



SAN DIEGO  
HOUSING  
COMMISSION

# Moving Forward Moving To Work Program Annual Plan for Fiscal Year 2021

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# TABLE OF CONTENTS



<b>Section I – Introduction and Agency Goals .....</b>	<b>1</b>
Message from the President & CEO .....	1
Short-Term and Long-Term MTW Goals .....	2
<b>Section II – General Operating Information .....</b>	<b>5</b>
A. Housing Stock Information Matrix.....	5
B. Leasing Information Matrix.....	8
C. Waiting List Information Matrix .....	9
<b>Section III – Proposed MTW Activities: HUD Approval Requested .....</b>	<b>10</b>
2021-1: Establishment of Alternative Reasonable Cost Limits.....	10
2021-2: Preservation of Affordable Housing in the City of San Diego .....	12
<b>Section IV – Approved MTW Activities .....</b>	<b>14</b>
Implemented Activities.....	14
Not Yet Implemented Activities .....	24
Activities on Hold.....	24
Closed Out Activities.....	25
<b>Section V – Sources and Uses of MTW Funds.....</b>	<b>28</b>
Estimated Sources and Uses of MTW Funds .....	28
Single Fund Flexibility Narrative .....	29
Local Asset Management Plan .....	31
Rental Assistance Demonstration (RAD) Participation .....	32
<b>Section VI – Administrative .....</b>	<b>33</b>
A. Board Resolution and Certifications of Compliance .....	33
B. Documentation and Public Process .....	33
C. Planned or Ongoing Evaluations.....	33
D. Lobbying Disclosures .....	33
<b>Appendix A: Board Resolution and Certifications of Compliance.....</b>	<b>34</b>
<b>Appendix B: Documentation and Public Process.....</b>	<b>39</b>
<b>Appendix C: Lobbying Disclosures .....</b>	<b>44</b>
<b>Appendix D: Non-MTW Related SDHC Information .....</b>	<b>45</b>
<b>Appendix E: Supporting Documentation for Proposed Activities.....</b>	<b>49</b>

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## SECTION I – INTRODUCTION AND AGENCY GOALS

### MESSAGE FROM THE PRESIDENT & CEO

The San Diego Housing Commission's (SDHC) Moving to Work (MTW) status is the foundation for many of SDHC's innovative approaches to provide housing assistance and address homelessness in the City of San Diego.



With MTW flexibility, SDHC created the SDHC Achievement Academy, a learning and resource center and computer lab that provides programs emphasizing career planning, job skills, job placement and personal financial education. The SDHC Achievement Academy served more than 2,000 people in the last fiscal year, including Tre Léna, who completed a Certified Nursing Assistant course and is working toward returning to a career in nursing. "I have a future, thanks to the Housing Commission," she said.

MTW initiatives also are important parts of SDHC's homelessness action plan, HOUSING FIRST – SAN DIEGO, which has created more than 7,600 housing opportunities in less than five years for San Diegans experiencing homelessness. For example, Lola and her three daughters, who had been living in a van in a safe parking lot, moved into an apartment of their own with help from the SDHC Moving Home Rapid Rehousing Program, one of our MTW initiatives. "We're able to have a sense of normalcy, a sense of security we didn't have before," Lola said.

In addition, SDHC's Path to Success initiative encourages families to become more financially self-reliant, and SDHC's Choice Communities Initiative provides rental assistance households with more flexibility to choose to live in neighborhoods that offer more opportunities for transportation, schools and employment.

These are just a few of SDHC's MTW initiatives. With the additional initiatives proposed in this Fiscal Year 2021 MTW Annual Plan, SDHC will continue to have a positive impact on the lives of the families we serve. At SDHC, We're About People.

Sincerely,

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



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

#### LONG-TERM GOALS

##### SDHC STRATEGIC PLAN

On September 6, 2019, the San Diego Housing Commission (SDHC) Board of Commissioners appointed Chair of the Board Stefanie Benvenuto, Vice Chair of the Board Ryan Clumpner and Commissioner Johanna Hester to SDHC's Strategic Plan Committee. This Committee will provide essential guidance and direction as SDHC develops its next agency wide Strategic Plan.

The new Strategic Plan will build upon the accomplishments of the Strategic Plan the SDHC Board of Commissioners approved in 2016, which identified three major goals:

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

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

Through a contract with SDHC on behalf of the City of San Diego (City), the Corporation for Supportive Housing (CSH), a nationally recognized consultant with broad expertise in the area of homelessness, developed the City's Community Action Plan on Homelessness.

On October 14, 2019, the San Diego City Council unanimously approved this Community Action Plan on Homelessness.

The initial development of this plan included the creation of a Steering Committee that consisted of key staff members from the office of Mayor Kevin L. Faulconer, the office of San Diego City Councilmember Chris Ward, the Regional Task Force on the Homeless, and SDHC. The Steering Committee supported the work of CSH through all phases of the plan development.

This plan identifies a vision, recommended actions, guiding principles, key strategies, "goals within reach" to accomplish within three years, as well as proposed actions and estimated costs over the next 10 years to address homelessness.

##### VISION

By working creatively and collaboratively, the City of San Diego will build a client-centered homeless assistance system that aims to prevent homelessness, and that quickly creates a path to safe and affordable housing and services for people who experience homelessness in our community.

##### PERMANENT HOUSING NEEDS

- 5,416 permanent housing opportunities needed over the next 10 years for individuals and families experiencing homelessness:
  - New or rehabilitated supportive housing
  - Supportive housing leased in the private rental market
  - Rapid rehousing rental assistance with services for one year
  - Low-income housing rental assistance with services for three years
  - Homelessness diversion assistance
- Estimated cost: \$1.9 billion over 10 years

##### CRISIS RESPONSE ACTIONS

- 350-500 new crisis response beds or services needed to meet the needs of individuals and families experiencing homelessness and the estimated annual inflow into emergency shelters.
- Estimated cost: Approximately \$2.2 million per 100 new beds in annual operating costs
  - Potential additional capital costs if new sprung structures are needed for shelters.



### SHORT-TERM GOALS

#### ADDRESSING HOMELESSNESS

The City of San Diego's Community Action Plan on Homelessness, which the San Diego City Council approved unanimously on October 14, 2019, identifies three "Goals Within Reach" that can be achieved within three years:

1. Decrease unsheltered homelessness by 50 percent
2. Finish the job of ending veteran homelessness
3. Prevent and end youth homelessness as outlined in the San Diego County Coordinated Community Plan to End Youth Homelessness

#### CREATING & PRESERVING AFFORDABLE HOUSING

SDHC creates and preserves affordable rental housing by investing loans, authorizing the issuance of Multifamily Housing Revenue Bonds, and administering City of San Diego affordable housing programs.

As of October 2019, 24 SDHC partnership developments had been approved and/or were under construction to create or preserve 2,631 affordable housing units, with completions anticipated by summer of 2022:

- 14<sup>TH</sup> AND COMMERCIAL (new construction) – 323 affordable units for households with income up to 50 percent of San Diego Area Median Income (AMI), including 230 permanent supportive housing units for San Diegans experiencing homelessness
- 14C VHHP APARTMENTS (new construction) – 80 affordable units for individuals with income up to 60 percent of AMI, of which 40 units will be permanent supportive housing units for individuals experiencing chronic homelessness and veterans experiencing homelessness
- EAST BLOCK SENIOR APARTMENTS (new construction) – 115 affordable units for seniors with income up to 60 percent of AMI
- EAST BLOCK FAMILY APARTMENTS (new construction) – 77 affordable units for households with income up to 60 percent of AMI
- ENCANTO VILLAGE (new construction) – 65 affordable units for households with income up to 40 percent of AMI, including eight permanent supportive housing units for veterans experiencing homelessness
- HARBOR VIEW VILLAS (rehabilitation) – 59 affordable units for households with income up to 60 percent of AMI
- HILLSIDE VIEWS APARTMENTS (rehabilitation) – 297 affordable units for households with income up to 60 percent of AMI
- HOLLISTER APARTMENTS (rehabilitation) – 82 permanent supportive housing units for San Diegans experiencing homelessness with income up to 30 percent of AMI
- IVY SENIOR APARTMENTS (new construction) – 52 permanent supportive housing units for seniors experiencing homelessness with income up to 50 percent of AMI
- JAMBOREE SAN YSIDRO PERMANENT SUPPORTIVE HOUSING APARTMENTS (new construction) – 64 permanent supportive housing units for San Diegans with mental disabilities experiencing homelessness with income up to 25 percent of AMI
- KEELER COURT APARTMENTS (new construction) – 70 affordable units for households with income up to 60 percent of AMI, including seven permanent supportive housing units for veterans experiencing homelessness
- THE LINK (new construction) – 86 affordable units for households earning up to 50 percent of AMI, including 72 permanent supportive housing units for San Diegans experiencing homelessness
- MARINER'S VILLAGE (rehabilitation) – 171 affordable units for households with income up to 80 percent of AMI
- PARK AND MARKET (new construction, mixed income) – 85 affordable units for households with income up to 50 percent of AMI
- PASEO LA PAZ (new construction) – 137 affordable units for households with income up to 60 percent of AMI
- QUALITY INN (rehabilitation) – 91 permanent supportive housing units for transition-age youth, veterans, seniors, and adults with mental disabilities who are experiencing homelessness with income up to 80 percent of AMI (awarded MTW grant funds)
- REGENCY CENTRE (rehabilitation) – 99 affordable units for seniors with income up to 60 percent of AMI
- SAN YSIDRO SENIOR VILLAGE (new construction) – 50 permanent supportive housing units for seniors experiencing homelessness with income up to 50 percent of AMI

## SECTION I – INTRODUCTION AND AGENCY GOALS

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- SCRIPPS MESA APARTMENTS (new construction, mixed income) – 53 affordable units for households with income up to 50 percent of AMI
- STYLUS APARTMENTS (new construction, mixed income) – 201 affordable units for households with income up to 60 percent of AMI
- TRINITY APARTMENTS (new construction) – 73 permanent supportive housing units for San Diegans experiencing homelessness with income up to 30 percent of AMI
- ULRIC STREET APARTMENTS (new construction) – 95 affordable units for households with income up to 60 percent of AMI
- WEST PARK (rehabilitation) – 46 permanent supportive housing units for seniors and adults with mental disabilities who are experiencing homelessness with income up to 60 percent of AMI
- WESLEY TERRACE (rehabilitation) – 159 affordable units for households with income up to 60 percent of AMI





## SECTION II – GENERAL OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION MATRIX

#### I. PLANNED NEW PUBLIC HOUSING UNITS

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

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# OF UFAS UNITS	
	0/0	2	3	4	5	6+			FULLY 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



## A. HOUSING STOCK INFORMATION MATRIX

### III. PLANNED NEW PROJECT-BASED VOUCHERS

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an AHAP will be in place by the end of the Plan Year.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
JAMBOREE-SAN YSIDRO	64	No	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
TOWNSPEOPLE	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	27	Leased/Issued	N/A	Low-Income
CONNECTIONS HOUSING	73	Leased/Issued	N/A	Homeless
MASON HOTEL	16	Leased/Issued	N/A	Homeless
PARKER-KIER	22	Leased/Issued	N/A	Homeless
CELADON	88	Leased/Issued	N/A	Homeless
ALPHA SQUARE	76	Leased/Issued	N/A	Homeless
NEW PALACE HOTEL	79	Leased/Issued	N/A	Homeless
VILLAGE NORTH SENIOR	44	Leased/Issued	N/A	Homeless
ATMOSPHERE	51	Leased/Issued	N/A	Homeless
TALMADGE 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
STELLA	79	Leased/Issued	N/A	Homeless
THE LINK	72	Leased/Issued	N/A	Homeless
SAN YSIDRO SENIOR	50	Leased/Issued	N/A	Homeless
HOLLISTER/BENSON	82	Leased/Issued	N/A	Homeless
IVY APARTMENTS	52	Leased/Issued	N/A	Homeless
VENTANA AL SUR	25	Leased/Issued	N/A	Homeless
TRINITY PLACE	73	Leased/Issued	N/A	Homeless
14 <sup>TH</sup> & COMMERCIAL	230	Leased/Issued	N/A	Homeless

1,752

PLANNED TOTAL EXISTING PROJECT-BASED VOUCHERS

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



**A. HOUSING STOCK INFORMATION MATRIX**

**V. PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR**

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

No changes anticipated.

**VI. GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR**

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

SDHC anticipates Capital Fund Program formula funds will be used to fund the soft costs, the hard costs and administrative costs of various renovation activities throughout the (8) Public Housing properties consisting of (189) public housing units. Hard costs may include upgrades 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 may include architecture and engineering and third party consultants for due diligence related activities. The property and scope selection is to be determined.



## B. LEASING INFORMATION MATRIX

## I. PLANNED NUMBER OF HOUSEHOLDS SERVED

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	2,200	185
MTW Housing Choice Vouchers Utilized	159,036	13,253
Local, Non-Traditional: Tenant-Based^	11,496	958
Local, Non-Traditional: Property-Based^	12,072	1,006
Local, Non-Traditional: Homeownership^	0	0
<b>PLANNED TOTAL HOUSEHOLDS SERVED</b>	<b>184,824</b>	<b>15,402</b>

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

\*\* "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Sponsor-Based Subsidy Program / 2011-8	8,736	728
Tenant-Based	Transitional Project-Based Subsidy Program / 2013-6	564	47
Tenant-Based	Monarch Housing Program / 2016-1	300	25
Tenant-Based	Guardian Scholars Program / 2016-2	1,020	85
Tenant-Based	Moving On Program / 2017-1	420	35
Tenant-Based	Moving Home Program / 2018-1	456	38
Property-Based	Affordable Housing Development / 2011-4	12,072	1,006
<b>PLANNED/ACTUAL TOTALS</b>		<b>23,568</b>	<b>1,964</b>

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

## II. DISCUSSION OF ANY ANTICIPATED ISSUES / POSSIBLE SOLUTIONS RELATED TO LEASING

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	Rental market conditions (high rental cost, low vacancy) may increase difficulty finding rental units for MTW HCV participants. Solutions: City of San Diego and California State Source of Income laws, Mobility Counseling Program, LEAP, anticipated increase in payment standards in FY20.
Local, Non-Traditional	Rental market conditions (high rental cost, low vacancy) may increase difficulty finding rental units for MTW local Non-Traditional participants. Solutions: City of San Diego and California State Source of Income laws, Mobility Counseling Program, LEAP, anticipated increase in payment standards in FY20.



## C. WAITING LIST INFORMATION MATRIX

### I. WAITING LIST INFORMATION ANTICIPATED

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

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED
Housing Choice Voucher: Tenant-Based	Community Wide	105,705	Open
Housing Choice Voucher: Project-Based	Site-Based	61,589	Open
Housing Choice Voucher: Project-Based	Site-Based	18	Closed
Public Housing	Community Wide	78,488	Open
Local Non-Traditional	Community Wide	0	Closed

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

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

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

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Housing Choice Voucher: Tenant-Based	Waiting List Purge/Refresh in Progress
Housing Choice Voucher: Project-Based	Waiting List Purge/Refresh in Progress
Housing Choice Voucher: Project-Based	Waiting List Purge/Refresh in Progress
Public Housing	None
Local Non-Traditional	None



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

### 2021-1: ESTABLISHMENT OF ALTERNATIVE REASONABLE COST LIMITS

#### A. Activity Description

SDHC is requesting permission to develop alternative reasonable cost limits to include Total Development Costs (TDC) and Hard Construction Costs (HCC) for the amount of Moving to Work funds that can be contributed in SDHC's local non-traditional development and rehabilitation activities. Over the past several years, the San Diego metropolitan area has seen massive increases in the cost to develop and rehabilitate new and existing properties. SDHC has seen multiple projects far exceed the HUD-published limits for the San Diego region, as the Rental Housing Finance Division is a lender, conduit bond issuer, and administrator of the City of San Diego's affordable land use programs including the Inclusionary, Density Bonus, Single-Room Occupancy, and Coastal Replacement Housing ordinances. In seeking an alternative reasonable cost formula, SDHC will be able to increase its ability to ensure that more affordable units are developed or rehabilitated within the City of San Diego, which in turn will increase the number of housing choice for low-income families in support of the MTW Statutory Objective.

SDHC has conducted an analysis using the TDC and HCC of rehabilitations and new developments going back to 2017 as reported in board reports to the SDHC Board of Commissioners. A list of the projects used for this analysis can be found in Appendix E. SDHC's board reports contain project square footage, unit mix, total development costs, and total hard costs. The board report total development costs include developer and legal fees. The TDC per project that SDHC references in the appendix reflect the total development cost within the board report without these fees included. The cost per square foot for each project was determined by taking the TDC without developer and legal fees and HCC, and dividing it by the square footage.

SDHC then determined the average TDC and HCC of all Elevator and Walkup projects by averaging the HCC per square foot and TDC per square foot. This average cost per square foot includes both development and rehabilitation projects for each HUD-defined development type. The final average by square foot for SDHC's projects can be viewed in the table below:

SDHC AVERAGE COST PER SQUARE FOOT		
DEVELOPMENT TYPE*	HARD CONSTRUCTION COST (HCC)	TOTAL DEVELOPMENT COST (TDC)
WALKUP	\$131.92	\$358.80
ELEVATOR	\$287.04	\$474.22

SDHC determined the cost per unit size using HUD's TDC/HCC square footage per unit size as prescribed by HUD. The average TDC or HCC per square foot determined for each development type was multiplied by the respective square foot by unit size. The resulting table of SDHC's proposed HCC/TDC limits can be seen below for the most commonly seen unit sizes. A full table is provided in Appendix E.

SDHC REASONABLE COST LIMITS FOR MTW FUNDS (PROPOSED)								
DEVELOPMENT TYPE	0 BEDROOM 500 Sq. Ft.		1 BEDROOM 700 Sq. Ft.		2 BEDROOM 900 Sq. Ft.		3 BEDROOM 1200 Sq. Ft.	
	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)
WALKUP	62,997	179,399	88,196	251,159	113,395	322,918	151,194	430,557
ELEVATOR	145,476	237,112	203,666	331,956	261,856	426,801	349,142	569,068

Below, for comparison is an excerpt of the HUD TDC limits table published for 2019 for the most common types of units seen in the City of San Diego.

HUD 2019 TDC/HCC LIMITS								
DEVELOPMENT TYPE	0 BEDROOM 500 Sq. Ft.		1 BEDROOM 700 Sq. Ft.		2 BEDROOM 900 Sq. Ft.		3 BEDROOM 1200 Sq. Ft.	
	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)	HCC (\$)	TDC (\$)
WALKUP	81,058	141,852	110,721	193,761	140,175	245,306	184,728	323,274
ELEVATOR	91,130	145,807	127,581	204,130	164,033	262,453	218,711	349,938

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



The implementation of a local reasonable cost formula to replace HUD TDC/HCC limits will allow SDHC to better collaborate with other entities in order to provide funding needed to acquire and renovate properties for affordable housing. In order to ensure that affordable cost limits accurately reflect the San Diego market, SDHC will continue to utilize the development cost information for Walkup and Elevator projects found in reports to the SDHC Board of Commissioners. As our initial analysis uses a three year lookback period, SDHC will continue to evaluate reasonable cost limits by reviewing all development and rehabilitation projects utilizing SDHC funds over a three year lookback from the Plan year. This analysis will provide SDHC with a current average TDC and HCC per square foot as categorized by development type, which will then be multiplied by HUD's square footage per unit size.

If changes need to be made to this methodology, SDHC will seek approval from HUD on proposed updates. Once SDHC has received approval from HUD, SDHC will utilize the approved methodology on an annual basis in order to determine the reasonable cost limits for that period.

### 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 being developed within the City of San Diego.

### Anticipated Timeline to Achieve Objectives

Once approved, the creation of updated reasonable cost limits in future years can be determined using updated development costs. If SDHC plans to update the methodology used to formulate the reasonable cost limits, SDHC will provide the proposed methodology to HUD's review and approval.

## B. Activity Metrics Information

ESTABLISHMENT OF ALTERNATIVE REASONABLE COST LIMITS			
METRIC	BASELINE	BENCHMARK	OUTCOME
<b>CE #1: Agency Cost Savings</b> <i>Total cost of task in dollars (decrease)</i>	\$0	\$0	
<b>CE #2: Staff Time Savings</b> <i>Total time to complete the task in staff hours (decrease)</i>	0	0	
<b>HC #1: Additional Units of Housing Made Available</b> <i>Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.</i>	0	150	
<b>HC #2: Units of Housing Preserved</b> <i>Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.</i>	0	150	
<b>HC #3: Decrease in Wait List Time</b> <i>Average applicant time on wait list in months (decrease).</i>	74	60	
<b>HC #4: Displacement Prevention</b> <i>Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.</i>	0	150	
<b>HC #5: Increase in Resident Mobility</b> <i>Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).</i>	0	200	

### Measures

- CE #1: SDHC is not expecting to see agency cost savings as a result of the activity
- CE #2: SDHC is not expecting to see staff time savings as a result of the activity
- HC #1: The total number of units developed as a result of the activity.
- HC #2: The total number of units rehabilitated as a result of the activity.



- HC #3: Average number of months on waitlist
- HC #4: The total number of currently affordable units rehabilitated
- HC #5: Total number of units developed or rehabilitated using MTW funds in Choice and Enterprise communities

### Description of Data Sources for Metrics

Board Reports presented to the SDHC Board of Commissioner provide total development costs, hard construction costs, square footage, and the number of units developed for each project. In addition, this information will be tracked in Salesforce that will be exported to Excel for analysis. Data will be analyzed on an annual basis.

### C. Cost Implications

This activity will result in an accurate reflection of costs to develop and rehabilitate affordable housing in San Diego.

### D. Need/Justification for MTW Flexibility

The Amended and Restated Moving to Work Agreement, Attachment C, Section C(16) and the Broader Uses of Funds Authority provides authorization for SDHC to establish reasonable cost formulas for development and rehabilitation activities.

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

N/A

## 2021-2: PRESERVATION OF AFFORDABLE HOUSING IN THE CITY OF SAN DIEGO

### A. Activity Description

In recent years, the City of San Diego has seen market rates for rental housing drastically increase over historical rents. SDHC has begun to see cases where property owners of units that are currently affordable are either increasing rents on long-term tenants in order to adjust their properties to current market rates, or are selling properties for development into hotels or market-rate housing units. As demand continually rises within the City of San Diego, especially in neighborhoods where owners have units that have remained affordable for a long time, there is an increasing chance of losing affordable housing to private sector.

SDHC seeks HUD approval to create a Local Non-Traditional, Property-Based activity to provide financing for the preservation and rehabilitation of properties that are not owned by SDHC. In seeking funding for preservation or rehabilitation, landlords will be incentivized to maintain the affordability of the units and improve housing stock as they provide safe, decent and sanitary dwelling units.

SDHC is committed to preserving affordable housing within the City of San Diego, by developing methods of financing to incentivize property owners to preserve their existing affordable housing units. Financing received through SDHC will help these property owners complete necessary health and safety upgrades to dwelling units that could be normally be cost-prohibitive, leading to an increase in rent for tenants. In receiving this funding, this ensures that properties receiving SDHC funds remain affordable to low-income families for the foreseeable future.

The types of affordable housing preserved via the re-proposed initiative will be restricted to families up to 80 percent of the Area Median Income (AMI).

### Statutory Objectives

The activity will achieve the statutory objective of increasing housing choice for low-income families since the activity will result in rental housing units being preserved within the City of San Diego.

### Anticipated Timeline to Achieve Objectives

SDHC is planning to release a NOFA aimed at preservation during Fiscal Year 2021.



**B. Activity Metrics Information**

PRESERVING AFFORDABLE HOUSING			
METRIC	BASELINE	BENCHMARK	OUTCOME
<b>HC #1: Additional Units of Housing Made Available</b> <i>Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.</i>	0	50	
<b>HC #2: Units of Housing Preserved</b> <i>Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.</i>	0	100	
<b>HC #3: Decrease in Wait List Time</b> <i>Average applicant time on wait list in months (decrease).</i>	74	60	
<b>HC #4: Displacement Prevention</b> <i>Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.</i>	0	100	
<b>HC #5: Increase in Resident Mobility</b> <i>Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).</i>	0	100	

**Projected Outcomes**

- HC #1: Number of naturally occurring affordable housing (NOAH) and market rate units being preserved
- HC #2: Number of current deed-restricted and properties with expiring covenants being preserved
- HC #3: Average number of months on waitlist
- HC #4: Number of units receiving preservation funds
- HC #5: Number of units receiving preservation funds in Choice and Enterprise communities

**Description of Data Sources for Metrics**

Internal databases will provide the total number of dollars used to provide preservation assistance, total units preserved, and the number of households assisted by the policy.

**C. Cost Implications**

This activity will result in added costs due to SDHC funds being directed to address preservation of existing non-SDHC affordable housing within the jurisdiction.

**D. Need/Justification for MTW Flexibility**

The Amended and Restated Moving to Work Agreement, Attachment C, Sections B(1)(a), B(1)(b)(ii), B(1)(b)(iv), B(1)(b)(v), B(1)(b)(vi), B(1)(b)(vii), B(1)(b)(viii), B(1)(c), B(1)(d), B(1)(e), B(2), B(3) and B(4) for Single Fund Budget with Full Flexibility waiving certain provisions of Sections 8 and 9 of the 1937 Act and 24 C.F.R. 982, and 990 as necessary to provide for preservation assistance. In addition, the Broader Uses of Funds Authority amendment enables SDHC to develop methods of financing to assist in preserving existing affordable housing. SDHC will adhere to all requirements set forth in PIH Notice 2011-45 for Local Non-Traditional development programs.

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

N/A



## SECTION IV – APPROVED MTW ACTIVITIES

### IMPLEMENTED ACTIVITIES

<b>2020-1.</b> Landlord Retention and Incentive Program .....	15
<b>2018-1.</b> Moving Home: A Rapid Rehousing Program .....	15
<b>2017-1.</b> The Moving On Program.....	15
<b>2016-3.</b> Permanent Indoor Homeless Shelter Beds .....	15
<b>2016-2.</b> The Guardian Scholars Program.....	15
<b>2016-1.</b> The Monarch School Project.....	16
<b>2015-1.</b> Modify the 40 Percent Rent Burden Requirement.....	16
<b>2014-2.</b> Local Income Inclusion.....	16
<b>2013-6.</b> Transitional Project-Based Subsidies for the Homeless.....	16
<b>2013-4.</b> Public Housing: Flat Rent Elimination.....	17
<b>2013-2.</b> Family Self-Sufficiency Reinvention.....	17
<b>2013-1.</b> MTW VASH Program .....	17
<b>2012-3.</b> Modify Full-Time Student Definition .....	17
<b>2012-2.</b> Biennial Reexamination Schedule .....	18
<b>2012-1.</b> Path to Success .....	18
<b>2011-8.</b> Sponsor-Based Subsidies for the Homeless .....	18
<b>2011-7.</b> Development of Public Housing Units Using a Combination of Funds .....	19
<b>2011-6.</b> Modify EIV Income Review Schedule .....	19
<b>2011-4.</b> Acquisition of Additional Affordable Units .....	19
<b>2011-3.</b> Two Year Occupancy Term for PBV Tenants .....	20
<b>2011-2.</b> Authorize Commitment of PBV to SDHC-Owned Units .....	20
<b>2011-1.</b> Allow Lower Rents for Non-Assistant Units in SDHC-Owned Developments.....	20
<b>2010-9.</b> Expand the Project-Based Voucher Program .....	21
<b>2010-7.</b> Adopt a Local Interim Certification Policy.....	21
<b>2010-6.</b> Simplify Income and Asset Verification Systems to Reduce Administrative Burden .....	22
<b>2010-5.</b> Standardize Utility Allowances by Unit Size.....	22
<b>2010-4.</b> Choice Communities.....	22
<b>2010-2.</b> Authorize the SDHC to Inspect and Determine Rent Reasonableness for SDHC Owned Properties.....	22
<b>2010-1.</b> Implement a Revised Inspection Protocol .....	23



## IMPLEMENTED ACTIVITIES

### 2020-1. LANDLORD RETENTION AND INCENTIVE PROGRAM

**PLAN YEAR APPROVED:** 2020

**RE-PROPOSED:** N/A

#### DESCRIPTION

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.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2018-1. MOVING HOME: A RAPID REHOUSING PROGRAM

**PLAN YEAR APPROVED:** 2018

**RE-PROPOSED:** N/A

#### DESCRIPTION

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.

#### Prior Updates

- FY 2020: The program budget was increased to \$5 million in a technical amendment approved in April 2020 due to COVID-19.

**PLANNED NON-SIGNIFICANT CHANGES:**

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2017-1. THE MOVING ON PROGRAM

**PLAN YEAR APPROVED:** 2017

**RE-PROPOSED:** N/A

#### DESCRIPTION

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.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2016-3. PERMANENT INDOOR HOMELESS SHELTER BEDS

**PLAN YEAR APPROVED:** 2016

**RE-PROPOSED:** N/A

#### DESCRIPTION

In FY 2016, SDHC received approval under Broader Uses of Funds Authority, to subsidize shelter beds 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.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2016-2. THE GUARDIAN SCHOLARS PROGRAM

**PLAN YEAR:** 2016

**RE-PROPOSED:** N/A

#### DESCRIPTION

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

**PLANNED NON-SIGNIFICANT CHANGES:** A modified alternate HQS policy will be used for the units funded through the program.

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

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2016-1. THE MONARCH SCHOOL PROJECT

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

#### DESCRIPTION

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

#### Prior Updates

- FY 2020: Activity was re-proposed, broadens the initiative to allow for permanent supporting housing as required.
- FY 2018: Activity now utilizes the Coordinated Entry System (CES) for programmatic referrals.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

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

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

#### DESCRIPTION

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2014-2. LOCAL INCOME INCLUSION

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

#### DESCRIPTION

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2013-6. TRANSITIONAL PROJECT-BASED SUBSIDIES FOR THE HOMELESS

**PLAN YEAR:** 2013  
**RE-PROPOSED:** N/A

#### DESCRIPTION

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.

#### Prior Updates

- FY 2020: A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2017: The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2016: Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. The maximum subsidy is \$700 per bed. The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2015: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2013-4. PUBLIC HOUSING: FLAT RENT ELIMINATION

PLAN YEAR: 2013  
RE-PROPOSED: N/A

#### DESCRIPTION

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.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

### 2013-2. FAMILY SELF-SUFFICIENCY REINVENTION

PLAN YEAR: 2013  
RE-PROPOSED: 2015

#### DESCRIPTION

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.

#### Prior Updates

- FY 2015: Activity was re-proposed to allow an adult household member to enroll in the program as the sole participant
- FY 2014: The FSS Action Plan detailing the flat escrow deposit feature of the program is pending submission to HUD for approval. The flat escrow deposit schedule containing the outcomes and the corresponding deposit amounts will be further described in the Fiscal Year 2013 MTW Annual Report.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

### 2013-1. MTW VASH PROGRAM

PLAN YEAR: 2013  
RE-PROPOSED: N/A

#### DESCRIPTION

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

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

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

PLAN YEAR: 2012  
RE-PROPOSED: N/A

#### DESCRIPTION

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

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



## IMPLEMENTED ACTIVITIES

### 2012-2. BIENNIAL REEXAMINATION SCHEDULE

**PLAN YEAR:** 2012  
**RE-PROPOSED:** N/A

#### DESCRIPTION

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

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2012-1. PATH TO SUCCESS

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

#### DESCRIPTION

A comprehensive rent reform model utilizing a tiered rent structure with progressive increases to minimum rents. The model eliminates deductions and streamlines allowances. Path to Success only applies to families considered Work-Able. Families defined as Elderly/Disabled receive streamlining measures and are not subject to Path to Success.

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

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

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

#### DESCRIPTION

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

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

**2011-7.****DEVELOPMENT OF  
PUBLIC HOUSING  
UNITS USING A  
COMBINATION OF  
FUNDS****PLAN YEAR: 2011****RE-PROPOSED: N/A****DESCRIPTION**

SDHC creates/preserves public housing, without a competitive process, using acquisition and rehabilitation as the method of development.

*Prior Updates*

- FY 2014: Waivers corrected in the Fiscal Year 2012 Report to include MTW Agreement Attachment C, Section B(1)(b)(ii), B(1)(b)(vii) and B(1)(b)(viii) containing waivers of Sections 8 and 9(g)(3) of the 1937 Act and 24 CFR 982 and 990. MTW Agreement Attachment C, Section C (13) containing waivers of 24 CFR 941.40.
- FY 2013: This initiative was combined with the Fiscal Year 2010 Public Housing Development activity.

**PLANNED NON-SIGNIFICANT CHANGES:** None**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None**PLANNED SIGNIFICANT CHANGES:** None**2011-6. MODIFY****EIV INCOME REVIEW  
SCHEDULE****PLAN YEAR: 2011****RE-PROPOSED: N/A****DESCRIPTION**

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.

**PLANNED NON-SIGNIFICANT CHANGES:** None**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None**PLANNED SIGNIFICANT CHANGES:** None**2011-4.****ACQUISITION OF  
ADDITIONAL  
AFFORDABLE UNITS****PLAN YEAR: 2011****RE-PROPOSED: 2014****DESCRIPTION**

Uses Broader Uses of Funds Authority to acquire affordable housing units in San Diego using MTW funds.

*Prior Updates*

- SDHC continues to explore viable opportunities to create affordable housing.
- FY 2020: SDHC is utilizing the initiative to develop accessory dwelling units (ADUs) per local ordinances to increase affordable housing options in the City of San Diego.
- FY 2014: Re-proposed to expand the methods of affordable housing development available to SDHC.
- FY 2012: Clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego.

**PLANNED NON-SIGNIFICANT CHANGES:** Any income that is generated from SDHC-owned properties developed through this initiative will be used for affordable housing purposes.

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



## IMPLEMENTED ACTIVITIES

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

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

#### DESCRIPTION

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

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

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

**PLAN YEAR: 2011**  
**RE-PROPOSED: N/A**

#### DESCRIPTION

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

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

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

**PLAN YEAR: 2011**  
**RE-PROPOSED: N/A**

#### DESCRIPTION

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None





## IMPLEMENTED ACTIVITIES

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

PLAN YEAR: 2010  
RE-PROPOSED: 2015

#### DESCRIPTION

SDHC allocates a greater percent of budget authority to project-based vouchers to serve 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.

#### Prior Updates

FY 2015: Re-proposed to adopt additional flexibilities to require residents to participate in supportive services as a condition of tenancy; allow project-specific waiting lists maintained by the owners or non-profit providers; approve exception payment standards exceeding 110 percent of the FMR without requiring HUD approval; and increase the number of designated PBV units in a contract after the first three years of the contract have elapsed.

#### PLANNED NON-SIGNIFICANT CHANGES:

In order for SDHC to more efficiently manage its growing Project Based Voucher (PBV) portfolio, we propose using MTW flexibility for 24 CFR 983.302 (2) that states "The owner must request an increase in the rent to owner at the annual anniversary of the HAP contract by written notice to the PHA." SDHC intends to optimize the biennial reexamination schedule to ensure an equitable distribution of reexaminations each month, thereby streamlining the process and reducing administrative burden.

SDHC is proposing to change the rent change period from HAP anniversary month to reexamination month. This will further streamline the process by allowing rent increases to be processed concurrently with the reexamination on the optimized reexamination effective date.

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

**PLANNED SIGNIFICANT CHANGES:** None

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

PLAN YEAR: 2010  
RE-PROPOSED: 2012

#### DESCRIPTION

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

#### Prior Updates

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

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

### 2010-6. SIMPLIFY INCOME AND ASSET VERIFICATION SYSTEMS TO REDUCE ADMINISTRATIVE BURDEN

**PLAN YEAR:** 2010  
**RE-PROPOSED:** 2016

#### DESCRIPTION

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.

#### Prior Updates

FY 2016: Re-proposed to eliminate assets from the verification and rent calculation process, gain the ability to deny program admission to applicants owning homes, and incorporate activity 2011-5 into the initiative.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2010-5. STANDARDIZE UTILITY ALLOWANCES BY UNIT SIZE

**PLAN YEAR:** 2010  
**RE-PROPOSED:** N/A

#### DESCRIPTION

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.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2010-4. CHOICE COMMUNITIES

**PLAN YEAR:** 2010  
**RE-PROPOSED:** 2012, 2018

#### DESCRIPTION

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:

1. Moving for Opportunity Program
2. Revolving Security Deposit Loan fund
3. Increase payment standards in low-poverty areas

#### Prior Updates

- FY 2018: Re-proposed to increase flexibility related to determining payment standards. Payment standards are informed by hypothetical SAFMRs published by HUD, the information available at the time of the analysis.
- FY 2016: A Fiscal Year 2015 activity increased the rent burden to 50 percent program wide. Thus, the component eliminating the 40 percent rent burden is eliminated.
- FY 2012: Re-proposed to adopt a policy allowing SDHC to calculate payment standards below 90% of the FMR in high-poverty areas.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None

### 2010-2. AUTHORIZE THE SDHC TO INSPECT AND DETERMINE RENT REASONABLENESS FOR SDHC OWNED PROPERTIES

**PLAN YEAR:** 2010  
**RE-PROPOSED:** N/A

#### DESCRIPTION

Utilizes a local procedure to conduct inspections and determine rent reasonableness for SDHC-owned properties are conducted by SDHC.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None



## IMPLEMENTED ACTIVITIES

**2010-1.**

**IMPLEMENT A**

**REVISED INSPECTION  
PROTOCOL**

**PLAN YEAR: 2010**

**RE-PROPOSED: N/A**

**DESCRIPTION**

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.

*Prior Updates*

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: 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.
- FY 2015: Modified the activity to remove the qualifying criteria and authorize placement of all MTW units onto a Biennial Inspection Cycle.
- FY 2014: Results for HQS inspections occurring before implementation of the activity may not be considered for purposes of placement on the biennial inspection cycle.

**PLANNED NON-SIGNIFICANT CHANGES:** None

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

**PLANNED SIGNIFICANT CHANGES:** None



## NOT YET IMPLEMENTED ACTIVITIES

**2014-4. HOUSING  
SUBSIDY PROGRAM  
FOR HOMELESS YOUTH**

PLAN YEAR APPROVED: 2014

RE-PROPOSED: N/A

**DESCRIPTION**

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.

**IMPLEMENTATION DATE TIMELINE:** SDHC may implement this program during FY 2021 in coordination with the state of California's Project Homekey in response to the COVID-19 emergency.

**STATUS UPDATE:** Due to the COVID-19 pandemic, the state of California is including \$550 million in its Housing and Community Development budget towards the hotels to housing program called Project Homekey in which funds need to be expended by year end. This budget also includes \$50 million from California's general fund to assist in the conversion of these hotels into housing. In addition, the City of San Diego Community Action Plan on Homelessness identifies the reduction of homeless youth as a long-term goal.

**DESCRIPTION OF NON-SIGNIFICANT CHANGES/MODIFICATIONS SINCE APPROVAL:** None

## ACTIVITIES ON HOLD

**2013-3. ELIMINATION  
OF 100% EXCLUDED  
INCOME FROM THE  
INCOME VERIFICATION  
PROCESS**

PLAN YEAR APPROVED: 2013

IMPLEMENT DATE: SEP 01, 2012

RE-PROPOSED: N/A

HOLD DATE: JUL 01, 2019

**DESCRIPTION**

Removes the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058.

**REASON PLACED ON HOLD**

Activity had originally been reactivated due to the expiration of PIH Notice 2013-03. A Final Rule FR 5743-F-03 was published, reactivating the streamlining measure.

**STATUS UPDATE:** None

**ANTICIPATED REACTIVATION TIMELINE:** SDHC anticipates closing out the activity in FY 2021.

**EXPLANATION OF NON-SIGNIFICANT CHANGES / MODIFICATIONS:** Not Applicable

**2010-8. ESTABLISH AN  
HCV HOMEOWNERSHIP  
PROGRAM**

PLAN YEAR APPROVED: 2010

IMPLEMENT DATE: OCT 01, 2009

RE-PROPOSED: N/A

HOLD DATE: JUL 01, 2014

**DESCRIPTION**

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.

**REASON PLACED ON HOLD**

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.

**STATUS UPDATE:** None

**ANTICIPATED REACTIVATION TIMELINE**

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.

**EXPLANATION OF NON-SIGNIFICANT CHANGES / MODIFICATIONS:** Not Applicable

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

### CLOSED OUT ACTIVITIES

<b>2014-1.</b> Transitional Subsidy Program for Homeless Veterans.....	26
<b>2013-9.</b> New Public Housing Transition .....	26
<b>2013-5.</b> Homeless Veteran Project-Based Subsidy Program .....	26
<b>2012-4.</b> Project-Based Subsidy Program for the Homeless .....	26
<b>2011-10.</b> Broader Uses of Funds for IDAs.....	26
<b>2011-9.</b> Enhance Family Self-Sufficiency Program .....	26
<b>2011-5.</b> Disregard Retirement Accounts .....	27
<b>2010-10.</b> Undertake Public Housing Development.....	27
<b>2010-3.</b> Triennial Reexaminations for Elderly and Disabled Households .....	27
<b>2009-1.</b> Achievement Academy of the San Diego Housing Commission.....	27



## CLOSED OUT ACTIVITIES

<b>2014-1. TRANSITIONAL SUBSIDY PROGRAM FOR HOMELESS VETERANS</b>	<b>PLAN YEAR APPROVED:</b> 2014	<b>IMPLEMENTATION DATE:</b> JAN 01, 2014
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> OCT 01, 2014
	<b>DESCRIPTION</b> Using Broader Uses of Funds Authority, SDHC partners with Veteran's Village of San Diego (VVSD) to craft a transitional housing program using flat subsidies paired with supportive services. SDHC provides the housing subsidy while VVSD provides the supportive services.	
	<b>REASON(S) CLOSED OUT</b> Veteran's Village of San Diego, the intended partnering agency for the program, indicated a preference to pursue an alternative rental subsidy program.	
<b>2013-9. NEW PUBLIC HOUSING TRANSITION</b>	<b>PLAN YEAR APPROVED:</b> 2013	<b>IMPLEMENTATION DATE:</b> N/A
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> SEP 30, 2013
	<b>DESCRIPTION</b> Families transitioning out of a state-aided rental assistance program (25% TTP) to the public housing program (30% TTP) receive a transition period during which the families pay more than 25 percent but less than 30 percent of adjusted household income toward the rent portion before moving to 30 percent at the end of the transition period.	
	<b>REASON(S) CLOSED OUT</b> The flexibility requested under this initiative will not be required.	
<b>2013-5. HOMELESS VETERAN PROJECT-BASED SUBSIDY PROGRAM</b>	<b>PLAN YEAR APPROVED:</b> 2013	<b>IMPLEMENTATION DATE:</b> N/A
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> SEP 30, 2013
	<b>DESCRIPTION</b> Creates a local, non-traditional project-based subsidy pilot program to provide housing to veterans who are either not yet ready to enter a more regulated program or who temporarily exit a program. SDHC partners with Veteran's Village of San Diego for this activity.	
	<b>REASON(S) CLOSED OUT</b> Veteran's Village of San Diego determined the activity as neither economically advantageous nor viable under current circumstances and requested permission to close out the activity.	
<b>2012-4. PROJECT-BASED SUBSIDY PROGRAM FOR THE HOMELESS</b>	<b>PLAN YEAR APPROVED:</b> 2012	<b>IMPLEMENTATION DATE:</b> N/A
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> DEC 31, 2014
	<b>DESCRIPTION</b> Using Broader Uses of Funds Authority, SDHC created a program which provides a flat subsidy based on the number of authorized units in the development; all program administration is performed by the development owner with monitoring and auditing performed by SDHC.	
	<b>REASON(S) CLOSED OUT</b> SDHC determined the program structure as not advantageous to the agency's approach to ending homelessness on the City of San Diego. Efforts are focused in other development capacities.	
<b>2011-10. BROADER USES OF FUNDS FOR IDAS</b>	<b>PLAN YEAR APPROVED:</b> 2011	<b>IMPLEMENTATION DATE:</b> JUL 01, 2010
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUN 30, 2011
	<b>DESCRIPTION</b> SDHC received permission to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.	
	<b>REASON(S) CLOSED OUT</b> The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority, but rather single-fund flexibility. The activity is no longer active.	
<b>2011-9. ENHANCE FAMILY SELF-SUFFICIENCY PROGRAM</b>	<b>PLAN YEAR:</b> 2011	<b>IMPLEMENTATION DATE:</b> OCT 01, 2010
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUL 01, 2014
	<b>DESCRIPTION</b> In the event the head of household is unable to enroll in the FSS program (such as due to a disability), an adult household member may enroll in the program as the sole participant.	
	<b>REASON(S) CLOSED OUT</b> Per HUD's recommendation, the initiative will be combined with the FSS Reinvention activity via a re-proposal in the Fiscal Year 2015 MTW Annual Plan.	



## CLOSED OUT ACTIVITIES

<b>2011-5. DISREGARD RETIREMENT ACCOUNTS</b>	<b>PLAN YEAR:</b> 2011	<b>IMPLEMENTATION DATE:</b> AUG 01, 2010
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUN 30, 2015
	<b>DESCRIPTION</b> SDHC disregards retirement accounts when verifying an applicant or participant's assets.	
	<b>REASON(S) CLOSED OUT</b> The re-proposal of activity 2010-6 wherein assets are eliminated from the rent calculation eliminates the need for the activity.	
<b>2010-10. UNDERTAKE PUBLIC HOUSING DEVELOPMENT</b>	<b>PLAN YEAR:</b> 2010	<b>IMPLEMENTATION DATE:</b> JUL 01, 2010
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUN 30, 2011
	<b>DESCRIPTION/UPDATE</b> Acquire, rehabilitate, or produce housing units as public housing.	
	<b>REASON(S) CLOSED OUT</b> This activity was closed out in the Fiscal Year 2011 MTW Report. Public Housing development will occur under the Fiscal Year 2011 Public Housing Development initiative which combines the authorizations and flexibilities.	
<b>2010-3. TRIENNIAL REEXAMINATIONS FOR ELDERLY AND DISABLED HOUSEHOLDS</b>	<b>PLAN YEAR:</b> 2010	<b>IMPLEMENTATION DATE:</b> OCT 01, 2009
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUL 01, 2015
	<b>DESCRIPTION/UPDATE</b> Allows families defined as Elderly/Disabled to participate in a Triennial Reexamination Cycle. COLA updates to social security and veteran's benefits are processed in the "off" years. The activity was implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.	
	<b>REASON(S) CLOSED OUT</b> SDHC closed out the activity to streamline the reexamination process for Path to Success participants and rental assistance staff. Multiple reexamination processes for households proved difficult to administer when population changes occurred between Work-Able and Elderly/Disabled households. Path to Success households are placed on a biennial reexamination process effective with July 2015 reexamination. The PBV and FUP programs remain on an annual reexamination cycle.	
<b>2009-1. ACHIEVEMENT ACADEMY OF THE SAN DIEGO HOUSING COMMISSION</b>	<b>PLAN YEAR:</b> 2009	<b>IMPLEMENTATION DATE:</b> OCT 01, 2010
	<b>RE-PROPOSED:</b> N/A	<b>DATE CLOSED OUT:</b> JUN 30, 2011
	<b>DESCRIPTION/UPDATE</b> The SDHC Achievement Academy, formerly known as the Economic Development Academy, offers a broad range of one-on-one services and workshops geared toward workforce preparation, financial literacy, and homeownership education.	
	<b>REASON(S) CLOSED OUT</b> The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority. The activity is ongoing but reported as a single fund flexibility activity in Section 5 of the Plan	



## SECTION V – SOURCES AND USES OF MTW FUNDS

### ESTIMATED SOURCES AND USES OF MTW FUNDS

#### I. ESTIMATED SOURCES OF MTW FUNDS

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

SOURCES		
FDS LINE ITEM	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	TOTAL TENANT REVENUE	\$0
70600	HUD PHA OPERATING GRANTS	\$188,212,036
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	\$3,653,004
70000	TOTAL REVENUE	\$191,865,040

#### II. ESTIMATED USES OF MTW FUNDS

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

SOURCES		
FDS LINE ITEM	FDS LINE ITEM	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	TOTAL OPERATING - ADMINISTRATIVE	\$10,495,323
91300+91310+92000	MANAGEMENT FEE EXPENSE	\$0
91810	ALLOCATED OVERHEAD	\$9,100,160
92500 (92100+92200+92300+92400)	TOTAL TENANT SERVICES	\$1,709,793
93000 (93100+93600+93200+93300+93400+93800)	TOTAL UTILITIES	\$0
93500+93700	LABOR	\$0
94000 (94100+94200+94300+94500)	TOTAL ORDINARY MAINTENANCE	\$0
95000 (95100+95200+95300+95500)	TOTAL PROTECTIVE SERVICES	\$0
96100 (96110+96120+96130+96140)	TOTAL INSURANCE PREMIUMS	\$227,609
96000 (96200+96210+96300+96400+96500+96600+96800)	TOTAL OTHER GENERAL EXPENSES	\$601,727
96700 (96710+96720+96730)	TOTAL INTEREST EXPENSE AND AMORTIZATION COST	\$0
97100+97200	TOTAL EXTRAORDINARY MAINTENANCE	\$0
97300+97350	HOUSING ASSISTANCE PAYMENTS + HAP PORTABILITY-IN	\$169,730,428
97400	DEPRECIATION EXPENSE	\$0
97500+97600+97700+97800	ALL OTHER EXPENSES	\$0
90000	TOTAL EXPENSES	\$191,865,040

*\*Budget numbers will be updated incorporating final Federal budget number and approval from governing boards*

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

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

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





### SINGLE FUND FLEXIBILITY NARRATIVE

In Fiscal Year 2021, SDHC remains committed to preserving and expanding affordable housing in the City of San Diego. During Fiscal Year 2020, SDHC commissioned a report titled, “Preserving Affordable Housing in the City of San Diego.” Preserving existing affordable rental housing is an essential element of a balanced approach that combines preservation and new construction to address the affordable housing and homelessness challenges.

In order to develop a strategy to enhance preservation and to have a clearer understanding of the existing housing inventory, a comprehensive database of deed-restricted affordable rental housing units citywide was created. The preservation study analyzed the data, identified the City of San Diego’s housing preservation needs, estimated costs for addressing the challenges, and recommended a framework with strategies for policymakers to consider to achieve the necessary affordable housing preservation objectives.

In Fiscal Year 2021, SDHC plans to commit MTW funds towards a preservation strategy based on best practices detailed in the report in conjunction with the proposed MTW Preservation activity. SDHC also anticipates using MTW funds for development of new affordable housing units and rehabilitation activities on SDHC-owned properties.

### ENVISION CENTER

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

To provide flexibility, one location is housed in Southeast San Diego, bordering the Promise Zone. The other location is housed at the SDHC’s Achievement Academy. EnVision Centers are open to any households currently receiving SDHC’s rental assistance and also those on the waitlist. Other clients served include residents of the Promise Zone.

EnVision Centers 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 within 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. 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 support self-sufficiency. The resources offered at the Achievement Academy are a vital component of the Path to Success rent reform activity as participants are incentivized to increase income and work towards self-sufficiency. SDHC plans to continue and grow these partnerships to better serve our families and increase economic self-reliance. The following describes some of the 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 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 recruitments, participants may receive assistance in the Academy's computer lab to submit on-line applications.

### YOUTH PROGRAMS

Staff at the Achievement Academy work to offer innovative programming in an effort to keep participants interested and engaged. The Academy offers 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. In the past, IRC has been able to offer intern placements to develop employment history. This 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.

### 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

Two WRS positions have been certified as Financial Counselors. The Financial Counselors 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

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

The chart below contains a summary of the results of Achievement Academy activities at the close of Fiscal Year 2019.

ACHIEVEMENT ACADEMY			
METRIC	BASELINE	OUTCOME	BENCHMARK ACHIEVED?
Number of rental assistance participants receiving core services	982	1,197	Yes
Number of rental assistance participants with an increase in earnings	229	414	Yes
Number of rental assistance participants placed in employment	144	328	Yes
Number of rental assistance participants employed for 12 or more consecutive months	44	52	Yes
Number of rental assistance participants who attended a work readiness workshop	727	1,279	Yes
Percent of rental assistance participants who attended a recruitment and resource fair and obtained employment as a direct result	0%	25%	Yes
Number of rental assistance participants who completed vocational or bridge training	0	42	Yes

## LOCAL ASSET MANAGEMENT PLAN

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

Yes

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

No

Did the MTW PHA provide a LAMP in the appendix?

No



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

SDHC did not operate a Local Asset Management Plan during Fiscal Year 2020.

### RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

#### DESCRIPTION OF RAD PARTICIPATION

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

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

N/A

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

N/A

If the MTW PHA has provided RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A



## SECTION VI – ADMINISTRATIVE

### A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

See Appendix A

### B. DOCUMENTATION AND PUBLIC PROCESS

See Appendix B

### C. PLANNED OR ONGOING EVALUATIONS

There are no planned or ongoing evaluations

### D. LOBBYING DISCLOSURES

See Appendix C



## APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

### BOARD RESOLUTION

PAGE 1 OF 3

#### SAN DIEGO HOUSING COMMISSION

#### RESOLUTION NO. 1853

ADOPTED ON February 7, 2020

A RESOLUTION APPROVING THE SAN DIEGO HOUSING COMMISSION'S FISCAL YEAR 2021 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 2021 Moving to Work Annual Plan, described more particularly in Housing Commission Report No. HCR20-018 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 January 10, 2020, the Housing Commission Board held an informational public workshop on the proposed Fiscal Year 2021 Moving to Work Annual Plan; and

-PAGE 1 OF 3-



BOARD RESOLUTION

PAGE 2 OF 3

WHEREAS, on February 7, 2020, consistent with the 2012 HA Resolution, the Housing Commission Board approved the proposed Fiscal Year 2021 Moving to Work Annual Plan and related actions; and

WHEREAS, pursuant to San Diego Municipal Code Section 98.0301, paragraph (e), the Housing Authority of the City of San Diego retains the right to modify, reverse, or change the Fiscal Year 2021 Moving to Work Annual Plan and related actions by referring the action to the Housing Authority of the City of San Diego for final action within seven days after the date of Housing Commission Action, and has done so in the past; and

WHEREAS, the Housing Authority of the City of San Diego did not elect to refer the Fiscal Year 2021 Moving to Work Annual Plan and related actions in accordance with San Diego Municipal Code Section 98.0301, paragraph (e)(2); and

WHEREAS, the Housing Commission Board approval of the proposed Fiscal Year 2021 Moving to Work Annual Plan and related actions is now final.

NOW, THEREFORE,

BE IT RESOLVED by the Housing Commission Board as follows:

1. The Housing Commission's Fiscal Year 2021 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



BOARD RESOLUTION


PAGE 3 OF 3

take such actions as are necessary and/or appropriate to implement these approvals.

Approved as to Form:

Christensen & Spath

By:

  
Walter E. Spath III, General Counsel  
San Diego Housing Commission

-PAGE 3 OF 3-





## CERTIFICATIONS OF COMPLIANCE

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 (07/01/2020), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender 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

CA 063

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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

Richard C. Gentry

Chief Executive Officer

NAME OF AUTHORIZED OFFICIAL

TITLE

*Richard C. Gentry*

6/30/2020

SIGNATURE

DATE

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



## APPENDIX B: DOCUMENTATION AND PUBLIC PROCESS

### PUBLIC NOTICE: SAN DIEGO UNION-TRIBUNE

PUBLISHED DECEMBER 16<sup>TH</sup> AND DECEMBER 23<sup>RD</sup>, 2019

AY • DECEMBER 16, 2019

#### **PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION MOVING TO WORK FISCAL YEAR 2021 PLAN**

The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2021 (July 1, 2020 – June 30, 2021) Annual Plan. The proposed plan will be available for review on SDHC's website, [www.sdhc.org](http://www.sdhc.org), beginning on January 6, 2020. Comments must be submitted by 5 p.m. on February 7, 2020, 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: Mariangela Patruno/Moving Forward, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to [mariangelap@sdhc.org](mailto:mariangelap@sdhc.org)

#### **SUBJECT**

In its MTW Annual Plan for Fiscal Year 2021 (July 1, 2020 – June 30, 2021), SDHC describes activities intended to increase programmatic efficiencies, support self-sufficiency for rental assistance participants, and expand housing choice options for low-income families in the City of San Diego. The plan also proposes to implement an alternative formula to determine Total Development Cost limits, and an activity to provide preservation assistance to programs and developments.

SDHC is soliciting public comment on planned programmatic activities for Fiscal Year 2021.

#### **PUBLIC HEARING**

SDHC will hold a public hearing on the proposed Fiscal Year 2021 MTW Annual Plan on Tuesday, January 21, 2020, at 9 a.m. at the SDHC Achievement Academy, 1045 11th Avenue, San Diego, CA 92101.



## PUBLIC NOTICE: VOICE AND VIEWPOINT

## LEGAL NOTICES

Dates of Public Notice:  
December 16, 2019 and  
December 23, 2019  
**PUBLIC NOTICE OF THE  
SAN DIEGO HOUSING  
COMMISSION  
MOVING TO WORK  
FISCAL YEAR 2021 PLAN**

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## PUBLIC NOTICE: EL LATINO

**Dates of Public Notice: December 16, 2019 and December 23, 2019**  
**PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION**  
**MOVING TO WORK FISCAL YEAR 2021 PLAN**

**PUBLIC NOTICE**

The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2021 (July 1, 2020 – June 30, 2021) Annual Plan. The proposed plan will be available for review on SDHC's website, [www.sdhc.org](http://www.sdhc.org), beginning on January 6, 2020. Comments must be submitted by 5 p.m. on February 7, 2020, 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: Mariangela Patruno/Moving Forward, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to [mariangelap@sdhc.org](mailto:mariangelap@sdhc.org)

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PUBLIC COMMENT MATRIX

No comments were received at the public hearing or during the public comment period.

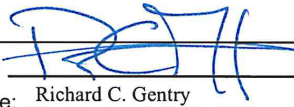
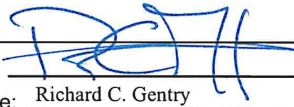


## APPENDIX C: LOBBYING DISCLOSURES

## 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> \$ 196,418,223		
<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: 10/24/2019		
<b>Federal Use Only:</b>				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	





## APPENDIX D: NON-MTW RELATED SDHC INFORMATION

### \$30.1 MILLION INVESTMENT TO CREATE AFFORDABLE HOUSING

On September 23, 2019, SDHC released a Notice of Funding Availability (NOFA) of up to \$30.1 million for the creation and preservation of affordable rental housing, including units to address homelessness:

- Up to \$13 million to create affordable rental housing with supportive services for San Diegans experiencing homelessness, also known as permanent supportive housing
- Up to \$5 million to acquire and rehabilitate permanent supportive housing
- Up to \$12.1 million to create affordable rental housing for low-income San Diegans

The NOFA also includes up to 400 federal rental housing vouchers committed by SDHC—300 for households experiencing homelessness and 100 for households with low-income.

This NOFA supports HOUSING FIRST - SAN DIEGO, SDHC's homelessness action plan.

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

On October 14, 2019, the San Diego City Council unanimously approved the City of San Diego Community Action Plan on Homelessness.

Through a contract with SDHC on behalf of the City, the Corporation for Supportive Housing (CSH), a nationally recognized consultant with broad expertise in the area of homelessness, developed this Community Action Plan.

The initial development of this plan included the creation of a Steering Committee that consisted of key staff members from major funding and policy-making agencies in the City of San Diego. The Steering Committee included Keely Halsey, Chief of Homelessness Strategies & Housing Liaison for the Office of Mayor Kevin L. Faulconer; Molly Chase, Chief of Staff for San Diego City Councilmember Chris Ward; Tamera Kohler, Chief Executive Officer of the Regional Task Force on the Homeless (RTFH); and Lisa Jones, Senior Vice President of Homeless Housing Innovations for SDHC. The Steering Committee supported the work of CSH through all phases of the plan development.

The participation and input of more than 200 members of the community, including individuals who have experienced homelessness and those who regularly work directly with individuals experiencing homelessness, contributed to the development of the goals, principles, recommendations and strategies in this Community Action Plan.

#### VISION

By working creatively and collaboratively, the City of San Diego will build a client-centered homeless assistance system that aims to prevent homelessness, and that quickly creates a path to safe and affordable housing and services for people who experience homelessness in our community.

#### GOALS WITHIN REACH

In three years:

- Decrease unsheltered homelessness by 50 percent
- Finish the job of ending veteran homelessness
- Prevent and end youth homelessness as outlined in the San Diego County Coordinated Community Plan to End Youth Homelessness

#### GUIDING PRINCIPLES

System partners must rely on a set of principles to guide policy and funding decisions and build community cohesion.

- Be accountable
- Develop creative and new housing options
- Value the voices of people with lived experience
- Improve service and options to people experiencing homelessness through evidence-based approaches



- Make data-driven decisions and create transparency
- Communicate and collaborate more effectively and frequently
- Build capacity
- Create positive momentum
- Remove politics from decision-making about homelessness

### RECOMMENDED ACTIONS

- **Advance high impact solutions.** Developing long-term housing takes time. Aggressive measures must be taken now, and the system needs to be flexible over time to meet changing needs and circumstances.
- **Support strong leadership.** Creation of a city-wide leadership council and project manager to keep progress on track.
- **Invest in new housing and service options.** Increase temporary crisis response solutions while also investing in permanent long-term units.
- **Quickly address key issues.** Address items needing immediate attention including adding behavioral health resources, outreach coordination, utilization of vouchers and appropriately staff entities implementing this plan.

### KEY STRATEGIES

1. **Implement a systems-level approach to homelessness planning.** Build capacity and infrastructure around city-level governance, strategic thinking and systems change to support the articulated goals.
2. **Create a client-centered homeless assistance system.** Create a homeless assistance system that centers on clients and values client feedback in system design and resource allocation.
3. **Decrease inflow through increase of prevention and diversion.** Work with other regional systems to prevent homelessness when possible and divert people from the system altogether.
4. **Improve the performance of the existing system.** Review current practices, performance and metrics to move from project-level thinking to system-level thinking.
5. **Increase the production of/access to permanent solutions.** Identify low-income and affordable housing options to increase opportunities to provide greater access to permanent housing.

### PERMANENT HOUSING NEEDS

- 5,416 permanent housing opportunities needed over the next 10 years for individuals and families experiencing homelessness:
  - New or rehabilitated supportive housing
  - Supportive housing leased in the private rental market
  - Rapid rehousing rental assistance with services for one year
  - Low-income housing rental assistance with services for three years
  - Homelessness diversion assistance
- Estimated cost: \$1.9 billion over 10 years
- Potential funding sources could include:
  - City bond measures to create funding for homelessness services and new supportive housing
  - State homeless assistance funding
  - Federal HOME Investment Partnerships Program funds, Section 8 Housing Choice Voucher rental assistance dedicated to addressing homelessness, and public housing units
  - Resources for services, including coordination with the County of San Diego
  - City funds, such as Affordable Housing Fund, City General Fund, or Special fees
  - Private philanthropy



### CRISIS RESPONSE ACTIONS

- 350-500 new crisis response beds or services needed to meet the needs of individuals and families experiencing homelessness and the estimated annual inflow into emergency shelters.
- Estimated cost: Approximately \$2.2 million per 100 new beds in annual operating costs
  - Potential additional capital costs if new Sprung structures are needed for shelters.
- The plan includes five actions for meeting the crisis response need for single individuals and three actions for meeting the need for families.

### FOURTH CITY OF SAN DIEGO BRIDGE SHELTER

SDHC administers the City of San Diego's Bridge Shelter Programs, which provide temporary shelter and services to individuals and families experiencing homelessness in the City of San Diego while they work with staff to identify an appropriate housing solution.

On October 15, 2019, the San Diego City Council, in its role as the Housing Authority of the City of San Diego, approved the operation of a fourth Bridge Shelter.

This new shelter provides approximately 130 additional beds for individuals experiencing homelessness in the City of San Diego. These additional beds partially fulfill the crisis response actions identified in the City's Community Action Plan on Homelessness.

The population this shelter serves will be flexible, and the shelter may serve more than one sub-population at a time.

The City's previous three Bridge Shelters serve families with children and single women (141 beds), singled adults (324 beds) and veterans (200 beds) experiencing homelessness.

Between December 2, 2017, and June 30, 2019, these three Bridge Shelters served 4,346 individuals, 899 of whom exited to permanent or longer-term housing.

### MIDDLE INCOME PILOT

Assembly Bill (AB) 1637, known as the "Missing Middle Housing Act," grew out of the San Diego Housing Commission's (SDHC) development of a comprehensive blueprint to identify the costs of developing affordable housing and make recommendations on how to lower those costs. On November 25, 2015, SDHC published "Addressing the Housing Affordability Crisis: An Action Plan for San Diego." The report included 11 recommended actions at the local, state, and federal levels. AB 1637 was drafted in response to one of those 11 recommendations, which was to encourage mixed-income developments.

In addition, an SDHC follow-up report, "Addressing the Housing Affordability Crisis: San Diego Housing Production Objectives 2018-2028," published on September 21, 2017, identified the lack of supply as a major contributor to the City of San Diego's housing affordability crisis. This report found that the City needs to produce 150,000 to 220,000 housing units across all income levels by 2028.

Specifically, the report also indicated that middle-income families, those earning 80-150 percent of the Area Median Income (AMI), are also impacted by the region's housing affordability crisis. Although this group has not typically been a focus of affordable housing policies (oftentimes referred to as "the missing middle" as a result), more than 70 percent of this population cannot afford home ownership, and more than 30 percent cannot afford rent, according to the report.

In order to address these needs, SDHC and the City of San Diego worked with Assemblymember Todd Gloria (78th District) on AB 1637. On October 14, 2017, then-Governor Edmund G. "Jerry" Brown Jr. signed AB 1637 into law, allowing public housing authorities in the City of San Diego and the County of Santa Clara to make loans to finance the construction of multifamily housing developments that include units affordable to both low- and middle-income households.



AB 1637 requires eligible housing developments to have at least 40 percent of the units affordable to and occupied by low-income households and at least 10 percent of the units affordable to and occupied by middle-income households. SDHC's 2019 Income Calculations, which are derived from income limits provided by the U.S. Department of Housing and Urban Development (HUD), are:

- 80 Percent AMI (Low-Income): \$85,600 Income; and
- 150 Percent AMI (Middle-Income): \$129,450 Income.

Under AB 1637, the public housing authorities of the City of San Diego and the County of Santa Clara may provide gap financing for mixed-income housing developments in the form of loans to fund the remaining cost of development of the middle-income units after other funds have been secured, including but not limited to bond funds, tax credits, conventional loans, or other private and public funds. Gap financing may not be used to produce units at or above market-rate rents. All gap financing loans must first be approved by the public housing authority's legislative body by resolution after a public hearing.

This affordability range has not previously been served by public housing authorities. However, it is essential to the ability to provide a continuum of housing opportunities for those moving from low-income to market-rate housing. The expanded affordability levels also create the opportunity to attract new revenue sources for affordable housing development, and incentivize the production of mixed-income rental housing developments, which support the City of San Diego's balanced-community objectives.

SDHC is currently in the process of investigating the acquisition and rehabilitation of an existing apartment complex, that would involve the assumption of existing conventional financing, which would qualify as "gap financing" under the terms of the program, where not less than 40 percent of the units will be affordable to households at or below 80 percent of AMI, with a large percentage of the balance being affordable to households at or below 150 percent of AMI. Depending upon due diligence, this project could be financed in part by the assumption of existing conventional financing, use of local revenues, and other funds that are ordinarily used to finance low-income housing development. The effect of assuming the conventional loan will provide gap financing that will allow for the creation of units affordable at or below 150 percent of AMI, which would not be possible without the provisions of AB 1637. Provided the due diligence does not reveal any factors that would make the acquisition and rehabilitation of the units infeasible, the acquisition would occur in the calendar year 2020.



## APPENDIX E: SUPPORTING DOCUMENTATION FOR PROPOSED ACTIVITIES

### SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

Project References								
PROPERTY NAME	BUILDING	TYPE	HCC (\$)	TDC (\$)	Gross SF	\$/SF HCC	\$/SF TDC	BOARD REPORT
Elevator								
ALPHA LOFTS	ELEVATOR	NEW	\$ 10,020,106	\$ 16,689,662	38,566	\$ 259.82	\$ 432.76	HCR17-010
STELLA	ELEVATOR	NEW	\$ 17,862,896	\$ 25,954,448	59,003	\$ 302.75	\$ 439.88	HCR17-093
ZEPHYR GRANTVILLE VETERANS APARTMENTS	ELEVATOR	REHAB	\$ 9,159,000	\$ 25,665,500	50,960	\$ 179.73	\$ 503.64	HCR17-014
ENCANTO VILLAGE	ELEVATOR	NEW	\$ 14,138,561	\$ 21,888,404	65,400	\$ 216.19	\$ 334.69	HCR17-020
PARK & MARKET	ELEVATOR	NEW	\$ 174,551,726	\$ 225,494,043	471,444	\$ 370.25	\$ 478.31	HCR17-039
THE BEACON	ELEVATOR	NEW	\$ 10,142,953	\$ 16,735,881	26,166	\$ 387.64	\$ 639.60	HCR17-050
CIVITA II FAMILY	ELEVATOR	NEW	\$ 72,257,767	\$ 99,339,048	185,390	\$ 389.76	\$ 535.84	HAR17-036
LUTHER TOWER	ELEVATOR	REHAB	\$ 11,032,169	\$ 26,172,310	98,000	\$ 112.57	\$ 267.06	HCR17-078
BLUEWATER	ELEVATOR	NEW	\$ 19,870,000	\$ 28,809,500	90,944	\$ 218.49	\$ 316.78	HCR17-083
SAN YSIDRO SENIOR VILLAGE	ELEVATOR	NEW	\$ 8,359,403	\$ 15,399,132	29,610	\$ 282.32	\$ 520.07	HCR18-018
WEST PARK	ELEVATOR	REHAB	\$ 5,009,730	\$ 13,652,049	12,652	\$ 395.96	\$ 1,079.04	HCR19-003
JAMBOREE	ELEVATOR	NEW	\$ 16,875,089	\$ 30,030,347	66,947	\$ 252.07	\$ 448.57	HCR19-007
TRINITY APARTMENTS	ELEVATOR	NEW	\$ 18,035,060	\$ 29,003,070	43,978	\$ 410.09	\$ 659.49	HCR19-019
SCRIPPS MESA	ELEVATOR	NEW	\$ 79,000,000	\$ 106,840,000	374,261	\$ 211.08	\$ 285.47	HCR19-050
QUALITY INN	ELEVATOR	REHAB	\$ 8,263,233	\$ 11,029,876	23,612	\$ 349.96	\$ 467.13	HCR19-053
EAST BLOCK FAMILY	ELEVATOR	NEW	\$ 28,062,466	\$ 36,131,299	103,708	\$ 270.59	\$ 348.39	HCR19-099
EAST BLOCK SENIORS	ELEVATOR	NEW	\$ 23,160,884	\$ 26,992,957	81,942	\$ 282.65	\$ 329.42	HCR19-056
WESLEY TERRACE	ELEVATOR	REHAB	\$ 13,853,827	\$ 29,254,990	110,000	\$ 125.94	\$ 265.95	HCR19-057
ULRIC STREET	ELEVATOR	NEW	\$ 26,037,629	\$ 41,293,511	98,643	\$ 263.96	\$ 418.62	HCR19-070
COURTHOUSE COMMONS	ELEVATOR	NEW	\$ 178,800,000	\$ 234,670,000	524,917	\$ 340.63	\$ 447.06	HCR19-077
14TH AND COMMERCIAL APARTMENTS	ELEVATOR	NEW	\$ 87,912,636	\$ 134,853,907	237,174	\$ 370.67	\$ 568.59	HCR19-087
14C VHHP	ELEVATOR	NEW	\$ 23,380,949	\$ 35,434,998	53,481	\$ 437.18	\$ 662.57	HCR19-088
KEELER COURT	ELEVATOR	NEW	\$ 20,650,582	\$ 36,170,233	78,939	\$ 261.60	\$ 458.20	HCR19-089
Walkup								
BELLA VISTA	WALKUP	REHAB	\$ 8,770,116	\$ 39,768,420	137,756	\$ 63.66	\$ 288.69	HCR17-017
NEW PALACE HOTEL	WALKUP	REHAB	\$ 7,943,045	\$ 19,040,849	34,563	\$ 229.81	\$ 550.90	HCR17-018
TOWN & COUNTRY APARTMENTS	WALKUP	REHAB	\$ 13,286,361	\$ 43,074,044	147,785	\$ 89.90	\$ 291.46	HAR17-019
VISTA DEL PUENTE	WALKUP	NEW	\$ 13,522,258	\$ 19,677,147	47,794	\$ 282.93	\$ 411.71	HCR17-031
SAN YSIDRO FAMILY APARTMENTS	WALKUP	NEW	\$ 23,882,816	\$ 38,812,315	130,000	\$ 183.71	\$ 298.56	HAR17-034
REGENCY CENTRE APARTMENTS	WALKUP	REHAB	\$ 9,192,744	\$ 25,955,708	81,500	\$ 112.79	\$ 318.47	HAR17-038
CORONADO TERRACE	WALKUP	REHAB	\$ 25,548,297	\$ 111,579,303	301,428	\$ 84.76	\$ 370.17	HCR17-042
CASA PULETA	WALKUP	REHAB	\$ 1,746,932	\$ 9,391,159	63,226	\$ 27.63	\$ 148.53	HCR17-045
PACIFICA AT PLAYA DEL SOL	WALKUP	NEW	\$ 7,828,483	\$ 14,949,746	48,563	\$ 161.20	\$ 307.84	HCR17-089
HOLLYWOOD PALMS II	WALKUP	REHAB	\$ 8,435,601	\$ 27,990,851	93,413	\$ 90.30	\$ 299.65	HCR17-091
PARKSIDE APARTMENTS	WALKUP	REHAB	\$ 3,106,636	\$ 9,361,632	31,940	\$ 97.26	\$ 293.10	HCR18-052
HILLSIDE VIEWS APARTMENTS	WALKUP	REHAB	\$ 16,736,053	\$ 72,744,661	279,624	\$ 59.85	\$ 260.15	HCR18-083
HARBOR VIEW VILLA APARTMENTS	WALKUP	REHAB	\$ 3,103,340	\$ 12,171,847	58,340	\$ 53.19	\$ 208.64	HCR19-006
IVY APARTMENTS	WALKUP	NEW	\$ 8,309,583	\$ 17,333,831	33,512	\$ 247.96	\$ 517.24	HCR19-017
BENSON APARTMENTS	WALKUP	REHAB	\$ 8,576,357	\$ 22,551,411	26,050	\$ 329.23	\$ 865.70	HCR19-018
MISSION TERRACE APARTMENTS	WALKUP	REHAB	\$ 4,379,505	\$ 18,397,900	103,108	\$ 42.47	\$ 178.43	HCR19-064
MARINER'S VILLAGE	WALKUP	REHAB	\$ 15,013,020	\$ 68,516,724	171,896	\$ 87.34	\$ 398.59	HCR19-090
PARK CREST	WALKUP	REHAB	\$ 5,658,696	\$ 42,542,504	146,222	\$ 38.70	\$ 290.94	HCR19-101
GRANT HEIGHTS / WINONA APARTMENTS	WALKUP	REHAB	\$ 3,160,080	\$ 14,733,294	28,422	\$ 111.18	\$ 518.38	HCR19-103



### SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

AVERAGE TDC AND HCC		
	AVERAGE TDC PER SQ. Ft.	AVERAGE HCC PER SQ. Ft.
ELEVATOR	\$474.22	\$290.95
WALKUP	\$358.80	\$125.99

### WALKUP COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HUD	Walkup	81,058	141,852	110,721	193,761	140,175	245,306	184,728	323,274	228,994	400,739	258,078	451,637	286,822	501,938
SDHC	Walkup	62,997	179,399	88,196	251,159	113,395	322,918	151,194	430,557	214,191	538,197	214,191	609,956	239,390	681,716

### ELEVATOR COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HUD	Elevator	91,130	145,807	127,581	204,130	164,033	262,453	218,711	349,938	273,389	437,422	309,841	495,745	346,292	554,068
SDHC	Elevator	145,476	237,112	203,666	331,956	261,856	426,801	349,142	569,068	436,427	711,335	494,618	806,179	552,808	901,024

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

#### FY 2021 SAN DIEGO REASONABLE COST LIMITS (PROPOSED)

	0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
Detached/Semi-Detached	106,855	186,997	138,209	241,866	165,349	289,361	197,097	344,919	232,214	406,374	254,508	445,389	275,393	481,938
Row Homes	92,115	161,200	120,236	210,414	145,667	254,917	177,708	310,990	210,753	368,818	231,788	405,630	251,442	440,023
Walkup	62,977	179,399	88,196	251,159	113,395	322,918	151,194	430,557	188,992	538,197	214,191	609,956	239,390	681,716
Elevator	145,476	237,112	203,666	331,956	261,856	426,801	349,142	569,068	436,427	711,335	494,618	806,179	552,808	901,024



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

OFFICE OF PUBLIC AND INDIAN HOUSING

September 28, 2020

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

Re: San Diego Housing Commission FY 2021 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 2021, initially submitted on April 15, 2020, with revisions submitted on June 23, 2020, July 7, 2020, September 8, 2020, and September 24, 2020. I am writing to inform you that the Plan, as submitted on September 24, 2020, is approved.

Please note that all local, non-traditional (LNT) activities implemented under the MTW Demonstration program must meet the requirements of Notice PIH 2011-45. Specifically, any LNT housing development programs must pay Davis-Bacon wage rates and must also be under a legally binding commitment such as a use agreement, covenant, or other document acceptable to HUD.

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 Notice 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 Autumn Gold, MTW Coordinator, at [Autumn.J.Gold@hud.gov](mailto:Autumn.J.Gold@hud.gov) if you have any questions.

Sincerely,



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

cc: Jesse Wu, Los Angeles PIH Field Office