



## EXECUTIVE SUMMARY

MEETING DATE: May 10, 2024

HCR24-042

SUBJECT: Fiscal Year 2025 Moving to Work Annual Plan Amendment Approval

COUNCIL DISTRICT: Citywide

ORIGINATING DEPARTMENT: Compliance and Equity Assurance

CONTACT/PHONE NUMBER: Debra Fischle-Faulk (619) 578-7411

REQUESTED ACTION:

Approve the Fiscal Year 2025 Moving to Work Annual Plan Amendment.

EXECUTIVE SUMMARY OF KEY FACTORS:

- The San Diego Housing Commission (Housing Commission) is one of only 39 original Moving to Work (MTW) agencies out of approximately 3,200 public housing authorities nationwide. The U.S. Department of Housing and Urban Development (HUD) has announced the addition of 100 MTW agencies.
- The MTW designation provides the Housing Commission the ability, subject to HUD's approval, to implement a variety of innovative new approaches to provide housing assistance and other services to low-income families within the City of San Diego.
- HUD requires MTW agencies to submit an annual plan, including all proposed activities and revisions to previously approved activities.
- The proposed Fiscal Year (FY) 2025 MTW Annual Plan was approved by the Housing Commission Board on February 16, 2024, and was submitted to HUD by April 15, 2024, for review.
- The activities in the Housing Commission's FY 2025 MTW Annual Plan Amendment are designed to increase housing opportunities for low-income families and use federal dollars more efficiently.
- The proposed FY 2025 MTW Annual Plan Amendment includes:
  - *Rental Assistance Rent Reasonableness* – The Housing Commission is requesting approval from HUD to update its Rental Assistance Rent Reasonableness Activity to include Project-Based Vouchers. Rent reasonableness ensures the contract rent for units rented by Housing Choice Voucher households are comparable to similar, market-rate units.
  - *Expedited Eligibility and Leasing Exceptions* – The Housing Commission is requesting approval from HUD on a new activity to expand exceptions to expedite the placement of low-income households (including seniors, people with disabilities, and families) and households experiencing homelessness into rental homes.
  - *Family Unification Program (FUP)/Foster Youth to Independence (FYI)*. The Housing Commission is requesting approval from HUD on a new activity to modify the Family Unification (FUP) Youth/Foster Youth to Independence (FYI) time period for verification of eligibility for subsidy extension. This modification will increase the number of youth eligible for program extensions, provide participating youth additional time to implement the criteria to meet extension requirements for rental assistance, increase self-sufficiency, and align with the Housing Commission's biennial recertification cycle (every two years).



## REPORT

**DATE ISSUED:** May 2, 2024

**REPORT NO:** HCR24-042

**ATTENTION:** Chair and Members of the San Diego Housing Commission  
For the Agenda of May 10, 2024

**SUBJECT:** Fiscal Year 2025 Moving to Work Annual Plan Amendment Approval

**COUNCIL DISTRICT:** Citywide

### **REQUESTED ACTION**

Approve the Fiscal Year 2025 Moving to Work Annual Plan Amendment.

### **STAFF RECOMMENDATION**

That the San Diego Housing Commission (Housing Commission) Board of Commissioners (Board) take the following actions:

- 1) Approve the Fiscal Year (FY) 2025 Moving to Work (MTW) Annual Plan Amendment.
- 2) Authorize the President & Chief Executive Officer, or designee, to execute all documents and instruments necessary and/or appropriate to implement these approvals, in a form approved by General Counsel, and to take such actions as are necessary and/or appropriate to implement these approvals, provided that a copy of the documents, signed as to form by General Counsel, is submitted to each Housing Commissioner.

### **SUMMARY**

The Housing Commission is one of only 39 original MTW agencies out of approximately 3,200 public housing authorities nationwide. The U.S. Department of Housing and Urban Development (HUD) has announced the addition of 100 MTW agencies. The MTW designation provides the Housing Commission the ability, subject to HUD's approval, to implement a variety of innovative new approaches to provide housing assistance and other services to low-income families within the City of San Diego. HUD requires MTW agencies to submit an annual plan including all proposed activities and revisions to previously approved activities. The proposed Fiscal Year 2025 MTW Annual Plan was approved by the Housing Commission Board on February 16, 2024, and was submitted to HUD by April 15 for review. Housing Commission staff developed the Fiscal Year 2025 MTW Annual Plan Amendment (Plan Amendment), which includes amendments to one MTW activity and the proposal of two new MTW activities. The activities in the Housing Commission's Plan Amendment are designed to increase housing opportunities for low-income families and use federal dollars more efficiently. The Plan Amendment provides a detailed description of the activities and specifies the methods for measuring performance. The attached Plan Amendment includes updates to one activity and two new activities the Housing Commission is requesting authority to implement in FY 2025.

The FY 2025 MTW initiatives included in the Plan Amendment are summarized as follows:

1. *Rental Assistance Rent Reasonableness* – The Housing Commission is requesting approval from HUD to update its Rental Assistance Rent Reasonableness Activity to include Project-Based Vouchers. Rent reasonableness ensures the contract rent for units rented by Housing Choice Voucher households are comparable to similar, market-rate units.
2. *Expedited Eligibility and Leasing Exceptions*. The Housing Commission is requesting approval from HUD on a new activity to expand exceptions to expedite the placement of low-income households (including seniors, people with disabilities, and families) and households experiencing homelessness into rental homes.
3. *Family Unification Program (FUP)/Foster Youth to Independence (FYI)*. The Housing Commission is requesting approval from HUD on a new activity to modify the Family Unification (FUP) Youth/Foster Youth to Independence (FYI) time period for verification of eligibility for subsidy extension. This modification will increase the number of youth eligible for program extensions, provide participating youth additional time to implement the criteria to meet extension requirements for rental assistance, increase self-sufficiency, and align with the Housing Commission’s biennial recertification cycle (every two years).

### **AFFORDABLE HOUSING IMPACT**

The initiatives contained in the FY 2025 MTW Annual Plan Amendment were designed to ensure program participants can access affordable housing within the City of San Diego by increasing the availability of rental units through development and preservation.

### **FISCAL CONSIDERATIONS**

The proposed funding sources and uses approved by this action, as specified in Section VII – Sources and Uses of Funding section of the FY 2025 MTW Plan Amendment, are included in the FY 2025 Housing Commission proposed budget.

### **HOUSING COMMISSION STRATEGIC PLAN**

This item relates to Strategic Priority Area No. 1: Increasing and Preserving Housing Solutions and Strategic Priority Area No 2: Helping Families Increase Opportunities for Quality of Life and Self-Sufficiency in the Housing Commission Strategic Plan for Fiscal Year (FY) 2022-2024.

### **EQUAL OPPORTUNITY CONTRACTING AND EQUITY ASSURANCE**

The following expanded community outreach efforts have been undertaken to proactively support the Housing Commission’s commitment to equity and inclusivity:

- Increased the number of residents receiving letters from 200 households to 2,500 households, informing them of the MTW Plan Amendment and public comment period. This includes households that may be directly impacted by the activities proposed in the Plan Amendment.
- Uploaded the Plan Amendment and information to the Housing Commission’s community engagement platform.
- Emailed information on the Plan Amendment and public comment period to every household in the Housing Commission’s Housing Choice Voucher program whose email address is on file.
- Developed a high-level overview of the MTW Plan Amendment and activities being proposed, which has been translated into all seven languages included in the Housing Commission’s Language Access Plan.

### **PREVIOUS COUNCIL and/or COMMITTEE ACTION**

#### **MTW Annual Plans**

On December 2, 2008, and November 21, 2008, the Housing Authority of the City of San Diego (Housing Authority) and the Housing Commission Board, respectively, authorized the Housing Commission to submit an application for reactivation of the Housing Commission's status as an MTW site and to submit the Housing Commission 2010 MTW Annual Plan to HUD.

On July 10, 2012, the Housing Authority approved resolution HA-1562, which delegated authority to the Housing Commission Board to "make amendments to and adopt Administrative Plans and MTW initiatives as authorized by San Diego Municipal Code 98.0301(d)(3) and 98.0301(7)."

The Housing Commission Board previously has authorized the submission of MTW Annual Plans and Amendments each year for FY 2011 (July 1, 2010 – June 30, 2011) through FY 2025 (July 1, 2024 – June 30, 2025).

At the request of then-Councilmembers Georgette Gómez and Barbara Bry, pursuant to San Diego Municipal Code Section 98.0301(e)(2), the FY 2019 MTW Annual Plan was presented to and approved by the Housing Authority on April 9, 2018 (Resolution HA-1778). In this instance, once this matter was referred to the Housing Authority for final action, by the request of then-Councilmembers Georgette Gomez and Barbara Bry, in accordance with Section 98.0301(e)(2), the Chair of the Housing Authority, who is the Council President, set the matter on the next available agenda of the Housing Authority, and the action taken by the Housing Commission was advisory only. The final action on the matter was made by the full Housing Authority of the City of San Diego.

#### **Standard Agreement**

On June 17, 2016, the Housing Commission Board authorized the submission of the Housing Commission MTW Agreement Extension.

On May 1, 2020, the Housing Commission Board authorized the Amendment to Attachment C of the Standard MTW Agreement to HUD.

### **COMMUNITY PARTICIPATION and PUBLIC OUTREACH EFFORTS**

The Housing Commission's MTW Annual Plan Amendment and a notice of public hearing were posted for a public comment period of 30 days on March 29, 2024. To promote community and participant involvement, the Housing Commission placed notices in local newspapers, including San Diego's largest circulation newspaper. Invitation letters were sent to a group of rental assistance participants requesting their participation. Additionally, invitation letters were emailed to over 10,000 households requesting their participation. The public hearing was held April 18, 2024, and all feedback and comments from the public relating to the plan were taken into consideration.

### **KEY STAKEHOLDERS and PROJECTED IMPACTS**

The MTW program affects current and future Housing Choice Voucher and Public Housing participants and owners. The intended impact of this program is to utilize federal dollars more efficiently, increase housing choice in the City, and encourage self-sufficiency among participants. The initiatives proposed in the FY 2025 MTW Annual Plan Amendment will increase the availability of affordable rental units to low-income families.

**ENVIRONMENTAL REVIEW**

Amending the FY 2025 MTW Annual Plan is not a project as defined by the California Environmental Quality Act Section 21065 and State CEQA Guidelines Section 15378(b) (4) as a government fiscal activity that does not involve commitment of funds to a specific project and Section 15378(b) (5) as an administrative activity of government that will not result in direct or indirect physical changes in the environment. The determination that this activity is not subject to CEQA, pursuant to Section 15060(c) (3), is not appealable and a Notice of Right to Appeal the Environmental Determination (NORA) is not required. The parties agree that the provision of any federal funds for the future funding of option years is conditioned on the City of San Diego’s final NEPA review and approval.

Respectfully submitted,

*Debra Fischle-Faulk*

Debra Fischle-Faulk  
Senior Vice President, Equity Assurance  
San Diego Housing Commission

Approved by,

*Jeff Davis*

Jeff Davis  
Deputy Chief Executive Officer  
San Diego Housing Commission

Attachments: Draft Fiscal Year 2025 MTW Plan Amendment

Hard copies are available for review during business hours at the information desk in the main lobby of the San Diego Housing Commission offices at 1122 Broadway, San Diego, CA 92101. Docket materials are also available in the “Governance & Legislative Affairs” section of the San Diego Housing Commission website at [www.sdhc.org](http://www.sdhc.org).



SAN DIEGO  
HOUSING  
COMMISSION

# Moving Forward Moving To Work Program Amendment to Annual Plan Fiscal Year 2025

San Diego Housing Commission  
Rental Assistance Division  
1122 Broadway, Suite 300  
San Diego, CA 92101  
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## SECTION I – INTRODUCTION AND AGENCY GOALS

### MESSAGE FROM THE PRESIDENT & CEO

Individuals and families with low income in the City of San Diego turn to the San Diego Housing Commission (SDHC) at times when they are experiencing their greatest vulnerability with something central to their basic wellness and stability—housing. As SDHC’s President & CEO, I want to be sure that our focus remains on the people we are serving. Equity, inclusion, diversity and access will be key components of our initiatives, as we build on the good work done in these areas in the past few years.



But we cannot address the housing and homelessness challenges in the City of San Diego alone. It will take innovative approaches and strong partnerships. Diverse voices further collaboration and innovation. I am a strong believer that relationship-building is a critical component to any agency’s success. I will meet with our customers and community members, City Councilmembers, SDHC Commissioners, community partners and stakeholders, and our staff to hear what they view as important priorities and goals for SDHC for the next year.

We will work with community organizations to reach populations and areas that historically have been underserved. We will enhance existing relationships and build new ones with community organizations to make the best housing opportunities and programs available. We will also rely on SDHC’s status as a Moving to Work (MTW) agency to continue to innovate. The flexibilities we have because of our status as an MTW agency are crucial to developing and implementing housing assistance programs to meet the needs of the individuals and families we serve.

The Fiscal Year 2025 MTW Annual Plan was reviewed by the public and approved by the SDHC Board of Commissioners in February. The Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by April 15, 2024. In our Fiscal Year 2025 MTW Annual Plan Amendment, we are proposing changes to our Rental Assistance Rent Reasonableness activity to include Project-Based Housing Vouchers. This activity was proposed in the Fiscal Year 2025 MTW Annual Plan for review. We are also proposing new activities to expand exceptions to expedite the placement of households with lower income or experiencing homelessness into rental homes and to modify the time period for eligibility verifications for subsidy extensions in the Family Unification Program Youth / Foster Youth to Independence program.

These initiatives will continue SDHC’s track record of implementing innovative, collaborative efforts to provide the housing assistance individuals and families in our community need. The work ahead will not be easy. But working together with elected officials, government leaders, community partners, our staff and the people we serve, we will continue to move toward even more positive impacts in our community.

Sincerely,

Lisa Jones  
President & CEO  
San Diego Housing Commission



### SHORT-TERM AND LONG-TERM MTW GOALS

#### LONG-TERM GOALS

##### SDHC STRATEGIC PLAN

SDHC’s Strategic Plan provides the vision, mission, purpose, core values and strategic priorities that guide SDHC’s decisions, initiatives and day-to-day efforts.

**Vision:** Everyone in the City of San Diego has a home they can afford.

**Mission:** The San Diego Housing Commission (SDHC) fosters social and economic stability for vulnerable populations in the City of San Diego through:

- Quality, affordable housing.
- Opportunities for financial self-reliance.
- Homelessness solutions.

**Purpose:** Help individuals, families and the San Diego community thrive.

**Core Values:** At SDHC, we:

- Serve our clients with equity, dignity and respect.
- Are committed to excellence and innovation in all we do.
- Believe in transparency and being good financial stewards.

##### Strategic Priority Areas:

1. Increasing and Preserving Housing Solutions.
2. Helping Families Increase Opportunities for Self-Sufficiency and Quality of Life
3. Investing in Our Team
4. Advancing Homelessness Solutions – Supporting the City of San Diego Community Action Plan on Homelessness
5. Advocacy, Communication, Public Engagement

The SDHC Board of Commissioners approved the Strategic Plan on July 9, 2021. SDHC’s Strategic Plan builds upon the accomplishments of the agency’s previous Strategic Plans.

##### COMMUNITY ACTION PLAN ON HOMELESSNESS FOR THE CITY OF SAN DIEGO

The Community Action Plan on Homelessness for the City of San Diego (Community Action Plan), which the San Diego City Council accepted in October 2019, established short-term achievable goals, key principles and foundational strategies that provide a guide for long-term success in addressing homelessness. SDHC was one of the lead agencies in the creation of the Community Action Plan, a comprehensive, 10-year plan for the City of San Diego.

The Community Action Plan recommended the creation of a governance structure that supports cross-agency collaboration, systems level thinking and accountability, including a Leadership Council to review progress and provide direction; an Implementation Team of senior staff; and a project manager position to keep progress on track.

In fall 2022, the Leadership Council requested that an updated analysis of the crisis response and housing needs in the Community Action Plan be conducted. As a result, the Implementation Team worked with Corporation for Supportive Housing (CSH) to conduct an updated needs analysis. CSH is a nationally recognized consultant that worked with the Steering Committee to develop the Community Action Plan in 2019.

Community Action Plan updates were presented to the San Diego City Council’s Land Use and Housing Committee and the City Council in fall 2023. The updated data help communities understand the amount and types of additional investments needed to address homelessness and for more efficient use of resources.

The updates identified several key trends, including:

- The number of available crisis response and housing options has almost doubled, resulting in more people accessing the services and housing they need to end their homelessness.



- Approximately 15,000 people a year have received assistance through City of San Diego- and SDHC-funded programs since 2019.
- More people are experiencing homelessness in the City of San Diego.
- There is an increasing need for prevention resources.

These projections outline how to provide access to housing and services for those who have entered the homeless system. Continued community conversations on housing production, zoning, affordability, availability, working with hospitals and jails, as well as access to mental health and substance use treatment services are critical to ensuring the prevention of homelessness in the community and permanent solutions that solve homelessness in the long-term.

In addition, SDHC continues to maintain a dashboard, available on SDHC’s website, that provides updates about progress made toward the Community Action Plan’s goals and objectives, as well as the Community Action Plan’s accomplishments.

### SHORT-TERM GOALS

#### HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT OF 2016

SDHC will be implementing all necessary policy and procedural changes by January 1, 2025, to ensure compliance with the Housing Opportunity Through Modernization Act (HOTMA), pursuant to the U.S. Department of Housing and Urban Development’s (HUD) Final Rule on HOTMA, which takes effect January 1, 2024.

This process includes notification to participants and updates of SDHC’s Administrative Plan for Section 8 Rental Assistance Programs, SDHC’s Admissions and Continued Occupancy Policy and numerous documents, forms and procedural changes to align SDHC’s rental assistance programs with HOTMA updates to the federal regulations. SDHC’s policies and procedures in which approved MTW waivers and activities supersede HOTMA will remain in effect, as allowed per the Final Rule on HOTMA published in the Federal Register on February 14, 2023.

#### HOMEKEY PROGRAM: ADDITIONAL FUNDING FOR HOMELESSNESS HOUSING

The State of California has awarded \$20.75 million to SDHC through the state’s Homekey Program to support two projects that will provide 75 permanent affordable rental housing units with supportive services for people experiencing homelessness in the City of San Diego.

On November 20, 2023, the SDHC Board of Commissioners voted 5-0 to authorize SDHC to accept and expend these funds:

- \$16.85 million for SDHC’s proposed purchase and rehabilitation of the Ramada Inn at [3737-3747 Midway Drive](#) in the Midway Community to create 62 affordable single-room occupancy (SRO) units, to be known as Pacific Village.
- \$3.9 million for SDHC’s collaboration with Wakeland Housing and Development Corporation to rehabilitate a vacant multifamily housing property at [2147 Abbott Street](#) to create 13 affordable housing units.

The County of San Diego and City of San Diego also have committed funds to these projects. SDHC has committed rental housing vouchers to help residents pay their rent at both properties when they are completed. Residents would receive access to supportive services, such as primary health care, mental and behavioral health care, and other community-based programs to best meet a resident’s individual needs.

SDHC also has submitted two additional applications for an additional \$63.5 million from the third round of funding for the Homekey program. A decision from the state on those applications is still pending. If approved, those Homekey funds would support SDHC’s purchase of two extended-stay hotel properties to create 266 additional permanent affordable rental housing units with supportive services for people experiencing homelessness.

The Homekey program requires all awarded funds to be expended within eight months of the award. All construction or rehabilitation must be completed within 12 months of the award letter, and full occupancy must be achieved within 15 months of the award letter.

#### INCREASING DENSITY AT SDHC PROPERTIES

The preliminary efforts to explore increasing density at SDHC-owned properties to create additional affordable housing opportunities are moving forward through the University Avenue Densification Pilot Project.

## SECTION I – INTRODUCTION AND AGENCY GOALS



This pilot project would increase density at Casa Colina, an SDHC-owned property which currently consists of 75 affordable units in City Heights for seniors with low income. This is part of a broader effort by SDHC to explore increasing density throughout its real estate portfolio to create additional affordable housing.

SDHC staff also continues to work with the County of San Diego regarding a parcel adjacent to Casa Colina. SDHC and the County of San Diego have come to terms on an exclusive negotiating agreement that outlines the process for SDHC to acquire the adjacent parcel and allow for the densification of it as well.

The California State Budget approved for Fiscal Year 2024 included \$2 million allocated directly to SDHC to support the densification pilot project. California State Senate President pro Tempore Toni Atkins advocated for this funding.

SDHC initially provided a presentation about the concept of increasing the density of its real estate portfolio on October 3, 2022, at the special joint meeting of the County of San Diego Board of Supervisors and the San Diego City Council. At that meeting, each jurisdiction adopted a joint resolution supporting an effort to increase density at SDHC properties as a way to increase the availability and production of affordable homes.

### SDHC COLLABORATIVE AFFORDABLE HOUSING DEVELOPMENTS

Furthering the goal of increasing and preserving affordable housing, the following SDHC collaborative developments are among approximately 2,387 affordable rental housing units that have received at least preliminary approval from the SDHC Board of Commissioners and are pending completion:

- **8th Avenue Family Housing** (new construction) – 79 affordable units for families with low income
- **Aquila Apartments** (new construction) – 180 affordable units for individuals and families with low-income (formerly 3Roots)
- **Aurora Apartments** (new construction) – 46 affordable units for families with low income (formerly Merge 56)
- **Cerro Pueblo** (rehabilitation) – 45 affordable units for families with low income
- **Cortez Hill Apartments** (new construction) – 87 affordable units for families with low income, of which 14 units are for families experiencing homelessness
- **Courthouse Commons** (new construction, mixed-income) – 41 affordable units for families with low income
- **Cuatro at City Heights** (new construction) – 115 affordable units for families with low income, including 30 veterans experiencing homelessness
- **Casa Nueva** (rehabilitation) – 51 affordable units for families with low income
- **Harrington Heights** (new construction) – 270 affordable units for individuals and veterans experiencing homelessness and individuals with very low income (formerly 13th & Broadway)
- **Iris Avenue Trolley Apartments** (new construction) – 63 affordable units for families with low income
- **Levant Senior Cottages** (new construction) – 126 affordable units for low-income seniors
- **Mercado Apartments** (rehabilitation) – 142 affordable units for families with low income
- **Messina Senior Apartments** (new construction) – 78 affordable units for seniors with low income
- **Modica** (new construction) – 93 affordable units for individuals and families with low income
- **Navajo Family Apartments** (new construction) 44 affordable units for families with low income
- **Nestor Senior Village** (new construction) – 73 affordable rental housing units for seniors experiencing homelessness
- **SkyLINE** (new construction) – 99 affordable units for families with low income
- **Sea Breeze Gardens** (new construction) – 267 affordable units for families with low income
- **Serenade on 43<sup>rd</sup>** (partial rehabilitation and partial new construction) – 64 affordable units for families with low income, including 31 units set aside for individuals experiencing homelessness with a serious mental disability.
- **ShoreLINE** (new construction) – 124 affordable units for families with low income
- **The Iris** (new construction, mixed income) – 99 affordable units for families with low income
- **Tranquility at the Post 310** (new construction, mixed income) – 42 affordable units for veterans with low income or experiencing homelessness
- **Ulric Street Apartments II** (new construction) – 59 affordable units for seniors with low income
- **Ventana al Sur** (new construction) – 100 affordable rental housing units for seniors with low income or experiencing homelessness



## SECTION II – GENERAL OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION MATRIX

#### 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 UFAS UNITS	
	0/0	2	3	4	5	6+			FULLY ACCESSIBL E	ADAPTABLE
N/A	0	0	0	0	0	0	0	N/A	0	0

TOTAL PUBLIC HOUSING UNITS TO BE ADDED 0

*\* Select "Population Type" from: Elderly, Disabled, General, Elderly/Disabled, Other*

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

N/A

#### II. PLANNED PUBLIC HOUSING UNITS TO BE REMOVED

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

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A	0	N/A

0

TOTAL PUBLIC HOUSING UNITS TO BE REMOVED IN THE PLAN YEAR



**A. HOUSING STOCK INFORMATION MATRIX**

**III. 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 AHAP will be in place by the end of the Plan Year.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
73rd Street Apartments	30	N/A	Homeless
Navajo Family Apartments	8	N/A	Low-Income
Terrasini Senior Apartments	8	N/A	Low-Income
Beyer Boulevard	30	N/A	Low-Income
Rose Creek Village	29	N/A	Low-Income

105

PLANNED TOTAL VOUCHERS TO BE NEWLY PROJECT-BASED

**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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Take Wing	8	Leased/Issued	N/A	Homeless
Hollywood Palms	23	Leased/Issued	N/A	Low-Income
Leah Residence	14	Leased/Issued	N/A	Homeless
Townspople	9	Leased/Issued	N/A	Homeless
Potiker	36	Leased/Issued	N/A	Low-Income
Alabama Manor	14	Leased/Issued	N/A	Low-Income
Meade	10	Leased/Issued	N/A	Low-Income
Santa Margarita	12	Leased/Issued	N/A	Low-Income
Courtyard	3	Leased/Issued	N/A	Low-Income
Hotel Sandford	27	Leased/Issued	N/A	Low-Income
Connections Housing	73	Leased/Issued	N/A	Homeless
Mason Hotel	16	Leased/Issued	N/A	Homeless
Parker-Kier	22	Leased/Issued	N/A	Homeless
Celadon	88	Leased/Issued	N/A	Homeless
Alpha Square	76	Leased/Issued	N/A	Homeless
New Palace Hotel	79	Leased/Issued	N/A	Homeless
Village North Senior	44	Leased/Issued	N/A	Homeless
Atmosphere	51	Leased/Issued	N/A	Homeless
Talmdadge Gateway	59	Leased/Issued	N/A	Homeless
Cypress Apartments	62	Leased/Issued	N/A	Homeless
North Park Senior	8	Leased/Issued	N/A	Homeless
Quality Inn	91	Leased/Issued	N/A	Homeless
West Park	46	Leased/Issued	N/A	Homeless
Alpha Lofts	52	Leased/Issued	N/A	Homeless
Zephyr	84	Leased/Issued	N/A	Homeless
Vista Del Puente	38	Leased/Issued	N/A	Homeless
The Beacon	43	Leased/Issued	N/A	Homeless
Stella	62	Leased/Issued	N/A	Homeless
The Link	72	Leased/Issued	N/A	Homeless
San Ysidro Senior	50	Leased/Issued	N/A	Homeless
Benson Place	82	Leased/Issued	N/A	Homeless
Ivy Apartments	52	Leased/Issued	N/A	Homeless



## SECTION II – GENERAL OPERATING INFORMATION



Trinity Place	73	Leased/Issued	N/A	Homeless
14th & Commercial	254	Leased/Issued	N/A	Homeless
The Helm (Front and Beech)	32	Leased/Issued	N/A	Homeless
The Orchard at Hilltop	25	Leased/Issued	N/A	Low-Income
Milejo Village (Jamboree)	64	Leased/Issued	N/A	Low-Income
Valley Vista	190	Leased/Issued	N/A	Homeless
Kearny Vista	142	Leased/Issued	N/A	Homeless
Hillcrest Inn	12	Leased/Issued	N/A	Homeless
ShoreLINE (Grantville)	25	Leased/Issued	N/A	Low-Income
Tizon	44	Leased/Issued	N/A	Low-Income
Nestor Senior Village	73	Leased/Issued	N/A	Low-Income
Puesa del Sol (Ulric II)	59	Leased/Issued	N/A	Low-Income
Levant Senior Cottages	70	Leased/Issued	N/A	Low-Income
Casa Nueva	19	Leased/Issued	N/A	Low-Income
Sorrento Tower	17	Leased/Issued	N/A	Low-Income
ADU Pilot	5	Leased/Issued	N/A	Low-Income
Cuatro at City Heights	48	Committed	N/A	Low-Income
Iris at San Ysidro	25	Leased/Issued	N/A	Low-Income
SkyLINE (RB Transit Village)	30	Committed	N/A	Low-Income
Harrington Heights (13th and Broadway)	105	Committed	N/A	Low-Income and homeless
Tranquility At The Post 310	10	Leased/Issued	N/A	Homeless
Ventana Al Sur	25	Leased/Issued	N/A	Homeless
Southwest Village	50	Leased/Issued	N/A	Low-income and homeless
Cortez Hill Apartments	87	Leased/Issued	N/A	Low-income and homeless
Encanto Gateway	9	Committed	N/A	Homeless
Willow Canyon	90	Leased/Issued	N/A	Homeless
Presidio Palms	161	Leased/Issued	N/A	Homeless
Pacific Village	47	Leased/Issued	N/A	Homeless
Abbot Street Apartments	13	Leased/Issued	N/A	Homeless
Serenade on 43rd	32	Committed	N/A	Homeless
Messina	8	Leased/Issued	N/A	Low-Income
Taormina Family Apartments	8	Committed	N/A	Low-Income
Price Humble Heart	33	Committed	N/A	Low-Income

**3,291**

**PLANNED TOTAL EXISTING PROJECT-BASED VOUCHERS**

*\* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued*



**A. HOUSING STOCK INFORMATION MATRIX**

**V. PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN 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, etcetera.

No changes anticipated.

**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.

SDHC anticipates Capital Fund Program formula funds will be used to fund the soft costs, the hard costs and administrative costs of various renovation activities throughout the (8) Public Housing properties consisting of (189) public housing units. Hard costs may include upgrades to property fencing, parking lot seal and stripe, security camera and safety improvements, limited stair upgrades, exterior area and building lighting, limited electrical, and limited site improvements. Soft costs may include architecture and engineering and third-party consultants for due diligence related activities. The property and scope selection are to be determined.

SDHC also anticipates MTW funds will be used to fund capital expenditure costs of various renovation activities in Project Based Voucher and Local, Non-Traditional units. Costs may include energy efficiency measures, upgrades to plumbing and other critical needs projects.



**B. LEASING INFORMATION MATRIX**

**I. PLANNED NUMBER OF HOUSEHOLDS SERVED**

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	2,268	189
MTW Housing Choice Vouchers Utilized	183,000	15,250
Local, Non-Traditional: Tenant-Based^	14,280	1,190
Local, Non-Traditional: Property-Based^	13,469	1,122
Local, Non-Traditional: Homeownership^	0	0
<b>PLANNED TOTAL HOUSEHOLDS SERVED</b>	<b>213,017</b>	<b>17,751</b>

\* "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	Sponsor-Based Subsidy Program / 2011-8	10,992	916
Tenant-Based	Transitional Project-Based Subsidy Program / 2013-6	564	47
Tenant-Based	Monarch Housing Program / 2016-1	300	25
Tenant-Based	Guardian Scholars Program / 2016-2	1,080	90
Tenant-Based	Homeless Shelter Beds / 2016-3	384	32
Tenant-Based	Moving On Program / 2017-1	540	45
Tenant-Based	Moving Home Program / 2018-1	420	35
Property-Based	Affordable Housing Development / 2011-4	12,857	1,071
Property-Based	Preservation of Affordable Housing in the City of San Diego / 2021-2	612	51
Homeownership	Homeownership Program / 2022-1	0	0
<b>PLANNED/ACTUAL TOTALS</b>		<b>27,749</b>	<b>2,312</b>

\* 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**

Discussion of any anticipated issues and solutions utilized in the MTW housing program listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	For the 2022-1. Homeownership Program, SDHC is continuing focus efforts on homeownership and serve families, but is planning on leveraging other opportunities to further this effort.



**C. WAITING LIST INFORMATION MATRIX**

**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
Housing Choice Voucher: Tenant-Based	Community Wide	58,706	Open
Housing Choice Voucher: Project-Based	Community Wide	39,500	Open
Housing Choice Voucher: Project-Based	Site-Based	12	Closed
Public Housing	Community Wide	50,380	Open
Local Non-Traditional	Community Wide	N/A	N/A

**Please describe any duplication of applicants across waiting lists:**

Applicants have the opportunity to apply to multiple rental assistance programs and often appear on multiple wait lists. Local Non-Traditional programs utilized the Coordinated Entry System (CES) for waitlist purposes.

**II. PLANNED CHANGES TO WAITING LIST IN THE PLAN YEAR**

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Housing Choice Voucher: Tenant-Based	None
Housing Choice Voucher: Project-Based	None
Housing Choice Voucher: Project-Based (Single)	None
Public Housing	None
Local Non-Traditional	None



## SECTION III – PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

### 2025-1. RENTAL ASSISTANCE RENT REASONABLENESS (RE-PROPOSED)

#### Activity Description

In order to foster housing stability for rental assistance participants, SDHC is re-proposing the MTW activity to modify the regulatory definition of Rent Reasonableness to limit Housing Choice Voucher rent increases to the lower of 5% plus the Consumer Price Index (CPI) or 10%, subject to rent reasonableness within a 12-month period. The original activity proposal is currently being reviewed by the U.S. Department of Housing and Urban Development. For project-based vouchers (PBV), rent increases will be limited to the lowest of 5% plus the Consumer Price Index (CPI), 10%, or the payment standard, subject to rent reasonableness. The modification will increase the consistency of SDHC’s policy with rent control provisions in effect for unsubsidized housing in San Diego. The policies and procedures related to this activity will be detailed in SDHC’s Section 8 Administrative Plan and will include ability of a landlord to appeal if this activity would create a hardship for that landlord.

By limiting the rent increases to a reasonableness percentage in this manner, SDHC, will approve rent increases according to the rent increase trends for similar unassisted units in the rental industry.

The proposed activity will further enhance participants’ ability to maintain stability in their housing and may prevent terminations or evictions and facilitate a more constant and predictable tenant rent. The activity will foster an environment where landlords implement measured and incremental rent increases rather than sudden and significant rental increases. SDHC dedicates many of its project-based vouchers for permanent supportive housing, which provides assistance to the City’s most vulnerable, lowest income households. This activity update will help prevent rent premiums and enhance long-term housing stability for these households.

#### Statutory Objectives

This activity will achieve the statutory objective to use federal dollars more efficiently through aligning Housing Choice Voucher and Project Based rent increases with the rental industry. It will support the agency’s effort to maintain effective program operations and increase the ability of program participants to remain stably housed.

By limiting the amount by which rents can increase and thus reducing program costs, the activity will allow SDHC to allocate funds more strategically, potentially assisting a larger number of households, support the development of additional housing units for low-income households, or providing additional supportive services. The activity also will bolster housing choice, by increasing the ability of program participants to remain housed and freeing up funding that can be used to serve additional households.

#### Anticipated Timeline to Achieve Objectives

The Rental Assistance Rent Reasonableness Policy aims to bolster housing stability through measures that limit landlords’ capacity to escalate rents, thereby promoting more affordable and consistent landlord submissions of increases and promoting ongoing affordability of developments. This activity will provide a continuing benefit once implemented, and thus SDHC anticipates the continuation of this activity as long as local rental market conditions result in a need for it.

The implementation of this activity is set to commence within 120 days following approval from HUD. SDHC will promptly notify landlords through a combination of mailed correspondence and electronic notifications to ensure comprehensive updates are provided. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes.

#### Activity Metrics Information

METRIC	BASELINE	BENCHMARK	OUTCOME
HC #2: Units of Housing Preserved	0	14,374	

## SECTION III – PROPOSED MTW ACTIVITIES – HUD APPROVAL REQUESTED



Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).			
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### Projected Outcomes

- HC #2: By including percentage limitations to the definition of Rent Reasonableness, households under the Housing Choice Voucher Program will benefit from policies to preserve housing.

### Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

### Cost Implications

SDHC anticipates long term cost savings related to the measures contained in the Rental Assistance Rent Reasonableness Policy. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding. However, SDHC can predict that limiting rent increases will help SDHC incrementally respond and predict HAP costs and make any necessary program adjustments.

### Need/Justification for MTW Flexibility

The amended and restated Moving to Work agreement, Attachment C, Section (D)(2)(c) containing waivers of Sections 8(o)(l), 8(0)(2), 8(0)(3), 8(0)(10) and 8(o)(l3)(H)-(l) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, Section (D)(2)(b) containing waivers of Section 8(0)(10) of the 1937 Act and 24 C.F.R. 982.507, and Section (D)(7)(a) containing waivers of 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan

### Rent Reform/Term Limit Information (if applicable)

#### Impact Analysis

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

Advocating for reasonable increases ensures participants facing increases in their rent portion can more comfortably navigate and manage the financial implications to their household budget.

This activity would not have a negative impact on the household rent/tenant share.

**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.**

To effectively execute and monitor the policy, SDHC will continue to collect comprehensive metrics regarding interim certifications related to this initiative and will also expand metrics to include more details regarding the percent change of submitted rent increases.

**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.)**

A numerical analysis is unable to be conducted due to the nature of the activity. An unforeseen consequence could be a decrease in landlords' interest in the program due to the supplementary policies associated with setting rents.

**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.**

SDHC will continue to leverage the benefits of the Landlord Partnership Program that provides financial and support incentives to landlords who rent to families who receive Section 8 Housing Choice Vouchers through its programs. The below establish incentives will continue to aim to mitigate potential disinterest from landlords who might otherwise refrain from participations due to increased rental restrictions. Nevertheless, SDHC will continue to evaluate any such impact and whether any adjustment in the activity is needed as a result.

#### Incentive Payments

Upon Housing Assistance Payment contract execution and tenant move-in, SDHC will disburse \$500 for each rental unit rented to a Section 8 Housing Choice Voucher household.



**Landlord Assurance Fund**

Landlords have access to submit assurance fund claims to receive funds that will help cover expenses for repairs as a result of a tenant move out beyond normal wear and tear and rent due that exceed the security deposit. Funds are only accessible in the assurance fund within the first two years of new tenancy, and maximum reimbursement per claim is \$3,000.00. This incentive is subject to SDHC Assurance Fund Guidelines.

**Move Flexibility Allowance**

In cases when there is a delay in the Section 8 Housing Choice Voucher tenant vacating a subsidized unit to move into a new unit, the landlord may request up to an additional five days of Housing Assistance Payment overlap to ensure neither landlord is harmed in the process. Landlords can apply for this incentive by contacting the housing assistant assigned to the tenant that is vacating the subsidized unit.

**Mobility Counseling Program**

An SDHC Mobility Counselor assists with pre- and post-moving counseling, housing search assistance, and guidance about neighborhood features for families moving to Choice or Enterprise Communities within SDHC’s Choice Communities Initiative. Mobility Counselors support families and landlords in the move process to ensure timely lease-ups.

**SDHC Landlord Service Unit**

SDHC has established a Landlord Service Unit, which consists of seven SDHC employees who provide quality customer service to landlords and tenants in the HCV program. This includes a Landlord Liaison, who provides HCV Program education, guidance, and support to landlords who rent to HCV program participants, as well as a dedicated team of Mobility Counselors, who support families in the moving process to ensure timely lease-ups.

**Security Deposit Loan Assistance**

Families moving to Choice or Enterprise Communities through SDHC’s Choice Communities Initiative are eligible for no-interest security deposit loans up to the payment standards for the area for their voucher size.

**Hardship Case Criteria**

Not applicable. This activity only will reduce rents for program participants in some instances and will have no negative impacts that could cause hardship for them.

**Description of Annual Reevaluation**

To effectively execute and monitor the policy, SDHC will continue to collect comprehensive metrics regarding interim certifications related to this initiative and will also expand metrics to include more details regarding the percent change of submitted rent increases.

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

**Transition Period**

The implementation of this activity is set to commence within 120 days following approval from HUD. SDHC will promptly notify landlords through a combination of mailed correspondence and electronic notifications to ensure comprehensive updates are provided. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes.

**2025-2. EXPEDITED ELIGIBILITY AND LEASING EXCEPTIONS**

**Activity Description**

The need for additional affordable housing in San Diego remains significant. The City of San Diego continues to experience a shelter crisis, as declared by the San Diego City Council in a resolution adopted February 7, 2022, that remains in effect. Therefore, additional incentives and strategies are necessary to expedite the placement of low-income households (including seniors, people with disabilities and families) and households experiencing homelessness into rental homes with voucher assistance.



The annual Point-in-Time Count, conducted by the San Diego Regional Task Force on Homelessness (RTFH) on January 26, 2023, identified 6,500 individuals experiencing homelessness in the City of San Diego, a 35% increase from 2022. The city of San Diego's rental vacancy rate of 2.64% also poses a challenge for people experiencing homelessness finding suitable rental housing as rental units are scarce and limited.

SDHC experienced success with the waivers implemented for the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Emergency Housing Voucher (EHV) program to expedite housing placements and maintain housing stability.

SDHC aims to build upon previous waivers and expand on the Housing Opportunities through Modernization Act (HOTMA) self-certifications to continue streamlining processes for new admissions to allow eligibility determinations and approval of housing to be completed in the shortest times possible and to strengthen the City of San Diego's efforts to address the housing crisis. This is essential to place vulnerable households into the limited supply of housing as it becomes available in San Diego.

Approval of these measures will streamline the process for new admissions of vulnerable populations, including people experiencing homelessness to allow eligibility determinations and approval of housing to be completed in the shortest times possible. This is essential to place vulnerable households into the limited supply of housing as it becomes available in San Diego.

Proposed exceptions will include the following:

1. Verification of legal Identity (ID, DOB) and Social Security Number 24 CFR 5.216(g)(1), 24 CFR 5.403; 5.603
  - Waive the requirement for original documents. SDHC will allow photocopies of acceptable documentation and alternative verification including self-certification for unhoused household members who are unable to provide evidence of their legal identity (ID, DOB) and/or SSN.
  - SDHC will run the EIV report within 120 days of the New Admission processed date. If SSN verified, no further verification is required. If not verified in EIV, must provide documentation as required under 24 CFR 5.216(g)(1)
2. Citizenship Verification: 24 CFR 5.508(b)(2); 5.508(b)(3)
  - If a member of the family is unable to provide evidence of their eligible non-citizen status SDHC may accept a signed self-certification of applicant's eligible non-citizen status. Required documentation must be provided and verified within 90 days of the new admission to be eligible for continued assistance. Exceptions to the 90-day timeline may be made on a case-by-case basis if applicant/participant can provide verification that additional time is needed to provide required documentation.
3. Income Verification 24 CFR 5.240(c)
  - SDHC may accept self-certification of income and/or expenses without notarization as the highest form of verification for unhoused applicant family that is unable to provide or if the existing income verification hierarchy is unavailable.
4. Additional Flexibilities for Permanent Supportive Housing (PSH) Programs to Expedite Eligibility and Leasing
  - Criminal Background Check: The criminal history report performed by property management can be used.
  - Tenant Briefing: SDHC will allow applicant to complete a briefing within 30 days of the move-in.

### Statutory Objectives

The activity will achieve the statutory objective to use federal dollars more efficiently by further streamlining processes in the Rental Assistance Division and may improve housing choices for low-income families and persons experiencing homelessness by creating solutions to address barriers in leasing up .

### Anticipated Timeline to Achieve Objectives

SDHC anticipates implementing the streamlining measures by the beginning in Fiscal Year 2025.





**Activity Metrics Information**

METRIC	BASELINE	BENCHMARK	OUTCOME
<b>CE #2: Staff Time Savings</b> <i>Total time to complete the task in staff hours (decrease)</i>	1,414	1,060.5	
<b>HC #4: Displacement Prevention</b> <i>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.</i>	0	7	

**Projected Outcomes**

- CE #2: SDHC anticipates reducing staff time to process new admissions by 25%
- HC #4: SDHC is anticipating a decrease in the number of households who would lose assistance

**Description of Data Sources for Metrics**

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

**Cost Implications**

SDHC anticipates long term cost savings related to the measures contained in this activity. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding.

**Need/Justification for MTW Flexibility**

The amended and restated Moving to Work agreement, Attachment C, Section (D)(3)(b) containing waivers of certain provisions of 24 C.F.R. 982.516 and 982 Subpart E,

**Rent Reform/Term Limit Information (if applicable)**

**Impact Analysis**

An impact analysis was conducted that reviewed new admissions completed during the COVID pandemic, when similar regulatory waivers and alternative requirements for Housing Choice Voucher were allowable under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136). The analysis compared the new admissions in SDHC’s special programs that were completed during the CARES Act timeframe against the number of households who ended participation from the program due to failure to provide information or unreported income. Only 1% of the households were terminated due to these reasons.

Further streamlining processes are expected to create stability and improve social and emotional well-being by expediting housing placements and providing families with subsidies in the shortest times possible. SDHC experienced success with the waivers implemented in the CARES Act to expedite housing placements and maintain housing stability. Of the new admissions completed during the time, similar waivers were implemented under the CARES Act, only 1% of households experiencing homelessness were terminated due to failure to provide information or due to unreported income.

**Hardship Case Criteria**

This proposed policy will have a positive effect on participants by expediting housing placements and providing families with subsidies in the shortest times possible.

**2025-3. FAMILY UNIFICATION PROGRAM (FUP)/FOSTER YOUTH TO INDEPENDENCE (FYI)**

**Activity Description**

This activity is to modify Family Unification Program (FUP) Youth / Foster Youth to Independence (FYI) Subsidy extension approval months.



The Fostering Stable Housing Opportunities (FSHO) amendments made changes to the FUP authorized under section 8(x) of the U.S. Housing Act of 1937 to provide eligible youth with an extension of FUPY/FYI voucher assistance for up to 24 months beyond the 36-month time limit of assistance if they are participating in an FSS program under section 23 of the U.S. Housing Act of 1937 (42 U.S.C. 1437u) expanding access to housing youth exiting foster care for up to 60 months. The changes also included FYI vouchers.

The FSHO applies to youth where the effective date of the Housing Assistance Payment Contract (HAP) execution is after December 27, 2020. The FSHO provides an extension of voucher assistance for up to 24 months for FUP/FYI youth who are participating in a FSS program, for FUP/FYI youth who are unable to enroll in FSS but are engaged in education, workforce development, or employment activities for at least 9 months of the 12-month period preceding the extension and for FUP/FYI youth who meet one of the statutory exemptions.

FSHO compliance is set on an annual basis at the end of the 36-month and 48-month time periods in conjunction with reviews for determining income eligibility for the HCV program. There are recommendations for PHAs to ensure that sufficient time is provided for the FUP/FYI youth to demonstrate that they meet one of these statutory requirements; and MTW agencies may establish alternative terms, conditions or requirements for the extension of FUP/FYI assistance and include the terms in the Annual MTW Plan.

SDHC proposes to modify the Family Unification (FUP) Youth/Foster Youth to Independence (FYI) time period for verification of eligibility for subsidy extension. SDHC will review participant eligibility for subsidy extension by the end of the 24-month and 48-month time periods instead of at 36-months and 48-months.

This modification will increase the number of youth eligible for program extensions, provide participating youth additional time to implement the criteria to meet extension requirements for rental assistance, increase self-sufficiency, and align with SDHC’s biennial recertification cycle.

If a youth does not meet the extension requirement at the end of the 24-month period, SDHC will continue to communicate with the youth between the 24-month and 36-month time period, enabling the youth sufficient time to meet one of the statutory conditions that allow for the extension of FUPY/FYI assistance. SDHC will not conduct a review for determining income eligibility for the HCV program at 36 months.

**Statutory Objectives**

This activity will increase self-sufficiency because it will allow the youth additional time under the program to participate in a FSS program or engage in education or workforce activities. It will also achieve the statutory objective to use federal dollars more efficiently because the review timing will align with SDHC’s biennial recertification cycle and will reduce administrative burden of having to complete program voucher extension, for eligible participants, outside of the regular biennial recertification cycle.

**Anticipated Impacts and Timeline to Achieve Objectives**

SDHC anticipates implementing the streamlining measures by the beginning of Fiscal Year 2025.

**Activity Metrics Information**

METRIC	BASELINE	BENCHMARK	OUTCOME
<b>CE #2: Staff Time Savings</b> <i>Total time to complete the task in staff hours (decrease)</i>	40	20	
<b>SS #5: Households assisted by Services that Increase Self-Sufficiency</b> <i>Number of households receiving services aimed to increase self sufficiency (increase).</i>	0	16	

**Projected Outcomes**



- CE #2: SDHC is anticipating a decrease in overall staff hours.
- SS #5: SDHC is anticipating an increase in the number of youth who will be assisted by services that increase self-sufficiency.

### Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

### Cost Implications

SDHC anticipates long term cost savings related to the measures contained in this activity. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding.

### Need/Justification for MTW Flexibility

### Rent Reform/Term Limit Information (if applicable)

#### Impact Analysis

An impact analysis was performed that reviewed current active participants and found that 40% of participants would benefit from this activity because they are currently not enrolled in the Family Self Sufficiency Program. Providing the option to extend their program expiration date at the 24 month mark, instead of the 36 month mark, may incentivize participants to enroll in the FSS program earlier, which in turn increases their chances of becoming self-sufficient by the end of the FUP program expiration period. Additionally, the earlier participants enroll in the FSS program, the more time they have to work on goals to attain self-sufficiency.

#### Hardship Case Criteria

No negative impact is anticipated so a hardship is not necessary for this activity. SDHC will continue to work with participants to encourage them to enroll in FSS or meet another extension eligible activity between the 24 month and 36 month period before their initial program expiration date. Checking for initial program extension at 24 months allows SDHC staff to identify participants not enrolled earlier and work with them to enroll in FSS and or to encourage them to seek or continue employment, workforce development, or education opportunities 9 of the 12 months prior to the 36 month program participation period



## SECTION IV – APPROVED MTW ACTIVITIES

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## IMPLEMENTED ACTIVITIES

<p><b>2022-1.</b> <b>HOMEOWNERSHIP PROGRAM</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2022</b> <b>RE-PROPOSED: N/A</b></p>
	<p>Using Broader Use of Funds Authority, SDHC allocated up to \$5 million towards the existing first-time homebuyer's programs, which should assist up to 50 families under 80% AMI in being able to purchase a home in the City of San Diego. Currently, SDHC receives funding for its homeownership programs via HOME, Community Development Block Grants (CDBG), California CalHome Program funds, and the City of San Diego Affordable Housing Fund.</p>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2021-2.</b> <b>PRESERVATION OF AFFORDABLE HOUSING IN THE CITY OF SAN DIEGO</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2021</b> <b>RE-PROPOSED: N/A</b></p>
	<p>SDHC created a Local Non-Traditional, Property-Based activity to provide financing for the preservation and rehabilitation of properties that are not owned by SDHC. In seeking funding for preservation or rehabilitation, landlords will be incentivized to maintain the affordability of the units and improve housing stock as they provide safe, decent and sanitary dwelling units.</p>	
	<p>SDHC is committed to preserving affordable housing within the City of San Diego, by developing methods of financing to incentivize property owners to preserve their existing affordable housing units. Financing received through SDHC will help these property owners complete necessary health and safety upgrades to dwelling units that could normally be cost-prohibitive, leading to an increase in rent for tenants. In receiving this funding, this ensures that properties receiving SDHC funds remain affordable to low-income families for the foreseeable future.</p>	
	<p>During FY 2021 and FY 2022, NOFAs were developed aimed at the preservation of deed-restricted and naturally occurring affordable housing (NOAH).</p>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2021-1.</b> <b>ESTABLISHMENT OF ALTERNATIVE REASONABLE COST LIMITS</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2021</b> <b>RE-PROPOSED: N/A</b></p>
	<p>SDHC received permission to develop alternative reasonable cost limits to include Total Development Costs (TDC) and Hard Construction Costs (HCC) for the amount of Moving to Work funds that can be contributed in SDHC's local non-traditional development and rehabilitation activities. Over the past several years, the San Diego metropolitan area has seen massive increases in the cost to develop and rehabilitate new and existing properties.</p>	
	<p>SDHC has seen multiple projects exceed HUD-published limits for the San Diego region, as the Rental Housing Finance Division is a lender, conduit bond issuer, and administrator of the City of San Diego's affordable land use programs including the Inclusionary, Density Bonus, Single-Room Occupancy, and Coastal Replacement Housing ordinances. Using the alternative reasonable cost formula, SDHC was able to increase its ability to ensure that more affordable units are developed or rehabilitated within the City of San Diego.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>FY 2023: The alternative reasonable cost limits were updated using the approved activity methodology</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	



**IMPLEMENTED ACTIVITIES**

<p><b>2020-1. LANDLORD RETENTION AND INCENTIVE PROGRAM</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2020</b> <b>RE-PROPOSED: N/A</b></p>
	<p>The Landlord Partnership Program (LPP) aims to expand rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive by providing both financial and supporting incentives to landlords who rent to HCV Program participants within the City of San Diego.</p>	
	<p>Incentives are designed to recruit new landlords and units as well as retain existing units within the portfolio of available housing.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2023: Landlord Partnership Assurance Fund: For damages caused by tenant beyond normal wear and tear or failure to pay rent, landlords may request assurance funds to cover expenses that exceed security deposits. Landlords can access assurance funds only within first two years of new tenancy. SDHC will establish a maximum permissible award per tenancy. The maximum will be determined by SDHC using the local market averages and may be adjusted for inflation, the proposed budget for this fund is \$250K.</li> <li>• FY 2022: SDHC included other eligible expenses related to the leasing of units and recruitment/retention of HCV owners to facilitate the successful leasing and use of housing vouchers by families. This may include, but not be limited to, application fees, processing fees, holding deposits, landlord recruitment and incentive payments, such as unit hold payments, to assist families with various up-front costs for leasing units in an expedited manner.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2018-1. MOVING HOME: A RAPID REHOUSING PROGRAM</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2018</b> <b>RE-PROPOSED: 2024</b></p>
	<p>Using Broader Uses of Funds Authority, SDHC created rapid re-housing program to provide housing subsidies to individuals and households experiencing homelessness while supportive services are provided to strengthen stabilization. The activity was also expanded to include a rapid stabilization component for individuals and households who are experiencing significant housing instability and are considered highly or especially vulnerable should they lose their housing.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2024: The activity was re-proposed to include a rapid stabilization component for individuals and households who are experiencing significant housing instability.</li> <li>• FY 2020: The program budget was increased to \$5 million in a technical amendment approved in April 2020 due to COVID-19.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> Moving Home has been re-proposed in the FY 2024 MTW Annual Plan to include a rapid stabilization component.</p>	
<p><b>2017-1. THE MOVING ON PROGRAM</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR APPROVED: 2017</b> <b>RE-PROPOSED: N/A</b></p>
	<p>Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to formerly homeless individuals and families no longer requiring a permanent supportive housing solution to sustain housing stability.</p>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	



## IMPLEMENTED ACTIVITIES

### 2016-3. HOMELESS SHELTER BEDS

**PLAN YEAR APPROVED:** 2016  
**RE-PROPOSED:** N/A

**DESCRIPTION**

In FY 2016, SDHC received approval under Broader Uses of Funds Authority to subsidize shelter beds in the City of San Diego. Shelter programs serve a variety of needs and subpopulations. SDHC and regional partners have identified, similar to housing interventions, that a continua of options is needed to engage certain sub-populations, especially those that are historically hesitant to enter traditional congregate shelter. This approach aligns with the goals and practices set forth in the Community Action Plan on Homelessness for the City of San Diego. All contracted programs are required to follow Housing First principles with low barriers to entry and align with regional Continuum of Care community standards and national best practices as detailed in contracted scopes of work. In alignment with national best practice to provide low-barrier shelter access, only criminal history related to life-time sex offender status and convictions resulting from manufacturing methamphetamine in federally assisted housing will be considered.

*Prior Updates*

- FY 2022: SDHC will provide MTW funding to shelter providers through a competitive process, to develop and/or acquire new family congregate sites. In addition, the program budget will be increased to \$12.8 million, based on an average cost of \$52.06 per night.
- FY 2020: The program MTW budget was increased to \$8 million.

**PLANNED NON-SIGNIFICANT CHANGES:** SDHC may provide MTW funding for homelessness sector programs/services to provide shelter services and to develop and/or acquire new traditional congregate or alternative safe sheltering sites.

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None

**PLANNED SIGNIFICANT CHANGES:** None

### 2016-2. THE GUARDIAN SCHOLARS PROGRAM

**PLAN YEAR:** 2016  
**RE-PROPOSED:** N/A

**DESCRIPTION**

Using Broader Uses of Funds Authority, SDHC provides funding to San Diego State University to assist students with the housing component of their education. The target population is former foster care youth, wards of the court, or unaccompanied homeless youth. SDHC provides \$200,000 annually and matches up to an additional \$400,000 of philanthropic funds for an aggregate total of \$600,000 annually.

*Prior Updates*

- FY 2023: The SDHC will determine how frequently it will revisit based on market trends and funding availability the compensation to award the program
- FY 2021: A modified alternate HQS policy will be used for the units funded through the program.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None

**PLANNED SIGNIFICANT CHANGES:** None



**IMPLEMENTED ACTIVITIES**

**2016-1. THE MONARCH SCHOOL PROJECT**

**PLAN YEAR: 2016  
RE-PROPOSED: 2020**

**DESCRIPTION**

Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to homeless families with minors enrolled in Monarch School. The Achievement Academy delivers work readiness services (such as job placement and training) to the adult family members.

*Prior Updates*

- FY 2024: In order to prevent housing instability and encourage self-sufficiency for families participating in the Monarch Program, in FY 2024 SDHC updated its administrative plan to detail that SDHC may provide continued assistance to families even if they no longer have a student enrolled in the Monarch School. If a family moved to a different school district or the youngest child has completed 12th grade and/or is no longer attending school continuously, SDHC will determine the appropriateness of future rental assistance and supportive services that best meets the family's needs as outlined in the SDHC Admin Plan.
- FY 2020: Activity was re-proposed, broadens the initiative to allow for permanent supporting housing as required.
- FY 2018: Activity now utilizes the Coordinated Entry System (CES) for programmatic referrals.

**PLANNED NON-SIGNIFICANT CHANGES:** None  
**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None  
**PLANNED SIGNIFICANT CHANGES:** None

**2015-1. MODIFY THE 40 PERCENT RENT BURDEN REQUIREMENT**

**PLAN YEAR: 2015  
RE-PROPOSED: N/A**

**DESCRIPTION**

Modifies the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households.

**PLANNED NON-SIGNIFICANT CHANGES:** None  
**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None  
**PLANNED SIGNIFICANT CHANGES:** None

**2014-2. LOCAL INCOME INCLUSION**

**PLAN YEAR: 2014  
RE-PROPOSED: N/A**

**DESCRIPTION**

Income from Kin-GAP, foster care payments, and adoption assistance payments is included in the determination of the household's annual adjusted income. The activity utilizes waivers allowing for an alternate rent calculation methodology.

**PLANNED NON-SIGNIFICANT CHANGES:** None  
**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None  
**PLANNED SIGNIFICANT CHANGES:** None





**IMPLEMENTED ACTIVITIES**

<p><b>2013-6. TRANSITIONAL PROJECT-BASED SUBSIDIES FOR THE HOMELESS</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2013 RE-PROPOSED: N/A</b></p>
	<p>Utilizing Broader Uses of Funds Authority, SDHC partners with agencies to craft a transitional housing program using project-based subsidies paired with supportive services, offered by the selected provider agency. SDHC is currently partnering with PATH, Episcopal Community Services, and Senior Community Center in this endeavor.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2022: SDHC revised the maximum subsidy to be aligned with the HCV housing assistance payments per unit cost (PUC) per bed, and this may be adjusted periodically to account for rising costs of administering the program including, but not limited to, rising rental costs.</li> <li>• FY 2020: A modified alternate HQS policy will be used for the beds funded through the program.</li> <li>• FY 2017: The target populations are expanded to include homeless veterans and victims of human trafficking.</li> <li>• FY 2016: Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. The maximum subsidy is \$700 per bed. The target populations are expanded to include homeless veterans and victims of human trafficking.</li> <li>• FY 2015: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> Project-based subsidy for these programs will be awarded on a competitive basis. The exception will be if the program is housed in an SDHC-owned and/or SDHC-controlled development (for example long-term, master lease), in which case the subsidy will be awarded non-competitively, per a prior HUD-approved MTW activity.</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2013-4. PUBLIC HOUSING: FLAT RENT ELIMINATION</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2013 RE-PROPOSED: N/A</b></p>
	<p>Eliminate flat rents in public housing in order to facilitate the implementation of Path to Success for public housing residents. The activity utilizes waivers allowing SDHC to determine alternative rent policies within the public housing program.</p>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2013-2. FAMILY SELF-SUFFICIENCY REINVENTION</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2013 RE-PROPOSED: 2015</b></p>
	<p>Modifies the Family Self-Sufficiency (FSS) program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program include a \$10,000 maximum on total escrow accumulation, escrow deposits based on outcomes achieved, and a two-year contract term with the option to extend the contract an additional three years if additional time is needed to attain goals.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2022: HUD published the FSS Program Final Rule effective June 16, 2022. SDHC adopted the final rule, but will keep the flexibilities approved under the existing MTW FSS Program Activity.</li> <li>• FY 2015: Activity was re-proposed to allow an adult household member to enroll in the program as the sole participant</li> <li>• FY 2014: The FSS Action Plan detailing the flat escrow deposit feature of the program is pending submission to HUD for approval. The flat escrow deposit schedule containing the outcomes and the corresponding deposit amounts will be further described in the Fiscal Year 2013 MTW Annual Report.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	



## IMPLEMENTED ACTIVITIES

### 2013-1. MTW VASH PROGRAM

PLAN YEAR: 2013  
RE-PROPOSED: N/A

**DESCRIPTION**

Program features include the elimination of minimum rent for an initial time period, streamlined criminal history requirements for household members, and additional streamlining measures implemented using differing rent calculation and eligibility methodologies. On April 1, 2020, SDHC received approval to have VASH payment standards tied to 120% of the three Choice Communities payment standards.

*Prior Updates*

- FY 2023 – To support ongoing housing stabilization for VASH clients, SDHC extended the \$0 minimum rent requirement.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None

**PLANNED SIGNIFICANT CHANGES:** None

### 2012-3. MODIFY FULL-TIME STUDENT DEFINITION

PLAN YEAR: 2012  
RE-PROPOSED: N/A

**DESCRIPTION**

Modifies the full-time student definition to include only students ages 18 to 23 who are not the head, spouse, or co-head. Household members meeting the revised full-time student definition will receive a 100 percent employment income exclusion. All students, regardless of age or familial status, will be eligible for a graduation incentive wherein proof of graduation can be submitted in exchange for a monetary award. The activity utilizes waivers allowing SDHC to calculate rent using alternative methodologies.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None

### 2012-2. BIENNIAL REEXAMINATION SCHEDULE

PLAN YEAR: 2012  
RE-PROPOSED: N/A

**DESCRIPTION**

A biennial reexamination schedule for the Work-Able and Elderly/Disabled population implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.

*Prior Updates*

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: SDHC converted the Elderly/Disabled population to a Biennial Reexamination Schedule effective July 1, 2015.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2012-1. PATH TO SUCCESS

**PLAN YEAR:** 2012  
**RE-PROPOSED:** 2014, 2019, 2024

#### DESCRIPTION

A comprehensive rent reform model utilizing a tiered rent structure with progressive increases to minimum rents. The model eliminates deductions and streamlines allowances. Path to Success only applies to families considered Work-Able. Families defined as Elderly/Disabled receive streamlining measures and are not subject to Path to Success. Rent reform model includes the income verification method of reviewing and averaging the last two month's of income verification via the Verification hierarchy and projecting the annual income based on this verification.

#### *Prior Updates*

- FY 2024: Activity was re-proposed to modify the age of elderly from 55 years to 62 years.
- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2019: The activity was re-proposed to increase minimum rents for Work-Able families and modify income bands to \$5,000 for all ranges.
- FY 2014: Re-proposed to include a local portability policy. The local portability policy component of the activity was implemented effective November 1, 2013. The standard HCV calculation may be used in PBV complexes servicing special needs populations.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** Metrics have been updated in the re-proposed activity description.

**PLANNED SIGNIFICANT CHANGES:** Path to Success has been re-proposed in the FY 2024 MTW Plan to include changes to utility allowance and household age designation.

### 2011-8. SPONSOR-BASED SUBSIDIES FOR THE HOMELESS

**PLAN YEAR:** 2011  
**RE-PROPOSED:** 2013, 2017

#### DESCRIPTION

The local, non-traditional program created using Broader Uses of Funds Authority provides subsidies to individuals identified as homeless. Program participants receive housing and supportive services from sponsor organizations. Update: The Churchill development was allocated 72 sponsor-based subsidies in lieu of project-based vouchers.

#### *Prior Updates*

- FY 2017: Re-proposed to streamline the subsidy calculation process using the Path to Success rent calculation, and expands the populations served including both individuals and families. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2017 Plan due to the re-proposal.
- FY 2016: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program. Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2013: Re-proposed to allow SDHC to allocate additional vouchers to the program, broaden the definition of homelessness, and apply MTW flexibilities to the rent calculation methodology.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

<p><b>2011-7.</b> <b>DEVELOPMENT OF PUBLIC HOUSING UNITS USING A COMBINATION OF FUNDS.</b></p>	<p><b>DESCRIPTION</b> SDHC creates/preserves public housing, without a competitive process, using acquisition and rehabilitation as the method of development.</p> <p><i>Prior Updates</i></p> <ul style="list-style-type: none"> <li>• FY 2014: Waivers corrected in the Fiscal Year 2012 Report to include MTW Agreement Attachment C, Section B(1)(b)(ii), B(1)(b)(vii) and B(1)(b)(viii) containing waivers of Sections 8 and 9(g)(3) of the 1937 Act and 24 CFR 982 and 990. MTW Agreement Attachment C, Section C (13) containing waivers of 24 CFR 941.40.</li> <li>• FY 2013: This initiative was combined with the Fiscal Year 2010 Public Housing Development activity.</li> </ul> <p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None  <b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None  <b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	<p><b>PLAN YEAR:</b> 2011 <b>RE-PROPOSED:</b> N/A</p>
<p><b>2011-6. MODIFY EIV INCOME REVIEW SCHEDULE</b></p>	<p><b>DESCRIPTION</b> SDHC utilizes the EIV report only when processing full reexaminations of household composition, income, and assets according to the Biennial reexamination cycles. Waivers allow SDHC to adopt and implement policies for verifying family income and determining resident eligibility differing from current program requirements. The requirement to use the EIV report during interim certifications is eliminated.</p> <p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None  <b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.  <b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	<p><b>PLAN YEAR:</b> 2011 <b>RE-PROPOSED:</b> N/A</p>
<p><b>2011-4.</b> <b>AFFORDABLE HOUSING DEVELOPMENT</b></p>	<p><b>DESCRIPTION</b> Uses Broader Uses of Funds Authority to acquire affordable housing units in San Diego using MTW funds.</p> <p><i>Prior Updates</i></p> <ul style="list-style-type: none"> <li>• SDHC continues to explore viable opportunities to create affordable housing.</li> <li>• FY 2022: Any income that is generated from SDHC-owned properties developed through this initiative will be used for MTW-approved purposes like affordable housing.</li> <li>• FY 2021: Any income that is generated from SDHC-owned properties developed through this initiative will be used for affordable housing purposes.</li> <li>• FY 2020: SDHC is utilizing the initiative to develop accessory dwelling units (ADUs) per local ordinances to increase affordable housing options in the City of San Diego.</li> <li>• FY 2014: Re-proposed to expand the methods of affordable housing development available to SDHC.</li> <li>• FY 2012: Clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego.</li> </ul> <p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None  <b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None  <b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	<p><b>PLAN YEAR:</b> 2011 <b>RE-PROPOSED:</b> 2014</p>



## IMPLEMENTED ACTIVITIES

### 2011-3. TWO YEAR OCCUPANCY TERM FOR PBV TENANTS

PLAN YEAR: 2011  
RE-PROPOSED: 2013

**DESCRIPTION**

Requires Project-Based Voucher holders to complete two years of occupancy before becoming eligible to receive a tenant-based voucher. Waivers allow SDHC to determine waiting list procedures differing from current program requirements. The Mason Hotel and Parker-Kier contracts contain this requirement.

*Prior Updates*

- FY 2016: The Fiscal Year 2012 Report increased the threshold of the vacancy policy from 15% to 35%, a percent consistent with the baseline vacancy rate. The policy change benefits PBV households.
- FY 2013: Re-proposed to allow SDHC to create a policy stating, "No more than 15% of the tenants in any given development who become eligible to transition to a tenant-based voucher in any given year and no more than 10% in any given month can move from the PBV assisted complex. Policy change effective 2/1/2014.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None

### 2011-2. AUTHORIZE COMMITMENT OF PBV TO SDHC-OWNED UNITS

PLAN YEAR: 2011  
RE-PROPOSED: N/A

**DESCRIPTION**

Streamlines the process of committing PBV to agency-owned units by using waivers to allow SDHC to project-base units utilizing a non-competitive process.

*Prior Updates*

- FY 2015: PBV units were added to the Mason Hotel and Parker-Kier, developments owned by SDHC.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None

### 2011-1. ALLOW LOWER RENTS FOR NON-ASSISTED UNITS IN SDHC OWNED DEVELOPMENTS

PLAN YEAR: 2011  
RE-PROPOSED: N/A

**DESCRIPTION**

Uses a revised rent reasonableness protocol to determine rent reasonableness for assisted units in developments owned by SDHC. Rent reasonableness for the voucher assisted units is determined by comparisons to similar units in the surrounding neighborhoods rather than within the development.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2010-9. EXPAND THE PROJECT-BASED VOUCHER PROGRAM

PLAN YEAR: 2010  
RE-PROPOSED: 2015

#### DESCRIPTION

SDHC allocates a greater percent of budget authority to project-based vouchers to serve persons experiencing homelessness and low-income households in the City of San Diego. Authorizations waived allow SDHC to project-base 100 percent of the units in a development; create project-specific waitlists; utilize creative measures to allocate PBV in vacant and foreclosed properties; and designate greater than 20 percent of SDHC's allocation to PBV.

#### *Prior Updates*

- FY 2022: New PBV developments focused on Permanent Supportive Housing (PSH) may use Certificates of Occupancy or Temporary Certificates of Occupancy in lieu of an HQS inspections for units. This allows for inspections that have been performed for satisfying Tax Credit or HOME program requirements, as well as inspections by other governmental agencies that are substantially equivalent to HQS requirements. Subsequent inspections shall follow the standard biennial HQS process.
- FY 2021: SDHC changed the rent change period from HAP anniversary month to reexamination month. This will further streamline the process by allowing rent increases to be processed concurrently with the reexamination on the optimized reexamination effective date
- FY 2015: Re-proposed to adopt additional flexibilities to require residents to participate in supportive services as a condition of tenancy; allow project-specific waiting lists maintained by the owners or non-profit providers; approve exception payment standards exceeding 110 percent of the FMR without requiring HUD approval; and increase the number of designated PBV units in a contract after the first three years of the contract have elapsed.

**PLANNED NON-SIGNIFICANT CHANGES:** In alignment with national best practice and housing first principles, engagement in supportive services is not a condition of tenancy. However, project-based programs that serve special populations are expected to make available a variety of supportive services to best meet a specific population's needs. These expectations are memorialized in contract documents.

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2010-7. ADOPT A LOCAL INTERIM CERTIFICATION POLICY

PLAN YEAR: 2010  
RE-PROPOSED: 2012

#### DESCRIPTION

The local interim policy applies to non-elderly/non-disabled households and limits the number of interim adjustments to income to once in a 12-month timeframe. Additionally, decrease of income interims will be granted only if the loss of income is through no fault of the family, the decreased income results in a decrease to the rent portion greater than 20 percent, the decrease is not due to a sanction on public assistance income, and the family provides verification of eligibility or ineligibility for unemployment benefits if the reduced income is due to loss of employment. If it is determined that a reduction of rent is warranted, the reduced rent will begin the first of the month after receipt of all verifications of decrease and any replacement income.

In order to hold elderly and disabled households harmless, including VASH and EHV, these households may continue to report income decreases as they occur. If the income reduction will last 90 days or more and the reduction of rent is warranted, the reduced rent will begin effective the first of the following month after all verifications are received.

For all households:

When a change of family composition is reported in a timely manner, the effective date of the rent portion changes are as follows:

- Income of newly added household members will be included and increases in the tenant rent due to family changes are effective on the first of the next month, after at least 30- days' notice to the family.
- Decreases in the tenant rent are effective the first of the month following the month in which verifications are received.

When the family composition change is not reported timely by the family, or when there is a mandatory reporting requirement for an income change and it is not reported timely, the effective date of the rent portion changes are as follows:

- Income of newly added household members will be included and the increase in tenant rent will be effective retroactive to the date it would have been effective had it been reported in a timely manner. The family will be liable for any overpaid HAP and may be required to sign a repayment agreement or make a lump sum payment.
- Decreases in tenant rent will be effective on the first of the month following the month that all verifications are received.

#### *Prior Updates*

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2018: Effective July 1, 2018, SDHC eliminated the "No Fault of Your Own" policy as a reason to deny an interim request for a decrease in the rent portion. A review and analysis of the policy indicated minimal benefits.
- FY 2015: The policy applies to work-able families as defined under Path to Success. The activity utilizes the authority to implement an interim certification protocol differing from current mandates, thus allowing for locally driven policies concerning income change interims for families categorized as "Work-Able".
- FY 2012: Re-proposed to adopt a policies stating an interim adjustment of income will not be processed unless the change to the rent portion is greater than 20% and the loss of income must not occur through fault of the family. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2012 Plan Amendment due to the re-proposal.

**PLANNED NON-SIGNIFICANT CHANGES:** None

**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

**PLANNED SIGNIFICANT CHANGES:** None



**IMPLEMENTED ACTIVITIES**

<p><b>2010-6. SIMPLIFY INCOME AND ASSET VERIFICATION SYSTEMS TO REDUCE ADMINISTRATIVE BURDEN</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2010</b> <b>RE-PROPOSED: 2016</b></p>
	<p>Restructures the verification hierarchy, and assets valued at less than \$10,000 are not verified. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements. At admission and subsequent reexaminations, SDHC accepts self-certification if participant or applicant declares assets to be less than \$100,000 and that they do not own a home suitable for occupancy by the participant or applicant, third-party verification is not required. SDHC also accepts documents provided by applicants and participants without requiring third-party verification at admission or subsequent reexaminations.</p>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2016: Re-proposed to eliminate assets from the verification and rent calculation process, gain the ability to deny program admission to applicants owning homes, and incorporate activity 2011-5 into the initiative.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2010-5. STANDARDIZE UTILITY ALLOWANCES BY UNIT SIZE</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2010</b> <b>RE-PROPOSED: N/A</b></p>
	<p>A simplified utility allowance structure where the utility allowance amount is based on whether or not the family is responsible for the water portion of the utilities. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements.</p>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> SDHC proposes to eliminate utility reimbursement payments and the utility allowance schedule requirement and remove the requirement to collect, analyze, and report information on utility responsibilities for all households participating in Path to Success.</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	
<p><b>2010-4. CHOICE COMMUNITIES</b></p>	<p><b>DESCRIPTION</b></p>	<p><b>PLAN YEAR: 2010</b> <b>RE-PROPOSED: 2012, 2018</b></p>
	<p>Using the authority to implement a reasonable policy to establish payment standards differing from current program requirements, the poverty de-concentration effort providing incentives for families to move to one of nine local opportunity areas by using the following:</p>	
	<ol style="list-style-type: none"> <li>1. Moving for Opportunity Program</li> <li>2. Revolving Security Deposit Loan fund</li> <li>3. Increase payment standards in low-poverty areas</li> </ol>	
	<p><i>Prior Updates</i></p>	
	<ul style="list-style-type: none"> <li>• FY 2018: Re-proposed to increase flexibility related to determining payment standards. Payment standards are informed by hypothetical SAFMRs published by HUD, the information available at the time of the analysis.</li> <li>• FY 2016: A Fiscal Year 2015 activity increased the rent burden to 50 percent program wide. Thus, the component eliminating the 40 percent rent burden is eliminated.</li> <li>• FY 2012: Re-proposed to adopt a policy allowing SDHC to calculate payment standards below 90% of the FMR in high-poverty areas.</li> </ul>	
	<p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None</p>	
	<p><b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> None</p>	
	<p><b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	





**IMPLEMENTED ACTIVITIES**

<p><b>2010-2.</b>  <b>AUTHORIZE THE SDHC TO INSPECT AND DETERMINE RENT REASONABLENESS FOR SDHC OWNED PROPERTIES</b></p>	<p><b>DESCRIPTION</b>                  Utilizes a local procedure to conduct inspections and determine rent reasonableness for SDHC-owned properties are conducted by SDHC.</p> <p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None  <b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.  <b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	<p><b>PLAN YEAR:</b> 2010  <b>RE-PROPOSED:</b> N/A</p>
<p><b>2010-1.</b>  <b>IMPLEMENT A REVISED INSPECTION PROTOCOL</b></p>	<p><b>DESCRIPTION</b>                  The modified inspection protocol reduces the number of required inspections by placing qualifying units on a Biennial Inspection Cycle and allowing owners to self-certify Housing Quality Standards for minor fail items.</p> <p><i>Prior Updates</i></p> <ul style="list-style-type: none"> <li>• FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.</li> <li>• FY 2016: Through the initiative, SDHC will modify the requirements to "gain entry" into every 24 months to make a "first attempt to access" the unit every 24 months to comply with Federal requirements.</li> <li>• FY 2015: Modified the activity to remove the qualifying criteria and authorize placement of all MTW units onto a Biennial Inspection Cycle.</li> <li>• FY 2014: Results for HQS inspections occurring before implementation of the activity may not be considered for purposes of placement on the biennial inspection cycle.</li> </ul> <p><b>PLANNED NON-SIGNIFICANT CHANGES:</b> None  <b>PLANNED CHANGES TO METRICS / DATA COLLECTION:</b> The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.  <b>PLANNED SIGNIFICANT CHANGES:</b> None</p>	<p><b>PLAN YEAR:</b> 2010  <b>RE-PROPOSED:</b> N/A</p>



**NOT YET IMPLEMENTED ACTIVITIES**

<b>2023-1. BLENDED SUBSIDIES IN FAIRCLOTH-TO-RAD CONVERSIONS</b>	<p><b>DESCRIPTION</b></p> <p>SDHC received permission for blended subsidies using MTW funds for Faircloth to RAD conversions. SDHC has been actively involved in creating and preserving additional affordable housing within the City of San Diego in other approved MTW activities through acquisitions, rehabilitations, and new developments. In addition, SDHC has an active activity relating to public housing development. Documentation from the PIH office of Capital Improvements, as of September 30, 2021, showed that SDHC had an availability of 1,220 units remaining under the Faircloth limit. Due to the remaining units in SDHC’s Faircloth cap, SDHC is actively researching opportunities where a Faircloth-to-RAD conversion would be feasible. This activity would be utilized to make up the difference between the combined tenant paid portion and the RAD HAP subsidy up to the contract rent for converted units.</p> <p><b>IMPLEMENTATION DATE TIMELINE:</b> None</p> <p><b>STATUS UPDATE:</b> SDHC is actively reviewing options to implement this activity.</p> <p><b>DESCRIPTION OF NON-SIGNIFICANT CHANGES/MODIFICATIONS SINCE APPROVAL:</b> None</p>	<p><b>PLAN YEAR APPROVED:</b> 2023</p> <p><b>RE-PROPOSED:</b> N/A</p>
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**ACTIVITIES ON HOLD**

<b>2010-8. ESTABLISH AN HCV HOMEOWNERSHIP PROGRAM</b>	<p><b>PLAN YEAR APPROVED:</b> 2010</p> <p><b>RE-PROPOSED:</b> N/A</p> <p><b>DESCRIPTION</b></p> <p>A homeownership program was created to assist income-eligible HCV participants with purchasing a home. Housing assistance payments are utilized to assist with a mortgage payment rather than as a rental payment. Incentives to purchase a foreclosed home are also program components. Waivers were enacted to modify the eligibility requirements for the program related to the minimum monetary threshold for savings accounts as well as implement the incentives for purchasing foreclosed homes.</p> <p><b>REASON PLACED ON HOLD</b></p> <p>The program was placed on hold due to decreasing housing stock and the resulting increasing housing prices, thus creating a housing market no longer accessible to low-income Housing Choice Voucher participants. New applications were no longer be accepted effective July 1, 2014 for the program. Families currently participating in the homeownership program continue to receive assistance.</p> <p><b>STATUS UPDATE:</b> None</p> <p><b>ANTICIPATED REACTIVATION TIMELINE</b></p> <p>SDHC will evaluate the program annually to determine the feasibility of re-activating the program. Criterion to be evaluated will include the level of available housing stock, median housing prices, and the administrative capacity to increase the number of Housing Choice Voucher homeowners.</p> <p><b>EXPLANATION OF NON-SIGNIFICANT CHANGES / MODIFICATIONS:</b> Not Applicable</p>	<p><b>IMPLEMENTATION DATE:</b> OCT 01, 2009</p> <p><b>HOLD DATE:</b> JUL 01, 2014</p>
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**CLOSED OUT ACTIVITIES**

2014-4. Housing Subsidy Program for Homeless Youth..... 34

2014-1. Transitional Subsidy Program for Homeless Veterans..... 34

2013-9. New Public Housing Transition ..... 34

2013-5. Homeless Veteran Project-Based Subsidy Program ..... 34

2013-3. Elimination of 100% Excluded Income from the Income Verification Process ..... 34

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2011-10. Broader Uses of Funds for IDAs ..... 35

2011-9. Enhance Family Self-Sufficiency Program ..... 35

2011-5. Disregard Retirement Accounts..... 35

2010-10. Undertake Public Housing Development..... 35

2010-3. Triennial Reexaminations for Elderly and Disabled Households ..... 35

2009-1. Achievement Academy of the San Diego Housing Commission ..... 36



## CLOSED OUT ACTIVITIES

<b>2014-4. HOUSING SUBSIDY PROGRAM FOR HOMELESS YOUTH</b>	<b>PLAN YEAR APPROVED:</b> 2014 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION</b> Using Broader Uses of Funds Authority, SDHC created a time-limited pilot program to provide flat housing subsidies while a partnering agency delivers supportive services such as job placement, education, training, and case management.  <b>REASON(S) CLOSED OUT</b> The activity was not implemented. SDHC published several competitive solicitations to procure a partner agency without success. Due to the inability to award a contract, SDHC closed out the activity.	<b>IMPLEMENTATION DATE:</b> N/A <b>DATE CLOSED OUT:</b> JULY 1, 2022
<b>2014-1. TRANSITIONAL SUBSIDY PROGRAM FOR HOMELESS VETERANS</b>	<b>PLAN YEAR APPROVED:</b> 2014 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION</b> Using Broader Uses of Funds Authority, SDHC partners with Veteran's Village of San Diego (VVSD) to craft a transitional housing program using flat subsidies paired with supportive services. SDHC provides the housing subsidy while VVSD provides the supportive services.  <b>REASON(S) CLOSED OUT</b> Veteran's Village of San Diego, the intended partnering agency for the program, indicated a preference to pursue an alternative rental subsidy program.	<b>IMPLEMENTATION DATE:</b> JAN 01, 2014 <b>DATE CLOSED OUT:</b> OCT 01, 2014
<b>2013-9. NEW PUBLIC HOUSING TRANSITION</b>	<b>PLAN YEAR APPROVED:</b> 2013 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION</b> Families transitioning out of a state-aided rental assistance program (25% TTP) to the public housing program (30% TTP) receive a transition period during which the families pay more than 25 percent but less than 30 percent of adjusted household income toward the rent portion before moving to 30 percent at the end of the transition period.  <b>REASON(S) CLOSED OUT</b> The flexibility requested under this initiative will not be required.	<b>IMPLEMENTATION DATE:</b> N/A <b>DATE CLOSED OUT:</b> SEP 30, 2013
<b>2013-5. HOMELESS VETERAN PROJECT- BASED SUBSIDY PROGRAM</b>	<b>PLAN YEAR APPROVED:</b> 2013 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION</b> Creates a local, non-traditional project-based subsidy pilot program to provide housing to veterans who are either not yet ready to enter a more regulated program or who temporarily exit a program. SDHC partners with Veteran's Village of San Diego for this activity.  <b>REASON(S) CLOSED OUT</b> Veteran's Village of San Diego determined the activity as neither economically advantageous nor viable under current circumstances and requested permission to close out the activity.	<b>IMPLEMENTATION DATE:</b> N/A <b>DATE CLOSED OUT:</b> SEP 30, 2013
<b>2013-3. ELIMINATION OF 100% EXCLUDED INCOME FROM THE INCOME VERIFICATION PROCESS</b>	<b>PLAN YEAR APPROVED:</b> 2013 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION</b> Removes the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058.  <b>REASON(S) CLOSED OUT</b> Activity had originally been reactivated due to the expiration of PIH Notice 2013-03. A Final Rule FR 5743-F-03 was published, reactivating the streamlining measure.	<b>IMPLEMENT DATE:</b> SEP 01, 2012 <b>DATE CLOSED OUT:</b> JULY 01, 2020

## SECTION IV – APPROVED MTW ACTIVITIES



<b>2012-4. PROJECT-BASED SUBSIDY PROGRAM FOR THE HOMELESS</b>	<b>PLAN YEAR APPROVED:</b> 2012 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> N/A <b>DATE CLOSED OUT:</b> DEC 31, 2014
	<b>DESCRIPTION</b> Using Broader Uses of Funds Authority, SDHC created a program which provides a flat subsidy based on the number of authorized units in the development; all program administration is performed by the development owner with monitoring and auditing performed by SDHC.	
	<b>REASON(S) CLOSED OUT</b> SDHC determined the program structure as not advantageous to the agency's approach to ending homelessness on the City of San Diego. Efforts are focused in other development capacities.	
<b>2011-10. BROADER USES OF FUNDS FOR IDAs</b>	<b>PLAN YEAR APPROVED:</b> 2011 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> JUL 01, 2010 <b>DATE CLOSED OUT:</b> JUN 30, 2011
	<b>DESCRIPTION</b> SDHC received permission to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.	
	<b>REASON(S) CLOSED OUT</b> The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority, but rather single-fund flexibility. The activity is no longer active.	
<b>2011-9. ENHANCE FAMILY SELF-SUFFICIENCY PROGRAM</b>	<b>PLAN YEAR:</b> 2011 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> OCT 01, 2010 <b>DATE CLOSED OUT:</b> JUL 01, 2014
	<b>DESCRIPTION</b> In the event the head of household is unable to enroll in the FSS program (such as due to a disability), an adult household member may enroll in the program as the sole participant.	
	<b>REASON(S) CLOSED OUT</b> Per HUD's recommendation, the initiative will be combined with the FSS Reinvention activity via a re-proposal in the Fiscal Year 2015 MTW Annual Plan.	
<b>2011-5. DISREGARD RETIREMENT ACCOUNTS</b>	<b>PLAN YEAR:</b> 2011 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> AUG 01, 2010 <b>DATE CLOSED OUT:</b> JUN 30, 2015
	<b>DESCRIPTION</b> SDHC disregards retirement accounts when verifying an applicant or participant's assets.	
	<b>REASON(S) CLOSED OUT</b> The re-proposal of activity 2010-6 wherein assets are eliminated from the rent calculation eliminates the need for the activity.	
<b>2010-10. UNDERTAKE PUBLIC HOUSING DEVELOPMENT</b>	<b>PLAN YEAR:</b> 2010 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> JUL 01, 2010 <b>DATE CLOSED OUT:</b> JUN 30, 2011
	<b>DESCRIPTION/UPDATE</b> Acquire, rehabilitate, or produce housing units as public housing.	
	<b>REASON(S) CLOSED OUT</b> This activity was closed out in the Fiscal Year 2011 MTW Report. Public Housing development will occur under the Fiscal Year 2011 Public Housing Development initiative which combines the authorizations and flexibilities.	
<b>2010-3. TRIENNIAL REEXAMINATIONS FOR ELDERLY AND DISABLED HOUSEHOLDS</b>	<b>PLAN YEAR:</b> 2010 <b>RE-PROPOSED:</b> N/A	<b>IMPLEMENTATION DATE:</b> OCT 01, 2009 <b>DATE CLOSED OUT:</b> JUL 01, 2015
	<b>DESCRIPTION/UPDATE</b> Allows families defined as Elderly/Disabled to participate in a Triennial Reexamination Cycle. COLA updates to social security and veteran's benefits are processed in the "off" years. The activity was implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.	
	<b>REASON(S) CLOSED OUT</b> SDHC closed out the activity to streamline the reexamination process for Path to Success participants and rental assistance staff. Multiple reexamination processes for households proved difficult to administer when population changes occurred between Work-Able and Elderly/Disabled households. Path to Success households are placed on a biennial reexamination process effective with July 2015 reexamination. The PBV and FUP programs remain on an annual reexamination cycle.	



<p><b>2009-1.</b> <b>ACHIEVEMENT</b> <b>ACADEMY OF THE</b> <b>SAN DIEGO</b> <b>HOUSING</b> <b>COMMISSION</b></p>	<p><b>PLAN YEAR:</b> 2009 <b>RE-PROPOSED:</b> N/A <b>DESCRIPTION/UPDATE</b> The SDHC Achievement Academy, formerly known as the Economic Development Academy, offers a broad range of one-on-one services and workshops geared toward workforce preparation, financial literacy, and homeownership education. <b>REASON(S) CLOSED OUT</b> The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority. The activity is ongoing but reported as a single fund flexibility activity in Section 5 of the Plan</p>	<p><b>IMPLEMENTATION DATE:</b> OCT 01, 2010 <b>DATE CLOSED OUT:</b> JUN 30, 2011</p>
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## SECTION V – SOURCES AND USES OF MTW FUNDS

### ESTIMATED SOURCES AND USES OF MTW FUNDS

#### I. ESTIMATED SOURCES OF MTW FUNDS

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	TOTAL TENANT REVENUE	\$0
70600	HUD PHA OPERATING GRANTS	\$297,223,800
70610	CAPITAL GRANTS	\$0
70700 (70710+70720+70730+70740+70750)	TOTAL FEE REVENUE	\$0
71100+72000	INTEREST INCOME	\$0
71600	GAIN OR LOSS ON SALE OF CAPITAL ASSETS	\$0
71200+71300+71310+71400+71500	OTHER INCOME	\$10,710,566
<b>70000</b>	<b>TOTAL REVENUE</b>	<b>\$307,934,366</b>

#### II. ESTIMATED USES OF MTW FUNDS

The MTW PHA shall provide the estimated uses and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	TOTAL OPERATING - ADMINISTRATIVE	\$14,965,627
91300+91310+92000	MANAGEMENT FEE EXPENSE	\$0
91810	ALLOCATED OVERHEAD	\$10,691,438
92500 (92100+92200+92300+92400)	TOTAL TENANT SERVICES	\$1,085,728
93000 (93100+93600+93200+93300+93400+93800)	TOTAL UTILITIES	\$0
93500+93700	LABOR	\$0
94000 (94100+94200+94300+94500)	TOTAL ORDINARY MAINTENANCE	\$996
95000 (95100+95200+95300+95500)	TOTAL PROTECTIVE SERVICES	\$2,075
96100 (96110+96120+96130+96140)	TOTAL INSURANCE PREMIUMS	\$258,679
96000 (96200+96210+96300+96400+96500+96600+96800)	TOTAL OTHER GENERAL EXPENSES	\$16,210,808
96700 (96710+96720+96730)	TOTAL INTEREST EXPENSE AND AMORTIZATION COST	\$0
97100+97200	TOTAL EXTRAORDINARY MAINTENANCE	\$0
97300+97350	HOUSING ASSISTANCE PAYMENTS + HAP PORTABILITY-IN	\$264,719,015
97400	DEPRECIATION EXPENSE	\$0
97500+97600+97700+97800	ALL OTHER EXPENSES	\$0
<b>90000</b>	<b>TOTAL EXPENSES</b>	<b>\$307,934,366</b>

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

#### III. DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

SDHC utilizes single-fund flexibility to fund the Achievement Academy and to provide funding for services in support of the Community Action Plan on Homelessness and the SDHC Housing Intervention Continua. The Achievement Academy is a learning and skills center available to families participating in the Housing Choice Voucher and Public Housing programs. Programs offered at the Achievement Academy are geared to workforce readiness and financial literacy. The Family Self-Sufficiency program is another component of the Achievement Academy. Please note: Individual Development Accounts are no longer funded with MTW single-fund flexibility. Please see the following pages for a thorough discussion of each activity.



**SINGLE FUND FLEXIBILITY NARRATIVE**

**ENVISION CENTER DEMONSTRATION PROGRAM**

In June of 2018, HUD announced the designation of EnVision Centers in 17 communities across the nation. SDHC was selected for the only location in California, and only one of three co-located within a designated Promise Zone.

Initially implemented with two locations to provide client flexibility, the Southeast San Diego location closed due to the pandemic. The SDHC Achievement Academy location is temporarily closed to in-person participation while staff members continue to work remotely. In response to the COVID-19 pandemic, the SDHC Achievement Academy began offering meetings and workshops by video conference. The change in service delivery made programs more accessible and convenient for many clients, resulting in increased participation in workshops and programmatic events. Services continue to be offered online, with some activities available at alternate in-person sites, such as local libraries or specific program training locations. EnVision Center services are available to any households with low income in the City of San Diego, predominately SDHC rental assistance participants, public housing residents and participants in certain homelessness programs.

EnVision Centers leverage public and private resources to help clients achieve goals to secure economic security. To foster long-lasting self-sufficiency, EnVision Centers provide support in the following four areas of focus: Economic Empowerment; Education; Health/Wellness; and Character/Leadership.

**FAMILY SELF-SUFFICIENCY: EDEN HOUSING INC.**

In November 2020, the SDHC Achievement Academy signed a contract with Eden Housing, Inc., a California nonprofit public benefit corporation, to implement a Family Self-Sufficiency (FSS) program at two of its San Diego properties. This marks the first time HUD has authorized a public housing authority to run an FSS program for a private multifamily developer. The FSS program will operate under HUD’s guidelines for the traditional five-year program and not the Achievement Academy’s MTW approved two-year program.

**ACHIEVEMENT ACADEMY**

SDHC uses single-fund flexibility in support of MTW activities to enhance self-sufficiency programming. SDHC combines funds from public housing operating and capital fund assistance (authorized by section 9 of the United States Housing Act of 1937 [the Act]) and voucher funds (authorized by section 8 (o) of the Act) to implement a block grant/single-fund budget approach to budgeting and accounting. SDHC has consolidated public housing and HCV program funds to implement the approved Moving to Work initiatives described in previously approved MTW Plans and will continue to do so in future Plans.

SDHC uses single-fund flexibility to conduct a variety of activities geared toward self-sufficiency. The Achievement Academy offers a broad range of one-on-one services and workshops geared toward workforce readiness and financial literacy. Partnerships with a variety of external organizations specializing in their fields enable SDHC to provide assistance to participants with different interests, career focuses, and skill levels. Leveraging funding from outside sources increases the services provided to participants. When possible, staff looks for grants that provide funding and coaching to assist both staff and participants. Following the Financial Opportunity Center (FOC) model, created by funding from the Local Initiatives Support Corporation (LISC), the Achievement Academy is able to provide robust services to participants that go beyond job leads and help support self-sufficiency. The resources offered at the Achievement Academy are a vital component of the Path to Success rent reform activity as participants are incentivized to increase income and work towards self-sufficiency. SDHC plans to continue and grow these partnerships to better serve our families and increase economic self-reliance. The narrative below describes some of the services offered at the Achievement Academy.

It is worth noting that while the COVID-19 pandemic temporarily disrupted and altered the Achievement Academy’s service delivery model, it did not prevent services from reaching clients in new and creative ways. Like most businesses across the country and elsewhere, SDHC Achievement Academy staff quickly reworked in-person meetings and workshops to Zoom or other online platforms. The change in service delivery proved to be more accessible and convenient for many clients resulting in increased participation in workshops and programmatic events.





### EMPLOYMENT/WORKFORCE DEVELOPMENT

#### Job Developer

One of the Achievement Academy Workforce Readiness Specialist (WRS) positions serves as a job developer and makes connections with employers of in-demand occupations; organizes job fairs; and coordinates employment services with partner organizations. Training for participants covers such topics as on-line job search, résumé writing, interviewing tips, and customer service. The Achievement Academy also partners with Manpower, an industry leader in employment services. Manpower helps to leverage connections in the business community to help open doors to companies that typically have been a struggle for participants to get into in the past.

#### One-Stop Career Center

The San Diego Workforce Partnership (SDWP) provides services via a satellite One-Stop Career Center at the local downtown public library. SDWP staff offers workforce development services including labor market information, career development, assessment, job search/retention skills, job placement assistance, and referrals to training opportunities.

#### Small Business Development Training

The SDHC Achievement Academy partners with Access to support entrepreneurs who want to start or expand a small business. Microenterprise services and training offered to clients include creating, or expanding, a business plan; obtaining a business license; one-on-one business counseling; market training & research; and financial literacy support among other services.

#### Employment/Workforce Development Workshops

The SDHC Achievement Academy offers employment readiness workshops and provides access to temporary and permanent employment through employer connections. Workshops include: Returning to the Workforce; The Job Search Rollercoaster; Teamwork Skills Everyone Needs; and 10 Keys for Professional Success among others. The Achievement Academy also hosts recruitment fairs via Zoom. Participants are invited to presentations from hiring organizations and hear directly from human resources representatives how to get hired at their company. Topics covered range from the job application and résumé submittal process to interview preparedness and communication skills. Many of the participating recruitment organizations guarantee, at minimum, an interview to SDHC clients.

#### Youth Programs

Staff at the Achievement Academy strives to offer innovative programming in an effort to keep participants interested and engaged. One WRS position focuses on developing programming for “opportunity youth”, defined as young adults between sixteen and twenty-four years of age who are not working and not enrolled in school. Students receive education counseling or career guidance. The Achievement Academy has partnered with Access, Inc. to provide additional training and services to these young adults.

#### Academy Computer Lab

The SDHC Achievement Academy computer lab is currently closed to in-person activity as staff continues to work remotely. During the early shutdown of the pandemic SDHC partnered with Computers2Kids to provide laptops to assist with digital access to SDHC families. This partnership, made possible with a grant from the Local Initiatives Support Corporation (LISC), allows families to participate in on-line school and job search activities. Currently, families are referred to local libraries where free Wi-Fi devices and equipment may be checked out.

### INCOME SUPPORTS

#### Benefits Screening

SDHC Achievement Academy staff work with clients on benefits screening. Application assistance is currently offered for an array of program such as CalWorks, Women Infants and Children (WIC), California Healthy Families, Child Care Assistance, MediCal, and Supplemental Nutrition Assistance Program (SNAP). Additionally, clients are referred to Dreams for Change for tax assistance programs.

### FINANCIAL EDUCATION

#### Financial Coaching

The Achievement Academy has been able to have several WRS positions trained as certified Financial Counselors. The Financial Counselors offer credit counseling in debt reduction, credit repair, budgeting, and cash management skills. These services have been incorporated into the FOC service delivery model utilized within the Achievement Academy.



**Financial Skills Education Workshops**

Financial Education workshops are routinely offered in the following topic areas: Debt and credit repair; credit score improvement; controlling expenses; maintaining a financial fitness plan; electronic banking and direct employee deposits; budget management, ordering, reviewing, and repairing credit report; investments strategies and options; and pensions/retirement planning.

**Financial Coaching Training**

SDHC WRS staff utilize the LISC Financial Counseling Model to implement innovative coaching methods during one-on-one appointments with participants. SDHC is also positioned to assist participants with improving credit through a partnership with Credit Builders Alliance. The ability to internally pull credit reports allows SDHC to further assist participants with accessing current credit ratings in order to begin aligning client goals for credit improvement to future financial and career goals.

The chart below contains a summary of the results of Achievement Academy activities at the close of Fiscal Year 2023.

<b>ACHIEVEMENT ACADEMY</b>			
<b>METRIC</b>	<b>BASELINE</b>	<b>OUTCOME</b>	<b>BENCHMARK ACHIEVED?</b>
Number of rental assistance participants receiving core services	982	1,156	Yes
Number of rental assistance participants with an increase in earnings	229	312	Yes
Number of rental assistance participants placed in employment	144	230	Yes
Number of rental assistance participants employed for 12 or more consecutive months	44	31	No
Number of rental assistance participants who attended a work readiness workshop	727	603	Yes
Percent of rental assistance participants who attended a recruitment and resource fair and obtained employment as a direct result	0%	25.7%	Yes
Number of rental assistance participants who completed vocational or bridge training	0	0	Yes

**FLEXIBLE FUNDING FOR SUPPORTIVE SERVICES**

In addition to the Achievement Academy, SDHC utilizes MTW funds to provide supportive services that would align with the City of San Diego’s Community Action Plan on Homelessness. The Community Action Plan on Homelessness identified a homeless-crisis-response-system service gap. Households can often present in significant crisis, and in the early stage of the crisis presentation it can be challenging to determine whether the homelessness/housing crisis is due to situational or structural factors/barriers in the household/individual. Flexible funding used towards supportive services, in this instance, help fund a central point of contact and centralized resources for households as they move between the various programs available.

Examples of supportive services that SDHC seeks to provide via flexible funding include, but are not limited to:

- Centralized Case Management
- Mental Health Services
- Physical Healthcare Services
- Behavioral Healthcare
- Substance Use Services



- Life Skills Training
- Education Services
- Employment Assistance
- HIV Services

This flexible supportive services approach creates individualized emergency intervention and housing planning for the household/individual to best meet the participant’s needs with a focus on aligning the right level of intervention with the critical need, promoting self-sufficiency and identifying the best resource to help participants thrive and overcome both situational and structural barriers to long-term housing stability.

For example, SDHC has drafted a Housing Intervention Continua, which delves into how at-risk populations can be served via centralized resources if funded via this proposed activity. The Continua contains multiple approved local non-traditional MTW activities, in which case management is operated separately. Currently, if a household moves from one program to another, this could necessitate a change in who their point of contact is. This continua could utilize flexible funding to focus on using centralized case management in order to help households more successfully navigate available programs, which includes Homeless Shelter Beds, Prevention and Diversion Programs, Moving Home, Sponsor-Based Subsidies, as well as the Achievement Academy and other approved programs. In this instance, centralized case management would remain with participating household from the beginning and continue with them in order to direct which program is most appropriate for their situation. Flexible funding would ensure that even if the household move into another housing program, their case management point of contact would remain with them until exit.

While funding for supportive services within the aforementioned Homeless Housing Continua could be an immediate use of the activity, it is expected that flexible funding for supportive services could also be used towards other households and programs eligible for assistance from SDHC. In addition, funding may be utilized to support administrative staff whose main job duties are to develop, monitor, or support efforts that align with this initiative and SDHC’s commitment to further progress towards goals of the Community Action Plan on Homelessness for the City of San Diego. Another potential application SDHC recently encountered occurred during an acquisition using CARES Act funding. While funding was available for the acquisition, the supportive services that were needed were not included. This, if approved, could be used to bridge similar gaps encountered in the acquisition and development process based on other funding sources used.

Another example could be providing assistance to households in obtaining broadband access that is increasingly necessary for education and remote work opportunities, this could include flexible funding for tenant-based households or the use of funds to provide high speed internet access at SDHC-owned and/or controlled properties. As a result of the COVID-19 pandemic, in the City of San Diego, there has been an expansion of remote learning opportunities that may persist for educational outreach after a return to in person classes. Remote learning and conferencing often requires video capabilities, which means that broadband access is required. Not all households have access to this resource, and flexible funding could help provide for households in need in order to prevent a long-term disadvantage. In addition, families with children that would have access would also help their parents or guardians in additional access to job search resources, as well as provide them the ability to work possibly work remotely.

Flexible funding would help to fund case management staff and financial assistance to stabilize a household’s immediate housing crisis. Coupled with financial assistance to address immediate needs, case management helps to minimize the negative impact of unstable housing for individuals and families who are at risk of or actively experiencing homelessness. Prevention and Diversion assistance is individualized to each household’s unique needs and stabilization activities may include:

- Short-term, light-touch case management
- Housing search assistance
- Financial literacy resources



- Workforce readiness resources
- Landlord/roommate conflict mediation
- Connection to services and/or public assistance benefits

### PREVENTION/DIVERSION

SDHC will utilize MTW flexible funds to provide services that reduce the inflow into the current homelessness system through prevention and diversion. Prevention and Diversion services strive to prevent homelessness before it occurs as well as to divert individuals who are experiencing homelessness to other housing opportunities outside of the region’s homeless crisis response system. Prevention and Diversion is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households at risk of or experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Preventing or shortening an episode of homelessness for individuals and families greatly reduces the likelihood of another occurrence of housing instability or progression to chronic homelessness. Further, these efforts also help minimize the impact for overburdened shelter systems in San Diego. In addition to supportive services through case management, Prevention and Diversion utilizes financial assistance in the form of rent, rent arrears, utility payments, security deposits and application fees to stabilize housing for individuals and families facing a housing crisis. Depending on the nature of the housing crisis being addressed through our Prevention and Diversion programs, SDHC may choose to use habitability checks in lieu of HQS inspections.

### LANDLORD ENGAGEMENT AND ASSISTANCE PROGRAM (LEAP)

SDHC will utilize MTW flexible funds to the Landlord Engagement and Assistance Program or LEAP, which aims to increase access to the existing market of available units for individuals and families experiencing homelessness. LEAP is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Depending on the nature of the housing crisis being addressed, SDHC may choose to use habitability checks in lieu of HQS inspections.

LEAP works directly with landlords and property management companies within the City of San Diego to help move individuals and families into housing quickly. LEAP offers incentives to landlords as well as the Landlord Contingency Fund and landlord liaison services. Flexible funding used towards LEAP services would help to fund a SDHC staff landlord liaison, support to individuals and families to identify housing units and financial assistance for them to pay move-in costs like security deposits including holding fees, application fees, utility assistance, rent arrears and vacancy loss.

## SECTION V – SOURCES AND USES OF MTW FUNDS



### IV. PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

ORIGINAL FUNDING SOURCE	BEGINNING OF FY – UNSPENT BALANCES	PLANNED APPLICATION OF PHA UNSPENT FUNDS DURING FY
HCV HAP*	\$26,861,326	\$26,861,326
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$1,321,109	\$1,321,109
<b>TOTAL:</b>	<b>\$28,182,435</b>	<b>\$28,182,435</b>

#### Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

SDHC anticipates HCV HAP unspent balance will be used to cover increased voucher costs due to utilization rate being greater than 100%; to cover program administration cost; to fund the acquisition, preservation, and renovation of affordable housing units in the City of San Diego; and to fund local non-traditional including homelessness programs costs.

Public Housing unspent fund balances are operating and replacement reserves related to SDHC regulatory agreement with the Department of Housing and Community Development, a public agency of the State of California, for public housing projects CA063000009 and CA063000010.

\* Unspent HAP funding should not include amounts recognized as Special Purpose Voucher reserves

\*\*HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan

### LOCAL ASSET MANAGEMENT PLAN

Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

Did the MTW PHA provide a LAMP in the appendix?

No

If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

SDHC did not operate a Local Asset Management Plan during Fiscal Year 2023

### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

#### 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 Description:

N/A

Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

N/A

If the MTW PHA has provided 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**

### **A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE**

See Appendix A

### **B. DOCUMENTATION AND PUBLIC PROCESS**

See Appendix B

### **C. PLANNED OR ONGOING EVALUATIONS**

There are no planned or ongoing evaluations

### **D. LOBBYING DISCLOSURES**

See Appendix C



# APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

## BOARD RESOLUTION

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**BOARD RESOLUTION**

**PAGE 2 OF 3**





**BOARD RESOLUTION**

**PAGE 3 OF 3**



**CERTIFICATIONS OF COMPLIANCE**

**PAGE 1 OF 2**



**CERTIFICATIONS OF COMPLIANCE**

**PAGE 2 OF 2**



## APPENDIX B: DOCUMENTATION OF PUBLIC PROCESS

### DOCUMENTATION OF PUBLIC PROCESS



**PUBLIC NOTICE – SAN DEIGO UNION TRIBUNE**



**PUBLIC NOTICE - SAN DIEGO VOICE**



**PUBLIC NOTICE – EL LATINO**



# APPENDIX C: LOBBYING DISCLOSURES

**DISCLOSURE OF LOBBYING ACTIVITIES** OMB Control Number: 4040-0013  
Expiration Date: 2/28/2025

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

<b>1. * Type of Federal Action:</b> <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		<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee * Name: San Diego Housing Commission * Street 1: 1122 Broadway, Ste. 300    Street 2: * City: San Diego    State: CA, California    Zip: 92101 Congressional District, if known: CA-52					
<b>5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:</b>					
<b>6. * Federal Department/Agency:</b> U.S. Dept. of Housing and Urban Dev.			<b>7. * Federal Program Name/Description:</b> Fiscal Year 2025 Moving to Work (MTW) Block Grant CFDA Number, if applicable:		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$ 277,525,125.00		
<b>10. a. Name and Address of Lobbying Registrant:</b> Prefix:    * First Name: N/A    Middle Name: * Last Name: N/A    Suffix: * Street 1:    Street 2: * City:    State:    Zip:					
<b>b. Individual Performing Services (including address if different from No. 10a)</b> Prefix:    * First Name: N/A    Middle Name: * Last Name: N/A    Suffix: * Street 1:    Street 2: * City:    State:    Zip:					
<b>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 her above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.</b> * Signature: [Redacted Signature] * Name: [Redacted Name]    * First Name: Lisa    Middle Name: * Last Name: Jones    Suffix: Title: President & CEO    Telephone No.:    Date: 12/14/2023					
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## APPENDIX D: NON-MTW RELATED SDHC INFORMATION

### STATE FUNDING FOR HOMELESSNESS OUTREACH

The State of California allocated \$750,000 in its Fiscal Year 2023-2024 budget to SDHC for SDHC's Multidisciplinary Outreach Program to address homelessness. California State Assemblymember Brian Maienschein advocated for these funds.

This Multidisciplinary Outreach Program serves individuals and families who are among the most vulnerable people experiencing unsheltered homelessness in the City of San Diego. The program focuses on people experiencing unsheltered homelessness who are among the highest utilizers of the criminal justice, emergency services or homelessness services systems. Many are chronically homeless, living with untreated medical and behavioral health conditions and have not been stably housed in years despite attempts by other programs to serve them. Outreach to these individuals requires more time and attention than other programs. The additional funding from the State will enable the program to assist additional individuals experiencing homelessness.

The outreach team includes a nurse practitioner, outreach specialists, a medical assistant, peer support specialists and a substance-abuse counselor. SDHC contracts with People Assisting the Homeless (PATH) to operate the program. PATH subcontracts with Father Joe's Villages.

Assemblymember Maienschein, San Diego Mayor Todd Gloria and San Diego City Council President Sean Elo-Rivera announced the state funds at a media event in October.



Multidisciplinary Outreach Program – State Funding Announcement  
October 5, 2023



### EXPANDING HOMEOWNERSHIP OPPORTUNITIES FOR PEOPLE OF COLOR

Help to navigate the process necessary to become first-time homebuyers is a phone call or email away for middle-income Black, Indigenous, People of Color (BIPOC) households through a joint effort of the San Diego Housing Commission (SDHC) and the San Diego Homeownership Equity Collaborative.

In September 2023, SDHC announced a dedicated phone number and email address to connect households of color with a Homeownership Advisor who works for SDHC. The Homeownership Advisor helps homebuyers of color by answering their questions; performing an initial assessment of their financial preparedness; and referring and connecting them to organizations for services, such as more in-depth evaluation of financial readiness, financial coaching, developing a plan to be ready for a mortgage, increasing their credit score, managing debt and overcoming financial challenges.

Major funding for the Homeownership Advisor is from the Wells Fargo Foundation's Wealth Opportunities Realized Through Homeownership (WORTH) initiative. Wells Fargo awarded a \$7.5 million WORTH grant to SDHC, on behalf of the San Diego Homeownership Equity Collaborative, to help create 5,000 new homeowners of color in San Diego County by the end of 2025.

### STATE FUNDING: \$45 MILLION TO CREATE AFFORDABLE HOMES

Proposed developments that would create more than 1,180 affordable homes would receive financial support through a \$45 million grant the State of California awarded to SDHC.

The state awarded SDHC the maximum amount available for large cities through the grant program. SDHC applied for the grant on behalf of the City of San Diego.

The state program made grants available to fill gaps in financing for infrastructure and improvements to existing buildings that are necessary for specific residential or mixed-use projects in urban areas, known as infill developments. The projects funded as part of San Diego's application build upon policies pioneered by the City of San Diego to address housing affordability, including using surplus state land, building on underused land at a trolley stop owned by the Metropolitan Transit System, and leveraging a local community land trust. The SDHC Board of Commissioners on April 6, 2023, authorized SDHC to apply for the grant.

According to the California Department of [Housing and Community Development](#), which administers the state grant program, the grant awarded to SDHC will fund site preparation, including demolition, excavation, grading, soil stabilization, erosion control, weed control, and dewatering. Surface improvements will include concrete paving and traffic signals. In addition, the funds will support new residential parking for the housing developments, and transit investments will fund new pathways, bus shelters, and bike facilities.

### 'SENIORS SAFE AT HOME' INITIATIVE

SDHC is collaborating with Serving Seniors and the Lucky Duck Foundation, with support from the City of San Diego, on a new program known as "Seniors Safe at Home." This program will help seniors aged 55 and older with low income, experiencing a housing crisis and at risk of homelessness.

San Diego City Council President Sean Elo-Rivera, who chairs the Housing Authority of the



## APPENDIX D: NON-MTW RELATED SDHC INFORMATION



City of San Diego, County of San Diego Board of Supervisors Chair Nora Vargas, Serving Seniors President & CEO Paul Downey, and Lucky Duck Foundation Executive Director Drew Moser announced the program at a news conference on September 29.

The program will provide time-limited case management and a specific rental assistance amount per month for eligible, participating seniors. SDHC will receive referrals from SDHC’s HOUSING FIRST - SAN DIEGO phone hotline and determine household eligibility. SDHC will process the rental assistance payment and refer the household to Serving Seniors for ongoing case management and connection to community resources.

The Lucky Duck Foundation is investing \$500,000 in philanthropic funds to make this program possible.



“Seniors Safe at Home” Announcement  
September 29, 2023



## APPENDIX E: CURRENT ALTERNATIVE REASONABLE COST LIMITS

### SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

Project References								
PROPERTY NAME	BUILDING	TYPE	HCC (\$)	TDC (\$)	GROSS SF	\$/SF HCC	\$/SF TDC	BOARD REPORT
<b>Elevator</b>								
RANCHO BERNARDO TRANSIT VILLAGE	ELEVATOR	NEW	\$56,534,311	\$68,296,389	90,000	\$628.16	\$758.85	HCR22-118
CORTEZ HILL APARTMENTS	ELEVATOR	NEW	\$28,129,755	\$38,706,921	54,711	\$514.15	\$707.48	HCR23-017
MT ETNA FAMILY - MODICA	ELEVATOR	NEW	\$31,616,228	\$52,196,213	87,773	\$360.20	\$594.67	HCR23-036
CUATRO AT CITY HEIGHTS	ELEVATOR	NEW	\$52,338,491	\$78,037,266	132,958	\$393.65	\$586.93	HCR23-045
SKYLINE APARTMENTS	ELEVATOR	NEW	\$61,277,385	\$88,017,542	93,976	\$652.05	\$936.60	HCR23-094
THE IRIS	ELEVATOR	NEW	\$40,185,204	\$59,145,153	115,424	\$348.15	\$490.02	HCR23-095
HARRINGTON HEIGHTS	ELEVATOR	NEW	\$99,533,433	\$138,816,630	190,000	\$523.86	\$730.61	HCR23-096
8TH AVENUE FAMILY HOUSING	ELEVATOR	NEW	\$29,011,442	\$36,874,898	78,292	\$370.55	\$470.99	HCR23-119
<b>Walkup</b>								
SERENADE ON 43 <sup>RD</sup>	WALKUP	NEW	\$17,836,941	\$37,211,890	53,373	\$334.19	\$697.20	HCR23-056



## SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

### PROPOSED METHODOLOGY

AVERAGE TDC AND HCC		
	AVERAGE TDC PER Sq. Ft.	AVERAGE HCC PER Sq. Ft.
ELEVATOR	<b>\$614.44</b>	<b>\$395.54</b>
WALKUP	<b>\$730.61</b>	<b>\$523.86</b>

### WALKUP COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
<b>HCC: 523.86 TDC: 730.61</b>															
<b>HUD</b>	Walkup	107,653	188,393	148,848	260,484	188,982	330,718	247,176	432,559	307,975	538,955	346,772	606,850	385,035	673,812
<b>SDHC</b>	Walkup	261,930	365,307	366,702	511,430	471,474	657,552	628,632	876,737	785,790	1,095,921	890,562	1,242,044	995,334	1,388,166

### ELEVATOR COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
<b>HCC: 395.54 TDC: 614.44</b>															
<b>HUD</b>	Elevator	117,583	188,133	164,617	263,387	211,650	338,640	282,200	451,520	352,750	564,400	399,783	639,653	446,816	714,906
<b>SDHC</b>	Elevator	197,768	307,219	276,876	430,107	355,983	552,995	474,644	737,327	593,305	921,658	672,413	1,044,546	751,520	1,167,434

### TDC/HCC TABLE: ACTIVITY #2021-1

#### PROPOSED SDHC REASONABLE COST LIMITS

	0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
	<b>Detached/Semi-Detached</b>	136,343	238,601	176,741	309,297	211,000	369,250	251,321	439,813	296,325	518,568	324,990	568,732	351,888
<b>Row Homes</b>	115,702	202,479	153,383	268,420	188,093	329,153	235,032	411,306	283,362	495,884	312,598	547,047	339,871	594,775
<b>Walkup</b>	261,930	365,307	366,702	511,430	471,474	657,552	628,632	876,737	785,790	1,095,921	890,562	1,242,044	995,334	1,388,166
<b>Elevator</b>	197,768	307,219	276,876	430,107	355,983	552,995	474,644	737,327	593,305	921,658	672,413	1,044,546	751,520	1,167,434