000.00
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$0.00
71100+72000	Interest Income	$657,414.00
71600	Gain or Loss on Sale of Capital Assets	$2,916.00
71200+71300+71310+71400+71500	Other Income	$2,126,642.00
70000	**Total Revenue**	**$206,962,618.00**

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	$21,775,808.00
91300+91310+92000	Management Fee Expense	$10,635,310.00
91810	Allocated Overhead	$0.00
92500 (92100+92200+92300+92400)	Total Tenant Services	$3,010,523.00
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$7,009,111.00

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
93500+93700	Labor	$0.00
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$24,535,945.00
95000 (95100+95200+95300+95500)	Total Protective Services	$887,194.00
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$3,714,694.00
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$3,763,634.00
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	$385,258.00
97100+97200	Total Extraordinary Maintenance	$0.00
97300+97350	HAP + HAP Portability-In	$120,833,137.00
97400	Depreciation Expense	$8,666,930.00
97500+97600+97700+97800	All Other Expense	$0.00
90000	**Total Expenses**	**$205,217,544.00**

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

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

MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as "MTW Funding." The MTW PHA shall provide a thorough narrative of planned activities it plans to undertake using its unspent MTW Funding. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (III) or Section (IV) of the Annual MTW Plan. The MTW PHA shall also provide a thorough description of how it plans to use MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

PLANNED APPLICATION OF MTW FUNDING FLEXIBILITY

Below are specific program uses of the MTW 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.
- 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*	$8.9 million	$8.9 million
HCV Admin Fee	$5.7 million	$5.7 million
PH Operating Subsidy	($4.9 million)	($4.9 million)
HUD-Held HCV Funds	$28 million	$28 million
TOTAL:	**$37.7 million**	**$37.7 million**

Description
Per Board Resolution 6936 dated June 3, 2026, Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

Sources:

- MTW Funds- $37.3 million

Uses:

- Public Housing operating shortfall - $9.2 million
- Community Development Initiatives Operating shortfall - $2.0 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 - $17.5 million
- Investment in MTW units at Tax Credit/ Affordable Housing Communities Properties - $4.0 million
- Investment in Midcrowne and Ravello Properties - $5.0 million

Total MTW funds obligated is $37.3 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 - General Information**

Section VI | Administrative

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

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

Docusign Envelope ID: 42AC20FA-1E5C-4171-9B60-B6C0AC4B5E36

OPPORTUNITY HOME SAN ANTONIO **April 1, 2026**

BOARD OF COMMISSIONERS
Regular Board Meeting

RESOLUTION 6921, AUTHORIZING 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), CAPITAL FUND PROGRAM PLAN, FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

Signed by: Michael Reyes	DocuSigned by: Nicholas Tennessee
22A0F1EFD4A4479	43B9C349880641 9...
Michael Reyes	**Nicholas Tennessee**
President and CEO	MTW and Strategy Analyst

REQUESTED ACTION:
Consideration and approval regarding Resolution 6921, authorizing 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), Capital Fund Program Plan, Five-Year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan.

SUMMARY:
The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to submit an annual five-year plan and business plan, 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 Policty (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)

Page 10 of 361

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 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 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 Policy (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)and(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)and(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**
  - **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 all household members are strictly prohibited from duplicating or providing access devices to any guest or non-resident without management approval. 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 the 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).

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.
  - (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

STRATEGIC OUTCOMES:
Supports all strategic outcomes.

ATTACHMENTS:
Resolution 6921
FY27 MTW Plan
Public Comment Summary Slides

Opportunity Home San Antonio
Resolution 6921

RESOLUTION 6921, AUTHORIZING 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), CAPITAL FUND PROGRAM PLAN, FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN, AND THE FAMILY SELF-SUFFICIENCY (FSS) PROGRAM ACTION PLAN

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio, a public instrumentality created pursuant to the laws of the State of Texas must approve the 2026-2027 Moving to Work (MTW) Agency Plan for fiscal year 2026-2027, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan, and the Family Self-Sufficiency (FSS) Program Action plan; and

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio also desires to authorize the submission of the 2026-2027 MTW Agency Plan to the U.S. Department of Housing and Urban Development ("HUD"); and

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

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

1) Approves Resolution 6921, authorizing 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), Capital Fund Program Plan, five-year Capital Improvement and Development Plan, and the Family Self-Sufficiency (FSS) Program Action Plan; and

2) Authorizes the President and CEO or designee to execute all necessary documents and extensions for the submission of the 2026-2027 MTW Plan to HUD.

Passed and approved this 1st day of April 2026.

Estrellita Garcia-Diaz
Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes
President and CEO

OMB Approval No. 2577-0216 (exp. 08/31/2027)

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING
Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2026), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d-1), the Fair Housing Act (42 USC 3601 et seq.), section 504 of the Rehabilitation Act of 1973 (29 USC 794), title II of the Americans with Disabilities Act of 1990 (42 USC 12131 et seq.), the Violence Against Women Act (34 USC 12291 et seq.), all regulations implementing these authorities; and other applicable Federal, State, and local fair housing and civil rights laws.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies, for the PHA's jurisdiction and a description of the way the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).

(7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws (24 CFR 5.151). The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity),will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment,31 U.S.C. § 1352.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 2 CFR 200.334 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), as applicable.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA and should be made available electronically, upon request.

Opportunity Home San Antonio	TX006
MTW PHA NAME	***MTW PHA NUMBER/PHA CODE***

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

Michael Reyes	President & CEO
NAME OF AUTHORIZED OFFICIAL	***TITLE***
Signed by: Michael Reyes 03A0F1EEDAA1479...	4/2/2026
SIGNATURE	***DATE***

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

FY27 MTW Plan Amendment:

Docusign Envelope ID: 3AFC817E-501B-82A0-80D5-9B7085772EE5

Opportunity Home San Antonio
Resolution 6963

RESOLUTION 6963, AUTHORIZING THE PROPOSED 2026-2027 MOVING TO WORK (MTW) AGENCY PLAN AMENDMENT, INCLUDING REVISIONS TO THE MTW PLAN, AND REVISIONS TO APPENDIX I

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio, a public instrumentality created pursuant to the laws of the State of Texas, must approve the 2026-2027 Moving to Work (MTW) Agency Plan Amendment for fiscal year 2026-2027, including one proposed MTW activity, and the revision to Appendix I; and

WHEREAS, the Board of Commissioners of Opportunity Home San Antonio also desires to authorize the submission of the 2026-2027 MTW Agency Plan Amendment to the U.S. Department of Housing and Urban Development ("HUD"); and

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

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

1) Approves Resolution 6963, authorizing the proposed 2026-2027 Moving To Work (MTW) Agency plan Amendment, including revisions to the MTW Plan, and revisions to Appendix I.

2) Authorizes the President and CEO or designee to execute all necessary documents and extensions for the submission of the 2026-2027 MTW Plan Amendment to HUD.

Passed and approved this 5th day of August 2026.

Estrellita Garcia-Diaz
Chair, Board of Commissioners

Attested and approved as to form:

Michael Reyes
President and CEO

Page 23 of 119

OPPORTUNITY HOME SAN ANTONIO **August 5, 2026**

BOARD OF COMMISSIONERS
Regular Board Meeting

RESOLUTION 6963, AUTHORIZING THE PROPOSED 2026-2027 MOVING TO WORK (MTW) AGENCY PLAN AMENDMENT, INCLUDING REVISIONS TO THE MTW PLAN, AND REVISIONS TO APPENDIX I

Signed by: Michael Reyes
33A0F1EED7AA1479...

DocuSigned by: Nicholas Tennessee
43B9C3498806419...

Michael Reyes
President and CEO

Nicholas Tennessee
MTW and Strategy Analyst

REQUESTED ACTION:
Consideration and approval regarding Resolution 6963, authorizing the proposed 2026-2027 Moving To Work (MTW) Agency plan Amendment, including revisions to the MTW Plan, and revisions to Appendix I.

SUMMARY:
The U.S. Department of Housing and Urban Development (HUD) requires Public Housing Authorities (PHAs) to submit an annual five-year plan and business plan, 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. When significant changes occur after submission of an annual MTW Plan, but before the next Plan begins drafting, Opportunity Home is required to create an amendment to the current FY MTW Plan to adopt these changes. This amendment requires an additional 30-day public comment period and Board approval before submission to HUD.

Opportunity Home submitted the FY27 MTW Plan to HUD on April 14, 2026. After submission of this Plan, two critical updates needed to be made to allow our Agency to move strategic initiatives forward:

Proposed changes to the current FY27 MTW Plan:

- 1 MTW Activity is being proposed
    - 2026-2 | Local Project-Based Voucher Subsidy for Tax Credit Developments
        - This activity will create an alternative flat-subsidy structure for Opportunity Home's mixed-income properties to support HUD's "Restore-Rebuild" Initiative.
- Appendix I - Repositioning
    - Opportunity Home is adding 1 Public Housing property to Appendix I to apply for conversion in FY27
        - Henry B. Gonzalez - 51 units

The "Restore-Rebuild" initiative (historically known at the federal level as **"Faircloth-to-RAD"**) is a specialized regulatory framework designed by HUD. It allows public housing authorities to restore affordable housing subsidies lost during prior redevelopment of public housing. The regulation allows these deeply subsidized affordable housing units to match their maximum historical funding capacity.

Under this framework, agencies can bring new deeply subsidized rental units online by immediately placing them under long-term Project-Based Voucher (PBV) rental assistance contracts inside modern, mixed-income apartment communities.

For decades, public housing authorities across the country faced a massive legislative bottleneck caused by two primary factors:

- **The Faircloth Limit (1999):** In 1999, an amendment to the Housing Act established a strict statutory cap (the Faircloth Limit) preventing housing authorities from operating more public housing units than they had in service as of October 1, 1999.
- **The Funding and Capital Deficit:** As federal capital fund allocations shrank, older public housing projects faced mounting repair deficits, forcing agencies to demolish or dispose of severely distressed buildings. When these units were demolished, the agency's *active* housing footprint dropped below its 1999 limit, creating a reservoir of "eligible but unbuilt" units that could not be financed under traditional public housing development programs.

On May 12, 2026, HUD effectively ended the Restore-Rebuild initiative, and in advance of the suspension, Opportunity Home submitted Notices of Anticipated RAD Rent (NARR) requests for several owned and managed mixed-income properties. Opportunity Home is leveraging this activity to aggressively recapture units available from the historical unit capacity before the operational wind-down of new federal pipeline applications takes effect.

To make these specific units successful, the proposed MTW activity addresses a critical real-world development hurdle:

- **The MTW Waiver Solution:** By using our MTW flexibility to set up flat, standardized tenant rent bands tied directly to predictable housing authority subsidies (indexed to the RAD CHAP), Opportunity Home completely stabilizes the property's revenue model. This predictability allows bank underwriters to comfortably verify consistent rent revenues, giving Opportunity Home the power to secure significantly higher private construction loans. This extra capital fills the remaining "financing gaps," ensuring the new apartment units can successfully proceed from on-hold to active.

MTW TIMELINE

- April 14, 2026: FY27 MTW Plan submitted to HUD
- July 3, 2026: FY27 MTW Plan Amendment drafted and posted for public comment. Comment period ended August 2, 2026.
- August 5, 2026: Consideration and approval by the Board of Commissioners and submission to HUD
- October: FY28 MTW Planning begins

STRATEGIC OUTCOMES:

Supports all strategic outcomes.

ATTACHMENTS:
Resolution 6963
FY27 MTW Plan Amendment
Slides

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's Central Office, 818 S Flores St., San Antonio, TX, 78204 prior to 2:00 p.m., commencing on March 4, 2026. There were zero (0) public comments.

See Appendix A for more information including resident consultation dates, locations, and attendance.

FY27 MTW Plan Amendment:

A 30-day public comment period began on Friday, July 3, 2026, and ended on Sunday, Aug. 2, 2026, on the Opportunity Home San Antonio's Proposed 2026 – 2027 Moving to Work Agency Plan Significant Amendment.

A Public Hearing was held at Opportunity Home's Central Office, 818 S Flores St., San Antonio, TX, 78204 prior to 5:00 p.m., commencing on July 21, 2026. There were fifteen (15) attendees. There were zero (0) public comments.

See Appendix A for more information including resident consultation dates, locations, and attendance.

OPPORTUNITY HOME SAN ANTONIO
A COMMUNITY OF POSSIBILITIES

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

PRESIDENT & CEO
Michael Reyes

OPPORTUNITY HOME SAN ANTONIO | PUBLIC HEARING

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.

IN-PERSON
Opportunity Home Central Office
818 S Flores St
San Antonio, TX 78204

PROPOSED 2026-2027 MOVING TO WORK AGENCY PLAN

1. Introduction and Background (Nicholas Tennessee, MTW & Strategy Analyst)

2. Proposed 2026-2027 Moving to Work Agency Plan (Nicholas Tennessee, MTW & Strategy Analyst)

   - Moving to Work Plan
   - Public Housing Admissions and Continued Occupancy Plan
   - Housing Choice Voucher Administrative Plan
   - Capital Fund Program Plan
   - Family Self-Sufficiency (FSS) Program Action Plan

3. Public Comments/Feedback

   A 30-day public comment period began on Tuesday, February 18, 2026, and ends 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, 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.

4. Summary and Next Steps (Nicholas Tennessee, MTW & Strategy Analyst)

Posted on: 02/17/2026 5:00 PM

OPPORTUNITY HOME SAN ANTONIO
A COMMUNITY OF POSSIBILITIES

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

OPPORTUNITY HOME SAN ANTONIO | PUBLIC HEARING

4:00 p.m. | Tuesday | July 21, 2026

IN-PERSON
Opportunity Home Central Office
818 S Flores St
San Antonio, TX 78204

PROPOSED 2026-2027 MOVING TO WORK AGENCY PLAN AMENDMENT

1. Proposed 2026-2027 Moving to Work Agency Plan Amendment (Nicholas Tennessee, MTW & Strategy Analyst)
   - Moving to Work Plan Amendment Changes
2. Public Comments/Feedback

   A 30-day public comment period began on Thursday, July 2, 2026, and ends on Sunday, August 2, 2026, on the Opportunity Home San Antonio's Proposed 2026 – 2027 Moving to Work Agency Plan Amendment.

   Comments on changes may be delivered by electronic mail to mtw@homesa.org. All comments are due by 5:00 pm on August 2, 2026.

Posted on: 07/02/2026 5:00 PM

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.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013
Expiration Date: 06/30/2028

Review Public Burden Disclosure Statement

1. * Type of Federal Action:
- [ ] a. contract
- [x] b. grant
- [ ] c. cooperative agreement
- [ ] d. loan
- [ ] e. loan guarantee
- [ ] f. loan insurance

2. * Status of Federal Action:
- [ ] a. bid/offer/application
- [x] b. initial award
- [ ] c. post-award

3. * Report Type:
- [x] a. initial filing
- [ ] b. material change

4. Name and Address of Reporting Entity:
- [x] Prime
- [ ] SubAwardee

* Name: Opportunity Home San Antonio
* Street 1: 818 S Flores St
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/PIH

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: N/A Middle Name:
* Last Name: N/A Suffix:
* Street 1: Street 2:
* City: State: Zip:

b. Individual Performing Services (including address if different from No. 10a)

Prefix: * First Name: N/A Middle Name:
* Last Name: N/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.

Signed by:

*** Signature:** Michael Reyes

33A0F1EEDAA1479...

***Name:** Prefix: * First Name: Michael Middle Name:
* Last Name: Reyes Suffix:

Title: President & CEO **Telephone No.:** 210.477.6130 **Date:** 4/2/2026

Federal Use Only:

Authorized for Local Reproduction
Standard Form - LLL (Rev. 7-97)

OMB Approval No. 2577-0157 (Exp. 1/31/2027)

Certification of Payments to Influence Federal Transactions

U.S. 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 funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Officer, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, 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	Title
Michael Reyes	President & CEO

Signature	Date (mm/dd/yyyy)
Signed by: Michael Reyes 33A0F1EEDAA1479...	4/2/2026

Previous edition is obsolete

form HUD 50071 (01/14)

Appendix | Additional Items

Appendix A | Public Comments Summary Report

MTW Timeline:

Date	Description	Outreach	Attendance
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	2 residents
March 4, 2026	Public Hearing - Board of Commissioners	Website posting	No comments
March 5, 2026	Public Housing Resident Briefing (Madonna)	Email, property flyers, website	0 residents
March 10, 2026	Public Housing Resident Briefing (OP Schnabel)	Email, property flyers, website	5 residents
March 12, 2026	Public Housing Resident Briefing (Fair Ave)	Email, property flyers, website	23 residents
March 13, 2026	HCV Resident Briefing	Email, website	7 attendees
March 20, 2026	Comment period closed		
April 1, 2026	Final Board Approval		
April 14, 2026	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 public comments are copied verbatim from email and/or physical comment cards. 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. There were a total of 49 comments made during the public comment period.

Some comments were received in the form of a document and the document link is attached in the line item. Please email mtw@homesa.org for assistance accessing links.

Public Comment	Adjustments to Plan (if any)
Regarding PH Lease revision - recording on property: Texas is a 1 party consent state, a RAB member felt that recording is needed when documenting staff who say one thing then state they never said certain things.	Policy removed.
Regarding PH Lease revision - recording on property: Texas is a 1 party consent state, a Board Commissioner felt that recording is needed for residents and restricting it is counterproductive to the safety and wellbeing of residents.	Policy removed.
I am submitting this public comment regarding the proposal being considered by Opportunity Home San Antonio to convert Section 9 public housing into project-based voucher programs. Public housing exists to provide stable, affordable housing for families who are already facing financial hardship. Many of the residents we work with through community outreach depend on public housing as a foundation for stability while they work, raise their children, and try to improve their circumstances. Converting traditional public housing into other housing models could create uncertainty and fear among residents who rely on these homes. Through my work in the community, I have seen firsthand how important stable housing is for families, children, seniors, and individuals working to rebuild their lives. Public housing should remain public and protected so that residents are not displaced or placed into situations where housing becomes less stable or more difficult to access. I respectfully urge Opportunity Home San Antonio to carefully consider the voices of the residents who live in these communities and the organizations that advocate for	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

them. Any policy decisions regarding public housing should prioritize transparency, resident input, and long-term housing stability for the families who depend on these homes. Our community deserves housing policies that strengthen neighborhoods and protect vulnerable residents. As a community leader and advocate, I strongly encourage Opportunity Home to ensure that public housing remains a reliable and secure resource for the people of San Antonio.	
I think that if we are faithful in the little things that are our responsibility like throwing our trash in the trash can we will have a healthy pride and be happy which will help us become stronger so that we are able to fulfill bigger responsibilities and be self sufficient.	N/A
I am writing in support of the Opportunity Home's plant to convert public housing to projects-based vouchers through the Rental Assistance Demonstration (RAD) Program. Public housing concentrates theft, abuse, drug related crimes, etc. Gentrification and the increase in the value of homes in the surrounding area is limited if it doesn't plummet. It is proven that integration is the key to societal improvement and advancement. Segregating the poor, destitute to a certain area limits their scope. These "public housing" areas become the lepers of society. They are either ignored or looked upon with disdain. Please PRIVATIZE housing and allow vouchers so that those in need can live in a decent neighborhood and not be seen as a burden to society. Allow people a choice as to where they want to live. Otherwise, we will continue to push ourselves into a world of the "have and have nots". YES to projects-based vouchers!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I am writing to express my strong opposition to Opportunity Home's plan to convert public housing units to project-based vouchers through the Rental Assistance Demonstration	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion

(RAD) Program. Public housing is one of the most deeply affordable housing options available in San Antonio and plays a critical role in keeping families, seniors, and people with disabilities stably housed. Even for those who do not live in public housing, its preservation is essential to maintaining an affordable and equitable housing system in our city. I urge Opportunity Home to keep public housing public.	commencement in FY27 after all required HUD steps have been followed.
I am writing in regard to the following MTW Proposed Changes. These changes are ill-advised and will almost certainly lead to increased tenant reliance on predatory lending, and, subsequently, on displacement and houselessness. If the purpose of these proposals, and your organization, is to increase the already large population of San Antonio houseless individuals, these proposed changes are well on their way toward doing so. RAD(Rental Assistance Demonstration) conversion of all Public Housing. This would be combined with Section 18-demolition to convert all public housing to section 8 project based vouchers. It means less tenant protections, higher tenant cost and the ability for the housing authority to take on debt, like loans/mortgages, against the housing stock that can put that housing at risk of foreclosure or the need to sell if in the negative. Whereas public housing is owned outright and has no debt, and is permanently affordable. Proposed lease revision-restriction of flyers or written materials unless approved by staff, restriction of unauthorized door to door knocking except by Resident Council. This would ban the ability of tenants not part of the resident council and allied organizations to help tenants organize at their property, a federally protected practice as outlined in the Housing Act of 1937, 24 CFR 245 for section 8 and hud housing and 24 CFR 964 for public housing. Proposed lease revision- preventing the "unauthorized tampering with or adjustment of any Opportunity Homes systems or equipment. Furthermore, residents would be required to contact Opportunity Homes and submit a formal work order and refrain from hiring outside	Public Housing conversion: No adjustment Lease revision - solicitation: No adjustment, resident councils remain unaffected as protected by law. External organizations should seek property approval before soliciting to residents to maintain peaceful enjoyment of the premises for residents. Lease revision - systems: No adjustment, residents should seek property maintenance assistance with work orders and fixes. Lease revision - keys and entry: Minor update for clarification. Lease revision - recording on property: Policy removed. Eliminating utility reimbursement activity: No adjustment, this activity seeks to remove the negative rent reimbursement for work-able households but will not affect utility allowance calculations. ACOP - payment agreements: No adjustment, existing RPA's will remain unaffected. New RPA's will reflect HUD standards on allowing RPA's only for under-reported or unreported income.

contractors. This is bad because this can be used to violate a tenant for changing the battery in a smoke detector or tightening a screw that is loose on a door handle. It prevents tenants from doing their own small repairs to avoid the larger costs of paying maintenance fees. Also prevents tenants who have waited for long periods for repairs from doing the repair themselves.
Proposed lease revision-keys and methods of entry-this mandates that tenants maintain exclusive possession of keys and access devices such as key fobs and prevents duplication or sharing keys and fobs with non tenants. This would make it impossible for tenants to make their own copies, again paying a fee to OSHA, and prevent tenants in the hospital from allowing family to pick up items, baby sitters and care givers from entering to take care of children, elderly or disabled.
Proposed lease revision- prohibiting use of mini washer/dryers
Proposed lease revision- prohibiting recording on property unless its a criminal act. This prevents tenants from getting proof and protecting themselves on properties. It is a violation of Texas One Party rule that only one person recording must know there is a recording.
Proposed ACOP(admissions and continued occupancy policy) Revision to eliminate utility assistance payments to zero rent tenants. For tenants who make less than the credits provided in their rent calculation, for example, a disabled individual who is waiting for their social security to kick in, gets the credit portion of their utility allowance deposited on to a debit card to ensure payments are made to CPS and/or SAWS. This is bad because tenants still need to pay their utilities and all tenants get the subsidy through HUD. Why shouldn't they receive it?
Proposed ACOP revision- reduce number of unit offers from 2 to 1. This is bad because residents coming off the waitlist are not allowed to apply to specific areas or properties. If the offered unit is not where they want to go or there are problems, for example a victim of domestic violence knows that someone who is related to or associated with the individual they are running from, they lose their chance to get housing.
Proposed ACOP revision- eliminate payment agreement for past due balance. This will evict tenants without the ability to make payments.

I do not agree with the Changes to Public Housing. Leave Public Housing As It Is! Please Stop these Changes!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
Thank you for the opportunity to provide resident feedback regarding the proposed revisions to the Opportunity Home lease and policy updates. I appreciate the ability for residents to submit comments before these policies are finalized. After reviewing the proposed changes, I would like to respectfully provide the following comments and concerns regarding several sections of the proposed policy revisions. 1. Recording and Documentation of Building Conditions The proposed language restricting audio or video recording on the property raises concerns because residents often rely on photographs and video to document building conditions, maintenance problems, and health or safety concerns. Residents frequently document issues such as pest activity, sanitation problems, water intrusion, HVAC concerns, or other building deficiencies in order to submit work orders or demonstrate ongoing problems that require repair. Photographic documentation is often required when reporting issues to outside authorities. For example, when submitting complaints through the City of San Antonio 311 system, residents are commonly asked to provide photographs documenting the condition being reported. Restricting residents from documenting building conditions could make it more difficult for residents to properly report potential code violations or safety concerns. It should be clearly stated that residents may photograph or record building conditions, maintenance problems, pest activity, sanitation issues, or other property-related concerns for the purpose of documenting housing conditions and submitting maintenance requests or code complaints. 2. Recording as an Accessibility Tool Recording meetings or conversations using voice memos can also be an important accessibility tool for individuals with disabilities. Some residents may have neurological or cognitive conditions that make it difficult to process or retain all information discussed during meetings or conversations at one time. Being able to review a recording afterward allows residents to better understand what was discussed and helps ensure accurate communication. Additionally, Texas law permits audio recording when a person participating in the conversation consents to the recording. Residents should be able to use recordings as a personal accessibility aid or for documentation of conversations in which they are participants. Policies should be written carefully so they do not unintentionally restrict accessibility tools used by residents with disabilities. 3. Entry Security and Responsibility for Building Access	1. Recording policy removed 2. Recording policy removed 3. Entry and keys policy: Minor wording adjustment 4. Formal policy will implement clear guidelines on use of doorbell cameras 5. No adjustment - residents should contact property staff for assistance in maintenance and building concerns 6. No adjustment 7. Policies that are approved and adopted will be coupled with clear guidelines and resident communication.

The proposed policy places responsibility on residents to prevent unauthorized entry, including rules related to tailgating and security access.
However, at this property the front entry doors can currently be pulled open without using a fob. This means the doors can be opened without any electronic access control.
According to Opportunity Home information regarding the 2022–2027 housing bond modernization project, security improvements were expected to be part of the completed work. If access control systems or entry doors are not functioning properly, residents may be unfairly held responsible for security issues caused by building equipment that is not working as intended.
Before enforcing stricter lease penalties related to building access, it would be appropriate to ensure that all building security doors, fob systems, and access controls are functioning properly.

4. Doorbell Camera Policy
Allowing doorbell cameras with written approval may help improve resident safety. Many residents rely on these devices because they provide a way to monitor activity near their doorway, particularly when building cameras are reported to be non-functioning.
Doorbell cameras installed at apartment doors are generally directed toward the hallway or walkway area outside the unit and do not point into other residents' apartments or private spaces. These devices allow residents to feel safer and help document activity near their own entryways.
Clear guidelines for placement and approval would help ensure that residents can install these devices responsibly while maintaining privacy expectations.

5. Maintenance and HVAC System Control
The proposed policy language states that residents may not interfere with or tamper with building systems such as HVAC equipment. While safety concerns regarding building systems are understandable, it is important to note that residents in this property do not have the ability to turn their HVAC units on or off or adjust the temperature inside their apartments.
Because there is no accessible control within the unit, some residents have had to turn off the HVAC unit using the breaker in the electrical panel when the system runs continuously or when indoor temperatures become uncomfortable.
This appears to be related to the design or operation of the building's HVAC system rather than residents attempting to alter building equipment. Residents should not be considered in violation of policy when they are attempting to manage indoor comfort due to a lack of user controls.
Clarification would be helpful to ensure that residents are not penalized for taking reasonable steps to manage indoor conditions when the HVAC system does not provide individual control.

6. Portable Washer and Dryer Policy
The proposed prohibition on portable washers and dryers should consider situations where residents may have mobility limitations or medical conditions that make shared laundry facilities difficult to access.
Reasonable accommodations should remain available for residents with disabilities when necessary.

7. Consistent Enforcement and Resident Communication If these policies are adopted, it would be helpful for residents to receive clear written guidance explaining the rules and expectations. Policies should also be applied consistently and fairly across the property. Residents should not be penalized for issues caused by building infrastructure, equipment failures, or conditions outside of resident control. Conclusion Public housing policies should support safe housing conditions while also ensuring that residents can document and report maintenance concerns, safety issues, or building deficiencies. Residents must be able to communicate concerns and document conditions affecting their housing without fear that doing so could violate lease provisions. I respectfully request that these policies be clarified to ensure they support transparency, accessibility, and safe living conditions for all residents.	
Drugs and shootings are a huge issue in the Alazans along either side stray dogs. It would be nice if we had a fence in our backyard so we can let our dog out without worrying about the strays trying to fight her. Some bushes or something in the front yard would be nice too for some privacy because I hate walking out my front door and here comes the neighbors asking me for favors such as rides and such. I tell them no but still. I like being left alone and I feel like I'm not. I have a sign on my door for people to not knock when it's dark because it's ridiculous.	Resident was forwarded to customer service staff to assist with operational concern.
I feel very happy here ,in peace in my own apartment.very blessed to have gotten this apartment for my kids thank you very much for all your help I couldn't have done it without yalls help it's very convenient for people with low income to find a home here for their kids .	N/A
Hello I am a resident who is currently on public housing . I realize that the economy is changing and that we're getting a lot of influence by outside investors but we cannot be bought, we shouldn't be bought because they bought out the apartment complex across the street from the hemisphere, and it isn't even for public housing. Everybody who lives there literally pays rent. There's only like 4 or 5, and that's what they want to do. They want to tear this down, move, everybody relocate them, build beautiful condos and say it's public housing and only really have 10 people who live here who are on public housing. That's not right.That's not what our tax dollars are for that's not what I work hard for and that's not what i'm voting for	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed. The referenced property is not a public housing property and was developed under a different program.

I am writing to express my strong opposition to Opportunity Home's plan to convert public housing units to project-based vouchers through the Rental Assistance Demonstration (RAD) Program. Public housing is one of the most deeply affordable housing options available in San Antonio and plays a critical role in keeping families, seniors, and people with disabilities stably housed. Even for those who do not live in public housing, its preservation is essential to maintaining an affordable and equitable housing system in our city. l urge Opportunity Home to keep public housing public.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I am outraged about proposed changes to MTW. Opportunity home has done little to inform residents about these changes that will have deadly consequences for our people in public housing. I demand a halt to all proposed changes and demand a forming of a subcommittee to review these changes properly. Keep public housing public now!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
Hello, I was just told that there were gonna be some changes in the public housing units that my family lives in and I am really upset and frustrated about this situation. There was very little notice about these changes that my family had not been aware of at all especially as how negatively impacting this would be on their lives. I and my family are opposed to ALL of these proposals and I hope that a subcommittee will be formed SOON for them to review these changes and proposals. Do NOT let these proposals and changes happen. KEEP PUBLIC HOUSING PUBLIC.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
It is very upsetting that Opportunity Home has not done proper outreach to community members and residents about the proposed changes to Moving to Work. Many of the changes are sure to cause hardship for residents and family of residents - others are unclear and need more clarification including during meetings where resident questions and comments is addressed without gaslighting It is very clear to me that Opportunity Home is trying to sneak these changes in without controversy - you have failed. I reject all proposed changes to Moving to Work. Keep public housing public now and forever!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

I am outraged that over 30 proposals to change the MTW Plan occurred with little time for many tenants to understand, be informed, and hear about all the changes directly from Opportunity Home. Hold new appointments for the 4 Commissioner spots whose terms are expired- do not reappoint. I oppose all proposed changes to the MTW Plan and request that a subcommittee be formed to edit, revise and do proper outreach to tenants. Keep Public Housing Public!!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I am opposed to all the MTW proposals being voted on, as they do not give me and my neighbors, any discussion, or any further notice about what will happen to our housing. I demand further transparency for residents and public discussion to be involved.	Multiple presentations were hosted to share the MTW plan updates, a video was made available online for viewing and residents were notified via email, flyers and other channels.
I am a resident at the Alazan Apache Courts. I have lived there for 35 years and I am very upset that I didn't know about the changes that are being made that I believe are going to hurt people. I'm sorry to tell you that people are going to sleep on the streets, especially disabled people and families with children. None of my neighbors know about these changes, and I only found out because I am always asking when they are going to redesign and rehab the Alazan Apache Courts like they once told us at the last community input meetings. All I ask is that you be fair and give us time to review and consider all of the changes to determine if they are going to be good changes or not. Many people are disabled just like myself and they need payment plans and any and all support that they can get. Thank you so much for your attention! Keep Public Housing Public!	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed. The Alazan Apache Courts are not included to begin repositioning in FY27.
I am writing to express my strong opposition to Opportunity Home's plan to convert public housing units to project-based vouchers through the Rental Assistance Demonstration (RAD) Program. Public housing is one of the most deeply affordable	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

housing options available in San Antonio and plays a critical role in keeping families, seniors, and people with disabilities stably housed. Even for those who do not live in public housing, its preservation is essential to maintaining an affordable and equitable housing system in our city. l urge Opportunity Home to keep public housing public.	
I am writing to express my strong opposition to Opportunity Home's plan to convert public housing units to project-based vouchers through the Rental Assistance Demonstration (RAD) Program. Public housing is one of the most deeply affordable housing options available in San Antonio and plays a critical role in keeping families, seniors, and people with disabilities stably housed. Even for those who do not live in public housing, its preservation is essential to maintaining an affordable and equitable housing system in our city. l urge Opportunity Home to keep public housing public.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I am writing to strongly express my support for Opportunity Home's plan to convert Section 9 public housing through the Rental Assistance Demonstration program. This conversion will preserve affordability for those who need it most while ensuring adequate funding levels to modernize and rehabilitate the aging infrastructure of many of the public housing communities owned by OHSA. Low-income residents across San Antonio deserve modern, dignified housing that is affordable and sustainable.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I am writing to voice my strong opposition to Opportunity Homes moving to work plan,especially the conversion of public housing to project based vouchers under the Rental Assistance Demonstration program. Public Housing is the most affordable housing San Antonio has and the housing my family and I is proud to call home. I am concerned these changes would result in the privatization of RAD conversions can also weaken tenants protections increase housing costs and cause displacement. Most of the people in San Antonio who live in public housing are children, seniors, and those with disabilities. I am not comfortable with Opportunity Hom risking my family and my neighbors housing security with	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

this plan. Public housing belongs to the public belongs to the public and the people who live here like me.	
I'm with The Coalition For Dignified Housing and I'm Here to urge you to help us push back against the changes that opportunity home is trying to make for instance, one of the ones that prohibits door knocking and flyer in in their properties.as a promotora and active resident of the historic westside. I think it's important that we keep these connections with our fellow neighbors strong we've already made such good relationships with them and stopping that would build up a wall between us Amplifying the barriers that already exist in our community.sone of the things that we door knock or flyer about are important issues like the city of San Antonio's cool neighborhood project, our new neighborhood gem like the museo del westside/westside museum, our jardines y vivienda project which builds community gardens and with residents in their front and back yards, local resources, resident association meetings, oral history and convivios that helps people root to their history and gives our comunidad the sense of pride -orgullo- love y respeto of where they came. PLEASE DON'T TAKE THAT AWAY from them or us to have those connections.	External organizations should seek property approval before soliciting to residents as normal. Lease proposals are tenant obligations and do not affect the general public.
I am writing to formally express my opposition to the proposed conversion of our public housing to project-based vouchers under the Rental Assistance Demonstration (RAD) program. While I understand the stated goals of improving funding and property conditions, I am deeply concerned about the risks this conversion poses to residents. These include potential displacement during renovations, reduced long-term tenant protections in practice, and the shift toward private management, which may reduce accountability to residents. Public housing provides critical stability, and changes of this magnitude should not move forward without clear, enforceable guarantees that fully protect current residents—not just in theory, but in practice. At this time, I do not believe those protections have been adequately demonstrated.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

For these reasons, I respectfully urge you to cancel this proposal and instead pursue solutions that preserve public housing while directly addressing maintenance and funding needs.	
I write today on behalf of UNITE HERE Local 23 to voice strong opposition to Opportunity Home's Moving to Work plan, especially the conversion of public housing to project-based vouchers under the Rental Assistance Demonstration (RAD) Program. I am concerned these changes would result in the privatization of our community. RAD conversions can also weaken tenant protections, increase housing costs, and cause displacement. As a union of hospitality workers, we know all too well the challenges our community experiences in finding an affordable, clean, and secure place to live. As the cost of living continues to increase while wages do not, working people quickly run out of options. Most of the people in San Antonio who live in public housing are children, seniors, and those with disabilities. It is not worth risking our neighbors' housing security with this plan. Public housing belongs to the public and the people who live there. Protecting our public assets from privatization and ensuring the long-term health of these programs should be our first priority, especially as we see real estate investment corporations gobble up our neighborhoods and artificially inflate rents. Thank you for all the work you do for our community.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
Public Housing has allowed me to raise my children. Without the fear of my rent increasing, and eviction notices. It has given my children stability and security. Meaning, they're not having to wake up to the fear of losing the home they share with their family. It has given me the opportunity to go and work for the degree I need to secure my future and set a new standard for the future generations of my family. Public Housing has given me the helping hand housing me while I reach within myself to strive and set forth for my goals	N/A
I'm writing this email in hope that my voice will make a difference in not turning public housing into project-based vouchers. I can list endless reasons why public housing	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to

should just stay the way it has been . If public housing wasn't an actual program I don't know how I could of gotten ahead in life for the sake of my children . It allowed me to have a roof over me and my kids head based on my income and also catch up on bills and put myself through school. I know for a fact that public housing has assisted billions of families world wide so please keep public housing the way it is . I'm scared and nervous not understanding what will come if public housing changes . I have tons of questions on how it'll affect families out here that are trying to get by and do the best we can possibly do . Please don't change public housing but if certain stuff isn't working then apply more rules make small changes but don't take housing away from us .	be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed. The Organization is committed to providing quality affordable housing to current and future residents of our properties.
Several questions come to mind about the possible conversion of Section 9 public housing into Section 18. Who would it benefit as it seems public housing would take a hit and serve far less. I also don't believe putting a flyer on my door 2 DAYS before the deadline for comments is near enough time for any resident to comment on this issue.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed. Residents were alerted through email, property flyers and other channels at the start of the public comment period.
I live in Hemisview Village Apartments these apartments are falling apart. All door locks don't work garage gate have been broken for years and we have had multiple car burglaries. Floors are very dirty and so many criminal activity going on. Elevators don't work properly the floor inside is always smelly and dirty. And garage floors are dirty trash all over it's bad here. Manager knows but it's getting worse every day. Who can speak to about this place besides management or corporate office they are not helpful at all. If someone would come from opportunity homes inside to it but not to tell the office they would see it all. It's so ugly and unsafe in these apartments.	Resident was forwarded to customer service staff to assist with operational concern.
I've been living in the cassiano homes for about 6 years now. I'm very blessed to have a place to live for myself and my 3 children but there's some things I believe we should not have to be dealing with just because we're on assistance. For instance ever since I've moved in I've had sewer problems. One time we walked into the bottom floor	Resident was forwarded to customer service staff to assist with operational concern.

and it was totally covered in sewer water. I was finally able to afford couches and they were soaked in sewer water. The maintenance came in and literally handed me a shop vac and said, take your time with it, I'll pick it up later. Finally plumbers came and made a remark to me that the whole system needed to be replaced but housing is only covering up the problem by having them suck out the lines and of course we keep having problems with the sewer. Living with many gnats because of it. Flying in our food and in our eyes and up our noses, it's disgusting.
We had problem with our windows being drafty and the locks were broken. They solved that for awhile by screwing the windows shut. They finally replaced all the windows. While doing so they left us out in the cold for over 7 hours. Myself and my kids were sitting all those hours in our vehicle in the winter because we had no money and no place to go.
We have a washer connection but no connection for a dryer, I am disabled and cannot go outside to hang clothes. So I have to lay the clothes over sofas and chairs and tables so they can sit there and dry till the next day. We have 1 ac unit in the living room that does not reach the top level. In time I was donated window units for each room from family and friends which raised my electric bill sky high. I pay over 350 for my light bill on summer days and about 300 in the winter time. The heating system is also as old as the building itself. The restroom has an old heater that is broken so we have to take showers and get out quickly because it's cold and be aware that the water from the shower will be turning cold on us in a matter of minutes. I am disabled and I was approved for a reasonable accommodation almost a year ago with no word about that move. I have fallen off the stairs several times. It's very dangerous for me. I have gone to the doctor because of these falls. Pest control comes once a month but it doesn't help. We have so many mice and roaches in our home, it's embarrassing. I don't have visitors come because of this problem. When we walk out or home we have to be careful because the stray dogs are everywhere. Some are vicious and growl at us.
I have broken tile in the upper level. Tile that's probably as old as the building. I trip on the pieces every once and awhile. I don't call maintenance because one time I called to have the light bulb changed, the highest one on the

stairway and I was billed 30 dollars for it. I can't afford to pay that. My bill with rent and other charges is way over due by over 1000 dollars. I cannot catch up with it. I am on dialysis and have equipment and supplies. My supplies needs to stay at a certain temperature in order for it to be usable. I wouldn't mind paying the 300 dollar rent I have if I were living in better conditions. I am begging and praying for this transfer to come through so we can live a better more comfortable safer life. Thank you for listening. I hope to hear back from anyone regarding this matter. I am in urgent need of a change.	
WE NEED TO KEEP PUBLIC HOUSING AS PUBLIC. PLEASE RECONSIDER THE IMPACT OF THE MTW PLAN. It is going to hurt many people. This is not okay.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
Comment received in document form: https://drive.google.com/file/d/1FNYkFTytjDz1omFueuYh2byW4eswHyi_/view?usp=sharing	The submitted document has much of the same comments as above. Some were adjusted, others were not adjusted. Other suggested revisions were reviewed - no adjustments made.
Comment received in document form: https://drive.google.com/file/d/1toza2fS8kWF5g-_6yf0UXB-MeUb_uMaC/view?usp=sharing	Document provides comment on Public Housing conversion: No adjustment.
I lived in public housing for 26 years and some of the changes you are proposing are not a good option. It's very stressful when they tell you they're going to evict you from your home and you don't know where to go when you have no family and no money; it's very frustrating not knowing where to go, the world closes in on you. 30 years ago, I was able to have an apartment thanks to my son who was a US citizen. I paid my part of the rent and received a discount for my children on the rent. I have always been a domestic worker and I continue to work in the same field, and back then my salary was $15 to $30 per day, cleaning 2 houses, if I was lucky. which was barely enough to pay rent and electricity.	Mixed status guidelines come directly from HUD, the Organization has no oversight on this policy proposal. Payment agreements: No adjustment.

Had we not had the opportunity for public housing, my children and I would have been living on the street or in domestic violence. Thanks to it, my children were able to graduate from high school; one is in the military and my daughter has a degree in international business. If these policies that are being proposed now do not allow mixed families, Many families would be left unprotected and children without opportunities to improve their lives and have dignified housing. Also, please continue to allow payment arrangements for families and let non profit organizations Continue to bridge the gap in reducing barriers to opportunities for engagement, growth, and community connection.	
I was really happy to read about the RAD housing benefits. Housing is a right for every person and family. It's good to see my community being assisted and the generational effects that will have.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I read about the RAD Project and wanted to communicate that the benefits of this program are uplifting. I especially like the assistance with housing renovations, and the ability to have choice mobility. Thank you so much for doing this in our community.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I strongly support improving and expanding public housing because it plays a critical role in helping people stay stable and avoid homelessness. Right now, there simply aren't enough affordable homes—there's a shortage of millions of units for low-income renters in the U.S. . That's why updating and investing in public housing is so important. From my perspective, improving public housing means making units safer, more modern, and energy-efficient, while also building more housing so families aren't stuck on long waiting lists. Government investments have already shown that expanding housing assistance and upgrading properties can improve quality of life, increase stability, and support millions of people nationwide .	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

I believe better public housing isn't just about shelter—it's about giving people a fair chance to succeed, reduce stress, and build a more secure future.	
This is email is to voice my support for Rental Assistance Demonstration (RAD) assistance to individuals and families in need. I support this initiative mainly because of the stability it offers in their housing. This is especially important for children as they are able to maintain their housing and sustain a sense of security in knowing they are in a safe environment, which in turn promote and increases a positive performance in school, community and greatly reduces the trauma of falling into homelessness. I support this initiative also for the reason that mostly children, will be able to grow in their studies and have a greater chance of breaking a cycle of poverty and increase their chance of staying in school.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
We should be allowed to use ring doorbells or cameras on individual doors! There should be a weight limit for tenant dogs! Large vicious dogs such as pit bulls, and other large animals should not be allowed on property!	Doorbell cameras are a proposed policy and will go into effect upon acceptance of this plan. Other concerns were forwarded to customer service staff for follow up.
A Fair Avenue resident and resident council member left a comment stating that she is in favor of RAD redevelopment to bring much needed improvements to the property	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
One of the things I appreciate most about the RAD program is the focus on long-term improvements. The upgrades and renovations help communities feel safer, more modern, and more comfortable for families. At the same time, the program continues to keep rent based on income, which makes a huge difference for families trying to become and maintain financial stability. I believe one of the biggest perks of the program is the ability for families to have the freedom to move to a private residence, once they've resided in a RAD property for certain amount of time, while the government still assists with rent. The RAD program is a great step toward preserving affordable housing while improving the quality of life for residents. Residents are grateful to a be a part of a community that	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.

is investing in its future.	
New is good ...change is hard	N/A
I am writing to express my strong opposition to Opportunity Home's plan to convert public housing units to project-based vouchers through the Rental Assistance Demonstration (RAD) program. Public housing is one of the most affordable housing options in San Antonio and is critical to ensuring that families, seniors, and people with disabilities remain stably housed. Its preservation is essential to maintaining an equitable housing system for our entire community. I urge Opportunity Home to keep public housing public.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
Comment received in document form: https://docs.google.com/document/d/e/2PACX-1vTePDK07 1NbR9FRbjggrADy0Nam_9oTqoz05VjS3RghUChOXkHGP7 TROshYjlJc1Q/pub	Public Housing conversion: No adjustment. Recording on property: Policy removed Solicitation: No adjustment.
Comment received in document form: https://drive.google.com/file/d/1hp5bVTqb0Y4ktRbqgtTuc KfvfWt8CShT/view?usp=sharing Between February 23 and March 19, 2026, CTJ visited over 1,100 households. This outreach was conducted in addition to the 1,915 doors reached by the District 5 Councilwoman's office. Notably, none of the residents we spoke with were aware of the Moving to Work Plan, its potential impact, or the open comment period. This indicates a critical need for more effective community outreach. Additionally, we wish to report an incident at Alazan Courts on March 18, 2026. While visiting the property, maintenance staff followed our volunteers—some of whom are Alazan residents—while recording and taking photographs. While we recognize the importance of tenant safety, the repetitive nature of these actions felt like an intimidation tactic. This experience reinforces our concern that the proposed solicitation changes may suppress grassroots resident organizing. Unfortunately, this is not an isolated event. We hope to see a more welcoming environment for tenant	Federal Item 1-3: HUD proposals. OHSA has no oversight of proposed policies. OHSA Item 1-3: No adjustment. OHSA Item 4: No adjustment to some, minor adjustments to some, recording on property policy removed. Public Housing conversion: No adjustment. Multiple presentations were hosted to share the MTW plan updates with residents, a video was made available online for viewing and residents were notified via email, flyers and other channels. Operational concerns at property were forwarded to appropriate internal staff for awareness.

organizing in the future and appreciate your consideration of our perspective.	
Translated from Spanish: I am writing to express my firm opposition to Opportunity Home's plan to convert public housing units into project-based vouchers through the "Rental Assistance Demonstration" (RAD) program. Public housing is one of the most affordable housing options available in San Antonio and plays a vital role in providing stable housing for families, seniors, and people with disabilities. Even for those who do not reside in public housing, its preservation is essential to maintaining an affordable and equitable housing system in our city. I urge Opportunity Home to preserve public housing as such—a public resource for our most vulnerable residents—and to refrain from making changes that could diminish the already limited opportunities available for accessing public housing.	No adjustment. The Organization will move forward with the repositioning plan as proposed including 4 potential properties to be submitted for formal conversion commencement in FY27 after all required HUD steps have been followed.
I submit these comments on behalf of the Historic Westside Residents Association. Our Association represents residents who are homeowners, renters and public housing tenants. Our Association opposes the proposed policy changes because of the negative impact they will have on our residents, our community and the city of San Antonio. Public Housing Conversion to Rental Assistance Demonstration The mission of Housing Authorities is to provide affordable housing for low-income families, senior citizens and disabled individuals who cannot afford housing in the regular market, to help stabilize housing situations and prevent individuals from becoming homeless. RAD does not offer the same protections that Public Housing offers. Public Housing has several statutory protections that are stronger, more permanent, or more enforceable than those under RAD. As a Housing Authority that benefits from tax exemptions for the purpose of providing affordable housing for low-income individuals and families, Opportunity Home SA needs to prioritize and preserve the most affordable housing units for our residents at and	Public Housing conversion: No adjustment. Overview of ST & LT Goals: No adjustment. Recording on property policy proposal: Policy removed. Repayment agreement policy updates: Minor wording adjustment.

below 30% AMI. Our city and residents are dealing with a major housing crisis which has led to an increase in homelessness. San Antonio's Public Housing is one of the greatest safeguards that exists for our most vulnerable residents; therefore, the Opportunity Home SA Board of Trustees should NOT vote to approve this policy change.

Overview of Short-Term and Long-Term MTW Goals and Objectives
Your proposed amendment stating a goal for "ensuring long-term affordability and stability for all residents of the San Antonio area" does not guarantee that Opportunity Home SA will focus its resources on ensuring long-term affordability and stability for households at the lowest income levels which, as a Housing Authority, should be Opportunity Home SA's focus and priority.

Public Housing Lease Revisions
The prohibition of audio and video recordings is a violation of residents' civil rights which is protected by the Constitution's First Amendment. Audio and video recordings are tools that residents use to document discrimination or harassment.
ACOP Revisions: Elimination of Repayment Agreements
This policy will lead to residents being evicted and homeless. The purpose of a Housing Authority is to PREVENT individuals from becoming homeless. The City of San Antonio can continue to assist residents with outstanding balances to provide Opportunity Home SA to recoup these funds.

FY27 MTW Plan Amendment:

MTW Significant Amendment Timeline:

Date	Description	Outreach	Attendance
July 3, 2026		Comment period opened	
July 21, 2026	Public Hearing	Website posting, email, physical flyer	15 persons
August 2, 2026		Comment period closed	
August 5, 2026		Final Board Approval	

Materials posted:

- Public hearing and public comment period notice
- FY2027 MTW Plan Significant Amendment

Feedback Overview:

All public comments are copied verbatim from email and/or physical comment cards. 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. There were a total of 3 comments made during the public comment period.

Public Comment	Adjustments to Plan (if any)
NO FORMAL COMMENT: Question around whether current rent structures were changing based on the new activity being proposed	None. The submitter received a response via email.
I submit this comment in opposition to both components of the proposed amendment: MTW Activity 2026-2 (Local Project-Based Voucher Subsidy for Tax Credit Developments) and the Appendix I additions, including the redefinition of the Significant Amendment standard. I request that this comment be entered into the administrative record in full, that each numbered objection receive a written response in the final submission to HUD, and that the amendment be withdrawn or substantially revised before submission. 1. The amendment contains no fiscal analysis, and the omission is disqualifying. Section B, Cost Implications, presents zero quantitative content. No baseline HAP expenditure data. No projected per-unit subsidy amounts. No identification of the AMI bands to be applied at Creekside, San Juan I, San Juan II, Monterrey Park, or La Providencia. No surplus or deficit estimate. The section's sole substantive claim, that the activity will be "HAP-neutral or provide a minor, predictable cost-savings surplus," is an assertion without any published model against which the public can test it. A comment period on an unquantified proposal is not meaningful public participation; it is procedural theater.	None. The submitter received a response via email.

The agency cannot plead incapacity. The San Antonio Housing Authority was a participating agency in HUD's Rent Reform Demonstration, a multi-year randomized controlled evaluation of alternative rent policies that ran through the second triennial recertification in 2022. This organization possesses direct institutional experience modeling the rent burden and subsidy effects of alternative tenant payment structures. The absence of any such analysis here is a choice.

Demand: Publish the complete fiscal model, including baseline HAP data, per-unit subsidy calculations, the target AMI band for each covered unit by bedroom size, and projected tenant rent as a percentage of income across the actual income distribution of the agency's waiting lists, and reopen the comment period for 30 days following publication.

2. Activity 2026-2 waives the Brooke Amendment protections that define federal housing assistance, and the impact analysis evades the affected population.

The activity requests waiver of Sections 8(o)(2)(A)-(C) of the United States Housing Act of 1937 and 24 CFR 5.628, the provisions capping tenant rent at 30% of adjusted income. Under the proposal, tenant rent is instead set at the applicable tax credit rent for the unit's target AMI band. Tax credit rents are calculated from the income ceiling of the band, not from the tenant's actual income. A household earning substantially below the band ceiling, which describes most extremely low-income voucher-eligible households in Bexar County, will pay rent consuming well over 30% of income, in many cases over 50%, the federal threshold for severe rent burden.

Section D.i dismisses impact analysis on the ground that no current residents occupy these units. This is a category error. The impacted population is every future applicant who would pay 30% of adjusted income under standard PBV rules and will instead pay a flat tax credit rent. That population is fully modelable from the agency's own waiting list income data. The claim that families will occupy these units "voluntarily with prior knowledge of the flat tax-credit rent bands" is not analysis. Where subsidized units are scarce and waiting lists run years long, foreknowledge of an unaffordable rent is not choice. It is a condition imposed on people without alternatives.

The activity claims to advance the statutory objective of "increasing housing choice for low-income families." It does the opposite. Flat rents at tax credit levels strip the deep income-based affordability that distinguishes a project-based voucher from an ordinary LIHTC unit. The product is LIHTC housing carrying a HAP contract, priced out of reach of the extremely low-income households the voucher program exists to serve. Section C states the actual objective plainly: "reassuring bank underwriters with consistent rent revenues" to support "increased permanent loan sizes." Tenant rent floors are being pledged as underwriting collateral, and any surplus, which is by definition money collected from tenants above the 30% standard, is redirected to the development pipeline. That is a regressive transfer from the poorest residents to construction financing.

Demand: Withdraw the waiver request, or in the alternative, cap tenant rent at the lesser of the tax credit rent or 30% of adjusted monthly income.

3. The hardship provision is discretionary, temporary, and set above the federal cost-burden threshold.

Section D.ii states Opportunity Home "may establish" a hardship policy. Not shall. The relief trigger is a flat rent exceeding 40% of adjusted monthly income, a level already past HUD's own 30% cost-burden standard. Relief consists of a 90-day temporary reversion to income-based rent, renewable only upon continuous re-verification. As drafted, severe rent burden is the design baseline and relief from it is a revocable favor requiring perpetual paperwork from households in crisis.

Demand: Any approved version must make the hardship policy mandatory, set the trigger at 30% of adjusted income, and provide that reversion to income-based rent lasts as long as the qualifying hardship persists, with re-verification no more frequently than annually.

4. The subsidy conditionality clause shifts appropriations risk onto tenants.

Section A provides that "Payment of the HAP subsidy shall be subject to the availability of federal funding" while fixing the subsidy amount and the tenant rent. In a shortfall, a standard PBV structure adjusts through the agency's HAP reserves and administrative mechanisms. Under this structure, with the agency's obligation fixed and conditional, shortfall exposure migrates to the project and ultimately to tenants facing rent demands or lease enforcement. The amendment nowhere explains how a funding shortfall would be absorbed.

Demand: Publish the shortfall protocol before submission, including the order of loss absorption among agency reserves, project owner, and tenants.

5. Appendix I solicits comment on converting approximately 430 units, four of five properties elderly/disabled housing, without a relocation plan.

Page 8 states: "Opportunity Home does not yet have a relocation plan available with this amendment. A relocation plan will be developed as soon as possible." The relocation plan is the single document most consequential to the elderly and disabled residents of Tarry Towne, Villa Hermosa, Lofts at Marie McGuire, and HB Gonzalez, and to the families at Westway. Soliciting public comment on conversions while withholding it renders the comment period an empty formality as to the very people the process exists to protect.

Demand: No FY27 RAD or Section 18 application for any listed property until a relocation plan is published and subjected to its own 30-day comment period and public hearing.

6. The Significant Amendment redefinition eliminates future public process and must be withdrawn.

Page 9 excludes from the definition of substantial deviation: (a) the decision to convert to PBRA or PBV assistance, (b) capital fund budget changes resulting from conversions, (c) changes to construction and rehabilitation plans, and (d) changes to financing structure. The agency has publicly stated its intent to transition its entire public housing portfolio, more than 6,000 units, over the coming decade. Under this redefinition, every conversion decision, every rehab scope, and every financing structure across that entire transition would bypass formal public comment permanently. A 9-page amendment noticed July 2 with a hearing July 21, at the height of summer, is being used as the last public checkpoint for a decade of portfolio-wide decisions. This provision is the most consequential language in the document and receives no justification anywhere in it.

Demand: Withdraw the redefinition in full. Each property conversion, and any material change to financing or construction scope, must remain a substantial deviation subject to public process.

7. Data integrity defects in the HUD submission tables.

Development 4, Lofts at Marie McGuire, is assigned PIC Development ID AMP#TX006000010, identical to Development 2, Villa Hermosa. Development 5, Henry B Gonzales, is assigned AMP#TX006000026, identical to Development 3, Westway. The same property is spelled "HB Gonzalez" on page 1 and "Henry B Gonzales" on page 7. Additionally, Villa Hermosa's five 2-bedroom units are listed "TBD" post-conversion where every other occupied bedroom category states "at least" the pre-conversion count, language that permits elimination of those units. These defects should be corrected on the record, and the "at least" floor should apply to all occupied unit counts at all five properties.

Conclusion

The amendment as noticed is a financing instrument dressed as housing policy. It withholds the fiscal data that would allow the public to evaluate it, evades impact analysis of the population it will burden, offers discretionary and inadequate hardship protection, defers the relocation plan that matters most to elderly and

disabled residents, and quietly terminates public oversight of a decade-long portfolio conversion. I ask the Board to reject the amendment as drafted, direct staff to publish the withheld analyses, and renotice a corrected amendment for a full comment period. I request written acknowledgment of receipt of this comment and inclusion of this comment and the agency's responses in the amendment package submitted to HUD. Respectfully submitted,	
As dedicated tenant advocates committed to preserving housing justice, protecting low-income families, and ensuring our public housing authority upholds its legal and moral mandate to provide truly affordable housing, we submit the following formal public comments regarding the proposed FY2026–2027 Moving to Work (MTW) Plan Amendment. 1. Acknowledging Federal Policy Shifts and Development Pressures We recognize and appreciate that shifting federal policy directives, persistent capital shortfalls, and severe development financing gaps present complex operational challenges for housing authorities. Finding innovative financing mechanisms to leverage tax credits and bring critical housing units online—such as the 489 units targeted across Creekside, San Juan I & II, Monterrey Park, and La Providencia—is a vital goal in addressing San Antonio's deep housing crisis. However, financial feasibility must never come at the expense of core tenant protections or the risk of providing cost burdened housing to extremely low income tenants. 2. Overly Broad Waivers: Why Waive Entire Statutory Sections? Under Section III (C), Opportunity Home proposes full waivers of: Sections 8(o)(2)(A)–(C) of the U.S. Housing Act of 1937 24 CFR § 5.628 (Total Tenant Payment)	None. The submitter received a response via email.

While flexibilities may be required to structure debt for Tax Credit developments, waiving these entire statutory and regulatory sections raises serious concern.

Lack of Specificity: Section 8(o)(2) and 24 CFR § 5.628 establish the foundational statutory safeguards for tenant rent contributions—specifically capping rent at 30% of a family's adjusted gross income. Waiving entire sections completely dismantles the standard baseline calculation rather than adopting targeted, narrowly tailored adjustments.

Justification Gap: Why are broad, full-section waivers necessary when the stated goal is simply establishing flat tax-credit income bands? Opportunity Home should detail why narrow, tailored flexibilities cannot achieve the same underwriting goals without sweeping away the overarching federal statutory frameworks that define tenant protections

Eviction Protection Waivers-24 CFR 5.628 (4) The minimum rent, as determined in accordance with § 5.630; specifically and wholly protects residents from eviction if the minimum rent is more than they can afford to pay. (b) Financial hardship exemption from minimum rent — (ii) When the family would be evicted because it is unable to pay the minimum rent (iii) When the income of the family has decreased because of changed circumstances, including loss of employment;(iv) When a death has occurred in the family; and (v) Other circumstances determined by the responsible entity or HUD.

3. Scope of Application: Restore-Rebuild Specificity vs. Blanket Authority
The proposed plan text states that this activity will apply to designated Restore-Rebuild developments, but also adds that it may extend to "future units predicated on each transaction's needs."

Clarification Needed: Is this waiver strictly limited to the specified Restore-Rebuild units, or does it grant a broad, blanket authorization for any and all future project-based voucher conversions across the agency's portfolio?

Guarding Against Expansion: A blanket waiver creates a dangerous precedent where flat, tax-credit-based rents could permanently replace traditional income-based rent subsidies across future acquisitions without subsequent public review or community oversight.

4. Mitigating Risks for Low-Income Tenants
While the proposal notes that families moving into these units will enter voluntarily, setting Total Tenant Payment (TTP) to maximum Low-Income Housing Tax Credit (LIHTC) rent limits inherently risks overburdening extremely low-income households whose actual income falls well below maximum AMI bands.

To mitigate risks to future residents and safeguard deep affordability, Opportunity Home must adopt the following binding protections:

Robust and Automatic Hardship Policies: The proposed 90-day hardship review must be binding, accessible, and prolonged. If a family experiences an involuntary loss of income or medical emergency, returning their rent contribution to 30% of adjusted monthly income must be guaranteed for as long as the financial hardship persists, rather than abruptly expiring after 90 days.

Protection Against Utility Cost Spikes: Tax-credit rent schedules often compress utility allowances. Opportunity Home must guarantee that total out-of-pocket costs (rent + utilities) never exceed true affordability thresholds for households in lower income tiers.

Annual Rigorous Impact Monitoring: Annual re-evaluations must include transparent metrics published to the public detailing average tenant rent burden, hardship request approval rates, and displacement/eviction tracking within these specific properties.

Conclusion
Housing authorities exist to insulate vulnerable families from market pressures, not adapt standard voucher protections downward to meet underwriting gaps. We urge Opportunity Home San Antonio to refine Activity 2026-2 by narrowing the scope of statutory waivers, restricting the flexibility strictly to designated projects, and embedding

robust, long-term tenant safeguards.

Thank you for your consideration of these comments.

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 updates 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.~~ A repayment agreement may be offered at Opportunity Home's discretion based on the policies outlined in 16.3.B.

~~(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 Public Housing Agencies (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~~ may 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. Exceptions to this policy may be made on a case by case basis, including hardship exemptions outlined in 6.3.B.

(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. Exceptions to this policy may be made on a case by case basis. *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 Offer~~s~~:

(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 “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.

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 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.

(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 FY26-27 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.

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) All Household members are strictly prohibited from duplicating or providing access devices to any guest without management approval. 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 safety equipment or utility systems, including but not limited to HVAC units, 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.

3. Any work that requires a permit and/or licensed professional must be handled by Opportunity Home maintenance personnel or Opportunity Home approved vendors.

    a. To maintain compliance with federal funding guidelines, tenants may not adjust or modify energy-efficient fixtures, plumbing, or electrical systems in the dwelling unit.

4. Notwithstanding the above, the tenant is permitted to perform minor, non-structural tasks that do not require tools, permits, or specialized training, or licensed professionals.

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 <u>the approved </u>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 <u>[FR Notice 8/13/24]</u>

~~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.~~

<u>(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.</u>

<u>(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.</u>

<u>(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.</u>

<u>(4) The following alternative requirements related to income apply to VASH families:</u>

(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 983103(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 statue, upon contact 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 Homebased 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 FY2027 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. **Strategic 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 ($)[3]
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 Year[4]	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		*Not yet determined*	
		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	**District**	**Developer**	**Financing**	**Total Development Cost ($)**	**Total Units**	**PH/ PBV**	**PBRA**	**30 %**	**40%**	**50%**	**60%**	**70%**	**80%**	**Market**
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	Conventional Loan	$67,914,812	360	0	0	0	0	0	36	0	144	180
Josephine	D1	LYND	Conventional 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.

Project Name	District	Developer	Financing	Total Development Cost ($)	Total Units	AMI LEVEL 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 PBRA	PH/PBV	30%	40%	50%	60%	70%	80%	Market
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
Tarry 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.

						Local Non-Traditional Eligible Units						
Project Name	**District**	**Type of Tax Credit**	**Proposed Action**	**Total Units**	**PH/ PBV**	**30%**	**40%**	**50%**	**60%**	**70%**	**80%**	**Market**
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 115809 115810 115811 115812 115813 115814 115815 115816 115817 115818	903 HEDGES ST 909 HEDGES ST 913 HEDGES ST 915 HEDGES ST 917 HEDGES ST 927 HEDGES ST 929 HEDGES ST 931 HEDGES ST 933 HEDGES ST 935 HEDGES ST 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 108019	331 LAVACA ST 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 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	Miller Child Development Center / Springview
115561	1907 MONTANA ST	
116082	102 S MEL WAITERS WAY	
115586	E COMMERCE ST	Springview
116625	916 HEDGES ST	
112746	1011 LOCKE ST	Adjacent to TPSO and Sutton Oaks I
151169	4063 BREMEN ST	Vacant parcel
512161	E COMMERCE ST	Eastside Lots - possible home ownership
551676	1822 ARBOLEDA ST	
580339	7822 GLIDER AVE	
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.

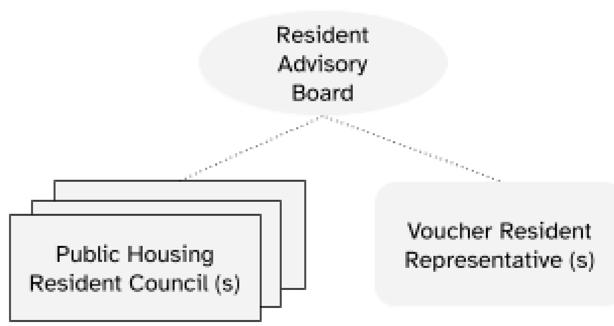
SS #8: Households Transitioned to Self Sufficiency
Unit of Measurement
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided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

Executive Summary:
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: Tarry Towne	**PIC Development ID:** AMP#TX006000013	**Conversion Type:** RAD / Section 18 Blend	**Transfer of Assistance:** No
Total Units: 98	**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	0	TBD	N/A
1 Bedroom	68	At least 68	N/A
2 Bedroom	30	At least 30	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	At least 41	N/A
1 Bedroom	20	At least 20	N/A
2 Bedroom	5	At least 5	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	At least 22	N/A

2 Bedroom	41	At least 41	N/A
3 Bedroom	63	At least 63	N/A
4+ Bedroom	26	At least 26	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	At least 19	N/A
1 Bedroom	38	At least 38	N/A
2 Bedroom	6	At least 6	N/A
3 Bedroom	0	TBD	N/A
4+ Bedroom	0	TBD	N/A

Development 5:

Name of Development: Henry B Gonzales	**PIC Development ID:** AMP#TX006000026	**Conversion Type:** RAD / Section 18 Blend	**Transfer of Assistance:** No
Total Units: 51	**Pre-RAD Unit Type:** Elderly/Disabled	**Post-RAD Unit Type:** Elderly/Disabled	**Capital Fund Allocation of Development:** TBD
Bedroom Type	**Number of Units**	**Number of Units**	**Unit Configuration**

	Pre-Conversion	Post-Conversion	Changes
Studio/Efficiency	0	TBD	N/A
1 Bedroom	47	At least 47	N/A
2 Bedroom	4	At least 4	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. Relocation plans will be developed as soon as possible for each development 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.

Resident Rights, Participation, Waiting List, and Grievance Procedures

Note: The following protections are statutory requirements under the Rental Assistance Demonstration (RAD). These rights are permanent and are recorded on the property deed to ensure they remain in place.

- **No Re-screening Upon Conversion:** Pursuant to RAD Statute, at conversion, current residents will not be subject to any new rescreening, income eligibility, or under-occupancy standards.
- **Right to Return:** Any resident who is temporarily relocated to facilitate rehabilitation or construction has a permanent, legally guaranteed right to return to an assisted unit at the site once the work is complete.
- **Rent Limitation:** Resident rent will continue to be based on **30% of adjusted gross household income**. If a resident's rent increases by more than 10% or $25 (whichever is greater) solely as a result of the conversion, the increase will be phased in over 3 to 5 years.

- **Renewal of Lease:** Under Section 8 rules (PBV or PBRA), the Project Owner **must** renew the resident's lease unless there is "good cause" for non-renewal (e.g., serious or repeated lease violations). You cannot be evicted simply because your lease "expired."
- **Resident Participation & Funding:** Residents have the right to establish and operate a resident organization. The PHA will provide **$25 per occupied unit, per year** specifically to support these resident participation activities.
- **Choice Mobility:** After a period of residency (12 months for PBV; 24 months for PBRA), residents have the right to request a portable Housing Choice Voucher to move into the private market, provided a voucher is available.
- **Extended Notice Period (Supplemental 4C Update):** In accordance with 2025 HUD requirements, all residents in RAD-converted units will receive a minimum of **30 days' advanced notice** for any lease termination due to non-payment of rent.

Significant Amendment Definition:

As part of the Rental Assistance Demonstration (RAD), Opportunity Home San Antonio is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

a. The decision to convert to Project Based Rental Assistance or Project Based Voucher Assistance;

b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;

c. Changes to the construction and rehabilitation plan for each approved RAD conversion;

and d. Changes to the financing structure for each approved RAD conversion.

OPPORTUNITY™ HOME SAN ANTONIO

A COMMUNITY OF POSSIBILITIES