



SAN DIEGO  
HOUSING  
COMMISSION

# Moving Forward Moving To Work Program Annual Plan for Fiscal Year 2020

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Rental Assistance Division  
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## TABLE OF CONTENTS

<b>Section I.</b>	<b>Introduction and Agency Goals .....</b>	<b>1</b>
	A. Introduction .....	1
	B. Short-Term and Long-Term MTW Goals .....	2
<b>Section II.</b>	<b>General Housing Authority Operating Information.....</b>	<b>7</b>
	A. Housing Stock Information Matrix .....	7
	B. Leasing Information Matrix.....	10
	C. Waitlist Information Matrix .....	11
<b>Section III:</b>	<b>Proposed MTW Activities .....</b>	<b>12</b>
	2020–1. Landlord Retention and Incentive Program .....	12
	2016–1. The Monarch School Project .....	15
<b>Section IV.</b>	<b>Approved MTW Activities.....</b>	<b>21</b>
	A. Implemented Activities Matrix .....	21
	B. Not Yet Implemented Activities Matrix.....	32
	C. Activities on Hold Matrix .....	33
	D. Closed Out Activities Matrix .....	34
<b>Section V.</b>	<b>MTW Sources and Uses of Funds.....</b>	<b>36</b>
	A. Sources and Uses of MTW Funds Matrix .....	36
	B. Single Fund Flexibility Narrative .....	37
	C. Local Asset Management Plan Matrix.....	42
	D. Rental Assistance Demonstration (RAD) Participation Matrix .....	42
	E. MTW Block Grant Commitments .....	42
<b>Section VI.</b>	<b>Administrative.....</b>	<b>43</b>
	A. Board Resolution and Certifications of Compliance .....	43
	B. Documentation of Public Process.....	43
	C. Planned and Ongoing Evaluations.....	43
	D. Lobbying Disclosures .....	43
<b>Appendices:</b>		
	A. Board Resolution and Certifications of Compliance .....	44
	B. Documentation of Public Process.....	49
	C. Lobbying Disclosures .....	55
	D. Non-MTW Related SDHC Information .....	56



### SECTION I – INTRODUCTION

#### A. Message from the President & CEO

In the last 10 years, the San Diego Housing Commission (SDHC) has transformed from a traditional public housing authority to an organization recognized nationally for its innovative approaches to providing housing assistance to households with low income or experiencing homelessness.



Many of our innovations are possible because of the flexibility allowed by SDHC's status as one of only 39 "Moving to Work" (MTW) agencies nationwide.

Through our largest program, SDHC provides federal rental assistance to more than 15,000 families. We encourage financial self-reliance and provide the support families need to achieve it through initiatives like the SDHC Achievement Academy, established with MTW flexibility.

A learning and resource center with a computer lab, the SDHC Achievement Academy has served more than 5,600 individuals since it opened in 2010, including placing more than 1,000 individuals in jobs. The average income of SDHC Achievement Academy participants has increased more than 38 percent in that time.

SDHC's leadership role in collaborative efforts to address homelessness in San Diego also has grown. This includes our landmark HOUSING FIRST – SAN DIEGO homelessness action plan, which created more than 2,000 housing opportunities in Fiscal Year 2018 (July 1, 2017 – June 30, 2018) for San Diegans experiencing homelessness.

With MTW flexibility, since 2010, SDHC has committed more than 4,000 rental housing vouchers to address homelessness in the City of San Diego, including vouchers committed through HOUSING FIRST – SAN DIEGO.

In addition, SDHC continues to provide housing opportunities as a landlord and a partner in developments that create and preserve affordable housing. SDHC, including its nonprofit affiliate, owns or manages more than 3,700 affordable rental housing units in the City of San Diego. In the last 10 years, SDHC has partnered with developers to create



and preserve more than 7,600 affordable rental housing units, including more than 900 that were completed in Fiscal Year 2018.

Building on the achievements of the last decade, SDHC will continue to develop innovative approaches as an MTW agency to have a positive impact on the families we serve.

At SDHC, “We’re About People.”

Sincerely,

Richard C. Gentry  
President & Chief Executive Officer  
San Diego Housing Commission

### **B. Short-Term and Long-Term MTW Goals**

#### **Long-Term Goals**

##### **SDHC Strategic Plan 2016–2020**

The San Diego Housing Commission’s (SDHC) four-year Strategic Plan (2016–2020), which was approved September 9, 2016, provides a framework to identify how SDHC can have the greatest possible impact with limited financial resources.

The Plan identifies three goals, each of which includes corresponding objectives and metrics to measure progress:

1. Maximize resources through operational efficiencies and technological innovations
2. Increase the number of housing opportunities that serve low-income and homeless individuals and families in the city of San Diego



### 3. Advocate for more effective affordable housing policies and resources

SDHC's Strategic Plan builds upon the accomplishments of the agency's 2014–2016 Strategic Plan and complements the MTW program's statutory objectives to use federal dollars more efficiently; help residents on their path to economic independence; and improve housing choices for low-income families.

### **HOUSING FIRST – SAN DIEGO: 2018–2020**

SDHC's MTW status enables the agency to leverage its available resources to address homelessness in the City of San Diego through HOUSING FIRST – SAN DIEGO, SDHC's homelessness action plan.

The current phase of this plan launched on July 1, 2017, and directs \$79.7 million in federal, City, and SDHC resources over three fiscal years (2018–2020) toward six programs to create permanent housing opportunities for at least 3,000 San Diegans experiencing homelessness:

- Landlord Engagement and Assistance Program (LEAP)
- New Permanent Supportive Housing
- SDHC Moving Home Rapid Rehousing, an SDHC MTW initiative
- SDHC Moving On Rental Assistance, an SDHC MTW initiative
- Homeless Prevention & Diversion
- Coordinated Outreach

In its first year, Fiscal Year 2018 (July 1, 2017 – June 30, 2018), HOUSING FIRST – SAN DIEGO: 2018–2020 created 2,068 housing opportunities for San Diegans experiencing homelessness.

### **Short-Term Goals**

#### **San Diego EnVision Center**

The SDHC Achievement Academy is one of the key partners in the collaboration among SDHC, the City of San Diego, and the San Diego Workforce Partnership that was selected to be one of 17 HUD EnVision Centers across the country.



The San Diego EnVision Center is anticipated to formally open in 2019.

HUD's selection of this SDHC partnership as an EnVision Center reflects SDHC's track record of successful collaborations with community partners to achieve positive results for the families the agency serves.

The San Diego EnVision Center was announced by HUD Secretary Ben Carson on June 7, 2018. It will promote financial self-reliance among federal rental assistance recipients and public housing residents.

EnVision Center services will be provided at the SDHC Achievement Academy in Downtown San Diego and South Metro Career Center in the city's southern region. Services will be offered in four areas:

- Economic Empowerment
- Educational Advancement
- Health & Wellness
- Character & Leadership Development

### **Creating & Preserving Affordable Housing**

The new construction or rehabilitation of approximately 1,000 affordable rental housing units through SDHC partnership developments is expected to be completed in the first few months of 2019. This includes rental housing units with supportive services, supported by HOUSING FIRST – SAN DIEGO, SDHC's homelessness action plan:

- Coronado Terrace (Rehabilitation)
  - 310 affordable two- and three-bedroom units (affordable up to 60 percent of San Diego Area Median Income [AMI])
  - SDHC authorized the issuance of up to \$87.1 million in Multifamily Housing Revenue Bonds, approved by the Housing Authority of the City of San Diego, toward the total development cost of \$125.7 million.
- Luther Tower (Rehabilitation)
  - 198 affordable studios, one-, and two-bedroom units for low-income seniors (affordable up to 60 percent of AMI)
  - SDHC authorized the issuance of \$20 million in Multifamily Housing Revenue Bonds, approved by the Housing Authority of the City of San Diego, toward the total development cost of \$29.3 million.



- New Palace Hotel (Rehabilitation)
  - 79 affordable studios for seniors at risk of homelessness (affordable up to 60 percent of AMI)
  - SDHC provided 79 federal Project-Based Housing Vouchers
  - SDHC invested a \$3.1 million loan and authorized the issuance of \$10.5 million in Multifamily Housing Revenue Bonds, approved by the Housing Authority of the City of San Diego, toward the total development cost of \$22 million.
- The Nook East Village (New Construction)
  - 90 affordable Single Room Occupancy units (affordable up to 80 percent of San Diego Area Median Income [AMI]), including eight permanent supportive housing units for Veterans experiencing homelessness (affordable up to 30 percent of AMI)
  - SDHC awarded eight Veterans Affairs Supportive Housing (VASH) vouchers
  - SDHC invested a loan of \$750,000 toward the total development cost of \$13.7 million
- Parkside Apartments (Rehabilitation)
  - 39 affordable one-, two-, and three-bedroom units (affordable up to 60 percent of AMI)
  - SDHC authorized the issuance of up to \$5.5 million in Multifamily Housing Revenue Bonds, approved by the Housing Authority of the City of San Diego, toward the total development cost of \$10.7 million.
- Town & Country Village Apartments (Rehabilitation)
  - 143 affordable two- and three-bedroom units (affordable up to 60 percent of AMI)
  - SDHC invested a \$13.25 million seller carryback note and authorized the issuance of up to \$28.4 million in Multifamily Housing Revenue Bonds, approved by the Housing Authority of the City of San Diego, toward the total development cost of \$49 million.
- Villa Encantada (New Construction)
  - 66 affordable two- and three-bedroom units (affordable up to 60 percent of AMI)



- SDHC invested a loan of \$7.5 million toward the total development cost of \$27 million
- Zephyr Grantville Veterans Apartments (Rehabilitation)
  - 84 permanent supportive housing studio and one-bedroom units for Veterans experiencing homelessness (affordable up to 40 percent of AMI)
  - SDHC awarded 84 federal Project-Based Housing Vouchers
  - SDHC invested a loan of \$3 million toward the total development cost of \$27.2 million



## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION



### SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION

#### Section II(A). MTW Plan: Housing Stock Information

##### i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

Asses Management Project (AMP) Name and Number	Bedroom Size						Total Units	Population Type*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/0	2	3	4	5	6+			Fully Accessible	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

## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION



### Section II(A). MTW Plan: Housing Stock Information

#### 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
Jamboree-San Ysidro	64	N/A	Homeless

**64** 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
Townpeople	9	Leased/Issued	N/A	Homeless
Potiker	36	Leased/Issued	N/A	Low-Income
Alabama Manor	14	Leased/Issued	N/A	Low-Income
Meade	11	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	26	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	32	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
The Lofts	52	Leased/Issued	N/A	Homeless
Zephyr Housing	84	Leased/Issued	N/A	Homeless
Vista Del Puente	38	Leased/Issued	N/A	Homeless
The Beacon	43	Leased/Issued	N/A	Homeless
Twain Veteran	62	Leased/Issued	N/A	Homeless
The Link	72	Committed	N/A	Homeless
San Ysidro Senior	50	Committed	N/A	Homeless

**1,260** Planned Total Existing Project-Based Vouchers

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

## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION



Section II(A). MTW Plan: Housing Stock Information			
<b>v. Planned Other Changes to MTW Housing Stock Anticipated in the Plan Year</b> 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.			
<table border="1"> <thead> <tr> <th>Planned Other Changes to MTW Housing Stock Anticipated in the Plan Year</th> </tr> </thead> <tbody> <tr> <td>N/A</td> </tr> </tbody> </table>		Planned Other Changes to MTW Housing Stock Anticipated in the Plan Year	N/A
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N/A			
<b>vi. General Description of All Planned Capital Expenditures During the Plan Year</b> Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.			
<table border="1"> <thead> <tr> <th>General Description of All Planned Capital Expenditures During the Plan Year</th> </tr> </thead> <tbody> <tr> <td> <b>Capital Fund 2019</b>             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. The properties are Otay-Picador, Vista Verde, VLC-36, Valeta St, Trojan Avenue, Mason St, Camulos and 44<sup>th</sup> Street. Approximately \$1,460,000.00 shall be used for the following capital needs. Hard costs will include upgrades property fencing, parking lot seal and stripe, water conservation landscape and irrigation system, solar PV panel upgrades, limited stair upgrades, exterior area and building lighting, limited electrical, signage, and limited site improvements. Soft costs shall include architecture and engineering and third party consultants for due diligence related activities. The property and scope selection is to be determined.         </td> </tr> </tbody> </table>		General Description of All Planned Capital Expenditures During the Plan Year	<b>Capital Fund 2019</b>  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. The properties are Otay-Picador, Vista Verde, VLC-36, Valeta St, Trojan Avenue, Mason St, Camulos and 44 <sup>th</sup> Street. Approximately \$1,460,000.00 shall be used for the following capital needs. Hard costs will include upgrades property fencing, parking lot seal and stripe, water conservation landscape and irrigation system, solar PV panel upgrades, limited stair upgrades, exterior area and building lighting, limited electrical, signage, and limited site improvements. Soft costs shall include architecture and engineering and third party consultants for due diligence related activities. The property and scope selection is to be determined.
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## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION



### Section II(B). MTW Plan: Leasing Information

#### 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	2,220	185
MTW Housing Choice Vouchers Utilized	170,076	14,173
Local, Non-Traditional: Tenant-Based^	9,504	792
Local, Non-Traditional: Property-Based^	10,452	871
Local, Non-Traditional: Homeownership^	0	0

Planned Total Households Served 192,252 16,021

\* "Planned Number of Unit Months Occupied/Leased is the total number of months the MTW PHA plans to have leased/occupied in each

\*\* "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households

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	9,084	757
Tenant-Based	Transitional Project-Based Subsidy Program/2013-6	528	44
Tenant-Based	Monarch Housing Program/2016-1	300	25
Tenant-Based	Guardian Scholars Program/2016-2	1,080	90
Tenant-Based	Moving On Program/2017-1	420	35
Tenant-Based	Moving Home Program/2018-1	1,440	120
Property-Based	Affordable Housing Development/2011-7	10,452	871

Planned/Actual Totals 23,304 1,942

\* 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	N/A

## SECTION II – GENERAL HOUSING AUTHORITY OPERATING INFORMATION



### Section II(C). MTW Plan: Waiting List Information

#### i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

Waiting List Name	Description	Number of Households on Waiting List	Waiting List Open, Partially Open, or Closed
Housing Choice Voucher: Tenant-Based	Community Wide	91,257	Open
Housing Choice Voucher: Project-Based	Site-Based	10	Open
Housing Choice Voucher: Project-Based	Site-Based	25	Closed
Public Housing	Community Wide	70,348	Open
Local Non-Traditional	Community Wide	98	Open

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.

#### 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	All households to be contacted during FY 20 to gauge continued interest and update the waitlist
Housing Choice Voucher: Project-Based	No Changes
Housing Choice Voucher: Project-Based	No Changes
Public Housing	No Changes
Local Non-Traditional	No Changes



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

### 2020–1 .LANDLORD PARTNERSHIP PROGRAM

**Activity Description:** The City of San Diego is experiencing an escalating housing market and unprecedented market rents. Coupled with low-vacancy rates, Housing Choice Voucher (HCV) participants are experiencing difficulty identifying and leasing affordable rental units. In certain instances, voucher search times can exceed 120 days despite internal process improvements decreasing lease up transaction timelines. Therefore, additional incentives and strategies are necessary to ensure all voucher recipients are housed in a timely manner while ensuring safe, decent and quality dwelling units.

SDHC has already experienced success with the Landlord Engagement & Assistance Program (LEAP), a program designed to incentivize landlords to lease units to homeless households. Due to the success of LEAP, SDHC proposes to implement a similar program, aimed at increasing and retaining quality housing units, within the broader HCV program.

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.

Incentives are designed to recruit new landlords and units as well as retain existing units within the portfolio of available housing. Proposed strategies and incentives will include the following:

- 1. *Incentive Payments:*** Lump sum payment issued to Landlords for leasing to a SDHC HCV family within SDHC jurisdiction. The proposed budget for this fund is \$600K.
- 2. *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. The maximum permissible request will be \$3K and the proposed budget for this fund is \$250K.
- 3. *Move flexibility allowance:*** In the instance of a tenant vacating a subsidized unit to move to a new unit, SDHC may cover up to five days of HAP overlap, regardless of



move month, to ensure neither landlord is harmed in the process. The estimated budget for this incentive is \$150K for the first year.

**4. *Simplified inspections***

- a. As part of SDHC's Biennial Inspections Activity, qualified units are subject to biennial inspections instead of annual inspections. In order to ensure housing units maintain biennial status, a quality assurance (QA) plan with random QA inspections was established. These inspections are conducted with the same protocol as a regular inspection. Upon successful results, SDHC will consider the QA inspection as a successful biennial inspection. For prospective landlords, SDHC will pre inspect vacant units and provide 60-day inspection validation.

**5. *Landlord Liaison team:*** SDHC will establish a specialized team to provide quality customer service to landlords. The team will be responsible for monitoring all program incentives and conducting annual program reviews with recommendations to enhance program.

**6. *Participant Assistance:*** A dedicated team will support families (new and moves) in the process to ensure timely lease ups.

SDHC will perform ongoing analysis to determine the success of each incentive as well as solicit feedback from landlords for possible enhancements to the program. SDHC may adjust the incentives in future years to adjust for market fluctuations, landlord feedback, funding considerations, and local priorities. The incentives offered through this program will serve to retain and incentivize landlords to participate in the HCV program by eliminating barriers to participation and improving lease up timelines.

***Statutory Objectives:*** The activity will achieve the statutory objective of increasing housing choice for low-income families since the activity results in additional rental housing inventory within the City of San Diego.

***Anticipated Impacts:*** The activity is primarily designed to attract new landlords and add units to the Housing Choice Voucher unit inventory as well as incentivizing existing landlords to either lease more units to rental assistance participants or maintain existing housing resources for participants. The anticipated impact of the activity is an increase in the number of units available for lease to Housing Choice Voucher participants, thus increasing housing choice and the ability to more rapidly house rental assistance families.



***Anticipated Timeline to Achieve Objectives:*** SDHC anticipates implementing the incentive program during Fiscal Year 2020. The first year of implementation will focus on evaluating the results of individual recruitment activities and the impact of the menu of incentives offered in order to inform future programmatic modifications and approaches to the program. The expectation is the second year of implementation will yield positive results with benchmarks achieved in the third year of operation.

#### Activity Metrics Information:

Landlord Retention and Incentive Program					
Metric	Baseline		Benchmark		Outcome
	#	%	#	%	
<i>HC #5: Increase in Resident Mobility</i> Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0		50		
<i>HC #7: Households Assisted by Services that Increase Housing Choice</i> Number of households receiving services aimed to increase housing choice (increase).	0		300		
<i>CE #1: Agency Cost Savings</i> Total cost of task in dollars (decrease).	\$227,340		\$216,540		
<i>CE #2: Staff Time Savings</i> Total time to complete the task in staff hours (decrease).	6,315		6,015		
<i>CE #3: Decrease in Error Rate of Task Execution</i> Average error rate in completing a task as a percentage (decrease).	0		0		

#### Projected Outcomes:

- HC #5: The landlord incentives may increase the unit inventory in SDHC's zip codes of opportunity. The number of new units added to SDHC's opportunity zip codes will inform the outcome of the metric.
- HC #7: Landlord incentives will directly impact the availability of units in San Diego, thus increasing housing choice in the city. The number of families occupying the new units throughout SDHC's jurisdiction will be quantified in the outcome.
- CE #1: SDHC will consider the QA inspection as a successful biennial inspection which will decrease agency costs. The total number of quality control inspections completed is necessary to calculate this metric.
- CE #2: Allowing quality control inspections to qualify as a full inspection will decrease the total staff time dedicated to the task. The amount of quality control inspections completed will inform the outcome of this metric.



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



**Cost Implications:** Based on the initiative’s goals, internal analysis of historical data, and the programmatic budget, the financial impact is predicted as follows:

Financial Impact Analysis: Annual Cost Predictions			
Incentive Description	Estimated Incentive Amount	Estimated Units	Estimated Cost
Incentive Payments for New Units	\$500	1,200	\$600,000
Assurance Funds	\$3,000	150	\$250,000
Move Flexibility	\$175	800	\$150,000
Unit Pre-Qualification Policy	\$0	400	\$0
TOTAL ESTIMATED COST:			\$1,000,000

SDHC will internally budget \$1M for the first year, of the MTW block grant to fund the program. The additional funding commitment allows for program expansion or unforeseen programmatic expenditures.

**Need/Justification for MTW Flexibility:** MTW Agreement Attachment C, Section B (1) (b) (iii) & (viii), Section B (1) (c), and Section B (1) (d) containing waivers of Sections 8 and 9 of the U.S. Housing Act of 1937 and 24 CFR 982 and 990 as necessary to implement single fund flexibility for Section 8 activities providing incentive payments to landlords; Section (D) (1) (d) containing waivers of Section 8 (o) (9) of the U.S. Housing Act of 1937 and 24 CFR 982.311 to implement a local vacancy payment policy; Section D (5) containing waivers of Section 8 (o)(8) of the 1937 Act and 24 CFR 982 Subpart I and MTW Agreement Attachment D, Community Specific Authorizations, as necessary to implement a local inspection protocol.

**Rent Reform/Term Limit Information (if applicable):** N/A

#### 2016–1.THE MONARCH SCHOOL PROJECT

**Activity Description:** In FY 2016, SDHC proposed a local, non-traditional tenant-based rental assistance program in partnership with a non-profit agency to offer affordable housing solutions to families with school-aged children. The Monarch School Project targets homeless families with children attending Monarch School (Monarch) and provides a rental subsidy to the families. As part of the initial program, parents engaged

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



in work-readiness services while contributing to the children's academic development and progress. The program was projected to assist 25 families over the first three years of implementation. The re-proposal of the initiative allows us to provide the appropriate services as required by families to ensure long term stable housing. SDHC will ensure that families have access to the right intervention including permanent supportive housing (PSH), as required.

Monarch School is a public/private partnership between the San Diego County Office of Education and the Monarch School Project, a local non-profit agency. Since 1988, Monarch serves approximately 300 students annually and offers K-12 learning while delivering supportive services. Monarch removes barriers typically encountered by homeless students and provides programs and services not offered at traditional public schools. The proposed activity seeks to increase family stability and academic success by providing a secure living situation while ensuring families receive a full array of services and assistance. Currently, Monarch provides for needs such as nutritious meals, hygiene, clothing, school supplies, transportation, and counseling. Monarch will continue to offer the services as a component of the Monarch School Project.

Monarch School is dedicated to helping San Diego's homeless students break the cycle of poverty. The students live in shelters, motels, parks, cars, double- or triple-up with other families in small apartments, or on the streets. Oftentimes, students have been absent from school for long periods of time and are achieving below grade level when enrolled in Monarch. The typical student arrives at Monarch three years behind grade level, yet progresses one full year academically for every six months spent at Monarch. The proposed program will provide the housing stability necessary for achieving academic success.

In the initial years of implementation, SDHC has recognized the range of services needed to ensure housing stability for the population. SDHC will commit to provide PSH level services and housing. We will continue providing additional services to all adult household members via the SDHC Achievement Academy's (AA) resources. The Achievement Academy is a state-of-the-art learning and skills center with a computer lab available to rental assistance participants. The AA provides access to a SDHC workforce readiness specialist and services to improve the quality of life. Services for personal growth include budgeting, banking, credit repair etc. Career focused services

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



include resume preparation, workforce reentry, interviewing skills, trainings and job placement services.

*Program Duration and Subsidy Calculation Methodology:* The Monarch School Project will provide rental assistance to homeless families with at least one minor (defined as ages 4 to 19) attending Monarch. Families are required to meet the requirements of program like engaging in case management and Achievement Academy activities (based on population) and school-provided services as a condition of continued program participation. Additionally, families over 80 percent of the published Area Median Income for the given family size will not remain eligible for continued assistance; a six-month transition will be granted to families leaving the program if program termination is not due to failure to comply with program requirements. Subsidies will be calculated at 28.5 percent of monthly income amounts and the applicable payment standards. A minimum rent of \$25 applies to the program. Assets, deductions, expenses, and allowances, including the utility allowance, will not be considered for purposes of calculating the subsidy. The initial subsidy will be determined at program entry and re-determined annually until the conclusion of program participation.

SDHC will provide services through its Landlord Engagement and Assistance Program such as security deposits, unit search assistance etc. to ensure families successfully locate appropriate housing upon program admission. Depending on the population served, SDHC may apply the *Path to Success* rent calculation structure to a specific allocation of subsidies. If the youngest child of an assisted family graduates from Monarch and SDHC determines the need for PSH for the family, we will consider transitioning the family to a voucher subsidy program to ensure ongoing stability.

*Administration:* SDHC staff will perform the subsidy calculations and assist Monarch with administering a streamlined eligibility. File audits will be conducted by SDHC to ensure program integrity.

For purposes of initial eligibility, criminal history will not be reviewed with the exception of sex offender status and manufacturing methamphetamines within federally funded properties. Federal and/or state registration as a sex offender will preclude individuals from participating in the program. Participants will be required to apply to the HCV tenant-based waitlist upon program admission.

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



*HQS Inspections:* Inspections will be conducted at program admission and biennially thereafter. Initial inspections will be conducted if the family moves to another unit. All SDHC HQS guidelines apply to the program.

*Waitlist:* The waitlist, administered by Monarch, will be based on referrals from the Coordinated Entry System (CES). Only families with children enrolled in Monarch will be selected and proceed through the application process. Enrollment in Monarch will be verified during the eligibility process. SDHC will audit the waitlist to ensure compliance.

**Statutory Objectives:** The activity will achieve the statutory objectives of increasing self-sufficiency through the rendering of supportive services and increasing housing choice for homeless families via the creation of rental subsidies.

**Anticipated Impacts:** The Monarch School Project is expected to create stability within a typically unstable population of San Diego by providing families with subsidies and the necessary resources. Anticipated impacts of the program include:

- Economic advancement
- Increased employment opportunities
- Improved stability and self-sufficiency
- Improved school achievement and attendance
- Improved social and emotional well being
- Creation of an additional 25 units of assisted housing

**Anticipated Timeline to Achieve Objectives:** The activity currently serves 22 families. The re-proposal does not include increasing the program size and plans continue maintain the desired program size of 25 families. Given the population and the requirement for long term services, the proposed benchmarks should be achieved by June 30, 2023.

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



### Activity Metrics Information:

Monarch School Housing Program				
Metric	Baseline # %	Benchmark # %	Outcome	Benchmark Achieved?
<i>CE #4: Increase in Resources Leveraged</i> Amount of funds leveraged in dollars (increase)	\$0	\$10,000		
<i>SS #1: Increase in Household Income</i> Average earned income of households affected by this policy in dollars (increase)	\$7,290	\$10,400		
<i>SS #2: Increase in Household Savings</i> Average amount of savings/escrow of households affected by this policy in dollars.	\$0	\$150		
<i>SS #3: Increase in Positive Outcomes in Employment Status</i> Number of participants employed full-time Number of participants employed part-time Number of participants enrolled in an educational program Number of participants enrolled in a job training program Number of unemployed participants	0 2 0 0 22	5 8 2 2 10		
<i>SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)</i> Number of households receiving TANF assistance (decrease)	0	3		
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i> Number of households receiving services to increase self-sufficiency (increase)	0	20		
<i>SS #7: Increase in Agency Rental Revenue</i> Total household contributions towards housing assistance (increase)	\$0	\$90,000		
<i>SS #8: Households Transitioned to Self Sufficiency</i> Number of households transitioned to self-sufficiency (increase)	0	3		
<i>HC #5: Increase in Resident Mobility</i> Number of households able to move to a better unit and/or neighborhood as a result of the activity (increase)	0	15		



### ***Projected Outcomes:***

- CE #4: With increased access to services for families, resources leveraged will increase
- SS #1: Households will increase earned income working with the Achievement Academy
- SS #3: Adult participants will experience an increase in positive outcomes through gaining employment or receiving the education/training necessary to developing the necessary skills to obtain employment in the future. The benchmark numbers recognize PSH families' outcomes for employment may differ based on service needs.
- SS #4: Some households will surrender TANF assistance due to an increase in employment income.
- SS #5: Adult participants will receive supportive services aimed to increase self-sufficiency as a component of the program
- SS #8: For the purposes of the activity, self-sufficiency is defined as transitioning to permanent housing.
- HC #5: Families will be assisted through our Landlord Engagement and Assistance program in their search for units.

**Description of Data Source 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. A secondary reporting mechanism will be developed to collect data from partnering agencies. Data will be analyzed on an annual basis.

**Need/Justification for MTW Flexibility:** Broader Uses of Funds Authority amendment. SDHC will adhere to all requirements set forth in PIH Notice 2011-45.

Broader Uses of Funds Authority enables SDHC to create a local, non-traditional tenant-based rental assistance program and further enables the provision of case management and supportive services.

**Additional Information for Rent Reform Initiatives (if applicable):** N/A

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



### SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2018-1. Moving Home: A Rapid Rehousing Program	Using Broader Uses of Funds Authority, SDHC created rapid re-housing program to provide housing subsidy to families at-risk of homelessness. Subsidies are provided to the families while receiving services to ensure housing stability while gaining financial independence.	2018	July 1, 2018	N/A	N/A	N/A
2017-1. The Moving On Program	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.	2017	January 1, 2018	N/A	N/A	N/A
2016-1. The Monarch School Project	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. Update: Utilizing the Coordinated Entry System (CES) for programmatic referrals.	2016	January 1, 2016	N/A	N/A	Re-proposed in FY 2020 Plan
2016-2. The Guardian Scholars Program	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.	2016	August 1, 2016	N/A	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2016-3. Permanent Indoor Homeless Shelter Beds	In FY 2016, SDHC received approval under Broader Uses of Funds Authority, to subsidize shelter beds within a permanent indoor facility located in the City of San Diego. To combat the Hepatitis A outbreak in 2017 and the need to address homelessness in the City, Mayor Faulconer announced the creation of three new Bridge Shelter Programs to help individuals experiencing homelessness find shelter from the streets. The program provides overnight shelter with supportive services. The number of beds in FY 2020 is anticipated at 674, providing 246,010 bed nights of needed relief.	2016	July 1, 2019	SDHC administers three Bridge Shelters, opened on December 1, 2017. Based on an analysis of the three shelters, the per bed rate averages at \$32.52. In FY 2020, the anticipated MTW budget for the 674 beds is \$8M.	N/A	N/A
2015-1. Modify the 40 percent rent burden requirement	Modifies the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households.	2015	February 1, 2015	N/A	N/A	N/A
2014-3. Housing Subsidy Program for Homeless Youth	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. Program participants were offered the option to participate in Achievement Academy activities to supplement the supportive services received from the sponsoring agency. The target population is expanded to encompass all sub-populations of homeless youth, as defined by HUD. The Coordinated Entry System will be utilized to identify homeless youth appropriate for the program. The modifications address an increase in the homeless population of youth in San Diego. The title of the initiative is revised to reflect the change in population served. SDHC published several requests for proposals in an attempt to implement the program. Despite several modifications to the target population, the competitive processes continue to render zero applications.	2014	N/A	N/A	N/A	Reactivation of the activity is currently anticipated for Fiscal Year 2020. SDHC will evaluate the program annually to determine the feasibility of re-activating the program.





## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2014-2. Local Income Inclusion	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.	2014	November 1, 2013	N/A	N/A	N/A
2013-1. MTW VASH Program	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. Update: No change in the status of the activity.	2013	August 1, 2012	N/A	N/A	N/A
2013-2. Family Self-Sufficiency Reinvention	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. Re-proposed in Fiscal Year 2015 to allow an adult household member to enroll in the program as the sole participant.	2013	July 1, 2013	N/A	N/A	N/A
2013-3. Elimination of 100% excluded income from the income verification process	Removes the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058. Update: Activity is no longer closed out due to the expiration of PIH Notice 2013-03. SDHC intends to close the activity once the Final Rule (FR 5743-P-01) is published to re-activate the streamlining measure.	2013	September 1, 2012	N/A	N/A	N/A
2013-4. Public Housing: Flat rent elimination	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.	2013	August 1, 2014	N/A	N/A	N/A

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2013–6. Transitional Project-Based Subsidies for the Homeless	Utilizing Broader Uses of Funds Authority, SDHC partners with agencies to craft a transitional housing pilot 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. Updates: 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. The maximum subsidy is \$700 per bed. The target populations are expanded to include homeless veterans and victims of human trafficking. A modified alternate HQS policy will be used for the beds funded through the program.	2013	January 1, 2013	N/A	N/A	N/A
2012–1. Path to Success	<p>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. The activity was re-proposed in the Fiscal Year 2014 Plan to include a local portability policy. The local portability policy component of the activity was implemented effective November 1, 2013. Update: The standard HCV calculation may be used in PBV complexes servicing special needs populations.</p> <p>Re-proposed in the Fiscal Year 2019 MTW Annual Plan to increase minimum rents for Work-Able families and modify income bands to \$5,000 for all ranges.</p>	2012	<p>July 1, 2013 (rent calculation)</p> <p>November 1, 2013 (portability policy)</p>	N/A	N/A	N/A

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2012-2. Biennial Reexamination Schedule	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. Update: SDHC converted the Elderly/Disabled population to a Biennial Reexamination Schedule effective July 1, 2015.	2012	July 1, 2012	N/A	N/A	N/A
2012-3. Modify Full-Time Student Definition	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. Update: No change in the status of the activity.	2012	December 1, 2011	N/A	N/A	N/A
2011-1. Allow lower rents for non-assisted units in SDHC-owned developments	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. Update: No change in the status of the activity.	2011	October 1, 2010	N/A	N/A	N/A
2011-2. Authorize commitment of PBV to SDHC-owned units	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. Update: PBV units added to the Mason Hotel and Parker-Kier, developments owned by SDHC.	2011	October 1, 2010	N/A	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2011–3. Two year occupancy term for PBV tenants	<p>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. Update: The Mason Hotel and Parker–Kier contracts contain this requirement. Re–proposed in the Fiscal Year 2013 Plan 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. 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.</p> <p>Baselines, benchmarks, and metrics were modified in the Fiscal Year 2013 Plan due to the re–proposal.</p>	2011	October 1, 2010	N/–A	N/A	N/A
2011–4. Acquisition of additional affordable units	<p>Uses Broader Uses of Funds Authority to acquire affordable housing units in San Diego using MTW funds. Update: SDHC continues to explore viable opportunities to create affordable housing. The significant rehabilitation of the Hotel Churchill is currently in progress. Re–proposed in the Fiscal Year 2014 Plan to expand the methods of affordable housing development available to SDHC. The Fiscal Year 2012 Report clarifies rehabilitation is considered a method of preservation.</p>	2011	July 1, 2010	SDHC will utilize the initiative to develop accessory dwelling units (ADUs) per local ordinances to increase affordable housing options in the City of San Diego. ADUs, also known as companion units are identified as one of 5 main sources of potential housing opportunities to address the housing crisis.	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2011–6. Modify EIV income review schedule	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. Update: No change in the status of the activity.	2011	August 1, 2010	N/A	N/A	N/A
2011–7. Development of public housing units using a combination of funds	SDHC creates/preserves public housing, without a competitive process, using acquisition and rehabilitation as the method of development. Update: 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. SDHC intends to develop additional public housing in Fiscal Year 2014 via the state site conversion. This initiative was combined with the Fiscal Year 2010 Public Housing Development activity.	2011	July 1, 2010	N/A	N/A	N/A

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2011–8. Sponsor-based subsidies for the homeless	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. Re-proposed in the Fiscal Years 2013 and 2017 Plans to allow SDHC to allocate additional vouchers to the program, broaden the definition of homelessness, and apply MTW flexibilities to the rent calculation methodology, including the Path to Success rent calculation. 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. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2017 Plan due to the re-proposal.	2011	July 1, 2011	N/A	N/A	N/A
2010–1. Implement a revised inspection protocol	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. Update: Results for HQS inspections occurring before implementation of the activity may not be considered for purposes of placement on the biennial inspection cycle. Modifying the activity to remove the qualifying criteria and authorize placement of all MTW units onto a Biennial Inspection Cycle. 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.	2010	October 1, 2009 & June 1, 2010	N/A	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2010-2. Authorize the SDHC to inspect and determine rent reasonableness for SDHC owned properties	Utilizes a local procedure to conduct inspections and determine rent reasonableness for SDHC-owned properties are conducted by SDHC. Update: No change in the status of the activity.	2010	July 13, 2009	N/A	N/A	N/A
2010-4. Choice Communities	<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> <p>§ Moving for Opportunity Program</p> <p>§ Revolving Security Deposit Loan fund</p> <p>§ Increase payment standards in low-poverty areas</p> <p>Re-proposed in the Fiscal Year 2012 Plan Amendment to adopt a policy allowing SDHC to calculate payment standards below 90% of the FMR in high-poverty areas. 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. Re-proposed in the Fiscal Year 2018 MTW Annual Plan 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.</p>	2010	<p>January 1, 2010</p> <p>January 1, 2010</p> <p>June 1, 2010</p>	N/A	N/A	N/A
2010-5. Standardize utility allowances by unit size	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.	2010	April 1, 2010	N/A	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2010-6. Simplify income and asset verification systems to reduce administrative costs	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. Update: No change in the status of the activity. Re-proposed in the Fiscal Year 2016 MTW Plan 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.	2010	October 1, 2009	N/A	N/A	N/A
2010-7. Adopt a local interim certification policy	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. Update: 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". Re-proposed in the Fiscal Year 2012 Plan Amendment 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. Effective July 1, 2018, SDHC is eliminating the "No Fault of Your Own" policy as a reason to deny an interim request for a decrease in the rent portion. An review and analysis of the policy indicated minimal benefits. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2012 Plan Amendment due to the re-proposal.	2010	July 1, 2011	N/A	N/A	N/A



## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



IMPLEMENTED ACTIVITIES						
Activity	Description/Update	Plan Year	Implementation Date	Planned Non-significant Changes	Planned Changes to Metrics/Data Collection	Planned Significant Changes
2010-8. Establish an HCV homeownership program	<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>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>	2010	October 1, 2009	N/A	N/A	Re-implementation of the activity is currently anticipated for Fiscal Year 2020. 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.
2010-9. Expand the project-based voucher program	SDHC allocates a greater percent of budget authority to project-based vouchers to serve a variety of the homeless population 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; require the provision of supportive services in a development; utilize creative measures to allocate PBV in vacant and foreclosed properties; and designate greater than 20 percent of SDHC's allocation to PBV. Re-proposed in the Fiscal Year 2015 Plan 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.	2010	September 1, 2009	N/A	N/A	N/A

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



### NOT YET IMPLEMENTED ACTIVITIES

There are no activities in this category.

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



### ACTIVITIES ON HOLD

There are no activities in this category.

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



### CLOSED OUT ACTIVITIES

Activity	Description	Plan Year	Implementation Date	Date Closed Out	Reason(s) Closed Out
2014-1. Transitional Subsidy Program for Homeless Veterans	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.	2014	January 1, 2014	October 1, 2014	Veteran's Village of San Diego, the intended partnering agency for the program, indicated a preference to pursue an alternative rental subsidy program.
2013-5. Homeless Veteran Project-Based Subsidy Program	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.	2013	N/A	September 30, 2013	Veteran's Village of San Diego determined the activity as neither economically advantageous or viable under current circumstances and requested permission to close out the activity.
2013-9. New Public Housing Transition	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.	2013	N/A	September 30, 2013	The flexibility requested under this initiative will not be required.
2012-4. Project-Based Subsidy Program for the Homeless	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.	2012	N/A	December 31, 2014	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.
2011-5. Disregard retirement accounts	SDHC disregards retirement accounts when verifying an applicant or participant's assets.	2011	August 1, 2010	June 30, 2015	The re-proposal of activity 2010-6 wherein assets are eliminated from the rent calculation eliminates the need for the activity.
2011-9. Enhance Family Self-Sufficiency Program	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.	2011	October 1, 2010	July 1, 2014	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.
2011-10. Broader Uses of Funds for IDAs	SDHC received permission to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.	2011	July 1, 2010	June 30, 2011	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.

## SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



CLOSED OUT ACTIVITIES					
Activity	Description	Plan Year	Implementation Date	Date Closed Out	Reason(s) Closed Out
2010–3. Triennial reexaminations for elderly and disabled households	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.	2010	October 1, 2009	July 1, 2015	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.
2010–10. Undertake Public Housing development	Acquire, rehabilitate, or produce housing units as public housing.	2010	July 1, 2010	June 30, 2011	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.
2009–1. Achievement Academy of the San Diego Housing Commission	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.	2009	October 1, 2010	June 30, 2011	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.

## SECTION V – SOURCES AND USES OF FUNDS



### A. MTW Plan: Sources and Uses of MTW Funds

#### Estimated Sources of MTW Funding for the Fiscal Year

PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$1,082,962
70600	HUD PHA Operating Grants	\$178,206,381
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	\$2,420,477
<b>70000</b>	<b>Total Revenue</b>	<b>\$181,709,820</b>

#### Estimated Uses of MTW Funding for the Fiscal Year

PHAs shall provide the estimated uses and amounts of MTW spending by FDS line item.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$10,125,143
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$9,532,077
92500 (92100+92200+92300+92400)	Total Tenant Services	\$1,576,974
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$249,969
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$446,385
95000 (95100+95200+95300+95500)	Total Protective Services	\$59,460
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$257,329
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$2,931,327
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$19,130
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$156,512,025
97400	Depreciation Expense	\$0
97500+97600+97700+97800	All Other Expenses	\$0
<b>90000</b>	<b>Total Expenses</b>	<b>\$181,709,820</b>

**\$0**



### SINGLE FUND FLEXIBILITY

#### 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 designation in California, and only one of three co-located within a designated Promise Zone.

To provide maximum flexibility, one location will be housed in Southeast San Diego, bordering the Promise Zone. The other location will be at SDHC's Achievement Academy. EnVision Centers will be open to any current households receiving SDHC's rental assistance and those on the waitlist. Other clients will be residents of the Promise Zone.

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

#### 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.

## SECTION V- SOURCES AND USES OF FUNDS

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When possible, staff seeks to find 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 provide 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 following describes services offered at the Achievement Academy:

### **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 résumé writing, customer service, and how to retain a job. 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 KRA Corporation, a contractor from San Diego Workforce Partnership, provides services via a satellite One-Stop Career Center at the local downtown public library. The partner 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***

Landeros & Associates, a business consulting firm in San Diego, leads the microenterprise program educating participants about how to start or expand a small business and how to create or update a solid business plan. The program provides basic skills training and knowledge to underserved entrepreneurs and also identifies and expands linkages to critical community resources linked to small business development. Landeros & Associates



## SECTION V- SOURCES AND USES OF FUNDS

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also connects participants with opportunities for additional small business training, technical assistance, and access to mainstream financial institutions to boost economic development.

### ***Employment/Workforce Development Workshops***

SDHC Achievement Academy Workforce Readiness Specialists conduct employment readiness workshops and provide access to temporary and permanent employment. The Achievement Academy also offers on-site recruitment fairs. Participants are invited to attend presentations 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. Prior to some recruitments, participants may receive assistance in the Academy's computer lab to submit on-line applications for jobs that will be presented in the recruitment.

### **Youth Programs**

Staff at the Achievement Academy work to offer innovative programing in an effort to keep participants interested and engaged. Recently, the Academy began offering programs for "opportunity youth", defined as young adults between sixteen and twenty-four years of age who are not working or enrolled in school. Students receive education counseling or career guidance. The Achievement Academy has partnered with International Rescue Committee (IRC) to provide additional training and services to these young adults. IRC is also able to offer intern placements to develop employment history. The partnership with IRC is offered as their funding allows.

### ***Academy Computer Lab***

Participants have access to the SDHC Achievement Academy's 30-station computer lab for career assessments, career exploration, labor market information, résumé building, and on-line job applications. In addition, Manpower provides individual participant access to the internet based Training Development Center which hosts over 5,000 on-line courses for skills development. The Achievement Academy partners with San Diego Futures Foundation (as funding allows) to offer beginning and intermediate computer skills (Word, Excel, Internet) classes to participants with minimum or no previous computer use experience.

## **SECTION V- SOURCES AND USES OF FUNDS**

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### **Income Supports**

#### ***THRIVE Initiative***

THRIVE is a partnership between the United Way, the County of San Diego, and South Bay Community Services. The purpose of the initiative is to enhance the accessibility of benefits screening and tax preparation services. Benefits screening and application assistance is currently offered for an array of program such as CalFresh (food stamps), CalWorks, Women Infants and Children (WIC), California Healthy Families, Child Care Assistance, MediCal, and Supplemental Nutrition Assistance Program (SNAP). On-site benefit screening appointments continue to be conducted for participants.

### **Financial Education**

#### ***Financial Counseling***

The Achievement Academy employs a WRS that has been certified as a Financial Counselor. The Financial Counselor is able to offer on-site 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***

All 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.

## SECTION V- SOURCES AND USES OF FUNDS

The chart below contains a summary of the results of Achievement Academy activities at the close of Fiscal Year 2018.

Achievement Academy			
Metric	Baseline		Outcome
	#	%	
Number of rental assistance participants receiving core services	982		1,343
Number of rental assistance participants with an increase in earnings	229		377
Number of rental assistance participants placed in employment	144		326
Number of rental assistance participants employed for 12 or more consecutive months	44		46
Number of rental assistance participants who attended a work readiness workshop	727		319
Percent of rental assistance participants who attended a recruitment and resource fair and obtained employment as a direct result		0%	25%
Number of rental assistance participants who completed vocational or bridge training	0		31

## SECTION V – SOURCES AND USES OF FUNDS



### LOCAL ASSET MANAGEMENT PLAN

#### Section V(B). MTW Plan: Local Asset Management Plan

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

Yes

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

No

iii. Did the MTW PHA provide a LAMP in the appendix?

No

iv. 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 2018.

### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

#### Section V(C). MTW Plan: Rental Assistance Demonstration (RAD) Participation

##### i. Description of RAD Participation

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

##### Rental Assistance Demonstration (RAD) Participation Description:

N/A

ii. 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

iii. 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

### MTW BLOCK GRANT COMMITMENTS

SDHC anticipates committing \$30M of MTW Block Grant funds towards the acquisition of three affordable housing units in San Diego. An additional \$6.3M will be budgeted for preservation of SDHC owned affordable housing units. SDHC's evaluation of budgetary conditions (federal, state and local), agency priorities, projections, strategic plan action items, and the availability of viable development opportunities will factor into the allocation of funds towards agency endeavors in Fiscal Year 2020.



**SECTION VI – ADMINISTRATIVE**

- A. **Board Resolution and Certifications of Compliance:** (See Appendix A)
- B. **Documentation of 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**



SAN DIEGO HOUSING COMMISSION

RESOLUTION NO. 1803

ADOPTED ON March 8, 2019

A RESOLUTION APPROVING THE SAN DIEGO HOUSING  
COMMISSION'S FISCAL YEAR 2020 MOVING TO WORK ANNUAL  
PLAN AND RELATED ACTIONS.

WHEREAS, the San Diego Housing Commission (Housing Commission) is one of only 39 public housing authorities (PHAs) nationwide (out of 3,400) to receive a Moving to Work designation from the U.S. Department of Housing and Urban Development (HUD), which grants PHAs the flexibility to design innovative, cost-effective ways of providing federal housing assistance to low-income families; and

WHEREAS, HUD requires Moving to Work agencies to submit an Annual Plan, including all proposed initiatives and revisions to previously approved initiatives; and

WHEREAS, the initiatives in the Housing Commission's Fiscal Year 2020 Moving to Work Annual Plan, described more particularly in Housing Commission Report No. HCR19-026 and its Attachment, are designed to increase housing opportunities for low-income families; and

WHEREAS, the Housing Authority of the City of San Diego previously adopted Resolution HA-1562, effective July 10, 2012 (2012 HA Resolution), which delegated authority to the Housing Commission Board of Commissioners (Housing Commission Board) to "make amendments to and adopt Administrative Plans and MTW [Moving to Work] initiatives" as authorized by San Diego Municipal Code section 98.0301, paragraphs (d)(3) and (d)(7); and

WHEREAS, on February 8, 2019, the Housing Commission Board held an informational public workshop on the proposed Fiscal Year 2020 Moving to Work Annual Plan; and



WHEREAS, on March 8, 2019, consistent with the 2012 HA Resolution, the Housing Commission Board approved the proposed Fiscal Year 2020 Moving to Work Annual Plan and related actions; NOW, THEREFORE,

BE IT RESOLVED by the Housing Commission Board as follows:

1. The Housing Commission's Fiscal Year 2020 Moving to Work Annual Plan is approved.
2. The Housing Commission's President & Chief Executive Officer (President & CEO), or designee, is authorized 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, and to submit the proposed Annual Moving to Work Plan for the period from July 1, 2019, through June 30, 2020, to HUD.

Approved as to Form:

Christensen & Spath LLP

By: 

Charles B. Christensen, General Counsel  
San Diego Housing Commission





OMB Control Number: 2557-0216  
Expiration Date: 01/31/2021

## CERTIFICATIONS OF COMPLIANCE

### U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

#### Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2018), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.



OMB Control Number: 2557-0216  
Expiration Date: 01/31/2021

- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

San Diego Housing Commission  
MTW PHA NAME

CA063  
MTW PHA NUMBER/HA CODE

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Richard C. Gentry  
NAME OF AUTHORIZED OFFICIAL

Chief Executive Officer  
TITLE

[Signature]  
SIGNATURE

4-8-19  
DATE

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



### APPENDIX B

#### DOCUMENTATION OF PUBLIC PROCESS

The San Diego Housing Commission (SDHC) formally solicited public comment on the Fiscal Year 2020 Annual Plan Draft in order to incorporate the ideas of participants, community advocates, and interested citizens into the proposed plan as well as answer questions pertaining to Moving to Work subject matter. A formal public hearing occurred on February 4, 2019 at the SDHC corporate office for the purposes of educating the public and receiving comments. A public notice was circulated in three local publications (Union Tribune, Voice & Viewpoint, and La Prensa) to encourage public involvement. In an attempt to encourage further participation among San Diego residents and program clients, SDHC issued personal invitations to a selected group of participants. The individuals receiving the personal invitations were current rental assistance recipients and therefore were positioned to provide practical suggestions and feedback. All methods of invitation provided residents of San Diego with multiple options for contacting appropriate personnel with comments if unable to attend the public hearing.

The following information will serve as proof of public hearing notice and community participation:

- ✓ Proof of Publication
- ✓ Public Hearing Sign-In Sheets
- ✓ Public Comment Matrix

The public comment period formally commenced on January 31, 2019 when the draft MTW Plan was posted to the SDHC website. Public noticing referenced the location of the draft Plan. The close of the public comment period occurred on March 6, 2019. The public hearing will be conducted at the Achievement Academy located at 1045 11<sup>th</sup> Avenue, San Diego, CA 92101.



## UNION TRIBUNE

# The San Diego Union-Tribune

## PROOF of Publication

**Bill To:**  
SAN DIEGO HOUSING COMMISSION - CU00465011  
1122 Broadway  
SAN DIEGO, CA 92101

**STATE OF ILLINOIS**  
**COUNTY OF Cook**

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he/she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he/she is not a party to, nor interested in the above entitled matter; that he/she is Chief Clerk for the publisher of

## San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instruction of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

**January 17, 2019; January 24, 2019**

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated in the City of Chicago, State of Illinois  
on this 24th of January 2019.

Stefanie Sobiech  
San Diego Union-Tribune  
Legal Advertising

## Proof of Publication of

### PUBLIC NOTICE

The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2020 (July 1, 2019 – June 30, 2020) Annual Plan. The proposed plan will be available for review on SDHC's website, [www.sdhc.org](http://www.sdhc.org) beginning on January 31, 2019. Comments must be submitted by 5 p.m. on March 6, 2019, to be considered by SDHC staff and decision-making authorities in their final review of the proposed plan. Please submit written comments by mail to: Suket Dayal/Moving Forward, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to [Suketd@sdhc.org](mailto:Suketd@sdhc.org).

### SUBJECT

In its MTW Fiscal Year 2020 Annual Plan, SDHC describes activities intended to increase programmatic efficiencies, support self-sufficiency endeavors for rental assistance participants, and expand housing choice options for households with low-income and/or experiencing homelessness in San Diego.

SDHC is soliciting public comment on these planned programmatic activities for Fiscal Year 2020.

**PUBLIC HEARING**  
SDHC will hold a public hearing on the proposed MTW Fiscal Year 2020 Annual Plan on Monday, February 4, 2019, at 9 a.m. at the SDHC Achievement Academy, 1045 11th Avenue, San Diego, CA 92101.

6082039







## LA PRENSA SAN DIEGO

**PROOF OF PUBLICATION  
(2015.5 C.C.P.)**

+  
STATE OF CALIFORNIA,  
COUNTY OF SAN DIEGO,

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, in the above-entitled matter. I am the principal clerk of the printer of La Prensa San Diego, a newspaper of

general circulation, printed and published weekly in the City of San Diego County of San Diego, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of May 9, 1978, Case Number 4137435; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

JAN. 18/2019

all in the year 2019

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at San Diego

California, this FEB. 07/2019

**Enrique González**  
**Chief Operating Officer**  
**La Prensa San Diego**

*P.A. [Signature]*  
**Signature**

This space is for the  
La Prensa San Diego use only

Proof of Publication of:

Notice Of Petition to Administer Estate  
INVOICE# 2407

NOTICE	NOTICE
<p>Dates of Public Notice: January 17, 2019 and January 24, 2019 PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION MOVING TO WORK FISCAL YEAR 2020 PLAN</p>	
<p><b>PUBLIC NOTICE</b> The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2020 (July 1, 2019 - June 30, 2020) Annual Plan. The proposed plan will be available for review on SDHC's website, <a href="http://www.sdhc.org">www.sdhc.org</a> beginning on January 31, 2019. Comments must be submitted by 5 p.m. on March 6, 2019, to be considered by SDHC staff and decision-making authorities in their final review of the proposed plan. Please submit written comments by mail to: Suket Dayal/Moving Forward, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to <a href="mailto:Suketd@sdhc.org">Suketd@sdhc.org</a></p>	
<p><b>SUBJECT</b> In its MTW Fiscal Year 2020 Annual Plan, SDHC describes activities intended to increase programmatic efficiencies, support self-sufficiency endeavors for rental assistance participants, and expand housing choice options for households with low-income and/or experiencing homelessness in San Diego. SDHC is soliciting public comment on these planned programmatic activities for Fiscal Year 2020.</p>	
<p><b>PUBLIC HEARING</b> SDHC will hold a public hearing on the proposed MTW Fiscal Year 2020 Annual Plan on Monday, February 4, 2019, at 9 a.m. at the SDHC Achievement Academy, 1045 11th Avenue, San Diego, CA 92101.</p>	

**MTW Public Hearing**  
February 4, 2019  
MTW FY 2020 Plan

[illegible]



## PUBLIC COMMENT MATRIX

Group/ Agency	Questions/ Comments Received	SDHC Responses
Jim Quigley	Assistance with employment services at Connections. Expressed frustration over access issues. Thanked Housing Commission for assistance on his home loan (a couple years prior). Wanted more done for homelessness.	SDHC has awarded PBV's and Transitional Project Based Subsidies at Connections. PATH provides an array of services including, but not restricted to case management, employment support, mental health services and more.





## APPENDIX C

## LOBBYING DISCLOSURES

## DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352  
(See reverse for public burden disclosure.)

Approved by OMB  
0348-0046

<b>1. Type of Federal Action:</b> <input checked="checked" type="checkbox"/> a. contract <input 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 checked="checked" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input checked="checked" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="checked" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  San Diego Housing Commission 1122 Broadway, Suite 300 San Diego, CA 92101 Congressional District, if known: 4c CA-52			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>   Congressional District, if known:		
<b>6. Federal Department/Agency:</b> U.S. Department of Housing and Urban Development			<b>7. Federal Program Name/Description:</b> FY 2020 MTW Block Grant CFDA Number, if applicable: N/A		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$ 174,709,820		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):  N/A			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature:  Print Name: Richard C. Gentry Title: President and Chief Executive Officer Telephone No.: 619-578-7531 Date: 04/02/2019		
<b>Federal Use Only:</b>				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	



### APPENDIX D

#### NON-MTW RELATED SDHC INFORMATION

##### **City of San Diego Strategic Plan on Homelessness**

On behalf of the City of San Diego (City), the San Diego Housing Commission (SDHC) is overseeing the development of a comprehensive Strategic Plan for the City to address homelessness.

A high-level consultant with national recognition and broad expertise in the area of homelessness has been identified to direct the creation of the Strategic Plan. Ann Oliva is the Senior Policy Advisor to the CEO of the Corporation for Supportive Housing (CSH). CSH is a nationally recognized affordable housing industry consulting and planning agency that partners with communities on long- and short-term special initiatives to solve local housing and homelessness issues. Ms. Oliva currently focuses on supporting jurisdictions to increase local capacity to develop system-level responses to homelessness. Under the City of San Diego initiative, Ms. Oliva will lead a team of multidisciplinary experts from CSH to develop a comprehensive Strategic Plan to address homelessness within the City.

Prior to joining CSH, Ms. Oliva was the Deputy Assistant Secretary for Special Needs at the U.S. Department of Housing and Urban Development (HUD), where she oversaw a multibillion-dollar portfolio that included HUD's work on homelessness and housing for persons living with HIV/AIDS. During her 10-year tenure at HUD, Ms. Oliva successfully designed and implemented a variety of initiatives and programs, including a \$1.5 billion homelessness prevention and rapid rehousing program funded through the American Recovery and Reinvestment Act. In 2015, Ms. Oliva was named one of the 50 Most Influential Leaders in HUD's 50-year history.

SDHC leadership have discussed with Ms. Oliva and her team the contract expectations, Scope of Work, and deliverables. A core steering group has been developed that includes representatives from the Mayor's office, the office of the Chair of the City Council's Select Committee on Homelessness, the Regional Task Force on the Homeless (RTFH) and SDHC. The steering group is meeting weekly to discuss the objectives of the plan and to define and detail the Scope of Work and contract expectations.



The objective of this effort is to develop a comprehensive strategy to address homelessness in the City of San Diego, which identifies actionable approaches to address short- and long-term homelessness issues.

Significant solicitation of stakeholder input is critical to Strategic Plan development. Participation in the steering group builds into the project the leadership involvement from the Mayor's office, the City Council, the RTFH and the Housing Commission. However, the planning process will also include robust activities in gathering input and critical areas of focus from key stakeholders.

The final, complete version of the proposed City Strategic Plan on Homelessness is expected to be presented to the City Council in summer 2019.

### **\$50 Million Investment for Affordable Housing**

On September 4, 2018, SDHC announced that up to \$50 million administered by the agency is available through three Notices of Funding Availability (NOFA) for the creation and preservation of affordable rental housing, including units to address homelessness.





*SDHC Notices of Funding Availability  
News Conference – September 4, 2018*

The available development funding consists of:

- **Up to \$20 million to create affordable rental housing with supportive services for San Diegans experiencing homelessness.** These funds are part of the current phase of [HOUSING FIRST – SAN DIEGO](#), SDHC’s homelessness action plan, which launched on July 1, 2017. This NOFA also includes 525 federal rental housing vouchers committed by SDHC to provide rental assistance for San Diegans experiencing homelessness. Of these, 25 vouchers are for homeless Veterans through SDHC’s partnership with the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Veterans Affairs (VA). HOUSING FIRST – SAN DIEGO included the commitment of up to \$30 million in development funds over three years. The first \$10 million was available during Fiscal Year (FY) 2018. This NOFA consists of SDHC’s HOUSING FIRST – SAN DIEGO development funding commitments for FY 2019 and FY 2020 and will remain open for applications until September 4, 2020, or until all available funds/vouchers have been committed, whichever occurs first. Sources of funds include local funds from the City of San Diego’s Affordable Housing Fund, administered by SDHC, and federal HOME Investment Partnerships Program funds, awarded by HUD to the City of San Diego and administered by SDHC.
- **Up to \$20 million to create affordable rental housing for low-income San Diegans.** These funds will be awarded to developments that create rental housing units that are affordable for San Diegans with income up to 60 percent of San Diego’s Area Median Income (AMI), currently \$58,380 for a four-person household. Revenue from the City’s Inclusionary Housing Fund (fee collections and program income) was more than \$9 million higher than anticipated in FY 2018, which enabled SDHC to increase the funds available through this NOFA to \$20 million. This NOFA was open for applications until December 4, 2018, to prioritize projects that are the closest to being ready to begin development. SDHC is reviewing funding applications at this time. Additional potential sources of funds for this NOFA include HOME funds.



- **Up to \$10 million to rehabilitate affordable rental housing and/or extend its affordability.** These funds will be awarded to projects that involve the acquisition and rehabilitation of existing rental housing properties that will remain affordable for 55 years for households with income up to 80 percent of AMI, currently \$77,850 for a four-person household. The source of funding for this NOFA is federal Community Development Block Grant Affordable Housing Revolving Loan Funds, allocated by HUD to the City of San Diego and directed to SDHC to reimburse expenses funded by SDHC for the City's Temporary Bridge Shelters. This NOFA was open for applications until December 4, 2018, to prioritize projects that are the closest to being ready to begin rehabilitation. SDHC is reviewing funding applications at this time.

### **SDHC President & CEO Named Chairman of National Affordable Housing Advisory Council**

SDHC President & CEO Richard C. Gentry will serve in 2019 as the Chairman of a new council that will advise Fannie Mae on how to best support the creation and preservation of affordable housing.

The Public Housing Authorities Duty to Serve Advisory Council, which includes at least 10 public housing agency representatives from throughout the United States, will meet with Fannie Mae leadership and staff to discuss affordable housing issues.

The council was formed under the Duty to Serve Program of the Federal Housing Finance Agency – which oversees Fannie Mae and Freddie Mac. The Duty to Serve Program was created in response to the Housing and Economic Recovery Act of 2008.

The program requires Fannie Mae and Freddie Mac to engage in lending to support housing opportunities for low- and moderate-income households, focusing on three underserved housing markets: Affordable Housing Preservation, Manufactured Housing, and Rural Housing.

Fannie Mae's objectives and priorities for affordable housing preservation are included in a report, *Duty to Serve Underserved Markets Plan for the Affordable Housing Preservation Market*.



As the Chairman of the Public Housing Authorities Duty to Serve Advisory Council for 2019, Mr. Gentry will be responsible for guiding the topics on the council's agenda and, along with the vice chair, approving requests for substitutions or changes to council membership.

Mr. Gentry was named to the council in October 2018 for a two-year term.





U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Mr. Richard Gentry  
Executive Director  
San Diego Housing Commission  
1122 Broadway, Suite 300  
San Diego, CA 92101

JUN 28 2019

Re: San Diego Housing Commission FY 2020 Annual MTW Plan Approval

Dear Mr. Gentry:

The Department of Housing and Urban Development has completed its review of the San Diego Housing Commission's (SDHC) Annual Moving to Work (MTW) Plan for Fiscal Year 2020, initially submitted on April 12, 2019, with revisions submitted on May 13, 2019, June 6, 2019 and June 26, 2019. I am writing to inform you that the Plan, as submitted on June 26, 2019, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local-nontraditional activities in compliance with PIH 2011-45. In providing assistance to families under programs covered by this Plan, SDHC must comply with the rules, standards and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at SDHC's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. Please contact Jeree Turlington, your MTW Coordinator, at 202-402-5270 if you have any questions.

Sincerely,

Marianne Nazzaro  
Moving to Work Program Director  
Office of Public Housing Investments

cc:  
Marcie Chavez, Los Angeles PIH Field Office