

2018

Moving to Work

ANNUAL PLAN

Housing Authority of the County of San Bernardino



*Building Communities
Changing Lives*

MTW DESIGNATED AGENCY



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OUR MISSION

HACSB empowers all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

OUR VISION

HACSB is committed to creating a world in which all people have a stable and enriched quality of life.

OUR CORE VALUES

RESPECT | We believe that all people should have a stable and enriched quality of life and should be afforded the opportunity to not only survive, but to thrive in environments that are sensitive to and encourage respect and empathy for individual circumstances.

SAFETY | We believe that all residents deserve a safe and secure living environment that is crime and distraction free and where families can feel good about raising their children.

INTEGRITY | We believe that there is a strong, mutually-reinforcing connection between the integrity of our staff/programs and the success of our clients. Integrity building within our organization is key toward fulfilling our mission statement.

SERVICE | We believe that in order to be successful we must serve the public by being effective stewards of its financial resources and by developing a customer service business model based on benchmarks and measurements.



Housing Authority of the County of San Bernardino **EXECUTIVE MANAGEMENT TEAM**



Maria Razo
Executive Director



Gustav Joslin
Deputy Executive Director



Jennifer Dawson
Director of Human Resources



Ana Gamiz
Director of Policy and Public Relations



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FOR MORE INFORMATION

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Section I: Introduction

For over 70 years, the Housing Authority of the County of San Bernardino (HACSB) has been one of the leading providers of affordable housing in the County of San Bernardino. The County of San Bernardino is the largest county in the contiguous United States consisting of 24 cities and covering over 20,000¹ square miles of land. It is the twelfth largest county in the nation², with more residents than 15 of the country's states. The population of San Bernardino County has grown by 4.6³ percent between 2010 and 2015 and is expected to rise by 27% between 2014 and 2035. HACSB proudly serves more than 30,000 people, most of whom are seniors, disabled individuals and children.

Our agency's success is a result of our business approach to strategic planning and delivery of services. We strive to design our program as a stepping stone, providing housing stability to our families on their path to economic independence. In alliance with an extensive list of community partners, government agencies, employment service providers, and institutions of higher education, we provide family/individual case management and counseling, assist with career training and job placement, and ensure program integrity. These efforts are building blocks to achieve our mission and vision while upholding our core values of respect, safety, integrity and service.

HACSB Mission Statement - Empower all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

HACSB Vision – HACSB is committed to creating a world in which all people have a stable and enriched quality of life.

HACSB Values - HACSB strives to be a key participant in supporting and improving the community it serves. HACSB seeks to streamline its programs and establish a higher standard of services to the community. Our core values of respect, safety, integrity and service will guide us in accomplishing our Mission and Vision.

¹ San Bernardino County 2015 Community Indicators Report

² Census Population Estimates 2013

³ Census Quick Facts 2015

What is in this plan?

This Fiscal Year 2018 Moving to Work Annual Plan complies with the format required by the U.S. Department of Housing and Urban Development (HUD) as outlined in the 2008 Amended and Restated Moving to Work (MTW) Agreement between HUD and HACSB, and also complies with the requirements set forth by HUD in Form 50900. This Plan is separated into the following sections:

- *Section I: Introduction* provides an overview of the layout of the document and HACSB's short term and long term goals.
- *Section II: General Housing Authority Operating Information* provides an overview of the agency's housing portfolio, leasing rates, and wait list information. **This resubmission includes revisions to this section to include information about the conversion of HACSB's Public Housing portfolio under HUD's Rental Assistance Demonstration (RAD) program.**
- *Section III: Proposed MTW Activities* describes the new MTW activities that we plan to pursue in FY 2017, including applicable evaluation criteria and waiver citations that provide the agency with the authority to undertake the new activities.
- *Section IV: Approved MTW Activities* provides information on previously approved uses of MTW authority.
- *Section V: Sources and Uses of Funds* describes the agency's projected revenues and expenditures for FY 2017, local asset management program and use of MTW Block Grant fungibility.
- *Section VI: Administrative* provides required administrative information.





















In September 2016, the Housing Authority of the City of Upland (UHA) and HACSB submitted an application to the U.S. Department of Housing and Urban Development (HUD) for the voluntary transfer of UHA's Housing Choice Voucher (AKA "Section 8") and Public Housing programs to HACSB effective July 1, 2017. The application was approved by HUD for the Housing Choice Voucher program on June 16, 2017, and for the Public Housing program on June 29, 2017. The voluntary transfer resulted in the transfer of 98 Public Housing units and 624 Housing Choice Vouchers from UHA to HACSB on July 1, 2017. Thereafter, HACSB assumed responsibility for both programs, including providing all services to the families served through those programs. This Plan incorporates information about the transferred units and families and how HACSB's Moving to Work initiatives apply to those units and families.

What is "Moving to Work"?

Moving to Work (MTW) is a U.S. Department of Housing and Urban Development (HUD) demonstration program for housing authorities to design and test innovative housing and self-sufficiency initiatives targeted to address local needs. The MTW designation allows participating agencies to waive certain statutes and HUD regulations in order to increase housing choice for low-income families, encourage households to pursue self-sufficiency, and improve administrative and operational cost effectiveness.

As a high-performing, innovative and progressive agency, HACSB received its MTW designation in 2008. In April 2016 the MTW agreement was extended for an additional ten years through 2028. HACSB has completed its eighth year of participation during which time we have developed 27 MTW initiatives. HACSB’s MTW designation allows us to test new methods to improve housing services and to better meet local needs.

A brief timeline of our MTW Plans and Reports follows.

MTW Plan	Approved by HUD
FY 2009 MTW Plan	September 25, 2008
 Amendment 1	 June 29, 2009
FY 2010 MTW Plan	September 30, 2009
 Amendment 1	 November 18, 2009
 Amendment 2	 February 22, 2010
 Amendment 3	 September 15, 2010
FY 2011 MTW Plan	October 18, 2010
FY 2012 MTW Plan	October 5, 2011
 Amendment 1	 November 4, 2011
FY 2013 MTW Plan	September 27, 2012
FY 2014 MTW Plan	May 14, 2014
FY 2015 MTW Plan	February 13, 2015
 Amendment 1A	 May 11, 2015
 Amendment 1B	 N/A. Proposed changes moved to 2017 MTW Plan.
 Amendment 2	 N/A. Proposed changes moved to 2017 MTW Plan.
FY 2016 MTW Plan	November 4, 2015
FY 2017 MTW Plan	February 2, 2017
 Amendment 1	 April 3, 2017
 Amendment 2	 September 27, 2017

MTW Report	Accepted by HUD
FY 2009 MTW Report	April 22, 2010
FY 2010 MTW Report	March 21, 2011
FY 2011 MTW Report	March 20, 2012
FY 2012 MTW Report	July 19, 2013
FY 2013 MTW Report	December 31, 2013
FY 2014 MTW Report	December 31, 2014
FY 2015 MTW Report	December 22, 2015
FY 2016 MTW Report	Submitted to HUD December 28, 2016

Overview of Agency’s Goals and Objectives

Long-Term Goals

Prior to our MTW designation in 2008, HACSB completed a 30-year strategic planning process to develop the agency’s long-term goals. These goals serve to guide us toward achieving our mission and vision. Our short-term milestones and annual accomplishments mark our progress toward realizing the 30-year strategic goals.

Our strategic 30 years goals are:

HACSB 30-Year Strategic Goals	
Strategic Goal 1:	No eligible family waits longer than 10 days for housing
Strategic Goal 2:	Clients have achieved their own personal level of stability and economic independence
Strategic Goal 3:	For those whom a transition is appropriate, the maximum stay in assisted living is 5 years
Strategic Goal 4:	HACSB leaders and supporters are innovative policy makers and influencers of legislation
Strategic Goal 5:	HACSB has secured the resources needed for accomplishing its mission
Strategic Goal 6:	HACSB is a leading developer and provider of affordable housing in the County of San Bernardino
Strategic Goal 7:	HACSB is adequately staffed with well trained and fully developed employees
Strategic Goal 8:	HACSB communication is open, honest and consistent
Strategic Goal 9:	HACSB employees have a high level of morale
Strategic Goal 10:	HACSB clients, programs and properties are embraced by all communities
Strategic Goal 11:	HACSB clients live in safe and desirable homes and communities where they can develop and prosper

The flexibilities provided through our MTW designation assist in our efforts to achieve our long term goals, and our long-term vision aligns with the statutory objectives of the MTW program. HACSB currently has 26 approved MTW activities. Twelve activities address the objective of operational efficiency, nine assist families with their economic independence efforts, and five help expand housing opportunities. As good stewards of taxpayers’ dollars, we ensure optimal use of funds to provide the best quality services to our families. We continually seek to implement innovative solutions that streamline processes, increase efficiency, and help families achieve economic independence. Proactive planning has helped us face the consecutive budget reductions while increasing the number of families served and services provided.

Short-Term Goals

Our long-term goals align with the MTW statutory objectives and our vision of creating a world in which all people have a stable and enriched quality of life. We achieve MTW objectives by aligning our agency's short-term strategic goals with our MTW goals/objectives-

- **Goal 1 - Operational efficiency through innovation** – Maximizing HACSB's economic viability and sustainability through the following strategies:
 - Ensure excellent and efficient stewardship of resources and programs
 - Maintain a workplace environment that attracts and retains capable employees who feel they are making a difference
 - Have an increasingly diverse number of funding sources to provide the programs and services described in the strategic plan
 - Develop a communication program that effectively disseminates information inside and outside the Agency
 - Provide world class customer service

In addition to implementing non-MTW activities to address this goal, we have implemented twelve MTW activities that address this goal (listed in the following table with a statutory objective of "cost effectiveness").

- **Goal 2 – Develop economically independent clients** – Facilitating opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy through the following strategies:
 - Develop and maintain policies programs, and services that foster accountability, responsibility and economic independence
 - Transform client mindset from entitlement to empowerment
 - Partner with external organizations to support clients in acquiring life skills, education and training
 - Assist families in strengthening personal accountability and in transitioning to Home Ownership/Market rentals

In addition to implementing non-MTW activities to address this goal, we have implemented nine MTW activities that address this goal (listed under the self-sufficiency statutory objective in the following table).

- **Goal 3 – Ensure freedom of housing choice** – Providing quality affordable housing opportunities in mixed-income communities with access to excellent quality of life through the following strategies:
 - Improve and expand HACSB's real estate assets
 - Partner with external organizations to leverage funding and development opportunities
 - Develop innovative programs to expand housing opportunities for under-served populations such as homeless veterans and homeless families with children

In addition to implementing the above non-MTW activities to address this goal, we have developed or implemented four MTW activities that address this goal (listed under the housing choice statutory objective on the following table).

The following table shows a list of activities that were included in our MTW Annual Plans.

ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
Activity 1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
Activity 2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Implemented
Activity 3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
Activity 4	Biennial Recertifications	Cost Effectiveness	FY 2009	Implemented
Activity 5	Local Verification Policies	Cost Effectiveness	FY 2009	Implemented
Activity 6	Elimination of Assets	Cost Effectiveness	FY 2009	Implemented
Activity 7	Controlled Program Moves	Cost Effectiveness	FY 2009	Implemented
Activity 8	Local Policies for Portability	Self-Sufficiency	FY 2009	Implemented
Activity 9	Elimination of Earned Income Disallowance	Self-Sufficiency	FY 2009	Implemented
Activity 10	Minimum Rent	Self-Sufficiency	FY 2009	Implemented
Activity 11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
Activity 12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
Activity 13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
Activity 14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented
Activity 15	Pilot Work Requirement	Self-Sufficiency	FY 2010	Implemented
Activity 16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
Activity 17	Local Income Inclusion	Self-Sufficiency	FY 2011	Implemented
Activity 18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
Activity 19	Local FSS program	Self-Sufficiency	FY 2011	Implemented
Activity 20	Term-Limited Lease Assistance Program	Self-Sufficiency	FY 2011	Implemented
Activity 21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
Activity 22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
Activity 23	No Child Left Unsheltered	Self-Sufficiency	FY 2014	Implemented
Activity 24	Transition for Over-Income Families	Self-Sufficiency	FY 2014	Implemented

ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
Activity 25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Not Yet Implemented
Activity 26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017	Not Yet Implemented

Accomplishments

HACSB has made progress toward our long-term strategic goals in the following ways:

- **Goal 1 - Operational efficiency through innovation** – Maximizing HACSB’s economic viability and sustainability:
 - Utilized technology to launch online Wait List portal used for the opening of the HCV Tenant Based Rental Assistance program wait list February 19, 2015 through March 9, 2015. The fully online system allowed applicants to apply any time of day from any device, eliminating wait times at physical offices to apply. A call center was established to assist clients with reasonable accommodation requests and limited English proficiency in applying. HACSB received over 25,000 unique applications throughout the enrollment period.
- **Goal 2 – Develop economically independent clients** – Facilitating opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy:
 - Expanded onsite employment support for clients with the addition of two Career Readiness Coordinators to work with Five Year Lease Assistance families, one Jobs Plus Coach for Maplewood Homes, a CalWORKS Youth Employment Program referral system in partnership with the County of San Bernardino, contracted services through the County Workforce Development Department for three on-site Workforce Development Specialists working specifically with HACSB families, and holding employment resource and opportunity events for clients to be connected to employers and resources.
 - Pursued alternative funding to support and expand resident services such as submitting a \$2.4 million Jobs Plus grant application.
 - Received grant funding to increase internet and broadband to all HACSB sites to help close the digital divide.
- **Goal 3 – Ensure freedom of housing choice** – Providing quality affordable housing opportunities in mixed-income communities with access to excellent quality of life:
 - Continued construction at the Redlands/Lugonia Public Housing site. The modular construction of 85 new units is complete and the property is in the leasing process.

- Phase I of the Waterman neighborhood revitalization closed on tax credit financing and a Groundbreaking was held on June 15, 2015.
- A majority of the Public Housing portfolio has been approved for the Rental Assistance Demonstration Program with expected conversion dates by May 1, 2016. The program will convert the public housing subsidies into a long-term, Project-Based Section 8 rental assistance subsidy, which will provide stable and predictable revenues allowing HACSB to apply for Low-Income Housing Tax Credits and other sources of financing to fund public housing renovations.
- Continued to support expansion of affordable housing through partnerships with developers. HACSB is currently involved with projects in Bloomington, Loma Linda, Chino, and Yucaipa.
- The HACSB affiliate non-profit, KEYS, has been re-structured to focus on supporting housing of special populations with a current focus on homeless Veterans and their families. KEYS has been heavily involved in a county-wide effort to house approximately 400 homeless Veterans within the calendar year and has been instrumental in housing about 200 of those homeless Veterans.

Serving the needs of our residents and helping them on their path to economic independence is a priority at HACSB. The administrative efficiencies from our activities helped create the Career Development Initiatives (CDI) Department that works closely with our families to further our strategic goal of transforming clients' mindsets from entitlement to empowerment. We have also repositioned assets and implemented innovative activities to create quality housing choices for our families. We are pleased with our progress and continue to strive to achieve our 30-year goals.

We are confident that through our work with our partners and through long-term strategic planning, we will achieve our mission of empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout the County of San Bernardino.

Section II: General Operating Information

This section provides an overview of the Housing Authority of the County of San Bernardino's (HACSB) housing portfolio, leasing, and waiting list information.

Agency Overview

HACSB provides affordable housing assistance to more than 10,000 families throughout the County of San Bernardino through the Public Housing program, the Housing Choice Voucher Programs, and special programs such as Shelter Plus Care, Veterans Administration Supportive Housing (VASH) vouchers, Mainstream, and also through our authority-owned portfolio. We provide families a stepping stone through difficult economic times and, in conjunction with community partners, assist them on their path to economic independence.

In September 2016, the Housing Authority of the City of Upland (UHA) and HACSB submitted an application to the U.S. Department of Housing and Urban Development (HUD) for the voluntary transfer of UHA's Housing Choice Voucher (AKA "Section 8") and Public Housing programs to HACSB effective July 1, 2017. The application was approved by HUD for the Housing Choice Voucher program on June 16, 2017, and for the Public Housing program on June 29, 2017. The voluntary transfer resulted in the transfer of 98 Public Housing units and 624 Housing Choice Vouchers from UHA to HACSB on July 1, 2017. Thereafter, HACSB assumed responsibility for both programs, including providing all services to the families served through those programs. This Plan incorporates information about the transferred units and families and how HACSB's Moving to Work initiatives apply to those units and families.

A. Housing Stock Information (Units funded with the MTW Block Grant)

The majority of HACSB's funding from HUD comes in the form of a block grant that combines the Public Housing operating fund, Public Housing capital fund, and MTW Housing Choice Voucher funding into one funding source for HACSB. These funds are used to support the units described in the following tables.

Planned New Public Housing Units to be Added during the Fiscal Year

HACSB does not anticipate adding new Public Housing units in fiscal year 2017-2018. .

Planned New Public Housing Units to be Added During the Fiscal Year										
AMP Name and Number	Bedroom Size						Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5			6+	Fully Accessible
N/A N/A	0	0	0	0	0	0	0	N/A	N/A	N/A
Total Public Housing Units to be Added							0			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other										
If Other, please describe: N/A										

Planned Public Housing Units to be Removed During the Fiscal Year

HACSB has received approval under HUD’s Rental Assistance Demonstration (RAD) program to convert our entire Public Housing portfolio. HACSB’s entire public housing portfolio has been or will be converted to units assisted by either Project Based Rental Assistance or Project Based Vouchers, both of which are commonly referred to as “Section 8” units. Only the Waterman Gardens development is projected to be removed from the Public Housing portfolio in FY 2018. More information about the RAD conversion is included in Exhibit 1 and Exhibit 2 to this Plan.

The following table indicates the planned units to be removed during 2017-2018.

Planned Public Housing Units to be Removed During the Fiscal Year		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
CA019000120 Waterman Gardens	252	RAD Application approved for entire AMP; Waterman Gardens site pending conversion.
Total Number of Units to be Removed	252	

New Housing Choice Vouchers to be Project-Based During the Fiscal Year

In FY 2018, HACSB anticipates awarding 1706 project-based vouchers for developments owned by HACSB, our affiliate non-profit, Housing Partners I, Inc., and in cooperation with other local developers. The following table and narrative descriptions provide more information on planned project-based vouchers.

New Housing Choice Vouchers to be Project-Based During the Fiscal Year		
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project
Ivy at College Park, Chino	8	Family Community, New Development
Veterans' Housing - Various Sites	60	Veterans' Housing, Existing Developments
Veterans' Housing, Loma Linda	37	Veterans' Housing, New Development
Fontana Family Development Project - Fontana	8	Family Community, New Development
Golden Apartments	28	Chronically Homeless, Existing Development
Queens Motel	29	Chronically Homeless, Existing Development
Anticipated Total New Vouchers to be Project-Based	170	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year 2058 Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year 2058

*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.

Ivy at College Park - Chino

In July 2014 Bridge Housing and HACSB negotiated and agreed upon the commitment of 8 Project-Based Vouchers for Phase II of the Ivy at College Park development. This important collaboration provides housing assistance to residents in the higher cost western end of the County. The master-planned community includes market-rate single family homes for sale, market-rate multi-family development, and affordable multi-family housing. Construction of the development is occurring in 2 phases, with phase I of the development completed in 2014 and consisting of 135 affordable family units. Phase II is began construction in the fall of 2015 and will be completed in approximately 18-months.

Veterans' Housing – Various Sites

As part of the Housing Authority's commitment to end veteran's homelessness, we have set aside 60 Project-Based Vouchers for homeless veterans. HACSB intends to award these vouchers through a competitive process which is currently underway.

Veterans' Housing – Loma Linda

The Loma Linda Vets affordable new construction housing development is being developed by META Housing Corporation in partnership with HACSB, HPI, Inc., Veteran's Administration Loma Linda Healthcare Systems, and Volunteers of America. The project is located within the city of Loma Linda and is less than ¼ mile from the Loma Linda Veterans' Hospital. Volunteers of America will provide specialized service coordination, education, health and wellness services, and skill-building classes tailored to meet the specific and timely needs of veteran tenants and their families. The project will consist of 88 apartments for veterans and their families, 50 of which will be supportive housing. All of the units will be restricted to low-income veterans and their families through the use of 50 VASH Project Based Vouchers along with 37 non-VASH Project Based Vouchers from HACSB. Units will contain a fully equipped kitchen/bath and common-areas include a large and centralized community area with a clubhouse, pool, children's play area, community garden, barbecues, and a community room. Construction is protected to complete with the community being ready for occupancy in early summer 2018.

Fontana Family Development Project - Fontana

This site is being developed by the Related Companies of California in partnership with LaBarge Industries, HPI, Inc., and the City of Fontana. Path Ventures will provide on-site resident services for tenants and their families. The development will be constructed on 4.36 acres and include outdoor space, a pool area, tot lots, a computer room, and a community center.

The Fontana family affordable new construction housing development will consist of 69 apartments for low and moderate income families. The project is located at 9420 Sierra Avenue in the City of Fontana. The project is restricted to households with income levels ranging from 30% to 60% of AMI. 100% of the units will be restricted to low and moderate income families through the use of Low-Income Housing Tax Credits, City of Fontana funding, permanent financing and Project Based Vouchers.

The project began construction in early 2017 and will take approximately 12 months to complete. The units are expected to be ready for occupancy in early spring 2018.

Golden Apartment and Queens Motel

The Housing Authority has purchased properties in San Bernardino (Golden Apartment – 28 units) and Victorville (Queens Motel -29 units), the two cities identified by the 2016 Point in Time Count as having the highest number of homeless individuals in the county. After rehabilitation, these combined sites are projected to provide 57 housing units for chronically homeless individuals.

Other Anticipated Changes to the Housing Stock for the Fiscal Year

HACSB does not anticipate any other changes to the Housing Stock during the Fiscal Year.

Other Changes to the Housing Stock Anticipated During the Fiscal Year
None

Examples of the types of other changes can include but are not limited to units that are held off-line due to the relocation of residents, units that are off-line due to substantial rehabilitation and potential plans for acquiring units.

General Description of All Planned Capital Fund Expenditures during the Plan Year

We continue to aggressively pursue the RAD conversion strategy for future rehabilitation of the remainder of our Affordable (public) Housing portfolio. We received approval from HUD in December 2014 to convert our entire Public Housing portfolio under the RAD program, wherein existing Public Housing subsidies are converted to rental assistance (vouchers). The initial phase of the RAD portfolio conversion included rehabilitation work at the following sites:

- 97 scattered site units in AMP 120
- 330 units in AMP 130 (Maplewood Homes)
- 75 units in AMP 150 (Brockton site 19-05)
- 50 units in AMP 160 (Monte Vista site 19-06)

Capital fund is being utilized to complete work identified under the RAD Physical Needs Assessments, which is expected to be 100% completed as of December 2017.

The second phase of the RAD portfolio transaction includes conversion of the following sites:

- 12 scattered site units in AMP 150 (E. 9th Street)
- 125 units in AMP 160 (Colton sites 19-04 & 19-10)
- 217 units in AMP 170 (Barstow sites 19-07, 19-12, 19-13 and Deseret)

These sites are expected to complete conversion under RAD by March 2018 and rehabilitation work will commence shortly thereafter. The extension of the deadline was due to a change in strategy to convert these units to project-based rental assistance (PBRA) rather than project-based voucher (PBV) assistance. The extension allows time for staff to become trained in the new program and implement changes to the current operations software to facilitate a smooth transition.

In 2017 we continued construction of the initial on site phase of the Waterman Gardens revitalization project (the second RAD conversion project) which broke ground in May, 2016. The new development will eventually include over 400 mixed-income housing units, including senior and homeownership units and extensive commercial/community facilities intended to provide employment and training opportunities supporting HACSB's MTW initiatives. Housing affordability remains the primary focus for the development as well as revitalization of the broader neighborhood, as evidenced by the initial RAD application which supported the development of the 75 unit Val 9 Apartments on an adjacent site (completed and occupied in 2016). HACSB and its developer partner have planned a mix of ACC/RAD and project-based voucher units with substantial funding secured through Low Income Housing Tax Credits. The existing 252 ACC units will be replaced on a one-for-one basis (transitioned to RAD project-based vouchers) over the course of the multiple-phase redevelopment. The initial on site phase consisting of 62 units successfully competed for 9% Low Income Housing Tax Credits (awarded September, 2015). The credits were coupled with an FHA-insured loan, and the RAD financing was closed in April 2016. Construction was completed in August 2017.

2017 also saw ongoing pre-development and development work associated with subsequent construction phases of the Waterman Gardens redevelopment project, as well as the second phase of construction at the Redlands-Lugonia site (AMP 150, sites 01, 8, & 9). The 2016 Capital Fund allocation included the fifth year increment of Replacement Housing Factor (RHF) which HACSB has been accumulating to support these redevelopment projects. These funds, which now total in excess of \$3 million, have begun to be drawn down in 2017 to support these efforts.

FY 2018:

The Capital Fund Program 5-Year Plan and Budget is included as part of Appendix C. Capital Fund available for physical improvements at public housing sites has been substantially reduced due to the conversion of subsidy for over two thirds of the portfolio to vouchers under the RAD program. It is anticipated that all public housing units will have been converted under RAD before the end of calendar year 2017. Utilizing Capital Fund, in 2018 HACSB will complete capital improvements identified under the RAD physical needs assessments to insure that the RAD converted units will continue to meet the needs of residents over the long term. Such work will include interior kitchen and bathroom renovations, Section 504 unit accessibility, exterior xeriscaping, and miscellaneous dwelling interior and exterior improvements. HACSB will also continue to implement additional energy improvements agency-wide to augment work completed previously under an Energy Performance contract.

HACSB's major public housing redevelopment efforts will continue in Redlands (AMP 150, sites 19-01, 8 & 9) where the second phase of new construction will commence to add 104 units of affordable family rental housing to the site to compliment the 85 units completed in 2016. Likewise, the third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) is expected to be under construction in 2018 adding approximately 78 affordable family rental units to complete the one-for-one replacement of public housing units formerly located there.

HACSB will strive to implement new resident employment programs under Section 3 to support the variety of Moving-To-Work initiatives described in this plan. Where possible, Capital Funds will be utilized (and leveraged with outside funding) for employment training anchored within the large Public Housing revitalization projects already underway (Redlands-Lugonia and Waterman Gardens). These programs will prioritize training centered around sustainable development and green building practices, property management and maintenance of the newly constructed rental housing, as well as pre-apprenticeship construction training. These efforts are intended to also extend into the neighborhoods surrounding the existing site to promote community-wide revitalization.

B. Leasing Information

Planned Number of Households Served at the End of the Fiscal Year

In FY 2018, HACSB anticipates continued strong rates of leasing for both Public Housing and vouchers. Public Housing units will continue to be converted to project-based voucher units through HACSB’s RAD conversion process, and this change is reflected in the number of Public Housing units anticipated to be leased during the fiscal year.

The following table represents projected average utilization for MTW vouchers and occupancy for the Public Housing units.

HACSB does not have any local non-traditional MTW funded programs.

Planned Number of Households Served at the End of the Fiscal Year		
MTW Households to be Served Through:	Planned Number of Households to be Served*	Planned Number of Unit Months Occupied/Leased***
Federal MTW Public Housing Units to be Leased	116	1,392
Federal MTW Voucher (HCV) Units to be Utilized	8,655	103,860
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	-	-
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	-	-
Total Households Projected to be Served	8,771	105,252

* Calculated by dividing the planned number of unit months occupied/leased by 12.

** 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 PHA should estimate the number of households to be served.

***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

Reporting Compliance with Statutory MTW Requirements

HACSB is currently in compliance with the Statutory MTW Requirements as per the executed Moving to Work Agreement.

Reporting Compliance with Statutory MTW Requirements
<p>If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.</p>
<p>None. HACSB is currently in compliance.</p>

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions

HACSB does not anticipate leasing difficulties for its Public Housing or voucher programs.

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions	
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Public Housing	<p>Barstow AMP 207: High turnover. Possible conversion to PBRA.</p> <p>Funding challenges including potential 95% or lower proration and continuing resolution may result in decreased leasing rate. HACSB intends to freeze leasing in response to the funding situation. Additionally, market rent cost increases resulted in significant PUC increase in 2016 and 2017, which may decrease the number of families HACSB can serve within funding allocation.</p>
Housing Choice Voucher	

C. Wait List Information

Wait List Information Projected for the Beginning of the Fiscal Year

HACSB's wait list strategies vary to match the needs of different communities and housing programs. Applicants may be, and often are, on multiple wait lists at the same time.

HACSB anticipates that community need for affordable housing will remain high in FY 2018. The following table shows the projected number of households on wait lists for Public Housing units and vouchers as of the beginning of FY 2018. HACSB does not currently envision organizational or policy changes to wait lists.

As part of the voluntary transfer of the Public Housing and Housing Choice Voucher programs from the Upland Housing Authority (UHA) to HACSB effective July 1, 2017, the applicants that were on the UHA wait lists have been transferred to HACSB's wait lists. The wait list totals shown in the following tables include these applicants.

Housing Choice Vouchers

HACSB maintains a single tenant-based wait list, which was opened for 19 days in early 2015. We do not anticipate opening the wait list in FY 2018.

As of October 1, 2017, the total number of tenant-based voucher applicants includes 4,068 formerly-UHA Housing Choice Voucher applicants.

Separate site-specific wait lists are maintained for each project-based voucher property.

Public Housing and Rental Assistance Demonstration Units

Site-specific waiting lists are offered by bedroom size for all of HACSB's Public Housing communities. All wait lists under this program are maintained centrally to maximize efficiencies and housing choice.

HACSB's application for conversion of its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program was approved in December 2014, and the process of converting all sites is ongoing. As a result, HACSB has moved all applications currently on the wait lists for the converted Public Housing sites to new site-based RAD PBV wait lists. The remaining applications will be moved to similar lists upon conversion of the remaining sites. The applications will retain their original date and time of application and will be subject to the preferences that apply to the PBV wait list. Applicants will be notified of the change and will be offered the opportunity to opt out of placement on the HACSB PBV wait lists.

As of October 1, 2017, the total number of tenant-based voucher applicants includes 877 formerly-UHA Public Housing applicants.

Wait List Information Projected for the Beginning of the Fiscal Year

Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Public Housing	Other	8,543	Partially Open	Yes, by bedroom size as needed
Rental Assistance Demonstration Sites	Other	11,262	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher Project-Based	Other	23,302	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher Tenant-Based	Community-Wide	17,160	Closed	No

Rows for additional waiting lists may be added, if needed.

* *Select Housing Program* : Federal MTW Public Housing Units; Federal MTW Housing Choice Voucher Program; Federal non-MTW Housing Choice Voucher Units; Tenant-Based Local, Non-Traditional MTW Housing Assistance Program; Project-Based Local, Non-Traditional MTW Housing Assistance Program; and Combined Tenant-Based and Project-Based Local, Non-Traditional MTW Housing Assistance Program.

** *Select Wait List Types* : Community-Wide, Site-Based, Merged (Combined Public Housing or Voucher Wait List), Program Specific (Limited by HUD or Local PHA Rules to Certain Categories of Households which are Described in the Rules for Program Participation), None (If the Program is a New Wait List, Not an Existing Wait List), or Other (Please Provide a Brief Description of this Wait List Type).

*** For Partially Open Wait Lists, provide a description of the populations for which the waiting list is open.

Public Housing: families and seniors by site, by bedroom size
Housing Choice Voucher Project-Based: families and seniors, by site/region and bedroom size

If Local, Non-Traditional Housing Program, please describe:

None. The No Child Left Unsheltered Activity (NCLU) admits families from the Public Housing and Housing Choice Voucher waiting lists through a
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If Other Wait List Type, please describe:

Public Housing: centrally managed, site-specific, by bedroom size
RAD-Converted Former Public Housing: centrally managed, site-specific, by bedroom size
Housing Choice Voucher Project-Based: centrally managed, site/region-specific, by bedroom size

If there are any changes to the organizational structure of the wait list or policy changes regarding the wait list, provide a narrative detailing these changes.

None.

Section III: Proposed MTW Activities

This section provides information detailing proposed new uses of MTW authority, including evaluation criteria and specific waivers to be used.

HACSB has included in this section proposed changes to HACSB's MTW Activity 20: *Term-Limited Lease Assistance* and MTW Activity 22: *Streamlined Lease Assistance*.

HACSB is not proposing any new MTW activities through this Plan.

Activity 20: Term-Limited Lease Assistance – (formerly “Five-Year Lease Assistance Program” and “Term Limits”)

This activity was approved in our FY 2011 Annual MTW Plan and was implemented on January 1, 2012. Our FY 2015 Annual MTW Plan modified the activity to include potential termination from the program for noncompliance with the household’s Supportive Services Agreement. The activity was further modified via our FY 2016 Annual MTW Plan to include an intake hardship exemption for extremely low-income and Triage Step 3 households and to expand the end-of-term hardship exemption. Additional modifications were made via our Approved 2017 Plan, including a change to the subsidy calculation for new families joining the program. HACSB is proposing further modifications via this 2018 MTW Plan, and has included this activity here for approval of the proposed modifications.

1. Activity Description

Through this activity, new non-elderly and non-disabled households admitted to the Housing Choice Voucher program from HACSB’s waiting list, porting in from another jurisdiction, or exercising mobility from HACSB project-based voucher sites¹ are provided with up to five years of housing assistance, with the possibility for extension through a hardship exception that may provide up to two years of additional assistance.

For families currently participating in the activity, the housing subsidy is set at 50% of the applicable payment standard for the unit selected by the family. A modification to the subsidy calculation was approved via our FY 2017 Annual MTW Plan, and will convert the subsidy calculation for new families joining the program to mirror the Streamlined Fixed Assistance Program for New Non-Elderly/Non-Disabled Households. Under that calculation, the family’s rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent, for the duration of assistance. HACSB is currently preparing software modifications to implement this change.

During the term of assistance, HACSB also provides supportive services to the family through its Community Development Initiatives (CDI) department. Services include:

- Needs assessment at intake to determine whether families have the prerequisite resources needed to be successful in this program
- Development of an individualized action plan for success
- Access to three on-site Workforce Development Specialists through our contract with the County Workforce Development Department
- Onsite access to a Family Stabilization Specialist and Employment Services Specialist through HACSB’s contract with the San Bernardino County Transitional Assistance (welfare) Department

¹ Excludes legacy families exercising mobility from an HACSB Rental Assistance Demonstration (RAD) Project-Based Voucher (PBV) site.

- Access to other resources designed to provide the family with meaningful support and tools to enhance the family's chances for success

For families who initially leased under this activity prior to September 21, 2015, and who port to another jurisdiction during the term of assistance, the term limit will continue to apply unless the household is absorbed by the receiving agency. For families who initially lease under this program on or after September 21, 2015, the administration of the voucher will be in accordance with the receiving PHA's policies in accordance with the Federal Register notice published September 21, 2015.

End of Term Hardship Exemption:

Eligibility: A family may be granted an extension of assistance in order to allow the family to complete an educational, job training, or other approved self-sufficiency activity, for an unforeseen and involuntary loss of income, or for other reasons as approved by HACSB. The family must have complied with all requirements of the program, including the Supportive Services Agreement, to be eligible for an extension of assistance.

Term of Extension: Any approved extension shall not exceed two years, and shall be approved in increments of six or twelve months as determined by HACSB.

Total Term: The total term of assistance under the program, including any approved hardship exemption, shall not exceed seven years.

Unit Size Limitation:

Our approved FY 2017 Annual MTW Plan included a modification to this activity to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Households assisted under the Term-Limited Assistance Program must select a unit whose number of bedrooms is within one bedroom of the voucher size. For example, a family with a two-bedroom voucher may select a one-, two-, or three-bedroom unit.

Incentive to Move to Areas of High Opportunity:

Our approved FY 2017 Annual MTW Plan included a modification to this activity to allow HACSB to provide incentive to families in the term-limited lease assistance program to move to areas of high opportunity, as identified by HACSB.

Post-Assistance Tracking Incentive:

Through our FY 2017 Annual MTW Plan, HACSB obtained HUD approval to implement a survey system that will collect information from Term-Limited Lease Assistance families at exit and annually for two years after assistance has concluded. Although participation in the survey will be voluntary, we will provide a monetary incentive for families to complete the survey. Families will receive the incentive payment only upon completion of each survey.

The activity is now entering its fifth year. Currently, 1,082 families participate in the Term-Limited Lease Assistance Program.

The goal of the activity is to enable the families we serve to focus on self-sufficiency efforts while we assist them with their housing needs for a limited term. HACSB has partnered with Loma Linda University to conduct a longitudinal study to monitor the families served through this activity, tracking their goals and accomplishments. We have seen positive outcomes since implementation, including:

- The average earned income for families in the Five-Year Lease Assistance program has increased by 21.5%;
- Full-time employment increased by 18.9%;
- Unemployment decreased by 13.4%

As families progress through the program, we have learned more about the impacts of the activity. Our Career Development Initiatives team worked with families to assist them with the goals identified on their Individual Training and Services Plan (ITSP), and the families in their fourth and fifth years of participation are showing promising momentum. We will continue to work with our Loma Linda University partners to evaluate the families' progress and challenges. We are also very interested in learning what residual impacts the program has on families after they leave the program. In FY 2017 we began implementation of an expansion to the evaluation of the program, which includes a review of family information for up to two years after they leave the program. More information on the study will be provided in future MTW Plans and Reports.

Proposed Modifications

Unit Size Limitation:

Through this proposed modification, HACSB may require families to select a unit that is the same size as their voucher. Families would not be permitted to lease an oversized unit. HACSB anticipates that this modification would be implemented only if the subsidy limitation modification described previously does not result in families selecting appropriately sized units.

Rent Increase Limitation:

Through this proposed modification, HACSB will limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example, the average value of rent increases approved in FY 2016 was 10% of the previous contract rent. This modification would permit HACSB to cap the rent increase at a value less than 10% of the previous contract rent. This modification will provide HACSB with a mechanism to slow the HAP cost increases resulting from continued rent increases. However, HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program.

Subsidy Limitation:

This proposed modification changes the rental subsidy calculation and requires re-approval by HUD.

To encourage families to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB intends to implement a subsidy limitation for over-housed families. Over-housed families have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the applicable HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the family, which results in a greater family rent share than if the family had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount. Through this activity, HACSB will limit the maximum subsidy for over-housed families to the average subsidy rate for families that are not over-housed with the same size voucher.

This change will apply only to families admitted to this activity under the modified rental subsidy calculation approved through HACSB's 2017 Annual MTW Plan. The change will not apply to families assisted through this activity using the current subsidy calculation which sets the HACSB subsidy at 50% of the applicable Local Payment Standard for the unit selected by the family.

Example:

- The current average HAP for families with a two-bedroom voucher and who are leasing a two-bedroom unit in HACSB's local submarket 8 is \$998.
- The current average HAP for families who are over-leased in HACSB's local submarket 8 is \$1122.
- The current HACSB Local Payment Standard (the current maximum subsidy) for a two-bedroom unit in submarket 8 is \$1,780.
- If a family chooses to lease a unit larger than two bedrooms with a two-bedroom voucher within submarket 8, the maximum subsidy will be set at \$998.
 - This maximum subsidy reflects the average subsidy amount for a "right-sized" unit, and will encourage families to choose appropriately sized units.
- This modification reduces the PUC for two-bedroom units within submarket 8 from \$733 to \$715.
 - This modification also prevents inflated HAP expenses resulting from a family's choice to lease an oversized unit.

2. Statutory Objectives

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

3. Anticipated Impacts

This proposed subsidy limitation under this activity is expected to result in lower HAP costs for over-housed families joining the program. Because the modification will not apply to families currently assisted through this activity using the current subsidy calculation which sets the HACSB subsidy at 50% of the applicable Local Payment Standard for the unit selected by the family, the impact of this modification will apply only to newly-assisted families. An impact analysis for the subsidy limitation is included as Appendix G to this Plan.

4. Anticipated Schedule

The proposed modifications will be incorporated into HACSB's policies upon approval of this Plan, and we anticipate that the modification will be implemented in the summer of 2018 or earlier, if possible. However, modifications to HACSB's tenant database software may also be necessary and may delay implementation to a later time.

5. Proposed Metrics, Baselines, Benchmarks, Outcomes, and Data Sources

In accordance with HUD Form 50900, HACSB will continue to report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

No changes to benchmarks are anticipated as a result of the proposed changes. HACSB will use data from its tenant database to supply data related to this activity.

6. Applicable Authorizations

There has been no change in the Attachment C authorizations that were waived under our originally approved Annual MTW Plan for this activity. The proposed modification to the rental subsidy calculation does not require any additional authorization.

Activity 22: Streamlined Lease Assistance Program

This activity was approved in our FY 2013 Annual MTW Plan and was implemented beginning February 1, 2015. Modifications to the activity were approved via our FY 2016 and FY 2017 Annual MTW Plans.

1. Activity Description

Through this activity, HACSB has implemented an alternative subsidy/rent schedule for households participating in the Housing Choice Voucher and Public Housing programs. The activity applies to:

- Public Housing: all current and new households;
- Housing Choice Voucher: all existing and new households not currently participating in or admitted to the Term-Limited Lease Assistance Program.

The rent for families in the Streamlined Lease Assistance program is calculated based on a percentage of gross annual income. A minimum rent and baseline rent also apply. The rent percentages were established by taking into account deductions and allowances permitted under traditional program regulations, and therefore no deductions or allowances are applied to the calculated rent amount calculated. Households participate in either fixed assistance or tiered assistance, based upon family type.

Fixed Assistance Program for Elderly/Disabled Households:

The family's rent share (TTP) is the greatest of 24% of their gross income, the minimum rent, or baseline rent for the duration of assistance.

Fixed Assistance Program for New Non-Elderly/Non-Disabled Households:

The family's rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent for the duration of assistance. This program applies only new non-elderly and non-disabled households in the Public Housing and Project-Based Voucher programs.

Tiered Assistance Program for Existing Non-Elderly/Non-Disabled Households:

The family's rent share (TTP) begins at the greatest of 21% of gross income, the minimum rent, or baseline rent. The income percentage increases by 3% at each subsequent biennial recertification to a maximum of 30%.

A minimum rent of \$125 applies for both Fixed and Tiered assistance. Additionally, a baseline rent for the family is established at each biennial recertification, and future rent amounts may never fall below the baseline rent. If the calculated rent amount exceeds the ceiling rent for Public Housing or the contract rent for Housing Choice Voucher families, the lesser of the calculated TTP or rent amount is applied as the family's rent share.

The goals of this activity are:

- **Help Families Achieve Economic Independence**
 - Easier to understand and budget for rent costs
 - Families retain income increases between recertifications
 - For non-elderly/non-disabled families, tiered rent will help gradually prepare for renting without assistance
- **Administrative Efficiencies**
 - Reduce the number of interim recertifications
 - Simplify the rent calculation process

Unit Size Limitation (Tenant-Based Voucher Programs Only):

- In order to ensure that households choose a unit that is appropriately sized and affordable for their income situation, households assisted under the Streamlined Lease Assistance Program must select a unit whose number of bedrooms is within one bedroom of the voucher size. For example, a family with a two-bedroom voucher may select a one-, two-, or three-bedroom unit.
- This change is intended to promote responsible unit selection among participants. By selecting a unit that is closest to the size prescribed by the voucher, participants will select a unit that is appropriately sized for the family to prevent over- or under-crowding and more likely to be affordable to the family.

This activity was implemented on February 1, 2015, following extensive outreach efforts to educate the families we serve, industry partners, and all HACSB staff about the upcoming program changes. The activity required substantial modifications to our software systems, and those modifications were completed in early 2015 in time for the implementation. Specialized training was conducted for those staff directly involved with the recertification process. A new Fact Sheet was developed, information was shared with HACSB's Resident Advisory Board, and HACSB developed an informational video about the activity. The video is aired in the lobby of HACSB's main program office and was emailed directly to partners and other stakeholders. Additionally, HACSB reviewed the activity with representatives from the HUD Los Angeles field office via conference call, and 18 housing authorities attended a separate conference call hosted by HACSB to provide information about the program and how it would affect portability customers.

At the time of this writing, all existing households have been converted to Streamlined Lease Assistance at their biennial recertification. 78 implementation hardship exemptions have been approved for households for whom the transition to Streamlined Lease Assistance would have caused a substantial increase in the family's share of rent.

Proposed Modifications

Over the past year HACSB has experienced significant increases to HAP costs for families in the Housing Choice Voucher program. The per-unit cost (PUC) was anticipated to increase by \$15 in 2016, but the actual increase reached \$38. The increase is caused by escalating market rents as well as the prevalence of over-housed families in the program. The continued escalation of HAP costs coupled with sharp decreases to program funding have resulted in projected funding deficits exceeding \$19 million by 2020. When additional potential funding reductions resulting from the Federal budget are considered, that deficit projection increases to more than \$27 million. Even under the best-case funding scenario, if no modifications are made to HACSB’s previously approved rent reform activities, we will be unable to continue serving substantially the same number of families. If funding is substantially prorated, we expect that we would need to reduce leasing to less than 93% in order to compensate for funding reductions. As a result, HACSB is proposing several modifications to the Streamlined Lease Assistance program to mitigate the rising program costs without terminating assistance for families.

Family Rent and Subsidy Calculation:

Through this Plan, HACSB proposes to change the subsidy calculation as follows:

	New Career-Able Families	Existing Career-Able Families	Elderly/Disabled Families
Current Calculation	30% of Gross Income*	Tiered Rent: 21/24/27/30% of Gross Income*	24% of Gross Income*
Proposed Calculation	No change.	Tiered Rent: 30/33/36% of Gross Income*	No change.

** Or HACSB’s minimum rent or the Streamlined Lease Assistance baseline rent, whichever is greater.*

This proposed modification will apply to all families participating in the Streamlined Lease Assistance program, except families residing in HACSB’s Public Housing or Rental Assistance Demonstration sites.

At the time of this writing, we are operating under a continuing resolution for FY 2017 appropriations, and it’s unknown at this time when an appropriations bill will be passed by Congress. The appropriations funding levels for FY 2018 are also uncertain. As a result, funding for the coming year is unknown. Some sources have reported HAP funding proration as low as 90%.

In consideration of the lack of information, HACSB is requesting approval to implement one of the following options. At the time when the MTW 2018 Plan is approved by HUD, HACSB will use its discretion to implement one of these options which has the least impact on families and ensures financial viability of the program.

- 1) HACSB is requesting approval to implement the proposed modification to the tiered rent schedule to all families currently participating in the Streamlined Lease Assistance tiered program between January and June 2018. Under this proposal, HACSB

will process a regular or interim reexamination for all families during this six-month period, irrespective of their regularly scheduled biennial reexamination date. At that reexamination HACSB will apply the new family rent calculation of 30% of gross income, or HACSB's minimum rent, or the Streamlined Lease Assistance baseline rent, whichever is greater. HACSB anticipates that we would use the family's most recently reported income information to process the reexamination, which will serve to minimize the financial impact to families when the new rent calculation is applied. Additionally, HACSB will provide an automatic six-month hardship exemption for all families to whom this change applies.

Example: A career-able family currently participating in the Streamlined Lease Assistance tiered program has a regular biennial reexamination scheduled to be effective August 1, 2018. The family's most recent biennial reexamination was effective August 1, 2016. Under this proposal, HACSB will process an interim reexamination for this family effective February 1, 2018. The reexamination will use the family's income information from the August 1, 2016, reexamination, and the family's rent portion will be set at 30% of gross income or \$125 minimum rent or the baseline rent, whichever is greater. An automatic hardship exemption will be applied and the family's new rent portion will not take effect until August 2018. HACSB will process the family's next regular reexamination as scheduled for August 2018. The family's rent portion will continue to be calculated at 30% of gross income or \$125 minimum rent or the baseline rent, whichever is greater.

- 2) However, if funding permits, HACSB will implement the proposed modification to the tiered rent schedule to all families currently participating in the Streamlined Lease Assistance tiered program at their first regularly scheduled biennial reexamination effective January 1, 2018, or later. Families will have the option to apply for a hardship exemption of up to six months; however if funding allows for it, this six month hardship exemption will also be automatically applied to all families.

HACSB intends to implement the additional rent tiers of 33% and 36% only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families. If implemented, families would move to the 33% tier at the next biennial reexamination after moving to the 30% rent tier (two years later) and finally to the 36% tier at the following biennial reexamination (four years later). In the event of unforeseen budget cuts or proration beyond those which are imminently possible at the time of this writing, HACSB may implement the 33% and 36% rent tiers earlier in order to avoid terminating assistance.

HACSB may implement additional minor modifications to prevent further impact to families and reduce the administrative burden of implementing the proposed changes. As an example, HACSB may elect not to conduct the regularly scheduled biennial reexamination for those families recertified in January through June of 2018 whose regular biennial reexamination is scheduled to take place within the twelve months after the recertification.

Subsidy Limitation:

To encourage families to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB intends to implement a subsidy limitation for over-housed families. These are families that have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the family, which results in a greater family rent share than if the family had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount of HACSB's Local Payment Standard. Through this activity, HACSB will limit the maximum subsidy for over-housed families to the average subsidy rate for families that are not over-housed with the same size voucher.

Example:

- The current average HAP for families with a two-bedroom voucher and who are leasing a two-bedroom unit in HACSB's local submarket 8 is \$998.
- The current average HAP for families who are over-housed in HACSB's local submarket 8 is \$1122.
- The current HACSB Local Payment Standard (the current maximum subsidy) for a two-bedroom unit in submarket 8 is \$1,780.
- If a family chooses to lease a unit larger than two bedrooms with a two-bedroom voucher in submarket 8, the maximum subsidy will be set at \$998.
 - This maximum subsidy reflects the average subsidy amount for a "right-sized" unit, and will encourage families to choose appropriately sized units.
- This modification reduces the average PUC for two-bedroom units within submarket 8 from \$733 to \$715.
 - This modification prevents inflated HAP expenses resulting from a family's choice to lease an oversized unit.

This modification will be applied to all new leases.

Unit Size Limitation (tenant-based voucher programs only):

Through this proposed modification, HACSB may require families to select a unit that is the same size as their voucher. Families would not be permitted to lease an over-sized unit. HACSB anticipates that this modification would be implemented only if the subsidy limitation modification described previously does not result in families selecting appropriately sized units.

Rent Increase Limitation (voucher programs only):

Through this proposed modification, HACSB will limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example, the average value of rent increases approved in FY 2016 was 10% of the previous contract rent. This modification would permit HACSB to cap the rent increase at a value less than 10% of the previous contract rent. This modification will provide HACSB with a mechanism to slow the HAP cost increases resulting from continued rent increases. However, HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program.

2. Statutory Objective

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

3. Anticipated Impacts

An impact analysis for the proposed subsidy limitation is included as Appendix G to this Plan. An impact analysis for the proposed modifications to the family rent and subsidy calculation is included as Appendix H to this Plan.

4. Anticipated Schedule

The proposed modifications will be incorporated into HACSB's policies upon approval of this Plan, and will be implemented as soon as possible. We anticipate that the modification will be implemented in early 2018. However, modifications to HACSB's tenant database software may be necessary and may delay implementation to a later time.

5. Proposed Metrics, Baselines, Benchmarks, Outcomes, and Data Sources

In accordance with HUD Form 50900, HACSB will continue report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

HACSB will use data from its tenant database to supply data related to this activity. Further analysis will be conducted upon approval of the proposed modification to determine if it is appropriate to revise the benchmarks for this activity as a result of the proposed changes.

6. Applicable Authorizations

There has been no change in the Attachment C authorizations that were waived under our originally approved Annual MTW Plan for this activity. The proposed modification does not require any additional authorization.

Section IV: Approved MTW Activities

This section provides HUD-required information detailing previously approved uses of MTW authority. In the following pages, we provide an overview of each of our ongoing MTW activities, with an update on any changes anticipated for 2017. In accordance with the HUD Form 50900, activities are organized in separate sections based on whether they are active, not yet implemented, or closed out.

A. Implemented Activities

Activity 1: Single Fund Budget

The flexibility granted under this activity is included in the statutory authorizations granted to MTW agencies. In accordance with HUD guidance, information related to this activity is included in Section V: Administrative.

Activity 2: Strategic Investment Policies

This activity was approved in our FY 2009 Initial Annual MTW Plan and was implemented in November 2010.

1. Activity Description

With the flexibility provided through this activity, HACSB has developed and adopted an investment policy for MTW funds that is consistent with California Government Code Section 53630 and/or HUD-approved investment criteria to the extent such policies are in compliance with applicable OMB circulars and other federal laws. HACSB will invest only in securities authorized under state law that will allow the flexibility to invest productively, efficiently and securely. This activity enables the Housing Authority to achieve a portfolio that is safer, more liquid and contains a competitive yield. Under California investment policies, HACSB will be able to invest in stronger investment instruments with lower transaction costs, thus increasing overall investment returns.

2. Activity Status

Due to the implementation of the U.S. Department of Housing and Urban Development's cash management provisions described in Notice PIH 2011-67, existing PHA held NRA balances will be transitioned to HUD-held program reserves in FY 2016. As a result, most of the HACSB reserves will be held by HUD and HACSB will have limited funds for investment. Any remaining funds will be invested in liquid investments to ensure that they are readily available if needed. Because HACSB does not hold sufficient reserves to invest, the expected amount leveraged after implementation of the activity is \$0.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metric:

- CE #4: Increase in Resources Leveraged

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plans for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 4: Biennial Recertifications

This activity was initially approved in our FY 2009 Annual MTW Plan as a pilot program for elderly and disabled households in the Public Housing and Housing Choice Voucher programs with no other adult members and no earned income. A modification to expand the scope of the activity to apply to all families in both programs was approved via our FY 2012 Annual MTW Plan.

1. Activity Description

Current regulation requires annual income recertifications for most participants of the Public Housing and Housing Choice Voucher programs. This activity allows HACSB to conduct recertifications of households biennially for all households in both the Public Housing and Housing Choice Voucher programs. The expanded initiative was implemented in 2012 with approximately half the households assigned to a biennial schedule. The remaining households were assigned to the biennial schedule in 2013.

2. Activity Status

The first complete cycle of biennial certifications was completed in 2014. HACSB continues to perform income recertifications for all MTW households biennially, with no current plans to modify this activity.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS# 4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics CE #5, SS #1, SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. As a result, HACSB does not anticipate that these metrics will reflect an increase in tenant rent share, household income, positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plans for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 5: Local Verification Policies

This activity was approved in our FY 2009 Annual MTW Plan and was implemented on October 1, 2009.

1. Activity Description

Through this activity HACSB has implemented local verification policies for both the Public Housing and Housing Choice Voucher programs. The verification standard used by HACSB was modified in FY 2011 to establish the following verification hierarchy:

1. Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) is the highest standard of verification.
2. Documents provided by the household and observed to be satisfactory to verify income are the second tier of verification.
3. Third-party written verification is requested as the third tier of verification if additional verification is necessary.
4. Third-party oral verification is permitted as the lowest ranking type of income verification.

2. Activity Status

This activity has simplified the process for our families and the housing staff, reducing staff time spent on verifications and related agency costs. As a result of this activity, staff time spent on verifications has decreased significantly from the baseline time reported. The benchmarks for this activity have been partially met each year from 2010 to 2013, and were fully met in FY 2014 and FY 2015. During FY 2015, the total time spent on verifications decreased by 79% compared to the baseline year.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 6: Elimination of Assets

This activity was approved in our FY 2009 Annual MTW Plan and was implemented on October 1, 2009.

1. Activity Description

Through this activity HACSB fully excludes assets from the calculation of annual income. Information related to assets is not collected and income from assets is not considered as part of the income/rent calculation formula. This activity is applicable to the Public Housing and Housing Choice Voucher programs.

2. Activity Status

This activity has resulted in reduced staff time associated with collection and verification of assets. It also alleviates the reporting burdens on our families, most of whom have modest or few assets.

The benchmarks for this activity were met in FY 2010 and have continued to be met since that time. No staff time is spent calculating asset income in our MTW programs. This activity benefits our families, and no hardship requests have been received related to this activity.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 7: Controlled Program Moves

This activity was approved in our FY 2009 Annual MTW Plan and implemented on February 1, 2010.

1. Activity Description

This activity limits voluntary program moves for Housing Choice Voucher Program participants to once per every two years and only upon verification from their current landlord that they are a tenant in good standing. Exceptions to this policy allow moves related to self-sufficiency, reasonable accommodation, and domestic violence situations.

2. Activity Status

This activity has resulted in a significant decrease in agency costs and staff time spent related to processing moves. In FY 2015, both costs and time spent reflected approximately a 38% decrease over the baselines. The staff time spent per move was lower than the baseline value, but due to the large number of port-ins during the year, the benchmarks for staff time and cost savings were not reached.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

The previously reported standard metrics (SS #1: Increase in Household Income and SS #6: Reducing Per Unit Subsidy Costs for Participating Households) have been removed per HUD's comments during the approval process for HACSB's 2015 Annual MTW Plan.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 8: Local Policies for Portability

This activity was initially approved in our FY 2009 Annual MTW Plan and was modified through our FY 2010 Plan. The initial implementation of this activity began on October 1, 2009 and the work requirement for portability was implemented on August 1, 2010.

1. Activity Description

Through this activity, HACSB applies the requirements of its ongoing MTW activities to inbound portability participants.

2. Activity Status

This activity has resulted in significant staff time savings. In FY 2015, staff hours spent on inbound portability participants were reduced by 68% from the baseline year. All benchmarks for this activity have been fully or partially met since FY 2010.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plans for this activity.

6. Statutory Objectives

This activity addresses the MTW statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures.

Activity 9: Elimination of Earned Income Disallowance

This activity was initially included in HACSB's FY 2009 Initial Annual MTW Plan and became effective on October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs.

1. Activity Description

Through this activity HACSB has eliminated the HUD Mandatory Earned Income Disallowance (EID) from the calculation of total tenant payment in the Housing Choice Voucher and Public Housing Programs.

2. Activity Status

The EID has not been applied to any MTW family since October 1, 2009. Zero staff hours were spent in managing EID for MTW families since that time and the benchmark for this activity has been fully met since 2009. We did not receive any hardship requests related to this activity.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

1. CE #1: Agency Cost Savings
2. CE #2: Staff Time Savings
3. CE #3: Decrease in Error Rate of Task Execution
4. CE #5: Increase in Tenant Rent Share

Standard metrics CE #3 and CE #5 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. Therefore, HACSB does not anticipate that these metrics will reflect a decrease in error rates related to this task or an increase in tenant rent share as a direct result of this activity. Additionally, the baselines for these metrics were established post-implementation, and no further change is anticipated.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures.

Activity 10: Minimum Rent

This activity was approved in our FY 2009 Annual MTW Plan and implemented on October 1, 2009, for recertifications and on January 1, 2010, for all new families.

1. Activity Description

This activity allowed HACSB to increase the minimum rent to \$125 from the current regulatory maximum of \$50 per month for all households in both the Public Housing and Housing Choice Voucher Programs.

2. Activity Status

This activity has resulted in positive outcomes for households paying the minimum rent of \$125. In FY 2016 HACSB analyzed the current income and tenant rent values for families that were paying the minimum rent at the time of HACSB's FY 2014 Annual MTW Report. Of the 1,205 families paying the minimum rent in FY 2014, 1,077 were still actively participating in HACSB MTW programs subject to the minimum rent. 42% of those families increased their income and were no longer paying the minimum rent. The following table illustrates the income and rent changes for these families. There have been no requests for hardship exemption from the minimum rent.

	FYE 2014	FYE 2016	Increase Amount
Average Total Annual Income	\$3,544	\$14,673	\$11,129
Average Annual Earned Income	\$694	\$9,447	\$8,753
Average Tenant Rent Portion	\$240	\$319	\$79

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. HACSB does not anticipate that these metrics will reflect an increase in positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objectives to reduce costs and achieve greater effectiveness in federal expenditures and to assist families to become self-sufficient.

Activity 11: Local Project-Based Voucher Program

This activity was approved in our FY 2009 Initial Annual MTW Plan. Our third amendment to the FY 2010 Annual MTW Plan helped clarify the components of our local program and this activity was implemented in September 2010. A modification was proposed but not approved via Amendment 1B to our FY 2015 Plan. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 MTW Plan.

1. Activity Description

HACSB has implemented a local Project-Based Voucher (PBV) program to increase the availability of quality housing units. The expansion of our housing authority and/or our affiliate nonprofit owned housing stock will allow us to continue to reinvest net income into the acquisition of additional affordable housing units. The flexibilities included under this activity are:

- Up to 100% percent of units in any development may be project-based;
- Up to 25% of the funding committed to vouchers may be allocated for PBV;
- PBV will be allocated to all of the public housing units approved for disposition other than 27 units to be rehabilitated in conjunction with the County Department of Behavioral Health (308 PBV units);
- Households residing in PBV units will not have automatic priority to receive tenant-based vouchers after one year, but instead will have such a priority after two years;
- A local PBV HAP contract which modifies the terms and conditions of the HAP contract, including the ability to execute PBV HAP contracts for groupings of non-contiguous scattered-site properties and to contract for a total number of units by bedroom size within a development rather than for specific units;
- An over-housed household residing in a Public Housing unit that is disposed of and converted to a Project-Based Voucher may remain in its unit and HACSB will subsidize the household based on the size of the unit, not the qualifying voucher size;
- HACSB may require an under-housed household residing in a Public Housing unit that is disposed of and converted to a Project-Based Voucher to move with a voucher for the number of bedrooms for which the household qualifies;
- For a unit other than former Public Housing units, HACSB may designate the unit as a PBV unit and allow an in-place household for which the unit is a wrong-sized unit to remain in occupancy for up to one year, if the owner agrees to accept a PBV contract rent that does not exceed the HACSB subsidy standard for the household for the initial term of the lease.
- Initial contract rent for units owned by HACSB as defined in the PBV regulations may be determined using an HACSB market study that will consider local rental submarkets, in lieu of the requirement to use an independent entity with rents based on an appraisal by a state-certified appraiser.

- HACSB may project-base vouchers for unit types which are not allowable under traditional regulatory PBV. The types of housing which may be assisted through PBV include the following:
 - Shared housing (up to one person per bedroom);
 - Units on the grounds of a penal, reformatory, medical, mental health, or similar public or private institution;
 - Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care;
 - Manufactured homes;
 - Transitional housing;
 - Single-room occupancy;
 - Congregate housing;
 - Other housing types as needed.
- Where appropriate, HACSB will partner with universities, state and local government, and other stakeholders to develop housing and service delivery programs which leverage HACSB and partner resources. Where appropriate and feasible, programs will include both housing and related health care, education, job preparedness, and/or other necessary supportive services for individuals assisted through the programs.
 - To ensure that assisted families receiving on-site supportive services through an HACSB partner continue to reside at the location where the services are provided, HACSB may not provide a tenant-based voucher upon completion of the initial two-year term of assistance. Assisted families will be notified at move-in whether or not they will be eligible to receive a tenant-based voucher.

Rent Reasonableness, HAP, and Vacancy Payments (Shared Housing Units)

HACSB will use its Local Payment Standard (LPS) to determine rent reasonableness and maximum HAP. If a shared housing unit is not fully occupied, HACSB will pay the full HAP for the unit for up to sixty days. After sixty days, the HAP will be prorated to reflect the percentage of occupied bedrooms

HACSB intends to partner with universities, state and local government, and other stakeholders to develop housing and service delivery programs which leverage HACSB and partner resources. Where appropriate and feasible, programs will include both housing and related health care, education, job preparedness, and/or other necessary supportive services for individuals assisted through the programs.

2. Activity Status

At the commencement of this activity in FY2009, HACSB had 349 PBV units. To date, HACSB has increased its PBV units to 1,115 available units. HACSB is currently in the process of implementing policy changes to incorporate the modifications to this activity approved via our FY 2017 Annual MTW Plan.

3. Proposed Modifications

HACSB intends to implement a requirement for the developer/manager to administer a work requirement and/or supportive services program for some project-based voucher (PBV) contract awards. The requirement will apply only if the number of PBV units exceeds a reasonable number or percentage of the total units in the development. The requirement will not apply to developments where conflicting regulation or law exists. HACSB intends to apply this proposed modification only to new PBV awards. A work requirement and/or supportive services requirement would not be applied to existing PBV contracts unless agreed upon by the owner.

When a PBV award includes a work requirement, the work requirement will apply only to non-elderly and non-disabled families residing in PBV units. Adult family members will be required to participate in work-related activities for a minimum of fifteen hours per week. Work-related activities shall include activities removing barriers to gainful employment, activities leading to gainful employment, and employment. HACSB will require the developer/manager to provide supportive services to these families. Supportive services may include, but are not limited to, job skills/employment coaching and job search services, life skills classes, and other services designed to help families meet the work requirement.

For some PBV awards, HACSB may include a supportive services requirement only. Supportive services may include, but are not limited to, educational and employment services, life skills classes, assistance accessing community resources, and other services.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- HC #4: Displacement Prevention
- Local Metric: Units of Project-Based Voucher Assistance Added to the HACSB Portfolio

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objectives

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

Activity 12: Local Payment Standards and Alternative Flat Rents

This activity was approved in our FY 2009 Annual MTW Plan and was modified in our FY 2012 Annual MTW Plan. The activity was implemented on July 1, 2011 for all new lease ups and recertifications. A modification was proposed but not approved via Amendment 1B to our FY 2015 Plan. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 MTW Plan.

1. Activity Description

San Bernardino County is the largest county in the contiguous United States by area and larger than the nine smallest states combined. This MTW activity allows HACSB to conduct a market assessment to develop local payment standards for each of its submarket areas in lieu of the HUD-prescribed Fair Market Rents. The local payment standards accurately reflect the diverse rental submarkets that exist across the vast San Bernardino County.

Due to the nature of the local rental market, in our FY 2017 MTW Plan the HACSB expanded the use of local submarket payment standards to replace the Fair Market Rents as the indicator for establishing flat rents in the HACSB public housing portfolio. The annually established local payment standards by submarket and bedroom size will provide the maximum flat rent that can be charged to public housing residents. The actual flat rent may fall below the local payment standard based on a comparison of like units in the same area consistent with standard industry rent comparable practices. If an annual review of submarket local payment standard indicates an increase or decrease of more than 10% from the current rate, the submarket public housing flat rent will be re-assessed. The new flat rents will be applied in accordance with the rent increase process as detailed in our Admissions and Continued Occupancy Policy and related Codes of Federal regulation that govern our public housing program.

2. Activity Status

Since implementation, this activity has shown a significant improvement in the number of families able to move to areas of opportunity. We have nearly met or exceeded the benchmarks for our local metric, which measures the number of households residing in the two submarkets with the highest poverty and minority concentration. Overall, the number of households residing in these two submarkets has decreased by 9% since implementation. This change reflects an increase in the number of families that have relocated out of these submarkets into other areas of greater opportunity. HACSB anticipates that this trend will continue, and that the number of families relocating out of these submarkets will hold steady or increase slightly.

HACSB is currently in the process of implementing policy changes to incorporate the modifications to this activity approved via our FY 2017 Annual MTW Plan.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #8: Households Transitioned to Self-Sufficiency
- HC #5: Increase in Resident Mobility
- Local Metric: Average HAP Cost
- Local Metric: Households Able to Move from Areas of Poverty and/or Minority Concentration

5. Changes to Authorizations

None.

6. Statutory Objective

This activity addresses the MTW statutory objective to give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

Activity 13: Local Inspection Policies

This activity was approved in our FY 2010 Annual MTW Plan and was implemented on May 1, 2011. A modification to expand biennial inspections to all MTW units was approved via our 2015 Annual MTW Plan and will be implemented in FY 2016 and FY 2017.

1. Activity Description

This activity allowed HACSB to develop and implement local inspection standards for the Housing Choice Voucher (HCV) program that have increased operational efficiencies and ensured better housing options for low-income families. A modification to this activity was approved via our FY 2015 Annual MTW Plan. Biennial inspections will be conducted for all units, and the property rating system currently used to determine the frequency of inspections for each unit will be eliminated. Assisted units that are currently inspected annually will be moved to a biennial inspection schedule, with 50% of those units to be inspected in FY 2016 and the remaining 50% to be inspected in FY 2017. No change was made to HACSB's enhanced local inspection standards.

2. Activity Status

In FY 2013, HACSB completely outsourced our HCV inspections. This change resulted in additional staff time and cost savings. We continue to perform quality checks of our portfolio for accuracy, inspection standards, and customer satisfaction. The percentage of inspections that have met our quality standards and qualified for biennial inspections has been well above the expected outcome. In FY 2015, HACSB met and exceeded our benchmark savings of \$128,159 by \$223,505. Additionally, the total staff time has decreased by over 91%, in spite of the additional time spent per inspection as a result of our local enhanced standards, largely due to the outsourcing of inspections. We anticipate that the cost and time savings will continue in future years.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

Standard metrics CE #2 and CE #3 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost savings. As a result, HACSB does not anticipate that these metrics will reflect a decrease in error rates related to this task or an increase in staff time savings as a direct result of this activity.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 14: Local Asset Management Program

1. Activity Description

The First Amendment to the Standard MTW agreement executed on May 21, 2009 allowed HACSB to design and implement a local asset management program. As per our FY 2012 MTW Annual Plan and in accordance with the federal Office of Management and Budget (OMB) Circular A-87, we elected to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. Detailed information is provided in Appendix A.

2. Activity Status

None.

3. Proposed Modifications

None.

4. Measurement Revisions

None.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 15: Pilot Work Requirement

This activity was approved in the FY 2010 Annual MTW Plan and the work requirement was implemented on January 1, 2013, for the Maplewood Homes Public Housing community. The work requirement was implemented on August 1, 2010, for all inbound portability participants. HACSB will sunset the work requirement at Maplewood Homes in FY 2016.

1. Activity Description

Maplewood Homes Public Housing Community: This component required all non-elderly and non-disabled household members at Maplewood Homes Public Housing Community to participate for a minimum of 15 hours per week in work-related activities. Work-related activities were defined as participation in any one of the three phases described below. Residents were permitted to participate in each of the phases for up to two (2) years, after which they were required to meet the requirements of the next phase:

Phase 1: activities removing barriers to gainful employment

Phase 2: activities leading to gainful employment

Phase 3: employment

In FY 2016 the Maplewood Homes community was converted under the Rental Assistance Demonstration (RAD) program in. As a result of the requirements of the RAD program, HACSB is unable to mandate participation in work-related activities, and HACSB will sunset the work requirement at Maplewood Homes in FY 2016.

Inbound portability participants: This component requires all non-elderly and non-disabled adult household members of the incoming portability family to be employed at least 15 hours per week within our County or within a reasonable driving distance prior to the execution of the HAP contract and throughout their participation in our program. Once admitted to HACSB's jurisdiction, families that do not meet this requirement will have their previous employment income imputed until new employment is obtained. This requirement ensures that families make educated decisions prior to their move to San Bernardino and encourages them to continue on their path to economic independence.

2. Activity Status

FY 2016 was the final year in which the work requirement at the Maplewood Homes Public Housing community was administered. In that time, the activity achieved positive outcomes, including:

- Earned income increased by 14.7%, well above the benchmark goal of a 5% increase.
- Employment increased by 19.4% for work-able heads of household.

The work requirement for port-in families is ongoing, and HACSB will continue to report outcomes via the Annual MTW Report.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #4 and SS #5 were added in HACSB's 2015 Annual Plan per HUD's request.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

Activity 17: Local Income Inclusions

This activity was approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. This activity was modified through HACSB's FY 2015 MTW Plan.

1. Activity Description

This activity allows HACSB to modify the rent calculation to include or exclude certain income sources that are currently excluded or included, respectively, under regulation. The modifications to the rent calculation are:

- Foster care income is fully included;
- Sanctioned Temporary Assistance to Needy Families (TANF) income, whether due to non-compliance with self-sufficiency requirements, fraud or any other sanction reasons authorized by CALWORKS, except term limits, is fully included;
- Adoption assistance payment income is fully included (effective at each family's first biennial recertification effective on or after October 1, 2015);
- The earned income of full-time students other than the Head of Household, spouse, and co-head of household is fully excluded (effective at each family's first biennial recertification effective on or after October 1, 2015).

2. Activity Status

The modifications to this activity have been implemented and are ongoing.

This activity is intended to simplify the income calculation process as well as to provide incentive for families whose welfare income is sanctioned to achieve compliance with welfare requirements. HACSB's partnership with the San Bernardino County Transitional Assistance Department (TAD), which began in 2014, also aims to encourage families to achieve compliance and end their sanction. Through our Memorandum of Understanding, HACSB and TAD are able to share data regarding mutual customers, identify sanctioned families, and conduct joint outreach to those families. Our participants benefit from having a direct contact at the welfare department and HACSB staff to help guide them through the process to cure their sanction. HACSB and TAD are currently working together to modify our outreach processes to further enhance the likelihood of the family curing their sanction and maintaining compliance with program requirements.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metric:

- CE #5: Increase in Tenant Rent Share

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity. The proposed modifications do not require any additional authorization.

6. Statutory Objective

This activity addresses the MTW statutory objective to reduce costs and increase self-sufficiency.

Activity 18: Property Management Innovation

This activity was approved in our FY 2011 Annual MTW Plan and implemented on January 1, 2012.

1. Activity Description

This activity allowed HACSB to develop a property management innovation program that reflects private sector property management principles. The activity has the objective of implementing policies that are used in the private sector to decrease management costs, improve the quality of our units, and assist our tenants in becoming familiar with private sector property management principles. All residents signed a new lease which incorporated all the changes proposed in the activity. The lease reflected the following changes approved by HUD in our FY 2011 plan:

- a. 3-Day Notice to Pay or Quit (previous policy was 14 days).
- b. NSF fees of \$25.00 for first and \$35 for additional items (previous policy was \$25.00).
- c. Late fees increased from \$20 to \$50.
- d. Security deposits equal to one month's market rent (current security deposit charged is \$500.00)
- e. Implement a holding deposit of \$200.00
- f. Agency will choose lower of flat rent or 30% income rent for residents.
- g. Grievance Process – Previous two step process was replaced with a single on site settlement conference with staff for timely and effective resolutions to issues.

2. Activity Status

As reported in our FY 2015 Annual MTW Report, the activity has resulted in cost savings and administrative efficiencies gained from the streamlined grievance process as well as the reduction in arbitration and unit turnaround costs. As a result of HACSB's ongoing conversion of our entire Public Housing portfolio through the Rental Assistance Demonstration (RAD) program, the following components of this activity will be eliminated in FY 2016 and FY 2017:

- a. 3-Day Notice to Pay or Quit
- g. Modified grievance process

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objectives

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Activity 19: Local FSS Program

This activity was approved in our FY 2011 Annual MTW Plan and was implemented on July 1, 2012.

1. Activity Description

HACSB has developed a pilot local FSS (Family Self-sufficiency) program to help families in their self-sufficiency efforts. Through our local FSS program, program participants are eligible to receive the balance of their escrow savings account at the end of their FSS contract if they voluntarily terminate their assistance from the Housing Choice Voucher or Public Housing program due to self-sufficiency efforts.

2. Activity Status

Since implementation, 147 families have enrolled in the local FSS program. Seven families have successfully completed the program and seventeen have voluntarily terminated from the program leaving a total of 123 families actively enrolled. 66 families are enrolled in the program under the guidelines of this activity and 57 are enrolled under the traditional FSS program guidelines as a control group to compare and contrast with our local program participants. We intend to follow both sets of families throughout their five-year term to identify which families have the greatest success in completing the FSS Contract of Participation. All of the families who successfully graduated from the program were enrolled in the program under the guidelines of this activity.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #2: Increase in Household Savings
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #2, SS #4, SS #5, SS #6, and SS #7 were added in HACSB's 2015 Annual Plan per HUD's request.

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

Activity 20: Term-Limited Lease Assistance – (formerly “Five-Year Lease Assistance Program” and “Term Limits”)

This activity was approved in our FY 2011 Annual MTW Plan and was implemented on January 1, 2012. Our FY 2015 Annual MTW Plan modified the activity to include potential termination from the program for noncompliance with the household’s Supportive Services Agreement. The activity was further modified via our FY 2016 Annual MTW Plan to include an intake hardship exemption for extremely low-income and Triage Step 3 households and to expand the end-of-term hardship exemption. Additional modifications were made via our Approved 2017 Plan, including a change to the subsidy calculation for new families joining the program. A modification is proposed through this 2018 Plan, and additional information related to this activity has been relocated to Section III.

Activity 22: Streamlined Lease Assistance Program

This activity was approved in our FY 2013 Annual MTW Plan and was implemented beginning February 1, 2015. Modifications to the activity were approved via our FY 2016 and FY 2017 Annual MTW Plans. A modification is proposed through this 2018 Plan, and additional information related to this activity has been relocated to Section III.

Activity 23: No Child Left Unsheltered

1. Activity Description

This activity was proposed and approved via HACSB's FY 2014 Annual MTW Plan and implemented on April 1, 2015.

The No Child Left Unsheltered program aims to end homelessness of any unsheltered family with children in San Bernardino County, with special attention to the education and well-being of the children and the economic advancement of the parents. No Child Left Unsheltered (NCLU) will help address extremely critical needs of unsheltered families in the county by offering Housing Choice Voucher rental subsidies to families who are identified as eligible unsheltered homeless families with children. The program will also provide families with supportive services and resources such as emergency relief, school connections with community support, and job training for parents.

Through this activity, HACSB has set aside 40 Housing Choice Vouchers to be made available to eligible families. . The rental subsidy is calculated using the Streamlined Lease Assistance program methodology. HACSB has partnered with a variety of local community service providers, including the school system, to identify families, particularly those with school-age children, who are unsheltered. Each identified family will be encouraged to apply for assistance, and if eligible, will receive assistance after being selected from the waiting list using a preference specifically for this program.

2. Activity Status

This activity was implemented on April 1, 2015.

In March 2015, the HACSB Housing Commission and Board of Governors approved the award of the 40 project-based voucher units reserved for this activity to units within the HACSB-owned and HACSB-affiliated non-profit housing stock. HACSB is authorized to award these contracts through a non-competitive process under its Local Project-Based Voucher MTW Activity (activity 11), approved by HUD through HACSB's 2009 Annual MTW Plan. Families housed through this activity typically have significant challenges in locating housing through the traditional tenant-based voucher program. This award gives HACSB, as the property owner, the ability to house the families more quickly and with more flexibility than in the traditional tenant-based voucher program, thus reducing the wait for housing from upwards of 60 days to only a few days within this non-traditional program.

HACSB selected the locations of the 40 project-based voucher units using data from the most recent homeless point-in-time survey. The units will be distributed throughout the county as follows:

Property Owner	Number of Units	Communities
HACSB	26	Kingsley Patio Homes, Montclair Stone Creek Apartments, Loma Linda Sunset Gardens, Yucaipa Hampton Court Apartments, Redlands Andalusia, Victorville Mesa Gardens, Hesperia
HPI Property Acquisitions LLC	10	Kendall Drive Apartments, San Bernardino Kendall Park Apartments, San Bernardino
Summit Place LLC	4	Summit Place, Ontario

This activity served 21 families in FY 2016, and an estimated \$74,081 in funds were leveraged through the San Bernardino County Department of Behavioral Health for two part-time employees to serve NCLU customers.

3. Proposed Modifications

HACSB intends to modify this activity to allow flexibility to use either project-based vouchers, tenant-based vouchers, or Public Housing units to satisfy the housing needs of families served through this activity. Up to sixty combined units from these three categories will be available for this activity.

HACSB intends to expand this activity to allow participation by young adults participating in the Department of Children and Family Services Foster Care Aftercare program. Services will target low-income young adults age 18-21 in the Aftercare program who are in need of housing support to transition to stable independent living. Individuals in the Aftercare program receive only limited services through the Foster Care program and are ineligible for housing support through the Foster Care program. Assistance under this modification will be subject to the availability of funds.

To be eligible for housing support through this program, the household must:

- Be referred by the San Bernardino County department of Children and Family Services; and
- Be a low-income family as defined by HUD; and
- Meet HACSB’s criminal history background screening requirements; and
- Be an active participant in the Aftercare program.

HACSB anticipates that the individuals served through this program will be primarily single individuals, but may also include families with one or more dependent children.

Through this modification, HACSB will provide each eligible family up to three years of housing support through the Housing Choice Voucher program. The term of support will coincide with the family's enrollment in the Aftercare program, and the subsidy will be calculated using HACSB's Streamlined Lease Assistance program (MTW Activity 22) methodology. Additionally, the family will be required to engage in supportive services through HACSB's Career Development Initiatives (CDI) department and to complete an Individual Training and Services Plan. To ensure that services provided by the Foster Care program and HACSB's CDI department continue to be accessed during the term of assistance, the family may not exercise portability or mobility.

The family may request an extension of assistance of up to one year beyond their participation in the Foster Care Aftercare program. HACSB will apply the same hardship eligibility criteria and approval procedures as established for the Term-Limited Lease Assistance Program (MTW Activity 20).

To support this modification, HACSB proposes to expand the number of units reserved for the NCLU program to add twenty tenant-based housing choice vouchers specifically for families participating in the Aftercare program, for a total of sixty units available for this activity.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #4: Increase in Resources Leveraged
- SS #8: Households Transitioned to Self-Sufficiency
- HC #3: Decrease in Wait List Time
- HC #7: Households Assisted by Services that Increase Housing Choice
- Local Metric: Households Housed through This Activity

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our originally approved Annual MTW Plan for this activity. The proposed modification does not require any additional authorization.

6. Statutory Objective

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

Activity 24: Transition for Over-Income Public Housing/Housing Choice Voucher Families

This activity was submitted and approved via our FY2014 Annual MTW Plan. It was implemented on April 1, 2015, and modified via our FY 2015 MTW Plan to exclude current participants of our Family Self-Sufficiency program.

1. Activity Description

In an effort to create more housing opportunities for families on our Public Housing and Housing Choice Voucher waiting lists, and in recognition of certain families attaining self-sufficiency, HACSB has implemented this activity to transition families who have an annual income which exceeds 80% of area median income (“over-income”) off of housing assistance. This activity applies to the Public Housing program, Tenant-Based Housing Choice Voucher program, and Project-Based Voucher program.

Through this activity, over-income families will be given a six-month transition period. After the six-month transition period, families will transition to receiving no housing assistance from HACSB. Public Housing and Project-Based Voucher families will be required to move and HCV families will have the option of remaining with their current landlord with no assistance or locating alternate housing.

Elderly/disabled families and participants of the Family Self-Sufficiency and Homeownership programs are exempt from this activity. The transition period begins for existing families identified as over-income on April 1, 2015, and at interim or recertification for families that become over-income after April 1, 2015.

If, during the six-month transition period, an over-income family’s income falls below 80% of the AMI, then the family will no longer be considered over-income and will not transition off of the program.

Families in the six-month transition period may also qualify for a hardship exemption from this activity for no-fault loss of income and/or death of a family member with income if the change in income results in the family’s income falling below 80% of AMI. If a hardship exemption is approved for such situations, the family will be removed from the six-month transition period and will not transition off the program.

2. Activity Status

This activity was implemented effective April 1, 2015. At implementation, 89 currently-assisted households were identified as “over-income” and given notice of the six-month transition period. Ultimately, 49 of those families were removed from the transition either due to a hardship or because they were determined to be no longer over-income. This activity is ongoing and we will report further outcomes via our FY 2016 Annual MTW Report.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metric:

- SS #8: Households Transitioned to Self-Sufficiency

5. Changes to Authorizations

There has been no change in the Attachment C authorizations that were waived under our originally approved Annual MTW Plan for this activity.

6. Statutory Objective

This activity addresses the statutory objective to provide incentives to families to achieve self-sufficiency.

Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing

1. Description of the MTW Activity

This activity allows HACSB to apply an amended definition of elderly for the project-based vouchers at the Horizons at Yucaipa Affordable Senior Housing development in order to meet both the City of Yucaipa's requirements for affordable senior housing as well as the age requirement for the special needs population to be served by units financed under the Mental Health Stabilization Act (MHSA). For purposes of this property, there are two definitions of an elderly (senior) individual.

The Horizons at Yucaipa Affordable Senior Housing development is a two-phase, 77-unit new construction development in the City of Yucaipa. Phase I of the development is 50 units on approximately 4.2 acres of vacant land, and includes 49 Project-Based Vouchers and one manager's unit. Phase II will include 27 units and will also be developed for seniors at least 55 years of age. The Phase II building will incorporate into the Phase I building so amenities can be shared and costs reduced. The development will be 100% affordable housing financed through a combination of the following funding sources:

- 4% Low Income Housing Tax Credits
- Tax Exempt Bond funding
- County HOME
- County Mental Health Services Act funding (MHSA)
- Fee deferrals from the City of Yucaipa
- Permanent debt

Phase I contains 50 units. 10 of the 50 units in Phase I are reserved as MHSA units and carry an age restriction of 60 years old. The property will operate as affordable housing for seniors. For the 10 MHSA units, an elderly (senior) individual shall be defined as one who is 60 years of age or older in order to meet the MHSA requirements. For the remaining PBV units, an elderly (senior) individual shall be defined as one who is 55 years of age or older in order to meet the City of Yucaipa's senior housing requirements.

2. Activity Status

In 2015 HPI broke ground on the Horizons at Yucaipa development, and construction of Phase I was completed in February 2017. The phase achieved full lease-up and full occupancy in March 2017. HPI is currently looking at financing options to begin construction of phase II, 27 additional senior units, in the summer of 2018.

3. Proposed Modifications

None.

4. Measurement Revisions

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metric:

- HC #4: Displacement Prevention
- HC #5: Increase in Resident Mobility
- Local Metric: Additional Units of Housing Made Available (same as Standard Metric HC #1)
- Local Metric: Seniors 55 to 60 Years of Age Housed through This Activity

5. Changes to Authorizations

None.

6. Statutory Objective

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

B. Not Yet Implemented Activities

Activity 26: Local Disaster Short-Term Rental Assistance Program

In August 2016 the massive Blue Cut Fire burned more than 36,000 acres in the Cajon pass area of San Bernardino County. The fire caused the complete shutdown of the Interstate 15 freeway and railroad lines, mandatory evacuations of an estimated 82,000 persons in at least six cities, and destroyed 105 homes and 216 minor structures¹. In the immediate aftermath, approximately seventy families displaced by the fire were in need of temporary assistance to stabilize their housing situation.

The Blue Cut Fire illustrated the need for HACSB to have in place a mechanism to provide temporary housing assistance to families in the event of certain local disasters. This proposed activity is designed to meet that need.

1. Description of the MTW Activity

Through this activity HACSB will implement a short-term rental assistance program to provide temporary housing choice voucher assistance to families displaced as the result of a local disaster. Except as noted below, HACSB's policies for the Housing Choice Voucher Program shall apply to the Local Disaster Short-Term Rental Assistance Program.

Determination of Local Disaster: Assistance in this program will be limited to families displaced as the direct result of a local disaster. A local disaster is an event that occurs within the County of San Bernardino and may include a natural disaster such as an earthquake, fire, flood, or storm, an act of terrorism, or other event as determined by HACSB. The qualification of a local disaster would be declared by HACSB through a resolution of its governing board.

Wait List: HACSB will maintain a separate wait list for this activity. The wait list will be opened only when a local disaster is declared through a resolution of HACSB's governing board and only to individuals displaced as a direct result of the local disaster.

This program is not a set-aside. No vouchers will be reserved for this activity. Rather, the funding source will be the MTW Block Grant. Assistance provided through this activity may be offset by a decrease in the number of families served through the Housing Choice Voucher Program. However, because this activity will provide short-term assistance to families, any potential offset would be minimal and take place through normal attrition within the program. As an example, if ten families receive one year of assistance through this activity, the offset to the Housing Choice Voucher Program would not be ten families. Because the average length of stay for current non-elderly and non-disabled families in the Housing Choice Voucher Program is nearly 10 ½ years,

¹ “*CalFire Incident Information – Blue Cut Fire*,” fire.ca.gov, August 23, 2016.
http://www.fire.ca.gov/current_incidents/incidentdetails/Index/1391

servicing ten families through one year of short-term assistance is roughly equivalent to servicing one family through our Housing Choice Voucher Program.

Eligibility: Families assisted through this activity will be subject to eligibility screening. At a minimum, each family must qualify as low-income (having gross annual income at or below the HUD-published Area Median Income adjusted for family size) and pass HACSB’s criminal history background screening.

Term of Assistance: The term of assistance shall be determined by HACSB based upon the nature of the disaster at the time the local disaster is declared. In general, HACSB anticipates the term of assistance shall be six (6) to twelve (12) months. If appropriate, HACSB may provide a hardship extension. In any case, the total term of assistance shall not exceed twenty-four (24) months.

Subsidy Calculation and Reexamination: The rental subsidy and tenant rent portions shall be determined using the formulas established through HACSB’s MTW Activity 22: Streamlined Lease Assistance Program. Please refer to the detailed description of the Streamlined Lease Assistance Program in Section IV of this plan for additional information. No reexamination of income will be conducted during the term of assistance, regardless of the length of the term. The table below summarizes the subsidy calculation formula.

Household Type	Tenant Rent Portion	HACSB Subsidy
Elderly and/or Disabled Households	The greater of: <ul style="list-style-type: none"> • 24% of gross income • HACSB’s minimum rent (currently \$125) • The baseline rent 	Contract rent less tenant rent portion
Non-Elderly and Non-Disabled Households	The greater of: <ul style="list-style-type: none"> • 30% of gross income • HACSB’s minimum rent (currently \$125) • The baseline rent 	Contract rent less tenant rent portion

Leveraging of Resources: In order to maximize the benefit to assisted families, whenever possible HACSB will engage community partners to provide additional funding, housing stabilization services, and related supportive services to the families assisted through this activity.

HAP Contract and Lease: The terms of the lease and HAP Contract shall be the same as the term of the Local Disaster Short-Term Rental Assistance.

Portability: Families assisted through this activity may not exercise portability to another jurisdiction unless the receiving PHA will absorb the family.

Subject to Availability: Assistance provided through this activity shall be subject to the availability of funding as determined by HACSB.

2. Implementation Update

Please refer to the timeline for implementation below.

3. Timeline for Implementation

HACSB received approval of this activity via its 2017 Annual MTW Plan, Amendment 2, in April 2017. We are now working to incorporate policy revisions to facilitate implementation of the activity. We anticipate that this activity will be operational by Fall 2017. However, HACSB will only house families through this activity in the event of a locally declared disaster.

4. Changes or Modifications

None.

C. Activities on Hold

Activity 3: Alternate Assessment Programs

This activity was approved in our FY 2009 Annual MTW Plan and was placed on hold in FY 2011.

1. Activity Description

This activity was approved through HACSB's FY09 Annual MTW Plan and has not been implemented. The activity was placed on hold via HACSB's FY10 Annual MTW Plan.

The activity allows HACSB to opt out of the HUD SEMAP and PHAS scoring systems and establish its own program assessment systems designed to measure the quality and timeliness of work performed under the MTW Agreement.

HACSB formally opted out of the PHAS and SEMAP on December 8, 2010, and will continue to retain its high performer status until a new MTW-wide successor system is adopted, at which time HACSB can be fully scored under that system.

2. Reason(s) for On-Hold Status

At HUD's 2009 Annual MTW Conference we learned that there was an effort to establish an MTW-wide successor to the Section Eight Management Assessment Program (SEMAP) and Public Housing Assessment Program (PHAS) systems currently in place. Rather than develop its own assessment system, HACSB determined that it would instead place this activity on hold until the MTW-wide assessment system is implemented. The MTW-wide assessment system is still in development, and this activity remains on hold pending approval and implementation of that system.

3. Plan for Reactivation

HACSB continues to participate in a working group consisting of team members from various MTW agencies nationwide in an effort to develop a replacement assessment. The working group has been actively working on this project and is close to making a recommendation.

4. Reimplementation Timeline

The exact date for implementation of the MTW-wide assessment system is not yet known. The system will need to be approved by HUD prior to implementation, and a target date has not yet been set.

5. Non-Significant Changes or Modifications

No modifications are proposed for this activity.

D. Closed Out Activities

Activity 16: Operating Subsidy for Vista del Sol

1. Approval and Implementation Years

This activity was approved through the second amendment to our FY 2010 Annual MTW Plan and implemented on April 23, 2010.

2. Reason(s) For Close-Out

On September 15, 2010, HACSB executed a Project-based Voucher contract, and no longer needs the operating subsidy.

3. Year the Activity was Closed Out

This activity was closed out via HACSB's FY12 Annual MTW Plan.

Activity 21: Utility Allowance Reform

1. Approval and Implementation Years

This activity was approved in our FY 2012 Annual MTW Plan; it was never implemented.

2. Reason(s) For Close-Out

This activity allowed HACSB to develop a flat utility allowance schedule for the Housing Choice Voucher Program based on the consumption methodology versus the traditional engineering methodology. However, subsequent development of other programs—namely, our Five Year Lease Assistance Program and the Streamlined Lease Assistance Programs – eliminate the need for a utility allowance. These programs are designed to incorporate the cost of utilities into the subsidy amount without the need to apply a utility allowance separately. As a result, the utility allowance schedule is no longer necessary.

HACSB will continue to monitor the success of the Streamlined Lease Assistance and Five Year Lease Assistance programs but at this time, the Agency has postponed utility allowance reform indefinitely.

3. Year the Activity was Closed Out

This activity was never implemented.

Section V: Sources and Uses of MTW Funds

A. MTW Plan: Sources and Uses of MTW Funds

The following tables reflect anticipated MTW funding and expenses based upon information available to HACSB at the time of this writing. Some information, such as the Federal budget for FY 2017 and the amount of program funding HACSB will receive, is currently unavailable. As a result, the values reported at the time this Plan is posted for public comment may change when this Plan is presented to the HACSB Housing Commission and Board of Governors for approval, and/or when the Plan is submitted to HUD for approval.

Additionally, due to the conversion dates of HACSB’s Public Housing sites under the Rental Assistance Demonstration program, some income and expense line items reflect \$0. This change reflects the change from Public Housing funding to Housing Choice Voucher funding.

Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$ -
70600	HUD PHA Operating Grants	77,752,816
70610	Capital Grants	3,195,559
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	5,952,276
71100+72000	Interest Income	-
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	3,878,599
70000	Total Revenue	\$ 90,779,250

Estimated Uses of MTW Funding for the Fiscal Year

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

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$ 7,553,418
91300+91310+92000	Management Fee Expense	415,261
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	-
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	685,475
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	175,177
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	47,296
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	231,644
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	213,237
97300+97350	Housing Assistance Payments + HAP Portability-In	81,457,741
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
90000	Total Expenses	\$ 90,779,250

Description of Activities that will Use Only MTW Single Fund Flexibility

In December 2014 HACSB was approved for conversion of its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program. As units are converted the existing Public Housing funding will be converted to voucher funding. The converted funding is subject to the single-fund flexibility authorized under the second amended MTW Agreement between HACSB and HUD, which allows HACSB to combine Public Housing Operating Funds, Public Housing Capital Funds, and voucher program funds, for the purposes specified in the MTW Agreement.

Single-fund flexibility is crucial to HACSB’s affordable housing development efforts. By leveraging multiple internal sources (Capital Fund, RHF, Voucher funding), HACSB is able to maximize funding from private sources and therefore is able to develop a greater number of housing units. For example, within the Waterman Gardens public housing revitalization project, single-fund flexibility is utilized to increase RAD contract rents to match local market rent levels, thereby allowing us to generate more private debt and equity necessary for new construction.

Describe the Activities that Will Use Only MTW Single Fund Flexibility
<p>1) HACSB's Local FSS Activity is funded using single-fund flexibility with savings achieved through other MTW activities.</p> <p>2) HACSB's Career Development Initiatives (CDI) department and its services, which are not a separate MTW activity, are also funded using single-fund flexibility.</p> <p>3) In 2017 HACSB began implementing a post-assistance information gathering system for the Term-Limited Lease Assistance Program (Activity 20), including a financial incentive for participation, which will use single-fund flexibility to fund the incentive.</p>

B. MTW Plan: Local Asset Management Plan

B. MTW Plan: Local Asset Management Plan	
Is the PHA allocating costs within statute?	<input type="checkbox"/> or <input checked="" type="checkbox"/> No
Is the PHA implementing a local asset management plan (LAMP)?	<input checked="" type="checkbox"/> Yes or <input type="checkbox"/>
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>	
Has the PHA provided a LAMP in the appendix?	<input checked="" type="checkbox"/> Yes or <input type="checkbox"/>
<p style="text-align: center;">Please see Appendix E.</p>	

Section VI: Administrative

- A. **Resolution of the Board of Commissioners** –The resolutions of the Housing Commission and Board of Governors adopting this Annual MTW Plan along with the Certificate of Compliance prescribed by HUD in Exhibit B of the MTW agreement are attached in Appendix A to this Plan.

- B. **Planned Ongoing Evaluation of the Demonstration** – As part of the submission of this plan, HACSB does not have any planned or ongoing Agency directed evaluations of the MTW demonstration.

Exhibit 1: RAD Conversion Plan (Waterman Gardens)

The Housing Authority of the County of San Bernardino (HACSB) is including this information in its Annual MTW Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD) program for the full conversion of HACSB's public housing portfolio to units assisted by either Project Based Rental Assistance or Project Based Vouchers, both of which are commonly referred to as "Section 8" units.

Conversion to Project Based Rental Assistance or Project Based Vouchers

Any public housing units converting to assistance under RAD long-term Project Based Rental Assistance or Project Based Voucher contracts shall no longer be subject to the program rules applicable to public housing. The formerly public housing units which become Section 8 units will be subject to the rules of the applicable Section 8 program, as modified by a few rules specific to RAD converted units. These specific RAD-related rules are intended to apply a few important provisions of the public housing rules to the RAD converted units, even though they would not normally be applicable in the Section 8 context.

HACSB currently anticipates converting all public housing units in its portfolio to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers, HACSB will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32, REV-1 to be applicable to the Project Based Voucher units. These resident rights, participation, waiting list and grievance procedures are appended to this amendment at Attachment 1. With respect to the Waterman Gardens RAD conversion, the units will be operated consistent with operating policies to be developed in consultation with the agency's developer partner and the Waterman Gardens residents' association subject to applicable regulatory requirements. All other units converted to Project Based Vouchers under the RAD program will be operated consistent with HACSB's Project Based Voucher program rules referenced in this annual plan to the extent not specifically required to operate in a different manner by the regulatory and statutory requirements of the RAD Project Based Voucher program referenced above.

During the course of the conversion implementation, the agency will make a final determination regarding whether to convert to Project Based Rental Assistance or Project Based Vouchers. These determinations will be made on a site-by-site basis. A summary of variances between RAD Units and typical Project Based Rental Assistance units and Project Based Voucher units is appended to this amendment at Attachment 2.

Compliance with Fair Housing and Civil Rights Requirements

HACSB is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Implications of RAD Conversion on the Capital Fund Budget

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HACSB with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACSB may also borrow funds to address their capital needs. HACSB currently has debt under an Energy Performance Contract and will be working with City Capital to address outstanding debt issues, which may result in additional reductions of capital or operating funds.

The Waterman Gardens pro rata share of the Capital Fund budget is currently \$666,072 which will be removed from the Capital Fund budget gradually as the phases of the Waterman Gardens RAD conversion are implemented. HACSB anticipates that this will have a minimal effect on the capital investment plans at other properties.

In the event that the RAD applications currently pending and not yet approved are awarded to HACSB, HACSB anticipates the conversion of its entire inventory of public housing units under RAD over the course of the next few years, in which event the Capital Fund Program will be reduced to zero.

Regardless of any funding changes that may occur as a result of conversion under RAD, HACSB certifies that it will maintain its continued service level.

Please find specific information related to the Public Housing Development(s) selected for RAD appended to this amendment at Attachment 3.

Resident Rights, Participation, Waiting List and Grievance Procedures

Additional detail regarding resident rights, participation, waiting list and grievance procedures in connection with the post-conversion Project Based Voucher units is appended to this amendment at Attachment 1.

Site Selection and Neighborhood Standards Review

HACSB anticipates that up to 148 of the Waterman Gardens units will be subject to a transfer of assistance from the Waterman Gardens site to new sites immediately adjacent to the current Waterman Gardens site, resulting in an expansion of the Waterman Gardens site. The following provides some preliminary information with respect to the site selection and neighborhood standards review:

- The currently proposed new sites are immediately adjacent to the Waterman Gardens site, served by all of the same commercial and community amenities. The new site is consistent with the goals of deconcentrating poverty as all of the transferring RAD units are already located in the immediate neighborhood of the new site and the transfer of assistance permits the introduction of a mixed-income community which will have the effect of deconcentrating poverty.

- The transfer of assistance to the new sites adjacent to the original Waterman Gardens site is consistent with the goal of deconcentrating poverty as it is part of a revitalization plan for the Waterman Gardens site and will result in a mixed-income community across the entirety of the new, expanded, Waterman Gardens site. In addition, HACSB anticipates applying for and hopes to secure a Choice Neighborhoods Initiative grant, in which case the new sites will be part of a future Choice Neighborhood Initiatives development.
- The transfer of assistance is part of an overall redevelopment strategy for the revitalization of the Waterman Gardens area.

Detailed information regarding the site selection and neighborhood review standards will be submitted to HUD separately from the submission of this annual plan amendment and will be submitted no later than submission of the RAD Financing Plan. Only a portion of the units – currently anticipated to be approximately 148 – will be transferred to the adjacent sites. The following is a summary of key information about the transfer of assistance:

Destination location	Census Tract 64.01, San Bernardino County, CA (Same as current Waterman Gardens census tract)
Number of units to be transferred	Up to 148. 76 in the first phase and 72 in the second phase.
Bedroom distribution of units in the new buildings	10 1-bedrooms, 84 2-bedrooms, 50 3-bedrooms, and 4 4-bedrooms (Same as current Waterman Gardens distribution)
Type of units	Family (Same as the current Waterman Gardens type)
Any reduction or change in the number of units	None
How the waiting list will be transferred and how households will be selected for the transfer	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto HACSB’s existing PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.

If the pending RAD applications are successful, other properties would convert under RAD but HACSB currently does not anticipate that any of these other properties would be subject to a transfer of assistance. In the event these plans change, HACSB will submit site selection and neighborhood review information to HUD at that time.

Relocation Plans

The relocation plans have not yet been finalized for any of the RAD conversion transactions. All current public housing residents will have the right to return to a RAD assisted unit after RAD conversion in the event that relocation is required. By using the adjacent site parcels, HACSB and its developer partner hope to complete construction of the first phase of the Waterman Gardens replacement units before residents are required to relocate from their current units, permitting single-move relocation as much as possible in the early phases of the revitalization effort.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), HACSB is redefining the definition of a substantial deviation from the agency's annual plan to exclude the following RAD-specific items, provided that the adjustments to the RAD plans are authorized by the Board of Commissioners in the normal course of business:

- Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion;
- The decision to convert to either Project Based Rental Assistance or Project Based Vouchers, such that properties currently identified to convert to Project Based Vouchers may convert to Project Based Rental Assistance and properties currently identified to convert to Project Based Rental Assistance may convert to Project Based Vouchers;
- The date the significant amendment is submitted to the PHA Plan website;
- Changes in the number of de minimis units up to the 5% figure permitted by the RAD program rules;
- Decisions to dedicate a portion of the agency's existing capital funds budget and/or public housing reserves as a source of funds for purposes of a RAD conversion and recapitalization transaction; and
- Detailed development of the plans for the transfer of waiting lists to post-RAD conversion waiting lists.

Attachment 1
Resident Rights, Participation, Waiting List and Grievance Procedures
Applicable to Properties Converting to Project Based Vouchers

Excerpts of PIH Notice 2012-32: Sections 1.6.C and 1.6.D

C. PBV Resident Rights and Participation

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- 2. Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.
- 3. Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.
- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
 - Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
 - Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP
- Five Year Phase in:
- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
 - Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
 - Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
 - Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
 - Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC)

programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

- 6. Resident Participation and Funding.** In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
- 7. Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the owner’s lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
- a. Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
- i.** A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii.** 14 days in the case of nonpayment of rent; and
 - iii.** 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- b. Grievance Process.** HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:
- i.** In addition to reasons that require an opportunity for an informal hearing given in 24 CFR §982.555(a)(1)(i)-(vi),¹ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

¹ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

- 8. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.,) is covered by this waiver.

- 9. Capital Fund Education and Training Community Facilities (CFCF) Program.**

CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. **Additional Monitoring Requirement.** The PHA's Board must approve the operating budget for the covered project annually in accordance with HUD requirements.¹

¹For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.¹

4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA’s policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency’s centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).²

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

¹ Applicable to projects with nine or more units.

² For more information on serving persons with LEP, please see HUD’s Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.
6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)
8. **Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time. Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units. After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Attachment 2

List of RAD Program Elements Affecting Resident Rights and Participation Waiting List and Grievance Procedures for PBV and PBRA (Variances Between RAD Units and Typical PBV or PBRA Units)

Project Based Voucher Requirements (Section 1.6.C of PIH Notice 2012-32)	Project Based Rental Assistance Requirements (Section 1.7.D of PIH Notice 2012-32)
1. No re-screening of tenants upon conversion;	1. No re-screening of tenants upon conversion;
2. Resident right to return if relocated as a result of conversion;	2. Resident right to return if relocated as a result of conversion;
3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA;	3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA;
4. Continued eligibility for PH-FSS and ROSS-SC programs;	4. Continued eligibility for PH-FSS and ROSS-SC programs;
5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032.	5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032.
6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ul style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. 30 days in any other case unless State or local law provide for a shorter time period. 	6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ul style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. in all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply;
7. Grievance process - See PIH Notice 2012-32 Section 1.6.C.7	7. Grievance process - See PIH Notice 2012-32 Section 1.7.B.6
8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.6D	8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.7.C
9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.6.C.8.)	9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.7.B.7.)
10. Resident Participation and Funding - See PIH Notice 2012-32 Attachment 1B.2	N/A
11. Renewal of Lease - PHA's are required to renew the lease at expiration unless good cause exists for non-renewal.	N/A

Attachment 3 Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Waterman Gardens
PIC Development ID #	CA019000120
Conversion Type	PBRA (tentative)
Total Current Units	252
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	24 One-Bedroom Units 134 Two-Bedroom Units 62 Three-Bedroom Units 12 Four-Bedroom Units 14 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	Up to 148 units, to immediately adjacent sites, with detailed information regarding the proposed sites to be submitted to HUD prior to submission of the RAD financing plan
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto HACSB’s existing PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP’s have closed on 105 units that have converted to Project Based Vouchers. The remainder of the units in the portfolio application are expected to convert during Fiscal Year Ending 2018.

Exhibit 2: RAD Conversion Plan (Remaining Portfolio)

The Housing Authority of the County of San Bernardino (HACSB) is including this information in its Annual MTW Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD) program with respect to its entire Public Housing portfolio and because this will result in the full conversion of HACSB's Public Housing portfolio to units assisted by either Project Based Rental Assistance or Project Based Vouchers, both of which are commonly referred to as "Section 8" units.

Conversion to Project Based Rental Assistance or Project Based Vouchers

Any public housing units converting to assistance under RAD long-term Project Based Rental Assistance or Project Based Voucher contracts shall no longer be subject to the program rules applicable to public housing. The formerly public housing units which become Section 8 units will be subject to the rules of the applicable Section 8 program, as modified by a few rules specific to RAD converted units. These specific RAD-related rules are intended to apply a few important provisions of the public housing rules to the RAD converted units, even though they would not normally be applicable in the Section 8 context.

HACSB currently anticipates converting all public housing units in its portfolio to Project Based Vouchers under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Vouchers, HACSB will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32, REV-1 to be applicable to the Project Based Voucher units. These resident rights, participation, waiting list and grievance procedures are appended to this amendment at Attachment 1. With respect to the Portfolio RAD conversion, the units will be operated consistent with operating policies of HACSB and the all the sites' residents' associations subject to applicable regulatory requirements. All units converted to Project Based Vouchers under the RAD program will be operated consistent with HACSB's Project Based Voucher program rules referenced in this annual plan to the extent not specifically required to operate in a different manner by the regulatory and statutory requirements of the RAD Project Based Voucher program referenced above.

During the course of the conversion implementation, the agency will make a final determination regarding whether to convert to Project Based Rental Assistance or Project Based Vouchers. These determinations will be made on a site-by-site basis. A summary of variances between RAD Units and typical Project Based Rental Assistance units and Project Based Voucher units is appended to this amendment at Attachment 2.

Compliance with Fair Housing and Civil Rights Requirements

HACSB is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

Implications of RAD Conversion on the Capital Fund Budget

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HACSB with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that HACSB may also borrow funds to address their capital needs. HACSB currently has debt under an Energy Performance Contract and will be working with Bank of America to address outstanding debt issues, which may result in additional reductions of capital or operating funds.

In the event that the RAD applications currently pending and not yet approved are awarded to HACSB, HACSB anticipates the conversion of its entire inventory of public housing units under RAD over the course of the next few years, in which event the Capital Fund Program will be reduced to zero.

Regardless of any funding changes that may occur as a result of conversion under RAD, HACSB certifies that it will maintain its continued service level.

Please find specific information related to the Public Housing Development(s) selected for RAD appended to this amendment at Attachment 3.

Resident Rights, Participation, Waiting List and Grievance Procedures

Additional detail regarding resident rights, participation, waiting list and grievance procedures in connection with the post-conversion Project Based Voucher units is appended to this amendment at Attachment 1.

Site Selection and Neighborhood Standards Review

TBD (Not Applicable at this time)

Relocation Plans

The relocation plans have not yet been finalized for any of the RAD conversion transactions. All current public housing residents will have the right to return to a RAD assisted unit after RAD conversion in the event that relocation is required.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), HACSB is redefining the definition of a substantial deviation from the agency's annual plan to exclude the following RAD-specific items, provided that the adjustments to the RAD plans are authorized by the Board of Commissioners in the normal course of business:

- Changes to the Capital Fund Budget produced as a result of each approved RAD conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion;
- The decision to convert to either Project Based Rental Assistance or Project Based Vouchers, such that properties currently identified to convert to Project Based Vouchers may convert to Project Based Rental Assistance and properties currently identified to convert to Project Based Rental Assistance may convert to Project Based Vouchers;
- The date the significant amendment is submitted to the PHA Plan website;
- Changes in the number of de minimis units up to the 5% figure permitted by the RAD program rules;
- Decisions to dedicate a portion of the agency's existing capital funds budget and/or public housing reserves as a source of funds for purposes of a RAD conversion and recapitalization transaction; and
- Detailed development of the plans for the transfer of waiting lists to post-RAD conversion waiting lists.

Attachment 1
Resident Rights, Participation, Waiting List and Grievance Procedures
Applicable to Properties Converting to Project Based Vouchers
Excerpts of PIH Notice 2012-32: Sections 1.6.C and 1.6.D

C. PBV Resident Rights and Participation

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- 2. Right to Return.** Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner’s offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.
- 3. Renewal of Lease.** Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.
- 4. Phase-in of Tenant Rent Increases.** If a tenant’s monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of “total tenant payment” (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that

uses a three year phase-in for smaller increases in rent and a five year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP
 - Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
 - Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP
- Five Year Phase in:
- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP and the standard TTP
 - Year 2: Year 2 AR and any IR prior to Year 3 AR – 40% of difference between most recently paid TTP and the standard TTP
 - Year 3: Year 3 AR and any IR prior to Year 4 AR – 60% of difference between most recently paid TTP and the standard TTP
 - Year 4: Year 4 AR and any IR prior to Year 5 AR – 80% of difference between most recently paid TTP and the standard TTP
 - Year 5 AR and all subsequent recertifications – Full standard TTP

Please Note: In either the three year phase-in or the five-year phase-in, once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. **Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to

their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.

All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants' contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. **Resident Participation and Funding.** In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.
7. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.
 - a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the

premises is threatened; or

- In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. 14 days in the case of nonpayment of rent; and
- iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act.

For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR §982.555(a)(1)(i)-(vi),¹ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
 - For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provides opportunity for an informal hearing before an eviction.

¹ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate has been repealed.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.,) is covered by this waiver.

9. **Capital Fund Education and Training Community Facilities (CFCF) Program.**

CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as "PHA residents" for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.

2. **Additional Monitoring Requirement.** The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.¹
3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.²
4. **Establishment of Waiting List.** In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA’s policies for waiting list management, including the obligation to affirmatively further fair housing.

¹For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of the evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

²Applicable to projects with nine or more units.

A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁴

To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.
6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

⁴ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

8. Administrative Fees for Public Housing Conversions. For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Attachment 2

List of RAD Program Elements Affecting Resident Rights and Participation Waiting List and Grievance Procedures for PBV and PBRA (Variances Between RAD Units and Typical PBV or PBRA Units)

Project Based Voucher Requirements (Section 1.6.C of PIH Notice 2012-32)	Project Based Rental Assistance Requirements (Section 1.7.D of PIH Notice 2012-32)
<ol style="list-style-type: none"> 1. No re-screening of tenants upon conversion; 2. Resident right to return if relocated as a result of conversion; 3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA; 4. Continued eligibility for PH-FSS and ROSS-SC programs; 5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032. 6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ol style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. 30 days in any other case unless State or local law provide for a shorter time period. 7. Grievance process - See PIH Notice 2012-32 Section 1.6.C.7 8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.6D 9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.6.C.8.) 10. Resident Participation and Funding - See PIH Notice 2012-32 Attachment 1B.2 11. Renewal of Lease - PHA's are required to renew the lease at expiration unless good cause exists for non-renewal. 	<ol style="list-style-type: none"> 1. No re-screening of tenants upon conversion; 2. Resident right to return if relocated as a result of conversion; 3. Phase-in of tenant rent increase: If the rent increase is the greater of 10% or \$25, the increase will be phased in over 3 years or up to five years, as determined by the PHA; 4. Continued eligibility for PH-FSS and ROSS-SC programs; 5. Resident Participation and Funding. Residents will have the right to establish and operate a resident organization and be eligible for resident participation funding. See Attachment 1B of PIH Notice 2012-032. 6. Termination notification: PHA must provide written notification of termination of lease within a reasonable time: <ol style="list-style-type: none"> i. not to exceed 30 days if health or safety of other tenants, PHA employees or persons residing in the vicinity are threatened or in the event of drug-related or violent criminal activity or any felony conviction; ii. 14 days for non-payment of rent; iii. in all other cases, the requirements at 24 CFR §880.603, as revised for RAD in PIH Notice 2012-32, the Multifamily HUD Model Lease and any other HUD multifamily administrative guidance shall apply; 7. Grievance process - See PIH Notice 2012-32 Section 1.7.B.6 8. Establishment of Waiting List - See PIH Notice 2012-32 Section 1.7.C 9. Earned Income Disregard – Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR §960.255. If a tenant requests that the EID cease, or upon the expiration of the EID for such tenants, the tenant will no longer receive the EID exclusion and the Owner will no longer be subject to the provisions of 24 CFR §960.255. Furthermore, tenants whose EID ceases or expires after conversion shall not be subject to the rent phase-in provision, as described in Section 1.7.B.3; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. (Please see PIH Notice 2012-32, Section 1.7.B.7.) N/A N/A

Attachment 3 Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Waterman Gardens – Scattered Sites
PIC Development ID #	CA019000120
Conversion Type	PBV (Tentative)
Total Current Units	97
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	27 One-Bedroom Units 32 Two-Bedroom Units 28 Three-Bedroom Units 10 Four-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP has been closed and the RAD conversion of these units occurred in Fiscal Year Ending 2016.

Attachment 3 (continued) Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Maplewood Homes (Wilson Street)
PIC Development ID #	CA019000130
Conversion Type	PBV (Tentative)
Total Current Units	330
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	34 One-Bedroom Units 126 Two-Bedroom Units 116 Three-Bedroom Units 48 Four-Bedroom Units 6 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP has been closed and the RAD conversion of these units occurred in Fiscal Year Ending 2016.

Attachment 3 (continued)
Specific Information Related to the
Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Scattered Sites (Brockton)
PIC Development ID #	CA019000150
Conversion Type	PBV (Tentative)
Total Current Units	75
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	10 One-Bedroom Units 26 Two-Bedroom Units 26 Three-Bedroom Units 10 Four-Bedroom Units 3 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP has been closed and the RAD conversion of these units occurred in Fiscal Year Ending 2016.

Attachment 3 (continued) Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Scattered Sites (East 9 th Street)
PIC Development ID #	CA019000150
Conversion Type	PBV (Tentative)
Total Current Units	12
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	12 Two-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB's public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP pending, approved under portfolio application approval

Attachment 3 (continued)
Specific Information Related to the
Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Scattered Sites (Chino)
PIC Development ID #	CA019000160
Conversion Type	PBV (Tentative)
Total Current Units	50
Pre-RAD Unit Type	Family
Post-RAD Unit Type	Family
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	8 One-Bedroom Units 18 Two-Bedroom Units 16 Three-Bedroom Units 6 Four-Bedroom Units 2 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP has been closed and the RAD conversion of these units occurred in Fiscal Year Ending 2016.

Attachment 3 (continued) Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Scattered Sites (Pine Street - Colton)
PIC Development ID #	CA019000160
Conversion Type	PBV (Tentative)
Total Current Units	125
Pre-RAD Unit Type	Family/Senior
Post-RAD Unit Type	Family/Senior
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	4 Zero-Bedroom Units 42 One-Bedroom Units 32 Two-Bedroom Units 34 Three-Bedroom Units 10 Four-Bedroom Units 3 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB's public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP pending, approved under portfolio application approval

Attachment 3 (continued) Specific Information Related to the Public Housing Developments Selected for RAD

Currently Approved RAD Application:

Development Name	Bighorn Complex (Barstow)
PIC Development ID #	CA019000170
Conversion Type	PBV (Tentative)
Total Current Units	217
Pre-RAD Unit Type	Family/Senior
Post-RAD Unit Type	Family/Senior
Capital Fund Grant to Project	TBD - \$0 at this time
Pre-Conversion Bedroom Type	59 One-Bedroom Units 58 Two-Bedroom Units 61 Three-Bedroom Units 26 Four-Bedroom Units 13 Five-Bedroom Units
Post-Conversion Bedroom Type	HACSB anticipates the same distribution post-conversion
Transfer of Assistance	None anticipated.
De Minimis Reduction	None currently projected
Unit Reconfiguration	None currently projected
Transfer of Waiting List	Upon conversion to RAD, applicants on HACSB’s public housing waiting list will be moved onto a HACSB site based PBV waiting list. The applicants will retain their original date and time of application, and will be subject to the preferences available under the PBV waiting list.
Other Information	CHAP pending, approved under portfolio application approval

Appendix A: Board Resolution

The following documents are attached:

1. Housing Commission resolution recommending approval of the FY 2018 Annual Moving to Work Plan
2. Board of Governors resolution approving the FY 2018 Annual Moving to Work Plan

RESOLUTION NO. 36

A RESOLUTION OF THE HOUSING COMMISSION OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO ADOPTING THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO'S 2017-18 MOVING TO WORK ANNUAL PLAN

WHEREAS, the HACSB entered into a Moving to Work (MTW) contract with HUD effective March 14, 2008, which governs the regulations of the administration of the Housing Choice Voucher and Public Housing programs; and

WHEREAS, as a MTW agency the HACSB is required to and has prepared an Annual MTW Plan which describes its operations and activities as an MTW agency; and

WHEREAS, the HACSB desires to implement changes to existing MTW activities; and

WHEREAS, the HACSB has developed its Fiscal Year 2017-18 Annual MTW Plan to include the proposed changes to existing activities;

NOW, THEREFORE, THE HOUSING COMMISSION OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO DOES RESOLVE AS FOLLOWS:

Section 1. The Housing Commission finds that all of the facts set forth in the Recitals are true and correct, and are incorporated herein by reference.

Section 2. The Housing Commission hereby approves the proposed Fiscal Year 2017-18 HACSB Annual MTW Plan, a copy of which is attached hereto and incorporated by reference herein.

Section 3. This resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the Housing Commission of the Housing Authority of the County of San Bernardino, by the following vote:

AYES: Commissioner Johnson, Miller, Cooper, Munoz and Saucedo

NOES:

ABSENT: Commissioner Yule

STATE OF CALIFORNIA)
)
COUNTY OF SAN BERNARDINO) ss.

By Mania Roro

Date _____

HOUSING AUTHORITY RESOLUTION NO. 2017-114

A RESOLUTION OF THE BOARD OF GOVERNORS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO ADOPTING THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO'S 2017-18 MOVING TO WORK ANNUAL PLAN

On Tuesday, June 27, 2017, on motion of Governor Gonzales, duly seconded by Governor Hagman and carried, the following resolution is adopted by the Board of Governors of the Housing Authority of the County of San Bernardino.

WHEREAS, HACSB entered into a Moving to Work (MTW) contract with HUD effective March 14, 2008, which governs the regulations of the administration of the Housing Choice Voucher and Public Housing programs; and

WHEREAS, as an MTW agency HACSB is required to and has prepared an Annual MTW Plan which describes its operations and activities as an MTW agency; and

WHEREAS, HACSB desires to implement changes to existing MTW activities; and

WHEREAS, HACSB has developed its Fiscal Year 2017-18 Annual MTW Plan to include the proposed changes to existing activities;

NOW, THEREFORE, THE BOARD OF GOVERNORS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO DOES RESOLVE AS FOLLOWS:

Section 1. The Board of Governors finds that all of the facts set forth in the Recitals are true and correct, and are incorporated herein by reference.

Section 2. The Board of Governors hereby approves the proposed Fiscal Year 2017-18 HACSB Annual MTW Plan, a copy of which is attached hereto as Exhibit "A" and incorporated by reference herein.

Section 3. This resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the Board of Governors of the Housing Authority of the County of San Bernardino, by the following vote:

AYES: GOVERNOR: Robert A. Lovingood, Janice Rutherford, Curt Hagman
Josie Gonzales

NOES: GOVERNOR: None

ABSENT: GOVERNOR: James Ramos

* * * * *

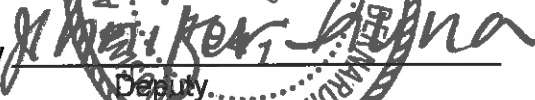
STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN BERNARDINO)

I, LAURA H. WELCH, Secretary of the Board of Governors of the Housing Authority of the County of San Bernardino, hereby certify the foregoing to be a full, true and correct copy of the record

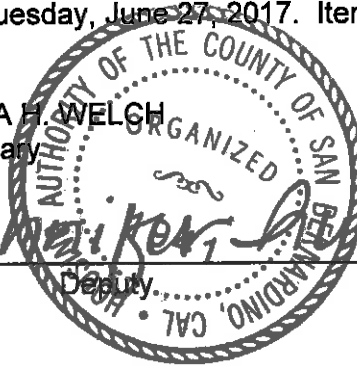
of the action taken by the Board of Governors, by vote of the members present, as the same appears in the Official Minutes of said Board at its meeting of Tuesday, June 27, 2017. Item #62 jll

LAURA H. WELCH
Secretary

By



Deputy



Form 50900: Elements for the Annual MTW Plan and Annual MTW Report

Attachment B

Certifications of Compliance

Annual Moving to Work Plan
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 Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning 10/01/2017, 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 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 PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The 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 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.
4. The 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 PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The 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.
10. The 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.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The 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.

13. The 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The 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 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.
16. With respect to public housing the 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The 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 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The 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.
21. 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 PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the County of San Bernardino

CA019

PHA Name

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)

Robert A. Lovinggood

Chairman, Board of Governors

Name of Authorized Official

Title

Signature

Date



JUN 27 2017

*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the 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: Public Process

The following steps have been taken by HACSB to ensure a thorough public process in the development and adoption of the FY 2018 Annual MTW Plan:

April 13, 2017	Public notices published in local newspapers - San Bernardino County Sun, Black Voice, El Chicano, Inland Valley Daily Bulletin, Precinct Reporter, Daily Press, and The Press Enterprise, announcing the public hearing. Text of Public Hearing notice included in Appendix B.
April 14, 2017	Plan posted on HACSB website; Public comment period opened. Plan available at all HACSB offices throughout the county.
May 2, 2017, and May 3, 2017	Public Hearings held. Minutes included in Appendix B.
May 12, 2017	Plan presented to Resident Advisory Board (RAB). Comments included in Appendix B.
May 15, 2017	Public comment period closed.
June 7, 2017	Plan presented to HACSB Housing Commission for recommendation for approval by HACSB Board of Governors. Resolution included in Appendix A.
June 27, 2017	Plan presented for approval by HACSB Board of Governors. Resolution included in Appendix A.

NOTICE OF PUBLIC HEARING

On March 14, 2008, the U.S. Department of Housing and Urban Development (HUD) executed a ten-year Moving to Work (MTW) Agreement with the Housing Authority of the County of San Bernardino (HACSB) and in April 2016 that agreement was extended through 2028. As an MTW agency, HACSB is provided with more flexibility and authorization to develop policies that are outside the limitations of certain HUD regulations in order to more successfully achieve its mission and program goals, and to enhance its ability to serve the needs of low-income families in San Bernardino County.

In continuing to develop its MTW program and address community and client needs, HACSB has prepared its Fiscal Year (FY) 2017-18 Annual MTW Plan. The Plan will be made available to the public for review for 30 days starting Friday, April 14, 2017, at the following location:

Housing Authority of the
County of San Bernardino
715 E. Brier Drive
San Bernardino, CA 92408

The Plan is available on HACSB's website at www.hacsb.com under the "MTW Plans, Reports, and Factsheets" section and at any HACSB satellite office.

Notice is hereby given that HACSB will conduct a public hearing regarding the proposed Plan on Tuesday, May 2, 2017 at 10:00 a.m. and Wednesday, May 3, 2017, at 2:00 p.m. at 715 E. Brier Drive, San Bernardino, CA 92408. If a citizen wishes to challenge the nature of the above action(s) in court he/she may be limited to raising only those issues he/she or someone else raised at the public hearing described in this notice, or in written correspondence delivered Monday through Friday to the HACSB office located at 715 E. Brier Drive, San Bernardino, CA 92408 prior to the hearing.

In accordance with the Rehabilitation Act of 1973, HACSB will make reasonable efforts to accommodate persons with disabilities. Please call (909) 890-0644 at least three days in advance if you require special accommodations.

HACSB offers language assistance free of charge. For assistance with this document, please contact our office at (909) 890-0644.

HACSB ofrece asistencia idiomática gratis. Para ayuda con este documento, por favor llámenos al (909) 890-0644.

Equal Housing Opportunity.

HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO
PUBLIC HEARINGS
MAY 2, 2017, AND MAY 3, 2017

The Housing Authority of the County of San Bernardino (HACSB), California held public hearings for the Fiscal Year 2017-2018 Annual Moving to Work (MTW) Plan, at the Housing Authority's Administration Office at 715 East Brier Drive, San Bernardino, CA 92408 on Tuesday, May 2, 2017, at 10:00 a.m. and Wednesday May 3, 2017, at 2:00 p.m.

Housing Authority Attendees:

Nicole Beydler, Senior Management Analyst

Renee Kangas, Management Analyst

Other Attendees:

None.

I. Purpose of the Public Hearing

The purpose of the hearing was to provide interested parties with an opportunity to present questions and/or comments regarding the Housing Authority of the County of San Bernardino's Fiscal Year 2017-2018 Annual Moving to Work Plan before submission to the Housing Authority's Housing Commission, Board of Governors, and HUD for approval.

The proposed Plan was made available for public viewing for 30 days beginning April 14, 2017. The plan was advertised in seven local newspapers, on the HACSB website, and copies were available at all HACSB offices located throughout the county.

II. Call for Public Comments

Tuesday May 2, 2017, the public hearing convened at 10:00 a.m., with Nicole Beydler, Senior Management Analyst, and Renee Kangas, Management Analyst, presiding. Copies of the Plan were made available for review. No members of the public attended and no public comments were received. The public hearing ended at 10: 20 a.m.

On Wednesday May 3, 2017 the public hearing convened at 2:00 p.m., with Ana Gamiz, Director of Policy and Public Relations, and Renee Kangas, Management Analyst, presiding. Copies of the Plan were made available for review. No members of the public attended and no public comments were received. The public hearing ended at 2:20 p.m.

**HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO
RESIDENT ADVISORY COUNCIL BOARD MEETING
MAY 12, 2017**

The Resident Advisory Council Board was presented with a summary of the proposed FY 2017-2018 Annual Moving to Work Plan, including the proposed modifications to Local Project-Based Voucher, Term-limited Assistance, Streamlined Lease Assistance, and No Child Left Unsheltered programs at their regular meeting on Friday, May 12, 2017. A list of attendees and their comments follows.

List of Attendees:

Resident Advisory Board Members:

1. Roxanne Chiappone
2. Cassie Ford
3. Brigita Miller

Guests:

1. Marchaina Greely
2. Valerie Bennett
3. Michael Bailey
4. Ruth Perez
5. Edward Amaya

HACSB Staff:

1. Marcia Waggoner
2. Darlene McIntosh
3. Renee Kangas

Summary of Proposed 2017-2018 Annual MTW Plan

A presentation explaining the Moving to Work program, annual plan process, and details of the proposed change to the FY 2017-2018 MTW Plan to include proposed modifications to approved MTW activities was made by Renee Kangas, Management Analyst, at the meeting. Renee Kangas also explained how feedback from the Resident Advisory Board and the public would be incorporated into the final Plan submitted to HUD for approval.

Comments

The Resident Advisory Board expressed their approval of the MTW Plan. The following questions and comments were made by the RAB and HACSB staff present at the meeting:

- A guest at the RAB meeting asked how the proposed unit size limitation for the Term-Limited Assistance and Streamlined Lease Assistance programs would work if she was issued a 1-bedroom voucher for her and her adult son. She stated that they would be short a bedroom. Renee Kangas explained that the new requirement would align with HACSB's current occupancy policy for vouchers, which allows one bedroom per two persons. In accordance with program regulations, the family may choose to use the living room as a sleeping room.

**Housing Authority of the County of San Bernardino
Capital Fund Program- Five Year Plan & Budget (2016-2020)**

Note: This document reflects the Capital Fund Annual Statement from FY 2017. This information will change based upon funding under the Rental Assistance Demonstration (RAD) program, which will not be known to HACSB until at least late April, 2017.

AMP 202					
Development	City	Units	Budget	Plan Year	Activities
Waterman Gardens	San Bernardino	252	762,000	2016	Redevelopment Activity (phase 1)
Waterman Gardens	San Bernardino	252	500,000	2017	Redevelopment Activity
Waterman Gardens	San Bernardino	252	500,000	2018	Redevelopment Activity
Waterman Gardens	San Bernardino	252	500,000	2019	Redevelopment Activity
Waterman Gardens	San Bernardino	252	500,000	2020	Redevelopment Activity

* note: balance of units in AMP 202 have completed RAD conversion as of 4/2016

Total- AMP 202

2,762,000

AMP 203					
Development	City	Units	Budget	Plan Year	Activities

* note: balance of units in AMP 203 have completed RAD conversion as of 4/2016

Total- AMP 203

-

AMP 205					
Development	City	Units	Budget	Plan Year	Activities
Cal 19-32 - E. 9th St.	Redlands	12	60,000	2016	Misc. dwelling Improvements
Redlands - Lugonia Site	Redlands	115	200,000	2016	Redevelopment Activities (demolition)
Redlands - Lugonia Site	Redlands	115	500,000	2017	Redevelopment Activities

**Housing Authority of the County of San Bernardino
Capital Fund Program- Five Year Plan & Budget (2016-2020)**

Redlands - Lugonia Site	Redlands	115	500,000	2018	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	500,000	2019	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	500,000	2020	Redevelopment Activities

* note: balance of units in AMP 205 have completed RAD conversion as of 4/2016

Total- AMP 205

2,260,000

AMP 206					
Development	City	Units	Budget	Plan Year	Activities
Cal 19-10 - Colton	Colton	40	15,000	2016	Site Improvements
Cal 19-04 - Colton	Colton	85	85,000	2016	Site Improvements

* note: balance of units in AMP 206 have completed RAD conversion as of 4/2016

Total- AMP 206

100,000

AMP 207					
Development	City	Units	Budget	Plan Year	Activities
Cal 19-07, 12 - Barstow	Barstow	114	128,339	2016	Misc. Dwelling Improvements
Cal 19-13, 34 - Barstow	Barstow	104	149,705	2017	Misc. Dwelling Improvements
Cal 19-07, 12 - Barstow	Barstow	114	100,634	2017	Misc. Dwelling Improvements
Cal 19-13, 34 - Barstow	Barstow	104	107,505	2018	Misc. Dwelling Improvements
Cal 19-07, 12 - Barstow	Barstow	114	142,834	2018	Misc. Dwelling Improvements
Cal 19-07, 12 - Barstow	Barstow	114	125,834	2019	Site Improvements
Cal 19-13, 34 - Barstow	Barstow	104	124,505	2019	Site Improvements
Cal 19-07, 12 - Barstow	Barstow	114	112,839	2020	Misc. Dwelling Improvements
Cal 19-13, 34 - Barstow	Barstow	104	137,500	2020	Misc. Dwelling Improvements

Total- AMP 207

1,129,695

**Housing Authority of the County of San Bernardino
Capital Fund Program- Five Year Plan & Budget (2016-2020)**

AMP 208					
Development	City	Units	Budget	Plan Year	Activities
Cal 19-32, 19-42	High Desert	6	-		Section 32 homes being sold
Total- AMP 208			<u>-</u>		

AGENCY WIDE					
Development Account			Budget	Plan Year	Activities
Operations			0	2016-2020	Operations
Development Activities			584,100	2016-2020	Replacement Housing Factor
Management Improvements			370,000	2016-2020	Self Sufficiency Programs
Administration			306,049	2016-2020	10% limit
Fees & Costs			400,000	2016-2020	A&E/Consultants, Inspection Costs
Audit			0	2016-2020	Audit Program
Non-Dwelling Equipment			0	2016-2020	Misc equipment
Relocation Costs			150,000	2016-2020	Misc Relocation Costs
Debt Service Pledge			0	2016-2020	CFFP repaid w/ 501-11
Subtotal Annual Agency Wide Activities			1,810,149		
Total - Agency Wide		X5 years	<u>9,050,745</u>		
Grand Total- All AMP's			<u>15,302,440</u>		
Annual Allocation (including RHF)			3,060,488		

Part I: Summary						
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO		Grant Type and Number Capital Fund Program Grant No: CA16PO19501-17 Replacement Housing Factor Grant No: CA16PO195017 Date of CFFP:			FFY of Grant: 2017 FFY of Grant Approval: 2017	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report						
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹		
		Original	Revised ²	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations (may not exceed 20% of line 21) ³					
3	1408 Management Improvements					
4	1410 Administration (may not exceed 10% of line 21)					
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs					
8	1440 Site Acquisition					
9	1450 Site Improvement					
10	1460 Dwelling Structures					
11	1465.1 Dwelling Equipment—Nonexpendable					
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment					
14	1485 Demolition					
15	1492 Moving to Work Demonstration	1,982,321				
16	1495.1 Relocation Costs					
17	1499 Development Activities ⁴					

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO	Grant Type and Number Capital Fund Program Grant No: CA16PO19501-17 Replacement Housing Factor Grant No: CA16PO19501-17 CA16R01950116 Date of CFFP:	FFY of Grant:2017 FFY of Grant Approval: 2017			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,982,321			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part II: Supporting Pages								
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO			Grant Type and Number Capital Fund Program Grant No: CA16PO19501-17 CFFP (Yes/ No): No Replacement Housing Factor Grant No: CA16PO19501-17			Federal FFY of Grant: 2017		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
AMP 202								
Cal 19-2	Demolition	1492		699,205				
AMP 207								
CA 19-12, 34	Site Improvement – RAD Conversion	1492		121,897				
CA 19-12,13, 34	Building Improvements - RAD Conversion	1492		962,987				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages								
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO			Grant Type and Number Capital Fund Program Grant No: CA16PO19501-17 CFFP (Yes/ No): No Replacement Housing Factor Grant No: CA16PO19501-17			Federal FFY of Grant: 2017		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO				Federal FFY of Grant: 2017	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name:				Federal FFY of Grant:	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Appendix E: Local Asset Management Plan (LAMP)

The First Amendment to the Standard MTW agreement executed on May 21, 2009 allowed HACSB to design and implement a local asset management program. The program should include a description of how it is implementing property based management, budgeting, accounting and financial management and any deviations from HUD's asset management requirements. In our FY 2010 MTW Annual Plan, we first described our asset management program and amended it through our FY 2010 MTW Plan – Amendment 3 approved on September 15, 2010. Prior to our designation as an MTW agency, HACSB developed a comprehensive 30 year strategic plan in 2008 that serves as a guiding map in achieving our mission, vision and goals. Some of the goals of our plan include helping our participants achieve self-sufficiency, providing timely housing assistance to needy families, increasing housing options and strengthening our agency, our residents and our community. As good stewards of taxpayer's dollars, we pride ourselves in achieving administrative efficiency while providing the best quality service to the families that we serve. Upon closer examination, we feel that the indirect cost rate methodology will best serve our mission, versus our current fee-for-service methodology. In accordance with the federal Office of Management and Budget (OMB) Circular A-87, we elect to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. The cost allocation plan along with the indirect cost rate is described in detail below and we agree to justify the indirect cost rate established.

HACSB did a detailed examination of our current agency structure including our Central Office Cost Center (COCC) structure and confirmed how intertwined our Central Office was to the agency as a whole. The work done by various departments has resulted in agency wide solutions and it is our combined efforts that will help us achieve our goals. This strengthens the need for an indirect cost rate methodology that allows the flexibility to combine resources and achieve inter-department solutions that are represented as a simple unified solution for the families that we serve and our agency. We wish to keep the funding and administrative processes indistinguishable in the eyes of our customers and hope that our collective efforts at various levels provide the best services, the best support, and the best housing choices for our families. This has led to a centralized effort in many services like information technology, community affairs, administrative services, waiting list and development. Details on some of our departments are provided below.

Information Services (I.S.) – Our centralized I.S. department is responsible for the network and server administration, database and software administration, telecommunications and software and report developments for the entire agency. This is done with a dedicated team of four individuals that support 154 agency computers in 10 locations throughout our county. They respond to an

average of 50 help desk tickets a week that result in around 20 site visits per week. In addition, in February 2010, we were awarded the competitive BTOP grant to provide high speed technology access to underserved communities. Post grant ending, HACSB has continued to fund these centers, which currently consist of four (4) computer centers that are served by three (3) computer technicians and host 24 personal computers and 16 Apple Mac's. Our IS team provides the necessary technical support and manages the computer centers. Our agency partnered with the Career Institute to provide free career, education and job counseling services at these centers.

Community Affairs – Our centralized community affairs department assists in making and strengthening partnerships throughout the County to leverage services and programs to assist our residents in achieving self-sufficiency. These partners include schools, non-profit community organizations, health and human service providers, financial institutions, elected officials, and so forth. Through these efforts, our housing sites are able to sustain services such as child care, financial literacy courses, health services, parenting courses, to name a few examples.

In an effort to outreach to services of greatest need among our residents, in 2010, we partnered with Loma Linda University (LLU) to conduct a detailed needs assessment for one of our Public Housing communities- Maplewood Homes Community (formerly known as Medical Center, 296 units) to determine the appropriate partners that could serve our residents based on resident input and professional analysis. As a result, LLU staff and students will assist with follow up by providing on-site case work management and varying topic workshops in response to the assessment findings.

As monies from the federal government continue to deplete for resident services, HACSB was proactive in 2011 by establishing an affiliate nonprofit K.E.Y.S. (Knowledge Education for Your Success) to support resident and community initiatives and client self-sufficiency activities. The mission of KEYS is to empower low income families in San Bernardino County, to unlock their potential for success. Our efforts are not restricted to resident self-sufficiency, and KEYS is an example of the additional work that we have accomplished to improve the quality of life for our residents.

Specifically, in an effort to improve the quality of life for residents, HACSB acknowledged the serious health issues caused by second hand smoke and partnered with the County Department of Public Health to search for viable solutions. Though our vast efforts of educating our residents on the harmful effects of smoking, and surveying them for their feedback, we have transitioned several of our affordable housing sites to 100% smoke free developments. This was an effort achieved through the strength of our partnership and the educational health resources provided to our residents.

Administrative Services – The Administrative Services department assists other offices by providing oversight on matters pertaining to the agency’s compliance with state and federal requirements. As an example, this department works to ensure compliance with annual filings of Statement of Economic Interests, the Brown Act, Public Records Requests, Fair Housing and Americans with Disabilities Act (ADA). An agency-wide Needs Assessment is currently being conducted to ensure compliance with current ADA requirements, which will include input from outside agencies and a plan to address any deficiencies. This department also handles our legal issues and is our liaison between the agency and the legal team.

Development – Our centralized Office of Real Estate Development team is responsible for all Real Estate acquisition, rehabilitation, redevelopment and new construction projects. Our dedicated project managers often eliminate the costs associated with outside development and/or construction management consultants. The staff is continuously available to all AMPS as a technical, as well as planning and implementation resource for non-routine maintenance and emergency rehabilitation projects. The Department manages the completion of all Physical Needs Assessments and due diligence reports for the entire portfolio of HACSB residential developments. This department also oversees all of the Capital Fund improvement and rehabilitation projects within the public housing portfolio and administers all grant funding and debt financing that can be associated. Lately, the development team has been actively involved in implementing energy efficiency projects and in 2010 was awarded a \$1.84 million grant at our Maplewood Homes Community (leverage funds for the CFRC grant). This project is currently under construction. Finally, Development administers a very successful homeownership program that has helped 135 families overcome their barriers and achieve the American dream of owning a home. It is a program utilizing a variety of methods to achieve goals for our clients, including Section 32 (converted public housing), Section 8 Homeownership, and a Community Land Trust.

Procurement - Our centralized procurement department is responsible for agency wide contracts enable higher cost savings and fiscal prudence. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with the centralized procurement staff to define scopes of work, and ensuring the work is done properly.

Local Asset Management Implementation

Leadership - Our local asset management program will be led by a leadership team consisting of representatives from the following departments: housing programs, development, finance, administrative services, human resources, information technology, procurement and community affairs and policy. They will meet on a biweekly basis to review the combined efforts and ensure the

agency is striving to achieve its long-term objectives. This team is also responsible for our Strategic Plan and charters the path annually while ensuring significant milestones are met.

Project-based Management - We expect that all of our programs, regardless of funding source, to be accountable for project-based management, budgeting, and financial reporting. We apply the same expectation of aligning responsibility and accountability to those services that are managed centrally.

HACSB has been operating under project-based budgeting and accounting practices since 2006. We have developed systems and reports to facilitate the onsite management and analysis of budgets, expenses, rent collection and receivables, and purchasing. In accordance with HUD Asset Management guidance, HACSB decentralized its maintenance program in 2008 and each AMP was assigned maintenance personnel, depending on the size and maintenance requirements of the properties in the AMP. HACSB has a decentralized purchasing model for the acquisition of goods. Sites staff use a simple purchasing system that enables them to be able to purchase goods directly from their pool of vendors while still enabling management staff to track spending habits. While the acquisition of goods is decentralized, the agency has adopted a hybrid approach to the acquisition of its services. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with the centralized procurement staff to define scopes of work, and ensuring the work is done properly.

Cost Allocation Approach - Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, HACSB has identified all of its direct costs and segregated all its costs into pools, as either a direct or an indirect cost pool.

Direct Costs - OMB Circular A-87 defines direct costs as follows: Direct costs are those that can be identified specifically with a particular final cost objective. HACSB's direct costs include, but are not limited to:

- Contract costs readily identifiable with delivering housing assistance to low-income families.
- Housing Assistance Payments, including utility allowances, for vouchers
- Utilities
- Insurance

- Property-based audits
- Staff training
- Interest expense
- Information technology fees
- Portability administrative fees
- Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities
- Operating costs directly attributable to operating HACSB-owned properties
- Fleet management fees
- Maintenance services for unit or property repairs or maintenance
- Maintenance services include, but are not limited to, landscaping, pest control, decorating and unit turnover
- Community Services department costs directly attributable to tenants services
- Gap financing real estate transactions
- Acquisition costs
- Demolition, relocation and leasing incentive fees in repositioning HACSB-owned real estate
- Homeownership activities for low-income families
- Leasing incentive fees
- Certain legal expenses
- Professional services at or on behalf of properties or a portfolio, including security services
- Extraordinary site work
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families
- Any cost identified for which a grant award is made. Such costs will be determined as HACSB receives grants

Indirect Costs - OMB Circular A-87 defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. HACSB's indirect costs include, but are not limited to:

- Executive
- Communications
- Certain legal expenses
- Development

- Finance
- Purchasing
- Human Resources
- Housing Finance and Asset Management
- Administration staff and related expenses of the Housing Operations and Rental Assistance Departments that cannot be identified to a specific cost objective.

Indirect Services Fees - HACSB has established Indirect Services Fees based on anticipated indirect costs for the fiscal year. Any indirect costs incurred by HACSB in support of its projects and programs will be incurred by the Central Office Cost Center (COCC) and charged out to the programs in the form of a fee. The four fees are:

- Asset Management Fees
- Management Fees
- Bookkeeping Fees
- Indirect Services Fees

Asset Management Fees – This fee was described in Plan Year 2010 and was modified through our third amendment to the FY 2010 MTW Annual Plan. The Asset Management Fee uses our fungibility to transfer funds among AMPS and allows us to charge an asset management fee, regardless of whether a project has excess cash. The COCC will continue to charge the Asset Management to the AMPS at the HUD’s determined rate of \$10 per ACC unit

Management Fees – The COCC will continue to charge the Management Fee at the HUD’s determined rate of \$70.64 per units leased to the AMPS and 20% of Administrative Fees for Housing Choice Voucher program.

Bookkeeping Fees - The COCC will continue to charge the Bookkeeping Fee at the HUD’s determined rate of \$7.50 per unit leased to the AMPS and the Housing Choice Voucher program.

Indirect Service Fees – Before calculating the per unit indirect service fees, HACSB indirect costs are offset by designated revenue. Offsetting revenue includes 10 percent of the MTW Capital Fund Grant award, Asset Management Fees, Management Fees, Bookkeeping Fees, and other revenues. A per unit cost is calculated using the remaining net indirect costs divided by the number of units and the number of leased vouchers. For the 2015 budget, the per-unit per month (PUM) cost is \$0.

Per the requirements of OMB Circular A-87, the indirect services fees are determined in a reasonable and consistent manner based on total units and/or leased vouchers. The fees are calculated as a per-housing-unit or per-leased-voucher per month charged to each program. HACSB will annually review all of its indirect service fees charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis.

Differences between HUD Asset Management and HACSB LAMP - Under the First Amendment, HACSB is allowed to define costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR 990. HACSB is required to describe in this MTW Annual Plan differences between our Local Asset Management Program and HUD's asset management program. Below are the three key differences:






- HACSB determined to implement an indirect service fee that is much more comprehensive than HUD's asset management system. HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Low Income Public Housing (LIPH) property level. HACSB's LAMP is much broader and includes local housing and other activities not found in traditional HUD programs. HACSB's LAMP addresses the entire HACSB operation.
- HUD's rules are restrictive regarding cash flow between projects, programs, and business activities. HACSB intends to use its MTW resources and regulatory flexibility to move its MTW funds and project cash flow among projects without limitation and to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- HACSB charges an Asset Management Fee to all AMPS regardless of excess cash by each AMP by the use of our fungibility.

FDS Reporting – HACSB will continue to report on the HUD's established deadlines following the same format as previous years using the Asset Management with COCC/ elimination.

Appendix F: Non-MTW Related Information

Special Purpose Programs –

In addition to the MTW Voucher Program, HACSB administers other voucher programs and special programs, such as Mainstream, HOPWA, VASH and Shelter Plus Care.

-  **Mainstream** – This program is designed to provide rental assistance to persons with disabilities to enable them to lease affordable private housing of their choice. At the end of FY 2016, we were providing assistance to 95 families through this program.
-  **Housing Opportunities for Persons with AIDS (HOPWA)** - HACSB has partnered with Foothill Aids Project to offer rental assistance and supportive services to persons diagnosed with HIV/AIDS. The Foothill AIDS Project assesses the applicant’s duration of participation in their case management program and facilitates location of suitable housing to meet their clients’ needs. At the end of FY 2016, we were providing assistance to 36 families through this program.
-  **Veteran’s Affairs Supportive Housing (VASH)** - HACSB and Veterans Administration Medical Center have partnered to provide rental vouchers and supportive services to eligible homeless veterans with severe psychiatric or substance abuse disorders. The program goals include promoting maximal Veteran recovery and independence to sustain permanent housing in the community for the Veteran and the Veteran’s family. At the end of FY 2016, we were providing assistance to 334 families through this program.
-  **Master Leasing Program** – This program is funded by State of California Mental Health Services Act funds and serves mentally ill or developmentally disabled families with emergency shelter housing. Case management and comprehensive support services are provided for residents participating in this program. At the end of FY 2016, we were providing assistance to 16 families through this program.
-  **Shelter Plus Care Programs (S + C)** - The Shelter Plus Care Program provides rental assistance for hard-to-serve homeless persons with disabilities in connection with supportive services funded from sources outside the program. HACSB currently administers the following Shelter Plus Care vouchers:
 - **Stepping Stones (S + C)** - This program provides rental assistance for chronically homeless individuals and families in connection with supportive services funded through the Department of Behavioral Health (DBH). Under this program, HACSB provides the housing services based on eligible referrals from the Coordinated Entry System (CES) and DBH, matches the housing funds by providing supportive services. At the end of FY 2016, we were providing assistance to 40 families through this program.
 - **New Horizons (S + C)** – This program provides rental assistance for hard to serve persons with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). This is an ongoing program, and all turnover vouchers focus on providing housing to chronically homeless households. Under this program, HACSB provides the housing

services based on eligible referrals from the CES and DBH, matches the housing funds by providing supportive services. At the end of FY 2016, we were providing assistance to 181 families through this program.

- ***Laurelbrook Estates (S + C)*** – This program assists individuals or families experiencing disabling conditions and homelessness and is a Project Based S+C voucher subsidy tied to designated scattered sites throughout the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health. At the end of FY 2016, we were providing assistance to 25 families through this program.
- ***Project Gateway (S + C)*** – HACSB formed a partnership with Ontario Housing Authority, Mercy House Living Centers Inc. and Department of Behavioral Health (DBH) to provide permanent housing in conjunction with long term supportive services including mental health care, employment, self-sufficiency etc. to our homeless community. At the end of FY 2016, we were providing assistance to 12 families through this program.
- ***Cornerstone (S + C)*** - This program implemented in 2012, and provides rental assistance for hard to serve homeless individuals and families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). HACSB provides the housing services based on eligible referrals from the CES and DBH, matches housing funds by providing supportive services. At end of FY 2016, we were providing assistance to 27 families through this program.
- ***Whispering Pines (S + C)*** - This program implemented in 2012, and provides rental assistance for hard to serve homeless individuals and families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). HACSB provides the housing services based on eligible referrals from the CES and DBH, matches housing funds by providing supportive services. At the end of FY 2016, we were providing assistance to 12 families through this program.
- ***Lantern Woods (S + C)*** - This program implemented in 2012 and is a Project Based S+C voucher subsidy tied to designated sites in the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health for homeless individuals and families. At the end of FY 2016, we were providing assistance to 15 families through this program.

HACSB College Scholarship Program

For 24 years, the Housing Authority has been proud to assist eligible participants in achieving their higher educational goals through scholarships. To date, HACSB has awarded 285 students with \$208,750 in scholarships. Current participants/residents in Housing Choice Voucher programs, Public Housing programs, or other HACSB affordable housing communities are eligible to apply. Students need to be accepted by or currently attending a four-year college/university, community college, or technical/vocational school. Students attending a four-year college or university receive a \$1,500 scholarship while community and technical/vocational students receive a \$750 scholarship. The Housing Authority uses non-public funds to promote educational success among their participants.

In 2016 fourteen students were awarded scholarships to assist them with their college expenses. The recipients are attending one of the following colleges/universities: Beaumont Adult School, Chaffey Community College, Crafton Hills Community College, California State Polytechnic University Pomona, California State University Fullerton, University of California Riverside, Riverside Community College, San Bernardino Valley College, University of Redlands, University of La Verne, West Coast College, and Victor Valley College. Their areas of study include majors such as: Biomedical Research, Kinesiology, Creative Writing, Childhood Development, Educational Leadership, Human Resources, Social Work, Teaching, and Nursing.

HACSB also received a \$1,500 donation for the scholarship fund from Mr. Bob Doshi and his family, longtime landlords of our voucher program. This is the second year that the Doshi family has donated to this cause. Mr. Doshi believes in helping our families succeed: “We care about the families we serve through the Housing Authority and education is a key component to success.” He hopes his contribution will also inspire other landlords of the program to donate to this important cause.

Knowledge & Education for Your Success (KEYS)

KEYS is a 501(c)(3) nonprofit corporation created in 2009 by HACSB to consolidate HACSB’s array of supportive services, centralize strategic community partnership development, and to provide additional support and services for economically disadvantaged families and children. The development of KEYS created a unique opportunity to utilize non-traditional, non-PHA funding sources to bring additional resources not only to the clients that HACSB serves, but to be able to spread resources to those in need, not directly served by HACSB, subsequently assisting HACSB in achieving our mission of *empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.*

The mission of KEYS is to empower low-income individuals and families in San Bernardino County and to unlock their potential for success. Our vision is for individuals and families to have the skills and resources necessary to thrive.

Over the past few years, KEYS has focused on some of the families in greatest need throughout San Bernardino County. In 2013 KEYS launched the Supportive Services for Veterans Families Program (SSVF) to provide Rapid Re-housing and supportive services to homeless veterans that allowed KEYS to play an active role in decreasing homelessness among veterans and their families, in addition to enlisting housing stabilization planning to reduce the amount of veterans returning to homelessness. In the past 2 fiscal years, KEYS staff have played an integral role in the county’s success at addressing the needs of our homeless veterans and quickly transitioning them back into permanent housing. KEYS staff are lead partners in the county’s Homeless Veterans Community Planning Group, which, along with the support of the Homeless Advisory Council (led by the County CAO’s office), placed over 700 veterans into permanent housing.

In 2015, following the success of the SSVF program, KEYS partnered with HACSB and the San Bernardino County Transitional Assistance Department (TAD), and launched the Housing Support Program (HSP), a Rapid Rehousing program based on national best practices to rapidly transition eligible homeless families with children back into permanent housing. With the success of the HSP program, KEYS has become the largest provider of

Rapid Rehousing to families with children in the county. In the past few fiscal years, KEYS has rehoused 740 families including 1,714 children, back into permanent housing.

KEYS later expanded on their existing services and started the Keys for Life Program (KFL), a continuum of care rapid rehousing program for families with children that needed intensive case management services for longer periods of time in an effort to provide housing stability and prevent the families from retuning to homelessness. As part of the ongoing support of the families and to ensure stabilization KEYS utilizes its Family Strengthening casework model to ensure resources and tools are in place for the family to maintain their housing over time and increase economic independence. Building on that success, KEYS was awarded a further Continuum of Care grant to rapidly rehouse, both individuals and families. The new program, Keys for Success launches in July 2017 and could potentially serve up to 40 additional households.

KEYS continues to focus on a collective impact strategy which aligns with a county wide approach. KEYS is committed to utilizing its unique casework model as it works to develop new partnerships and bring additional funding resources into the region to meet the needs of the county's most vulnerable households and enhance resources within our local communities.

Together KEYS, HACSB, and our many community partners are working diligently to change the trajectory for families living in poverty and provide a safe and unique environment to help them thrive and become self-sufficient.

Other Affordable Rental Housing

HACSB owns 1,199 Non-HUD residential units along with 4 commercial units (Frankish Building). Many of those units are affordable as a result of public funds, such as HOME and Redevelopment Housing Set-Aside funds. For more information please refer to the Authority Owned Housing Stock under the Housing Stock Information in Section II: General Housing Authority Operating Information of this report.

Affiliate Non-Profit – Housing Partners I, Inc. (HPI, Inc.) was created in 1991 to develop, own, and manage affordable housing as an affiliate non-profit of HACSB. HPI, Inc.'s designation as a Community Housing Development Organization (CHDO) allows it to apply for and receive HOME funds from the County of San Bernardino, Department of Community Development and Housing and other cities for the acquisition, development and rehabilitation of housing units. With over 20 years of housing development experience behind it, HPI, Inc. provides HACSB the means with which to leverage a variety of public as well as private funding sources to continue to increase the supply of affordable housing throughout the county of San Bernardino.

In 2015 HPI broke ground on the Horizons at Yucaipa development, a new construction affordable senior project that will be completed in the fall of 2016. HPI also acquired a 25-unit development in the City of Loma Linda for homeless and affordable Veteran Housing, providing much need supportive services to Veterans living on site. Overall in 2015 HPI is constructing or partnering in over 300 new affordable housing units within San Bernardino County.

HPI Property Acquisitions LLC is an HPI, Inc. controlled entity that owns 241 units throughout the County of San Bernardino. HPI Inc. and its affiliates own a total of 654 units, detailed in the list below.

Affiliate Non-Profit			
Property Name	City	Units	Entity
Acacia Property	Fontana	28	HPI Property Acquisition LLC
Desert Village	Victorville	46	HPI Property Acquisition LLC
Chehalis Property	Apple Valley	30	HPI Property Acquisition LLC
Kendall Drive Apts.	San Bernardino	37	HPI Property Acquisition LLC
Kendall Park Apts.	San Bernardino	52	HPI Property Acquisition LLC
Robert O. Townsend	Montclair	48	HPI Property Acquisition LLC
Phoenix Apartments	San Bernardino	7	HPI Wall Avenue LLC
Vista del Sol	Redlands	71	HPI, Inc. Portfolio
Scattered Sites – Region 1	Loma Linda, Redlands, Yucaipa, Bloomington, Colton, Fontana, Rancho Cucamonga	97	HPI, Inc. Portfolio
Scattered Sites – Region 2	Ontario, Montclair, Chino	107	HPI, Inc. Portfolio
Scattered Sites – Region 3	Adelanto, Apple Valley, Hesperia, Victorville, Joshua Tree, 29 Palms, Yucca Valley	131	HPI, Inc. Portfolio
TOTAL UNITS		654	

Appendix G: Impact Analysis

Subsidy Limitation for Over-Housed Families

Applicable to Activity 20: Term-Limited Lease Assistance and Activity 22: Streamlined Lease Assistance

The proposed modification to limit the rental subsidy for over-housed families will apply to families assisted through the tenant-based Housing Choice Voucher program whose tenant rent portion and rental subsidy are income-based. The proposed modifications would not apply to families whose rent is calculated using the flat-subsidy methodology currently applicable to families participating in the Term-Limited Lease Assistance program.

For the purpose of this analysis, HACSB analyzed the hypothetical impact to families who were admitted to the tenant-based Housing Choice Voucher program in fiscal year 2017 and who were over-housed, excluding those who were admitted to the Term-Limited Lease Assistance Program. The sample size is 81 families.

The intent of the proposed modification is to reduce housing assistance payment (HAP) costs associated with a family’s decision to lease a unit that is larger than the subsidy size (or “voucher size”) for which they are eligible. In such cases, the family’s decision frequently results in HAP costs that are higher than those paid for similarly-positioned families leasing units that are the same size as their voucher. Under this modification, both the tenant portion and HAP portions will change. The following table illustrates the changes in each portion as they would apply to the families admitted in FYE 2017.

	Current Average	New Average	Average Change	Current Median	New Median	Median Change
Tenant Rent – In Dollars	\$411	\$580	\$169	\$341	\$556	\$143
Tenant Rent Burden* <i>Tenant Rent/Monthly Income</i>	32%	51%	19%	28%	47%	13%
HAP	\$800	\$631	-\$169 (-17%)	\$747	\$593	-\$143 (-20%)

**Tenant rent burden calculations exclude 2 families with zero annual income. Rent burden cannot be calculated for these families.*

The proposed modification will result in a reduction of HACSB’s projected funding deficit. In this analysis, the total annual HAP savings was more than \$164,000.

Appendix H: Impact Analysis

Activity 22: Streamlined Lease Assistance Program

The proposed modifications to the Streamlined Lease Assistance subsidy calculation includes two components:

1. Modification to the tiered rent schedule for families currently participating in the Tiered Assistance Program for Existing Non-Elderly/Non-Disabled Households.
 - This change will eliminate the 24% and 27% rent tiers.
2. Modification to the maximum rent tiers for families currently participating in the Tiered Assistance Program for Existing Non-Elderly/Non-Disabled Households.
 - This change will add two additional rent tiers of 33% and 36%.

These modifications are proposed in order to address the significant funding deficit projected based upon the current rental subsidy methodology and anticipated program funding.

Under each modification, the primary impact to families is increased rent burden. Families currently participating in the Tiered Assistance Program are currently paying 21% to 24% of gross income toward rent (with the exception of families paying the \$125 minimum rent or a baseline rent established for the family under the Streamlined Lease Assistance Program). If modification 1 is approved, the rent burden for these families will be 30% of gross income. If modification 2 is approved, the rent burden will ultimately increase to 33% and 36%.

The proposed modification will result in significant reduction of the projected funding deficit. The following table compares the potential accumulated deficit as of FYE 2020 if 1) no changes are made, and 2) if modification 1 is approved and implemented beginning January 1, 2018, with all Tiered Assistance Program families moved to the 30% subsidy calculation by June 30, 2018, with an automatic six-month hardship exemption. As shown, in the worst-case scenario of 90% funding proration, the projected deficit is reduced from \$27.6 million with no changes to \$15.4 million if modification 1 is implemented as described above.

Funding Proration	Total Deficit as of FYE 2020 with NO CHANGES	Total Deficit as of FYE 2020 with Modification 1
99.5%	\$ (19,875,616)	\$ (10,527,246)
95%	\$ (15,231,258)	\$ (5,608,572)
94%	\$ (17,571,353)	\$ (8,051,415)
90%	\$ (27,638,586)	\$ (15,495,828)

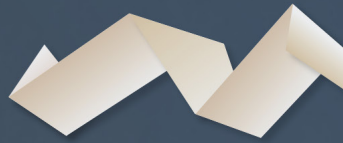
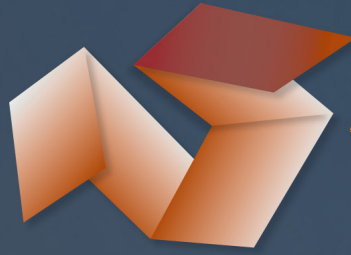
HACSB recognizes that while this modification is urgently needed in order to address the projected deficit, it will also have a significant impact on each family’s rent portion. To minimize the impact on families, HACSB proposes to implement a hardship exemption that will provide a six-month grace period before the family’s new rent portion applies. The exemption may be applied automatically depending on how quickly HACSB implements the subsidy calculation. Additionally, HACSB will consider other methods of minimizing the impact to families, such as using prior income information to process the reexamination and potentially skipping one reexamination to allow the family rent portion to level off.

Appendix I: Fact Sheets

At HACSB, communication and education of team, participants, residents, landlords and community is critical to the success of our innovative programs. We have attached some of our sample Fact Sheets which are handy reference guides about our MTW programs and services. These fact sheets are posted online at www.hacsb.com and are also available at our offices.



HOUSING AUTHORITY
COUNTY
OF SAN BERNARDINO



HACSB Programs & Services Overview

FACT SHEET



HOUSING AUTHORITY

OF THE COUNTY OF

SAN BERNARDINO

Who We Are

The Housing Authority of the County of San Bernardino (HACSB) is one of the most progressive housing authorities in the Country and also the largest provider of affordable housing in San Bernardino County. HACSB proudly owns and/or manages programs with approximately 12,500 housing units and vouchers combined to serve approximately 30,000 people, most of whom are seniors, individuals with disabilities, veterans, and children.

Housing that is affordable is necessary for families of all income ranges, and HACSB is committed to providing both traditional affordable housing assistance as well as mixed-income housing that complements existing communities. Below are the three programs HACSB manages and /or administers:

Public Housing Program

These housing units are HACSB owned and managed throughout various affordable housing communities in San Bernardino County. Program residents live at these designated housing sites and the housing assistance is tied to the unit.

Voucher Rental Assistance Programs

These housing units are privately owned by landlords in the community. Program participants rent from private landlords and HACSB pays the rental subsidy to the owner on the participants' behalf.

Authority-Owned Units

These HACSB owned housing units were either acquired or developed through various partnerships.

Moving to Work

As a non-traditional housing authority, the agency's success is a result of the business approach to strategic planning and delivery of services. As a high-performing and innovative agency, in 2008, HACSB received the Moving to Work (MTW) designation by Congress and the U.S. Department of Housing and Urban Development (HUD). This designation provides HACSB with the flexibility to waive some HUD program requirements and develop local policies that are best suited for the various communities in San Bernardino County.

As a result, HACSB has transformed its agency by executing innovative initiatives based on the three key MTW objectives: saving taxpayer dollars through efficient work; helping families achieve economic independence; and ensuring a family's freedom of housing choice.

The table below highlights the changes HACSB has implemented as a result of being an MTW agency; efforts that transitional Housing Authority may not necessarily be able to

Years of Service
75
Housing Authority

accomplish. Currently there are 39 designated MTW agencies out of 3,200 housing authorities nationwide.

These activities have resulted in positive outcomes related to the three MTW objectives for HACSB and the families we serve. In FY 2016, the following outcomes were achieved as a result of changes made with MTW flexibility:

- Total cost savings from all MTW activities:

Administrative Efficiencies

Single Fund Budget	Local Asset Management Program
Strategic Investment Policies	Operating Subsidy for Vista del Sol
Alternate Assessment Program	Property Management Innovation
Biennial Recertifications	Utility Allowance Reform
Local Verification Policies	Streamlined Lease Assistance Program
Elimination of Assets	
Controlled Program Moves	
Local Inspection Standards	

Economic Independence

Local Policies for Portability	Term Limited Lease Assistance Program
Elimination of Earned Income Disallowance	No Child Left Unsheltered
Minimum Rent	Transition for Over-Income Families
Local Income Inclusion	Pilot "Work" Requirement
Local FSS program	

Expanding Housing Choice

Local Project-Based Voucher Program	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing
Local Payment Standards	

\$831,570*

- Staff time savings from all MTW activities: **29,296** staff hours*
- Average earned income for families participating in the Streamlined Lease Assistance Program increased by 10%, and

the number of families receiving TANF decreased by **2.3%** in the two years since implementation.

- **42%** of families who were paying the HACSB minimum rent of \$125 have increased their income and are now supporting an average rent of \$319.
- The number of families leasing in areas of poverty and/or minority concentration has decreased by **7%** as a result of the Local Payment Standards activity.

* As compared to the baseline year for each activity.

More than Just Housing

HACSB also works to provide families with the resources and skills necessary to transition off of government-assisted programs and into economic independence. As a reflection of its mission and service philosophy, HACSB coupled supportive services with various MTW initiatives such as term limits, rent reform such as minimum rent increases, and others. Initiatives such as these insure greater personal accountability for the families while providing meaningful services to help them achieve economic self-sufficiency.

Resources and Support

HACSB's Career Development Initiatives Team helps families with career mentoring; resume building; overcoming barriers to employment; financial literacy/capability skills, such as budgeting and credit/asset building; and other employment development services.

The partnership with the San Bernardino County Workforce Development Department (WDD) provides on-site Workforce Development Specialists (WDS) who work exclusively with HACSB customers, particularly term-limited families. Since 2013, the WDD and HACSB staff have performed approximately 500 job placements with wages ranging from \$9 to \$23.50 per hour. HACSB

and WDD also established the Youth Employment Program for 16- to 24-year-olds to take advantage of up to six months of subsidized employment experience.

Mutual customers have access to the county's Transitional Assistance Department (TAD) Programs and Supportive Services and are specifically targeted for the CalWORKS Youth Employment Program and the CalWORKS Subsidized Employment Program for adults. Services are also better aligned where HACSB provides housing support and coaching while TAD offers job training, placement opportunities, and supportive services, such as transportation assistance, paid child care, and assistance with work-related and education costs.

Over the past 25-years through HACSB's Annual Scholarship Program, HACSB has awarded 285 students attending colleges, universities, and technical/vocational schools with \$208,750 in scholarships.

HACSB program participants can take advantage of HACSB's Homeownership Assistance Program, which since its inception in 2000 has helped 219 families achieve homeownership. Since 2009, this program has ranked among the top in the nation in creating new homeowners each year.

Staff make direct referrals to over 50 partner agencies to provide program participants with vocational training, ESL classes, financial literacy education, parenting classes, mental health services, support groups, and small business development classes.

HOUSING AUTHORITY

of the County of San Bernardino
by the numbers:

1,905
Authority-owned units throughout
41 developments in 16 cities

15
public housing developments in 9 cities

50+
community and government partners

29,988 residents/participants housed,
making up 1.6% of the county's population

11,862
families housed

6,059
individuals with
disabilities housed

216
clients became new
homeowners since 2000

285
scholarship recipients since 1991

10,603
vouchers for 27,103 individuals

11,860
children 18 years
and younger housed

3,401
seniors 62 years
and older housed

609
public housing units for
1,675 individuals

52,330
applicants on various waiting lists

\$115.6 million
infused into the county's economy
during fiscal year 2015-16

\$76.7 million
paid to nearly 4,000 landlords
for housing assistance

\$8.6 million
paid to 700 vendors for various
programs and services

\$3.8 million
spent on rehabilitation, construction
and acquisition of housing units

121
employees across 16 offices



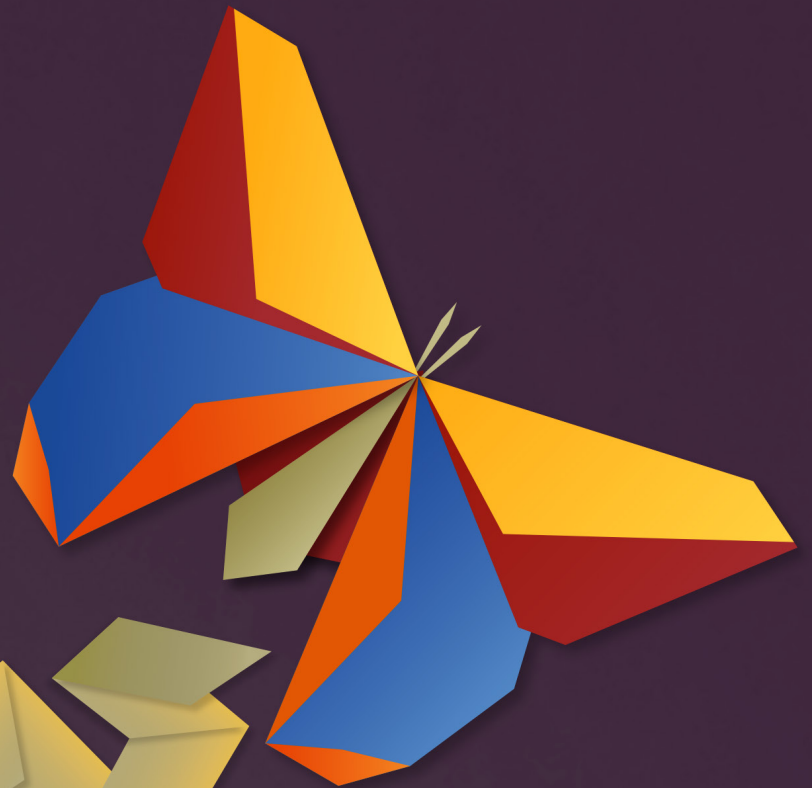
MARCH
2017

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HOUSING AUTHORITY
COUNTY
OF SAN BERNARDINO



Term-Limited Lease Assistance Program

FACT SHEET

TERM-LIMITED LEASE ASSISTANCE

PROGRAM

In April 2017 families participating in the Term-Limited Lease Assistance Program will begin to reach their end of term, and the housing assistance and supportive services they receive will conclude. HACSB is closely monitoring these families and taking steps to prepare them for the transition.

OUTCOMES FROM YEAR FOUR

Income and Employment

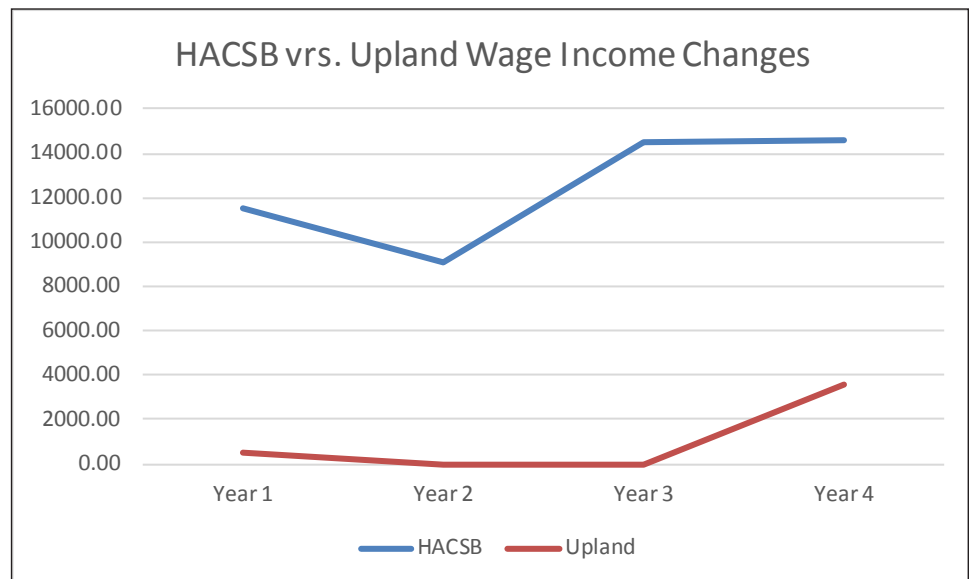
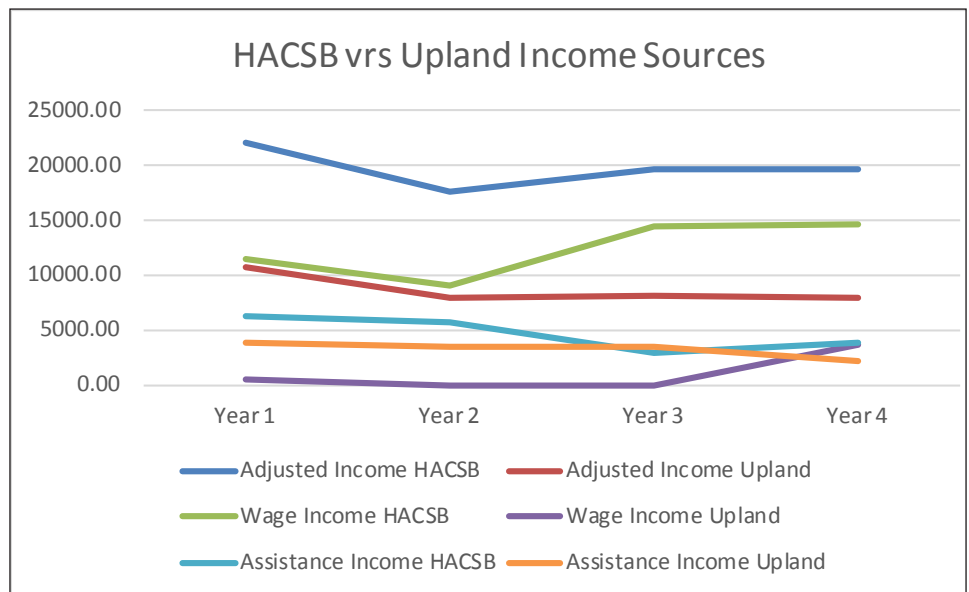
- Average Household Income: **\$23,108**
- Average Household Earned Income: **\$15,469**
(\$22,598 for families with earned income)
- Families with Earned Income: 68.5%
- Changes from year 1 to year 4:
 - **21.5%** Increase in income from wages
 - **37%** Decrease in income from welfare
 - **18.9%** Increase in full-time employment
 - **13.4%** Decrease in unemployed

Education

- Decrease in families without high school diploma (year 1 to year 4): **35.5%**
- Increase in undergrad degrees: **5.1%**

Early Exits

- Total exits between years 1-4: **38.9%**
- On Average 11-20% of families exit by the second year, 27-36% of families exit by year 3
- In comparison to current families, early exiting families have (excluding families exited for policy violations):
 - Higher Total and Wage income
 - More likely to have full time employment (with health benefits)



FIVE-YEAR LEASE ASSISTANCE PROGRAM

Established in 2012, the Five-Year Lease Assistance Program is designed to help families achieve economic independence while they receive five years of housing assistance through the Housing Choice Voucher program. The program integrates case management and supportive services during the term of assistance to help participating families advance personally and professionally in order to be better equipped to achieve economic self-sufficiency. Innovative programs like this are vital to addressing the growing need for affordable housing in our communities and made possible given our special Congressional designation under the Moving to Work demonstration program.

FIFTH YEAR ACTIVITY

During their final year of assistance, communications with the family and landlord take place more frequently, ensuring that the family is aware of the approaching conclusion of assistance and has the opportunity to communicate any new challenges to their CDI caseworker. As the graduation date approaches, the family is also provided with the opportunity to request a hardship exemption for a temporary extension of assistance.

HACSB is also giving special attention to families that may be unprepared for leasing without assistance. Beginning at 18 months prior to the conclusion of assistance, these families receive additional intensive case management and support, including required monthly check-ins with their caseworker, a reassessment of the family's goal plan to address remaining challenges, and further support through HACSB partnerships such as with San Bernardino County Transitional Assistance Department and Workforce Development Department to help the family achieve stable employment.

Families in the Fifth Year

61.1% of families remained in the program for a fifth year

- 16.7% of these families have incomes that are > 50% AMI and **Ready to Exit**
- 51.1% of these families have incomes between 30-50% AMI, full time employment and are **Close to Exiting**
- 32.2% are under employed and **Not Yet Ready to Exit**
 - The majority have education levels that can lead to sustainable employment (HS degree or higher).
 - 45% (or 70 families) do not have a HS degree of higher, are still receiving significant welfare support and have not improved their income over the four years.

Comparison to Upland Voucher Program

Given the positive improvements in income from the HACSB program, and paralleled local area economic improvement, it was necessary to determine whether the HACSB economic improvement were unique to the five year program, or a function of area economic improvement. Hence a comparison to the Upland Voucher program. This program does not have a term limit or the additional supports seen in the HACSB five year program.

- 153 Upland families were compared to the 1650 HACSB families within the same timeframe (2012–2016)
- Year 4 median annual Wage Income for HACSB families was \$14,615 in comparison to Upland's \$3,600
- HACSB showed a 26.7% increase in wage income from year 1 to 4 in comparison to Upland's 19.7% increase.
- HACSB increased the number of families with Earned Income by 9.0% in comparison to Upland's increase of 6.0%.

Hardship Exceptions

HACSB recognizes that families nearing the commencement of assistance may face unforeseen challenges that delay their preparedness for self-sufficiency. To provide a safety net for families working along their goal

path to achieve self-sufficiency, HACSB has developed two hardship exceptions to the term limit. Families may apply for an extension in one of the following categories:

UNFORESEEN LOSS OF INCOME:

This exception will apply to families experiencing an unforeseen loss of income, such as loss of employment, within the last three months of participation. This one-time exception will provide six additional months of assistance.

COMPLETION OF ACTIVITY RELATED TO SELF-SUFFICIENCY:

This exception will apply to families who need additional time to complete a self-sufficiency goal identified in their ITSP. The family must be actively working toward meeting the goal at the time the exception is requested, and the goal must be achievable within the term of the extension. For example, a family may be granted an exception to complete the final year of a four-year degree program. This one-time exception will provide up to two years of additional assistance.

FUTURE MONITORING

HACSB is implementing a voluntary survey system that will allow us to continue monitoring the family for up to two years after the conclusion of assistance. The annual survey will collect information about the family's education/training and employment status, household income, housing status, and other factors. Participating families will receive a monetary incentive for completing each survey. The information will allow HACSB to assess the impacts of the Term-Limited Lease Assistance Program on families post-assistance, and to make modifications to the program as needed.





JANUARY
2017

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Appendix J: Summary of MTW Activities

ACTIVITY	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR(S)	STATUS
Activity 1	Single Fund Budget	Administrative Efficiency	FY 2009	Implemented
Activity 2	Strategic Investment Policies	Administrative Efficiency	FY 2009	Implemented
Activity 3	Alternate Assessment Program	Administrative Efficiency	FY 2009	On Hold
Activity 4	Biennial Recertifications	Administrative Efficiency	FY 2009, FY 2012	Implemented
Activity 5	Local Verification Policies	Administrative Efficiency	FY 2009	Implemented
Activity 6	Elimination of Assets	Administrative Efficiency	FY 2009	Implemented
Activity 7	Controlled Program Moves	Administrative Efficiency	FY 2009	Implemented
Activity 8	Local Policies for Portability	Economic Independence	FY 2009, FY 2010	Implemented
Activity 9	Elimination of Earned Income Disallowance	Economic Independence	FY 2009	Implemented
Activity 10	Minimum Rent	Economic Independence	FY 2009	Implemented
Activity 11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009, FY 2011	Implemented
Activity 12	Local Payment Standards	Expanding Housing Opportunities	FY 2009, FY 2012	Implemented
Activity 13	Local Inspection Standards	Administrative Efficiency	FY 2010	Implemented
Activity 14	Local Asset Management Program	Administrative Efficiency	FY 2010	Implemented
Activity 15	Pilot Work Requirement	Economic Independence	FY 2010	Implemented
Activity 16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
Activity 17	Local Income Inclusion	Economic Independence	FY 2011	Implemented
Activity 18	Property Management Innovation	Administrative Efficiency	FY 2011	Implemented
Activity 19	Local FSS program	Economic Independence	FY 2011	Implemented
Activity 20	Term-Limited Lease Assistance Program	Economic Independence	FY 2011, FY 2015	Implemented
Activity 21	Utility Allowance Reform	Administrative Efficiency	FY 2012	Closed Out - Never Implemented
Activity 22	Streamlined Lease Assistance Program	Administrative Efficiency	FY 2013	Implemented
Activity 23	No Child Left Unsheltered	Economic Independence	FY 2014	Implemented
Activity 24	Transition for Over-Income Families	Economic Independence	FY 2014	Implemented
Activity 25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
Activity 26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Not Yet Implemented