

SAHA 2025

Impact and Innovation Plan

This year SAHA developed the one-year MTW Plan as an integral component of a five-year Strategic Plan. The new format is the result of a deliberate effort to more closely align the agency's various planning efforts. The annual MTW Plan is now documented as an appendix to the Agency five-year strategic plan. Appendices A through E comprise the entirety of the 50900 requirements.

As of February 21, 2020, when the five-year strategic plan document was released for public comment, implementation teams were still being defined and work was expected to be accomplished in the months of March and April. As a result of the global pandemic, this work has been delayed and in some cases is pivoting to ensure the Agency is meeting immediate needs. This plan will be finalized and updated in the months to come. The Agency is planning an unveiling at which time the full five-year strategic plan will be available at saha.org.

For purposes of ensuring continued program administration under the Moving to Work demonstration, the Agency has finalized the annual MTW Plan (attachment to the five-year strategic plan). The Annual MTW Plan describes the Agency's planned use of its Moving to Work flexibilities including MTW waiver requests and other required MTW information that will support the Agency's annual strategic implementation plan.

Strategic Plan DRAFT Released For Public Comment: February 21, 2020

Strategic Plan DRAFT Submitted to HUD for review: May 18, 2020

*FINAL MTW Plan (Appendices A and B) Submitted to HUD for approval: August 21, 2020,
September 18, 2020*

FINAL MTW Plan (Appendices A and B) Approved by HUD: September 22, 2020

SAHA 2020-2021 MTW PLAN

SAHA 2025 Appendices A-E

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Section I. Introduction

OVERVIEW OF SHORT-TERM AND LONG-TERM MTW GOALS AND OBJECTIVES

Short-term goals and objectives include those that Plan Year. Long-term goals and objectives include those that the MTW PHA plans to accomplish beyond the current Plan Year. MTW PHAs have the ability to define the level of specificity in the short-term and long-term goals and objectives. If the MTW PHA includes non- MTW components, the MTW PHA should clearly delineate which are MTW and which are non- MTW goals and objectives. MTW PHAs have the flexibility to include references to proposed and ongoing activities in this section if it assists in providing an explanation about short-term and long-term goals and objectives. However, this is not required.

SAHA 2025 SUMMARY

The 2025 Strategic Plan describes the agency's priorities for the next five years. It also describes how those priorities connect to a shared understanding of the environment in which the agency works (theory of change), the impact of the agency's work on the broader community, questions that are critical to research, and annual implementation strategies.

GUIDING PRINCIPLES AND STATEMENTS

- **Vision:** Create dynamic communities where people thrive.
- **Mission:** The San Antonio Housing Authority Provides quality affordable housing that is well integrated into the fabric of neighborhoods and serves as a foundation to improve lives and advance resident independence.
- **Impact Statement:** San Antonio Area has a high quality of life where all are thriving

LONG-TERM OUTCOMES

The strategic plan focuses on priority 2025 outcomes for two key populations, SAHA Clients and SAHA Staff. Six outcomes have been identified as high priorities for the years 2020-2025:

- Two Staff-focused outcomes
 - SAHA staff respect and value diversity and inclusion
 - SAHA staff thrive in career and professional work
- Four Client-focused outcomes
 - A supply of affordable quality units exist in sufficient quantities for SAHA Clients
 - SAHA clients live in quality affordable housing
 - SAHA Clients feel safe
 - SAHA Clients have access to sufficient utilities



Section II. General Housing Authority Operating Information

A. Housing Stock Information

At the beginning of FY2020, the agency had a total of 6,083 units in inventory and is expected to close the fiscal year with 6,059 units. Below is the list of changes.

The Agency is projecting to have 5,938 units in the Low Income Public Housing Program (LIPH, also referred to as public housing) by the end of FY2021.

The Agency is also looking into the possibility of bringing online additional ACC units (PH) that are authorized and have not been assigned. It is the Agency's understanding that if and when these ACC units are assigned to a property owned or being developed by SAHA, the Agency's PH unit inventory would increase.

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) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Total Public Housing Units to be Added in the Plan Year	0
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* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe: NA

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
Scattered Sites TX006000033	69	Pending HUD application and approval - high cost of managing and maintaining these units
Blue Ridge/vf/sf/palm Lake TX006000036	20 9 (SF) 11 (PL)	Mirasol - Westside Reinvestment Initiative / Homeownership
Tampico Warehouse	0	Pending HUD application and approval - Development of new multi-family apartment complex, est.200 units
Springview TX006000031 [Building B, C, Replacement Home]	32 18 (Bldg B) 7 (Bldg C) 7 (Replacement Home)	Building B/C: Planned new development - Our Lady of Charity Apartments, 93 tax-credit units Replacement Home: Section 32 Program / HOPE VI - Springview Homes Disposition



Victoria Courts Admin Building	0	Pending HUD application and approval - Victoria Commons master plan
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Total Public Housing Units to be Removed in the Plan Year	121
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iii. Planned New Project Based Vouchers (PBV)

SAHA plans to project-base forty-four (44) new housing choice vouchers in FY2021. If additional opportunities to project base housing choice vouchers at additional properties arise during FY2020, SAHA will report on any actions taken in a subsequent MTW Report.

Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (HAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
100 Labor (Name TBD)	44	No	100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately \$54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.

Planned Total Vouchers to be Newly Project-Based	44
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iv. Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

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	10	Leased / Issued	No	Beacon Community - supports Next Step Housing Program (FY21-1 Activity)
Rosemont at Highland Park	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)
St. John's Square	50	Leased / Issued	No	New downtown development -



				supports Time-limited Workforce Pilot Program (FY20-4 Activity)
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Planned Total Existing Project-Based Vouchers	155
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* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued

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

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
Victoria Plaza - total 185 units are currently offline due to a planned comprehensive modernization. It is anticipated that the property will begin re-occupancy in June 2020 and be fully occupied by October of the Plan Year FY2021. Tenant Protection Vouchers (TPV) - a total of 69 TPVs are expected to be added to the voucher portfolio as a result of the public housing scattered site disposition.

vi. General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR		
The San Antonio Housing Authority's capital expenditures during the plan year will be dedicated to capital improvement projects, A/E related costs, construction management fees, and operating-administration costs throughout the public housing portfolio. The capital plans will address Life-Safety repairs, comprehensive modernization and substantial renovations at several public housing developments. Other capital projects may be added based upon the results of the physical needs assessment study which should be completed in 2020.		
Planned Capital Improvements		
Property	Budget	Description
Cassiano	\$ 200,000	Foundation Repairs
College Park	\$ 75,000	Elevator #2 - Cylinder Replacement
Fair Avenue	\$ 152,065	Asbestos Consultant Services
Highview	\$ 161,200	Storm Drainage Repairs
L.C. Rutledge	\$ 905,637	Roof Replacement
Madonna	\$ 1,013,000	Gas-Boiler System Assessment and Replacement
Parkview	\$ 1,572,034	Roofing, Exterior Panels
San Pedro Arms	\$ 90,000	Elevator Modernization
Villa Tranchese	\$ 152,065	Asbestos Consultant Services
Victoria Plaza	\$ 1,200,000	Roof, Interior Upgrades, Sewer, Window Abatement
Cross Creek	\$ 114,00	Parking Lot Repairs
Mirasol Homes	\$ 1,209,800	Roof Repairs - Replacement



South San Apts.	\$ 161,200	Drainage Repairs
Sun Park Lane	\$ 90,000	Elevator Modernization
T.L. Shaley	\$ 280,000	Foundation Repair
Villa Veramendi	\$ 950,000	Roof Repairs and Replacement
W. C. White	\$ 225,000	HVAC Replacement
(1) Partial expenditures may carry over from FY19 to FY21..		

B. Leasing Information

i. Planned Number of Households Served

As detailed in the table below, SAHA plans to serve **18,305 MTW households** in fiscal year 2018-19, through both public housing, MTW Housing Choice Vouchers, and other families served as part of activity FY2011-1e.

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**
MTW Public Housing Units Leased	68,772	5,731
MTW Housing Choice Vouchers (HCV) Utilized	147,708	12,309
Local, Non-Traditional: Tenant-Based^	N/A	N/A
Local, Non-Traditional: Property-Based^	2,532	211
Local, Non-Traditional: Homeownership^	N/A	N/A

Planned Total Households Served	18,251
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* "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	N/A	N/A	N/A
Property-Based	FY2011-1e: Preservation & Expansion	2,532	211
Homeownership	N/A	N/A	N/A

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.



ii. Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	The Agency is currently undergoing waitlist maintenance and evaluating the eligibility process. As a result, new processes may be implemented to improve success rates.
MTW Housing Choice Voucher	The Agency continues to select applicants from the waitlist to ensure MTW baseline is met. In addition, the Agency implemented a pre-eligibility process to increase the voucher utilization success rate.
Local, Non-Traditional	None.

C. Waiting List Information

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
Section 8 Tenant Voucher	Voucher	9,280	Closed	Yes
La Posada Mod Rehab	Site-Based	19,321	Open	n/a
Prospect Hill Mod Rehab	Site-Based	241	Open	n/a
Serrento Mod Rehab	Site-Based	2,793	Open	n/a
Public Housing	Site-Based	31,857	Open	n/a
East Meadows Project Based Vouchers	Project Based Voucher Site Based	14,854	Open	n/a
Gardens at San Juan Project Based Vouchers	Project Based Voucher Site-Based	35,303	Open	n/a
Wheatley Park Senior Project Based Vouchers	Project Based Voucher Site-Based	272	Open	n/a
PBV Preferred Beacon	Project Based Voucher Site-Based, Referral-based	0	Open	n/a

Please describe any duplication of applicants across waiting lists:

Total number of unique applicants is 77,115 with each applicant averaging around 2 waiting list



applications each.

ii. Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Section 8 Tenant Voucher	The Agency plans to open the list when the wait time is less than 4 months for applicants.
La Posada Mod Rehab	None
Prospect Hill Mod Rehab	None
Serrento Mod Rehab	None
Public Housing	None
East Meadows Project Based Vouchers	None
Gardens at San Juan Project Based Vouchers	None
Wheatley Park Senior Project Based Vouchers	None
PBV Preferred Beacon	None



Section III. Proposed MTW Activities

The Agency is proposing four MTW activities for approval. First, the Agency is requesting an additional waiver under FY2015-3: Modified Project Based Vouchers (MPBV) to allow for alternative MPBV HAP contracts.

Secondly, the agency is requesting to relocate ten (10) MPBVs previously approved under FY2015-3: Modified Project Based Vouchers (MPBV) to a new activity, FY2021-1: Next Step Housing Program (THRU Project), with additional waivers. After a post-implementation review, the Agency and its partner, THRU Project, determined the program would be more successful with additional design elements that require additional waivers. As a result, a separate activity is being pursued to provide clarity and streamline administration of the program, associated waivers, and reporting.

The two additional proposed new MTW activities are direct responses to the COVID-19 pandemic. FY2021-2 provides rent forgiveness to public housing residents. FY2021-3 limits the amount of rent increase to HCV participants.

1. FY2015-3: Modified Project Based Vouchers (MPBV)

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

This activity was approved in FY2014-2015 and implemented in the same fiscal year. The Agency is seeking to amend this activity as follows:

Planned Non-Significant Changes

The Agency is relocating the ten (10) MPBVs previously approved under this activity to the proposed activity, FY2021-1: Next Step Housing Program (THRU Project).

The Agency has removed the plan to commit 30 modified project based vouchers to support a college homeless program at a tiny home development. This development is no longer moving forward.

The Agency plans to commit 44 modified project based vouchers at a new development. 100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately \$54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.

Planned Significant Changes

The Agency is seeking authorization 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 agency's goal to increase housing choice, this waiver will allow SAHA to analyze the MAFMRs and SAFMRs and use the higher payment standard on future MPBV contracts.

The Agency also seeks to waive the requirement that an independent entity must determine the initial contract rent and annual redetermination of rent. This waiver will allow SAHA to determine the contract rent in accordance with PBV regulations. Current regulations require SAHA to rely on a third-party to initiate the HAP contract and adjust the rent at any request for rental increase. PBV



regulations for determining rent to owner, on the other hand, specify that the amount of rent to owner must be set at the lower of:

- an amount based off payment standard minus UA;
- the reasonable rent (determined by a third party); or
- the rent requested by the owner.

Previous Fiscal Year Changes

This activity has been previously amended as follows:

- FY2019-2020:
 - Allocated eighty (80) additional project-based vouchers to support the follow initiatives:
 - THRU Project: Up to ten (10) modified PBVs at SAHA properties will be committed to support a local non-profit organization, THRU Project, in their mission to help foster youth aging out of the foster care system.
 - Family Homeless: Up to twenty (20) modified PBVs at SAHA properties will be committed to support the South Alamo Regional Alliance for the Homeless (SARAH). SARAH is the local Continuum of Care Lead Agency charge to create an improved service system that effectively provides support, coordination, and housing to all homeless populations within San Antonio and Bexar County, with a primary focus on moving individuals and families out of homelessness efficiently and permanently.
 - Beacon Communities or Partnerships: Up to fifty (50) modified PBVs at one of SAHA's Beacon or Partnership properties. These units will support a new workforce initiative as outlined in the proposed activity, FY2020-4: Time-Limited Workforce Housing Pilot Program.
 - Beacon Communities: Up to thirty (30) modified PBVs at a new SAHA - Beacon development. These units will support a new homeless college program as outlined in the proposed activity, FY2020-2: St. Phillips College Homeless Program (SPC-HP).
 - Adopted an alternative waitlist policy for the modified PBVs committed that support the THRU Project, Family Homeless Initiative, Workforce Initiative, and St. Phillips College Homeless Program so that the units would be reserved for direct referrals from these partners. (24 C.F.R. 983.251: How participants are selected)
 - Received waiver to remove the twenty-five percent (25%) per project cap for the Agency's modified project based units.

ii. Description/Update

Update: This activity is designed to meet the statutory objectives of increasing housing choices for low-income families and increasing cost effectiveness. This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing thereby increasing housing choices. Newly allocated modified project based vouchers (MPBV) approved under the FY2020 amendments have been allocated as follows:

- Family Homeless: Twenty (20) MPBVs were allocated to Rosemont at Highland Park, a property in the Agency's Beacon Communities Portfolio. Due to lack of vacancies, the Agency



plans to allocate these vouchers across multiple properties to ensure they are utilized and occupancy needs are met.

- FY2020-4: Time-Limited Workforce Housing Pilot Program: Fifty (50) PBVs have been allocated to St. John’s Square, a new property to be constructed under the Agency’s Partnerships Portfolio.

Description: This activity modifies the standard Project Based Voucher program in two ways.

First, this activity allows SAHA to commit vouchers to developments in SAHA’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 SAHA-assisted households) is not able to afford a tax credit rent affordable to a 30% AMI household.

SAHA may commit vouchers to San Juan Homes III, Wheatley Courts, Victoria Commons, or any other SAHA-owned or SAHA–controlled development. This activity applies only to commitment of vouchers to SAHA-owned or controlled units. Any commitment of vouchers to privately-owned developments will be made through a competitive process outside the scope of this activity.

Secondly, this activity also increases cost effectiveness by removing the automatic provision of a tenant-based voucher to a household who wishes to relocate from a unit associated with 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.

B. ACTIVITY METRICS INFORMATION

The Agency has updated existing benchmarks in accordance with the proposed changes.

HUD Standard Metrics: According to HUD guidance, this activity requires standard HUD metrics HC#1, CE#1, and CE#2.

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmarks
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box. Project-based Vouchers	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).
# of additional units made affordable to households based on their actual ability to pay (at or below 80% AMI)	0	up to 136

Data Source: This is tracked through data collection on the MTW-50058 in the Agency’s Housing Information System.



CE #1: Agency Cost Savings		
Unit of Measurement	Baseline	Benchmarks
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).
# of units * average per unit cost (PUC) * 12 months	\$0	\$0
# of units * contract rent * 12 months	TBD	\$5,000 reduction

Data Source: This is tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

CE #2: Staff Time Savings		
Unit of Measurement	Baseline	Benchmarks
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).
# of recertifications * average staff time per recertification (in hours)	0 hours	0 hours

Data Source: This is tracked through data collection on the MTW-50058 in the Agency's Housing Information System.

SAHA Metrics: The Agency tracks one additional metric in order to determine the impact of this activity on housing affordability.

Median household income		
Unit of Measurement	Baseline	Benchmarks
Median income of households living in local project based set-aside voucher units, by income bracket		
80% AMI	80% AMI	75% AMI
60% AMI	60% AMI	55% AMI
50% AMI	50% AMI	45% AMI
30% AMI	30% AMI	25% AMI

Data Source: This is tracked through data collection on the MTW-50058 in the Agency's Housing Information System.



C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

The waiver may have cost implications to the Agency when there is a larger variance between the metropolitan FMR and small area FMR. Below is an average per MPBV cost estimate per month. The Agency plans to manage this cost as part of the development financing.

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY2020 FMR	\$702	\$851	\$1,051	\$1,372	\$1,691
Average FY2020 SAFMR	\$736	\$895	\$1,105	\$1,442	\$1,777
Per MPBV additional cost per month	\$34	\$44	\$54	\$70	\$86

The Agency also anticipates a cost savings of about \$5,000 per year due to the increased flexibility on PBV rents.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.

Explanation <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i>	Attachment C Authorization <i>Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.</i>
NEW REQUESTED WAIVERS	
<p>Alternative contract rental agreement: The Agency is requesting this waiver to have the flexibility to determine the content of the contract rental agreements with the owner of the site project. This waiver is needed in order to have flexibility on setting payment standards and HAP contracts. In alignment with the agency’s goal to increase housing choice, this waiver will allow SAHA to analyze the MAFMRs and SAFMRs and use the higher payment standard.</p>	<p>Attachment C, Section D.2.b. Rent Policies and Term Limits The Agency is authorized 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. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24 C.F.R. 982.308, 982.451 and 983 Subpart E as necessary to implement the Agency’s Annual MTW Plan;</p>



EXISTING WAIVERS	
<p>Mobility restriction: The previously approved waiver allows the Agency to remove the mobility option associated with project based vouchers.</p>	<p>Attachment C, Section D.1.b Operational Policies and Procedures The Agency is authorized to determine the following basic operational policies and procedures for all Section 8 assistance the Agency is provided under section 8(o) of the 1937 Act:</p> <p>b. The Agency is authorized to determine the length of the lease period, when vouchers expire and when vouchers will be reissued. This authorization waives certain provisions of Sections 8(o)(7)(a), 8(o)(13)(F) and 8(o)(13)(G) of the 1937 Act and 24 C.F.R. 982.303, 982.309 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Project-based vouchers cap: The previously approved waiver allows the Agency to remove the project and program caps for the Agency’s modified project based units.</p>	<p>Attachment C, Section D.1.e The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base, and criteria for expending funds for physical improvements on those units that differs from the percentage and criteria requirements currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(13) of the 1937 Act and 24 C.F.R. 983 as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Waitlist procedures: The previously approved waiver allows the Agency to establish alternative waiting list policies that would establish a local preference for direct referrals from partners.</p>	<p>Attachment C, Section D.4: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Project-based Program: The previously approved waiver allows the Agency to project-base in SAHA-owned or SAHA -controlled properties.</p>	<p>(2) Attachment C, Section D.7.a Establishment of an Agency MTW Section 8 Project-Based Program The Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance, which includes the components set forth below:</p> <p>a. The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD’s requirements regarding subsidy layering. If the Agency chooses to</p>



	<p>project-base Section 8 assistance at such properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. The Agency may also waive the independent entity requirements for PHA-owned units. This authorization waives certain provisions of Sections 8(o)(11) and Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency’s Annual MTW Plan.</p>
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E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

Not Applicable.



2. FY2021-1: Next Step Housing Program (THRU Project)

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

The Agency is proposing to use its MTW flexibility to support a local partner, THRU Project, who provides supportive services to former foster youth.

Partner Program Overview

THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness¹. It will offer housing options and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth, in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and ultimately our most basic need; shelter. Each placement will focus on preparing the youth for living on their own while strengthening future families and breaking the negative cycles.

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

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

Activity Overview

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

SAHA is proposing to contribute up to 36 months of housing assistance to support youth being served by the Next Step Housing Program. Below is a summary of how SAHA's housing assistance will provide support.

Year 1 (12 months)

- Youth are enrolled in the Next Step Housing Program and receive housing assistance from SAHA through a modified project based voucher at Woodhill Apartments.
 - Youth will have rent calculated as prescribed in FY2014-6 Rent Reform and will also have their portion capped at \$100 -- SAHA 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.

¹ Youth may currently be in extended foster care.



- SAHA will also waive the initial rent burden rule which states that when a family initially leases and the gross rent of the unit exceeds the applicable payment standard for the family, the dwelling unit rent must not exceed 40 percent of the family's adjusted income.

Years 2 and 3 (24 months)

- Once youth complete the first year (12 months) Next Step Housing Program, they will have the option of continuing on housing assistance with a traditional tenant based voucher provided by SAHA.
 - Youth must be recommended by the partner for continuance in the voucher program
 - Youth will have access to the tenant-based voucher for an additional 24 months and will benefit from the choice to remain at Woodhill Apartments or move to another housing unit within SAHA's jurisdiction.
 - Youth will have their tenant rent portion calculated as prescribed in FY2014-6: HCV Rent Reform (consolidates previously approved activities FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule) and will NOT have their portion capped at \$100.

Alignment with other MTW activities

- Due to the nature of the program, youth will have an annual recertification every 12 months and will not follow alternative recertification processes established under FY2019-2: Alternate Recertification Process (PH and HCV).
- Youth admitted under this activity will follow the Agency's alternative implementation of small area fair market rents as established under FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity is designed to meet the statutory objective of increasing housing choices. The housing assistance provided by the Agency is intended to allocate vouchers to youth aging out of foster care who are at risk of homelessness. The voucher provides the youth the ability to lease decent, safe, affordable housing in the private housing market.

iii. Provide the anticipated schedule for implementing the proposed activity.

Currently, ten (10) modified project based vouchers have been allocated to this partnership as approved under FY2020 amendments to the FY2015-3 Modified Project Based Vouchers activity; however, there have been no youth enrolled. All new elements of the proposed activity are planned for implementation July 1, 2021 pending HUD approval. If the Agency enrolls new youth prior to implementation of the new activity, the youth will be transitioned to this activity.

B. ACTIVITY METRICS INFORMATION

HUD Standard Metrics

HC #1: Additional Units of Housing Made Available		
Unit of Measurement	Baseline	Benchmarks
Number of new housing units made available for households at or below 80%	Housing units of this type prior to implementation of the	Expected housing units of this type after



<i>AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.</i>	<i>activity (number). This number may be zero.</i>	<i>implementation of the activity (number).</i>
# of additional units made affordable to youth aging out of foster care	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30

Data Source: This is tracked through data collection on the MTW-50058 in the Agency’s Housing Information System.

HC #7: Households Assisted by Services that Increase Housing Choice		
Unit of Measurement	Baseline	Benchmarks
<i>Number of households receiving services aimed to increase housing choice (increase).</i>	<i>Households receiving this type of service prior to implementation of the activity (number). This number may be zero.</i>	<i>Expected number of households receiving these services after implementation of the activity (number).</i>
# of youth aging out of foster care receiving services aimed to increase housing choice	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30

Data Source: This is tracked through data collection on the MTW-50058 in the Agency’s Housing Information System. All students served in this program will receive these services.

SS #5: Households Assisted by Services that Increase Self Sufficiency		
Unit of Measurement	Baseline	Benchmarks
<i>Number of households receiving services aimed to increase self sufficiency (increase).</i>	<i>Households receiving self sufficiency services prior to implementation of the activity (number).</i>	<i>Expected number of households receiving self sufficiency services after implementation of the activity (number).</i>
# of youth aging out of foster care receiving services aimed to increase self sufficiency	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30

Data Source: This is tracked through data collection on the MTW-50058 in the Agency’s Housing Information System. All students served in this program will receive these services.

C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The Agency will incur additional HAP cost as a result of the rent cap established for year 1 of admission. Because there are only 10 MPBVs that will be occupied by a youth in their first year of admission at any given time, the financial cost will be limited.

ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how the MTW PHA will manage the surplus or deficit anticipated.

- A. Current average tenant rent at Woodhill Apartments: \$328
- B. Current average HAP at Woodhill Apartments: \$602

Estimated HAP cost without rent cap [C1]	Estimated HAP cost with rent cap [C2]	Additional HAP Cost Amount [Cost]
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\$602 X 10 MPBVs	$(\$328 - \$100) + \$602$ X 10 MPBVs	Cost = [C2] - [C1]
\$6,020 per month	\$8,300 per month	\$2,280 per month or \$27,360 per year

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

Explanation <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i>	Attachment C Authorization <i>Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.</i>
NEW REQUESTED WAIVERS	
<p>Rent reform: The Agency is requesting this new waiver in order to establish a new rent structure.</p> <p>This rent structure allows the agency to cap rent to \$100 in order to support the Next Step Housing Program design -- giving youth 1 year to save earnings and prepare for market housing. In addition, it eliminates the initial rent burden rule</p> <p>Year 1: FY2014-6: HCV Rent Reform applies with a cap rent of \$100, Initial rent burden cap of 40% is waived</p> <p>Years 2-3 (optional): FY2014-6: HCV Rent Reform applies</p>	<p>Attachment C, Section D.2. a Rent Policies and Term Limits</p> <p>a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Term limit: The Agency is requesting this new waiver in order to establish term limits.</p> <p>These term limits support the Next Step Housing Program design - 1 year. In addition, SAHA is opting to add 2 optional years to be consistent with other programs designed to target this population (ie. Family Unification Program)</p> <p>MPBV: 1 year TBV (optional): 2 years Total max term: 3 years</p>	<p>Attachment C, Section D.2. d Rent Policies and Term Limits</p> <p>d. The Agency is authorized to implement term limits for HCV units designated as part of the MTW demonstration. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 C.F.R. 982 Subpart L and 983 Subpart E as necessary to implement the Agency’s Annual MTW Plan.</p>
EXISTING WAIVERS - Previously approved in FY2015 and FY2020 Plans under FY2015-3: Modified Project Based Vouchers (MBPV)	



<p>Mobility restriction: The previously approved waiver allows the Agency to remove the mobility option associated with project based vouchers.</p> <p>This mobility restriction is needed to ensure youth maintain access to leveraged supportive services from the partner. After 1 year, the project restriction will be removed and a jurisdiction restriction will remain.</p> <p>FY2021 Update on use: Year 1: MPBV limited to SAHA property Year 2: TBV limited to SAHA jurisdiction</p>	<p>Attachment C, Section D.1.g Operational Policies and Procedures The Agency is authorized to determine the following basic operational policies and procedures for all Section 8 assistance the Agency is provided under section 8(o) of the 1937 Act: g. The Agency is authorized to establish its own portability policies with other MTW and non-MTW housing authorities. This authorization waives certain provisions of Section 8(r) of the 1937 Act and 24 C.F.R. 982 Subpart H as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Project-based vouchers cap: The previously approved waiver allows the Agency to remove the project and program caps for the Agency’s modified project based units.</p>	<p>Attachment C, Section D.1.e The Agency is authorized to determine the percentage of housing voucher assistance that it is permitted to project-base, and criteria for expending funds for physical improvements on those units that differs from the percentage and criteria requirements currently mandated in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Section 8(o)(13) of the 1937 Act and 24 C.F.R. 983 as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Waitlist procedures: The previously approved waiver allows the Agency to establish alternative waiting list policies that would establish a local preference for direct referrals from the partner.</p> <p>Referring partner: THRU Project</p>	<p>Attachment C, Section D.4: The Agency is authorized to determine waiting list procedures, tenant selection procedures and criteria and preferences, including authorizing vouchers for relocation of witnesses and victims of crime that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan.</p>
<p>Project-based Program: The previously approved waiver allows the Agency to project-base in SAHA-owned or SAHA -controlled properties.</p> <p>This waiver allows SAHA to allocated MPBVs to Woodhill Apartments, a property managed under SAHA’s non-profit portfolio Beacon Communities</p>	<p>(2) Attachment C, Section D.7.a Establishment of an Agency MTW Section 8 Project-Based Program The Agency is authorized to develop and adopt a reasonable policy and process for project-basing Section 8 tenant-based leased housing assistance, which includes the components set forth below: a. The Agency is authorized to project-base Section 8 assistance at properties owned directly or indirectly by the Agency that are not public housing, subject to HUD’s requirements regarding subsidy layering. If the Agency chooses to project-base Section 8 assistance at such</p>



	<p>properties, the Agency recognizes and accepts that such units would no longer be eligible for operating subsidy provided under Section 9(e) of the 1937 Housing Act or for future capital funds provided under section 9(d) for those units if it chooses to use this authorization. Project-based assistance for such owned units does not need to be competitively bid, nor are the owned units subject to any required assessments for voluntary conversion. This authorization waives certain provisions of Sections 8(o)(13)(B and D) of the 1937 Act and 24 C.F.R. 982.1, 982.102 and 24 C.F.R. Part 983 as necessary to implement the Agency’s Annual MTW Plan; specifically 24 C.F.R 983.56 Cap on number of PBV units in each project.</p>
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E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

i. IMPACT ANALYSIS

The MTW PHA may provide an impact analysis for each component of the rent reform activity or a comprehensive impact analysis of the rent reform activity. To assess the impacts of the rent reform activity, the following steps are suggested:

(1) A description of how the proposed MTW activity will impact household rent/tenant share.

The rent will be calculated as outlined in FY2014-6: HCV Rent Reform. In year 1, the client’s share will be capped to \$100. In years 2 and 3, no cap will apply. The activity also establishes a maximum of 3 years for housing assistance.

(2) A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.

Rent reform elements will be implemented on new admissions only. As youth are referred by the partner, they will be enrolled and follow the established rent rules. Tracking will take place in the Agency’s administrative housing software and other internal tracking mechanisms. The Agency will also establish points of contact for SAHA and its partner to monitor unintended consequences and impacts.

(3) A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)



This rent reform is being implemented with new admission only. See section C. Cost Implications above for an overview of the amount the rent/tenant share will be decreased in year 1 of admission.

(4) A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/ terminated/ reduced/ continued/ expanded.

The Agency will be working with the partner to ensure the allocated housing assistance is positively contributing to the partner's Next Step Housing Program. This effort will include regular partner meetings and shared reporting.

ii. HARDSHIP CASE CRITERIA

The MTW PHA must establish a hardship policy that clearly defines the circumstances under which households may be exempted or provided temporary relief from the activity. The MTW PHA must describe how such households could access the hardship policy and the associated process.

This Hardship Policy is designed to allow SAHA flexibility to address unique, unforeseeable circumstances that may occur and to protect families in crisis. SAHA plans to coordinate with the partner in hardship cases to coordinate response efforts.

Hardship Criteria and Remedies: The following categories of Hardship will apply to Next Step Housing Program participants:

- 1. Mobility restriction hardship:** Because the Agency is restricting mobility in year 1, the following hardship policy will be adopted.

Youth housed under the activity with either a project-based or tenant-based voucher may be given the opportunity to move to another unit and/or port out of SAHA's jurisdiction in the following cases:

- If the recipient has an approved reasonable accommodation need; or
- If the recipient requests an emergency transfer request under the VAWA Act of 2013. (see Exhibit 16-2 for SAHA Emergency Transfer Plan in SAHA's [Administrative Plan](#))

- 2. Time-limit hardship:** Because the Agency is limiting housing assistance to a maximum of three years, the following hardship policy will be adopted.

Youth housed under the activity and at the end of their maximum three year time-limit may be given the opportunity to extend assistance for an additional two years if the recipient is at imminent risk of homelessness as defined as:

- Individual or family who will imminently lose their primary nighttime residence, provided that:
 1. Residence will be lost within 14 days of the date of end of participation;
 2. No subsequent residence has been identified; and



3. The individual or family lacks the resources or support networks needed to obtain other permanent housing; or If the recipient requests an emergency transfer request under the VAWA Act of 2013.

3. Other circumstances: Determined by SAHA

Supporting Documentation Needed: Documentation (i.e. if for disability, proof of disability; if for hospitalization, hospitalization documentation)

Applying for Hardship: Next Step Housing Program participants must complete a hardship form and submit with supporting documentation to SAHA.

iii. DESCRIPTION OF ANNUAL REEVALUATION

The MTW PHA must provide an overview as to how the activity will be reevaluated on an annual basis in the Annual MTW Report, mitigating negative impacts and unintended consequences.

The Agency has established internal review processes that will encompass reviewing key HUD metrics, SAHA operational metrics, and Partner outcome metrics to assess whether the activity is achieving its intended outcome and developing mid-course corrections as needed.

iv. TRANSITION PERIOD

The MTW PHA must develop a plan and timeline for transitioning households into the activity. If a rent reform activity, the MTW PHA should show how the impact analysis informed this transition period

Clients will be enrolled into the program once the Agency has received the referral and determined eligibility.



4. FY2021-2: Limiting increases in rents

A. ACTIVITY DESCRIPTION

i. Describe the proposed activity.

The Agency is proposing to use its MTW flexibility to limit voucher contract rent increases to no more than 3%, in order to prevent terminations or evictions, and maintain a constant and predictable tenant rent. The Agency arrived at 3% by conducting a historical rent increase analysis. This activity will be sunsetted after 24 months, or sooner, if the national funding situation improves, and the agency is able to meet MTW requirements of serving substantially the same number of households.

Activity Overview

Recent weeks have seen historic levels of unemployment claims in San Antonio and throughout the country. SAHA has seen a spike in reports of loss of income from residents. At the same time, landlords are seeking to increase rents. The agency is concerned this will negatively impact tenants as SAHA may cover part of the increase (up to the payment standard) but tenants more than likely will receive an increase in their rent portion.

ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).

This activity is designed to increase housing choices for low-income families who might be experiencing a loss of income or other economic hardship, and are unable to pay additional rent.

iii. Provide the anticipated schedule for implementing the proposed activity.

This proposed activity would be ready for implementation July 1, 2020, pending HUD approval.

B. ACTIVITY METRICS INFORMATION

HUD Standard Metrics

HC #4: Displacement Prevention		
Unit of Measurement	Baseline	Benchmark
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).
# of households losing assistance due to non-payment of rent	# of households who lost assistance due to non-payment of rent in FY2020 (12-month avg?)	# of households who lost assistance due to non-payment of rent in FY2021 (12-month avg?)
Avg variation in rent, lease over lease [goal: Maintain client's tenant rent constant]	Avg tenant rent in FY2020 (TBD)	Avg tenant rent in FY2021 (TBD)



C. COST IMPLICATIONS

i. State whether the proposed activity will result in any cost implications (positive and/or negative) for the MTW PHA.

The agency anticipates, based on a sampling of requests for rental increases submitted in March, a monthly savings of \$118,642 in HAP and \$64,844 in rent portions for tenants.

D. NEED/JUSTIFICATION FOR MTW FLEXIBILITY

<p>Explanation <i>Explain why the cited authorization(s) is needed to engage in the proposed activity.</i></p>	<p>Attachment C Authorization <i>Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives the MTW PHA flexibility to conduct the proposed activity.</i></p>
<p>NEW REQUESTED WAIVERS</p>	
<p>Rent Policies: Allows the Agency to determine tenant rent and related policies.</p>	<p>Section D.2. HCV Rent Policies and Term Limits. a. The Agency is authorized to adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels for tenant-based assistance that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. The Agency is authorized to adopt and implement any reasonable policies to calculate the tenant portion of the rent that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations. This authorization waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, as necessary to implement the Agency’s Annual MTW Plan; b. The Agency is authorized 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. This authorization waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24 C.F.R. 982.308, 982.451 and 983 Subpart E as necessary to implement the Agency’s Annual MTW Plan</p>



E. RENT REFORM INFORMATION

HUD defines “rent reform” as any change to how rent/tenant share is calculated for a household that would not be allowable absent the MTW activity. Any MTW activity that an MTW PHA enacts that alters the rent calculation (the amount a household contributes towards their housing costs) would be considered a type of rent reform. The following information must be provided for all rent reform activities. In addition, any MTW activity that seeks to adopt a term limit in the public housing program must include information on items (ii)-(iv).

Not considered a rent reform activity.



Section IV. Approved MTW Activities

Below is a list of approved MTW activities and their general implementation status.

Current Activity	Status
11-1e- Preservation and Expansion of Affordable Housing	Ongoing
11-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	Ongoing
13-2- Simplified Earned Income Disregard (S-EID) (Public Housing)	Ongoing
13-4- HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Ongoing
14-2- Early Engagement	Ongoing
14-3- Faster Implementation of Payment Standard Decreases (HCV)	Ongoing
14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)	Ongoing
15-1- MDRC / HUD Rent Study	Ongoing
15-2- Elderly Admissions Preference at Select Public Housing Sites	Ongoing
15-3- Modified Project Based Vouchers	Ongoing
17-1- Time Limited Working Referral Program	Ongoing
17-2- Restorative Housing Pilot Program	Preparing to close out
19-1- Local Implementation of SAFMR	Ongoing
19-2- Alternate Recertification Process (PH and HCV)	Ongoing
20-1- Palo Alto College, College Homeless Assistance Program	Ongoing
20-2- St. Phillips College Homeless Program (SPC-HP)	Not yet Implemented
20-3- Family Self Sufficiency (FSS) Program Streamlining	Not yet Implemented
20-4- Time Limited Workforce Housing Pilot Program (PBV)	Not yet Implemented

On June 13, 2019, the Agency received HUD approval to extend specific MTW Agreement provisions to its HUD-VASH program. The Agency implemented the extension of these waivers in FY2020¹. Below is a list of MTW activities apply to each program.

- FY2019-1: Local SAFMR Implementation
- FY2019-2: Alternate Recertification Process

¹ Because these MTW regulatory waivers have been extended to the HUD-VASH program, activity-specific reporting includes households served by the HUD-VASH program and who are subject to the alternative MTW policies, HUD-VASH program participants are not considered MTW households and HUD-VASH program funding is not eligible for MTW funding fungibility. As such, other MTW reporting elements including MTW statutory requirements (ie, MTW households served) and MTW sources and uses exclude HUD-VASH program participants and funding.



- 14-6- HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)

A. Implemented Activities

1. FY2011-1e: Preservation and Expansion of Affordable Housing

i. Plan Year Approved, Implemented, Amended

This activity was approved and implemented in FY2010-2011 MTW Plan.

ii. Description/Update

Update: This activity is ongoing and continues to facilitate the expansion and preservation of affordable housing. The Agency has several projects in the development pipeline that will utilize MTW funding. These projects are not anticipated to come online until FY2022. (see Appendix D. Asset Management Plan for additional details on the Agency’s preservation and expansion plans)

Description: Under San Antonio Housing Authority’s (SAHA’s) broader uses of funds authority, Attachment D, the Agency may use MTW funding for local, non-traditional units providing that the activities meet the requirement of the MTW statute. While SAHA has had the authority to utilize this flexibility since 2011, the Agency has not utilized it for the construction of new units; all development reported under this activity in past years occurred outside the scope of MTW as it used other funding sources, including tax credits, HOME funding, CDBG and other local and state funding.

SAHA began utilizing this ability to fund local, non-traditional units in combination with a new flexibility to combine replacement housing factor (RHF) funds with the MTW block grant; the Agency executed an RHF amendment and RHF Plan that was approved by HUD in FY2014.

This activity operationalizes the expansion policies adopted in FY2011 by utilizing the local, non-traditional unit authorization under SAHA’s broader uses of funds authority and securing the approval to combine RHF funds into the MTW block grant, which requires the Agency to construct new affordable units (defined as units reserved for households with income at or below 80% AMI).

While SAHA may develop new communities with market-rate units in addition to affordable units, this activity does not authorize the use of MTW funds (including RHF funds) for the development of those market-rate units.

Important to note is SAHA’s flexibility to construct new Section 8 or 9 units that are authorized under MTW single-fund flexibility, and those outcomes are reported in the Sources and Uses of Funds section of this report (Section V.). The only units authorized under this activity FY2011-1e are those reserved for households with income at or below 80% AMI that receive no Section 8 or 9 funding.

This activity was revised for FY2016. Language describing Preservation and Expansion Policy context, background, and process was moved to Appendix 3. While the Preservation and Expansion Policy language can provide a helpful backdrop to the goals of FY2011-1e, it can also distract from the specific use of MTW flexibility. The language in FY2011-1e is now focused on the use of MTW funds to preserve or expand affordable housing units without any Section 8 or Section 9 subsidy. Since no preservation of non-Section 8 or 9 units is planned for FY2016, the metric “HC #2: Units of Housing Preserved” has been set to a benchmark of 0 (zero).



iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

Metrics will be updated to reflect MTW fund allocations described above.

v. Planned Significant Changes

None



2. FY2011-9: Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2010-2011 and implemented in the same fiscal year. This activity has been amended as follows:

- **FY2019-2020:**
 - Added up to forty (40) additional tenant-based vouchers to support a Permanent Supportive Housing (PSH) provider currently partnered with SAHA 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 SAHA set-aside voucher to another jurisdiction.
 - Adopted a hardship policy: a set-aside voucher recipient may be given the opportunity to port out of SAHA's jurisdiction in the following cases:
 - If the recipient has an approved reasonable accommodation need; or
 - If the recipient requests an emergency transfer request under the VAWA Act of 2013.

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to reduce homelessness in San Antonio by increasing housing choices. The new Move On Program was launched in January 2020.

Description: SAHA allocates up to 240 tenant-based vouchers for households referred by non-profit sponsors who commit to provide supportive services. The set-aside vouchers support two main programs:

- **The Set Aside Homeless Voucher (SHVP) Program:** The Set Aside Homeless Voucher Program (SHVP) provides rental voucher assistance to homeless individuals through a collaborative referral process. San Antonio Metropolitan Ministries (SAMMs) and the Center for Health Care Services (CHCS) screen applicants to ensure they meet all eligibility criteria and then forward referral packets to SAHA. A total of 200 vouchers have been allocated for the Set Aside Homeless Voucher Program (SHVP) program. Case management and supportive services are provided by CHCS and SAMMs.
- **Move On Program:** The Move On Program provides 40 tenant-based vouchers for families currently residing in Permanent Supportive Housing (PSH) to transition to subsidized housing. The program is designed to serve those who previously experienced chronic homelessness, been successfully served through PSH and will benefit from on-going housing subsidy to prevent a return to homelessness. Current partner is the South Alamo Regional Alliance for the Homeless (SARAH).

iii. Planned Non-Significant Changes

None



iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



3. FY2013-2: Simplified Earned Income Disregard (SEID)

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2012-2013 and implemented in FY2013-2014. This activity has been amended as follows:

- FY2014-2015: Removed Family Self-Sufficiency (FSS) from the list of approved self-sufficiency programs due to the Agency’s inability to reconcile FSS program requirements with this waiver.
- FY2015-2016: Established the requirement that families complete financial literacy classes.

ii. Description/Update

Update: This activity is ongoing and continues to provide an incentive to households who are engaged in a path to self-sufficiency. The Agency is actively seeking additional grant funding to support the possible expansion of approved self-sufficiency programs. The Agency expects enrollment to decline in the next fiscal year due to a large number of households coming up on year 5 of the program and limited number of new enrollees.

Statutory Goal	Housing Programs	Additional Requirements
<ul style="list-style-type: none"> ▪ Self-Sufficiency ▪ Cost Effectiveness 	<ul style="list-style-type: none"> ▪ MTW Housing Choice Voucher ▪ Public Housing 	<ul style="list-style-type: none"> ▪ Must complete financial literacy classes ▪ Must enroll in an approved self-sufficiency program ▪ Current approved programs: <ul style="list-style-type: none"> ▪ Westside Jobs Plus Program ▪ Annie E. Casey/East side Jobs Plus Program ▪ Self-sufficiency programs NOT approved: <ul style="list-style-type: none"> ▪ Family Self-Sufficiency (FSS) Program ▪ HUD Jobs-Plus at Cassiano Homes

This activity eliminated the traditional EID for all programs and established an alternative earned-income disregard (EID) for the MTW Housing Choice Voucher and Public Housing programs that requires enrollment in an approved self-sufficiency program. The alternative disregard expands the number of months for which EID (referred to as earned-income disregard or earned-income disallowance) is available from 24 months to 60 months, and makes the benefit available continuously during the 60 months, without start/stop. Head, Spouse or Co-head of Household qualifies entire household for SEID (formerly only Head of Household could participate). Income is disregarded on a sliding scale based on year(s) of participation:

- During year 1, 100% of earned income is disregarded
- Year 2: 80%
- Year 3: 60%
- Year 4: 40%
- Year 5: 20%

Participating households must attend quarterly financial counseling sessions in order to ensure that families are equipped with the tools and knowledge to budget effectively in preparation for the annual reduction of SEID, and to increase chances of success in achieving self sufficiency. At the time



of the referral, staff schedules an appointment with financial counseling providers such as Family Service Association or the Financial Empowerment Center. Participating households must attend the counseling sessions prior to the annual incremental reduction of EID, or within one month of the reduction being processed. Staff have access to the appointment log, and sign in sheets for financial counseling, and a very good relationship with counseling partners to obtain information on attendance.

Case management Staff monitor attendance, and follow up with members to ensure they are on track. Should they fail to attend, staff report back to management when a member lapses. A hardship provision allows a grace period for unforeseen circumstances.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



4. FY2013-4: HQS Inspection of SAHA-owned non-profits by SAHA inspectors

i. Plan Year Approved, Implemented, Amended

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2012-2013 MTW Plan. Implementation began on January 1, 2013.

ii. Description/Update

Update: This activity is ongoing. The Agency continues to experience cost efficiencies by conducting inspections of SAHA-owned nonprofits by SAHA Inspectors.

Description: This activity allows SAHA inspectors (instead of third-party contractors) to inspect and perform rent reasonableness assessments for units at properties that are either owned by SAHA under the Agency's non-profit portfolio or owned by a SAHA affiliate under the Agency's partnerships portfolio. At the time of implementation, SAHA's Inspections department was equipped to absorb the additional inspections without the need for additional full-time or part-time equivalent positions.

SAHA estimated that the impact to the Agency would be a cost savings of \$55.46 per inspection. This figure was the projected result of replacing third-party contractors with in-house inspectors. At the time this activity was adopted, the cost of contracting with a third party to conduct 2,391 inspections annually was \$182,478 per fiscal year, which translated into a cost per inspection of \$76.32. The cost per inspection using SAHA staff was estimated at \$20.86. The net savings per inspection was projected to be \$55.46.

As required by HUD, "CE #2: Staff Time Savings" has been added to this activity. While SAHA recognizes HUD's efforts to standardize metrics across MTW agencies, this metric is not in alignment with the nature of this activity. Agency cost savings in this activity is not the result of staff time savings, but instead of increased efficiency.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



5: FY2014-2: Early Engagement (EEP)

i. Plan Year Approved, Implemented, Amended

This activity is designed to increase housing choices by providing training to support successful participation in SAHA's Federal Housing Programs, and was originally approved as part of the FY2013-2014 MTW Plan and implemented in that fiscal year. After a hold period of several months during FY2015, this activity resumed in FY2016. The pause in the activity was due to prioritizing lease-up over other considerations.

ii. Description/Update

Update: This activity is ongoing and continues to provide applicants valuable training to be successful participants in the Agency's federal housing programs as they begin their path toward self-sufficiency. In FY2020, the Agency initiated a deep dive into policies, processes, and practices related to program exits. The purpose of the project is to gain a better understanding of events leading up to negative exits and what additional interventions the agency can leverage after EEP. This work will help inform whether the Agency will adjust the EEP and/or develop additional MTW initiatives.

Description: This activity establishes a requirement that applicants complete a defined set of courses upon admission to the Public Housing (PH) or Housing Choice Voucher (HCV) programs. Failure to attend a required EEP briefing may be cause for denial. The courses are designed to provide incoming families with the skills to be successful residents and tenants, while establishing clear expectations and minimizing the number of crisis situations over the long term. The curriculum is the product of formal partnerships with other agencies who participate as instructors or advisors in the design and implementation of the courses. Topics include finding the right home/neighborhood, working with landlords, financial literacy, fair housing, safety, upkeep and sustainability.

Elderly and disabled heads of households are exempt from the requirement, but encouraged to take the courses. Those who successfully complete the courses will receive a certificate.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

Remove the SAHA metric - "Percent of households who attended the program and subsequently exited the housing program for a negative reason (PH + HCV)".

During the deep dive discussions it became clear that EEP alone cannot reduce negative exits. SAHA is revisiting the EEP programming and will identify metrics that are better aligned with EEP's objectives, this may include tracking participant enrollment and participation in SAHA programs after attending EEP, housing stability for 6-12 months after EEP, etc.

Early Engagement lays the foundation of successful participation by informing clients of program requirements and introducing clients to SAHA and partner resources available. Early Engagement coupled with other preventive and intervention efforts may have a stronger probability of reducing negative exits. The agency will continue its deep dive to identify the appropriate preventive and intervention efforts to reduce negative exits and any relevant metrics associated with these efforts.



v. Planned Significant Changes

None



6. FY2014-3: Faster Implementation of Payment Standard Decreases (HCV)

i. Plan Year Approved, Implemented, Amended

This activity is designed to reduce cost and increase cost effectiveness, and was originally approved as part of the FY2013-2014 MTW Plan.

ii. Description/Update

Update: This activity is ongoing. We are implementing the appropriate payment standard at regular reexaminations and at moves, but not at interim reexaminations.

Description: Typically, when Fair Market Rent (FMR) is reduced and the payment standard is adjusted accordingly, the reduced payment standard is applied at each participant's second regular reexamination. This activity will allow SAHA 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, SAHA will provide the participant a 30-day notice of rental increase.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



7. FY2014-6: HCV Rent Reform (consolidates previously approved activities into one and renames it to clarify intent)

Previously approved

FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule

i. Plan Year Approved, Implemented, Amended

Both activities are designed to work together to reduce cost and increase cost effectiveness. For FY2014-6 Rent Simplification, the Agency received HUD approval as part of the FY2013-2014 Plan and began implementation in July 2014. For FY2015-4: Simplified Utility Allowance Schedule, the Agency received HUD approved as part of the FY2014-2015 MTW Plan and began implementation in January 2015.

This activity is designed to meet the statutory objective of increasing cost effectiveness, and was originally approved as part of the FY2014-2015 MTW Plan.

Note that this activity applies only to Housing Choice Voucher (HCV) program participants who are **not** part of FY2015-1 MDRC/HUD Rent Study. If a household is selected to participate in the control or treatment group of the Rent Study, they will be subject only to FY2015-1, and not this activity FY2014-6.

ii. Description/Update

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has two elements: (1) simplified rent calculation (previously approved under FY2014-6: Rent Simplification) and (2) simplified utility allowance schedule (previously approved under FY2015-4: Simplified Utility Allowance Schedule)

(1) Rent Simplification Description: Previously, rent calculation was based on 30% of the participant's adjusted monthly income. This activity lowers the percentage used to calculate rent to 27.5% of monthly gross income for all MTW HCV participants and new admissions, and eliminates deductions (i.e., medical and child care) with minimal impact to the participant's rent portion. Additionally, SAHA 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. SAHA will conduct time studies to verify the number of hours that staff spends calculating tenant rent portion. The quality control score will be obtained from an Access database..

(2) Description: Prior to this activity, the Agency conducted annual reviews and periodically re-established a Utility Allowance Schedule to represents 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 tenant, and type of appliances (gas/electric).



This activity establishes a new, simplified schedule that is based on the analysis of data collected from SAHA'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. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

Hardship Policy: Households that experience a rent increase of \$26 or more due to the rent simplification calculation will be granted a hardship exemption and have the household's TTP calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each annual and interim recertification

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.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

8. FY2015-1: MDRC / HUD Rent Study



i. Plan Year Approved, Implemented, Amended

This activity is designed to promote self-sufficiency, increase cost-effectiveness, and increase housing choices. It was originally approved as part of the FY2014-2015 MTW Plan.

ii. Description/Update

Update: This activity is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.

Description: San Antonio Housing Authority (SAHA) has been selected to participate in 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, is conducting the Study on behalf of HUD. The Study sets forth alternative rent calculation and recertification strategies that will be implemented at several public housing authorities across the country in order to fully test the policies nationally.

The goals of this alternative rent policy are to:

- Create a stronger financial incentive for tenants to work and advance toward self-sufficiency
- Simplify the administration of the HCV Program
- Reduce housing Agency administrative burden and costs
- Improve accuracy and compliance of program administration
- Remain cost neutral or generate savings in HAP expenditures relative to expenditures under traditional rules
- Improve transparency of the program requirements

A computer-generated program will randomly select the participants for the Study from the pool of eligible vouchers. The Study Group vouchers will be managed using the proposed policies. The Control Group vouchers will be managed using the existing policies. Eligible participants in both the Study and Control Groups will include only those with vouchers that are administered under the Moving To Work (MTW) Program and not currently utilizing a biennial certification. Non-MTW Vouchers (i.e., Veterans Affairs Supportive Housing, Moderate Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and HUD Project Based Vouchers are excluded from the Study. Additionally, the Study is focused on work-able populations and will not include Elderly Households, Disabled Households and households headed by people older than 56 years of age (who will become seniors during the course of the long-term study). Households currently participating in Family Self-sufficiency and Homeownership programs will not be included in the Study. Households that contain a mix of members with an immigration status that is eligible for housing assistance and immigration status that is non-eligible for housing assistance would not be included in the Study.

I. Description of Rent Reform Components

The Study is designed to test an alternative strategy to standard HUD operating rules for the HCV program. The proposed alternative rent policies will include the following five key features:



- 1) Simplify income determination and rent calculation of the household's Total Tenant Payment (TTP) and subsidy amount by:
 - a) Eliminating deductions and allowances,
 - b) Changing the percent of income from 30% of adjusted income to a maximum of 28% of gross income,
 - c) Ignoring income from assets when the asset value is less than \$25,000, and
 - d) Using retrospective gross income, i.e., 12-month "look-back" period and, in some cases, current/anticipated income in estimating a household's TTP and subsidy.
 - e) Capping the maximum initial rent burden at 40% of current gross monthly income.
- 2) Conduct triennial income recertifications, rather than annual recertifications, with provisions for interim recertifications and hardship remedies if income decreases.
- 3) Streamline interim certifications to eliminate income review for most household composition changes and moves to new units.
- 4) Require the TTP is the greater of 28% gross monthly income (see #1 above) or the minimum rent of \$100. A portion of the TTP will be paid directly to the landlord.
- 5) Simplify the policy for determining utility allowances.

Additionally, the Study will offer appropriate hardship protections to prevent any Study Group member from being unduly impacted as discussed in Section V below.

A. Description of the Rent Reform Activity

1) **Simplified Income Determination and Rent Calculation**

Under the current HUD regulations, the total tenant payment (TTP) is a calculation derived from the voucher household's 30% adjusted monthly income (gross income less HUD prescribed deductions and allowances). SAHA follows a process of interviewing the household to identify all sources of income and assets, then verifies the information and performs the final calculation. The process is complex and cumbersome, which increases the risk of errors. According to HUD's Occupancy Handbook, Chapter 5 "Determining Income and Calculating Rent," the most frequent errors found across PHAs are: Voucher holders failing to fully disclose income information, errors in identifying required income exclusions and incorrect calculations of deductions often resulting from failure to obtain third-party verification. The complexity makes the HCV program less transparent and understandable by the public, landlords and voucher holders.

2) **Elimination of Deductions**

SAHA proposes a new method of calculation, which eliminates the calculation of deductions and allowances in the determination of annual income.

a) Percent Annual Gross Income.

The Total Tenant Payment (TTP) rent calculation will be determined by establishing gross annual income and then determining the greater of 28% of the gross monthly income or the minimum rent of \$100.

b) Elimination of Income from Assets valued less than \$25,000

SAHA will eliminate the verification and calculation of income earned from household assets valued less than \$25,000. Households would not be required to document



assets worth less than that amount. This will reduce administrative costs and simplify the program for greater transparency and program compliance.

c) Review of Retrospective Income.

To establish annual gross income for the three-year certification period, SAHA will review the total household income without deductions for the twelve-month period prior to recertification, i.e., the “Retrospective Gross Income.” A household’s annual gross income will depend on its *Retrospective Gross Income* during a 12-month “look back” period.

At the certification, if a household’s current/anticipated income is less than its retrospective gross income by more than 10%, a “temporary” TTP based on current income alone will be set for six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average retrospective gross income. No interim recertification interview would be required to reset this TTP.

d) Capping the Initial Maximum Rent Burden

HUD places a maximum rent burden for households moving into a new unit under the housing choice voucher subsidy, which is determined to be 40 percent of the household’s adjusted annual income. However, under the Rent Reform Study, the PHA will no longer adjust household income using deductions and allowances. The household must not pay more than 40 percent of gross current monthly income for the family share when the family first receives voucher assistance in a particular unit. (This maximum rent burden requirement is not applicable at reexamination if the family stays in place).

3) Triennial Certifications

SAHA currently performs re-certification of HCV households on an annual basis. The annual certification will review program eligibility, household composition, income and other household circumstances. Additional re-examinations (“interim certifications”) may be required for changes in the household situation such as: composition, income, and change in unit.

SAHA proposes performing re-certification of the Study Group every third year (triennial). The triennial certification will review program eligibility, household composition, current income and income over the past twelve months (“retrospective income”), unit information and shall set the Total Tenant Portion (TTP) and the household share of the rent. The TTP for the Study Group will remain in effect during the three year certification period, with some exceptions related to decreases in income and changes in household.

Under the alternative rent policy, a household’s annual gross income will be determined using its reported (and verified) *retrospective gross income* during a 12-month “look-back” period. (In this calculation, gross income will exclude any prior income from sources that have expired for the household during that period, such as TANF or Unemployment Insurance benefits, since the household can no longer count on them. It will include imputed welfare income – i.e., any sanctioned portion of a household’s TANF grant). SAHA will create a local form to supplement the HUD form 9886 to provide tenant consent for SAHA to collect information relevant to the triennial recertification period.



If the household has an increase in income between certifications, the household's TTP will not be re-determined and increased to reflect the higher income. However, if the household has a decrease in income, the household may request and SAHA may provide an interim re-certification or other remedies under the hardship process (see Section V). The interim re-certification will be conducted when a household has a reduction of income of more than 10% from the retrospective gross income.

- a) SAHA interim certification will re-calculate the household TTP based on a new retrospective gross income review to determine the greater of 28% of the retrospective gross income or the minimum rent of \$100. This retrospective gross income will establish the TTP that will remain in effect until the sooner of the next triennial certification; or a tenant requested interim certification. The tenant may only request one interim certification per year. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later.
- b) At the triennial certification at the beginning of the three-year period (and at subsequent triennials) if a household's current/anticipated gross income is less than its retrospective gross income by more than 10%, the current income alone will be used to create a "temporary" TTP for a six-month grace period. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.
- c) At the initial triennial certification only, if a household's childcare expense exceeds \$200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the \$200 per month, to create a "temporary" TTP for a six-month grace period. SAHA defines reasonable childcare costs as less than \$3,000 per year for one child and \$6,000 per year for two children. After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined retrospective gross income. No interim recertification interview would be required to reset this TTP.
- d) The Study Group will be allowed one request per year for an interim certification to reset their TTP. The year period during which only one interim is permitted begins on the effective date of the triennial recertification and ends 12 months later. The TTP will only be reset if a household's new retrospective monthly income (at the time of the request) is more than 10% lower than its most recent prior retrospective gross monthly income. If the limit on interim certification presents a hardship, the household will need to apply for a Hardship Exemption (See Section V below).

4) **Streamline Interim Certifications**

SAHA will institute a streamlined interim certification process for the Study Group to report change of circumstance that does not require adjustment in subsidy. For these events, SAHA will not request income information. These events include:

- a) Changes to household composition. The Study Group must report both additions and removal of members to the household to SAHA to determine program eligibility and other HUD required reporting (e.g. deceased tenant reporting). However, unless the addition of an adult member changes the voucher bedroom size appropriate for the



household composition to prevent overcrowding or over-housing, SAHA will not request income information for the new household member until the next scheduled triennial certification.

If the loss of a household member results in a reduction of more than 10% of the most recent retrospective gross income, the household will be allowed to reset their TTP.

In the event that the new or removed member requires a change to the voucher bedroom size, SAHA will review the retrospective gross income of the newly added or removed household members, apply a new utility allowance, and will reset the household TTP. A reduction in subsidy for new voucher bedroom size will be implemented when the current lease ends and new lease begins.

Changes to household composition will not be counted towards the limit of one requested interim certification per year.

- b) Change of unit. Households seeking to move to a new unit will submit a request for move pursuant to current procedures. For households that move to more expensive units during three-year period, SAHA will absorb the higher contract rent costs up to the lesser of the gross rent or the payment standard, which is consistent with traditional rent rules. However, unless the request for move is due to a change in household composition, SAHA will not request income information or reset the household TTP until the sooner of the next scheduled triennial certification or tenant requested interim certification to reset TTP. SAHA will apply new utility allowance schedule, if any, to the household at the new lease effective date.
- c) Changes in Utility Allowances. When utility schedules are updated to reflect rate changes, utility allowances, and utility allowance payments (UAPs) will be adjusted only when HAP subsidies or TTPs are recalculated for other reasons. More specifically, updated utility schedules will be applied when households:
 - Change their contract rent,
 - Recertify and the TTP is recalculated during interim or triennial,
 - Move to new units, or
 - Change their household composition requiring a change in voucher size.

5) **Minimum Rent to Owner**

Currently, HUD does not require minimum rents to be paid by the voucher holder to the landlord. SAHA is proposing that Study Group members will be required to make a minimum payment of at least \$100 direct to the HCV landlord in addition to SAHA's portion of rent (Housing Assistance Payment "HAP"). The total amount of rent will equal the contract rent established in the lease. This policy mirrors the market system of tenants paying owners directly and creates a closer relationship and sense of responsibility for both the leaseholder HCV household and the property owner.

The amount of rent to owner the Study Group will pay is equal to their TTP less the Utility Allowance plus any amount over the payment standard for which the tenant may be responsible to pay. The Study Group rent to owner will not be less than the minimum rent. In the event that the Study Group household TTP less the Utility Allowance is less than the minimum rent, the household will pay the Owner the minimum rent and SAHA will reimburse the household the balance of the Utility Allowance. However, if the minimum



rent to owner exceeds 40% of the household current/anticipated gross income, the household may request a Hardship Exemption as detailed in Section V below.

6) Simplified Utility Allowance Schedule.

Currently, SAHA annually reviews and periodically re-establishes a Utility Allowance Schedule which represents the reasonable expectation of costs for utilities as part of the tenant’s lease.

The utility allowance is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric). The simplified schedule is based on the analysis of data collected from SAHA’s existing HCV portfolio including the most common structure and utility types. This new utility allowance schedule will be implemented upon the triennial certification or change of unit.

SAHA proposes a simplified schedule to reduce administrative costs and reduce errors associated with the traditional method of applying Utility Allowance Schedule. 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 the Study Group members who will be able to use this new schedule to clarify gross rent in their selection of housing units.

This schedule will be applied to the lesser of: the actual size of the unit or the size of the voucher rather than the larger of the actual unit size or the voucher size. SAHA will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

Proposed Flat Utility Allowance

Bedroom Size	Flat Rate
0	\$ 75
1	\$ 94
2	\$124
3	\$174
4	\$214
5	\$277
6	\$290
7	\$333

II. Hardship Policy

SAHA is participating in the Study in order to further the national discussion regarding the future of the Housing Choice Voucher Program. The alternative rent strategies are not intended to create an undue burden on the Study Group members. SAHA has established the following Hardship Policy for Study Group members. Households participating in the Study as part of the Control Group will be subject to the current SAHA policies.

A. Hardship Waiver Request Process.

The process for requesting a waiver will be as follows:

- 1) A household must initiate a request for a hardship waiver, by completing and submitting a written hardship request to Housing Assistant Specialist.



- 2) The household must supply information and documentation that supports a hardship claim with their written request. For example, a household must provide proof of the following: loss of eligibility for a federal state, or local assistance program; loss of employment or reduction in work hours; or the incapacitation or death of an income-earning household member and amount of lost income.
- 3) If a household claims zero income as part of its hardship request, it must provide a detailed accounting of funds used to cover basic costs of living (food, personal/family care necessities, etc.). This information must be provided every 90 days.
- 4) To request hardship based on the risk of eviction for non-payment of rent or utilities, a household must provide a copy of written 10 day notice from the landlord of non-payment of rent and the landlord's intent to terminate the household's tenancy, or a notice from a utilities company warning of a utilities shut-off. Tenant must promptly deliver the 10 day notice from the Landlord well in advance of a scheduled court date for eviction proceedings.

B. Hardship Waiver Criteria

SAHA may determine a financial hardship exists when the household cannot pay the minimum rent or has an excessive rent burden. Households will be considered for a hardship waiver, as discussed below, if:

- 1) The hardship cannot be remedied by the one interim recertification permitted each year (which cannot reduce a household's TTP below the minimum level).
- 2) The household is at an income level or experiences a loss of income and/or a TTP increase such that its total monthly TTP exceeds 40 percent of its current monthly gross income. The gross income will include imputed income in the same manner as current calculations.
- 3) The household faces risk of eviction for non-payment of rent – including utility shut-offs for non-payment of utility bills that could lead to eviction.
- 4) Other circumstances as determined by the housing Agency.

C. Hardship Review Process

- 1) The administrative review of the household circumstances will be conducted by SAHA according to current review processes.
- 2) For hardship claims related to imminent risk of eviction, SAHA will conduct an expedited hearing process.
- 3) Where a hardship request is denied, the household may request an independent review or hearing of its case through the housing Agency's normal grievance procedures.
- 4) SAHA will complete all information regarding the request for Hardship and the outcome in the system of record for tracking Hardship requests.

D. Hardship Remedies

- 1) The Hardship remedies may include any of the following:
 - a) Allowing an additional interim recertification beyond the normal one-per-year option. This could lower household's TTP (but only as low at the \$100 minimum TTP) until the next triennial recertification.
 - b) Setting the household's TTP at the minimum level for up to 90 days.
 - c) Setting the household's TTP at 28 percent of current income, for up to 180 days.



- d) Offering a “transfer voucher” to support a move to a more affordable unit (including a unit with lower utility expenses).
 - e) A specific time frame for the temporary TTP or minimum rent may be established for longer than 180 days based on specific circumstances. However, the time frame will never go past the triennial recertification date.
 - f) Any combination of the above remedies.
- 2) During the period when the TTP is reduced, the housing Agency will increase its payment to the landlord to cover the portion of the rent previously paid by the tenant directly to the landlord, and it will notify the landlord of the change and the time period of the increased payments.
 - 3) In addition to the remedy or remedies offered, the household may be referred to federal, state or local assistance programs to apply for assistance, or to obtain verification that they are ineligible to receive benefits.
 - 4) The Hardship remedies are subject to the following limitations:
 - a) The tenant portion of the rent payments will not be suspended prior to a hardship designation.
 - b) Remedies will not affect any rent attributable to a gross rent that exceeds the applicable payment standard.
 - c) Opting out of the alternative rent policy is not a remedy option.

E. End of Hardship Waiver Period

- 1) If the hardship continues, the household may submit a request for an extension of the hardship remedy. However, the time frame will never go past the triennial recertification date.
- 2) At the end of the hardship waiver period, the household’s regular TTP will be reinstated.

III. Transition Period

A. Selection of Participants

Study Participants will be randomly selected from the eligible vouchers through a computer generated random selection program. Eligible vouchers will specifically exclude the following:

- Vouchers not currently administered under the Moving to Work Program:
 - Veterans Affairs Supportive Housing (VASH)
 - Moderate Rehabilitation
 - Shelter Plus Care
 - Enhanced Vouchers
- HUD Project Based Vouchers
- Vouchers administered under portability
- Elderly households: Head of Household, co-head, spouse or single member households 62 years or older pursuant to the Administrative Plan
- Households headed by people older than 56 years of age (who will become seniors during the course of the long-term study).
- Disabled households: Head of Household, co-head, spouse or single member households with a disability as defined in the Administrative Plan
- Households currently participating in the Family Self-sufficiency Program
- Households participating in the Homeownership Program



- Households that contain a mix of eligible and non-eligible household members would not be included in the Study

B. Enrollment of Study Group members

1) Prior to Certification Meeting

Selected Study Group members will receive special information with their recertification package to introduce them to the rent reform policies and to answer household questions. SAHA will conduct the triennial certification at the time otherwise scheduled for the household annual certification.

2) During Certification Meeting

At the initial triennial certification, the household will have the changes in rent reform policies explained to them. They will be provided with a gift card as a nominal thank you for providing filling out a base information form.

Changes in the household share, TTP, utility schedule allowance will be provided to the household with no less than 30 days’ notice.

3) Mitigation of impact at initial triennial certification

A “grace period” of six months will be provided to mitigate the impact of the transition for the following two cases:

- a) At the triennial certification at the beginning of the three-year period (and at subsequent triennials), if a household’s current/anticipated income is less than its retrospective income by more than 10%, the current income alone will be used to create a “temporary” TTP for a six-month grace period.
- b) At the initial triennial certification only, if a household’s childcare expense is above \$200 per month, the gross income will be reduced by a deduction of reasonable childcare cost above the \$200 to create a “temporary” TTP for a six-month grace period.

After that grace period, the TTP will automatically be switched to the TTP amount based on the previously determined average prior income. No interim recertification interview would be required to reset this TTP.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



9. FY2015-2: Elderly Admissions Preference at Select Public Housing Sites

i. Plan Year Approved, Implemented, Amended

This activity is designed to meet the statutory objective of increasing housing choices for low-income families and was originally approved as part of the FY2014-2015 MTW Plan and implemented November 1, 2014.

ii. Description/Update

Update: This activity is ongoing and continues to allow the Agency to increase housing choices for elderly residents at selected public housing properties.

Description: This activity establishes a 4-to-1 elderly admissions preference at specific communities in order to increase housing choices for elderly households.

The goal of the activity is to address continuing concerns of elderly residents at specific communities regarding lifestyle conflicts between elderly and non-elderly residents. Property Management's ability to address these conflicts is reduced significantly when the ratio of non-elderly to elderly residents rises above a certain proportion. The 4-to-1 admissions preference is proposed in order to create and maintain an optimal mix of elderly and non-elderly residents in each community.

The idea of an optimal mix is based on research of the reaction to a 1995 Massachusetts law that attempted to limit the percentage of non-elderly disabled tenants living in state-funded elderly housing. In 2002, the Massachusetts Office of Legislative Research provided an update on the success of the 1995 law, which had established optimal proportions of 86.5% elderly and 13.5% non-elderly residents. Housing officials reported that the law had been largely successful in:

1. reducing the number of problems that arise from these mixed populations sharing the same housing;
2. slowing what had been a sharply increasing rate of non-elderly disabled households moving in, and
3. reducing the relatively high percentage of non-elderly disabled tenants in certain projects.

Housing advocates, however, suggested that the optimal proportion should be 80% elderly and 20% non-elderly residents. This MTW activity, FY2015-2, adopts that suggested 80/20 ratio both for its admissions preference as well as for its ultimate unit mix

In practical terms, this activity allows the selection of four elderly applicants from the waiting list before selecting a non-elderly applicant from the waiting list, until such time as an optimal mix of elderly and non-elderly disabled residents is reached for the community. SAHA will use a waiting list preference for elderly families to ensure properties are able to reach the target 80/20 ratio. No residents will be required to relocate in order to meet these targets. The Agency is not establishing a date by which to achieve the 80/20 target, and will rely solely on the normal resident turnover process to gradually transition the population balance.

When a property reaches its target 4-to-1 ratio of elderly to non-elderly residents, SAHA will start to draw applicants using a 1-to-1 ratio of elderly to non-elderly applicants in order to maintain the overall 4-to-1 balance. Should the mix ever tip in the other direction and start to house elderly residents at a



higher ratio than 4-to-1, then SAHA will draw non-elderly disabled residents at a higher rate than elderly residents in order to maintain the overall 4-to-1 balance.

The current properties with the Elderly Admissions Preference are: Fair Avenue, WC White, and Lewis Chatham.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



10. FY2015-3: Modified Project Based Vouchers (MBPV)

See Section 3 for proposed amendments.



11. FY2017-1: Thrive in Five Program (formerly referred to as Time-limited Working Household Referral Program)

i. Plan Year Approved, Implemented, Amended

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.

ii. Description/Update

Update: This activity is ongoing. In FY2020, the Agency initiated the development of an action plan to address low enrollment. To date, the team has developed an action plan and is currently executing it. The plan includes: executing an MOU with a second referral partner, strengthening communication with the current referral partner and internal departments, training, and new marketing strategies.

Description: This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, by providing working households in need of short-term housing assistance an opportunity to quickly access public housing units. This activity seeks to provide targeted assistance to a subset of households that 1) are working, and 2) would benefit from a period of increased housing stability to complete education/training, increase savings, or accomplish another self-sufficiency goal. These households will benefit from accelerated access to housing units, and, due to the time limit on the housing assistance, will transition out within 5 years. By focusing on households that have already started on the path to self-sufficiency, this activity should accelerate the number of households that actually transition to self-sufficiency during the period they receive housing assistance.

1. Overview

This activity provides time-limited public housing assistance to working households referred to SAHA by Workforce Solutions Alamo (WSA). Households referred to SAHA by WSA will receive five years of public housing assistance. If, at the end of five years, a hardship exists, two additional years of assistance are made available.

Upon starting housing assistance, participating households are required to enroll and participate in a SAHA self-sufficiency program such as Jobs-Plus or FSS.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2019-2). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

The total number of households to be served under this activity is currently capped at 200, and will be pulled in at a rate of 25 per quarter. Over 20,000 households are currently on the public housing waitlist. The 200 time-limited households represent 1% of that waitlist. As a result, providing these households with housing assistance will have a very limited impact on other households currently on the waitlist, especially at the draw rate of 25 per quarter. Additionally, it is expected that the



time-limited units will turn over faster than standard units, creating more housing opportunities in the long run.

However, SAHA is taking steps to minimize any short-term negative impacts to non-participants. SAHA will reach out to households currently in waitlist pools whose applications indicate that they are working to notify them of the opportunity provided by this new program. Also, properties with extremely long wait times are being made unavailable to time-limited households, in order to not extend the already long wait times even longer.

2. Previous Pilot

Previously, a pilot project (MTW Activity FY2013-1) was approved as part of the FY2013 MTW Plan. The pilot ended in FY2016. FY2013-1 is now closed out and is replaced with this activity, FY2017-1. This activity builds on the lessons learned from the pilot. Some of those lessons included:

- The pilot activity relied on applicants self-identifying as working households during the application process. A wait list preference was provided to these applicants. However, many applicants that selected the working household preference were in fact not actually working. As a result, staff and applicants spent valuable time in initial meetings that did not result in successful placements. This new activity addresses this challenge by removing the preference. In its place, households will be eligible for a time-limited unit if they are referred by a partner workforce agency.
- Pilot households were required to participate in FSS or similar self-sufficiency activity, but did not always do so. Staff identified a number of factors, including: lack of clear communication and immediate follow up on the requirement, pilot households living in elderly communities (where there are no FSS or Jobs-Plus staff), and the novelty of the requirement (for both staff and applicants). The new activity addresses these factors by partnering closely with workforce partners who will assist in communication, as well as increased understanding of what training areas need to be emphasized.

Activity elements that remain consistent with the pilot include:

- Working households who participate in this activity will receive five years of housing assistance, with a two-year extension if needed based on hardship.
- Hardship policies mirror FSS practices and policies: SAHA can extend the term of the assistance up to 2 years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.
- FSS or Jobs-Plus participation is required -- each FSS and Jobs-Plus family receives case management services from a Case Manager who maintains close communication with the family and works with them to develop individualized plans. These plans establish specific interim and final goals to measure the family's progress toward fulfilling its obligations and becoming self-sufficient.

Changes and new elements that will be incorporated into the MTW Activity to improve program outcomes include:

- The pilot had been oriented to increasing housing choice and self-sufficiency. Now that this activity is referral-driven (instead of wait list preference-driven), the rationale for increasing housing choice by decreasing wait list time is no longer applicable. Instead, the activity will be focused solely on self-sufficiency.



- Households that participated in the previous pilot and remain in good standing will be rolled over automatically into the new program, and their time spent in the pilot will not count against the five-year time limit (the “clock is reset”)
- SAHA and WSA staff are developing a branding and communication strategy regarding the referral program
- SAHA staff will increase messaging of requirements and time limits backed up with strong written policies and procedures
- CDI and PH staff coordinate activities using a master tracking worksheet, that tracks the following:
 - Specific instances when the 5-year term limit is being communicated to participating households
 - If the family refuses to participate in FSS, CDI will inform PH staff, who will initiate eviction proceedings
 - Whether the household is meeting the financial counseling requirement
 - Household cohorts
 - New strategies employed as part of the Individual Plan development (for example, it was discussed that the goals should be focused on how much money it will take for the household to be able to pay flat rent by their 5th year)
 - Hardship tracking process, including all hardships requested
 - Improve methods to ensure families are complying with the rules of the pilot (including retaining employment throughout)
 - Develop a procedure for households moving to section 8

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



12. FY2017-2: Restorative Housing Pilot Program

i. Plan Year Approved, Implemented, Amended

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.

ii. Description/Update

Update: The Agency plans to sunset this activity by the end of FY2020. Currently, the Agency is working with its partners to establish a close out process that will allow referrals to be received until April 2020. All probationers enrolled will maintain access to SAHA case management on a voluntary basis. All other program requirements will cease once the pilot program has ended. A full close-out report will be provided in the FY2020 MTW Report.

Description: This activity is designed to achieve the MTW statutory objective to give incentives that promote self-sufficiency, through resident services initiatives that provide eligible probationers and their families a public housing preference. This activity identifies a population of underserved residents – probationers – who currently face challenges securing stable housing. By providing a public housing preference, these households can more quickly establish a solid foundation from which to undertake subsequent reintegration and self-sufficiency goals

This activity is a two-year pilot program that will allow for up to 50 adult probationers who are reporting as part of the “Resurgence Collaborative” reentry initiative to have preference for housing on SAHA public housing properties. Probationers will be selected for application into the pilot by the Bexar County Community Supervision and Corrections Department (CSCD). Probationers in the pilot will receive dual case management support from the SAHA FSS Program and their Community Supervision Officer (CSO). The two-year term of the pilot program does not restrict how long residents will be able to continue to receive housing assistance.

The total number of households to be served under this activity is currently capped at 50. Over 20,000 households are currently on the public housing waitlist. Providing probationers and their households with housing assistance will have a very limited impact on other households currently on the waitlist.

Households will typically use the conventional public housing rent structure and biennial recertification schedule (per MTW Activity FY2014-4). However, both structure and schedule will be affected by the requirements of the self-sufficiency program selected by the household. For example, those enrolled in FSS will make use of an escrow account. Those in Jobs-Plus will have the option to establish an Earned Income Disregard (EID). For households living in Cassiano, the new Cassiano Jobs-Plus program will require an EID.

1. Target Population

Bexar County CSCD will select eligible probationers for the pilot based on the Texas Risk Assessment System (TRAS) in order to identify probationers with high housing “needs” and a relatively low risk of reoffending. Probationers identified with a high housing need and low risk will be screened by their CSO for SAHA’s income requirements and disability status to determine their eligibility for SAHA assistance. If the probationer meets SAHA’s income requirements they will be offered to apply for the



Pilot via the Referral Form. The probationer's total criminal history will be taken into account for these risk assessments.

2. Criminal History Review

Probationers will be selected for application to the pilot by the Bexar County Community Supervision and Corrections. Only Bexar County adult probationers currently serving a probation sentence for an allowable offense (Class B misdemeanor, nonviolent Class A misdemeanor, lowest-level controlled substance possession offense, or a first-time burglary offense) will be eligible for the pilot program. Probationers concurrently serving three or more separate probation sentences for allowable offenses or a single probation term for three or more allowable offenses will be ineligible for the Pilot. An exemption to current SAHA Screening and Eviction Guidelines will be required to allow some participants in the Pilot population to avoid automatic denial.

Probationers with a criminal history that includes narcotics distribution, violent felonies, or multiple burglary offenses at any time will be ineligible. Probationers with any allowable offenses within the past five years for which they are not currently serving a probation sentence for will also be ineligible unless the probationer successfully completed a probation sentence(s) for the offense(s) in question. Federal bans on sex offenders and persons convicted of drug manufacturing on federal property remain. In addition, people previously evicted from federally-assisted housing or who have committed crimes on SAHA property in the past will be ineligible for the Pilot.

3. Dual Case Management

Probationers selected for the pilot will be dual-case managed by a SAHA FSS Case Worker and their CSO. FSS will attempt to use only one or two case managers for the Pilot population as will the Bexar County CSCD. Selected probationers must be willing to engage in FSS case management for up to 5 years and if they unilaterally terminate case management they may be evicted. Selected probationers in the Pilot will receive a FSS case manager upon entering public housing, and the FSS case manager's role will be to supervise and motivate clients in conjunction with the CSO. Bexar County CSOs will have the final say on what court-ordered services must be completed and in what order, though the FSS case manager and CSO should coordinate and jointly agree on non-court ordered services and supervision. Selected probationers will be required to report to a CSO at the Barbara Jordan Center location in order to utilize services at the Resurgence Collaborative.

The SAHA FSS Case Manager would work to be present and present materials at SAHA-based hearings related to a Pilot participant; the Bexar County CSO would handle criminal and court-related matters pertaining to offenses probationers in the Pilot may commit. Both case managers should coordinate efforts and meet on at least a monthly basis to review problem cases and problem-solve.

The FSS Case Managers will also coordinate with property managers to address problems as needed. Scheduled meetings with clients do not have to be attended by both managers but efforts and communication should be coordinated so as not to confuse or mislead clients. SAHA will track the results of this Pilot with Bexar County CSCD through the FSS program.

4. Pilot Requirements

The probationers must also stay in good standing with their probation requirements (including substance monitoring and home inspections). Probationers rearrested for violations of their current probation or new criminal offenses may be swiftly evicted from public housing and removed from the



lease if determined by their CSO and SAHA. Family members would not be subjected to eviction if another adult in the household is capable of taking over the lease, unless otherwise determined by SAHA and the Bexar County CSCD.

Pilot Probationers who must go to residential drug treatment will not forfeit their public housing unit provided they have other immediate family members already living in the unit and capable of maintaining the lease. Probationers exiting residential drug treatment would still be able to apply to the pilot, if all other eligibility requirements are met. An MOU will be created for the Pilot to share information between SAHA and the Bexar County CSCD. In addition to the MOU the participating probationers will be required to sign a release of information form in order for the CSCD to share any case specific information (i.e. drug tests) with the SAHA case manager.

Probationers who are evicted due to an arrest or violation will be ineligible to apply for the Pilot in the future. Evicted probationers' spots in the Pilot will be recycled into the population cap for each pilot program. The same will apply for those probationers who leave public housing either voluntarily or through increased self-sufficiency. Individuals who finish their probation requirements may still be required to meet with a FSS case manager, and their spot will be recycled into the Pilot population cap.

Probationers will be required to obtain services at the "Resurgence Collaborative" at the Barbara Jordan Center determined by their FSS case manager and CSO. Services not provided at the Resurgence Collaborative may be completed through FSS/Probation's existing network of services providers. In addition, the FSS case manager will work to engage family members in services offered at the Resurgence Collaborative to build self-sufficiency in the entire family.

5. Pilot Logistics

Up to 50 probationers reporting as part of the "Resurgence Collaborative" reentry initiative and their immediate families will be allowed prioritized access to public housing at SAHA properties over a two-year period. The population cap of 50 will include both probationers coming into new public housing units with their families and probationers who are being allowed to move in with immediate family members that are already living in public housing properties.

Probationers selected for the Pilot will be given a signed referral from their CSO to present to SAHA staff at the Unified Application Center. The Referral Form will be created specifically for this Pilot and will be based on similar referrals for other SAHA special populations/projects. If probationers apply to the Pilot and their term of probation expires before a spot in the Pilot becomes open, their Referral will expire and they will have to reapply to obtain SAHA housing assistance. Probationers who commit a crime after being accepted into the Pilot but before moving into their unit will be removed from the Pilot.

6. Outcomes

According to 2012 Byrne CJJ Grant Implementation Plan Data collected by Trinity University, the Choice Neighborhood footprint (location of the Resurgence Collaborative), offenders in the footprint have higher rates of recidivism (re-arrests) and a higher arrest rate. The number of people per ZIP code on probation in the footprint is twice that compared to other ZIP codes in Bexar County. Additionally 52% of probationers who live in these ZIP codes had their probation revoked instead of completed, compared to 41% for Bexar County as a whole. Focus groups conducted by Trinity University with probationers also found that transportation is one of the most significant barriers for



probationers. Together this baseline data illustrates that the Choice Neighborhood has a higher percentage of probationers, these probationers struggle with basic needs such as transportation, and these probationers have their probation revoked or re-offend at a greater rate than Bexar County as a whole.

The program is anticipated to reduce recidivism among probationers. The prioritized access to housing in the Pilot will also allow SAHA to determine the effect of immediate housing on probationers in regards to such measures.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



13. FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation

i. Plan Year Approved, Implemented, Amended

This activity was approved in FY2018-2019 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.

ii. Description/Update

Update: This activity is ongoing and continues to assist the Agency in its efforts to increase housing choices. Phase II was implemented for new admissions and movers effective January 1, 2020 and recertifications effective February 1, 2020.

Description: This activity is designed to achieve the MTW statutory objective to increase housing choices for low-income families, by creating payment standards that better reflect market conditions in different parts of San Antonio, and so making a larger number of San Antonio neighborhoods affordable for voucher households. This activity is a local implementation of HUD's Small Area Fair Market Rents (SAFMR).

Because of the potential impact (positive and negative) on a large number of voucher households, SAHA 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 Agency used in the development of the activity:

1. Maintain Number of Households Served
 - a. No decrease in capacity to serve the same number of households
2. Minimize Negative Impact
 - a. Minimize negative impact for existing households in low-cost neighborhoods
 - b. No disparate impact on protected classes, including locally recognized classes (sexual orientation, gender identity, veteran status, and age)
3. Make the SAFMR as easy to use as possible
 - a. Households and landlords have limited time and resources; program design should facilitate program implementation
4. Leverage the Value of the Voucher
 - a. Maximize value of vouchers in targeted growth areas and rapidly changing neighborhoods



Local Submarket Payment Standards: This activity makes use of one waiver: establish local submarket payment standards.

Currently, the Department of Housing and Urban Development (HUD) publishes fair market rents (MAFMRs) annually for each metropolitan statistical area in the United States and requires each housing authority to adopt a payment standard schedule for each MAFMR area in its jurisdiction. HUD allows housing authorities to establish the payment standard amounts at any level between 90% and 110% of the published FMR. Payment Standards are used to calculate the maximum subsidy that the PHA will pay each month toward rent and utilities for families with Housing Choice Vouchers.

Prior to the implementation of SAFMR, the process for establishing payment standards includes analyzing the published MAFMRs when published, presenting the recommended schedule to the Board of Commissioners for approval, and implementing the new schedule over a twelve month phase-in for clients that have a reexaminations and all new admission contracts effective on or after the effective date. Due to biennial and triennial recertifications under the agencies MTW status, the impact to HAP expenditures are typically phased-in over a period of three years.

Under the new Small Area Fair Market (SAFMR) regulation, the San Antonio Housing Authority 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 Agency is designated as a Moving to Work (MTW) Program, it is authorized to adopt and implement any reasonable policy to establish payment standards for housing choice vouchers that differ from the currently mandated program requirements. The Agency requested and received a waiver in Year 1 (FY2018-2019).

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

Zip Code Grouping methodology: The Agency explored a variety of grouping options ranging from five to fifteen groups using a cluster analysis based on the published HUD SAFMRs. The goal of the clustering was to minimize within tier rent differences and maximize between tier differences. This would ensure that when the payment standard was set for each tier, it would be an appropriate amount for all zip codes within the tier. The ten tier option was chosen after considering administrative burden, financial impact, and after building consensus with local stakeholders. In addition, the Agency 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 SAHA's MTW implementation of SAFMRs. .

Payment Standard methodology: The Agency reviewed various methods for setting the payment standard in each Tier. The goal of the review was to establish a method that allowed the Agency to consistently determine payment standards for each tier and bedroom size while also balancing the financial impact. The method that found the balance between the financial impact and the goals of the SAFMR policy was determined to be ninety percent (90%) of the minimum SAFMR within each



Tier. For example, in Tier 1 there are seven (7) ZCTAs. The minimum or lowest SAFMR for a two-bedroom among these seven zctas is \$790. The payment standard for the two-bedroom is set to ninety percent (90%) of \$790, or \$711. This method was applied to all ten tiers and all bedroom sizes.

Exception Overlay methodology: The intent of the exception overlay is to establish a mechanism that provides greater flexibility to adjust payment standard schedules to mitigate involuntary displacement in rapidly changing markets and/or coordinate support for place-based redevelopment or revitalization initiatives (such as Choice Neighborhood). The overlay can include entire ZIP codes or smaller geographies such as census blocks, tracts, and locally defined neighborhoods. Areas are selected based on timely market information and other local information that support the need for a higher payment standard.

The Agency established an exception overlay in FY2018 that consisted of seven (7) ZCTAs. These areas were selected after reviewing a City of San Antonio report on housing vulnerability that highlighted areas where property values had risen the fastest in the city.

As part of the update to Phase II, the Agency reviewed additional available data including change in land value, home value, gross rents and determined that only minor updates to the current overlay were justified. Two ZCTAs (78215 and 78235) were removed from the overlay because there were no voucher holders. Thus, the need for involuntary displacement of existing voucher clients is not appropriate; rather, the goal for these ZCTAs is to make them more accessible to new clients through the new tiered system. Both ZCTAs are now in tiers with substantially higher payment standards than the current payment standards.

The Agency has also developed a list of ZCTAs that are anticipated to experience market pressures in the near future. As an early warning mechanism, these areas will be monitored closely during Phase II in addition to the relief provided under the exception overlay policy. The Agency may conduct targeted market studies to determine if any area needs to be added to the exception overlay and/or moved to a higher payment standard tier.

Hardship policies: This activity is not expected to impact existing clients tenant share; however, the Agency 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.

SAHA'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 Agency has two MTW activities with special hardship policies: FY2014-6: Rent Simplification and FY2015-1: MDRC/HUD Rent Reform Study. Hardships outlined in those activities will apply under this activity. Please refer to the MTW activities listed above in Section 4 of this plan for specific hardship criteria. Unless otherwise noted, all elements are applicable for all three activities.

The agency 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), SAHA will not reduce the payment standard amount for as long as the HAP contract remains in effect.



Exception Overlay Policy

- A. Exception Overlay Policy:** Households will receive automatic exception overlay relief, as discussed below, if:
- a. The household is currently under contract for a unit located in the Agency's exception overlay.
 - b. The landlord requests an increase in the rent amount after the first contract year and the new contract rent is determined to be reasonable through the Agency's rent reasonableness process.
 - c. The household's new total monthly family contribution as a percent of household income (rent burden) increases by more than 10% from the current rent burden and the household realizes it's unable to afford their rent portion as a result of the increased contract rent.
 - d. The new monthly increase is not a result of a change in household circumstances.
- B. Exception Overlay Policy Remedy:**
- a. SAHA will cap the total monthly family contribution at the current amount for the remaining months in their current lease term.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

The Agency plans to update metrics to account for the application of this activity to the HUD-VASH program.

v. Planned Significant Changes

None



14. FY2019-2: Alternate Recertification Process (PH and HCV)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by providing an alternate schedule for the annual reexamination process, specific PH review procedures, and certification methods of income and assets. The use of oral verifications reduces SAHA's administrative costs for postage, paper and envelopes when mailing written third party verification to the client's employer. The activity was approved in the FY2018-2019 MTW Plan and implemented in FY2018-2019.

ii. Description/Update

Update: This activity is ongoing and continues to minimize administrative costs minimal to no impact to residents.

This activity has three main components that are designed to streamline and simplify the recertification process: (1) alternate schedule, (2) alternate public housing review procedures, and (3) alternate income verification methods. It consolidates and updates three previously approved activities related to the first two elements (FY2014-4 Biennial Reexaminations, FY2014-5 Triennial Reexaminations, and FY2016-2 Biennial and Triennial Notification of Rent Type Option) and adds a new waiver for the third element.

(1) Alternate Recertification Schedule (PH and HCV)

This proposed activity establishes biennial and triennial schedules for reexaminations for the low income public housing and housing choice voucher programs. The Agency has been using alternative schedules since 2011; this new activity streamlines the schedules across both programs. The effective change will move approximately half of public housing households from biennials to triennials; the other half of public housing households will remain on the biennial schedule. The housing choice voucher program will continue current biennial and triennial reexamination schedules. Every household will have the option of interim reexamination if there is a change in household composition or income according to HCV and PH policy.

Beginning FY2016, SAHA created a local form with an expiration date of 39 months to replace the HUD-9886 Form with its 15 month expiration date. In the future, SAHA may create its own local forms with different expiration dates or other elements to accommodate this activity.

Definitions: For purposes of assigning a recertification schedule to each household, the Agency will utilize the following to apply the two schedules:

Triennial: A household is eligible for a triennial schedule if the household has at least one elderly or disabled household member and the household receives 100% of their income from fixed sources. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.

Biennial: Households not eligible for a triennial schedule are eligible for a biennial schedule.

(2) Alternate PH Review Procedures (PH only)



Typically in the low income public housing program, PHAs are required to inform public housing residents of the option of paying income-based rent or a flat rent on an annual cycle. Additionally, PHAs are obligated to conduct annual updates of family composition for these public housing families who have chosen to pay flat rent regardless of HUD-allowed triennial recertifications for those families.

As residents move to biennial and triennial recertification schedules, it becomes more efficient to coordinate notification and update requirements in accordance with their new recertification schedules. Therefore, SAHA proposes 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)

Currently, SAHA accepts self-certification for assets valued below \$5,000. In order to further streamline administrative processes, SAHA will accept the family's self-certification of the value of family assets and anticipated asset income for net assets totaling \$25,000 or less. Third-party verification of assets is still required for assets totaling a value more than \$25,000.

According to HUD's Verification Hierarchy, SAHA must send a form to third-party sources for verification of income if the tenant-provided documents are not acceptable or are disputed. In order to increase the rate of files completed in a timely manner, SAHA will skip the third-party verification form and instead use oral third party verification when tenant-provided documents are unacceptable.

In addition to streamlining methods of document verification, SAHA wanted to reduce the number of applicants re-submitting documents for approved extensions of voucher (if in HCV Program) and/or reasonable accommodations. SAHA has revised its policy to extend the length of time that applicant-provided documents would be valid for verification purposes. Applicant-provided documents dated within 90 calendar days from the eligibility appointment would be valid. This does not apply to permanent documents such as social security cards, birth certificates, and identification cards.

Both methods will apply to the low income public housing and housing choice voucher programs, unless explicitly exempted.

On June 13, 2019, the 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.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



15. FY2020-1: College & University Homeless Assistance Programs

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan and implemented in the same fiscal year.

ii. Description/Update

Update: This activity is in early implementation and initial recipients are expected to be leased by the end of FY2020.

Description: The activity supports the creation of a homeless set-aside program(s) in partnership with local college(s) and university(ies) to address the local housing needs of homeless college and/or university students.

The Agency is tackling this local housing need with a tenant-based set-aside voucher. Because these set-asides will have time limits, alternative eligibility requirements, and are married to homeless college/university pilot program(s), they are being proposed separate from the Agency's set-asides allocated under FY2011-9.

This activity allows the Agency to initially set-aside up to 20 tenant-based housing choice vouchers for households referred by Palo Alto College (PAC) and 30 tenant-based housing choice vouchers for St. Philip's College. The Agency may set-aside additional vouchers to support additional college(s) and/or university(ies) who enter into a partnership with the Agency.

Students seeking housing vouchers through the Homeless Assistance Program(s) must meet criteria outlined by the partner agency. Partner Programs may have slightly different college/university program eligibility requirements. Eligibility for SAHA housing will remain consistent across all programs. Students must adhere to both sets of requirements.

Students receiving housing assistance through this set-aside must meet SAHA eligibility criteria for income levels, background check and lawful residency. Students will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), MTW alternative payment standard schedules (see FY2019-1: Local Small Area Fair Market Rent Implementation), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)). Students have up to one semester after graduation to secure housing at which point students are no longer eligible for the housing voucher.

In addition, this proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;
- is unmarried;
- does not have a dependent child;



- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

1. a local educational agency 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 Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

iii. Planned Non-Significant Changes

The Agency is currently working with a local community college to implement an additional College Homeless Assistance Program at additional campuses. The program will be consistent with the framework originally set out in this activity operating within the current waivers approved in FY2020.

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



B. Not Yet Implemented Activities

1. FY2020-2: St. Phillips College Homeless Program (SPC-HP)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to increase housing choices, by providing homeless college students stable housing. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: This activity is not implemented. The Agency is working on new development planning and will continue this work in FY2021.

Description: The activity supports the creation of a homeless set-aside program in partnership with a local community college to address the local housing needs of homeless college students.

This proposed activity would allow the Agency to attach the new program to modified project-based units at a new SAHA development. The units at the new development will be limited to homeless college students referred by St. Phillips College (SPC).

The SPC program has the following elements:

- (1) Housing: SAHA will provide rental assistance or housing for up to 30 SPC students and dependents who are homeless or near homeless². The rental assistance would be limited to three years.
- (2) Education: Students must (1) remain enrolled in 12 or more academic credits and otherwise make adequate academic progress toward a degree (SPC will track the adequacy of the student's progress); (2) maintain GPA above 2.5 to maintain housing assistance; (3) complete 64-80 of community services hours per semester; and (4) participate in support services provided by SPC.
- (3) On-Campus Support: SPC will administer the homeless college student program to include managing a program waitlist, providing SAHA the referral, assisting the student through the leasing process, tracking academic progress, and providing supportive services during the students' tenure in the college program.

This proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA 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;

² Students and their families must meet HUD's definition of homeless (which encompasses the US Department of Education's definition of homeless). In addition, student eligibility rules as outlined in 24 CFR part 5, subpart F would remain applicable.



- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

- 1) a local educational agency 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 Agency does not require standard HCV leases, the Agency does ensure leases include language per HUD regulations. The Agency [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

Local Need Identified: The Alamo College District is a community college system with campuses located throughout the San Antonio area. Populations of homeless students have been identified, some sleeping in their cars in college parking lots at several campuses. Over 300 homeless and/or youth aging out of foster care students are currently enrolled at ACD, which is approximately 2.3% of students enrolled. St. Phillips College (SPC) is a community college located in the San Antonio neighboring several of SAHA existing housing communities as well as SAHA undeveloped land parcels. It is also located within the federally designated Eastside Promise Zone (EPZ).

St. Philip's College was founded in 1898 in San Antonio by the Episcopal Diocese of West Texas. The College has evolved from its humble beginnings as an industrial school into a fully accredited two-year institution of higher education serving a diverse student population. The College has expanded to include two campuses -- Martin Luther King Campus (MLK) and Southwest Campus



(SWC). It is the only institution of higher learning in the nation officially designated as a Historically Black College and Hispanic serving institution.

Becoming Part of a Local Solution: SAHA is currently working on a robust housing expansion plan (see Appendix 5.2) and would like to leverage those plans to help address a local housing need that has been identified by its partners. There are several SAHA-owned undeveloped land parcels near the St. Phillips College that could support a new development with dedicated modified PBVs.

Through the Agency's current modified PBV activity (FY2015-3) the Agency plans to commit up to thirty (30) project-based vouchers as part of future development. The proposed activity below outlines the homeless college student program that will be supported by the modified PBVs.

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

The Agency is currently working with the partner to implement a College Homeless Assistance Program using the framework set out in FY2020-1. This activity is planned to be closed out in the FY2020 report and the new program is anticipated to begin implementation in FY2021 under FY2020-1.



2. FY2020-3: Family Self Sufficiency (FSS) Program Streamlining

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures, by creating administrative efficiencies in the Family Self-Sufficiency Program. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: Implementation of this activity has been delayed. The Agency is currently reviewing recent changes to HUD regulations to determine whether the waiver is still needed to achieve the original intent. The Agency may close the activity in the FY2020 MTW Report as a result of this review.

Description: The overall goal of this activity is to create operational efficiencies that will maximize engagement in the FSS program. The Agency is requesting the following:

1. **Modify FSS Contract:** The Agency is proposing to modify the FSS contract to align it policy in its Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. Currently in the Agency's HCV program, a participant's TTP is calculated per the approved MTW activity, FY2014-6 Rent Simplification. This FSS-related waiver would allow the Agency's FSS contracting process to be consistent with current and future PH and HCV alternative rent policies.
2. **Eliminate 120 day rule:** the Agency is requesting to enroll new FSS households in accordance with policy in its Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. According to PIH 93-24, the Agency must conduct a reexamination or interim determination if more than 120 days will occur between the effective date of the FSS contract of participation and the effective date of the last reexamination or interim redetermination. Any household wanting to enroll in FSS could do so without being required to request an interim recertification or wait until the next annual recertification. This modification will provide a shorter wait time from the pre-selection interview to the enrollment into the program. FSS participants will continue to follow the Agency's family obligations to report any changes in income as established in Admin Plan and ACOP.

This activity will increase cost effectiveness by creating administrative efficiencies in the Family Self-Sufficiency Program. By allowing households to enroll in the FSS program outside the 120 day period, operations staff and FSS program staff will be able to reduce administrative tasks. Operations staff

1. will continue to process interims for FSS enrollment if the household's income has changed since the last interim/annual recertification.
2. FSS staff will no longer have to manually calculate the standard FSS contract during the FSS contracting process.

iii. Planned Non-Significant Changes

None



iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None



3. FY2020-4: Time-Limited Workforce Housing Pilot Program (PBV)

i. Plan Year Approved, Implemented, Amended

This activity is designed to achieve the MTW statutory objective to promote self-sufficiency by providing on-site supportive services that promote self-sufficiency. The activity was approved in the FY2019-2020 MTW Plan.

ii. Description/Update

Update: The Agency anticipates to begin implementation in FY2020/21. St. John's Square has been identified as the property. This new development is currently in the pre-development phase and seeking low income tax credits. Once the development closes, the Agency will begin implementation of the pilot to include hiring the Resident Services Coordinator, executing agreements with the partners, and further program development.

Description: This pilot is supported by the Agency's current modified PBV activity (FY2015-3) through a commitment of fifty (50) project-based vouchers at St. John's Square.

The pilot project (max 50 households) for working residents provides time-limited housing assistance at selected sites where MTW modified PBVs have been committed. Working households at 50% of the area median income and who do not exceed 80% of the area median income, who choose to apply would receive five (5) years of housing assistance, with a two year extension if needed based on hardship.

SAHA will partner with SA Works to help provide a pipeline of both employers in the area and individuals to fill the units. SAHA would work directly with SA Works and the participating employers to not only ensure the units are filled, but also to create a career path for program participants. A separate waitlist would be created for those individuals who qualify for the program.

SAHA will work with the following partners to implement this initiative: local workforce partners (Project Quest, Goodwill Industries, Workforce Solutions Alamo), local employers (such as hospitals, restaurants, hotels), and a local developer. The partners will execute an MOU that outlines the roles and responsibilities for each party.

SAHA will also hire a Resident Services Coordinator to work with and mentor program participants to improve retention and success rates for the program. This position will be funded through the operations of the development at a cost of \$60,000 a year to include benefits.

Hardship policies: SAHA can extend the term of the assistance up to two (2) years if the family provides a written request for an extension and SAHA finds that good cause exists for the extension.

Program Qualifications:

Participants would be responsible to pay their portion of rent as calculated FY2014-6: HCV Rent Reform and would be required to meet with the SAHA Resident Services Coordinator, to assist with career opportunities and advancement. Participants would also be required to be employed by one of the employers participating with SAHA's partner for this program, SA Works. The program would also require participants to commit to career paths provided by their employers in their respective fields in order to further increase their salaries.



Potential clients will be referred to by either the partner employers or workforce partners to the Resident Services Coordinator who will then determine eligibility. The Resident Services Coordinator will work with property management to ensure annual eligibility and to determine any hardship cases. Property management will also be responsible for compliance adherence and reporting.

All potential residents must attend SAHA's Early Engagement Program or demonstrate that they have attended the following SAHA approved classes: Financial Literacy, Housekeeping or How to be a good tenant, Conflict Resolution, and Tenant's Rights and Obligations. Potential resident must demonstrate that they have been employed a minimum of 90 days with the existing employer.

Partner employers must demonstrate that the potential resident is on a career path, such as their management programs, to detail how the resident will advance and achieve self-sufficiency within the five (5) year limit of housing assistance. SAHA, the respective workforce partners, the employer, and the resident will execute a contract that details the resident goals that could include the following:

1. **Financial/Asset Building:** Opening and maintaining Checking and Savings Accounts; Household has saved at least 3 months of monthly expenses, Improving Credit Scores to qualify for market rate housing and/or homeownership; secure reliable transportation
2. **Employment/Retention/Advancement:** Maintains employment with the existing employer through the duration of the contract or with another employer within the existing industry; advances within the set career path plan set forth by employer
3. **Income:** Increase income throughout the contract period and achieve 80% AMI at or before the end of the 5 year limit
4. **Education/Training:** Secure High School Diploma or GED; secure post secondary degree(s); complete industry recognized certifications; if needed, complete English As a Second Language Program

All participating residents must maintain good standing and meet with the Resident Services Coordinator on a monthly basis to report the progress of the goals.

Participants will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)).

iii. Planned Non-Significant Changes

None

iv. Planned Changes to Metrics/Data Collection

None

v. Planned Significant Changes

None

C. Activities On Hold

None



D. Closed Out Activities

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.

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.

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.

FY2011-1c Holistic Case Management

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.

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.

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.

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.

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 new activity FY2014-1.



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 new activity FY2014-1.

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.

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.

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.

FY2012-10 **Biennial Reexamination for Elderly/Disabled Participants on Fixed Income (HCV)**

This activity was originally approved as part of the FY2011-2012 MTW Plan and implemented in that fiscal year. The activity has been closed out because it was replaced by FY2014-4.

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 was closed out before implementation due to discussions with HUD about RAD option.

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.

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. This pilot activity is proposed to be closed out as of FY2017 and upon approval of this plan. Staff analysis of the pilot identified process improvements that will be implemented in a new MTW Activity proposed for FY2017. Pilot households will be transitioned into the new MTW Activity or the standard public housing program.



FY2013-3 **Standardize Section 8 and Public Housing Inspection Progress**

This activity was designed to unify Section 8 and Public Housing inspection standards. The intent was to raise lower standards to a higher, uniform level. It was anticipated that UPCS (Public Housing) would serve as a model for most elements, but some were to be derived from HQS (Section 8). This activity has been on hold until now, pending results of HUD tests at other PHAs. HUD has completed the study and is now conducting a demonstration. SAHA 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.

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.

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 FY2019-20 Alternative Recertification Process.

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.



Section V. Sources and Uses of Funds

A. Estimated Sources and Uses of MTW Funds

i. Estimated Sources of 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	\$9,216,480
70600	HUD PHA Operating Grants	\$138,561,623
70610	Capital Grants	\$4,820,923
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$443,282
71600	Gain or Loss on Sale of Capital Assets	\$5,072,323
71200+71300+71310+71400+71500	Other Income	\$2,066,951
70000	Total Revenue	\$160,181,582

ii. Estimated Uses of 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
91000 (91100+91200+91400+91500+91600+ 91700+91800+91900)	Total Operating - Administrative	\$15,931,045
91300+91310+92000	Management Fee Expense	\$8,178,479
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,207,653
93000 (93100+93600+93200+93300+9340 0+93800)	Total Utilities	\$5,094,990
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$17,221,884
95000 (95100+95200+95300+95500)	Total Protective Services	\$217,540
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,899,208
96000 (96200+96210+96300+96400+9650 0+96600+96800)	Total Other General Expenses	\$2,807,193
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$556,277



97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$103,978,140
97400	Depreciation Expense	\$9,388,720
97500+97600+97700+97800	All Other Expense	\$0
9000	Total Expenses	\$166,481,129

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

Total expenses are greater than sources -- FDS line item 97400, Depreciation is a non-cash expense which do not require a cash outlay.

Per Board Resolution 6032 dated June 4, 2020, SAHA Moving-to-Work (MTW) funds are obligated consistent with the MTW Plan for the following:

- 1) Section 8 funding shortfall - \$2.2 million
- 2) Public Housing funding shortfall - \$4.5 million
- 3) Program administration and implementation of MTW initiatives - \$1.4 million
- 4) Capital Planning - \$500 thousand
- 5) Additional Funding for East MEadows Public Improvements and Relocation - \$200 thousand
- 6) Expansion of Public Housing Wi-Fi - \$2 million
- 7) Highland Park property support - \$1 million
- 8) Preservation and expansion of affordable and public housing - \$15.1 million

iii. Description of Planned Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of planned activities that use only the MTW single fund flexibility. 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 single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY
<p>The Community Development Initiative Department (CDI) uses staff resources and MTW funds to provide services designed to promote and support outreach and service coordination, resident engagement, and self sufficiency. CDI's services focus on basic needs, education, employment and resident leadership in an effort to support resident's path to self sufficiency.</p> <p>A. Basic Needs</p> <p><u>Food Assistance</u></p> <p>SAHA's partnerships with the San Antonio Food Bank, the City of San Antonio, and other non-profits, provide residents access to regular food assistance including the following:</p> <ol style="list-style-type: none"> 1) Monthly commodities for residents 60 and over 2) Congregated lunches for residents 60 and over 3) Quarterly food distributions for participants of Public Housing and Section 8 4) Pop up food distributions for participants of Public Housing and Section 8



Health and Wellness

Partnerships with non profit agencies provide residents the opportunity to receive health education and exercise classes.

Resident Engagement

SAHA sponsors a variety of events to promote health and wellness, including:

- Golden Gala: annual event for up to 1,000 elderly and disabled residents that includes the H2A (Healthy Habits Active) Living Awards which highlights resident involvement and engagement in civic engagement, health, and other quality of life activities
- Annual Father's Day Celebration: engages up to 500 families in positive family activities and recognize fathers' contributions through "El Hombre Noble" awards
- Annual Mother's Day Celebration: engages up to 400
- National Night Out: site base events designed to build community and link residents to services in the community.

B. Education

Education Investment Foundation

SAHA's education-related programming is significant and diverse, and includes:

- 1) REACH Awards: recognize and reward nearly 300 students annually for academic achievement
- 2) College Scholarship Program: funds scholarships for up to 50 students annually to provide much needed support to ensure higher educational achievement
- 3) Education Summit: provides up to 900 residents annually with access to education and college resources, financial literacy, and other self-help resources

ConnectHome

SAHA has made it a priority to develop and implement digital inclusion strategies that address the digital divide. In 2015, SAHA kicked off ConnectHome, a program created by HUD.

ConnectHome's goal is to bridge the digital divide by providing Public Housing and Section 8 families with tools to Access, Participate, and Benefit from the Digital Economy. To achieve this ConnectHome provides Public Housing and Section 8 families three components of digital inclusion: (1) internet service, (2) computer devices; and (3) digital skills training.

- Internet Access: Through free hotspots, Wi-fi expansion, and subscription to affordable services
- Computer Ownership: increase access to affordable/free new and refurbished computers through electronics donation program
- Digital Skills Training: Teach individuals the skills they need to use computers and the Internet in order to participate in the digital economy. and going beyond the basic digital skills training, ConnectHome have created tracks to further provide opportunities to support: Workforce Development, Education, STEM and Quality of Life.

As of May 2020, SAHA has provided literacy training to 2,686 participants, 1,323 devices to participants, and connected 914 households to the internet.



Additionally, the ConnectHome program goes one step further by implementing strategies that help residents use their new digital tools and skills to improve their education, health, quality of life and employment outcomes. This comprehensive service delivery approach is based on a collaborative model designed in partnership with other community organizations and partners that pursue shared digital inclusion goals.

C. Employment

Training Programs

SAHA's partnerships with Alamo Colleges, Project Quest, and other educational partners provides residents the opportunity to enroll in free or low cost certificate programs.

Summer Youth Program

The Summer Youth Employment Program employs up to 80 resident youth each year, providing work experience and capacity development such as resume writing, banking/financial literacy, interview skills, conflict resolution and other life and workforce development soft skills.

Resident Ambassador Empowerment Program

The Resident Ambassador Program employs 10 residents throughout the year, providing meaningful work experience for residents. SAHA has found that this program is an effective strategy to engage all residents in educational, training, workforce development, and other self-sufficiency programs. Eight additional residents are employed as Digital Ambassadors who focus on supporting outreach and service delivery for the ConnectHome program.

D. Resident Leadership

SAHA provides residents guidance and training in support of forming and maintaining Resident Councils. A Resident Council Training Manual and Quarterly Training provide residents with guidance on the following:

- A. Nominations and Elections
- B. Executive Council Responsibilities
- C. Meetings
- D. Budgets
- E. Requesting Tenant Participation Funds / Dollars Per Unit Per Year (DPUY)
- F. Community Engagement.

B. 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 provide 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**

C. Rental Demonstration (RAD) Participations

i. Description of RAD Participation

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
--

Given recent HUD guidance, the Agency is exploring the feasibility of participating in RAD.

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

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment? **N/A**



Section VI. Administrative

(VI) ADMINISTRATIVE	
<u>ANNUAL MTW PLAN</u>	
<p>A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE</p> <p>The MTW PHA shall provide a resolution signed by the Board of Commissioners (or other authorized MTW PHA governing body) adopting the Annual MTW Plan and the Annual MTW Plan Certifications of Compliance (as it appears in this Form 50900). A signed version of the Annual MTW Plan Certifications of Compliance must also be included.</p>	<p>See Appendix B</p>
<p>B. DOCUMENTATION OF PUBLIC PROCESS</p> <p>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).</p>	<p>See Appendix B</p>
<p>C. PLANNED AND ONGOING EVALUATIONS</p> <p>The MTW PHA shall provide a description of any planned or ongoing MTW PHA-directed evaluations of the MTW demonstration and/or of any specific MTW activities (or state that there are none).</p>	<p>FY2015-1: MDRC / HUD Rent Study is ongoing and SAHA continues to work closely with MDRC. The Agency is currently working with MDRC to execute an amendment to the current memorandum of understanding to allow MDRC to collect data on the study participants through the end of the 6-year follow-up period. The Agency intends to continue participation through FY2021-2022.</p>
<p>D. LOBBYING DISCLOSURES</p> <p>The MTW PHA shall provide signed copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).</p>	<p>See Appendix B</p>



APPENDIX B: RESOLUTIONS AND CERTIFICATIONS

Appendix B is reserved for the Agency’s resolutions, certifications, and other documentation requirements as required by HUD Form 50900: Elements of Annual MTW Plan.

The following will be provided upon submission to HUD.

- Board Resolution and Certifications of Compliance
- Public posting materials
- Operations and Choice Neighborhood Committee materials
- Public comment documentation
- Lobbying Disclosures
 - (SF-LLL)
 - (HUD-50071)



**San Antonio Housing Authority
Resolution 6018**

RESOLUTION 6018, AUTHORIZING THE PROPOSED 2020-2021 MOVING TO WORK (MTW) AGENCY PLAN, INCLUDING REVISIONS TO THE MTW PLAN, THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP), THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN), THE CAPITAL FUND PROGRAM PLAN (CFP), AND THE FIVE-YEAR CAPITAL IMPROVEMENT AND DEVELOPMENT PLAN

WHEREAS, the Board of Commissioners of the San Antonio Housing Authority, a public instrumentality created pursuant to the laws of the State of Texas (SAHA), must approve the 2020-2021 Moving to Work (MTW) Agency Plan for fiscal year 2020-2021, including the revised MTW Plan, Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan) and the Capital Fund Program Plan (CFP); and


WHEREAS, the Board of Commissioners of the San Antonio Housing Authority also desires to authorize the submission of the 2020-2021 MTW Agency Plan to the U.S. Department of Housing and Urban Development (HUD); and

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


NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of SAHA hereby:

- 1) Approves Resolution 6018, authorizing the proposed 2020-2021 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Plan (ACOP), the Housing Choice Voucher Administrative Plan (ADMIN PLAN), the Capital Fund Program Plan (CFP), and five-year Capital Improvement and Development Plan; and
- 2) Authorizes the Board Chair and President and CEO to execute and submit such certifications and other documents as necessary for the submission of the 2020-2021 MTW Plan to HUD.

Approved the 7th day of May 2020.

DocuSigned by:

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Ana M. "Cha" Guzman
Chair, Board of Commissioners

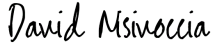
Attested and approved as to form:

DocuSigned by:

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David Nisivoccia
President and CEO

SAN ANTONIO HOUSING AUTHORITY

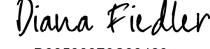
June 4, 2020

BOARD OF COMMISSIONERS**RESOLUTION 6032, APPROVING THE CONSOLIDATED OPERATING BUDGET FOR SAN ANTONIO HOUSING AUTHORITY AND ITS AFFILIATED NONPROFIT ENTITIES FOR THE FISCAL YEAR ENDING JUNE 30, 2021**

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David Nisivoccia
 President and CEO

DocuSigned by:

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Ed Hinojosa
 Chief Financial Officer

DocuSigned by:

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Diana Kollodziej Fiedler
 Director of Finance and
 Accounting

REQUESTED ACTION:

Consideration and approval regarding Resolution 6032, approving the Consolidated Operating Budget for the San Antonio Housing Authority and its affiliated Nonprofit entities for the fiscal year ending June 30, 2021.

FINANCIAL IMPACT:

The proposed budget will be implemented for the Fiscal Year starting July 1, 2020, and ending June 30, 2021. Financial performance versus budget will be reported back to the Finance Committee on a periodic basis throughout the year.

SUMMARY:

The budget is to help the agency plan operational activities, while considering established goals with respect to the current and future funding environment. The budget has been developed in support of the San Antonio Housing Authority's following strategic goals:

- 1) Empower and equip families to improve their quality of life and achieve economic stability.
- 2) Invest in our greatest resource – our employees – and establish a track record for integrity, accountability, collaboration and strong customer service.
- 3) Preserve and improve existing affordable housing resources and opportunities.
- 4) Strategically expand the supply of affordable housing.
- 5) Transform core operations to be a high performing and financially strong organization.
- 6) Develop a local and national reputation for being an effective leader, partner, and advocate for affordable housing and its residents.

All departmental and operational budgets were prepared in accordance with the following directives:

- All SAHA budgets are based on Agency priorities and established strategic goals.
- Section 8 HAP is budgeted at 99.4% funding proration with our MTW Target Utilization of 12,240 vouchers adjusted for known allocations of Tenant Relocation or Special Programs.
- For Section 8 Administration, we budgeted average funding at 79% proration. The budget for Section 8 Administration includes continued efforts towards efficiency improvement and cost reduction.
- Public Housing property budgets reflect subsidy funding of 92.5% proration, accordingly, all cost budgets are consistent with this projected funding level. Target occupancy is 97%;

SAN ANTONIO HOUSING AUTHORITY**June 4, 2020**

however, due to the effects of COVID-19, this figure could be impacted. Also, due to the effects of COVID-19, an average 18% reduction in tenant rent is projected for the fiscal year.

- Target occupancy ranges from 93%-97% for the Beacon properties; however, due to the effects of COVID-19, a 5% reduction in rents is projected for the first six months of the fiscal year.
- Development Services budgets are consistent with the 5-year development plan.
- Central Office Cost Center (COCC) and Service Departments will experience continued pressure on funding and fees. The COCC funding restrictions are partially supported by efficiency improvements and other cost reduction efforts.

Staff has been working on the Fiscal Year 2020-2021 budget process, since October 2019. While staff continues to monitor the federal funding news, budgets were prepared using conservative estimates based on available information. Staff is pleased to present an overall balanced budget for the 2020-2021 fiscal year.

Managers worked diligently to produce operating budgets for their areas of responsibility. Officers and Directors have met with the Executive team to present their budgets and have made all appropriate adjustments.

Staff has focused on making prudent departmental and budgetary decisions, especially during this very challenging and changing funding environment, which has now been further exacerbated by the effects of COVID-19. The agency will also continue identifying and implementing solutions that will build on existing strengths and deliver services effectively and efficiently, while being innovative, ethical and nimble.

Following review by the Finance Committee, the budget will be presented to the full Board of Commissioners for consideration and approval at the June 4, 2020, meeting.

STRATEGIC GOAL:

Transform core operations to be a high performing and financially strong organization.

ATTACHMENTS:

Resolution 6032
HUD form 52574
Budget Presentation

**San Antonio Housing Authority
Resolution 6032**

RESOLUTION 6032, APPROVING THE CONSOLIDATED OPERATING BUDGET FOR THE SAN ANTONIO HOUSING AUTHORITY AND ITS AFFILIATED NONPROFIT ENTITIES FOR THE FISCAL YEAR ENDING JUNE 30, 2021

WHEREAS, the fiscal year of the San Antonio Housing Authority and its affiliated Nonprofit entities runs from July 1 through June 30; and

WHEREAS, the Commissioners of the San Antonio Housing Authority are responsible for the adoption of its operating budget under its Rules of Governance; and

WHEREAS, the U.S. Department of Housing and Urban Development requires the San Antonio Housing Authority to adopt a public housing budget for its approval; and

WHEREAS, the San Antonio Housing Authority has prepared a Consolidated Operating Budget that maintains the long-term financial health of the agency and the ability to provide quality housing and services; and

WHEREAS, SAHA Moving to Work (MTW) funds are obligated consistent with the MTW Plan for the following:

- 1) Section 8 funding shortfall - \$2.2 million
- 2) Public Housing funding shortfall - \$4.5 million
- 3) Program administration and implementation of MTW initiatives - \$1.4 million
- 4) Capital Planning - \$500 thousand
- 5) Additional Funding for East Meadows Public Improvements and Relocation - \$200 thousand
- 6) Expansion of Public Housing Wi-Fi - \$2 million
- 7) Highland Park property support - \$1 million
- 8) Preservation and expansion of affordable and public housing - \$15.1 million

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of SAHA hereby:

- 1) Reviewed the Consolidated Budget and has found that the final plan is reasonable in that it indicates a source of funding adequate to cover proposed expenditures; and
- 2) Approves Resolution 6032, approving the Consolidated Operating Budget for the San Antonio Housing Authority and its affiliated Nonprofit entities for the Fiscal Year Ending June 30, 2021, and the obligation of funds as described in this Resolution and included in the referenced Consolidated Operating Budget; and

- 3) Authorizes the Board Chair and President and CEO to submit and sign the HUD forms related to this Operating Budget.

Passed and approved the 4th day of June 2020.

DocuSigned by:

Ana M. Guzman

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Ana M. "Cha" Guzman

Chair, Board of Commissioners

Attested and approved as to form:

DocuSigned by:

David Nisivocchia

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David Nisivocchia

President and CEO

PHA Board Resolution
Approving Operating Budget

**U.S. Department of Housing
and Urban Development**
Office of Public and Indian Housing -
Real Estate Assessment Center (PIH-REAC)

OMB No. 2577-0026
(exp. 07/31/2019)

Public reporting burden for this collection of information is estimated to average **10 minutes per response**, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

This information is required by Section 6(c)(4) of the U.S. Housing Act of 1937. The information is the operating budget for the low-income public housing program and provides a summary of the proposed/budgeted receipts and expenditures, approval of budgeted receipts and expenditures, and justification of certain specified amounts. HUD reviews the information to determine if the operating plan adopted by the public housing agency (PHA) and the amounts are reasonable, and that the PHA is in compliance with procedures prescribed by HUD. Responses are required to obtain benefits. This information does not lend itself to confidentiality.

PHA Name: San Antonio Housing Authority PHA Code: TX006

PHA Fiscal Year Beginning: 07/01/2020 Board Resolution Number: 6032

Acting on behalf of the Board of Commissioners of the above-named PHA as its Chairperson, I make the following certifications and agreement to the Department of Housing and Urban Development (HUD) regarding the Board's approval of (check one or more as applicable):

DATE

- Operating Budget approved by Board resolution on: 06/04/2020
- Operating Budget submitted to HUD, if applicable, on:
- Operating Budget revision approved by Board resolution on:
- Operating Budget revision submitted to HUD, if applicable, on:

I certify on behalf of the above-named PHA that:

1. All statutory and regulatory requirements have been met;
2. The PHA has sufficient operating reserves to meet the working capital needs of its developments;
3. Proposed budget expenditure are necessary in the efficient and economical operation of the housing for the purpose of serving low-income residents;
4. The budget indicates a source of funds adequate to cover all proposed expenditures;
5. The PHA will comply with the wage rate requirement under 24 CFR 968.110(c) and (f); and
6. The PHA will comply with the requirements for access to records and audits under 24 CFR 968.110(i).

I hereby certify that all the information stated within, as well as any information provided in the accompaniment herewith, if applicable, 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 and 3802)

Print Board Chairperson's Name:	Signature	Date:
Ana M. "Cha" Guzman		06/04/2020

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 Chairman 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 (07/01/2020), 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, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and 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 135.
- (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 and implementing regulations at 49 CFR Part 24.

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) 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.
- (22) 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.

San Antonio Housing Authority

TX006

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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).

David Nisivoccia

President and CEO

NAME OF AUTHORIZED OFFICIAL

TITLE

DocuSigned by:

3/11/2020


SIGNATURE

DATE

*** Must be signed by either the Chairman 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 Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**



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HOUSING AUTHORITY
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San Antonio Housing Authority
818 S. Flores St. • P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477- 6262
www.saha.org

Public Notice dated February 21, 2020, of a 30-day Comment Period & Public Hearing Regarding the Proposed 2020-2025 Strategic Plan (Proposed 2020-2021 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, and Capital Fund Program Plan)

Take notice that a 30-day public comment period

will begin on Friday, February 21, 2020, and end on Thursday, April 2, 2020, on the San Antonio Housing Authority's Proposed 2020-2025 Strategic Plan (Proposed 2020-2021 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, and Capital Fund Program Plan).

Comments on changes may be delivered by electronic mail to mtw@saha.org. Comments may also be physically delivered to the attention of the Policy and Planning Department at the Central Office of the San Antonio Housing Authority, 818 S. Flores Street, 78204. All comments are due by 5:00 pm on April 2, 2020.

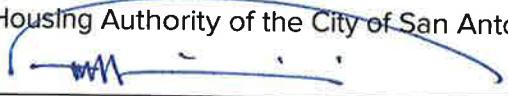
Take notice that a public hearing

will be held in the Community Room of the Kenwood North Apartments, 121 Avenue M St., San Antonio, TX, 78212, commencing at 2:00 p.m. on March 19, 2020, to consider and act upon items shown on the attached agenda.

Documents are available for viewing online at www.saha.org, as well as in person at the Central Office of the San Antonio Housing Authority, 818 S. Flores Street, San Antonio, TX, 78204.

DATED: February 21, 2020

Housing Authority of the City of San Antonio, Texas


David Nisivoccia
President and CEO

Attachment

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Meeting site is accessible to handicapped persons. Accessible parking is located at
121 Avenue M St., San Antonio, TX, 78212.



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BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair	Jessica Weaver Vice Chair	Charles Clack Commissioner	Jo-Anne Kaplan Commissioner	Olga Kauffman Commissioner	Sofia A. Lopez Commissioner	Ruth Rodriguez Commissioner
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PRESIDENT & CEO

David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
PUBLIC HEARING**

**121 Avenue M St., San Antonio, TX 78212
2:00 p.m., Thursday, March 19, 2020**

The Board of Commissioners will convene for a Public Hearing in the Community Center located at 121 Avenue M St. San Antonio, TX, 78212, for discussion on the following matters:

PROPOSED 2020-2025 STRATEGIC PLAN and PROPOSED 2020-2021 MOVING TO WORK AGENCY PLAN

1. Introduction and background (Richard Milk, Director of Policy and Planning)
2. Proposed 2020-2025 Strategic Plan (Richard Milk, Director of Policy and Planning)
3. Proposed 2020-2021 Moving to Work Agency Plan (Richard Milk, Director of Policy and Planning)
 - Moving to Work Plan
 - Public Housing Admissions and Continued Occupancy Plan
 - Housing Choice Voucher Administrative Plan
 - Capital Fund Program Plan
4. Public Comments/Feedback
5. Summary and Next Steps (Richard Milk, Director of Policy and Planning)

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

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



SAHA SAN ANTONIO
HOUSING AUTHORITY
Opportunity Lives Here

San Antonio Housing Authority
818 S. Flores St. • P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477- 6262
www.saha.org

Public Notice dated February 25, 2020, of a 30-day Comment Period & Public Hearing Regarding the Proposed 2020-2025 Strategic Plan (Proposed 2020-2021 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, and Capital Fund Program Plan)

Take notice that a 30-day public comment period

will begin on Tuesday, February 25, 2020, and end on Thursday, April 2, 2020, on the San Antonio Housing Authority's Proposed 2020-2025 Strategic Plan (Proposed 2020-2021 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, and Capital Fund Program Plan).

Comments on changes may be delivered by electronic mail to mtw@saha.org. Comments may also be physically delivered to the attention of the Policy and Planning Department at the Central Office of the San Antonio Housing Authority, 818 S. Flores Street, 78204. All comments are due by 5:00 pm on April 2, 2020.

Take notice that a public hearing

will be held in the Community Room of the Mission Park Apartments, 5825 Analissa St., San Antonio, TX, 78214, commencing at 2:00 p.m. on March 19, 2020, to consider and act upon items shown on the attached agenda.

Documents are available for viewing online at www.saha.org, as well as in person at the Central Office of the San Antonio Housing Authority, 818 S. Flores Street, San Antonio, TX, 78204.

DATED: February 25, 2020

Housing Authority of the City of San Antonio, Texas

David Nisivoccia
President and CEO

Attachment

RECEIVED
CITY OF SAN ANTONIO
CITY CLERK
2020 FEB 25 PM 2:04

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Meeting site is accessible to handicapped persons. Accessible parking is located at 5825 Analissa St., San Antonio, TX, 78214.



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HOUSING AUTHORITY
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BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Jessica Weaver Charles Clack Jo-Anne Kaplan Olga Kauffman Sofia A. Lopez Ruth Rodriguez
Chair Vice Chair Commissioner Commissioner Commissioner Commissioner Commissioner

PRESIDENT & CEO

David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
PUBLIC HEARING**

**5825 Analissa St., San Antonio, TX 78214
2:00 p.m., Thursday, March 19, 2020**

The Board of Commissioners will convene for a Public Hearing in the Community Center located at 5825 Analissa St. San Antonio, TX, 78214, for discussion on the following matters:

PROPOSED 2020-2025 STRATEGIC PLAN and PROPOSED 2020-2021 MOVING TO WORK AGENCY PLAN

1. Introduction and background (Richard Milk, Director of Policy and Planning)
2. Proposed 2020-2025 Strategic Plan (Richard Milk, Director of Policy and Planning)
3. Proposed 2020-2021 Moving to Work Agency Plan (Richard Milk, Director of Policy and Planning)
 - Moving to Work Plan
 - Public Housing Admissions and Continued Occupancy Plan
 - Housing Choice Voucher Administrative Plan
 - Capital Fund Program Plan
4. Public Comments/Feedback
5. Summary and Next Steps (Richard Milk, Director of Policy and Planning)

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CITY OF SAN ANTONIO
CITY CLERK
2020 FEB 25 PM 2:04

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

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



RECEIVED
CITY OF SAN ANTONIO
CITY CLERK

2020 APR 10 AM 8:44

San Antonio Housing Authority
818 S. Flores St. • P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477-6262
www.saha.org

Public Notice of a Resident Services
Committee Meeting or Special Board Meeting - Teleconference

Take notice that a public meeting of the

Board of Commissioners of the Housing Authority of the City of San Antonio, Texas, will be held by accessing **Phone Number: (413) 752-2467** and entering **PIN Number: 599743125#**, prior to 1:00 p.m. The meeting will commence at 1:00 p.m. on April 16, 2020, to consider and act upon items shown on the attached agenda.

DATED: April 9, 2020

Housing Authority of the City of San Antonio, Texas

DocuSigned by:

A handwritten signature in black ink, appearing to read "David Nisivoccia", is written over a horizontal line.

5608927B75274DC

David Nisivoccia
President and CEO

Attachment

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Notice, this Board meeting will be conducted via teleconference. There will be no public meeting site accessible.

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



BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair Jessica Weaver Vice Chair Charles Clack Commissioner Jo-Anne Kaplan Commissioner Olga Kauffman Commissioner Sofia A. Lopez Commissioner Ruth Rodriguez Commissioner

PRESIDENT & CEO
David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
OPERATIONS AND CHOICE NEIGHBORHOOD COMMITTEE or
**SPECIAL BOARD MEETING
TELECONFERENCE**

Call In Phone Number: (413) 752-2467

PIN Number: 599743125#

2:00 p.m., Thursday, April 16, 2020

RECEIVED
CITY OF SAN ANTONIO
CITY CLERK
2020 APR 10 AM 8:45

The Board of Commissioners will convene for a Committee, or Special Board meeting, by teleconference, for discussion on the following matters:

MEETING CALLED TO ORDER

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

PUBLIC COMMENT

2. Public Comment - Citizens are provided three minutes each to speak to any agenda items. Citizens requesting to speak to the agenda, should access Phone Number: **(413) 752-2467** and enter PIN Number: **599743125#**, prior to 2:00 p.m.

OPERATIONS

3. Hold a Public Hearing and consideration and appropriate action regarding Resolution 6018, authorizing the proposed 2020-2021 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), and the five-year Capital Improvement and Development Plan (Richard Milk, Director of Policy and Planning)
4. Consideration and appropriate action regarding Resolution 6019, authorizing the award of a contract for development initiative consulting services to Baker Tilly Virchow Krause, LLP, through Philadelphia Housing Authority, for an annual cumulative amount not to exceed \$150,000.00; for a period of eleven months with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services; Lorraine Robles, Director of Development Services and Neighborhood Revitalization)
5. Consideration and appropriate action regarding Resolution 6020, authorizing the award of a contract for information technology professional services and IaaS (Infrastructure as a Service) to Denovo Ventures, LLC, through U.S. General Services Administration (GSA) Federal Supply Schedule, for an amount not to exceed \$265,000.00; for the period of April 3, 2020, to October 16, 2021 (Steven

Morando, Director of Procurement and General Services; Jo Ana Alvarado, Director of Innovative Technology)

6. Consideration and appropriate action regarding Resolution 6022, authorizing the award of a contract for Pecan Hill Tree Removal and Sanitary Sewer Replacement to All Pro General Construction, Inc. (DBE, ESBE, HABE, MBE, SBE, HUB, Section 3 Business) for an amount not to exceed \$1,291,739.00 (Steven Morando, Director of Procurement and General Services; Hector Martinez, Director of Construction Services and Sustainability; Kristi Baird, Director of Beacon Communities)
7. Consideration and appropriate action regarding Resolution 6026, authorizing the award of contracts for painting services for Beacon Communities to A&S Landscaping Services (ESBE, HABE, MBE, SBE, VBE, Section 3 Business) and Garcia Brothers Make Ready & Repairs (HABE, Section 3 Business) for an annual cumulative amount not to exceed \$200,000.00 for year one, \$220,000.00 for year two, \$245,000.00 for year three, \$265,000.00 for year four, and \$290,000.00 for year five; for a period of one year with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services; Kristi Baird, Director of Beacon Communities)
8. Consideration and appropriate action regarding Resolution 6025, authorizing the award of a contract to EPIC Business Essentials through Omnia Partners Cooperative Purchasing Program for office supplies, related products and services for an annual cumulative amount not to exceed \$240,000.00; for a period of one year with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services)

INDIVIDUAL ITEMS FOR CONSIDERATION

9. Update and discussion regarding the Procurement Activity Report
10. Discussion regarding development strategies and opportunities
11. Adjournment

RECEIVED
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CITY CLERK
2020 APR 10 AM 8:45

*Note: Whenever the Texas Open Meetings Act (Section 551.001 et seq. of the Texas Government Code) provides for a closed meeting in matters concerning legal advice, real estate, contracts, personnel matters, or security issues, the Board may find a closed meeting to be necessary. For convenience of the citizens interested in an item preceded by an asterisk, notice is given that a closed meeting is contemplated. However, the Board reserves the right to go into a closed meeting on any other item, whether it has an asterisk, when the Board determines there is a need and a closed meeting is permitted.

**Note: If a quorum of the Board of Commissioners attends the Committee Meeting, this meeting becomes a Special Meeting of the Board, but no Board action will be taken other than recommendations to the full Board, unless the full Board is present.



BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair Jessica Weaver Vice Chair Charles Clack Commissioner Jo-Anne Kaplan Commissioner Olga Kauffman Commissioner Sofia A. Lopez Commissioner Ruth Rodriguez Commissioner

PRESIDENT & CEO
David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
RESIDENT SERVICES COMMITTEE or
SPECIAL BOARD MEETING TELECONFERENCE
Call In Phone Number: (413) 752-2467
PIN Number: 599743125#
1:00 p.m., Thursday, April 16, 2020

RECEIVED
CITY OF SAN ANTONIO
CITY CLERK
2020 APR 10 AM 8:45

The Board of Commissioners will convene for a Committee, or Special Board meeting, by teleconference, for discussion on the following matters:

MEETING CALLED TO ORDER

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

PUBLIC COMMENT

2. Public Comment - Citizens are provided three minutes each to speak to any agenda items. Citizens requesting to speak to the agenda, should access Phone Number: **(413) 752-2467** and enter PIN Number: **599743125#**, prior to 1:00 p.m.
3. Public Comment - Residents are provided three minutes each to speak on items regarding their tenancy. Citizens requesting to speak regarding their tenancy, should access Phone Number: **(413) 752-2467** and enter PIN Number: **599743125#**, prior to 1:00 p.m.

UPDATES AND DISCUSSIONS

4. Update and discussion regarding SAHA Road to Digital Inclusion, for Public Housing and Beacon Communities (Brandee Perez, Chief Operating Officer; Kristi Baird, Director of Beacon Communities; Jo Ana Alvarado, Director of Innovative Technology)
5. Update and discussion regarding changes in policies and procedures related to residents (Brandee Perez, Chief Operating Officer)
6. Adjournment

*Note: Whenever the Texas Open Meetings Act (Section 551.001 et seq. of the Texas Government Code) provides for a closed meeting in matters concerning legal advice, real estate, contracts, personnel matters, or security issues, the Board may find a closed meeting to be necessary. For convenience of the citizens interested in an item preceded by an asterisk, notice is given that a closed meeting is contemplated. However, the Board reserves the right to go into a closed meeting on any other item, whether it has an asterisk, when the Board determines there is a need and a closed meeting is permitted.

**Note: If a quorum of the Board of Commissioners attends the Committee Meeting, this meeting becomes a Special Meeting of the Board, but no Board action will be taken other than recommendations to the full Board, unless the full Board is present.



RECEIVED
CITY OF SAN ANTONIO
CITY CLERK

2020 APR 10 AM 8:54

San Antonio Housing Authority
818 S. Flores St. • P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477- 6262
www.saha.org

Public Notice of a Teleconference Public Hearing
Regarding the SAHA Proposed 2020-2025 Strategic Plan

Take notice that a 30-day public comment period

began on Tuesday, February 25, 2020, and will be extended until Thursday, April 30, 2020, on the San Antonio Housing Authority's Proposed 2020-2025 Strategic Plan (Proposed 2020-2021 Moving to Work Agency Plan, including MTW Plan, Public Housing Admissions and Continued Occupancy Plan, Housing Choice Voucher Administrative Plan, and Capital Fund Program Plan).

Comments on changes may be delivered by electronic mail to mtw@saha.org. All comments are due by 5:00 pm on April 30, 2020.

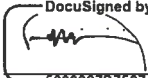
Take notice that a TELECONFERENCE public hearing

will be held by accessing Phone Number: **(413) 752-2467** and entering PIN Number: **599743125#**, prior to 2:00 p.m, commencing on April 16, 2020, to consider and act upon items shown on the attached agenda.

Documents are available for viewing online at www.saha.org.

DATED: April 9, 2020

Housing Authority of the City of San Antonio, Texas

DocuSigned by:

5609927B75274DC
David Nisivoccia
President and CEO

Attachment

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Notice, this Board meeting will be conducted via teleconference. There will be no public meeting site accessible.



RECEIVED
CITY OF SAN ANTONIO
CITY CLERK

2020 APR 10 AM 8:54

San Antonio Housing Authority
818 S. Flores St. - P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477-6262
www.saha.org

**Public Notice of an Operations and Choice Neighborhood Committee
or Special Board Meeting**

Take notice that a public meeting of the

Board of Commissioners of the Housing Authority of the City of San Antonio, Texas, will be held by accessing **Phone Number: (413) 752-2467** and entering **PIN Number: 599743125#**, prior to 2:00 p.m. The meeting will commence at 2:00 p.m. on April 16, 2020, to consider and act upon items shown on the attached agenda.

DATED: April 9, 2020

Housing Authority of the City of San Antonio, Texas

DocuSigned by:

5009927875274DC...

David Nisivoccia
President and CEO

Attachment

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Notice, this Board meeting will be conducted via teleconference. There will be no public meeting site accessible.



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CITY OF SAN ANTONIO
CITY CLERK

2020 APR 10 AM 8:44

BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair	Jessica Weaver Vice Chair	Charles Clack Commissioner	Jo-Anne Kaplan Commissioner	Olga Kauffman Commissioner	Sofia A. Lopez Commissioner	Ruth Rodriguez Commissioner
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PRESIDENT & CEO
David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
PUBLIC HEARING
TELECONFERENCE**

Call In Phone Number: (413) 752-2467

PIN Number: 599743125#

2:00 p.m., Thursday, April 16, 2020

The Board of Commissioners will convene for a Public Hearing by teleconference, for discussion on the following matters:

PROPOSED 2020-2025 STRATEGIC PLAN and PROPOSED 2020-2021 MOVING TO WORK AGENCY PLAN

1. Introduction and background (Richard Milk, Director of Policy and Planning)
2. Proposed 2020-2025 Strategic Plan (Richard Milk, Director of Policy and Planning)
3. Proposed 2020-2021 Moving to Work Agency Plan (Richard Milk, Director of Policy and Planning)
 - Moving to Work Plan
 - Public Housing Admissions and Continued Occupancy Plan
 - Housing Choice Voucher Administrative Plan
 - Capital Fund Program Plan
4. Public Comments/Feedback
5. Summary and Next Steps (Richard Milk, Director of Policy and Planning)



RECEIVED
CITY OF SAN ANTONIO
CITY CLERK

2020 APR 30 PM 2:16

San Antonio Housing Authority
818 S. Flores St. - P.O. Box 1300
San Antonio, TX 78295-1300
Phone (210) 477-6262
www.saha.org

Public Notice of a Regular Board Meeting - Teleconference

Take notice that a public meeting of the

Board of Commissioners will be held by accessing Phone Number: **(661) 527-0038** and entering PIN Number: **542838110#**, prior to 1:00 p.m. The meeting will commence at 1:00 p.m. on May 7, 2020, to consider and act upon items shown on the attached agenda.

DATED: April 30, 2020

Housing Authority of the City of San Antonio, Texas

DocuSigned by:

David Nisivoccia

5609927B75274DC

David Nisivoccia
President and CEO

Attachment

SAN ANTONIO HOUSING AUTHORITY ACCESSIBILITY STATEMENT

Notice, this Board meeting will be conducted via teleconference. There will be no public meeting site accessible.

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



BOARD OF COMMISSIONERS

Dr. Ana "Cha" Guzmán Chair	Jessica Weaver Vice Chair	Charles Clack Commissioner	Jo-Anne Kaplan Commissioner	Olga Kauffman Commissioner	Sofia A. Lopez Commissioner	Ruth Rodriguez Commissioner
-------------------------------	------------------------------	-------------------------------	--------------------------------	-------------------------------	--------------------------------	--------------------------------

PRESIDENT & CEO

David Nisivoccia

**SAN ANTONIO HOUSING AUTHORITY
*REGULAR BOARD MEETING
TELECONFERENCE**

Call In Phone Number: (661) 527-0038

PIN Number: 542838110#

1:00 p.m., Thursday, May 7, 2020

RECEIVED
CITY OF SAN ANTONIO
CITY CLERK
2020 APR 30 PM 2:24

MEETING CALLED TO ORDER

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

PUBLIC COMMENT

3. Public Comment - Citizens are provided three minutes each to speak to any agenda items. Citizens wishing to speak to items posted on the agenda should access Phone Number: **(661) 527-0038** and enter PIN Number: **542838110#**, prior to 1:00 p.m.
4. **Citizens to be Heard at approximately 1:00 p.m.** (may be heard after this time) Citizens wishing to speak on issues not related to items posted on the agenda should access Phone Number: **(661) 527-0038** and enter PIN Number: **542838110#**, for call in prior to 1:00 p.m. Citizens will be given three minutes to speak. Each citizen will be permitted to speak only once at any regular Board Meeting. A Spanish/English translator will be available to citizens needing translation.

MINUTES

5. Minutes
 - Approval of the March 5, 2020, Regular Board Meeting minutes
 - Approval of the April 2, 2020, Regular Board Meeting minutes
 - Approval of the April 16, 2020, Special Board Meeting minutes (Resident Services Committee)
 - Approval of the April 16, 2020, Special Board Meeting minutes (Operations and Choice Neighborhood Committee)

COMMITTEE MEETING UPDATE

6. Update and discussion regarding the April 16, 2020, Resident Services Committee Meeting (Charles Clack, Chair, Resident Services Committee)
7. Update and discussion regarding the April 16, 2020, Operations and Choice Neighborhood Committee Meeting (Jessica Weaver, Vice Chair, Board of Commissioners)

CONSENT ITEMS

8. Consideration and approval regarding Resolution 6018, authorizing the proposed 2020-2021 Moving to Work (MTW) Agency Plan, including revisions to the MTW Plan, the Public Housing Admissions and Continued Occupancy Policy (ACOP), the Housing Choice Voucher Administrative Plan (Admin Plan), the Capital Fund Program Plan (CFP), and the five-year Capital Improvement and Development Plan (Richard Milk, Director of Policy and Planning)
9. Consideration and approval regarding Resolution 6019, authorizing the award of a contract for development initiative consulting services to Baker Tilly Virchow Krause, LLP, through Philadelphia Housing Authority, for an annual cumulative amount not to exceed \$150,000.00; for a period of eleven months with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services; Lorraine Robles, Director of Development Services and Neighborhood Revitalization)
10. Consideration and approval regarding Resolution 6020, authorizing the award of a contract for information technology professional services and IaaS (Infrastructure as a Service) to Denovo Ventures, LLC, through U.S. General Services Administration (GSA) Federal Supply Schedule, for an amount not to exceed \$265,000.00; for the period of April 3, 2020, to October 16, 2021 (Steven Morando, Director of Procurement and General Services; Jo Ana Alvarado, Director of Innovative Technology)
11. Consideration and approval regarding Resolution 6022, authorizing the award of a contract for Pecan Hill Tree Removal and Sanitary Sewer Replacement to All Pro General Construction, Inc. (DBE, ESBE, HABE, MBE, SBE, HUB, SECTION 3 BUSINESS) for an amount not to exceed \$1,291,739.00 (Steven Morando, Director of Procurement and General Services; Hector Martinez, Director of Construction Services and Sustainability; Kristi Baird, Director of Beacon Communities)
12. Consideration and approval regarding Resolution 6026, authorizing the award of contracts for painting services for Beacon Communities to A&S Landscaping Services (ESBE, HABE, MBE, SBE, VBE, Section 3 Business) and Garcia Brothers Make Ready & Repairs (HABE, Section 3 Business) for an annual cumulative amount not to exceed \$200,000.00 for year one, \$220,000.00 for year two, \$245,000.00 for year three, \$265,000.00 for year four, and \$290,000.00 for year five; for a period of one year with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services; Kristi Baird, Director of Beacon Communities)
13. Consideration and approval regarding Resolution 6025, authorizing the award of a contract to EPIC Business Essentials through Omnia Partners Cooperative Purchasing Program for office supplies, related products and services for an annual cumulative amount not to exceed \$240,000.00; for a period of one year with the option to renew up to four additional one-year terms (Steven Morando, Director of Procurement and General Services)

INDIVIDUAL ITEMS FOR CONSIDERATION

14. Discussion regarding Board operations
15. Discussion regarding resident services and programs
16. Discussion regarding development strategies and opportunities
17. President's Report
 - COVID-19 Update

18. Closed Session:

Real Estate/Consultation with Attorney

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

- Cooperation agreement between the Housing Authority of the City of San Antonio, Texas and the Texas Housing Foundation

19. Adjournment

*Note: Whenever the Texas Open Meetings Act (Section 551.001 et seq. of the Texas Government Code) provides for a closed meeting in matters concerning legal advice, real estate, contracts, personnel matters, or security issues, the Board may find a closed meeting to be necessary. For convenience of the citizens interested in an item preceded by an asterisk, notice is given that a closed meeting is contemplated. However, the Board reserves the right to go into a closed meeting on any other item, whether it has an asterisk, when the Board determines there is a need and a closed meeting is permitted.

Public Comment Documentation

The 2021 MTW Plan was posted for public comment on February 21, 2020. The draft Plan was posted on SAHA's website, and two hard copies were printed out and placed in the two main lobbies of the Central Offices. The public comment period was originally scheduled to close on April 2, but was extended until April 30, 2020 due to the COVID-19 pandemic.

A variety of opportunities were provided for public comment, including via email to mtw@saha.org, by mail to 818 S. Flores, at a public hearing, and, for the first time, by responding to a survey.

Meeting/Sessions and attendance

- Meetings for housing choice voucher participants, public housing residents, and landlords were originally scheduled to be held on March 23, 24, and 26 2020:
 - Monday, March 23, 9am-11am, Central Office Boardroom (Landlords only)
 - Monday, March 23, 2pm-4pm, Central Office Boardroom (Tenants/Residents only)
 - Tuesday, March 24, 2pm-4pm, Villa Tranchese Community Room, 307 Marshall St. (Elderly/Disabled residents)
 - Thursday, March 26, 2pm-4pm, Westway Community Room, 5627 Culebra Rd. (Family residents)
- All of these meetings were cancelled due to the COVID-19 pandemic.

Survey

- In lieu of the cancelled meetings, a survey was developed and administered to capture public comments on proposed changes to MTW Plan, 2025 Strategic Plan, ACOP, and Admin Plan.
- The survey was titled "SAHA 2025: What do you think?" and sent out from April 9 - May 2, 2020. Each topic included Likert scale questions as well as free response questions.
- 893 responses were received
- Documents are included below provide a summary and analysis of survey results, a presentation of survey results, and staff responses.

Board and Committee Meetings

- April 16, 2020 Public Hearing (during the Operations and Choice Neighborhood Committee meeting): Originally scheduled to take place on March 19, and rescheduled due to COVID-19 pandemic. No attendees signed up to make public comments.
- May 7, 2020 Regular Board of Commissioners meeting, originally scheduled to take place on April 2, and rescheduled due to COVID-19 pandemic. No attendees spoke to the items.



SAHA 2025: What do you think?

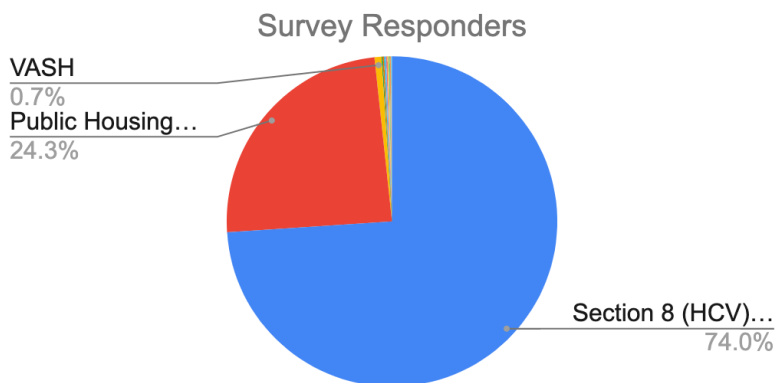
Summary and analysis of survey responses

Survey Overview

A survey titled “SAHA 2025: What do you think?” was prepared and sent out from April 9 - May 2, 2020. Each topic included questions with Likert scale responses and free response comments. This report summarizes the quantitative responses with an average value and charts showing the distribution of values. The free responses are categorized and presented by topic and sub-topic.

Delivery and response statistics

1. Sent 8974
 - a. Bounces 691
 - b. Successful Deliveries 8283
 - c. Opens 4721
2. Survey responders 893
 - a. English 884
 - b. Spanish 9
 - c. HCV 74.0%
 - d. PH 24.3%
 - e. VASH 0.7%
 - f. Other 1.0%
3. Individual free-response comments 426



Survey Topics

- Strategic Plan: Key 2025 Outcomes
- MTW Plan: Community feedback on MTW Activities



- ACOP and Administrative Plan Changes

Likert Scale

All responses are on a scale of 1 to 5, where 1 is Very Dissatisfied or Strongly Oppose, and 5 is Very Satisfied or Strongly Support. In this report, colors are assigned to each response value in the following way:



Strategic Plan

Survey Text:

SAHA proposes the following six agency priorities through 2025:

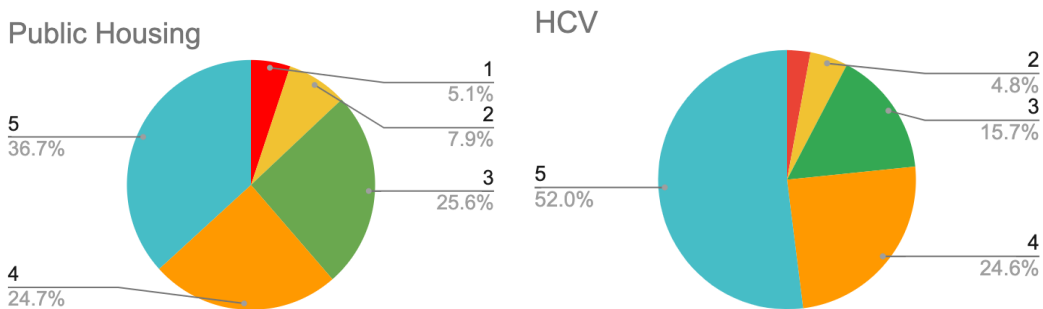
1. A supply of affordable quality units exist in sufficient quantities for SAHA Clients
2. SAHA Clients live in quality affordable housing
3. SAHA Clients have access to sufficient / affordable utilities
4. SAHA Clients feel safe
5. SAHA Staff respect and value diversity and inclusion
6. SAHA staff thrive in career and professional work

Average response: 4.08



1	32
2	50
3	162
4	217
5	429

Breakout by responder's program:



Summary of Comments

Satisfied with outcomes:

1. That six point goal would be very nice if it could really be met.
2. Sounds Good
3. If all of these things are achieved this will be great
4. Great goals
5. The goals are great.
6. 4 & 6 are somewhat of an issue at our community complex..needs improvement.
7. I think it's a wonderful concept, and it will help out alot of people.



8. *Your priorities are strong and show respect for all who are in the housing programs. Everyone will be housed in homes that are safe to live in and safe with appliances within apts. ascertaining they are clean and kept in healthy conditions. Administrator and housing staff respect and help all clients who apply. Thank you for the personnel training you have given them.*
9. *I believe that the goals for our SAHA, is extending, for the better towards me and the rest of the public I am so happy and proud of all of you, that have our backs the overall effect for the betterment I appreciate, the program's that you'll offer the public, my prayers are for each and everyone involved in these goals keep up the good work 🙏.*
10. *These are all doable goals if they are implemented*
11. *Affordable utilities would be amazing!*
12. *"1. In certain areas of the city the units for lease aren't in the best of shape. Landlords should pour some love in their properties and vice versa. Tenants should beautify and not let things go over-looked. Respect one another's partnership.*
13. *2. Indeed, Nice apartments are popping up and all the projects have disappeared, however, Quality over Quantity. Don't push the poor out with exhausting qualifying standards.*
14. *3. Every one should feel safe and comfortable and at peace in their homes.*
15. *4 Everyone should show and exhibit respect. No matter your position today could be the next tomorrow*
16. *5. Moving up in a career is ideal. For some it's not that easy. Showing your employees growth opportunities may have bigger impact on turnover...or not...ijs*

Dissatisfied with outcomes:

1. *Number one of six already exist. SAHA should ask those clients specifically how they feel about their living arrangement.*
2. *The words diverse and inclusion should not be in the same sentence.*
3. *I don't know why you would include items 4 and 5. I have no input on staff and how they thrive, etc.*
4. *I really can't say I'm satisfied on something that hasn't happened*
5. *SAHA Staff respect & value diversity and Inclusion... Yeah right here at SAHA Lewis Chatham Property Management /C. service ,Case workers & Maintenance constantly don't respect & value diversity & Inclusion! Since 2015 I'm a young 45 year old Disabled Tenant & I've been Discriminated, Harassed, Bullied, retaliated, Bias Motives, against me based on "Age, Disability, Sex, National origin, Ethnicity... clear Violation or noncompliance of the Americans with DISABILITY Act, Section 504 of the Rehabilitation Act, Civil Rights Act, etc. Here on Property by Staff, & Resident's, & S. A. Food Bank(Only Serving Senior residents & excluding the young Disabled Tenants!) SAHA/HUD don't mind accepting my Rent money on the 3rd each month but the rest... No Transparency, No Integrity, No Accountability, checks & balances, These Deceptive practices has to stop... Equal Opportunity for all! DISABILITY us not a barrier... Discrimination is!!! All your Property managers, staff & partners should be held at a higher standard & accountable for their actions... No Exceptions!!!*



6. *These are definitely goals because i can speak from experience that 4 out of 6 are not being met and need a whole lot of work to get there.*

Dissatisfied: New recommended outcome

7. *Given all the harassment of tenants by SAHA staff, there should be a goal about improving those relationships. Also, SAHA would benefit from a goal that centers maintaining the human dignity of their tenants*

Other: Questions / more info requested

1. *Would SAHA make current residents move to these units or are they for new residents? Also my concern is the location of the units.*
2. *Not clear on SAHAs impact on utilities (#3), as a participant for many years I am not familiar with this. Also does #1 include funds for the HCV program? If not should that not be addressed?*
3. *What does #5&6 mean?*

Other: New Barrier / challenge

4. *#6 No where in all the year(5) has my mom/myself got good honest/professional willingly help ,especially because she's a senior with disability. I am her voice her daughter.*

Other: New recommended outcome

5. *Please enforce that us residents are being treated with respect. There is a certain energy that we are NOT as respected and looked down upon because we are not as fortunate as the staffs. I've seen views on both ends as a curtain section 8 resident and as a former social work major.*

Other: Recommended action

6. *Quality , I would suggest installing commercial ac/ heating in all saha properties especially morris beldon*

Other: Unclear

7. *#6*



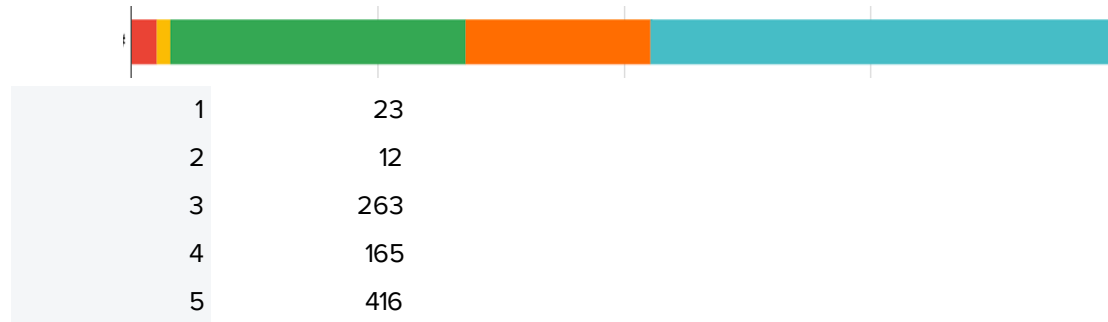
MTW Activities

Next Step (THRU Partnership)

Survey Text:

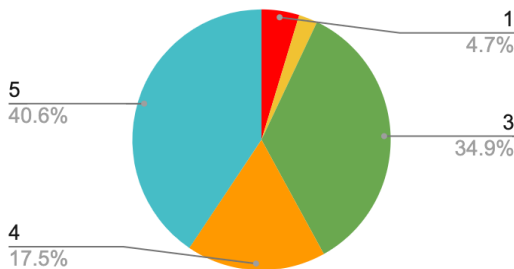
Next Step Housing Program (THRU Project). SAHA seeks to partner with the THRU Project to provide supportive services for foster youth aging out of foster care. SAHA is seeking regulatory changes to support: (1) a rent cap of \$100 for foster youth in the first year and (2) a time-limit of three years with the option of an additional maximum of two year hardship extension.

Average response: 4.07

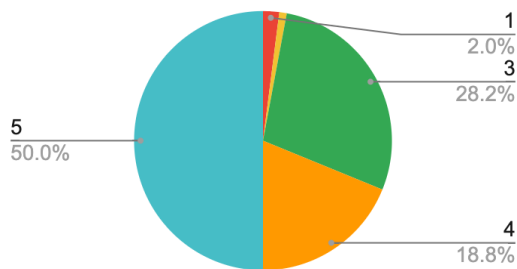


Breakout by responder’s program:

Public Housing



HCV



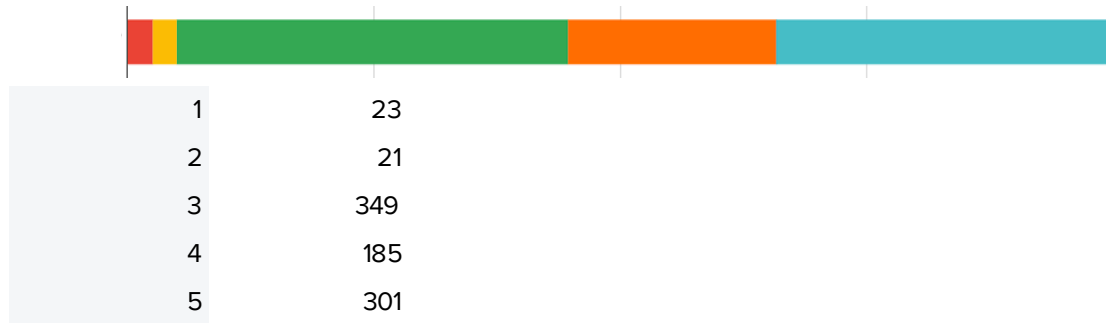
MPBV

Survey Text:

Modified Project Based Vouchers (MPBV): SAHA seeks the ability to determine, on a contract-by-contract basis, whether to use Metropolitan Area Fair Market Rents (MAFMR) or Small Area Fair Market Rents (SAFMR) for Modified Project Based Vouchers (MPBV) at specific properties. MAFMR reflects average rents across the entire metropolitan area, while SAFMR reflects local market (neighborhood) rent averages.

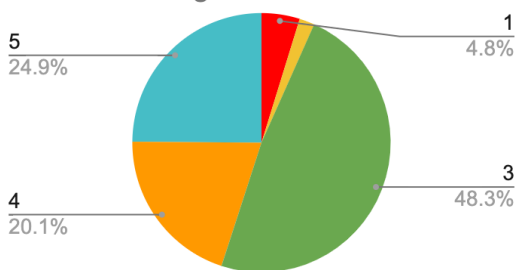
Average response: 3.82



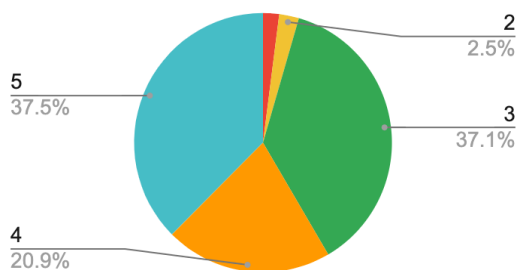


Breakout by responder's program:

Public Housing



HCV



Summary of Comments (one question asked for all MTW Activities)

Support new activity: 10

1. Kids in the foster programs should continue n allows services with good behavior
2. The foster idea is great it should include incentives for youth going to college or enrolled in a program to receive a certificate or degree
3. The 1st one is a good idea upon helping foster children get on their after foster (my understanding) and the 2nd one I quit don't understand.
4. Housing is a necessity for everyone. Foster children would never have to worry about having shelter with this program
5. Hooray 🎉,,,It's so wonderful to hear of the up coming on our foster youth's,,many will make great use and be very appreciative,of the system works out well,,go!!Saha
6. I aged out of foster care at 18 with nowhere to go so i strongly love this
7. I dont understand if The 100.00 is for rent in someone's house or their own apartment. Either way that's good.
8. For the THRU project, will there be financial counseling, a mentor for guidance. Will there be guidance on school and getting into the workforce and being able to sustain a home while living on their own. As for the MBPV I think you should use the small are fair market rents for this project because not all one area have the same average income. Within the areas there are many small areas that make way below the average income or no income at all.
9. I'm looking forward to all new changes



10. *Pienso que estos nuevos programas podrían favorecer a una parte de esa comunidad, que necesita ser apoyada para recibir asesoría para una vida mejor y basado en eso es mi respuesta.*

Oppose / critique of new activity: 5

Next Step (THRU Partnership)

1. *As far as the Foster Kids aging out, it is a wonderful program but \$100? With how much apartment cost to rent, they can only end up in a bad area. That is setting them up for failure.*
2. *The cap of 100 seems low in youth foster care.*
3. *I would support the rent cap if the youth is provided some form of job training, support, or case management for at least the first 6 months to ensure they are able to manage the responsibilities of independence because with the increasing rent prices \$100 would not be much help and the youth could end up homeless. I had an experience with a foster youth and although his situation was not typical, he did get support from the state and still ended up without a home temporarily even though he was able to find a job. But because of immaturity he was still reliant on others for additional support and this service would not have benefitted him at all. Again I believe that unfortunately because they were in the foster system when they age out because they have the option to not take advantage of all the assistance offered if they are not prepared to support themselves the \$100 will not be enough and a waste.*
4. *On the first question regarding foster children, I strongly oppose any child mixed with seniors.... I believe that they should have other family living quarters away from the elderly.*

Modified PBV

5. *My mother shouldn't be subjected to your Modified Projects she's too old to worry about your success after living through the Embarrassment of the system failures.*

Not enough information / not presented well: 12

1. *Not sure what the MTW activities are?*
2. *I do not have sufficient information about those programs to make an informed decision*
3. *I'm unsure about the questions*
4. *Since these aren't written in common sense language I oppose them.*
5. *Not to sure what all means maybe you could go into more details in a simple English way where we as seniors can understand it better.*
6. *Not sure I understand the question sorry.*
7. *I'm sorry I thought the survey was not understandable I was unable to give a good answer or survey due to the fact that I'm not aware of all the things that are being offered now or want to be offered for example mtw activities I wish I could have answered it better if I understood more of it*
8. *I'm don't quite understand this question. Simplify it please.*
9. *you co. did not properly explain the last 2 questions regarding foster program or the voucher program enough for me to make an educated decision or opinion.*
10. *Please clarify*
11. *Information explaining what this is should be included with this question in greater detail.*



12. *MAFMR, AFMR, MPBV I would like to see the break down and more details of this proposal.*

Other: 10

1. *I have no comment as I am not sure how these things will affect me.*
2. *Whatever you think is best.*
3. *Don't know.*
4. *Don't know anything about these programs*
5. *Disabled people should have a CAP as well.*
6. *Easier said than done*
7. *Not sure how it benefits me*
8. *I have no answer for this question is because we do not have any Youth in our community Apartments we are a senior citizen disabled thank you God bless.*
9. *I would have to research these subjects before I gave you an intelligent coherent answer.*
10. *No debe unirse en el mismo edificios personas de la 3 edad con los jovenes*



ACOP

GRIEVANCE PROCEDURE

Survey Text:

Changes to this policy will require SAHA and third-party collectors to pause debt collection during the grievance process. The proposed changes would also require that the following charges be paused during a grievance: move-out charges, charges against the security deposit, late fee and non-sufficient fund (NSF) charges, and maintenance charges.

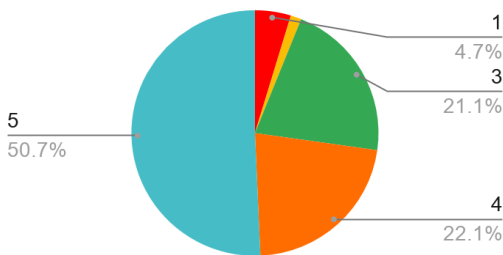
Average response: 4.19



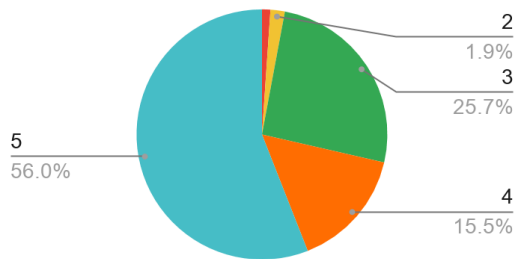
Rating	Count
1	18
2	17
3	219
4	152
5	479

Breakout by responder's program:

Public Housing



HCV



Summary of Comments

Support rule change: [none]

Oppose rule change: [none]

Other: 1

13. ...I see no change to something that you already do

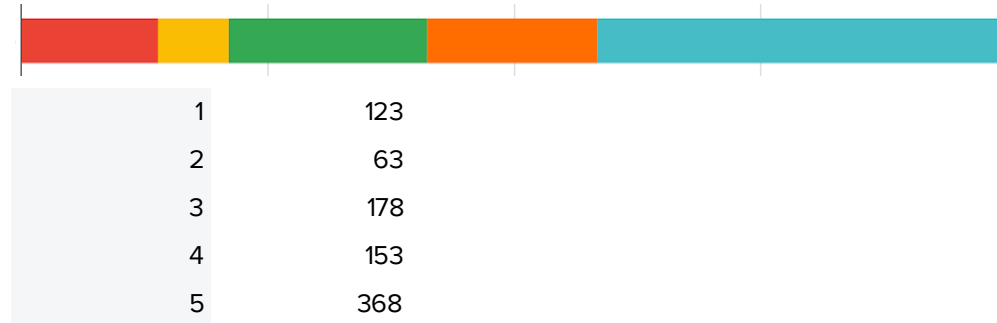


UNIT ACCESS FOR INSPECTIONS

Survey Text:

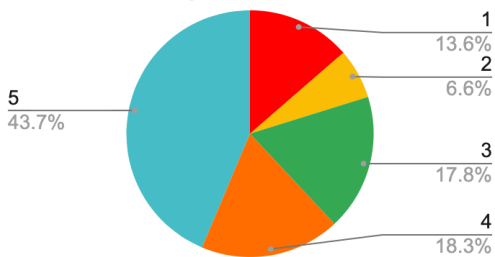
Changes to this policy include the following: If maintenance staff are unable to access the unit at the scheduled inspection time due to actions by the resident, the resident may be charged a fee. If children are in the unit at the time of a non-emergency inspection, at least one adult over the age of 18 must also be present.

Average response: 3.66

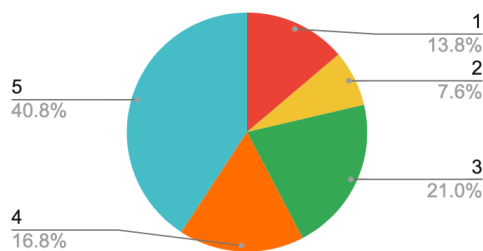


Breakout by responder's program:

Public Housing



HCV



Summary of Comments

Support rule change: [None]

Oppose rule change: 8

1. Don't charge us for having an emergency come up on an inspection and we can't be present we're living in low income place's to start with extra fees will take money out of our pocket
2. Why are inspections not prioritized by whether a tenant is leaving one complex and moving into another by reasons of the lease ending versas someone already living in the unit ? I started emailing my Housing Specialist 3 months prior to my lease ending. The new complex was scheduled 3 days before I had to be out of my apartment. The Inspection department missed 2 scheduled appointments, then scheduled the inspection on the 8th of the next month. I had to move all my furniture into a storage and wait for them to do the inspection. When I notified my Housing Specialist, she would not help. I contacted the inspection



department about my dilemma and they told me it could not be helped. So you see it is not always the tenant in the wrong. I'm also disabled and elderly so I had to pay someone to help me move.

3. Due to the inspections there are times when we are not feeling good and are unable to let them in and I would call the office to reschedule the inspection .
4. I don't feel that a fee should be assessed just because the inspector or maintenance department.
5. I do not think we should be charged. I have been robbed by the maintenance so I must be there.
6. I plan to get off of housing soon. I am not sure what all this means. I don't know why you would charge a resident a fee your inspector people just literally walk in and out. The last time they inspected mine they put a complaint on the ceiling fan blades when there was other issues. Also, residents take a day off of work for a inspector to come for less then five minutes. Also, I know for a fact the inspectors are friends the with the apartment office so they just sign off on orders.
7. I strongly oppose the proposed fee related to inspections. First there is only a date that is given not a time therefore I would not and should not be held liable if for example the maintenance staff and inspector makes an attempt when I am in the shower. I am not going to answer the door. I would understand a fine if an appointment with a more reasonable window of time was scheduled on a 2nd attempt and I failed to make the unit unaccessible for maintenance or the inspector.
8. do not charge for maintenance fees because they do not come on that exact day or at all

Other: 1

14. ...I see no change to something that you already do

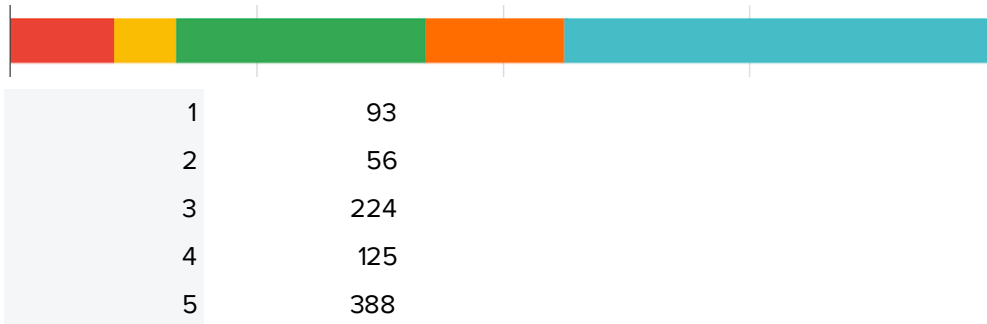


PET RULES AND CHARGES

Survey Text:

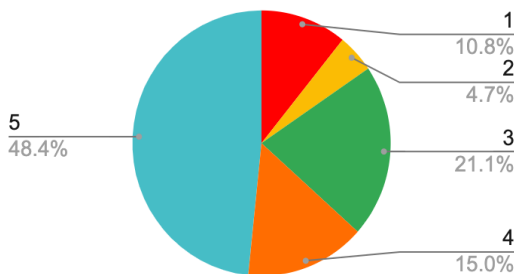
The SAHA Board of Commissioners approved updates to the Public Housing Lease that took effect March 1, 2020. The proposed changes to the ACOP would match those Lease updates, which are the following: Residents would receive a one-time, 24-hour warning before being charged the unauthorized pet fee. The total amount of fees would be capped at \$200 total and can be applied to the pet deposit upon approval by SAHA. Households with multiple unauthorized pets may have an additional charge of \$10 per month NOTE: Service and assistance animals are not considered pets, so fees do not apply.

Average response: 3.74

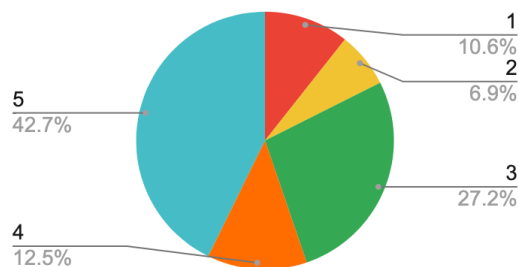


Breakout by responder's program:

Public Housing



HCV



Summary of Comments

Support rule change: 10

1. Definitely agree on all points..also much have documented vaccine records on the animals..have a designated pet area for pooping & peeing..here at my complex these pets go everywhere.
2. The pets rules are a welcome
3. I strongly agree because many of the residents at La Posada del Rey follow the rules on pets and do not have them. Then there are others that do and when these cats and dogs become a bore or nuisance in their homes; they just throw them out. These animals are left to fend for



themselves and become a problem for all others because they have bitten or scratched children , they urinate and defecate all over my porch.

4. *Yes there are a lot of dogs in units around.*
5. *I believe that a higher pet deposit should be enforced unless the pet is a service pet and or not even allowed in apartments. Higher deposit and ONLY ALLOWED IN A HOUSE.*
6. *Yes, the additional pet charges are a necessity.*
7. *All rules applied to everyone who desires a pet with them.*
8. *As for the pet I wholeheartedly agree.*
9. *Service animals should not be charge to tenant*
10. *On my behalf,I'm not a pet owner,,not cuz I don't like them but I'm allergic to them,,I even wish I could have a service dog,,but this subject has great pull, the proposal on this is highly recommended for any tenant and have notifications before hand*

Oppose rule change: 11

1. *Pet deposit should stay at 150\$*
2. *Don't charge for us seniors to have a pet it's out rages we only want company.Do not charge for pets period.*
3. *A pet is not a human being to be paying extra for it's enough taking care for dog is already expensive getting them shots and other things like food us family being in housing can't afford the extra chargers for a pet.*
4. *Not long enough for people to rehome their pets.*
5. *I am not happy with this option. What if like myself my parents have passed away and they had a wonderful little perfectly trained dog and would have gone to the pound if I would not have taken her in. I didn't not want or plan to have a dog but she is the last thing I have of my parents. Now I will be charge this huge amount that I cannot afford.*
6. *I don't support because sometimes pets are like family*
7. *I think some of it is okay but paying rent for pets are not fair deposit yes because they do mess the carpet up and it smell when new renters move in some people have sinus problems, yes so they can make the right choice about keeping the pet, but some get great joy out of having a pet, more so when family do not visit them and they are lonely, sick, the charges are awful.*
8. *as for the pets, the elderly need them for company and warnings they canbe more of a service dog, when they are alone at home everyday.*
9. *There should be NO pet fee or pet 'rent'.*
10. *Do not charge any fee for having 1 pet of any kind*
11. *Cancel ten dollar fee on pets just do 300 or 200 pet deposit which covers damages if done and make sure sec 8 or public housing are treated equally as the regular residents cause these new managers are shady as heck*



Other: Address abuse of existing rules (8)

1. *Where I reside has many residents with two or more large animals, thus, they receive an exemption from the pet policies and this appears abusive of the current pet policies that apply to everyone else since the individuals do not appear to have any disabilities*
2. *Where I live many have big size dogs. Yet many temporary relocate the animals when inspection/pest control noticed come out. So is there really a point in trying to charge unauthorized pet fees??*
3. *Yes and they must enforce the leash Law for the pets. And someone must go to the apartments and make sure the owners secure the animals and not get on top of the other people's cars so that can eliminate the stray animals*
4. *There are many residents who have pit bulls that the office has no clue of.*
5. *Lots of residents have unauthorized Birds/ parrots... Making lots of noise?!!!*
6. *how would mgmt know of unauthorized pets unless random checks are made.*
7. *there are people in my building with pets and it is not authorized & it can be a dangerous situation with all the disabled seniors in the building, but no management has done anything about it.*
8. *Yes, because alot of SAHA apts.that have restricted breed pets on property (pit bulls) especially and other aggressive breed and they are doing it illegally and that is causing a liability and safety issue for the residents which they, their children, other residents could get mailed or lose their life. Can they please, please, please make a change in this. I truly believe that it is not fair but bias and articipants shoul not have an unauthorized pet in apt in the first place or at all and then is given a chance to rectify it after violating the lease agreement in the first place and then SAHA is supposed to give a 24 hour notice and then payments can go towards the pet fee, well SAHA will have lost out on pet fees that should have been collected initially when the unauthorized pet was first brought into the apt to live there and who is to say how long has the pet been there? Please SAHA it is so good to have compassion, but please make rules fair across the board and every single participant comply to the letter or a legal issue could come against agency.*

Other: Too many pets, too much mess (8)

1. *I have no opinion because there's way too many dogs in our apartments and they don't pick up after them and I have the litter trash can for dog mess in my yard area out on my patio so it's unpleasant situation I never thought there would be 40 dogs in this apartment complex or more*
2. *A lot of residents have dogs. They have a few inside the apartment. A lot of them let their dogs roam free and poop all over every one's yards. Gross. They sometimes attack and are aggressive when residents walk by. They dogs are not tied up.*
3. *I have my own opinion about pets. I do not like them. There should be charges applied to pet owners that allow their animals to defecate on or around other tenant apartments and not clean up after them.*
4. *There are so many unauthorized pets where I reside which can become a hazard/danger/issue for residents.*



5. *I am not a pet owner myself the only problem I see with pets that are not service animals are other renters who let their animals leave feces all over the apartment complexes very unsanitary*
6. *Also, can SAHA section 8 voucher holders have a new, very affordable, safe community built with No pets allowed? I suffer anxiety because the apts that we live in are breed restricted and there have been up to 6-12 incidents where there have been pitbulls on property illegally and one if those pitbulls viciously lunged out at me and I suffer anxiety and stress due to this horrible incident. Thank you so very much for your time in really looking into this and your consideration to quickly assist. Thank you very much.*
7. *I just wish people not only that have pets when they take them out to do the bathroom I wish but they would pick up the dogs poop some of them do and some of them don't thank you God bless.*
8. *Payments made to be responsible for their animals droppings they need to clean up after their animals and not just let them free range cuz we have children that wants to play in the grass but is not able to do to all the feces that's everywhere*

Other: Set more stringent rules (size, number, breed, etc.) (6)

1. *LARGE PETS & MORE THAN 2 SHOULD NOT BE ALLOWED! ESPECIALLY PIT BULLS!*
2. *Their people who have pets and dog off leech, let their pets run free their should also be a fee Everytime their dog is unattended*
3. *They need to charge a fee if owners don't pick up after their pet's mess.*
4. *There needs to be a cap of weight and breed of dogs allowed. Also, for those that have a so called "service dog" needs to be really checked. A lot of people are going on line and getting their "not really service dogs" a service license. I know of several in my complex. Also, the staff needs to go in each apartment to check if their are any unauthorised animals. They are so many in my complex that have unauthorised dogs and big dogs*
5. *Animals should not live inside a residential dwelling*
6. *pets are like children, limiting the number is best. Stop trying to make money off pets!!!!*

Other: Exempt service animals from deposit (1)

1. *Service assistant animals should not be charged a deposit at all*



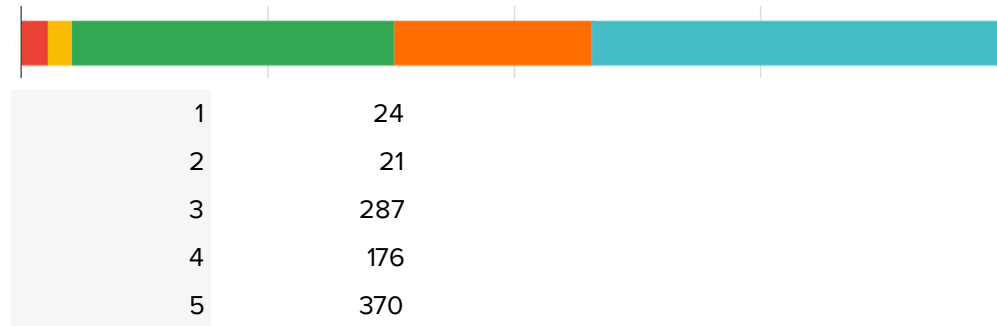
Admin Plan

REASONABLE ACCOMMODATION POLICY AND PROCEDURES

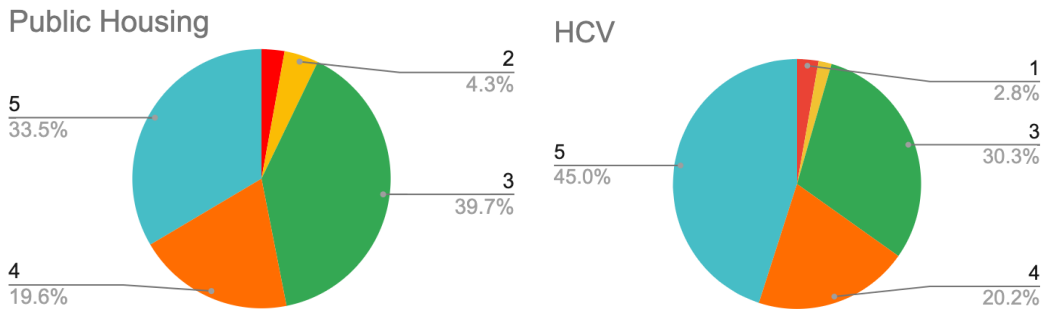
Survey Text:

Changes to this policy will include the statement that landlords and owners must adhere to the Fair Housing Act and the Americans with Disabilities Act (ADA). The change also includes actions that SAHA may take if those laws are violated, including but not limited to denial of a requested tenancy, abatement or suspension of assistance payments, termination of the assistance contract or debarment of the landlord / owner from program participation.

Average response: 3.96



Breakout by responder's program:



Summary of Comments

Support rule change: 1

- I also appreciate that landlords & management can't discriminate against those with disabilities.*



Oppose rule change: [none]

Other: 5

- 1. Your private contractor(s)(landlord) need to have an immediate debarment mechanism in place if the tenant's are not afforded their reasonable accommodations within a reasonable amount of time, especially if the landlord has numerous violations against them*
- 2. If the landlord/owner do not adhere and they have used the funds they were given to fix their complex, besides remove them from getting anymore funds and not be able to participate, they should also be liable for the money they used. Otherwise they can fix their place and then get out of having "Section 8" tenants, which they probably didn't want in the first place.*
- 3. If landlords do not comply with their end of the agreement, as in property up-keep, maintenance, etc, the landlord should not be allowed to rent to clients under SAHA, or Section 8.*
- 4. REASONABLE ACCOMMODATION POLICY AND PROCEDURES: I agree if SAHA is willing to help the tenant. I heard a woman come in to the SAHA office in tears because the landlord said he was raising the rent. The woman at the front window said landlords can not do that. But the woman was still worried. I feel the lady working for SAHA should have not let the woman leave without a document stating her rights and in black in white that the landlord can not do what he is threatening.*
- 5. We need clarification on the reasonable accommodations clause. I am disable and need to move to a first floor apartment but getting all the necessary documents. The made up this rule that I would have to start as a new tenant and go thru all the hoops. I am a resident in good standing for eight years. My question is under hud is the landlord to make up the rule to provide reasonable accommodations. Is this not against the disabilities act.*

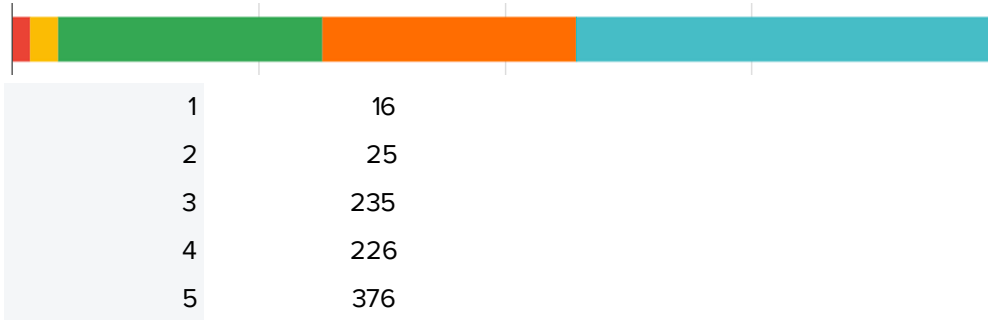


WAITING LIST PREFERENCES

Survey Text:

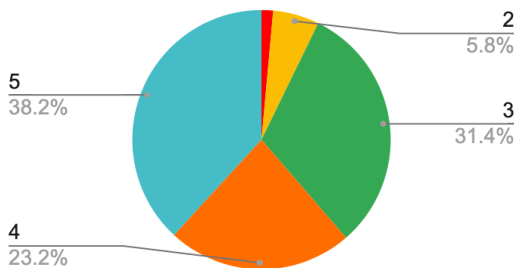
This change will allow all Mainstream Program (one of SAHA's Special Programs) vouchers to be issued to applicants who are referred by partner agencies. This update would also note that the number of vouchers available for this program have increased from 179 to 238.

Average response: 4.05

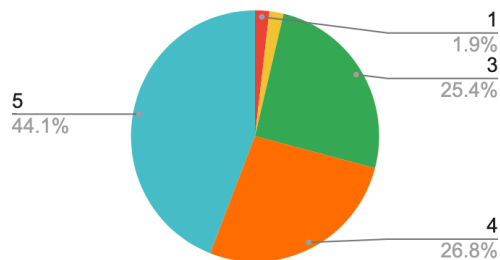


Breakout by responder's program:

Public Housing



HCV



Summary of Comments

Support rule change: [none]

Oppose rule change: [none]

Other: 2

- I am disabled and I also have a son who is under age of 13 and I've been waiting years for section 8 to receive a home for us two but I have only been called to go to apartments and I don't want to be living from apartment to apartment anymore my child needs a stable home and I strongly believe that the waiting list should be handled differently so that people like myself a single mother paying full rent and bills can get help. Sec 8 should become more available then it originally is.*
- yes maybe help find a wheelchair accessible unit that take section 8 voucher and according to age maybe even a 55+ unit that feels like a real home with windows or patio /balcony no carpets central air and heat with a view of other then next building patio/balcony*

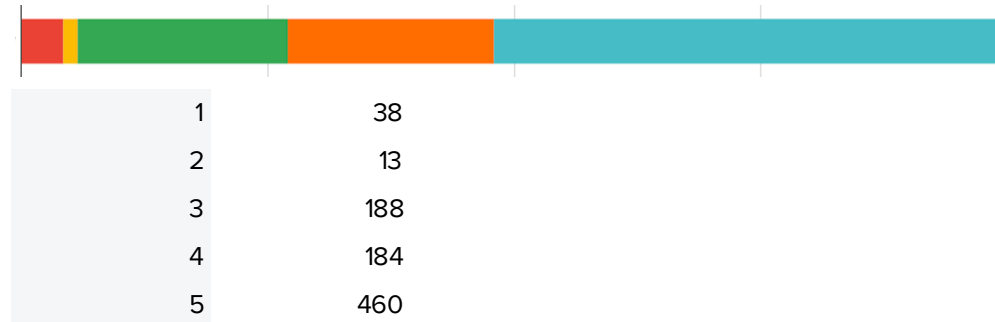


CRIMINAL HISTORY SCREENING

Survey Text:

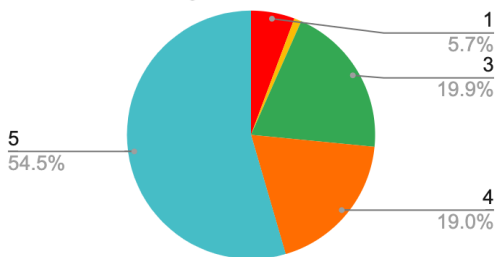
This change states that when SAHA is screening applicants to the voucher programs, SAHA will only look at previous criminal offenses that resulted in conviction, from the date the offense occurred (not the date of conviction). According to the SAHA's criminal history screening criteria, which can be found in the current Administrative Plan, SAHA will look back over different periods of time depending on the severity of the offense.

Average response: 4.15

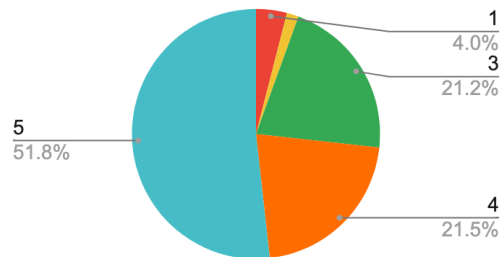


Breakout by responder's program:

Public Housing



HCV



Summary of Comments

Support rule change: 8

- Some people deserve second chances, must take a good look at charges before judging. Our judicial system is broken and at this time in our life's, we can't even count on our peace officers as one is charged for some reason or another just about every week. It comes down to what their accused of doing and if their convicted. Molesters and drug dealers should not be part of such resources if convicted.*
- I agree on checking back grounds*
- I don't understand why a persons past has anything to do with the present. Once you have paid society for the crime that should be the end of it, not follow you forever. Let it be a fresh start.*
- People's pass shouldn't keep them from receiving assistance, people change so something that happened over a decade ago shouldn't stop them from getting assistance*



5. *Maybe , a person was in the wrong place at the wrong time. And ended up getting convicted because of that. Also, people grow up and change. They don't need to be denied if they really need help. They have children their are lots of vairables. They need to be given a chance.*
6. *I think it's a good idea to run a criminal screening & also give a former criminal a chance to find a place to live.*
7. *it is criminal all over some make mistakes, are they to be punish for the rest of there lives, some just did not get caught, the one that did paid for what they did. Our Father forgives, this is the problem Man never forgives, It is not fair to keep a finger over someone head for the res of there lives, some just did not get caught doing stuff, the one that did well they paid for what they did so why keep it over them for the rest of there lives. Our Father do not do that so why do Man that walk on this earth think he have the right to do, Some feel awful for what they did and now are trying to be a better person, OH no some one have a Hand over there head to keep them down if they have shown that they have change why not let them have a place to live*
8. *it is okay something I am surprise was on it about people that been to jail cannot live in Housing, I think that is in human some need a chance to prove themselves change but not giving one a chance no one will ever know. Our Father that sit high, give forgiveness so why is man so perfect that he cannot.*

Oppose rule change: 10

1. *SAHA should give those that have convictions a 2and chance to get Section 8*
2. *Criminal history is important to due. I would feel more safer if this is still implemented!*
3. *SAHA NEEDS to make improvements on these screenings and take ****serious**** action when it comes to criminal offenses and not look at just the recent convictions, but EVERY crime they've ever committed prior to their most recent offense because a LOT of things slide through the cracks resulting in certain occurrences (such as theft, burglary, domestic violence, harassment, etc). The complex in which we live is NOT safe, it never was and it never will be since the main manager of the property decided to let anyone and everyone purchase FOBs/ parking stickers, granting them entrance to the complex. What the point of it being gated if you're just going to mess up the entire purpose of a "gated community". And when I ask about planting cameras for the safest of the residents, he always opposes the idea.*
4. *I am aware that all people in life make mistakes and need the opportunity to start fresh and that sometimes it's hard to do when you're coming out of prison or jail but think that checking past Criminal offenses would be for the safety of everyone*
5. *Criminal History SCREENING IS WELCOME*
6. *your last question about criminal history screening is vague and confusing and SAHA should have a zero tolerance to any crime of any degree or offense. I dont understand why a date of conviction vs. the date of the arrest , etc. or the date of any offense ? A crime is a crime.*
7. *SAHA recipients should have a clean background before being able to use state funding for housing vouchers. Criminals offenses such as drug charges, crimes against children and violent crimes should not be permitted.*
8. *I do agree 100% you should check all backgrounds for every little thing thank you God bless you.*



9. *There is a lot of criminal lives in Saha property it's not good any who applied for Saha need to go under background screenings, please*
10. *"PLEASE MAKE ALL PLACES SAFE & AFFORDABLE FOR EVERYONE NOT JUST SSI!
""WHOSE RENT IS LIKE HALF & GET MANY OTHER PERKS""! ALSO CHECK BACKGROUND
& DRUG TEST & CONTINUE TO IF HAVE HAD PRIORS ON DRUGS! ""TILL CLEAN""! THAT'S
THE PROBLEM!"*

Other: 14

1. *Just bcus a person has a pass eviction shouldn't deny a person to have a place to live*
2. *The criminal screen is what hurts a lot of ppl from getting the help they need*
3. *Is there a point of doing a criminal history when most of the tenants have people living in units that aren't on the lease?? How will Saha check those people??*
4. *Pedophiles and abusers should NOT be allowed into this program.*
5. *I would like to have SAHA withdraw the vouchers from residents who allow felons to stay with them. Extra people living in Section 8/ Voucher apartments should be grounds to ban them from voucher programs*
6. *Too many unauthorized/undocumented residents (some convicts) residing in apartment communities.*
7. *Background checks are not implemented currently. What a joke*
8. *YES NEEDS TO REALLY LOOK AT THIS ESPECIALLY FOR DRUG CHARGES! Drug test & continue to drug test LIKE DR'S DO!*
9. *Strongly support,,any tenant has limitations,,but criminal activity from any human being living in our section eight program's with any length of criminal activity,,also carry barriers*
10. *Sex offenders and pedophiles should not be allowed to rent in SAHA residents/apartments.*
11. *What if the applicant has a mental problem. In a case like this, because of their mental illness, committed crimes but it was caused their mental illness. What will happen?*
12. *That those who have drug charges or addicts get treatment before being allowed Section 8 or PHA.*
13. *CRIMINAL HISTORY SCREENING: I think this should be implemented, I thankfully do not have a criminal history. But my neighbors who are also SAHA tenants are also having cops come and randoms at their homes. I even saw police come out in shock from the women apartment above me. They said she was real high I was also concerned because the kids. The woman downstairs seems like she has so many people living in her place. I do not make reports on my neighbors I am sure the office is aware. They don't bother me and I do not bother them.*
14. *I don't think that those with prior serious criminal offenses should be housed with vulnerable population like the mentally ill.*



Additional Comments

Survey Text:

Please share any additional comments or questions you have about this survey, the proposals, and/or your responses.

Kudos / Good job:

1. *Just in tirely grateful to have a place to live and I thank God everyday for Saha*
2. *I agree with the proposed administration changes*
3. *A mi parecer es lo correcto y en base a ello son mis respuestas.*
4. *It's fine.*
5. *I love how your working with us at this hard time*
6. *Case Managers due excellent job in helping get through this crisis! Thanks SAHA!*
7. *Stay nice!*
8. *Glad to see some changes are being made*
9. *Doing an amazing job to help us the less fortunate & I just want to thank u for all yaw do for us!!!*
10. *"Thank you i love what yall do!!! Honestly ive came along way on this program still 1 kid..lol thank god ive gotten my PnC licence thank you!...*
11. *Thank you for the services available I am grateful to have this available for someone who is disabled and wishes things were different so that I can be self supporting declining outside contributions and I hope that one day I no longer need the services and be able to give up my spot for someone else that may be needing shelter*
12. *Thanks for the Saha Program*
13. *I appreciate, thank you*
14. *I think you did a great job for this survey because I'll let you know where each person stands for feel while they're living and their own Apartments this is more private and safer for Saha to know what is going on when they're not around thank you and God bless you.*
15. *Todo cuanto hace Saha es para beneficio de esa comunidad de la cual hago parte y creo que siempre estaré disponible para dar mi apoyo en todas esas propuestas que dan a la comunidad para una vida mejor.*
16. *Hemstview apartment are the best ive seen that allows section *[8]*
17. *It's about time they really try to help the poor*
18. *The purpose is are all fantastic. Great job on recognizing us little people who make \$10,000 or even less a yr*

Rent calculation:

PRE VS POST TAX

1. *You should not go by how much you make before taxes to pay rent because before taxes is way different than after*
2. *do not go based off before taxes when it come to rent because that not what the person have*
3. *When the 20 percentage of the GROSS income is used to determine the portion of my rent and not taking into account that medicare insurance MUST be paid the amount is usually a*



large portion of my check, leaving all other expense to be reduced or eliminated, at my age I take a lot of medication, I am required to have Insurance for my vehicle, and now insurance for my apartment. A nice apartment is no longer an option for me.

COLLEGE STUDENT

4. *If a family has a college student who receives FAFSA and attends college locally, does SAHA consider this government money awarded to college student to calculate and add to the family's income?*
5. *I feel that all children going to college should be able to stay with their parents who are on housing without any repercussions. As long as they are enrolled and attending college so they will not make the same mistakes that their parents may have and be able to live a healthy life on their own after graduation and can become an outstanding citizen. To break the cycle of becoming on a housing program themselves. Give the children a better future for themselves.*

RENT INCREASING TOO FAST

6. *I have a below poverty income and every time I rent goes up it's more and more of a struggle and I must wear that the rent goes up according to the area I live in they said*
7. *Our rent gets raised pass the mark currently. When we moved in it was \$1200. Now it is \$2054 and our landlord has not improved living conditions at all. Just fixes to pass.*
8. *????? NEED TO CAP RENT ON CERTAIN APT COMPLEX RENT GOES UP BUT THE COMPLEX THE SAME THE RENT WILL BE 1000 DOLLARS ONE SAY FOR A ONE BEDROOM????????*
9. *I feel that due to the popular uprising in my neighborhood, that I would be priced out of it.*

DISCREPANCY BETWEEN COMPARABLES

10. *How can it be fair when an upgraded apt. is 1200.00. Yet an apt. that has NOT been upgraded is also 1200.00 in the same apt. Complex?*
11. *What I don't like is that if two people have the same income and one lives in a 450 sq. ft. apartment and the other in a 900 sq. ft. apartment, they pay the same rent. Very unfair.*

LIMITED NEIGHBORHOOD CHOICE

12. *It helps to be able to choose your own location for a good place to live and that helps a parent get some kinda of dignity.*
13. *we are all ready very limited most are in west and east side. I cant do that*
14. *Limited to where you can live; need to net work with other apt on Nw side of town it's like we can only live in certain locations or apt.*
15. *Better and suitable selections in housing units and apartments.*
16. *There are limited number of houses available.*

OTHER

17. *I think SAHA needs to pay the correct amount of rent going off average that the city is charging rent and not so low.*



18. *I feel fair market value should be considered when approving rental increase.*
19. *no late fees*
20. *Disabled n seniors should receive a ' CAP' ' as to rent amounts.*
21. *Now that the non reimbursable expenses have been eliminated from being used to reduce our portion of the rent, how are we suppose to be able to ever afford to live in a nice apartment complex.*

Property quality / appearance:

1. *A complex shouldn't look like "the ghetto" just because majority of its tenants are on Housing especially when THE OWNERS are multi millionaires that own 30+ other COMPLEXES and reminds you of that EVERYTIME you bring up an issue.*
2. *I AM MY MOTHER'S VOICE . I WILL CONTINUE TO BE HER VOICE BECAUSE YOUR SYSTEM IS BROKEN. It's easy to just sit back and judge all the people you help. Margie Flores right's are she still able to live on her own, however where she lives no one bother to look at all the defects and slum where people live day in and day out infested with roaches and water that's stagnant for weeks where once a pool stood mosquitoes are living and children play in it. Someone needs to go investigate . Vera is the Manager . Canlen West Apt.*
3. *You need to focus on having healthy envirnments... CLEAN THE VENTS PROFESSONALY ONCE A YEAR...CLEAN YOUR APTS*
4. *Before move in of clients with same expectations of an apartment building renting at full price.*
5. *If an apartment or property is old it doesn't mean it has to be in disarray and not have paint or door tracks clean 4 tub grout cleaned*
6. *I'm also going to reiterate the vents in all the units where I am at are disgustingly dirty and nobody seems to care what's blown out of them did I'm breathing in on a daily basis.*
7. *In March, mgmt cancelled ALL Pest Control services. I went in to report that the Pest Control services I'd scheduled -- DIDN'T show up & that roaches were appearing-- in broad daylight! I was told that, oh, they weren't doing any more Pest Cont services; Residents can treat their apts "" on your own. "" . I live in a building that was built in the '70's & the only way I've kept the roaches out is by getting my apt sprayed & baited every 2 weeks. I don't want to lose my home due to roaches!*
8. *Require units To upgrade appliances in units*
9. *It's the units that are awful. 2 units I've had with non working ac and leaking pipes. Then when i report it the landlords come to the house and harass me and my children*
10. *2. Ensure properties actually have things that are listed. i.e our apartment stated they have laundry facility on site. They did not have one for the first 6 months.*
11. *I wouldn't necessarily say the units in Converse Ranch are "of quality". The main office kitchen has stainless steal appliances, the units don't, there's a pipe above the tub in the main bedrooms bathrooms that constantly leaks, mine has caused rust and the walls/doors need to be caulked or the flooring changed on the first floor apartments. I've had everything from Rollie pollies to crickets and scorpions in my units.. a lot of them, they're coming in from somewhere.*
12. *My housing had NO heat all winter and SAHA passed them on a special inspection.*



13. *ALL the units in my complex need LOTS OF REPAIRS. ALL THE KITCHENS AND BATHROOMS are falling apart. They need to be gutted and replaced with brand new cabinets and counter tops.*
14. *There are so many SAHA units/ housing that are infested with roaches , mice , rats and the pest control doesn't wrk & the glue traps work only if the mouse goes to it which is only maybe 50% of the time. That needs to be addressed & made a priority.*

Rent-to-own program:

1. *Rent to own program would be an excellent step for a lot of single mother's or families*
2. *If a tenant is paying majority of they rent, you should put them in a home buying class and help them become home owners.*
3. *They need to offer the program to own you own house if you have been on the section 8*
4. *Believe that more information is needed for the program where SAHA helps with buying a house*
5. *please put back into operation: the housing choice voucher homeownership program referral cause it is the only way i can get myself a house due to my credit history being bad . the current purchase of new housing homes is unfair due to the buyers wanting to get people into these houses on the west side that are hispanic an don't have an ounce of good credit history but are given home loans to buy houses they cannot afford. this is unfair an to get back to fairness an not have this reported to hud please put back this homeownership program called the housing choice voucher homeownership program.*

Voucher:

Voucher value

1. *I think Saha should do a better job when giving out rental vouchers some areas required more than the voucher covers.*
2. *The cost of living has gone up and the amount of our vouchers should as well it's hard to find a good 3 bedroom home in my voucher range*
3. *Y'all give the lowest possible vouchers making it nearly impossible to find a nice home.*
4. *Vouchers should definitely be worth more so that people can live in better communities*
5. *Seems like most landlords wont take the voucher amount in nice neighborhoods leaving clients in bad neighborhoods or bad apartments*
6. *Its herd to find a nice pce to live on some of the income limits.*
7. *There was only two complexes I could go to, in the area I wanted, due to the low amount of housing voucher.*
8. *The vouchers are to low, for this economy*

Other voucher

9. *It is always hard to find a place that will accept me because my credit . Hard to find a decent place in the amount of time given .*
10. *An amendment could be considered also for a smaller 3 bedroom house, there are not too many 2 bedroom houses that are not in crime infested areas, why should the family be forced*



to live in such conditions or forced to live in an apartment. Maybe they could be allowed to pay the difference so as to not repeat a vicious cycle of crime and lower quality of life.

- 11. I would love to see more listings for homes for rent that accept section 8.*
- 12. I would love to live in one of the newer apartments downtown where I crab walk to work..i wish they could be added on to the section 8 program.*
- 13. Not enough property choices (Houses) that accept Section 8*
- 14. A lot of apartments have been bought, refurbished and no longer accept the vouchers leaving only older apartments in less desirable areas available and within allowed price range*
- 15. I have seen some horrible leases, rent too high, and dangerous areas.*
- 16. It is extremely difficult and frustrating looking for a home that accepts hcv, especially in a safe neighborhood.*

Inspections:

- 1. Inspectors are slacking when units are checked prior.*
- 2. SAHA inspections should always be very thorough.*
- 3. The inspectors are no shows the majority of the time we wait & that is an inconvenience to us residents. The gap for inspections is a 2 week wait time!!! To long*
- 4. Our units are old and although we are blessed it doesnt feel okay to reside somewhere years and after three you are charged for a clogged sink or smoke detector and possibly face eviction when inspections arent being complete when notices are on doors.*
- 5. When a door has no wood for screws how can it pass inspection?*

Management Behavior / Attitude:

- 1. In my experience of the last 15 years with SAHA employees, they are all professional and go out of their way to accommodate tenants/clients, however, SAHA's private contractors such as Lincoln Property Co that manages my property appears to violate many leasing principles and nothing occurs to them when this occurs. Is it because their private attorney has influence with the SAHA Board that other attorney's do not or they receive preferential treatment?*
- 2. When can we have a Male representation here at SAHA Property managers, I've noticed a lot of Bias- Favoritism & sexist remarks against certain Male Tenants here at Lewis Chatham APT.*
- 3. The Apt Mgrs hide in the Office & no longer walk the property.*
- 4. There's a lot of illegal activity that the property manager doesn't care to see*
- 5. I don't think that the staff respects the tenants or those of the disabled. Especially the staff or property owners.*
- 6. Your private contractor/partner, Lincoln Property Co. does not abide by federal statutes to attain the above goals!*
- 7. Many OWNERS do not take pride in their properties nor their tenants. Owners and Representatives have the "they're on Housing, they won't complain" attitude towards their Tenants.*



8. *The mgmt here refuses to do anything about residents who disturb the rest of us-- Even posting the City-wide Quiet Hours is more than they'll do.*
9. *The only problem is that they do not check on other attendance. There are so many people living with people that not even in the list. There are some people that follow rules and some of them that don't follow the rules and they do what they want to do do here. I tried to just stay in my apartment and I tried to mind my own business. There was gunshots fired. I don't want them to think that I'm treating on one person or another but I see a lot of things that and I hear a lot of things. But as for me and my husband we feel safe in our little corner thank you and God bless you all.*

Help moving

1. *I really need help finding a unit wheel chair accessible on section 8 no more than 800.1 bed room near medical center. more than a year my foot doctor has been waiting for me to move. where can I get help with this issue?*
2. *I like where I live but not sure how to go about moving to a different location if needed*
3. *I wish the moving progress would have been a topic listed. Some clients feel stuck in a unit because of the time it takes to setup payment to their new residence. The length of time it takes to establish/ finalize paperwork places the full amount of the rent on the clients shoulders. This causes additional stress and anxiety because if the client could afford to pay the full market rent they would need SAHA's help.*

Landlords:

1. *Please do something about my landlord. Property falling apart and he doesnt seem to care. But he wants his rent. Not fair.*
2. *The issue of Reasonable Accommodations should not penalize the tenant by withdrawing assistance. I do feel the landlord/owner should be penalized in some manner.*
3. *Making sure tenants are being treated fairly by landlords and they are abiding by the rules as well to keep tenants and land lord relationships in good standing*
4. *It seems we are judged. We get what we're given and be satisfied. This is how landlords treat a lot of people at many places. I live in one now. This landlord owns 22 properties in San Antonio and fails to keep up with properties that need work done.*

Contact / Feedback:

1. *I tried to get a hold of your legal department but can never get through.*
2. *Drop Box Slot , for Safe anomomous Comments Concerns, Complaints.*
3. *ive been trying to get thru to someone my work hours have dropped big not making the same anymore with all this going on is there anything i can do or something to get my rent adjusted if so can some one call me please i have my check stubs ready thank you again!!!!"*
4. *Hard to reach offices*
5. *SAHA staff do not respond to phone calls, appeals, etc0000. I filed an appeal in December 2019 regarding my rent increase and the confusing notice I received regarding that increase.*



As of today, April 10, 2020, SAHA has not responded or communicated with me about this matter. In past years I have called SAHA to speak with someone about the increases in my rent but the response I received from the SAHA agent did not address my issues.

Neighbors:

- 1. At my apt complex, we have huge problems with: 1. People on the voucher program are allowing extra people to move in/live with them-- People who are NOT on the lease lounge around on the stairways, making it difficult to pass by. They're outside talking loudly until 2 or 3 in the morning, making it hard to sleep.*
- 2. Pedirle a los vecinos cn perros q los callen a las 2 am pq ladran y ladran.*
- 3. It would be safer if residents wouldn't let their boyfriends who have criminal histories stay with them. Drug addicts and drug sellers.*
- 4. The Apt mgr is married to a black man, so she rented out 5 apts to young black women. They're making all the noise & their boyfriends sell the drugs. The Apt mgmt & her assistant just sit in the Office, won't even walk the property.*
- 5. My daughter and I don't feel safe where we are living at all due to a neighbor who has been bothering us throwing debris to my porch apartment coming down to be hitting my door throwing stuff in my front door. And poring water from his up stairs apartment to mine in the lower bottom. I am tired of them doing this to us in which we don't do anything they are the ones who stopped, run and make loud noises from 11:00 pm to 8:30 am. There are days we can't sleep and I take medication for anxiety and depression after all noises I am unable to sleep. I wish some can get back to me soon.*

Staff:

- 1. Anybody you guys hire or partner with including apartment complex NEEDS to take classes on how to interact with residents. Most of these front office people are coming off as overwhelmed and taking it out on us residents and rude!*
- 2. I think that if you receive your section 8 voucher and the "case worker" completely ignores the future resident they should be able to get the apartment that they chose even if the voucher was 1 day late.*
- 3. Another suggestion is having better training of the employees giving participants of the voucher their information. Along with having separate meetings for disabled people on any of these programs.*
- 4. The staff at Saha offices interact with such desensitization and very condescendingly. I have NEVER had a good or acceptable experience in person. People representing saha have in my personal experience not in the least maintained and demonstrated professional assistance without rude or unhelpful run around regarding answers or paperwork.*
- 5. Satisfied except for staff at Madonna apartments. No common sense and no people skills.*
- 6. The staff I have dealt with, not so great.*
- 7. The staff and head maintenance are horrible at Mirasol*
- 8. But professionalism is somewhat not all that. Some saha employees can be very rude and don't even want to help.*



9. *My experience with SAHA representatives have been unsatisfactory most of the time."*
10. *Housing have change some take pride in how they talk to customer some are rude.I was told that they sent me a letter found out it was not true, none was sent to management where I live, some changes have come to Housing, the respect for clients are far in between. Paychecks take the place of kindness not how to treat the Clients are treat them with respect, but let one get out place with them then they are ready to remove them. Respect work both ways. I do not like calling Housing if I can keep from it.*
11. *I had an incident where a maintenance man came to do some work but I did not request it. He tried to play it off as if 'I' was the person whom filled out the form. Things are tough enough without people whom should be not only responsible, but in a position of authority to act like they have common sense. And not only that respect the people that live in their complex. If you want respect I suggest you give a little instead of sneaking around doing sneaky shit as an employee.*
12. *Staff is not available daily*
13. *I feel the staff in the front are so quick to turn your clients away. As I had sat there a few times I witnessed how poorly the disabled are treated. I feel the staff does not know how to deal with diversity. Also, they are incentive to ones needs. I also helped my disabled veteran father with his SAHA issues and they were never resolved. I have no idea how his apartment ever passed inspection his living environment was inhabitable. Sadly my dad passed away and since he is not with me for complaints SAHA gave me a hard time. I have a long paper trail with the stuff submitted and pictures I took of his apartment. His case worker simply said my father chooses to live like that. So now I see this agency in a different perspective.*

Work orders:

1. *Maintenance do not answer work orders. My A.C./heat unit has been broken for two years. I have to live with the heatwave in summer and cold weather in the winter. I have submitted several requests for this work order to no avail.*
2. *I have been waiting for work orders that I have placed over a year ago and they still have not been fixed. The property manager was ready and willing to give me an early release just so they wouldn't have to fix any of the problems I have such as a poorly working stove, leak in the front restroom toilet, leak in the 2nd. bedroom wall, leak in the bathroom sink in master bedroom, insects, I've only received pest control once since I've moved in here which was 6yrs ago even though I put my name on the list. I also have a non working garbage disposal that clogs every other week. I also have mold growing in my bathroom under the sink, cabinet is warped from water leak, they never came to fix it. The vent doesn't work, and they wanted to charge me to replace the sink faucet. My refrigerator doesn't stay shut, food goes bad and I'm on disability and have to constantly be buying food. I also have breathing problems so the mold in the restroom doesn't help. Laura Romo 1938 S. Zarzamora ST. #8101 2109010632*

Recertification / burden of process:

1. *As a disabled veteran with limited income it is quite taxing at times when I go through recertification to roundup everything that is needed etc.*



Parking:

1. *Deberian enmendar lo de el primero q llegue tiene el parking pq hay residentes q pagan su renta y tienen q estacionar lejos. Rotular el numero de apto cn el espacio de parking.*
2. *Parking*

Incentive program:

1. *I think a program should be developed for housing participants that work on having good credit, rental history and how clean they leave their rentals. The award could be a reduction of rent. I think it would be a good motivator for renting and the home ownership program.*
2. *Incentives to do better at job positions and applying themselves to bettering their lives. Goals*

Security:

1. *Poner mas seguridad.*
2. *I think if it applies also for SSI recipients! DRUG TESTS FOR ALL LIVING @ SAHA APTS!*
3. *Everythings amazing except hearing gun shots throughout the night .*
4. *As we live in these places . They are run down and people are subject to all types of crimes.*
5. *Safety: Door guards, latches, & locks leave to be desired*
6. *4. I definitely do not feel safe where i am too much shooting*
7. *Quality of affordable housing a little questionable. No constant security and now during this pandemic less visibility of Any staff or cleaning of hallways..elevators..parking areas*
8. *I don't feel safe where I live!*
9. *I don't feel my kids are safe to play outside because the slide on the playground has a huge hole they could get hurt if they tried to slide down.*
10. *The apartment complex I live doesn't feel safe*
11. *Some of the properties are high in crime and drug activity.*
12. *Too much violence in this area*
13. *I have never felt safe & you get retaliation!*
14. *Not safe*
15. *my building is not normally a safe place for a disabled senior citizen, & is often dirty,*
16. *I don't feel like it is a safe street I live on and I it is not really affordable*
17. *Ive reported the complex i live in is not safe environment and some of living arrangements are not up to date.*
18. *My housing is neither safe nor watched over properly*
19. *Safety and security of the Property*
20. *I've had many belongings go missing from my apartment only when the maintenance people enter without my knowledge.*
21. *Need some security. A lot of gunfire...*
22. *There are many drug dealers in front of my Senior living building and my door is always broken, which is a hazard to us all.*

Direct services:

1. *Do more 2 help clients get off the program n support themselves.*



2. *Any programs helping & educating our youth to better themselves to Be productive in society is a plus.*
3. *Yall help people who dont help them selves but let go of the people who need help*

Specific detailed case:

1. *I thought SAHA was going to help me out with knowing the changes needed to see my apartment was not up too par with my living here in this apatment but instead passed my apartment even speaking with my worker about it was not passible, instead she said, i was never your specialist and could not help. Its now going to be a year and i gave up on trying to ask for anything because they looked over my apartment and why did they tell me to move. I was forced with my voucher last year due to management calling SAHA to find out my appt time and date. The specialist gave her my info. And i didnt even have my lease which was not done at my time of appt. and the specialist said its ok, we can get your voucher and lease done in my office, she called the manager and did the lease over a phone call. This was very unethcal with SAHA.. I had case manager with me and she heard and saw how everything has happened. I wish you would not cover this up. So much back up i seem happened.*
2. *I have tried to move due to my x boyfriend coming out of prison, he went back in , I felt it was best to stay in my lease, because not only he went back in, but i didnt have the money for a application fee and deposit and move out help. I sent in a void to cancel my move, the speciallist did not contact me, and it took a new specialist to fix this today! It has been 2 months sice my apartment not recieved their portion from SAHA. I was told by mgr. to pay SAHS portion or I would be evicted. I paid it staying with no monies because i was scared of the lock out. I called SAHA and instead of looking about how i gave them all my money, the specialist said she couldn't due anything about that, its a legal matter and for me to pay the money. No ive been thru alot here where I live and its not safe here.*

Mailbox:

1. *Please consider the mailbox idea. I'm disabled, and if I didn't have a provider, I wouldn't be able to check my mail.*

Communication / Education:

1. *Make known of the different programs available*
2. *My understanding is that SAHA provides affordable housing for individuals that can work. All the meetings I have attended do not mention anything about disabled individuals that are not able to work.*
3. *I think the communication between staff could be much better for making new residents and with one already there.*
4. *Im just curious why your office does not call or mail the tenants a post card stating that the Sec. 8 application is "open". And we can apply. I have been waiting for years and then I always hear after the fact from a neighbor that it is now "closed". Why do yall wait on the News to alert the public of the opportunity to sign up for another better housing opportunity for*



deserving ones? Also I have been informed that I can't ever move from my place to a better living arrangement, because of my Voucher Program.

Survey critique

- 1. Some of the questions are a bit difficult to understand, it may need clarifying in more simpler terms, as per an example. Several tenants do not have higher education and may choose option 3 in this kind of feedback. Thank you*

Housing / Unit Supply:

- 1. Available units should not merely reflect household size but also show consideration for unit size. Also, people who stay within budget should have the option of getting the greater bedroom size (ex: 4 versus 3 bedrooms).*
- 2. I feel accessible units should be a high priority since accessible units are limited & and very needed.*
- 3. Need more safe affordable housing*
- 4. Lacking in supply and diversity appears landlords are dictating availability and slightly overcharging the program in a coordinated Accord.*

Utilities:

- 1. The utilities can be a bit pricey for some individuals to maintain with out issues need Further assistants*
- 2. Utilities are too high because property management has a self made formula to calculate a tenants water and sewage usage. My bill is \$70 to \$80 per month and I spend only 6 hrs a day in my apartment, mostly sleeping. I spend less time in my apartment on the weekends than Monday through Friday .*

Negative Assumption:

- 1. I am very dissatisfied that SAHA still allows owners to be non federal law compliant because they have people to house*
- 2. The mafia runs this. .. But saha and sapd work with them so this isnt New!*
- 3. YOU SHOULD NOT 'SIDE' WITH LANDLORDS OR MANAGERS. GET ALL THE FACTS FIRST!*
- 4. most section 8 housing arent the greatest place to live.*
- 5. I agree, some charge more rent to the person on Housing and are not treated equal.*
- 6. It's almost like they don't care about the housing units because when I was living in a unit here before I got approved for housing paying full rent I had none of these problems, except the appliances.*
- 7. Why comment. My opinion does not matter.*
- 8. Whenever they have a party or celebration for the residents the whole theme is always Spanish music or Spanish entertainment.. we cannot even speak spanish and that is racist on every level.*
- 9. SAHA got me evicted and kicked off section 8 for not doing their job and I am a disabled veteran.*
- 10. I just know I'm dissatisfied with my complex*



General / Unclear:

1. *Do what is best for housing and for the people.*
2. *Yes..better to be safe*
3. *Don't really understand*
4. *Well it depends how u look at it I'll would look over it two times befor I make decision*
5. *Strongly for it. We all need to feel safe and secured at our homes/community.*
6. *Not understanding*
7. *jack tovar*
8. *Polling tenants about stay is needed for assistance in helping them get out. We have been trying for years. I know have a master's but live like I just started college because we are stuck in a system that doesn't help us get out.*
9. *I would like to see these proposals and be a help to give opinion of a resident perspective.*
10. *I feel like more needs to be done about the those who are on the program.*
11. *I don't know if I understood each question correctly but clicked on what I thought was best*
12. *We all should have a meeting*
13. *all of you and your families please be safe*





SAHA 2025: What do you think?

Survey Responses / May 7, 2020

SURVEY GOALS

2

1. Mitigate impact of COVID-19 on feedback and schedule
2. Collect public comment:
 - a. MTW Activities (New and Modified)
 - b. ACOP and Administrative Plan Changes
 - c. Strategic Plan (Key 2025 Outcomes)

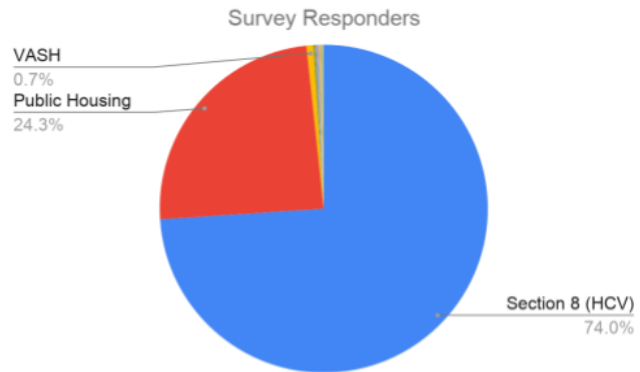
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DELIVERY AND RESPONSE STATISTICS

3

1. April 9 - May 2, 2020
2. Sent 8974
 - a. Bounces 691
 - b. Successful Deliveries 8283
 - c. Opens 4721
3. Survey responses 893
 - a. English 884
 - b. Spanish 9
 - c. HCV 74.0%
 - d. PH 24.3%
 - e. VASH 0.7%
 - f. Other 1.0%

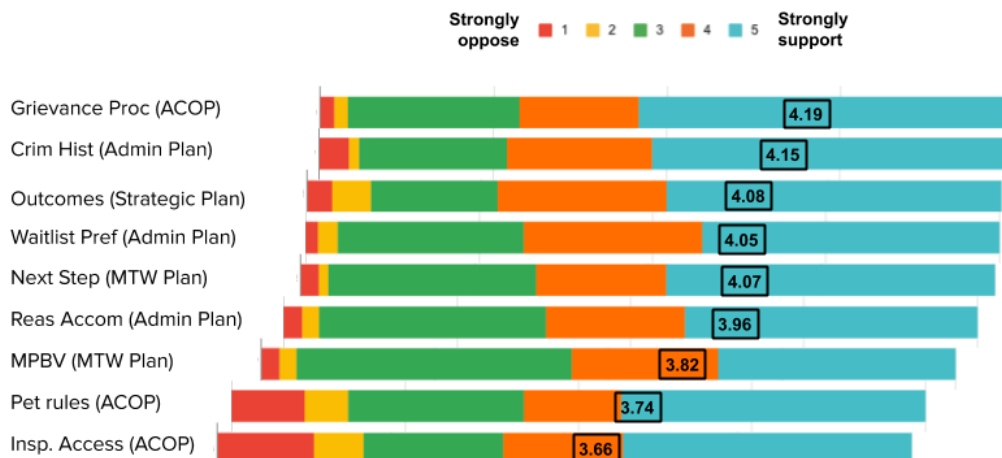


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RANGE OF SCORES

4



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GRIEVANCE PROCEDURE (ACOP): 4.19 AVG

5

Changes to this policy will require SAHA and third-party collectors to **pause debt collection** during the grievance process. The proposed changes would also require that the following charges be paused during a grievance:

- **move-out charges**
- **charges against the security deposit**
- **late fee and non-sufficient fund (NSF) charges**
- **maintenance charges**

Free Response Comments

Support: none
 Oppose: none
 Other: 1

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CRIMINAL HISTORY (ADMIN PLAN): 4.15 AVG

6

This change states that when SAHA is screening applicants to the voucher programs, SAHA will only look at previous criminal offenses that resulted in conviction, from the date the offense occurred (not the date of conviction). According to the SAHA's criminal history screening criteria, which can be found in the current Administrative Plan, SAHA will look back over different periods of time depending on the severity of the offense.

Support: 8	Oppose: 10	Other: 14
<p>Some people deserve second chances, must take a good look at charges before judging</p> <p>I don't understand why a persons past has anything to do with the present. Once you have paid society for the crime that should be the end of it, not follow you forever. Let it be a fresh start.</p> <p>...people change so something that happened over a decade ago shouldn't stop them from getting assistance</p> <p>I think it's a good idea to run a criminal screening & also give a former criminal a chance to find a place to live.</p>	<p>SAHA should give those that have convictions a 2nd chance</p> <p>SAHA NEEDS to...not look at just the recent convictions, but EVERY crime they've ever committed</p> <p>I am aware that all people in life make mistakes and need the opportunity to start fresh and that sometimes it's hard to do when you're coming out of prison or jail but think that checking past Criminal offenses would be for the safety of everyone</p> <p>SAHA should have a zero tolerance to any crime of any degree or offense.</p>	<p>Just bcus a person has a pass eviction shouldn't deny a person to have a place to live</p> <p>Is there a point of doing a criminal history when most of the tenants have people living in units that aren't on the lease?? How will Saha check those people??</p> <p>Drug test & continue to drug test</p> <p>Sex offenders and pedophiles should not be allowed to rent in SAHA residents/apartments.</p> <p>What if the applicant has a mental problem. In a case like this, because of their mental illness, committed crimes but it was caused their mental illness. What will happen?</p> <p>I don't think that those with prior serious criminal offenses should be housed with vulnerable population like the mentally ill.</p>



2025 OUTCOMES (STRATEGIC PLAN): 4.08 AVG

7

SAHA proposes the following six agency priorities through 2025:

1. A supply of affordable quality units exist in sufficient quantities for SAHA Clients
2. SAHA Clients live in quality affordable housing
3. SAHA Clients have access to sufficient / affordable utilities
4. SAHA Clients feel safe
5. SAHA Staff respect and value diversity and inclusion
6. SAHA staff thrive in career and professional work

Satisfied: 8	Not satisfied: 10	Other: 14
<p>Your priorities are strong and show respect for all who are in the housing programs</p> <p>Nice apartments are popping up and all the projects have disappeared, however, Quality over Quantity. Don't push the poor out with exhausting qualifying standards</p> <p>Every one should feel safe and comfortable and at peace in their homes.</p> <p>Everyone should show and exhibit respect.</p> <p>Moving up in a career is ideal. For some it's not that easy. Showing your employees growth opportunities may have bigger impact on turnover</p>	<p>Number one of six already exist. SAHA should ask those clients specifically how they feel about their living arrangement.</p> <p>I don't know why you would include items 4 and 5. I have no input on staff and how they thrive, etc.</p> <p>Given all the harassment of tenants by SAHA staff, there should be a goal about improving those relationships. Also, SAHA would benefit from a goal that centers maintaining the human dignity of their tenants</p> <p>These are definitely goals because i can speak from experience that 4 out of 6 are not being met and need a whole lot of work to get there.</p>	<p>Would SAHA make current residents move to these units or are they for new residents? Also my concern is the location of the units.</p> <p>Not clear on SAHAs impact on utilities (#3), as a participant for many years I am not familiar with this. Also does #1 include funds for the HCV program? If not should that not be addressed?</p> <p>Please enforce that us residents are being treated with respect. There is a certain energy that we are NOT as respected and looked down upon because we are not as fortunate as the staffs. I've seen views on both ends as a curtain section 8 resident and as a former social work major</p>

NEXT STEP (MTW PLAN): 4.07 AVG

8

Next Step Housing Program (THRU Project). SAHA seeks to partner with the THRU Project to provide supportive services for foster youth aging out of foster care. SAHA is seeking regulatory changes to support: (1) a rent cap of \$100.00 for foster youth in the first year and (2) a time-limit of three years with the option of an additional maximum of two year hardship extension.

Support: 10	Oppose: 5	Other: 12
<p>The foster idea is great it should include incentives for youth going to college or enrolled in a program to receive a certificate or degree</p> <p>I aged out of foster care at 18 with nowhere to go so i strongly love this</p> <p>I dont understand if The 100.00 is for rent in someone's house or their own apartment. Either way that's good.</p> <p>For the THRU project, will there be financial counseling, a mentor for guidance. Will there be guidance on school and getting into the workforce and being able to sustain a home while living on their own.</p>	<p>As far as the Foster Kids aging out, it is a wonderful program but \$100? With how much apartment cost to rent, they can only end up in a bad area. That is setting them up for failure.</p> <p>On the first question regarding foster children, I strongly oppose any child mixed with seniors.... I believe that they should have other family living quarters away from the elderly.</p> <p>I would support the rent cap if the youth is provided some form of job training, support, or case management for at least the first 6 months to ensure they are able to manage the responsibilities of independence because with the increasing rent prices \$100 would not be much help and the youth could end up homeless.</p>	<p>Not sure what the MTW activities are?</p> <p>I do not have sufficient information about those programs to make an informed decision</p> <p>Since these aren't written in common sense language I oppose them.</p> <p>Not to sure what all means maybe you could go into more details in a simple English way where we as seniors can understand it better.</p> <p>I'm sorry I thought the survey was not understandable I was unable to give a good answer or survey due to the fact that I'm not aware of all the things that are being offered now or want to be offered for example mtw activities I wish I could have answered it better if I understood more of it</p>



WAITING LIST PREFERENCES (ADMIN PLAN): 4.05 AVG

9

This change will allow all Mainstream Program (one of SAHA's Special Programs) vouchers to be issued to applicants who are referred by partner agencies. This update would also note that the number of vouchers available for this program have increased from 179 to 238.

Support: 0	Oppose: 0	Other: 2
		<p>I am disabled and I also have a son who is under age of 13 and I've been waiting years for section 8 to receive a home for us two but I have only been called to go to apartments and I don't want to be living from apartment to apartment anymore my child needs a stable home and I strongly believe that the waiting list should be handled differently so that people like myself a single mother paying full rent and bills can get help.</p> <p>yes maybe help find a wheelchair accessible unit that take section 8 voucher and according to age maybe even a 55+ unit that feels like a real home with windows or patio /balcony no carpets central air and heat with a view of other then next building patio/balcony</p>

REASONABLE ACCOMMODATION (ADMIN PLAN): 3.96 AVG

10

Changes to this policy will include the statement that landlords and owners must adhere to the Fair Housing Act and the Americans with Disabilities Act (ADA). The change also includes actions that SAHA may take if those laws are violated, including but not limited to denial of a requested tenancy, abatement or suspension of assistance payments, termination of the assistance contract or debarment of the landlord / owner from program participation.

Support: 1	Oppose: 0	Other: 5
<p>I also appreciate that landlords & management can't discriminate against those with disabilities.</p>		<p>Your private contractor(s)(landlord) need to have an immediate debarment mechanism in place if the tenant's are not afforded their reasonable accommodations within a reasonable amount of time, especially if the landlord has numerous violations against them</p> <p>If the landlord/owner do not adhere and they have used the funds they were given to fix their complex, besides remove them from getting anymore funds and not be able to participate, they should also be liable for the money they used. Otherwise they can fix their place and then get out of having "Section 8" tenants, which they probably didn't want in the first place.</p> <p>If landlords do not comply with their end of the agreement, as in property up-keep, maintenance, etc, the landlord should not be allowed to rent to clients under SAHA, or Section 8.</p> <p>REASONABLE ACCOMMODATION POLICY AND PROCEDURES: I agree if SAHA is willing to help the tenant. I heard a woman come in to the SAHA office in tears because the landlord said he was raising the rent. The woman at the front window said landlords can not do that. But the woman was still worried. I feel the lady working for SAHA should have not let the woman leave without a document stating her rights and in black in white that the landlord can not do what he is threatening.</p>



MODIFIED PBV (MTW PLAN): 3.82 AVG

11

Modified Project Based Vouchers (MBPV): SAHA seeks the ability to determine, on a contract-by-contract basis, whether to use Metropolitan Area Fair Market Rents (MAFMR) or Small Area Fair Market Rents (SAFMR) for Modified Project Based Vouchers (MPBV) at specific properties. MAFMR reflects average rents across the entire metropolitan area, while SAFMR reflects local market (neighborhood) rent averages.

Support: 0	Oppose: 1	Other: 12
	<p>As for the MBPV I think you should use the small area fair market rents for this project because not all one area have the same average income. Within the areas there are many small areas that make way below the average income or no income at all.</p> <p>My mother shouldn't be subjected to your Modified Projects she's too old to worry about your success after living through the Embarrassment of the system failures.</p>	<p>I'm unsure about the questions</p> <p>Not sure I understand the question sorry.</p> <p>I'm don't quite understand this question. Simplify it please.</p> <p>you co. did not properly explain the last 2 questions regarding foster program or the voucher program enough for me to make an educated decision or opinion.</p> <p>Please clarify</p> <p>Information explaining what this is should be included with this question in greater detail.</p> <p>MAFMR, AFMR, MPBV I would like to see the break down and more details of this proposal.</p>

PET RULES (ACOP): 3.74 AVG

12

Residents would receive a one-time, 24-hour warning before being charged the unauthorized pet fee. The total amount of fees would be capped at \$200.00 total and can be applied to the pet deposit upon approval by SAHA. Households with multiple unauthorized pets may have an additional charge of \$10.00 per month NOTE: Service and assistance animals are not considered pets, so fees do not apply.

Support: 10	Oppose: 11	Other / Address abuse of existing rules: 8
<p>The pets rules are a welcome</p> <p>I believe that a higher pet deposit should be enforced unless the pet is a service pet and or not even allowed in apartments. Higher deposit and ONLY ALLOWED IN A HOUSE.</p> <p>Yes, the additional pet charges are a necessity.</p> <p>All rules applied to everyone who desires a pet with them.</p> <p>As for the pet I wholeheartedly agree.</p> <p>Service animals should not be charge to tenant</p>	<p>Pet deposit should stay at 150\$</p> <p>Don't charge for us seniors to have a pet it's out rages we only want company.</p> <p>I am not happy with this option. What if like myself my parents have passed away and they had a wonderful little perfectly trained dog and would have gone to the pound if I would not have taken her in. I didn't not want or plan to have a dog but she is the last thing I have of my parents.</p> <p>I don't support because sometimes pets are like family</p> <p>paying rent for pets are not fair deposit yes because they do mess the carpet up and it smell when new renters move in</p> <p>There should be NO pet fee or pet 'rent'.</p>	<p>Where I live many have big size dogs. Yet many temporary relocate the animals when inspection/pest control noticed come out. So is there really a point in trying to charge unauthorized pet fees??</p> <p>Yes and they must enforce the leash Law for the pets.</p> <p>And someone must go to the apartments and make sure the owners secure the animals and not get on top of the other people's cars so that can eliminate the stray animals</p> <p>Lots of residents have unauthorized Birds/ parrots... Making lots of noise?!!!</p>



PET RULES (ACOP): 3.74 AVG (page 2)

13

Residents would receive a one-time, 24-hour warning before being charged the unauthorized pet fee. The total amount of fees would be capped at \$200 total and can be applied to the pet deposit upon approval by SAHA. Households with multiple unauthorized pets may have an additional charge of \$10 per month NOTE: Service and assistance animals are not considered pets, so fees do not apply.

Other / Too many pets, too much mess: 8	Other / Set more stringent rules (size, number, breed, etc.) : 6	Other / Exempt service animals from deposit: 1
<p>A lot of them let their dogs roam free and poop all over every one's yards. Gross. They sometimes attack and are aggressive when residents walk by. They dogs are not tied up.</p> <p>There should be charges applied to pet owners that allow their animals to defecate on or around other tenant apartments and not clean up after them.</p> <p>the only problem I see with pets ... are other renters who let their animals leave feces all over the apartment complexes very unsanitary</p> <p>they need to clean up after their animals and not just let them free range cuz we have children that wants to play in the grass but is not able to do to all the feces that's everywhere</p>	<p>LARGE PETS & MORE THAN 2 SHOULD NOT BE ALLOWED! ESPECIALLY PIT BULLS!</p> <p>Their people who have pets and dog off leech, let their pets run free their should also be a fee Everytime their dog is unattended</p> <p>They need to charge a fee if owners don't pick up after their pet's mess.</p> <p>There needs to be a cap of weight and breed of dogs allowed. Also, for those that have a so called " service dog" needs to be really checked. A lot of people are going on line and getting their "not really service dogs" a service license.</p> <p>Animals should not live inside a residential dwelling pets are like children, limiting the number is best.</p>	<p>Service assistant animals should not be charged a deposit at all</p>



INSPECTION ACCESS (ACOP): 3.66 AVG

14

Changes to this policy include the following: If maintenance staff are unable to access the unit at the scheduled inspection time due to actions by the resident, the resident may be charged a fee. If children are in the unit at the time of a non-emergency inspection, at least one adult over the age of 18 must also be present.

Support: 0	Oppose: 8	Other: 1
	<p>Don't charge us for having an emergency come up on an inspection and we can't be present</p> <p>Due to the inspections there are times when we are not feeling good and are unable to let them in and I would call the office to reschedule the inspection .</p> <p>I do not think we should be charged. I have been robbed by the maintenance so I must be there.</p> <p>I don't know why you would charge a resident a fee your inspector people just literally walk in and out. ... residents take a day off of work for a inspector to come for less then five minutes.</p> <p>I strongly oppose the proposed fee related to inspections. First there is only a date that is given not a time therefore I would not and should not be held liable if for example the maintenance staff and inspector makes an attempt when I am in the shower. I am not going to answer the door. I would understand a fine if an appointment with a more reasonable window of time was scheduled on a 2nd attempt and I failed to make the unit inaccessible for maintenance or the inspector.</p>	<p>...I see no change to something that you already do</p>

QUESTIONS?



STAFF RESPONSES TO PUBLIC COMMENT

General Process Notes

- This survey was designed and administered from April 9 to May 2, 2020, in lieu of the in-person public comment typically sought during the MTW Plan adoption process.
- Links to English and Spanish versions of the survey were sent to 8974 e-mail addresses. SAHA received 893 responses (English: 884; Spanish: 9), 74.0% from HCV participants, and 24.3% from public housing residents. VASH and other clients made up the balance.
- All respondents were asked the same questions. That is, both PH and HCV clients responded to both ACOP and Admin Plan questions, as well as Strategic Plan and MTW Plan questions.
- The survey was anonymous, but respondents were given the option of providing contact information if they wanted staff to follow up with them directly. In some cases, respondents made specific requests or described specific challenges in their comments, and staff has already reached out to them individually.

STRATEGIC PLAN

COMMENT 1: [Strategic Plan, Six Outcomes] *Two related comments:* 1. Given all the harassment of tenants by SAHA staff, there should be a goal about improving those relationships. Also, SAHA would benefit from a goal that centers maintaining the human dignity of their tenants. / 2. Please enforce that us residents are being treated with respect. There is a certain energy that we are NOT as respected and looked down upon because we are not as fortunate as the staffs. I've seen views on both ends as a current section 8 resident and as a former social work major.

RESPONSE 1: Both of these comments request new strategic goals related to improving staff / client relationships. SAHA places a high priority on client satisfaction and is pursuing improvements on a number of fronts. On the one hand, the agency is exploring exactly these ideas of respect and human dignity through a parallel process to develop agency values. "Respect" has surfaced as one of the potential key agency values. "Respect" is also key to one of the proposed 2025 Outcomes: "SAHA Staff respect and value diversity and inclusion". This outcome is focused on staff interactions with clients, as well as staff interaction with other staff. Finally, the agency is committed to continuing to administer customer satisfaction surveys on a regular basis in order to identify areas of improvement.

COMMENT 2: [Strategic Plan, Six Outcomes] Would SAHA make current residents move to these units or are they for new residents? Also my concern is the location of the units.

RESPONSE 2: This comment appears to be a response to the proposed 2025 Outcome, "A supply of affordable quality units exists in sufficient quantities for SAHA Clients". SAHA would not make current residents move to new units added to the supply of affordable quality units. At the same time, new supply would not be reserved exclusively for new residents. The goal of increasing supply is to increase the quantity and quality of options available to both new and existing residents. SAHA agrees with the commenter that the location of new units is a critical variable in achieving that goal.



COMMENT 3: [Strategic Plan, Six Outcomes] Not clear on SAHAs impact on utilities (#3), as a participant for many years I am not familiar with this.

RESPONSE 3: This comment refers to the 2025 Outcome, “SAHA Clients have access to sufficient / affordable utilities”. SAHA does not have a direct impact on availability and affordability of utilities, and even less so with HCV participants. However, over the past year it has been increasingly clear that utilities are a primary source of concern for residents and participants, and that utility costs are often the second or third highest household budget item. SAHA is working on a number of initiatives to help address those concerns, including better energy efficiency and partnerships with SAWS and CPS. Additionally, as more utility conversations start to include access to broadband internet, SAHA is engaging partners to bridge the digital divide by providing greater connectivity, as well as access to machines and to training.

COMMENT 4: [Strategic Plan, Six Outcomes] Also does #1 include funds for the HCV program? If not should that not be addressed?

RESPONSE 4: This comment refers to the 2025 Outcome, “A supply of affordable quality units exists in sufficient quantities for SAHA Clients”. This outcome (like all the other 2025 Outcomes) would be achieved as a result of the efforts of all SAHA programs, including HCV. As the largest SAHA program, housing choice vouchers make up the largest number and proportion of the existing supply of affordable units. Funding for specific programs or initiatives will be determined in the future, both at the national level by Congress and HUD, and at the local level by the Board during the annual budget process.

COMMENT 5: [Strategic Plan, Six Outcomes] What does #5&6 mean?

RESPONSE 5: This comment refers to the 2025 Outcomes: “SAHA Staff respect and value diversity and inclusion”, and “SAHA staff thrive in career and professional work”. These two outcomes are staff-oriented, in contrast to the other four client-oriented outcomes. The first outcome seeks to define inclusion and respect for diversity as standard staff behavior. The second one describes an agency where staff engage in fulfilling and energizing work. For each outcome, detailed metrics and implementation strategies are being developed for future discussion.

This survey was sent out only to SAHA clients, and several comments were made questioning why clients would have something to say about staff outcomes. In fact, clients typically have a lot to say about their interactions with staff. One of the goals of this survey was to provide clients an opportunity to weigh in on the staff-oriented outcome language.

MTW PLAN



COMMENT 1: [MTW Plan, Next Step Housing Program (THRU Project)] As far as the Foster Kids aging out, it is a wonderful program but \$100? With how much apartment cost to rent, they can only end up in a bad area. That is setting them up for failure.

RESPONSE 1: Multiple comments were received making this point. The MTW Plan language related to this proposed activity will be amended to clarify that the \$100 cap is an upper limit on the amount of rent the client will pay. This ensures that the client, who has just aged out of the foster program and may have limited resources, does not spend more than \$100 on rent, regardless of the total amount of the contract rent.

COMMENT 2: [MTW Plan, Modified Project Based Vouchers] Staff received a question during the Board Meeting seeking to better understand the intent of the proposed changes.

RESPONSE 2: The proposed changes to the MPBV activity [allowing the agency to determine, on a contract-by-contract basis, whether to use Metropolitan Area Fair Market Rents (MAFMR) or Small Area Fair Market Rents (SAFMR)] are intended to make it easier to finance projects in expensive areas. The ability to choose the higher of MAFMR or SAFMR will increase development leverage and ultimately increase not only the number of affordable units produced, but also expand the range of neighborhoods with affordable units.

ACOP

COMMENT 1: [ACOP, Unit Access for Inspections] Eight comments were received in opposition to the proposal to assess a fee to the resident if maintenance staff are unable to access the unit at the scheduled inspection time due to actions by the resident.

RESPONSE 1: This ACOP change is specific to public housing and focused on pest control services. The goals of the policy include ensuring the safety of the SAHA residents, the safety of the pest control service providers, and the success of the pest control treatment. SAHA contracts with a third party pest control service that provides staff with a date and estimated time of service. The staff will then give the resident notice of the service schedule with information on how to prepare the unit. The resident does not have to be home for the service. However, a certain number of conditions need to be in place in order for the pest control service to be successfully completed. If any one of these conditions is not met, the vendor will not be able to perform the pest control service, but will charge SAHA for the trip:

- the unit is not prepared as outlined
- there is a minor in the unit without an adult
- there has been an unauthorized change of locks
- there is an unsecured animal in the unit

The missed inspection fee is the actual cost of the trip charge assessed by the pest control service provider.



COMMENT 2: [ACOP, Pet Rule changes] Service assistant animals should not be charged a deposit at all

RESPONSE 2: Service animals are not considered pets and will not be assessed a pet deposit. However, residents must provide supporting documentation of the need for a service animal.

COMMENT 3: [ACOP, Pet Rules] *Ten comments were received in support of, and eleven comments were received in opposition to, the proposed policy changes. Most of the comments in opposition did not want any pet fee to be charged at all.*

RESPONSE 3: SAHA policies related to pet ownership seek to strike a balance between positive and negative impacts, especially when negative impacts (such as noise or lack of cleanliness) are imposed on neighbors. Furthermore, the proposed changes cap the amount of unauthorized pet fees that may be assessed and allow any fees collected to be applied to a pet deposit. This helps further SAHA's efforts to promote responsible pet ownership while limiting undue financial burdens from punitive fees.

COMMENT 4: [ACOP, Pet Rules] *Eight comments were received requesting that SAHA enforce existing rules related to pets and address specific abuses, such as harboring hidden, unauthorized pets; violating leash requirements; and owning unauthorized breeds.*

RESPONSE 4: SAHA's policy and lease with the tenant establish clear guidelines for ownership of pets. Residents who have been approved to have a pet must enter into a pet agreement, which specifies that any noncompliance with SAHA's pet policy and applicable house rules may result in withdrawal of SAHA approval of the pet or termination of the tenancy. Such pet rules cover the following topics:

- Pet Type / Breed Restrictions;
- Number of Pets;
- Pet Area Restrictions;
- Cleanliness; and
- Pet Care

COMMENT 5: [ACOP, Pet Rules] *Eight comments were received describing properties with "too many pets" and/or "too much mess" due to pets. Some commenters requested that SAHA issue fines on pet owners who do not clean up after their animals.*

RESPONSE 5: SAHA's lease states that the pet owner must be responsible for the removal of waste and must take adequate precautions to eliminate any pet odors within or around the unit. SAHA will charge a \$10.00 fee for pet waste removal per incident, up to a total of \$50.00 per month.

COMMENT 6: [ACOP, Pet Rules] *Six comments were received requesting that SAHA adopt more stringent pet-control policies, including restrictions on breeds, size of animal, and verification of need for service animal.*



RESPONSE 6: Currently, SAHA restricts types of breeds and sizes of pets at our Public Housing communities. However, SAHA is unable to restrict breeds and sizes for service animals in accordance with the Fair Housing Act. SAHA requires all clients to provide verification of a service animal.

ADMIN PLAN

COMMENT 1: [Admin Plan, Reasonable Accommodation] *Three comments were received requesting that SAHA debar landlords who violate reasonable accommodation or other rules.*

RESPONSE 1: SAHA must adhere to all HUD regulations to include banning landlords. If SAHA is made aware of possible violations and investigation may be conducted. Depending on the results of the investigation, SAHA may elect to no longer do business with a landlord. SAHA is adding language to SAHA's landlord debarment policy to clarify that violation of reasonable accommodation may result in disapproval of future tenancy requests.

COMMENT 2: [Admin Plan, Criminal History] *Eight comments were received in support of, and ten in opposition to, the proposed changes. Supportive comments largely voiced the idea that everyone deserves a second chance. Opposing comments mostly wanted to see a zero-tolerance approach.*

RESPONSE 2:

The proposed policy changes recognize that individuals deserve second chances, but also acknowledge that clients value a sense of safety and security in their communities. The proposed policy changes are based on guidance to ensure that admissions policies:

- avoid blanket prohibitions
- are not based solely on arrests
- distinguish risk along a range of criminal conduct, including nature, severity, and recency / amount of time elapsed
- use individualized assessment of mitigating information

The proposed policy changes make adjustments to eligibility procedures. They do not change lease enforcement policies nor any other procedures related to how SAHA responds to criminal behavior in SAHA communities. The agency continues to be committed to ensuring that all SAHA clients feel safe and secure in their units and in their communities.



DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB

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

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: San Antonio Housing Authority (TX006) 818 S. Flores St. San Antonio, TX 78204 Congressional District, if known:	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing and Urban Development Office of Public and Indian Housing	7. Federal Program Name/Description: Moving to Work (MTW) Demonstration Program CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i> Not applicable	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Not applicable	
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 this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information 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.	DocuSigned by: Signature: <u>David Nisivoccia</u> Print Name: <u>David Nisivoccia</u> Title: <u>President and CEO</u> Telephone No.: <u>(210) 477-6047</u> Date: <u>3/11/2020</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

**Certification of Payments
to Influence Federal Transactions**

**Department of Housing
and Urban Development**
Office of Public and Indian Housing

Applicant Name

San Antonio Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work (MTW) Demonstration 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

David Nisivoccia

Title

President and CEO

Signature

Date (mm/dd/yyyy)

DocuSigned by:

David Nisivoccia

3/11/2020

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Previous edition is obsolete

APPENDIX C: PROPOSED PROGRAM IMPLEMENTATION POLICY CHANGES

Appendix C contains proposed changes to the Agency's implementation policies for the Public Housing Program and Assisted Housing Programs. Any substantial changes to implementation policies are subject to board approval. References to the Agency's current implementation policies as approved by the Board of Commissioners are provided.

Change Key:

Indicates policy has been added

Indicates policy has been removed

PROPOSED ACOP CHANGES

Below is a summary of proposed revisions to the FY 2020-21 ACOP. The current policy can be found here: [FY 2019-2020 Admissions & Continued Occupancy \(ACOP\)](#)

Change #1

Reason for the Change to 8.1.E:

This section adds language to clarify specific situations in which the SAHA Grievance Procedure applies to disputes of charges and fees under the Public Housing Lease. This section also adds language stating that during the pendency of the grievance process, no action may be taken to collect on the disputed debt. This language reflects current procedure that pauses debt collection while a family is in the informal hearing process, which enables the family to dispute charges without taking on additional financial burdens or risking immediate termination.

8.1.E SECURITY DEPOSITS [24 CFR 966.4(b)(5)]

- (4) Subject to applicable laws, interest earned on security deposits may be refunded to the tenant after vacating the unit, or used for tenant services or activities.

(f) SAHA will provide the resident with a written statement, which lists of any all charges made against the security deposit and any amounts still owed, applicable, within ten (10) business days of the move-out inspection. The notice statement will be sent to the resident's last known address in accordance with adverse action requirements under the SAHA Grievance Procedure. If the resident disagrees with the amount charged, ~~SAHA will provide a meeting to discuss the charges~~ the resident may dispute the charges through the grievance process.

(g) If the family requests a grievance hearing within the required timeframe, SAHA may not take action for nonpayment of the charges against the security deposit until the conclusion of the grievance process.



Change #2

Reason for the Changes to 8.1.F (2):

This section adds language to clarify specific situations in which the SAHA Grievance Procedure applies to disputes of charges and fees under the Public Housing Lease. This section also adds language stating that during the pendency of the grievance process, no action may be taken to collect on the disputed debt. This language reflects current procedure that pauses debt collection while a family is in the informal hearing process, which enables the family to dispute charges without taking on additional financial burdens or risking continued eligibility.

8.1.F PAYMENTS UNDER THE LEASE

(2) Late Fees and Nonpayment

(c) The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under SAHA grievance procedures. SAHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

- (i) If the family fails to pay their rent by the fifth (5th) business day of the month, and SAHA has not agreed to ~~accept payment at a later date~~ an alternative payment schedule or other repayment arrangements, a 14-day Notice to Vacate will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.
- (ii) In addition, a late fee ~~of \$15.00~~ in the amount of ten (10) percent of the month's Tenant Rent, as specified in the lease, will be charged after the fifth (5th) business day of the month if the resident fails to pay account in full. The minimum late fee charge is \$1.00 and the maximum late fee charge is \$30.00. Each late fee charge will be rounded up to the nearest dollar.
- ~~(iii) Effective September 1, 2019, a late fee of \$30.00 will be charged after the fifth (5th) business day of the month, with \$20.00 charged after the fifteenth (15th) calendar day if the resident fails to pay the account in full. The total amount of combined late fees is not to exceed \$50.00.~~
- (iii) If a family's tenant rent and corresponding late fee amount changes, SAHA will notify the family of the new amount and the effective date by sending notice of the rent adjustment. This notice will include the new late fee amount and become an addendum to the family's lease.
- (iv) When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a Non-Sufficient Funds (NSF) fee of \$25.00 will be charged to the family. The fee will be due and payable 14 days after billing.



- (v) ~~Four (4) late payments within a 12-month period will be considered repeated late payments and a serious lease violation, which is grounds for lease termination.~~
- (vi) ~~The Property Manager must~~ If the resident receives fixed government benefits on a date outside of the grace period when rent is due, SAHA will take the date the resident's income is actually received into account in making a determination of late payment. For example, if the resident relies on disability benefits ~~government payments~~ as a sole source of income, SAHA will provide an alternative payment schedule to allow the resident to pay rent on a date when benefits are received.
- (vi) Notices of late fee and/or NSF charges will be mailed monthly and will be in accordance with adverse action requirements under the SAHA Grievance Procedure. Late fee and/or NSF charges are due and payable fourteen (14) calendar days after billing. If the family requests a grievance hearing within the required timeframe, SAHA may not take action for nonpayment of the charges until the conclusion of the grievance process.
- (vii) ~~Four (4) late payments within a 12-month period will be considered repeated late payments and a serious lease violation, which is grounds for lease termination.~~

Change #3

Reason for the Change to 8.2.B:

This section adds language to determine when move-out charges are due and payable to SAHA, and clarifies that move-out charges and charges against the deposit are specifically subject to the SAHA Grievance Procedure. This section also clarifies that during a pending dispute under the Grievance Procedure, staff may not take actions to collect debt against the security deposit and also may not refer the debt to third-party debt collections agencies. This change bolsters the current procedure of pausing debt collection during the grievance process by adding submissions to third-party collectors. This change will be detailed further in the SAHA Grievance Procedure and will help ensure that federally-required resident rights are observed throughout the move-out and debt dispute process.

8.2.B TYPES OF INSPECTIONS

(2) Move-Out Inspections [24 CFR 966.4(i)]

- (b) The difference between the condition of the unit at move-in and move-out establishes the basis for any charges against the security deposit so long as the work needed exceeds that for normal wear and tear.



- (i) When applicable, SAHA will provide the tenant with a statement of charges to be made for maintenance and damage beyond normal wear and tear within ten (10) business days of the move-out.
- (ii) The statement of move-out charges will be mailed to the new address provided by the resident, if applicable, and will be in accordance with adverse action requirements under the SAHA Grievance Procedure. Charges are due and payable fourteen (14) calendar days after billing. If the family requests a grievance hearing within the required timeframe, SAHA may not take action for nonpayment of the charges until the conclusion of the grievance process.
- ~~(eiii)~~ Within thirty (30) days of move-out, SAHA will refund to the resident the amount of the security deposit, less any amount needed to pay the cost of unpaid rent, damages listed on the move-out inspection report that exceed normal wear and tear, and other charges due under the lease.
- ~~(fiy)~~ SAHA will provide the resident with a written statement, which lists of anyall charges made against the security deposit and any amounts stowed, if applicable, within ten (10) business days of the move-out inspection. The ~~notice~~statement will be sent to the resident's last known address in accordance with adverse action requirements under the SAHA Grievance Procedure. If the resident disagrees with the amount charged, ~~SAHA will provide a meeting to discuss the charges~~ the resident may dispute the charges through the grievance process.
- (v) If the family requests a grievance hearing within the required timeframe SAHA may not take action, such as sending the account to a third-party collections agency, until the conclusion of the grievance process.

Change #4

Reason for the Changes to 8.2.C (2), 8.2.C (3) and 8.2.D (1)(b):

These sections add language that clarify when and how a resident may be charged for failing to permit access to their unit for an inspection or maintenance. This section also clarifies that during an inspection or repair by maintenance staff, children in the unit must be accompanied by an adult. These provisions represent current practice among property staff, and further define the appropriate application of the maintenance “no-show” fee included in the Lease. No-show fees are not currently defined within the Lease, but staff report that lack of access to units due to resident behavior regularly causes costly delays. These changes provide additional safeguards for the protection of children and staff during unit entry and also may help to limit the negative effects associated with delayed inspections and/or repairs.



8.2.C NOTICE AND SCHEDULING OF INSPECTIONS

(2) Scheduling of Inspections

(d) If maintenance staff are unable to access the unit during the scheduled inspection time due to the resident, the resident may be charged in accordance with the fee schedule in the lease. Failure to permit access to the unit to perform an inspection or maintenance represents a violation of the lease.

(3) Attendance at Inspections

(a) Residents are required to be present for move-in inspections [24 CFR 966.4(i)]. There is no such requirement for other types of inspections.

(iii) If children are present within the unit at the time of the non-emergency inspection at least one (1) adult over the age of 18 must also be present.

8.2.D INSPECTION RESULTS

(1) SAHA is obligated to maintain dwelling units and the project in decent, safe and sanitary conditions and to make necessary repairs to dwelling units [24 CFR 966.4(e)].

(b) *Non-emergency Repairs*

(ii) The family must allow SAHA access to the unit to make repairs. If maintenance staff are unable to access the unit during the scheduled inspection time due to the resident, the resident may be charged in accordance with the fee schedule in the lease. Failure to permit access to the unit to perform an inspection or maintenance represents a violation of the lease.

Change #5

Reason for the Change to 10.2.D (9):

This section changes how unauthorized pet fees are assessed and upon pet registration, allows any fees collected to be applied toward the pet deposit. This change also caps the amount of unauthorized pet fees that may be assessed and adds required language to notify residents of their options for pet ownership. These changes were approved by the Board of Commissioners on February 6, 2020 following a public comment period, and will be reflected in the Lease on March 1,



2020. This section conforms the ACOP with the Lease and will help further SAHA's efforts to promote responsible pet ownership while limiting undue financial burdens from punitive fees.

10.2.D PET RULES

(9) Pets Rule Violations

- (a) All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement.
- (b) If a determination is made on objective facts supported by written statements that a resident/pet owner has violated the pet rules, a one-time, 24-hour written notice will be served and the resident will be given a \$10.00-/per-day charge up to a total of \$200.00 until the unauthorized pet is removed from the unit or is registered and approved per the lease. Any additional unapproved pet(s) result in a charge of up to \$10.00 per month.
- (c) Any charges collected for an unauthorized pet will be applied to the \$200.00 pet deposit upon SAHA's approval of the pet agreement.
- (ed) The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state:
 - (i) That the pet owner has ten (10) business days from the effective date of the service of notice to correct the violation or make written request for an informal conference to discuss the violation.
 - (ii) That the pet owner is entitled to be accompanied by another person of his or her choice at the informal conference.
 - (iii) That the pet owner's failure to correct the violation, request an informal conference, or appear at a requested meeting may result in initiation of procedures to remove the pet or to terminate the pet owner's tenancy.
- (iv) That SAHA encourages responsible pet ownership by assisting the owner with the pet registration process.
- (v) That any charges collected for an unauthorized pet will be applied to the \$200.00 pet deposit upon approval by SAHA.

Change #6

Reason for the Change to 10.3.C (2):

This section adds a cap to the amount of pet waste removal fees that may be collected and clarifies the actions that may be taken against the resident for repeated pet waste removal. These changes were approved by the Board of Commissioners on February 6, 2020 following a public comment period, and will be reflected in the Lease on March 1, 2020. Including these changes in the ACOP will help to ensure that residents are not charged excessively for failing to pick up after their pets, but will also ensure that residents are held accountable for multiple incidents of pet rule violations. By including a reference to specific adverse actions, this section also clarifies that pet-related charges



and violations are subject to the SAHA Grievance Procedure, as noted in 10.2.d (10) and in the terminations provisions in Chapter 13.

10.3.C OTHER CHARGES

(2) Pet Waste Removal Charge

- (a) The regulations do not address SAHA's ability to impose charges for house pet rule violations. However, charges for violation of SAHA pet rules may be treated like charges for other violations of the lease and PHA tenancy rules.

- (i) SAHA will charge a \$10.00 fee for pet waste removal per incident, up to a total of \$50.00 per month.
- (ii) Repeated incidents of pet rule violations and/or unpaid charges related to pets may result in the withdrawal of SAHA's approval of the pet and may be grounds for initiating termination procedures in accordance with Chapter 10.3.C.

Change #7

Reason for the Change to 14.3.D:

This section adds language on the informal settlement process permitted under federal law to allow for the development of "informal conferences" within the SAHA Grievance Procedure. These changes will provide for a new pre-hearing method for residents to resolve disputes and will be outlined further within the SAHA Grievance Procedure included in the Public Housing Lease. Introducing the informal conference procedures will allow for faster, more streamlined resolutions directly between residents and staff in their communities.

14.3.D INFORMAL SETTLEMENT OF GRIEVANCE [24 CFR 966.54]

- (1) HUD regulations state that any grievance must be personally presented, either orally or in writing, to the SAHA office or to the office of the housing development in which the complainant resides so that the grievance may be discussed informally and settled without a hearing.

- (a) SAHA will accept requests for an informal settlement of a grievance (referred to as "informal conference") either orally or in writing, to the property office within ten (10) business days of the grievable event. Within ten (10) business days of receipt of the request SAHA will arrange a meeting with the tenant at a mutually agreeable time and confirm such meeting in writing to the tenant.
- (b) If a tenant fails to attend ~~the~~ scheduled meeting for an informal conference without prior notice, SAHA will reschedule the ~~appointment meeting~~ only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.
- (c) "Good cause" is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.



(d) Informal conferences will be conducted in accordance with the provisions under the SAHA Grievance Procedure.

PROPOSED ADMIN PLAN CHANGES

Below is a summary of proposed revisions to the FY 2020-21 Administrative Plan. The current policy can be found here: [FY 2019-2020 Administrative Plan \(ADMIN PLAN\)](#)

Change #1

Reason for the Change to Exhibit 2-2: Reasonable Accommodation Policy and Procedures

Additional language was added to clarify the landlord’s role in the reasonable accommodation process. Owners and landlords participating in SAHA’s voucher programs are expected to comply with Fair Housing and ADA laws surrounding reasonable accommodations.

Overview

- (3) Landlord Requirements**
 - (a) The owner / landlord is required to abide by laws set forth in The Fair Housing Act and The Americans with Disabilities Act (ADA).
 - (b) If the owner / landlord does not abide by The Fair Housing Act and ADA, SAHA may take action, including but not limited to the following:
 - (i) Denial of Request for Tenancy Approval;
 - (ii) Abatement or suspension of Housing Assistance Payments;
 - (iii) Termination of the Housing Assistance Payment Contract; or
 - (iv) Debarment of the owner / landlord from program participation.

Change #2

Reason for the Change to 4.3.C(2)(f) Waiting List Preferences

SAHA was awarded an additional 59 vouchers to be used for the Mainstream Program. Also, this program previously allocated only 79 vouchers to be used based on referral from partnering social service agencies, but the program has been updated to allow *all* Mainstream vouchers to be used based on referral.

4.3.C SELECTION METHOD

- (2) **Local Preferences [24 CFR 982.207; HCV p. 4-16]**

(f) Waiting List Preferences

SAHA’S waiting list preferences are defined below and shall be assigned points as indicated. SAHA 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.

- (iv) **5-Year Mainstream Participants (75 Points)** – ~~238 applicant families~~ ~~The first 100 applicants~~ on the tenant-based voucher waiting list, who have a household member between the ages of 18 and 61 at least 18 years of age or older with a disability, ~~79 families with a non-elderly disabled Head of Household~~ will be certified and referred by a designated social service agency currently partnered with SAHA.



APPENDIX D: ASSET MANAGEMENT PLAN

Appendix D contains the Agency's Asset Management Plan.



ASSET MANAGEMENT PLAN

The Asset Management Plan outlines how the Agency plans to make best use of limited financial resources while embracing the goals and objectives of SAHA's Affordable Housing Preservation & Expansion Policy and supporting the Agency's 2025 Strategic Plan.

The Asset Management Plan generally covers the five-year period spanning from FY 2020-21 to FY 2020-25. In addition, to updating the five-year plan every year, the Agency also may make adjustments to respond to business needs.

To that end, the Agency 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 Agency's 2025 Strategic Plan.

Such activities will not be considered significant amendments to the MTW plan, provided the following internal protocols are followed:

1. Completion of analysis describing the cost and benefits of the contemplated action
2. Consultation with other agency 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 agency.

The Asset Management Plan encompasses preservation activities in the Low Income Public Housing and Beacon Communities housing portfolios as well as real estate development activity. The plan is organized as follows:

- 1. Housing Preservation: Capital Improvement Plans**
Details the Agency's plans to preserve affordable housing units through capital improvement plans for the Low Income Public Housing and Beacon Communities portfolios.
- 2. Housing Expansion: New Housing Development Plans**
Details the Agency's development plans for real estate assets currently or anticipated to be owned by the San Antonio Housing Authority or its affiliates.
- 3. Acquisitions: Asset Acquisition Plans**
Details the Agency's plans to acquire real estate assets to be owned by the San Antonio Housing Authority or its affiliates.
- 4. Dispositions: Asset Disposition Plans**
Details the Agency's plans to dispose of real estate assets currently owned by the San Antonio Housing Authority or its affiliates.
- 5. Other Real Estate Holding**
Provides a listing of the Agency's real estate assets that do not currently have development or acquisitions plans.



1. Housing Preservation: Capital Improvement Plans

Information below may change and all plans are subject to funding and separate Board approval.

A. Public Housing Five Year Capital Improvement Plan

Over the next five (5) years, the Agency plans to invest approximately \$22 million in capital repairs to extend the useful life at 32+ properties and approximately 2,653 housing units. Projected funding for capital improvements is based on historical grants and forecasted capital fund appropriations by HUD.

The table below outlines current property-specific preservation plans in addition to the five-year capital improvement plan (FY 2021 - FY 2025).

Fiscal Year (FY) ¹ Capital Fund Grant Year (CFP) ²	Property	Description	Units Preserved ³	Planned Investment (\$)
FY 2019-20 CFP19 (Current)	Cassiano	Building Foundation	499	200,000
	College Park	Elevator #2 - Cylinder Replacement	78	75,000
	Fair Avenue	Asbestos Consultant Services	216	152,065
	Highview	Storm Drainage	68	161,200
	L.C. Rutledge	Roof Replacement	66	905,637
	Madonna	Gas-Boiler System Assessment and Replacement	60	1,013,000
	Park View	Roofing, Exterior Panels	153	1,572,000
	San Pedro Arms	Elevator Modernization	16	90,000
	Villa Tranchese	Asbestos Consultant Services	201	152,065
	Victoria Plaza	Roof, Interior Upgrades, Sewer, Window Abatement	185	1,200,000
Total			1,542	5,520,967
FY 2020-21 CFP20	Cross Creek	Parking Lot Repairs	66	114,000
	Mirasol Homes	Roof Repairs/Replacement	174	1,209,800
	South San Apts.	Drainage Repairs	30	161,200
	Sun Park Lane	Elevator Modernization	65	90,000
	T.L. Shaley	Foundation Repairs	66	280,000
	Villa Veramendi	Roof Repairs/Replacement	166	950,000
	W.C. White	HVAC Replacement	75	225,000
Total			642	3,030,000

¹ SAHA fiscal years run from July 1 to June 30th. For example, FY2020 begins on July 1, 2019 and ends on June 30, 2020.

³ Number of housing units preserved is defined as number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non strategic assets and net loan proceeds from refinances (Beacon)). 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.

² Capital Fund Grants are awarded to SAHA every year. SAHA then allocates funds based on capital needs.



FY 2021-22	Francis Furey	Substantial renovation	66	2,500,000
CFP21	Le Chalet	Substantial renovation	34	1,275,000
	Morris Beldon	Substantial renovation	35	912,000
Total			157	3,530,000
FY 2022-23	College Park	Substantial renovation	78	800,000
CFP22	Kenwood North	Substantial renovation	53	930,000
	Olive Park	Substantial renovation	26	1,800,000
FY 2023-24	Midway	Substantial renovation	20	700,000
CFP23	Park Square	Substantial renovation	26	990,000
Total			46	1,690,000
FY 2024-25	Escondida	Substantial renovation	20	200,000
CFP24	Linda Lou	Substantial renovation	10	200,000
	Matt Garcia	Substantial renovation	55	650,000
	Pin Oak II	Substantial renovation	22	150,000
	Village East	Substantial renovation	24	1,400,000
Total			131	2,600,000
GRAND TOTAL			2,653 / 2,575⁴	\$21,057,967⁵

B. Energy Performance Contract (EPC):

An EPC is a HUD approved program, which allows a Public Housing Authority to finance energy and water conservation measures and capital improvements through future utility cost savings.

The San Antonio Housing Authority (SAHA) and its Board of Commissioners elected and approved the process to begin the pre-development phase of a U.S. Housing and Urban Development (HUD) approved EPC where SAHA will spend pre-development funds associated with technical assistance services including, but not limited to engineering, legal, consultants, and other services necessary to achieve project financing and HUD approval. Upon financial closing of the EPC transaction, HUD EPC regulations allow SAHA to be reimbursed for expenditures associated with pre-development services.

SAHA's EPC is estimated to generate about \$16.5 million of utility savings, over a fifteen year term, with a net present value of \$8.3 million in project funds, which will be sourced through an anticipated tax exempt municipal lease purchase agreement. The soft and hard costs associated with installing energy conservation measures (ECM) will be funded by bank debt which will be serviced by energy cost savings.

SAHA's EPC will include high efficient lighting, high efficient plumbing fixtures, solar panels, roofs, windows, HVAC plant upgrades, and bathroom exhaust fans across 34 public housing developments (various building types) equating to 2,324 dwelling units. The approximate time for completion is one year.

C. Beacon Communities Five Year Capital Improvement Plan

⁴ College Park (78 units) is expected to undergo capital improvements over multiple fiscal years. The first figure includes each capital improvement to these units and the second figure includes unique units preserved over the entire plan.

⁵ Funding sources may be a combination of CFP, MTW, sale net proceeds and insurance proceeds.



In the coming years, the Agency plans to invest approximately \$28 million in capital repairs to extend the useful life at 21 properties and approximately 2,654 units in the Beacon Communities portfolio. In addition, this portfolio will be expanded as properties in the Agency's Partnership portfolio come to the end of their 15-year affordability period and transition ownership to SAHA. As a result of these property transitions, the capital plan is expected to change to include these new properties.

Projected funding for capital improvements in the Beacon Communities portfolio is based on operating funds, new or refinanced debt on the property, or insurance proceeds where applicable. The tables below outline current property-specific preservation plans.

Fiscal Year ⁶	Property	Description	Units Preserved ⁷	Planned Investment	
FY 2018-19	Castle Point	Comprehensive modernization	220	\$ 4,800,000	
	Monterrey Park	Roof, Exterior Repairs, Parking Lot Repairs	200	3,000,000	
	Pecan Hill	Plumbing, Site Drainage, Trees, HVAC	100	1,050,000	
	Sunshine Plaza	Substantial Renovations (Elevators/Roofs/Windows/HVAC)	100	2,500,000	
	Villa de Valencia	HVAC Replacement	104	500,000	
	Woodhill	Building 23 & 24, Parking Lot Repairs	532	1,200,000	
	Total			1,256	\$13,050,000
FY 2019-20	Burning Tree	PNA Priorities	108	2,000,000	
	Churchill Estates	PNA Priorities, Privacy Fence, Repair Parking Lot/Drive	40	1,800,000	
	Cottage Creek I & II	Parking Lots, Sidewalk Repairs	253/196	100,000	
	Courtland Heights	Site Work, Landscape, Covered Parking, Pool Deck	56	150,000	
	Encanta Villa	PNA Priorities	56	1,300,000	
	La Providencia	Substantial Renovations (Plumbing/Exterior/Parking/Roof/HVAC)	90	2,000,000	
	Reagan West	Roof Repairs/Replacement, Driveways	15	100,000	
	Villa de Valencia	Roof Repairs/Replacement	104	500,000	
	Total			918	\$7,950,000
	FY 2020-21	Cottage Creek I	Update Fencing	253	60,000
Homestead		Site Drainage, Retaining Walls	157	2,200,000	
Towering Oaks		Restripe Parking Lot; Refi Various	128	1,010,000	
Warren House		Repair Raised Bed	7	10,000	

⁶ SAHA fiscal years run from July 1 to June 30th. For example, FY2020 begins on July 1, 2019 and ends on June 30, 2020.

⁷ Number of housing units preserved is defined as number of housing units impacted by contract execution of funds that include (CFP, MTW, Operations, Insurance loss proceeds, replacement reserve funds, net proceeds from sale of non strategic assets and net loan proceeds from refinances (Beacon)). 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.



Total			545	\$3,280,000
FY 2021-22	Bella Claire	Plumbing, Fence, Parking Lots; Refi Various	67	1,300,000
	Homestead	Roof Repairs/Replacement	157	800,000
	Villa de San Alfonso	Paint Trim, Parking Lot Repairs	29	100,000
Total			253	\$2,200,00
FY 2022-23	Claremont	Roof Repairs/Replacement	4	50,000
FY 2023-34	Converse Ranch	Paving; Refi Various	192	2,030,000
GRAND TOTAL			3,168 / 2,654⁸	\$ 28,560,000

⁸ Cottage Creek (253 units), Homestead (157 units), and Villa de Valencia (104) are expected to undergo capital improvements over multiple fiscal years. The first figure includes each capital improvement to these units and the second figure includes unique units preserved over the entire plan.



2. Housing Expansion: New Housing Development Plans

The Agency has a number of projects in the development pipeline. The development pipeline includes three main phases: early planning, pre-development, and new construction. Projects outlined below are presented by their current development phase beginning with new construction and working backward to projects in the early planning stage. Information may change and all plans are subject to funding and separate Board approval.

General Development Phases

- Early planning: Projects in this phase include projects that are in the very early stage of development planning. Detailed project information is limited and dynamic.
- Pre-Development: Projects in pre-development include those the Agency is engaged in the following activities:
 - Community engagement
 - Disposition/Demolition applications (if applicable)
 - 90 day relocation (if applicable)
 - Securing financing including Low Income Housing Tax Credit Application
 - Abatement and demolition (if applicable)
- New Construction: Projects in the construction phase have completed all pre-development activity and executed a real estate transaction authorizing construction.

NEW CONSTRUCTION

Projects in the construction phase have completed all pre-development activity and executed a real estate transaction authorizing construction.

By FY 2021-22, the Agency anticipates adding 509 rental units to its inventory -- 95% of units will be leased to families at or below 60% of the area median income. In addition, the Agency will contribute 25 single-family for-sale units to be sold to families at or below 120% of area median income. The Agency is allocating funding under its Moving to Work fungibility to provide gap financing to one of the three multi-family rental developments, Majestic Ranch.

Name	Total Units	Estimated Completion	Income Mix					Market
			30%	50%	60%	80%	120%	
Rental								
Artisan at Ruiz	102	12/2020 (FY 2021)	11	41	50	0	0	0
East Meadows II	119	5/2020 (FY 2020)	24	24	47	0	0	24
Majestic Ranch*	288	11/2021 (FY 2022)	0	0	288	0	0	0
Total rental units	509		35	65	385	0	0	24
For-Sale								
Choice Infill Houses	25	12/2020 (FY 2021)	0	0	0	0	25	0
Total for-sale units	25		0	0	0	0	25	0

*MTW funded

Project Descriptions



Artisan at Ruiz

Developer: Franklin Development / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Artisan at Ruiz, a new 102-unit multifamily project, is located at 1507 Ruiz Street. The project is expected to cost approximately \$18,972,000.00 and will be a 9% tax credit project with all of the units leased to families at or below 60% of the area median income. As part of the Alazan Redevelopment Plan, this development is one of three developments within the west side community that will be utilized for relocation of Alazan Courts residents that wish to stay in the neighborhood.

East Meadows II

Developer: McCormack Baron Salazar / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

East Meadows II, a new 119-unit multifamily project, is located at 1323 N Walters Street. The project is expected to cost approximately \$25,848,336.00 and is a 9% tax credit project with 95 of the units leased to families at or below 60% of the area median income and 24 market units.

Majestic Ranch

Developer: Hogan Properties Company, Inc. dba Homespring Realty Partners / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Majestic Ranch Apartments, a new 288-unit multifamily project, is located at 4862 Callaghan Road and 118 Woodside Drive. The project is expected to cost approximately \$46,084,260.00 and will be a 4% tax credit project with all of the units leased to families at or below 60% of the area median income. This project received gap financing through the Agency's Moving to Work funding flexibility.

Choice Infill Houses

Developer: Terramark

SAHA committed 12 parcels in the Choice Neighborhood Target site area in FY2019 to Terramark; 7 parcels have been deeded to the developer in Phase I in exchange for the development of 12 affordable single-family houses that are for sale to families/individuals earning up to 120% of AMI with a 20 year affordability restriction. Due to strong interest from qualified buyers; Terramark is currently permitting an additional 6 homes on the original lots.

PRE-DEVELOPMENT

Projects in pre-development are in the final development planning phase and have not executed a real estate transaction.

By FY 2020-21, the Agency anticipates executing real estate transactions for the following projects. If all projects complete financial closing as planned, new construction is anticipated to be completed by FY 2021-22.

The Agency is anticipating allocating funding under its Moving to Work fungibility to provide gap financing to two of the projects, St. John's Square and 100 Labor -- allocations are subject to board approval and financial closing.



Name	Total Units	Estimated Completion	Anticipated Income Mix					Market
			30%	50%	60%	80%	120%	
Alazan Lofts*	88	12/2021 (FY 2022)	8	32	40	0	0	8
Culebra Crossing	326	8/2021 (FY 2022)	0	163	0	0	0	163
Kitty Hawk Flats	240	6/2022 (FY 2022)	24	0	216	0	0	0
Mira Vista Apartments	300	5/2022 (FY 2022)	0	0	300	0	0	0
Old Pearsall Flats	348	6/2022 (FY 2022)	0	0	348	0	0	0
St. John's Square**	252	1/2022 (FY 2022)	0	54	0	0	0	198
Tampico Apartments	200	10/2021 (FY 2022)	0	0	124	0	0	76
Trader Flats	324	6/2022 (FY 2022)	33	0	291	0	0	0
100 Labor**	213	4/2022 (FY 2022)	27	17	0	0	0	169
1604 Flats	324	6/2022 (FY 2022)	33	0	291	0	0	0
Total rental units	2,623		125	266	1,610	0	0	614

*40 units also have a PH subsidy

**50 units MTW funded; 4 tax credit

Project Descriptions

Alazan Lofts

Developer: NRP Group / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Alazan Lofts, an approximately 85-unit multifamily project, is located at 1102 El Paso Street. The project is expected to cost approximately \$17,618,112.00 and is funded with 9% tax credits. As part of the Alazan Redevelopment Plan, this development is one of three developments within the west side community that will be utilized for relocation of Alazan Courts residents that wish to stay in the neighborhood.

Culebra Crossing

Developer: Lynd Company / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Culebra Crossing, an approximately 326-unit multifamily project, is located at the intersection of Culebra Road and Loop 1604. The project is expected to cost approximately \$47,140,798 and is funded by the developer. Neither SAHA nor SAHFC will have any financial obligations with respect to the Project, except to obtain the property tax exemption.

Kitty Hawk Flats

Developer: NRP Group / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Kitty Hawk Flats, an approximately 240-unit multifamily project, is located at the north corner of Kitty Hawk and O'Connor Road. The project is expected to cost approximately \$39,318,536 and is funded with tax exempt bonds and 4% tax credits.

Mira Vista Apartments (aka 5700 Culebra)

Developer: Hogan Properties Company, Inc. dba Homespring Realty Partners / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Mira Vista Apartments, an approximately 300-unit multifamily project, is located at 5700 Culebra



Road. The project is expected to cost approximately \$43,454,716 and is funded with tax exempt bonds and 4% tax credits.

Old Pearsall Flats

Developer: Streamline / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Old Pearsall Flats, an approximately 348-unit multifamily project, is located at 9326 S.W. Loop 410. The project is expected to cost approximately \$55,703,673 and is funded with tax exempt bonds and 4% tax credits.

St. John's Square

Developer: Austin Fairchild Management/ Weal Development / Co-Developer: San Antonio Housing Authority's affiliated entity, Las Vargas Public Facility Corporation (LVPFC)

St. John's Square, an approximately 252-unit multifamily project, is located at 410 E. Nueva St. The project is expected to cost approximately \$71,847,459. This project is planned to receive gap financing through the Agency's Move to Work funding flexibility.

Tampico Apartments

Developer: Mission DG, LTD / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Tampico Apartments, an approximately 200-unit multifamily project, is located at 210 Tampico. The project is expected to cost approximately \$31,531,744.00 and is funded with tax exempt bonds and 4% tax credits. As part of the Alazan Redevelopment Plan, this development is one of three developments within the west side community that will be utilized for relocation of Alazan Courts residents that wish to stay in the neighborhood.

Trader Flats

Developer: NRP Group / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Traders Flats, an approximately 324-unit multifamily project, is located at 8671 S.W. Loop 410. The project is expected to cost approximately \$50,569,856 and is funded with tax exempt bonds and 4% tax credits.

100 Labor

Developer: Franklin Development / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

100 Labor, an approximately 213-unit multifamily project, is located at 100 Labor Street. The project is expected to cost approximately \$54,599,095. This project is planned to receive gap financing through the Agency's Moving to Work funding flexibility.

1604 Flats

Developer: NRP Group / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

1604 Lofts, an approximately 324-unit multifamily project, is located near the corner of I-10 East and 1604. The project is expected to cost approximately \$50,508,447 and is funded with tax exempt bonds and 4% tax credits.

LOW INCOME HOUSING TAX-CREDIT (LIHTC) APPLICATIONS



The Agency is in the process of or has submitted LIHTC applications for the following projects.

If projects receive tax-credits, they are anticipated to continue pre-development activities.

Name	Estimated Total Units	Tax Credit Application
Cinnamon Creek Lofts	85	9%
Fiesta Trails	85	9%
Horizon Point Apartments	330	4% and tax exempt bonds
Ramsey Road Residences	85	9%
Salado Cliffs	85	9%
Snowden Apartments	185	9%
Total rental units	855	

Project Descriptions

Cinnamon Creek Lofts

Developer: Cinnamon Creek Lofts Ltd., a subsidiary of NRP Lonestar

Development LLC / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Cinnamon Creek Lofts, an approximately 85-unit housing development, is located at 8830 Cinnamon Creek Drive. The development will be targeted specifically for working families and will consist of 85 tax credit units—10% of units will be reserved for those at 30 percent of the area median income and below, 40% of units reserved for those making 50 percent of area median income and below, and 50% of units reserved for those making 60 percent of area median income and below.

Fiesta Trails

Developer: Fiesta

Trails Ltd., a subsidiary of NRP Lonestar Development LLC / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Fiesta Trails, an approximately 85-unit housing development, is located at 12485 W. Interstate 10. The development will be targeted specifically for working families and will consist of 85 tax credit units—10% of units will be reserved for those at 30 percent of the area median income and below, 40% of units reserved for those making 50 percent of area median income and below, and 50% of units reserved for those making 60 percent of area median income and below.

Horizon Point Apartments

Developer: Developer: Streamline / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Horizon Point Apartments, an approximately 330-unit multifamily project, is located near Woodlake Parkway and I-10. The development will target families averaging 60% of the area median income (AMI), with 10% of the units at 30% AMI.

Ramsey Road Residences

Developer: Ramsey Road Residences Ltd., a subsidiary of NRP

Lonestar Development LLC / Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Ramsey Road Residences, an approximately 85-unit housing development, is located at 610 E.



Ramsey Road. The development will be targeted specifically for working families and will consist of 85 tax credit units—10% of units will be reserved for those at 30 percent of the area median income and below, 40% of units reserved for those making 50 percent of area median income and below, and 50% of units reserved for those making 60 percent of area median income and below.

Salado Cliffs

Developer: Salado Cliffs Ltd., a subsidiary of NRP Lonestar Development LLC / Co-Developer: San Antonio Housing Authority’s affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Salado Cliffs, an approximately 85-unit housing development, is located at 3330 Nacogdoches. The development will be for 55+ year old Seniors and will consist of 85 tax credit units—10% of units will be reserved for those at 30 percent of the area median income and below, 40% of units reserved for those making 50 percent of area median income and below, and 50% of units reserved for those making 60 percent of area median income and below.

Snowden Apartments

Developer: SAHA / Co-Developer: San Antonio Housing Authority’s affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Snowden Apartments, an approximately 185-unit housing development, is located at 7223 Snowden Road. The development will be targeted for families -- 100% affordable at 60% area median income or less. The Facility Corporation initially plans to self-develop the apartment complex, although a private developer might be considered in the future to provide guarantees and long-term management capability.

EARLY PLANNING

Projects in this phase are in the early planning stages.

Name	Location	Type
Alazan Courts - Phase I	Brazos St. to Colorado	Multi-Family / Rental
Alazan Courts - Phase II	Colorado to Alazan Creek	Multi-Family / Rental
Charity at Springview	210 Grimes	Multi-Family / Rental
Mirasol - Westside Reinvestment Initiative	Multiple	Single-Family / For Sale
St. Phillips College, College Homeless Program	TBD	Multi-Family / Rental
Victoria Commons - Townhomes (98 lots)	Multiple	Single-Family
Victoria Commons - Midrise Apartments	Refugio Street	Multi-Family / Rental
Victoria Commons - Old Admin Bldg	400 Labor	Multi-Family / Rental

Project Descriptions

Alazan Courts - Phase I

Developer: NRP Group / Co-Developer: Co-Developer: San Antonio Housing Authority’s affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)



As part of the Alazan Redevelopment Plan, Alazan Courts - Phase I, an approximately 324-unit multifamily development, is located on various lots on S. Colorado, Torreon, S. Brazos and West Cesar Chavez Streets.

Alazan Courts - Phase II

Developer: NRP Group / Co-Developer: Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

As part of the Alazan Redevelopment Plan, Alazan Courts - Phase II, an approximately 324-unit multifamily development, is located on various lots on S. Colorado near Alazan Creek.

Charity at Springview

Developer: Franklin Development / Co-Developer: Co-Developer: San Antonio Housing Authority's affiliated entity, the San Antonio Housing Facility Corporation (SAHFC)

Charity at Springview, an approximately 250-unit multifamily development, is located at the northeast quadrant of Hedges and Grimes St. The development will target families at 60% of the area median income.

Mirasol - Westside Reinvestment Initiative

Developer: TBD / Co-Developer: TBD

In 2016, HUD approved an Addendum to the HOPE VI Mirasol Homeownership Neighborhoods Grant initially developed in the late 1990's. This program includes four neighborhoods: Blueridge, Villas de Fortuna, Palm Lake, and Sunflower. Demolition and new construction of forty (40) homes in Blueridge and twenty-eight (28) in Villas de Fortuna have been completed. The remaining houses planned for rehabilitation in Palm Lake and Sun Flower have completed a physical assessment due to severe vandalism. The agency received a final report recommending demolition. SAHA will be submitting a formal request for a revision of the Addendum in order to obtain HUD approval to demolish the existing homes and construct new homes.

St. Phillips College, College Homeless Program

Developer: TBD / Co-Developer: TBD

This project is planned to be sited on SAHA owned raw acreage that will serve homeless college students attending St. Phillips College. (See Section 4 for more details on the proposed MTW Activity, FY2020-2: St. Phillips College, College Homeless Program (SPC-HP)

Victoria Commons - Build out of remaining development parcels

Master Developer: Catellus Development Corporation

Victoria Commons Townhomes Phase IIB will include the construction of at least 98 market rate townhomes on existing lots previously platted.

Victoria Commons - Midrise Apartments

Developer: TBD

Master Developer will determine viability of using one or both existing stormwater detention ponds as sites for new mixed-income multi-family housing.

Victoria Commons - Old Admin Bldg

Developer: TBD

Master Developer will determine the viability of renovating or replacing the existing admin building for residential or light commercial uses.



ALAZAN COURTS REDEVELOPMENT PLAN

The Agency has procured a developer to begin the master planning of the redevelopment of 501 public housing units at Alazan Courts. The plan is to demolish the Alazan buildings in two phases. In anticipation of the demolition, SAHA has begun construction on three developments within the west side community in order to utilize those units for relocation of residents that wish to stay in the neighborhood. These three sites are Artisan at Ruiz (102 multi-family units), Alazan Lofts (88 multi-family units) which is located directly adjacent to the Alazan courts and is due to break ground in June/July 2020, and Tampico Apartments (200 multi-family units) due to break ground September 2020. SAHA proposes utilizing MTW funds to cover relocation costs and will also be seeking Tenant Protection Vouchers (TPV) to assist with the relocation process.



3. Dispositions: Asset Disposition Plans

The Agency 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
Section 32 Program / HOPE VI - Springview Homes Disposition	452504	238 CORLISS
	462032	518 CORLISS
	115632	2806 DEL RIO
	452413	126 FERRIS
	453698	526 J ST
	453718	614 J ST
	115673	2858 WYOMING
Post Auction/RTC/Former Lease-Purchase Portfolio Disposition	314106	7250 GLEN MIST
	441311	1071 POINSETTIA ST
	115411	1411 MONTANA
Public Housing Scattered Site Disposition (see Section 2: Planned changes to PH housing stock for additional information)		69 PH Scattered Sites
Victoria Commons Build-out	98 Lots, potential multi-family sites,	Administrative Building

Plan Descriptions:

Section 32 Program / HOPE VI - Springview Homes Disposition

The Agency owns seven (7) properties under the Section 32 program. In September 2018, the Agency requested from HUD to rescind the Section 32 program for these homes. These properties were originally part of the HOPE VI Springview Grant. As part of the grant, the properties were designated for SAHA's Lease Purchase Homeownership Program. The homes were never purchased by a homeowner and the Lease Purchase Program ended in 2009 which coincidentally, was the beginning of the "housing foreclosure crisis" across the country. The homes have remained vacant for 10-20 years and have been severely vandalized. The level of repairs required to bring the homes up to code as required by Section 32 is currently not feasible for the Agency. It is also the desire of the neighborhood and overall community that the Agency dispose of these houses and provide an opportunity for others to acquire and rehabilitate them. These homes have become a nuisance to the community and unsustainable for the agency.

Because the original intent of the homes was to provide affordable housing to the community, the Agency will sell the houses with a Declaration of Restrictive Covenants that requires that the houses remain affordable for families and individuals earning up to 120% of area median income for 20 years. Due to current market conditions and the condition of the houses, it is important that we provide affordable housing to individuals that can be successful.

SAHA received approval from HUD on the rescission of the program and submitted an application for disposition of these houses in FY2020. Currently, SAHA is waiting on approval from HUD for disposition.



Post Auction/RTC/Former Lease-Purchase Portfolio Disposition

SAHA has reduced its single family homes/lots portfolio to two (2) vacant homes and one (1) lot. These properties remain from previous auction sales or were former Lease-Purchase Program properties. Staff expect to dispose of these in the coming plan year.

Public Housing Scattered Site Disposition

An application for the disposition of 69 scattered sites was approved by the Board in August 2019. SAHA plans to submit the disposition application to HUD in February-March 2020.

SAHA staff have conducted public meetings with impacted families outlining the project timeline, relocation benefits, and replacement housing options. Staff continue to assist clients in securing alternative housing options in the Public Housing Program or Section 8 Program. SAHA has secured updated appraisals and upon final approval by HUD, will market properties for sale via MLS as units vacate. Net sales proceeds after payment of transaction related costs will be invested in capital repair and/or replacement projects designed to preserve and extend the useful life of existing public housing assets.

Victoria Commons 98 Townhome lots & Administrative Building

SAHA will dispose of this property to the Master Developer in order to complete the Victoria Commons Townhomes described in the expansion plan.



4. Acquisitions: Asset Acquisition Plans

The Agency has no active acquisition plans, but did complete one unplanned acquisition in FY2020.

Arroyo Seco: This 200-unit multi-family community was acquired in FY2020. The development has 10% of the units reserved for families at 60% area median income and 40% of the units reserved for 80% of area median income. Prior to this acquisition, the development was 100% market rate.

5. Other Real Estate Holdings

Below is a list of real estate holdings that may be subject to future development or disposition.

Property IDs	PROPERTY ADDRESS
109402, 109403	550 Brooklyn
409213, 409067, 409083, 409198	3940 San Fernando
124452	1706 Cincinnati
115595	Springview 2603 Ezell
115597	Springview 2603 Ezell
115600	Springview 2607 Ezell
115602	Springview 2944 E. Commerce
115603	Springview Ezell (Easement Land)
115790	Springview 202 Garcia St.
115610	Springview Garcia St
115582	Springview 2407 Ezell
115583	Springview 2411 Ezell
115588	Springview 2902 E. Commerce
115589	Springview 2906 E. Commerce
115590	Springview 2910 E. Commerce
115807	Springview 651 S. Rio Grande
141735	509 Saltillo St
551676	1822 Arboleda St



APPENDIX E: 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 E is reserved for documentation associated with PIH 2017-24. Upon execution of leases executed after the release of PIH 2017-24, lease information will be listed here.

Generally, funds from third-party leases are used to offset operational costs in their respective property.



