



**HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO**
Building Communities, Changing Lives

80 1941 · 2021
YEARS

2022 Moving to Work ANNUAL PLAN

Housing Authority of the County of San Bernardino



*Building Communities
Changing Lives*

MTW DESIGNATED AGENCY



HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO

BOARD of COMMISSIONERS



Tim Johnson
CHAIR



Beau Cooper
VICE CHAIR



Sylvia Miller



Cassie MacDuff



Jessie Muñoz



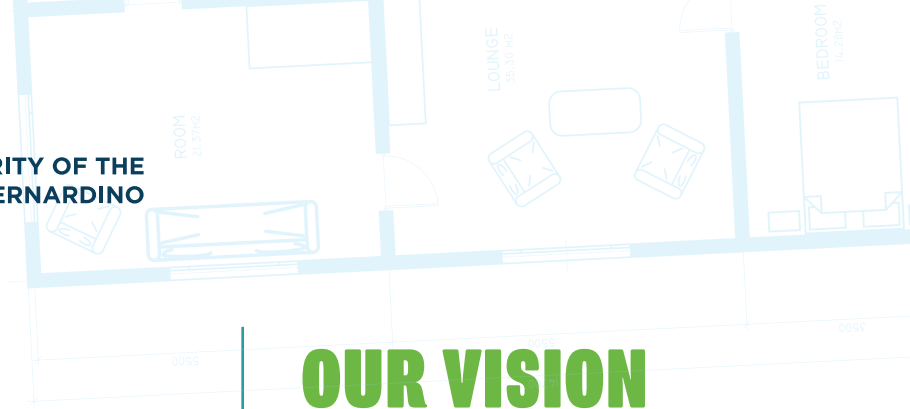
**Dr. Ciriaco "Cid"
Pinedo**



Bobby Tarango



HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO



OUR MISSION

The Housing Authority of the County of San Bernardino 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

The Housing Authority of the County of San Bernardino is committed to creating a world in which all people have a stable and enriched quality of life.

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 and seniors can enjoy a high quality of life.

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 to 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



Nicole Beydler
DIRECTOR OF POLICY AND
PUBLIC RELATIONS



Rishad Mitha
DIRECTOR OF
OPERATIONS

FOR MORE INFORMATION

Should you have any questions or need additional information, please contact Nicole Beydler at: nbeydler@hacsb.com.

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.

I. INTRODUCTION.....	1
WHO WE ARE	1
<i>Our Vision</i>	1
<i>Our Mission</i>	1
<i>Our Core Values</i>	1
THE MOVING TO WORK DESIGNATION	1
CONTENTS OF THIS PLAN	2
LONG-TERM GOALS.....	3
SHORT-TERM GOALS	3
II. OPERATING INFORMATION	5
AGENCY OVERVIEW	5
A. HOUSING STOCK INFORMATION	7
B. LEASING INFORMATION	13
C. WAITING LIST INFORMATION	15
III. PROPOSED ACTIVITIES.....	17
<i>Activity 28: Landlord Incentives</i>	17
IV. APPROVED ACTIVITIES	19
A. IMPLEMENTED ACTIVITIES.....	19
<i>Activity 1: Single-Fund Budget</i>	19
<i>Activity 4: Biennial and Triennial Recertifications</i>	20
<i>Activity 5: Simplified Income Determination</i>	23
<i>Activity 8: Local Policies for Portability</i>	26
<i>Activity 10: Minimum Rent</i>	28
<i>Activity 11: Local Project-Based Voucher Program</i>	30
<i>Activity 12: Local Payment Standards and Alternative Flat Rents</i>	34
<i>Activity 13: Local Inspection Policies</i>	37
<i>Activity 14: Local Asset Management Program</i>	39
<i>Activity 18: Property Management Innovation</i>	40
<i>Activity 19: Local Family Self-Sufficiency Program</i>	42
<i>Activity 20: Term-Limited Lease Assistance</i>	43
<i>Activity 22: Streamlined Lease Assistance</i>	48
<i>Activity 23: No Child Left Unsheltered</i>	52
<i>Activity 24: Transition for Over-Income Public Housing and Housing Choice Voucher Families</i>	56

<i>Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing</i>	58
<i>Activity 26: Local Disaster Short-Term Rental Assistance Program</i>	60
<i>Activity 27: Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents</i>	62
B. NOT YET IMPLEMENTED ACTIVITIES	66
C. ACTIVITIES ON HOLD	67
<i>Activity 3: Alternate Assessment Programs</i>	67
D. CLOSED OUT ACTIVITIES	68
<i>Activity 2: Strategic Investment Policies</i>	68
<i>Activity 6: Elimination of Assets</i>	68
<i>Activity 7: Controlled Program Moves</i>	69
<i>Activity 9: Elimination of Earned Income Disallowance</i>	69
<i>Activity 15: Pilot Work Requirement</i>	70
<i>Activity 16: Operating Subsidy for Vista del Sol</i>	70
<i>Activity 17: Local Income Inclusions</i>	71
<i>Activity 21: Utility Allowance Reform</i>	71
V. SOURCES AND USES OF MTW FUNDS	72
A. ESTIMATED SOURCES AND USES OF MTW FUNDS	72
B. LOCAL ASSET MANAGEMENT PLAN	75
C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION	76
VI. ADMINISTRATIVE	77
A. BOARD RESOLUTION AND CERTIFICATION OF COMPLIANCE	77
B. DOCUMENTATION OF PUBLIC PROCESS	83
C. PLANNED AND ONGOING EVALUATIONS	87
D. LOBBYING DISCLOSURES	88
APPENDICES	91
APPENDIX A. CAPITAL FUND PROGRAM – FIVE-YEAR PLAN AND BUDGET	91
APPENDIX B. ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT (FORM HUD-50075.1)	95
APPENDIX C. LOCAL ASSET MANAGEMENT PLAN (LAMP)	101
APPENDIX D. NON-MOVING TO WORK INFORMATION	106
APPENDIX E. FACT SHEETS	110
APPENDIX F. SUMMARY OF HACSB MOVING TO WORK ACTIVITIES	115

I. Introduction

Who We Are

As the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 25,000 people, most of whom are seniors, individuals with disabilities, veterans, and children. Since 1941, we have helped low-income families attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). More than 10,500 families are served through housing assistance payments made to landlords on behalf of the families. Other families reside in units owned and managed by HACSB. These programs provide a critical safety net for families in San Bernardino County.

Our service to the community is built upon our Vision, Mission, and Core Values. These principles direct our efforts and guide our interactions with every customer.

Our Vision

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

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 Core Values

Respect
Safety
Integrity
Service

The Moving to Work Designation

Moving to Work (MTW) is a national demonstration program for housing authorities to design and test affordable housing strategies and related policies. MTW-designated agencies are required to develop local policies and programs targeting at least one of the three MTW Statutory Objectives:

1. Reduce program costs and increase cost efficiency
2. Encourage assisted families to pursue economic self-sufficiency
3. Increase housing choice for low-income families

Fewer than 2% of housing authorities across the country are designated as MTW agencies. The lessons learned by these agencies can influence national housing policy to improve housing programs and services for all families.

As a testament to our high performance, HACSB was designated by Congress in 2008 as a Moving to Work (MTW) agency. The MTW designation allows HACSB to waive some HUD program requirements to develop local policies adapted to the diverse communities that make up San Bernardino County. Since receiving the MTW designation, HACSB has developed and received approval for 27 MTW activities.

Contents of This Plan

This Annual Moving to Work Plan provides detailed information on the planned use of MTW flexibilities during HACSB's fiscal year. Information is organized into the following sections following the format required by HUD as outlined in the current approved Form HUD-50900:

- *Section I: Introduction* provides information about HACSB's short term and long-term goals and accomplishments.
- *Section II: General Housing Authority Operating Information* provides an overview of the agency's housing portfolio, leasing rates, and wait list information.
- *Section III: Proposed MTW Activities* contains proposed new MTW activities and/or proposed changes to previously approved MTW activities. Previously approved activities are included in this section if there is proposed modification that requires new MTW authorization, while minor modifications to previously approved activities are included in Section IV.
- *Section IV: Approved MTW Activities* provides information on previously approved uses of MTW authority, including minor modifications not requiring new MTW authorization.

Plan includes information about authorization to use certain MTW flexibilities. Authorization to apply these activities to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes. HACSB MTW activities that will be applied to the EHV program are:

- *Biennial & Triennial Recertifications (Activity 4)*
- *Simplified Income Determination (Activity 5)*
- *Minimum Rent (Activity 10)*
- *Local Payment Standards (Activity 12)*
- *Local Inspection Standards (Activity 13)*
- *Section V: Sources and Uses of MTW Funds* describes the agency's projected MTW revenues and expenditures for the fiscal year, planned use of the MTW single-fund flexibility, and information about HACSB's local asset management program and participation in the Rental Assistance Demonstration (RAD).
- *Section VI: Administrative* provides required administrative information, including information about the approval process for this Plan.

Long-Term Goals

In early 2020 HACSB updated its long-term goals through a strategic planning process. The resulting agency-wide strategic plan includes five main strategies that guide our work:

Strategy #1

Partners are providing the resources that our families need to prosper through financial contributions and/or in-kind services.

Strategy #2

Our families are proud of the safe, dignified, and desirable developments in which they reside.

Strategy #3

Research and technology that drive the creation of innovative programming and processes that are moving our families forward.

Strategy #4

Our customers are receiving quality, kind, and compassionate service.

Strategy #5

We have a healthy organization marked by financial stability and a culture of respect, stewardship, empowerment, and passion for the mission.

The flexibilities provided through our MTW designation assist in our efforts to achieve our long-term goals, and our strategic plan aligns with the statutory objectives of the MTW program.

Short-Term Goals

Our short-term goals are designed to help us achieve progress toward achieving and sustaining our long-term goals:

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.

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.

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 six MTW activities that address this goal.

II. 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 the Continuum of Care (formerly known as Shelter Plus Care), Veterans Administration Supportive Housing (VASH) vouchers, Mainstream, and our authority-owned multi-family 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 applied to the U.S. Department of Housing and Urban Development (HUD) for the voluntary transfer of UHA's Housing Choice Voucher 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 process 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 and began providing all services to the families served through those programs. Information about the transferred units and families and how HACSB's moving to Work initiatives apply to those units and families is included in this Plan. HACSB intends to convert the Public Housing site, Los Olivos, to project-based voucher assistance through the Rental Assistance Demonstration (RAD) program. Additionally, in May 2021 HACSB was allocated 455 new vouchers under the new Emergency Housing Voucher (EHV) program. This new rental assistance program, which was created through the American Rescue Plan Act (ARPA) of 2021, helps families locate rental housing and provides financial assistance to make their rent affordable. 70,000 Emergency Housing Vouchers will be administered by Housing Authorities across the country. ARPA authorizes the EHV program and related funding through September 30, 2030. Housing authorities are not permitted to re-issue Emergency Housing Vouchers after September 30, 2023.

The EHV program will provide assistance to low-income families who meet at least one of the following eligibility categories:

1. Homeless;
2. At risk of being homeless;
3. Fleeing or attempting to flee:
 - a. Domestic Violence;
 - b. Dating Violence;
 - c. Sexual Assault;
 - d. Stalking; and/or
 - e. Human Trafficking

4. Recently homeless, and for whom rental assistance will prevent a return to homelessness or high risk of housing instability.

EHV is a referral-based program, and eligible families must be referred to HACSB either through the San Bernardino County Coordinated Entry System (CES) or by a victim services provider (VSP) who is not a member of the County's Continuum of Care (COC).

HACSB launched the EHV program in San Bernardino County on October 4, 2021, and has received 280 EHV referrals as of November 4, 2021. More information about EHV is available on HACSB's website at <https://hacsb.com/emergency-housing-vouchers/>.

As noted in Section I – Introduction, HACSB has been granted waiver authority to apply certain MTW activities to the EHV program. More information about the applicability of HACSB MTW activities to the EHV program is included in Section IV – Approved Activities.

A. Housing Stock Information

i. Planned New Public Housing Units

HACSB does not plan to add any new Public Housing units in FY 2021-2022.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE	# OF UNIFORM FEDERAL ACCESSIBILITY STANDARDS (UFAS) UNITS	
	0/1	2	3	4	5	6+			FULLY ACCESSIBLE	ADAPTABLE
N/A							0			
Total Public Housing Units to be Added in the Plan Year							0			

ii. Planned Public Housing Units to be Removed

HACSB has received approval under HUD's Rental Assistance Demonstration (RAD) program to convert our entire Public Housing portfolio. As of FY 2021, only one Public Housing development and one single-family home remain. All other units scheduled for RAD conversion have been converted to Project Based Voucher units. The Los Olivos Public Housing site in Upland will be converted through the RAD program in FYE 2022.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
Los Olivos, Upland	98	RAD Conversion (estimated closing January 2022)
Total Public Housing Units to be Removed in the Plan Year	98	

iii. Planned New Project-Based Vouchers

HACSB does not plan to award any new project-based vouchers in FY 2021-2022.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
---------------	--	------	------------------------

Arrowhead Grove – Phase III	46	No	Original PH Development, New Construction
Los Olivos, Upland	98	Yes	RAD Conversion, Existing Public Housing Community
Planned Total Vouchers to be Newly Project-Based	144		

iv. Planned Existing Project-Based Vouchers

This table shows the project-based vouchers, including Rental Assistance Demonstration (RAD) project-based vouchers that are anticipated to be in place at the end of FYE 2022. This table includes project-based vouchers that have been awarded (committed) or are leased/issued.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Barstow (AMP 7)	217	Committed	Yes	RAD Conversion, Existing Public Housing Community
Colton/Chino (AMP 6)	174	Committed	Yes	RAD Conversion, Existing Public Housing Community
Maplewood Homes	296	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Redlands/Highland (AMP 5)	87	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Scattered Sites (AMP 2)	97	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Scattered Sites (AMP 3)	34	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Waterman Gardens Phase 1 - Valencia Vista	75	Leased/Issued	Yes	Family Community, New Development
Waterman Gardens Phase 2 - Olive Meadow	61	Leased/Issued	Yes	Family Community, New Development
Waterman Gardens Phase 3 – Crestview Terrace	116	Committed	Yes	Family Community, Existing Development
Andalusia	17	Leased/Issued	No	Family Community, Existing Development
Arrowhead Woods	51	Leased/Issued	No	Senior Community, Existing Development
Bloomington (Related Phase I)	11	Leased/Issued	No	Family & Senior Community, New Development
Bloomington (Related Phase II)	20	Leased/Issued	No	Family Community, New Development
Bloomington (Related Phase III)	20	Committed	No	Family Community, New Development
Dante Street, Victorville	12	Committed	No	Family Community, Existing Development

Day Creek Villas, Rancho Cucamonga	8	Leased/Issued	No	Senior Community, New Development
Desert Haven (Queens Motel), Victorville	31	Committed	No	Chronically Homeless, Existing Development
Desert Village	46	Leased/Issued	No	Senior Community, Existing Development
Golden Apartments, San Bernardino	38	Leased/Issued	No	Chronically Homeless, Existing Development
Grandview Towers	40	Leased/Issued	No	Senior Community, Existing Development
Horizons at Yucaipa	50	Leased/Issued	No	Senior Community, New Development
Horizons at Yucaipa – Phase II	27	Committed	No	Senior Community, New Development
Ivy at College Park, Chino	8	Leased/Issued	No	Family Community, New Development
Las Terrazas Apartments, Colton	9	Committed	No	Family Community, Existing Development
Meadowbrook	47	Leased/Issued	No	Senior Community, Existing Development
Mentone Clusters	34	Leased/Issued	No	Family Community, Existing Development
NCLU- Scattered Sites (HACSB)	26	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites (HPI)	10	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites (Summit Place)	4	Leased/Issued	No	Project-Based Voucher Program
Redwood Terrace	68	Leased/Issued	No	Senior Community, Existing Development
Rialto Metrolink, Rialto	8	Committed	No	Family Community, New Development
Robert O Townsend	47	Leased/Issued	No	Senior Community, Existing Development
Rosina Fountains, Fontana	8	Leased/Issued	No	Family Community, New Development
Scattered Site Units	229	Leased/Issued	No	Family Community, Existing Development (HPI)
Scattered Site Units	79	Leased/Issued	No	Family Community, Existing Development (HPI)
Sunrise Vista	108	Leased/Issued	No	Family Community, Existing Development
Sunset Pointe	117	Leased/Issued	No	Family Community, Existing Development
Valencia Grove, Redlands (Phase I)	85	Leased/Issued	No	Family Community, New Development
Valencia Grove, Redlands (Phase II)	104	Committed	No	Family Community, New Development
Veterans' Housing, Loma Linda	36	Committed	No	Veterans' Housing, New Development

Veterans' Housing, Various Sites	40	Committed	No	Veterans' Housing, Scattered Sites
Vista del Sol	53	Leased/Issued	No	Senior Community, Existing Development
Yucaipa Crest	45	Leased/Issued	No	Senior Community, Existing Development
Yucaipa Terrace	50	Leased/Issued	No	Senior Community, Existing Development
Total	2,743			

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

At the time of this writing, HACSB is in discussion with the HUD RAD team regarding a possible post-conversion transfer of assistance for units located at HACSB's 7th Street development in Barstow. This development was previously converted from Public Housing to project-based vouchers through the RAD program. If the proposed post-conversion transfer of assistance is approved and processed, these units would no longer be RAD units. More information will be provided as it is available.

vi. General Description of All Planned Capital Expenditures

2020 marked the conclusion of our original portfolio RAD conversion strategy (and subsequent physical rehabilitation) for the entirety of HACSB's 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 closed at the end of April 2016, converting 552 units in 4 different AMPS. Capital fund was utilized to complete work identified under the RAD Physical Needs Assessments, and was 100% complete as of January 2018.

The second phase of the RAD portfolio transaction included conversion of 354 remaining units in 3 different AMPS. The RAD Conversion transaction for the second phase closed in September 2018, whereupon rehab work identified under the RAD Physical Needs Assessments commenced with a targeted completion by the end of 2019. Additionally, staff re-analyzed the physical renovations planned for Barstow public housing (AMP 170) and is implementing changes to the project to achieve a higher level of physical rehabilitation along with other measures to ensure long-term viability of the site(s). For example, the 7th Street site will now be converted via a transfer of assistance to a newer apartment complex in Barstow owned by the Housing Authority while the former public housing units will become available for homeownership. The COVID-19 Pandemic caused physical rehabilitation work funded with Capital Fund to be extended into 2021 with completion expected before the end of the year.

Construction of the initial on-site phase (62 units) of the Waterman Gardens revitalization project (the second RAD conversion project) broke ground in May 2016 and was completed and occupied as of September, 2017. The new community, now called Arrowhead Grove, will eventually include over 400 mixed-income housing units as well as 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 Valencia Vista (aka Val9) Apartments on

an adjacent site (completed and occupied in 2016). HACSB and its developer partner have planned a mix of RAD and project-based voucher units with substantial funding secured through Low Income Housing Tax Credits. The existing 252 ACC units are being replaced on a one-for-one basis (transitioned to RAD project-based vouchers) over the course of the multiple-phase redevelopment. The second on-site phase (184 units) received allocations of low income housing tax credits and tax exempt bonds along with a \$20 million dollar infusion of state of California Affordable Housing and Sustainable Communities (AHSC) program funds by the end of 2018. The very complex financial transaction enabling construction to commence closed on September 30, 2019. It included the RAD closing, HACSB's issuance of \$55 million in tax exempt bonds, a tax credit closing funding nearly \$15 million in equity, and approximately \$10 million in state and local funding to bring construction sources to approximately \$80 million. This funding enabled construction to start in October-2019 for the final phase of the RAD conversion project at Waterman Gardens. A phased occupancy of units commences in May, 2021 and overall construction is expected to be completed in the Fall.

In 2021 we are continuing pre-development work (finalizing preparation of construction documents), for the second phase of construction (104 family rental units) at the Redlands-Lugonia site (AMP 150, sites 01, 8, & 9), with an eye on commencing construction by the end of the year.

FY 2021:

The Capital Fund Program 5-Year Plan and Budget is included as Appendix E. Capital Fund available for physical improvements at Public Housing sites has been substantially reduced due to the conversion of subsidy for the entirety of HACSB's original public housing portfolio to vouchers under the RAD program. The majority of HACSB's original Public Housing units converted under RAD at the end of September, 2018. The last site remaining for conversion after that was the 98-unit Los Olivos site which was acquired by HACSB through the transfer of the Upland Housing Authority's public housing and voucher programs. This site was anticipated to close under RAD in August, 2019. However, staff paused the transaction to thoroughly analyze the potential benefit of transitioning the site through Section 22 Streamlined Voluntary Conversion pursuant to HUD PIH Notice 2019-05. Ultimately, it was determined that it is in the best interest of the Authority and the residents to convert under the normal RAD process. We expect that conversion process to be completed during 2021. Utilizing Capital Fund, in 2021 HACSB continues to complete capital improvements identified under the site's physical needs assessments to ensure that the units will continue to meet the needs of residents of Upland 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 add 104 units of affordable family rental housing to the site to compliment the 85 units completed in 2016. We are utilizing accumulated (first 5-year increment) Replacement Housing Factor (RHF) funds in excess of \$3 million to support construction. Likewise, the third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) commenced construction in the Fall of 2019, adding approximately 182 affordable family rental units plus 2 manager's units to complete the one-for-one replacement of Public Housing units formerly located there while also adding market rate units to create a mixed-income community. We are utilizing Demolition/Disposition Transition

Fund (DDTF) leveraged with state and local funding and Low Income Housing Tax Credits (LIHTC) to support this effort, which is expected to be completed by Fall of 2021.

B. Leasing Information

i. Planned Number of Households Served

The following table presents projected voucher utilization for MTW vouchers and Public Housing occupancy for the Public Housing units at the end of FY 2022. In FY 2022 HACSB's remaining Public Housing units will 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.

HAP expenses have risen over the previous several years and are expected to increase further in FYE 2022. Due to a higher-than-expected inflation factor applied to Calendar Year 2021 funding, HACSB is undertaking enhanced leasing efforts in FYE 2021 and 2022.

The MTW Public Housing units anticipated to be leased include 98 units at the Los Olivos development which are expected to be converted out of Public Housing through RAD in January 2022 (294 unit months). In addition, one single-family home in AMP 180 comprises 12 unit-months. A total of 99 families are expected to be served through Public Housing during FY 2021; however, in accordance with instructions for HUD Form 50900, the number of families anticipated to be served reported in this Plan is calculated as the total unit months for the year (306) divided by twelve months. This Plan indicates that 26 families are anticipated to be served through Public Housing during the year.

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
MTW Public Housing Units Leased	306	25
MTW Housing Choice Voucher (HCV) Utilized	115,671	9,639
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	115,977	9,664

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
Tenant-Based	N/A	0	0
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None.
MTW Housing Choice Voucher	Vacancy rates throughout the county remain low, ranging from 2% to 4%. HACSB continues to provide families with the maximum allowable search time. Additionally, HACSB is in the process of implementing a landlord incentive program to encourage participation by landlords and open additional units to participant families.
Local, Non-Traditional	N/A.

C. Waiting List Information

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. This duplication is described in the following tables.

HACSB anticipates that community need for affordable housing will remain high in FYE 2022. The following table shows the projected number of households on wait lists for Public Housing units and vouchers as of the beginning of FYE 2022. HACSB does not currently envision organizational or policy changes to wait lists.

Housing Choice Vouchers

HACSB maintains a single tenant-based voucher wait list. The list was most recently opened for 19 days in February 2019; 21,862 applications were received. The opening was conducted through our online wait list portal, and a call center was available to assist customers with their questions and to respond to requests for reasonable accommodations. We do not anticipate re-opening the tenant-based voucher wait list in FYE 2022.

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/RAD communities. All wait lists under this program are maintained centrally to maximize efficiencies and housing choice.

HACSB's application for conversion of a large portion of its portfolio under the Rental Assistance Demonstration (RAD) program was approved in December 2014, and the process of converting all sites is expected to be complete in calendar year 2020. 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.

i. Waiting List Information Anticipated

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Centrally managed, site-specific, by bedroom size	1,565	Closed	Yes, by bedroom size as needed
Rental Assistance Demonstration Sites - PBV	Centrally managed, site-specific, by bedroom size	33,306	Partially open	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	29,132	Partially open	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	20,300	Closed	No

DESCRIPTION OF DUPLICATION OF APPLICANTS ACROSS WAITING LISTS

41% of applications are duplicates, representing families who have applied to two or more waiting lists. There are 53,429 unduplicated families on HACSB's waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Rental Assistance Demonstration Sites – PBV	Possible review and update of all RAD waiting list for active and interested applicants.
Housing Choice Voucher – Tenant-Based	The waiting list may be opened at the end of the fiscal year 2022. Major leasing for Tenant-Based Voucher and Mainstream programs during fiscal years 2021 and 2022 may deplete the existing waiting list.

III. Proposed Activities

Activity 28: Landlord Incentives

a. Activity Description

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

To help assisted families successfully lease rental units available on the private market, HACSB intends to implement a landlord incentives activity. This activity will provide incentive to property owners to lease to families participating in a HACSB MTW voucher program by offsetting some of the administrative and financial impacts of leasing to assisted families. Our most recent third-party rental market analysis showed that vacancy rates are very low (2-4%) throughout San Bernardino County, and families report difficulty locating suitable units and successfully leasing those units. HACSB anticipates that this activity will increase landlord participation and expand housing choice for voucher families.

Signing Bonus

Through this activity, HACSB will provide a one-time \$1,000 signing bonus for each new HAP Contract signed after the program goes into effect. HACSB has established the following criteria for the incentive:

- The assisted unit must be located in HACSB's service area which is the entire County of San Bernardino excluding the City of Needles.
- Voucher holder must be a new program participant or existing program participant who is new to the rental property.
- Executed lease and contract with all required addendums will be required before the signing bonus will be made.

The following properties are not eligible for the signing bonus:

- Tax credit properties
- Units under a project-based voucher (PBV) HAP contract
- HACSB and HACSB affiliate owned units

The following situations do not qualify for a signing bonus:

- An existing program participant is signing a new lease to remain in their current subsidized unit.
- An existing voucher participant is moving from one unit to another in the same apartment complex, such as a tenant moving from upstairs to downstairs.

HACSB may also implement other components of this activity, such as tenant damage mitigation fund and/or a tenant education program. All components of this activity are subject to availability of funding.

b. Activity Metrics Information

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

- **Local Metric: Average Number of Days from Voucher Issuance to Lease Start**
HACSB will compare the baseline (pre-implementation) and post-implementation number of days from voucher issuance to lease start to help determine if the activity is shortening the search time for voucher holders.
- **Local Metric: Successful Lease Rate**
HACSB will compare the baseline (pre-implementation) and post-implementation percentages of voucher holders who successfully lease a unit to help determine if the activity is improving voucher holders' ability to lease a unit.

c. Cost Implications

HACSB anticipates that this activity will result in modest cost increases as voucher holders lease units. The costs associated with this activity will vary with the number of families who enter into leases with new landlords. However, these costs will be partially offset by savings achieved through other MTW activities such as the Local Payment Standards activity. HACSB anticipates that the cost for FYE 2022 will not exceed \$600,000. However, the actual cost may be higher or lower depending on market conditions such as availability of units and competition for units, as well as the success of this activity in incentivizing landlord participation. HACSB intends to use single-fund flexibility to support this activity, which is greatly needed to help families successfully lease units.

d. Need/Justification for the Activity

This activity will allow HACSB to provide incentive to landlords to lease to low-income families assisted through HACSB MTW voucher programs, helping to offset the challenges of a very low vacancy rate and extremely competitive rental market.

HACSB requests authority to waive the following statutes and regulations to undertake this proposed activity:

- HACSB MTW Agreement, Attachment C, Section B.1. (Single Fund Budget with Full Flexibility);
- HACSB MTW Agreement, Attachment C, Section D.1.a. (Use of HUD-Required Contracts and Other Forms);
- HACSB MTW Agreement, Attachment C, Section D.1.d (Damage Claim and/or Vacancy Loss Payments);
- Other statutes and regulations waived under previously approved and currently active HACSB MTW activities.

These authorizations will permit HACSB to:

- Provide incentives to landlords to lease to families assisted through HACSB MTW voucher programs.

IV. Approved Activities

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 4: Biennial and Triennial Recertifications

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial approval 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.
- FY 2012: Modified to expand the scope of the activity to apply to all families in both 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.
- FY 2014: The first complete cycle of biennial certifications was completed in 2014.
- FY 2019: Modified to add triennial recertifications for elderly-only fixed-income families. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021 through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.

ii. Description/Update

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

Current regulations require annual income recertifications for most participants of the Public Housing and Housing Choice Voucher programs. This MTW activity allows HACSB to conduct recertifications of MTW, EHV and VASH households biennially or triennially. Elderly-only fixed-income families are recertified triennially; all other families are recertified biennially. Triennial recertifications for elderly-only fixed-income families began in September of 2019, with triennial recertifications for VASH families beginning in May 2020. EHV participants can request interim recertifications, should the household experience an income reduction. Referrals will be accepted from the County of San Bernardino's Coordinated Entry System or another partner agency beginning October 2021.

Biennial/Triennial Recertification Process

- HACSB will perform a full recertification to examine family income and composition once every three years for elderly-only fixed-income families, and once every two years for all other families. No PHA-initiated updates will take place during the years between full recertifications.
 - An elderly-only fixed-income family is defined as having no members under the age of 57 AND having at least 90 percent of its income from fixed sources.

- This activity modifies the recertification schedule only. Families will continue to be subject to the interim reporting requirements, calculation of income and rent, and other components of their assigned program type (Term-Limited Lease Assistance, Streamlined Lease Assistance, etc.)

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations change for this activity:

- HACSB will extend the validity of a family’s most recently completed biennial or triennial recertification by one year. The due date of the family’s next biennial or triennial recertification will be one year from the original due date, and future recertifications will follow the biennial/triennial schedule (taking place two/three years from the date of the extended recertification).

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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 MTW 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.

v. Planned Significant Changes

None.

Activity 5: Simplified Income Determination

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial approval as “Local Verification Policies”. Implemented on October 1, 2009.
- FY 2019: Modified to rename this activity and merge the functions of the following previously approved activities:
 - Activity 5 – Local Verification Policies (the original name of this activity)
 - Activity 6 – Elimination of Assets: Originally approved in our FY 2009 Annual MTW Plan and implemented on October 1, 2009. This component was closed out as a separate activity in FY 2019.
 - Activity 9 – Elimination of Earned Income Disallowance: Originally approved in our FY 2009 Initial Annual MTW Plan and effective on October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs. This component was closed out as a separate activity in FY 2019.
 - Activity 17 – Local Income Inclusions: Originally approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. The activity was modified through HACSB’s FY 2015 Annual MTW Plan. This component was closed out as a separate activity in FY 2019.
- Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. All components of this activity except the elimination of the Earned Income Disallowance apply to VASH households.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, is included in our Annual MTW Plan for informational purposes. This activity applies to EHV customers with the exception of the exclusion of Earned Income Disallowance.

ii. Description/Update

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

This activity includes four components: local verification policies, elimination of assets, elimination of the Earned Income Disallowance, and local policies for income inclusions and exclusions. All components of the activity, except the elimination of the Earned Income Disallowance component, apply to EHV and VASH households.

This activity has simplified the process for our families and the housing staff, reducing staff time spent on verifications, calculation of assets, processing the Earned Income Disallowance, and related agency costs.

Verification Policies

The verification standard used by HACSB was modified in FY 2011 to establish the following local 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.

Applicant verifications may not be more than 120 days old (from the date received) at the time of orientation. For participants, verifications remain valid for six months (180 days) from the date received.

Elimination of Assets

Assets are fully excluded from the calculation of annual income for the purpose of determining the tenant rent portion. Asset information is verified at initial eligibility for the purpose of determining income eligibility for assistance. Thereafter, information related to assets is not collected and income from assets is not considered as part of the income/rent calculation formula.

Elimination of Earned Income Disallowance

HACSB has eliminated the HUD Mandatory Earned Income Disallowance (EID) from the calculation of total tenant payment. This component does not apply to VASH program participants.

Local Income Inclusions and Exclusions

HACSB has established local policies to include or exclude certain income sources that are currently excluded or included 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);
- 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).

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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
- CE #5: Increase in Tenant Rent Share

v. Planned Significant Changes

None.

Activity 8: Local Policies for Portability

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The initial implementation of this activity began on October 1, 2009.
- FY 2010: Modified to add a work requirement for portability. The work requirement was implemented on August 1, 2010.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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

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

This activity has resulted in significant staff time savings, achieving a reduction in staff hours to process ports-in each year since implementation. All benchmarks for this activity have been fully or partially met since FY 2010.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations change for this activity:

- HACSB temporarily suspended acceptance of Housing Choice Voucher Program ports-in from other housing authorities. HACSB maintained a contact list of the families who expressed interest in porting to San Bernardino County during the temporary suspension and those families were notified when the suspension was lifted effective December 1, 2020.

Emergency operations for this activity were ended December 1, 2020 but remain in effect for other activities. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

None.

Activity 10: Minimum Rent

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The activity was implemented on October 1, 2009, for recertifications of currently served families and on January 1, 2010, for all new families.
- FY 2019: A non-significant modification was made to require families paying the minimum rent to participate in supportive services offered by HACSB. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, is included in our Annual MTW Plan for informational purposes.

ii. Description/Update

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

This activity allows 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. The activity applies to MTW, EHV and VASH households.

This activity allows HACSB to apply a minimum rent that differs from the regulatory minimum rent.

Supportive Services Requirement

This activity also permits HACSB to require career-able (non-elderly and non-disabled) families paying the minimum rent to participate in services offered through HACSB's Family Empowerment Services (FES) team. The Head of Household will be required to sign an individual training and services plan (ITSP) with the primary objective of increasing the family's earned income. This component was approved in HACSB's FY 2019 Annual MTW Plan. However, implementation of this requirement is on hold due to staffing and structural changes within the FES team.

iii. Planned Non-Significant Changes

The minimum rent may be reduced or postponed for HACSB developments or programs serving extremely vulnerable populations. For example, HACSB will reduce the minimum rent for all families residing at the Desert Haven and Golden Apartments permanent supportive housing sites for homeless and chronically homeless individuals and families to \$0. The family will pay the applicable Streamlined Lease Assistance (MTW Activity 22) rent, with a minimum rent of \$0.

iv. Planned Changes to Metrics/Data Collection

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.

v. Planned Significant Changes

None.

Activity 11: Local Project-Based Voucher Program

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2010: Clarified components of the activity through FY 2010 Annual MTW Plan, Amendment 3. Implemented September 2010.
- FY 2015: Modification proposed through our FY 2015 Plan, Amendment 1B, but not approved by HUD. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 MTW Plan.
- FY 2018: Modification to expand unit types eligible for project-based vouchers and add a work and/or supportive services requirement.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. A modification to allow HACSB to apply alternative occupancy standards in special circumstances was included in our FY 2019 Annual MTW Plan, Amendment 1.

ii. Description/Update

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

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:

- Project-based assistance at properties owned by HACSB or an affiliate of HACSB that are not Public Housing;
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest that meet existing Housing Quality Standards or any standards developed by HACSB through a MTW activity, and that are owned by non-profit and for-profit housing entities;
- Alternate standards for determining the location of existing, newly constructed, or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement;
- Up to 100% percent of units in any development may be project-based;
- Up to 30% (including RAD-PBV units) of HACSB's total MTW baseline number of units may be allocated for PBV;
- PBV will be allocated to all Public Housing units approved for disposition other than 27 Shelter Plus Care 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 (this component does not apply to RAD PBV households);

- 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;
- HACSB will project-base assistance at properties owned by HACSB or HACSB affiliate that are not Public Housing without a competitive process;
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest, and that are owned by non-profit and/or for-profit housing entities. Such units must meet existing Housing Quality Standards (HQS) or HACSB-local HQS.
- Alternate standards for determining the location of existing newly constructed or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement;
- 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 wrong-sized 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. This flexibility is applied to the first two phases of the Waterman Gardens public housing revitalization project, where 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. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three.)
- The rents for Rental Assistance Demonstration (RAD) units will equal the maximum specified under the RAD Notice. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three.)
- 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 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.

Additional Requirements

Our approved FY 2018 Annual MTW Plan included the addition of a requirement for the PBV project developer/manager to administer a work requirement and/or supportive services program for some new project-based voucher (PBV) contract awards. This component has not yet been implemented for any PBV site, but HACSB anticipates that it will be used for future PBV awards.

The work and/or supportive services 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.

iii. Planned Non-Significant Changes

HACSB intends to allow all project-based voucher (PBV) units included under a single contract to be grouped as a single building for the purpose of determining the number of inspections to be performed. Currently, regulations require that 20% of the units in each building in a project be inspected annually or biennially. For scattered site projects and those that include multiple buildings on one site, the inspection requirement results in HACSB inspecting more than 20% of the total units under PBV contract. For example, a PBV contract that includes ten duplex buildings (20 total PBV units) would currently require one inspection per duplex (ten inspections). Under this modification, HACSB would instead inspect 20% of the 20 total units (4 inspections).

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

None.

Activity 12: Local Payment Standards and Alternative Flat Rents

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2011: Implemented on July 1, 2011 for all new lease ups and recertifications
- FY 2012: Modified to use the maximum subsidy as determined through HACSB's annual market rent study as the guideline in determining the contract rent for voucher units.
- FY 2015: Modification 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 Annual MTW Plan.
- FY 2017: Modified to apply Local Payment Standards as the maximum flat rent for Public Housing units.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, is included in our FY 2022 Annual MTW Plan for informational purposes.

ii. Description/Update

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

The activity applies to MTW, EHV and VASH households.

This MTW activity allows HACSB to conduct a market assessment to identify submarket areas and develop Local Payment Standards for those submarket areas in lieu of the HUD-prescribed Fair Market Rents. The resulting Local Payment Standards accurately reflect the diverse rental submarkets that exist across the geographically vast and diverse San Bernardino County.

Our FY 2017 Annual MTW Plan expanded the use of Local Payment Standards to replace the HUD-published 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 are used to determine 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 the Local Payment Standards indicates an increase or decrease of more than 10% from the current rate, the 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.

Since implementation, this activity has shown a significant improvement in the number of families able to move to areas of opportunity. We have 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. 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 the number of families relocating to areas of greater opportunity will continue as a result of this activity.

This activity has encouraged deconcentration and resulted in more HCV households locating units in areas of opportunity. To eliminate barriers for EHV participants, we will use a combination of HACSB Local Payment Standards and Payment Standards for traditional regulatory assistance for EHV participants. HACSB will group nine Local Payment Standard submarkets into three regions. Generally, payment standards for EHV are set between 90 – 120% of Fair Market Rents. However, if any of the MTW payment standards within the region exceed 120% of FMR, we are requesting HUD approval to apply the highest MTW submarket payment standard to the entire region.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations change for this activity:

- The annual review and update to the Local Payment Standards was delayed due to the limited availability of a third-party consultant to perform the market assessment. Additionally, the availability of market data for vacant units was limited by the extremely low vacancy rates, which ranged from two to four percent in different areas of the County. The Local Payment Standards were updated effective March 1, 2021.

Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will continue to 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 Concentrationv. Planned Significant Changes

None.

Activity 13: Local Inspection Policies

i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval. Implemented on May 1, 2011.
- FY 2015: Modified to expand biennial inspections to all MTW units
- FY 2016 and FY 2017: Expanded biennial inspections implemented across all MTW units.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, is included in our Annual MTW Plan for informational purposes.

ii. Description/Update

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

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. All MTW, VASH, and EHV units are inspected biennially through this activity.

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. We anticipate that the cost and time savings will continue in future years.

A modification to this activity was approved via our FY 2015 Annual MTW Plan. The percentage of units that met our quality standards to qualify for biennial inspections was well above the expected outcome. As a result, the property rating system used to determine the frequency of inspections for each unit was eliminated. Assisted units that were previously inspected annually were moved to a biennial inspection schedule, with 50% of those units inspected in FY 2016 and the remaining 50% inspected in FY 2017. No change was made to HACSB's enhanced local inspection standards.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against

the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations changes for this activity:

- HACSB extended the validity of a family’s most recently completed biennial HQS inspection by one year. The due date of the family’s next biennial HQS inspection was reset to one year from the original due date.
- HACSB deferred in-person initial HQS inspections. While this modification was in place, HACSB accepted self-certification by the family and property owner/manager that the unit met all HQS requirements in order to allow the family to move in without delay. In some circumstances, HACSB required photographs to accompany the self-certification for some HQS components. Inspections were resumed effective March 15, 2021, and HACSB will conduct an in-person HQS inspection to confirm that units meets HQS requirements. Deferred initial HQS inspections are prioritized for processing. In the event that the unit does not pass the in-person HQS inspection, HACSB will follow the same policies and procedures applicable to failed biennial inspections.

Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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.

v. Planned Significant Changes

None.

Activity 14: Local Asset Management Program

i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval.

ii. Description/Update

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

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 the appendices to this Plan.

HACSB intends to sunset use of the LAMP after the Los Olivos Public Housing site is converted through the HUD Rental Assistance Demonstration (RAD) program.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

None.

v. Planned Significant Changes

None.

Activity 18: Property Management Innovation

i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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

This activity allowed HACSB to develop a property management innovation program that reflects private sector property management principles. This activity applies to all Public Housing units, including units converted under the Rental Assistance Demonstration (RAD) program. The objective is to implement policies 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 through our FY 2011 plan:

- a. 3-Day Notice to Pay or Quit (previous policy was 14 days). This component was eliminated due to the RAD conversion of our Public Housing portfolio.
- 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. This component was eliminated due to the RAD conversion of our Public Housing portfolio.

The activity has resulted in cost savings and administrative efficiencies gained from the streamlined grievance process as well as the reduction in arbitration costs.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations change for this activity:

- HACSB will use remote meeting options whenever possible for actions within this activity which require a meeting between HACSB employees and assisted families, such as the modified grievance process (settlement conference).

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

None.

Activity 19: Local Family Self-Sufficiency Program

i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on July 1, 2012.

ii. Description/Update

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.

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. Families may also withdraw a portion of their FSS escrow savings balance during participation in the Local FSS program for certain self-sufficiency-related activities.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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.

v. Planned Significant Changes

None.

Activity 20: Term-Limited Lease Assistance

i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012. Note: This activity was originally proposed as activity 21 under the title “Term Limits”. It was renumbered as activity 20 with our FY 2012 Plan.
- FY 2013: Renamed from “Term Limits” to “Five-Year Lease Assistance.”
- FY 2015: Modified to include potential termination from the program for noncompliance with the household’s Supportive Services Agreement.
- FY 2016: Modified to include an intake hardship exemption for extremely low-income and Triage Step 3 households and to expand the end-of-term hardship exemption. This modification was not implemented.
- FY 2017: Modified to include income-based subsidy calculation for new families joining the program, requirement for families to lease a unit with no more than one bedroom more or less than their voucher size, a post-assistance tracking survey process, approval to implement incentives for families to move to areas of opportunity, and expanded applicability to include career-able ports-in, project-based families exercising mobility, and non-legacy RAD families exercising mobility.
- FY 2018: Modified to include right-size unit restriction, limitation on the approvable amount of rent increases, and a limitation on the amount of subsidy paid on behalf of over-housed families. Title changed to Term-Limited Lease Assistance.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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.

The goal of this 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. Families served through this activity are provided with up to five years of housing assistance and supportive services, with the possibility for extension through a hardship exception that may provide up to two years of additional assistance.

This activity applies to 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 sites. Currently assisted families who are selected from the wait list during their term of participation in the program may continue their current term of participation, but will not be provided a new or extended term of assistance. In such circumstances, the application will be removed from the wait list.

The activity is now in its tenth year. Since implementation, 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. The study has included more than 2,300 families to date and reports positive outcomes, including:

- Earned income for families in the program increases by an average of 45.5% during their five-year term of assistance, and the number of families with earned income nearly doubles from 48% at the start of the five-year term to 86% by the fifth year;
- Full-time employment increased by 25%;
- Families' assistance income tends to decrease in the second year of the program, but is quickly replaced by increased earned income.

We will continue to work with our Loma Linda University partners to evaluate the families' progress and challenges as well as residual impacts the program has on families after they exit housing assistance.

Subsidy Calculation:

Families participating in the activity before November 1, 2017: the housing subsidy is set at 50% of the applicable payment standard for the unit selected by the family.

Families joining the activity on or after November 1, 2017: the subsidy calculation mirrors the Streamlined Fixed Assistance Program for New Non-Elderly/Non-Disabled Households. Under that calculation, the family's rent share is the greatest of 30% of their gross income, the minimum rent, or baseline rent, for the duration of assistance.

Subsidy Limitation:

This component has not been implemented as of May 2021. HACSB is authorized to apply a subsidy limitation to families participating in the TLA activity. 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 will apply a subsidy limitation to over-housed families. Over-housed families are those who have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher who has chosen 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.

HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families.

Supportive Services:

During the term of assistance, HACSB also provides supportive services to the family through its Family Empowerment Services (FES) department (formerly known as Career Development Initiatives). Families are required to meet with their FES caseworker at least annually to review their action plan and progress. Services provided to families through the FES team include:

- Needs assessment at intake to identify barriers and areas of need, such as education, job training, childcare, transportation, and other areas;
- Development of an individualized action plan to overcome barriers and needs as identified;
- Access to a Family Stabilization Specialist and Employment Services Specialist through HACSB's partnership with the San Bernardino County Transitional Assistance (welfare) Department;
- Access to other resources designed to provide the family with meaningful support and tools to enhance the family's chances for success.

Mobility:

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.

Hardship Exemptions:

HACSB recognizes that the expiration of assistance may present a hardship for some families, and has developed hardship exemptions in four categories:

- **Completion of Self-Sufficiency Activity:** to allow the family to complete an educational, job training, or other approved self-sufficiency activity.
- **Unforeseen and Involuntary Loss of Income**
- **Near-Elderly Family:** if the head of household will reach age 62 no later than six (6) months after the end of term or any applicable extension, the household may request a transfer to HACSB's Streamlined Lease Assistance for Elderly/Disabled Families.
- **Other Reasons:** this category allows HACSB to approve an extension of assistance for rare or unusual circumstances, such as PHA error.

To be eligible for a hardship exemption, the family must have complied with all requirements of the program, including the Supportive Services Agreement. 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. Note: This total term limit may be exceeded for families whose end of term was scheduled to take place between April 1, 2020 and September 30, 2020 and who received an automatic six-month extension of assistance through HACSB's emergency operations in response to the COVID-19 pandemic.

Unit Size Limitation:

Beginning July 1, 2021, households admitted to or moving to a new unit under the Term-Limited Assistance (TLA) Program must select a unit whose number of bedrooms is not greater than their voucher size. For example, a family with a two-bedroom voucher may not lease a three-bedroom or larger unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed families are also more costly to house than families in right-sized units.

Incentive to Move to Areas of High Opportunity:

HACSB may 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:

HACSB has partnered with Loma Linda University (LLU) to evaluate Term-Limited Lease Assistance families at exit and annually for two years after assistance has concluded. Information is collected through a questionnaire that is returned directly to LLU. Although participation in the survey is voluntary, a monetary incentive is provided for families completing the survey. Families receive the incentive payment only upon completion of each survey. Feedback obtained through the exit study helps HACSB to understand the family perspective and experience in the TLA program. The majority of families participating in the study reported a positive experience in the program and that participating was a resource to them on their pathway to self-sufficiency. Benefits noted by the families include the ability to save money, to stabilize their housing situation, and to experience social mobility. Families also provide helpful suggestions for improving the program, including increasing family accountability and supports available to families. In 2020, the study included questions about the impacts of the COVID-19 pandemic on participant families. Just over one-third of families reported reduced hours, nearly 25% reported losing employment, and 36% reported reduced access to childcare resources. These impacts highlight the importance of housing assistance as a social safety net in times of crisis.

Rent Increase Limitation:

Through its 2018 Annual MTW Plan HACSB was granted authorization to 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, this component has not yet been implemented.

HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. As a result, HACSB has implemented the emergency operations changes for this activity:

- To the extent possible, HACSB will conduct annual meetings between TLA participants and their FES caseworker by telephone or using virtual meeting technology. If this is not possible, HACSB will defer the annual meetings until it is safe, feasible, and practical to conduct them in accordance with normal procedures;
- The end of term (EOT) for any TLA participant with an EOT scheduled to occur between April 1 and September 30, 2020, was delayed by six months.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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 #8: Households Transitioned to Self-Sufficiency

v. Planned Significant Changes

None.

Activity 22: Streamlined Lease Assistance

i. Plan Year Approved, Implemented, Amended

- FY 2013: Initial approval.
- FY 2015: Implemented February 1, 2015.
- FY 2016: Modified to add “Streamlined Fixed Lease Assistance for New Non-Elderly/Non-Disabled Households”.
- FY 2017: Modified to add a unit size limitation for tenant-based voucher programs.
- FY 2018: Modified the rent tiers for career-able families currently participating in the Streamlined Tiered Lease Assistance program from 21/24/27/30% to 30/33/36%.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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

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 current and new households, except those admitted to the Term-Limited Lease Assistance Program before November 1, 2017.

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

Fixed Assistance Program for Elderly/Disabled Households:

Families admitted prior to January 1, 2019: The family’s rent share (TTP) is the greatest of 24% of their gross income, the minimum rent, or baseline rent.

Families admitted on or after January 1, 2019: The family’s rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent. This component was implemented for new families briefed on or after January 1, 2019.

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

This component utilizes a tiered schedule to calculate the family rent share (TTP). Families enter at Tier 1 and move to the next tier at each subsequent biennial recertification.

Tier 1: The family's rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent.

Tier 2: The family's rent share is the greatest of 33% of their gross income, the HACSB minimum rent, or baseline rent.

Tier 3: The family's rent share is the greatest of 36% of their gross income, the HACSB minimum rent, or baseline rent.

The baseline rent for each family is the set at their highest family rent share during participation in this activity. Future rent amounts may never fall below the baseline rent without a hardship exemption. For example:

At Admission

Family Monthly Gross Income:	\$1,000
Tier 2 Calculated Rent (30%):	\$300 ← Family Rent Share
HACSB Minimum Rent:	\$125
Baseline Rent:	N/A

First Biennial Recertification

Family Monthly Gross Income:	\$900
Tier 2 Calculated Rent (33%):	\$297
HACSB Minimum Rent:	\$125
Baseline Rent (Highest Prev. Rent):	\$300 ← Family Rent Share

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.

This component previously utilized four rent tiers which set the family's rent share at 21%/24%/27%/30% of gross income, the minimum rent, or baseline rent. The rent tier structure was changed to the current three-tier structure through our FY 2018 Annual MTW Plan. Beginning February 1, 2018, all families were moved from their current tier to the new Tier 1 (30%) and received an automatic six-month hardship exemption which delayed any change in their rent portion. All families in the program at the time of the revision and those admitted since that time have remained at the 30% rent tier. 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.

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

Beginning July 1, 2021, households admitted to or moving to a new unit under this activity must select a unit whose number of bedrooms is not greater than their voucher size. For example, a family with a two-bedroom voucher may not lease a three-bedroom or larger unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed families are also more costly to house than families in right-sized units.

Subsidy Limitation:

This component is on hold and has not been implemented as of May 2021. HACSB is authorized to apply a subsidy limitation to families participating in the SLA activity. 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 component, 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.

HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families.

Rent Increase Limitation (voucher programs only):

This component is on hold and has not been implemented as of May 2021. HACSB is authorized to 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. Through this activity HACSB would cap the rent increase at a value less than 10% of the previous contract rent.

HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families.

Hardship Exemptions:

HACSB recognizes that the expiration of assistance may present a hardship for some families, and has developed hardship exemptions in four categories:

- **Completion of Self-Sufficiency Activity:** to allow the family to complete an educational, job training, or other approved self-sufficiency activity.
- **Unforeseen and Involuntary Loss of Income**
- **Near-Elderly Family:** if the head of household will reach age 62 no later than six (6) months after the end of term or any applicable extension, the household may request a transfer to HACSB's Streamlined Lease Assistance for Elderly/Disabled Families.
- **Other Reasons:** this category allows HACSB to approve an extension of assistance for rare or unusual circumstances, such as PHA error.

To be eligible for a hardship exemption, the family must have complied with all requirements of the program, including the Supportive Services Agreement. Any approved extension shall not exceed two years and shall be approved in increments of six or twelve months as determined by HACSB.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical.

These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. As a result, HACSB has implemented the following emergency operations changes for this activity:

- SLA families experiencing a significant loss of income due to the current crisis may be approved for a hardship exemption. This new hardship exemption category will follow the application, review, and approval policies and procedures currently in place for other hardship categories;
- Processing of interim recertifications (to the extent that HACSB processes interim recertifications for families served through the Moving To Work demonstration), with the exception of interims processed for an approved hardship exemption, will be deferred to the earliest practical and feasible date.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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
- 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

v. Planned Significant Changes

None.

Activity 23: No Child Left Unsheltered

i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial Approval through HACSB's FY 2014 Annual MTW Plan. Implemented on April 1, 2015.
- FY 2015: Modified to expand program eligibility criteria.
- FY 2018: Modified to add twenty tenant-based vouchers for the foster care component.
- FY 2019: Modified through HACSB's FY 2019 Annual MTW Plan, Amendment 1, to add an automatic transition to HACSB's TLA or SLA activity after two years of participation in NCLU for families newly participating in the activity.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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.

The No Child Left Unsheltered (NCLU) initiative aims to end homelessness of unsheltered families with children in San Bernardino County, with special attention to the education and well-being of the children and overall stabilization of the family. NCLU will provide housing assistance through the Housing Choice Voucher program or Affordable Housing program coupled with supportive services.

Through this activity, HACSB has set aside forty (40) project-based vouchers and twenty (20) tenant-based vouchers to be made available to eligible low-income unsheltered families, including:

- Families with children (under 18 years of age) who are unsheltered at the time of application but do not otherwise meet HUD's definition of chronically homeless.
- Young adults participating in the San Bernardino County Department of Children and Family Services Foster Care Aftercare program.

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. Families are referred to NCLU through the county-wide Coordinated Entry System (CES). Referred families may be admitted as a special admission or placed onto a waiting list with a preference specifically for this program. Participating families receive supportive services through HACSB partners, including the San Bernardino County Department of Behavioral Health (DBH).

Family Rent Portion and Rental Subsidy Calculation

The family rent portion and rental subsidy are calculated using the Streamlined Lease Assistance (activity 22) methodology.

Transition to Other HACSB Housing Programs

Our FY 2019 Annual MTW Plan, Amendment 1, included a modification to this activity to automatically transition eligible families to another HACSB housing program after two years of participation in NCLU. Career-able families will transition to the Term-Limited Lease Assistance (TLA) program and elderly/disabled families will transition to Streamlined Lease Assistance (SLA). This modification applies to new NCLU families admitted on or after October 1, 2019.

Foster Care Component

Through our FY 2018 Annual MTW Plan, we modified this activity to add twenty (20) units 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 component will be subject to the availability of funds. To be eligible for housing support through this component of the NCLU 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 component, 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. Additionally, the family will be required to engage in supportive services through HACSB's Family Empowerment Services (FES) department and to complete an Individual Training and Services Plan. To ensure that services provided by the Foster Care program and HACSB's FES 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.

This component has not yet been fully implemented.

PBV Unit Designation

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. These contracts were awarded through a non-competitive process authorized under HACSB's Local Project-Based Voucher program (activity 11). 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 NCLU families more quickly and with more flexibility than in the traditional tenant-based voucher 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	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

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. As a result, HACSB has implemented the following emergency operations change for this activity:

- Supportive services provided to NCLU families may be reduced and/or deferred based on the availability and ability of HACSB staff and partners to provide those services.

Emergency operations will be ended as soon as it is safe, feasible, and practical to return to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

v. Planned Significant Changes

None.

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

i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial approval. Implemented on April 1, 2015.
- FY 2015: Modified to exclude current participants of our Family Self-Sufficiency program.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

ii. Description/Update

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.

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 (FSS) 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.

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 2020 Annual MTW Report.

Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in the office through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. The need for social distancing and other precautions is anticipated to continue into the summer and potentially through the remainder of 2021. HACSB implemented the following emergency operations change for this activity:

- HACSB delayed by six months the termination of assistance for any family whose six-month transition period was scheduled to end between April 1 and September 30, 2020.

Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

iii. Planned Non-Significant Changes

This activity currently applies to families in the Term-Limited Lease Assistance (TLA) program. HACSB intends to exempt TLA participant families from this activity upon approval of this MTW Plan. TLA families have a similar anticipated self-sufficiency trajectory to families participating in the HACSB Homeownership program and Family Self-Sufficiency programs, and this modification will align the application of this activity to those families.

iv. Planned Changes to Metrics/Data Collection

None.

v. Planned Significant Changes

None.

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

i. Plan Year Approved, Implemented, Amended

- FY 2016: Initial approval.

ii. Description/Update

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

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 Mental Health Services Act (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.

In 2015 HPI broke ground on the Horizons at Yucaipa development, and construction of Phase I was completed in the spring of 2017. The phase achieved full lease-up and full occupancy by May 2017. HPI is currently looking at financing options to begin construction of phase II, 27 additional senior units, in the summer of 2021.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

- 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

v. Planned Significant Changes

None.

Activity 26: Local Disaster Short-Term Rental Assistance Program

i. Plan Year Approved, Implemented, Amended

- FY 2017: Initial approval through FY 2017 Annual MTW Plan, Amendment 1.

ii. Description/Update

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

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 structures. In the immediate aftermath, approximately seventy families displaced by the fire needed temporary assistance to stabilize their housing situation. The Blue Cut Fire illustrated the need for HACSB to have a mechanism in place to provide temporary housing assistance to families in the event of certain local disasters. This activity is designed to meet that need.

This activity is 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 and Moving to Work activities for the Housing Choice Voucher Program shall apply to the Local Disaster Short-Term Rental Assistance Program.

This activity has been fully incorporated into HACSB's policies and procedures. However, HACSB will only house families through this activity in the event of a locally declared disaster.

Determination of 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 will 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 and no vouchers will be reserved for this activity.

Eligibility

Assistance in this program will be limited to families displaced as the direct result of a local disaster. 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. No reexamination of income will be conducted during the term of assistance, regardless of the length of the term.

Leveraging of Resources

HACSB will attempt to 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.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

- HC #3: Decrease in Wait List Time
- Local Metric: Number of Households Served through the Activity

v. Planned Significant Changes

None.

Activity 27: Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents

i. Plan Year Approved, Implemented, Amended

- FY 2019: Initial approval through FY 2019 Annual MTW Plan, Amendment 2.
- FY 2020: Modified to include a type two subsidy and income band TTP calculation through FY 2020 Annual MTW Plan, Amendment 3.

ii. Description/Update

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

Through this activity, HACSB is authorized to change the TTP calculation to create one that is based upon income bands, applying a flat TTP within each income band instead of basing the calculation of TTP on gross or adjusted income. Additionally, HACSB is authorized to modify the housing authority subsidy calculation as specified below. The activity applies to:

- 116 RAD-PBV units at the Waterman Gardens Phase III development, Crestview Terrace, excluding any RAD household exercising right of first return to those units. These units use the HACSB Subsidy and Income Band TTP Calculation – Type One.
- Eight PBV units located at the Daycreek Villas community in Rancho Cucamonga, California. These units use the HACSB Subsidy and Income Band TTP Calculation – Type Two.
- Future PBV units on a case-by-case basis. These units may use either the Type One or Type Two HACSB Subsidy and Income Band TTP Calculation.

Implementation Update – Crestview Terrace

Most aspects of this activity will be implemented upon completion of construction when families begin leasing the newly developed units in May, 2021. However, other aspects of the activity are implemented, such as establishing the Tenant Rent Burden Protection Fund for approved hardship exemptions.

This third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) adds approximately 182 family rental units to complete the one-for-one replacement of Public Housing units formerly located there while also adding market rate units to create a mixed-income community. The development utilizes Demolition/Disposition Transition Fund (DDTF) leveraged with City and County of San Bernardino HOME funds, state of California Affordable Housing and Sustainable Communities funds, private healthcare organization (Dignity Health) funds, and 4% Low Income Housing Tax Credits (LIHTC) coupled with tax-exempt private activity bonds. The current unit breakdown is:

- 116 RAD project-based voucher (PBV) units with tax credits.
- 31 tax credit affordable units.
- 35 market rate units with no RAD, PBV, or tax credits.

The following table contains the breakdown of the 147 affordable units by size and tax-credit income bracket:

30% AMI TARGET		50% AMI TARGET		60% AMI TARGET		TOTAL
UNIT SIZE	NUMBER OF UNITS	UNIT SIZE	NUMBER OF UNITS	UNIT SIZE	NUMBER OF UNITS	
1 Bedroom	6	1 Bedroom	6	1 Bedroom	10	22
2 Bedroom	21	2 Bedroom	21	2 Bedroom	39	81
3 Bedroom	9	3 Bedroom	9	3 Bedroom	14	32
4 Bedroom	1	4 Bedroom	2	4 Bedroom	7	10
5 Bedroom	2	5 Bedroom	0	5 Bedroom	0	2
Total	39	Total	38	Total	70	147

HACSB Subsidy and Income Band TTP Calculation – Type One

Through this activity, the total tenant portion (TTP) and contract rents for the Crestview Terrace 116 RAD-PBV tax credit units are set as follows:

- TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will be set below 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. At this time, the contract rents are anticipated to be set at 91.247% of 110% of the FMR. Contract rents may be increased through an increase to the TCAC-published Tax Credit rents.
- The Housing Assistance Payment (HAP) subsidy will be the difference between the contract rent and the TTP. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard RAD-PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

Through these modifications, HACSB is able to apply a simplified rent and subsidy structure without changing the total amount of subsidy provided to support the development.

HACSB Subsidy and Income Band TTP Calculation – Type Two

The eight PBV units located at the Daycreek Villas community in Rancho Cucamonga, which began occupancy in the fall of 2020, utilizes this Type Two calculation.

The total tenant portion (TTP) and HAP subsidy are set as follows:

- TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will equal the TTP plus the fixed HAP subsidy, and shall not exceed 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. Contract rents may be increased through an increase to the TCAC-published Tax Credit rents.

- The Housing Assistance Payment (HAP) subsidy will be fixed at \$700. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

Hardship Case Criteria

HACSB recognizes that under some circumstances, households may experience a hardship that makes it challenging to pay the applicable rent under this activity. Hardship exemption criteria have been developed for households whose rent burden exceeds 40% while participating in this program.

To be eligible for a hardship exemption, the household must:

1. Have a rent burden greater than 40%. Rent burden is calculated as the household's monthly rent portion (the applicable tax credit rent) divided by the household's gross monthly income; and
2. Request a hardship exemption in writing in accordance with HACSB's policies; and
3. Be in compliance with HACSB's policies, program rules, and regulations.

A hardship exemption may be approved for the following reasons:

1. The family experiences a death of a household member with income;
2. Any income-earning member of the assisted family no longer remains in the unit;
3. An elderly or disabled household experiences a permanent loss of income;
4. Unforeseen and involuntary permanent loss of income for a family member under the age of 18;
5. Unforeseen involuntary loss of employment or unforeseen loss of income due to major illness as determined by a medical professional; or
6. Unforeseen involuntary permanent loss of income for an adult family member who is attending high school.

If a hardship exemption has been approved, HACSB will reduce the household's TTP to 40% of gross income for a period of six months. During the hardship exemption period, HACSB will continue to pay the HAP subsidy plus the difference between the household's reduced TTP and the tax credit rent ("Hardship HAP" – the difference between 40% of the household's gross income and the applicable tax credit rent). At the end of the hardship exemption period, the household's TTP will return to the tax credit rent and the HACSB subsidy will return to the previous HAP subsidy. For example:

A 3-person household is residing in a 2-bedroom 50% tax credit unit. They pay the tax credit rent of \$758 per month. Their income is \$27,315 per year and their rent burden is 33.3%. HACSB pays a HAP subsidy of \$564 per month based on the subsidy and income band calculation.

A 17-year-old member of the household experiences an unforeseen and involuntary permanent loss of income. The household's new income is \$21,000 per year. Their rent burden under the base income band TTP calculation is now 43.3%.

HACSB approves a hardship exemption for the household based upon the unforeseen and involuntary permanent loss of income for a family member under the age of 18. For six months, the household's TTP will be set at 40% of their gross income, or \$700. During the

hardship exemption period HACSB will continue to pay to the owner the HAP subsidy of \$564 per month, plus the difference between the TTP and the tax credit rent, or \$58.

At the end of the hardship exemption period, the household's TTP will return to the tax credit rent. The HACSB subsidy will return to \$564.

No more than one hardship exemption per household may be approved within a 12-month period. Approval will be subject to the availability of funds.

Crestview Terrace Units: HACSB will apply MTW funding flexibility to create a "Tenant Rent Burden Protection Fund" from which the Hardship HAP will be paid. HACSB and its developer partner will both contribute to this fund to ensure the availability of hardship exemptions for rent-burdened households.

All Other Units: Hardship HAP shall be paid using MTW Block Grant funds in the same manner as HAP.

iii. Planned Non-Significant Changes

None.

iv. Planned Changes to Metrics/Data Collection

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

- HC #1: Additional Units of Housing Made Available

v. Planned Significant Changes

None.

B. Not Yet Implemented Activities

HACSB does not have any activities that are approved and not yet implemented.

C. Activities on Hold

Activity 3: Alternate Assessment Programs

i. Description

This activity was approved through HACSB's FY 2009 Annual MTW Plan and has not yet been implemented. The activity was placed on hold via HACSB's FY 2010 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.

ii. Reactivation Plan Update

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. An update on the assessment system was provided at the MTW Conferences in 2019 and 2021, and testing by current MTW agencies is ongoing. 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. This activity remains on hold pending approval and implementation of that system.

iii. Planned Non-Significant Changes

None.

D. Closed Out Activities

Activity 2: Strategic Investment Policies

i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved through our FY 2009 Initial Annual MTW Plan and implemented in November 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out in response to HUD's comments regarding the HACSB FY 2019 Annual MTW Plan, wherein HUD stated that Notice PIH 2011-67 (Implementation of New Cash Management Requirements for the Housing Choice Voucher Program) effectively nullifies the activity and requested that the activity be moved to the Closed Out Activities section of HACSB's Annual MTW Plan.

Activity 6: Elimination of Assets

i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2009 Annual MTW Plan and was implemented on October 1, 2009. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (this activity), 9 (Elimination of Earned Income Disallowance), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

Activity 7: Controlled Program Moves

i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2009 Annual MTW Plan and implemented on February 1, 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity resulted in a significant decrease in agency costs and staff time spent related to processing voluntary moves. In FY 2017, both costs and time spent reflected approximately a 64% decrease over the baselines. The staff time spent per move was 42% lower in FY 2017 than the baseline value. However, because the total number of moves did not decrease as much as was anticipated, the benchmarks for staff time and cost savings were not reached.

As with all of our MTW activities, HACSB performed internal monitoring of aspects of the Controlled Program Moves activity beyond what was reported through our annual MTW reports. We found that, while this activity resulted in cost and time savings related directly to a reduction in the number of moves processed annually, it also resulted in additional administrative burden in other areas. For example, we identified an increase in the number of moves requested as a reasonable accommodation and/or under the provisions of the Violence Against Women Act (VAWA) after implementation of this activity. Additionally, the two-year lease requirement caused other challenges, especially for families nearing the end of their participation in the Term-Limited Lease Assistance Program. As a result, we eliminated the two-year lease requirement and closed out this activity through our FY 2019 Annual MTW Report.

Activity 9: Elimination of Earned Income Disallowance

i. Plan Year Approved, Implemented, Amended, and Closed Out

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. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (this activity), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

Activity 15: Pilot Work Requirement

i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in the FY 2010 Annual MTW Plan. The work requirement was implemented on January 1, 2013, for the Maplewood Homes Public Housing community, and expanded to include all inbound portability families effective August 1, 2010. The work requirement at Maplewood Homes was ended in FY 2016 as a result of the RAD conversion of that site. The work requirement for portability families was ended and this activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out as a result of internal analysis which identified certain challenges in administering the work requirement, as well as advantages of ending the requirement. Ending the work requirement will reduce administrative burden, streamline HACSB's processes, and increase housing choice for families who desire to exercise portability to San Bernardino County. Additionally, ending the work requirement will empower families to make decisions about their housing and employment that are best for their unique family circumstances.

Activity 16: Operating Subsidy for Vista del Sol

i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved through the second amendment to our FY 2010 Annual MTW Plan and implemented on April 23, 2010. This activity was closed out via HACSB's FY12 Annual MTW Plan.

ii. Reason(s) for Close-Out

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

Activity 17: Local Income Inclusions

i. Plan Year Approved, Implemented, Amended, and Closed Out

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 Annual MTW Plan. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (Elimination of Earned Income Disallowance), and 17 (this activity) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

Activity 21: Utility Allowance Reform

i. Plan Year Approved, Implemented, Amended, and Closed Out

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

ii. 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 Term-Limited 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 Term-Limited Lease Assistance programs but at this time, the Agency has postponed utility allowance reform indefinitely.

V. Sources and Uses of MTW Funds

A. Estimated 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. Additional information may be made available after this Plan is posted for public comment and the values reported below may change when this Plan is presented to the HACSB Housing Commission for approval and/or when the Plan is submitted to HUD for approval.

i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	509,378
70600	HUD PHA Operating Grants	104,430,082
70610	Capital Grants	3,981,030
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	9,147,865
71100+72000	Interest Income	265,048
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	132,216
70000	TOTAL REVENUE	118,465,619

ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	12,011,714
91300+91310+92000	Management Fee Expense	2,877,672
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	62,700
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	163,034
93500+93700	Labor	137,883
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	866,116
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total insurance Premiums	116,779
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	26,727
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	4,517,220
97300+97350	Housing Assistance Payments + HAP Portability-In	97,685,774
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
90000	TOTAL REVENUE	118,465,619

DESCRIPTION OF VARIANCE BETWEEN ESTIMATED TOTAL REVENUE AND ESTIMATED TOTAL EXPENSE
N/A.

iii. Description of Planned Use of MTW Single Fund Flexibility

DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

1. HACSB's Local FSS activity (#19) is funded using single fund flexibility with savings achieved through other MTW activities.
2. HACSB's Family Empowerment Services department (FES) and its services, which are not a separate MTW activity, are funded using single fund flexibility. This department was previously called Career Development Initiatives (CDI).
3. HACSB's post-assistance tracking survey for Term-Limited Lease Assistance families, implemented in FY 2018, includes a financial incentive for survey participants which is funded through the single fund flexibility.
4. HACSB is authorized to use Section 9 (Public Housing) funds defined as Public Housing operating reserves, Capital Fund Grants, Replacement Housing Factor Funds, and Demolition and Disposition Transitional Funds at former Public Housing properties that have been converted to Project-Based Voucher (PBV) properties through the Rental Assistance Demonstration. This authorization applies to accumulated reserves, including MTW reserves, and any future allocation of the funds specified in this authorization. The funds will be used for capital needs rehabilitation, operating expenses, and redevelopment costs.
5. 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 is 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.
6. Single-fund flexibility may be utilized to support expenses for RAD-converted developments, including, but not limited to, mandated reserve contributions.
7. Single-fund flexibility is crucial to HACSB's affordable housing development efforts. By leveraging multiple internal sources (Capital Fund, RHF, Voucher funding), HACSB maximizes 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.
8. HACSB will utilize single fund flexibility to establish a retirement trust fund. Doing so will decrease the current unfunded liability and reduce future expenses.
9. In FYE 2022 HACSB anticipates opening a community services center (CRC) in partnership with the Inland Empire Health Plan (IEHP) in the City of San Bernardino. The CRC will provide customers access to HACSB and IEHP services, including assistance with housing-related needs, wellness services, and self-sufficiency resource. HACSB will use single-fund flexibility to support the development of the CRC.
10. HACSB's proposed Activity 28: Landlord Incentives will be funded through single-fund flexibility.

B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

No.

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

Yes.

iii. Has the MTW PHA provided a LAMP in the appendix?

Yes.

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

No changes to the LAMP are anticipated during the Plan Year.

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
HACSB is currently in the process of converting our entire Public Housing portfolio under the RAD program in accordance with HUD approvals. As of this writing, only one Public Housing development (Los Olivos, Upland) is pending RAD conversion. We anticipate that all units will be converted to RAD project-based vouchers (PBV) by the end of CY 2021.

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

No. RAD Significant Amendments were included with prior MTW Plans.

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

HACSB is not submitting a RAD Significant Amendment through this MTW Plan.

VI. Administrative

A. Board Resolution and Certification of Compliance

The following items are (or will be, upon approval by the HACSB Board of Commissioners) included with this Plan:

1. Resolution of the HACSB Board of Commissioners adopting this Annual MTW Plan and the Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan
2. Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan (from Form HUD 50900)

HOUSING AUTHORITY RESOLUTION NO. 2021-113

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO'S ANNUAL MOVING TO WORK PLAN FOR FISCAL YEAR 2021-2022

RECITALS

WHEREAS, the Housing Authority of the County of San Bernardino (HACSB) is a duly formed housing authority of the State of California, and is vested with the responsibilities set forth in Division 24, Part 2, Article 4 (Sections 34310-34334) of the California Health and Safety Code, which includes providing low and moderate income housing within its jurisdiction; and

WHEREAS, HACSB entered into a Moving to Work (MTW) contract with the United States Department of Housing and Urban Development (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 develop a new MTW activity and modify certain previously approved MTW activities; and

WHEREAS, the HACSB has developed its Fiscal Year 2021-2022 Annual MTW Plan, to include the proposed modifications to those MTW activities and in accordance with HUD requirements.

OPERATIVE PROVISIONS

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

Section 1. The Board of Commissioners 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 Commissioners hereby approves the proposed Fiscal Year 2021-2022 HACSB Annual MTW Plan, on July 13, 2021.

Section 3. A complete copy of the 2021-2022 Annual MTW Plan can be found at <https://hacsb.com/hacsb-2022-moving-to-work-plan-available-for-review/>.

Section 4. The Board of Commissioners hereby approves the HUD-required Certifications of Compliance with Regulations form authorizing HACSB to submit the proposed Fiscal Year 2020-21 Annual MTW Plan to HUD and certifies that HACSB has complied or will comply with requirements related to the submission and implementation of the Plan.

Section 5. This resolution shall take effect immediately upon its adoption.

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

AYES: Commissioner Johnson, MacDuff, Miller, Muñoz, Pinedo, Tarango

NOES:

ABSENT: Commissioner Cooper

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

I, **Maria Razo**, Secretary of the Board of Commissioners 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 Commissioners, by vote of the members present, as the same appears in the Official Minutes of said Board at its meeting of Tuesday, July 13, 2021.

DocuSigned by:
Maria Razo
3D2645B57CA34F5...
Secretary

CERTIFICATIONS OF COMPLIANCE

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

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

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (10/01/2021), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the County of San Bernardino

CA019

MTW PHA NAME

MTW PHA NUMBER/HA CODE


I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Timothy Johnson

Commission Member

NAME OF AUTHORIZED OFFICIAL

TITLE

DocuSigned by:

A851630EA40D44B...

7/13/2021

SIGNATURE

DATE

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

B. Documentation of Public Process

This section includes a detailed timeline of the public process for this Annual MTW Plan and a transcript of any public comment(s) received during the public process. A copy of the Notice of Public Hearing for this Annual MTW Plan is included in the appendices.

The Housing Authority of the County of San Bernardino (HACSB), California held public hearings for the Fiscal Year 2021-2022 Annual Moving to Work (MTW) Plan at the Housing Authority’s Administration Office at 715 East Brier Drive, San Bernardino, CA 92408 on Thursday, May 27, 2020, at 10:00 a.m. and Wednesday June 9, 2021, at 1:00 p.m.

Housing Authority Attendees

- Renee Kangas, Management Analyst
- Nicole Beydler, Director of Policy and Public Relations
- Tony Bonilla, Management Analyst

Other Attendees

- None

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 2019-2020 Annual Moving to Work Plan before submission to the Housing Authority’s Housing Commission, and HUD for approval.

The proposed Plan was made available for public viewing for 30 days beginning April 24, 2019. The plan was advertised in seven local newspapers, on the HACSB website, and copies were available at all HACSB offices located throughout the county.

Call for Public Comments

On Wednesday, June 9, 2021, the public hearing convened at 1:00 p.m., with Nicole Beydler, Director of Policy and Public Relations, presiding. No members of the public attended, and no public comments were received. The public hearing ended at 1:30 p.m.

On Tuesday, June 15, 2021, the public hearing convened at 10:00 a.m., with Nicole Beydler, Director of Policy and Public Relations, 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 10:25 a.m.

SUMMARY OF PUBLIC PROCESS	
DATE	ACTION

May 28, 2021	Public comment period opened. This Annual MTW Plan was posted on the HACSB website and made available at all HACSB offices.
May 27, 2021 through May 28, 2021	A Notice of Public Hearing regarding this Annual MTW Plan, including the dates/times of public hearing(s) and the public comment period, was published in the following local newspapers: <ol style="list-style-type: none"> 1. San Bernardino County Sun 2. Black Voice 3. El Chicano 4. Inland Valley Daily Bulletin 5. Precinct Reporter 6. Daily Press 7. The Press Enterprise
June 9, 2021 and June 15, 2021	Public hearings held. Due to the ongoing COVID-19 pandemic, public hearings were held virtually using Zoom. Minutes of the public hearings and a summary of public comments received is included in this section.
June 28, 2021	Public comment period closed.
July 13, 2021	Presentation of this Annual MTW Plan to the HACSB Board of Commissioners for approval.

SUMMARY OF PUBLIC COMMENTS	
DATE RECEIVED FORMAT RECEIVED FROM	COMMENT AND/OR NOTES
	None

C. Planned and Ongoing Evaluations

HACSB has contracted with Loma Linda University (LLU) for third-party evaluation of several MTW initiatives and families served through our MTW programs. This section provides a brief summary of those evaluations.

1. **Term-Limited Lease Assistance Program (Activity 20):** The LLU longitudinal study of this initiative began in 2012 and is ongoing. The study follows participating families through their progress from initial lease-up through their end of term, tracking their goals and accomplishments. In FY 2017, HACSB implemented an additional component to monitor the self-sufficiency related progress of families for up to two years after commencement of housing assistance through a voluntary survey process. The evaluation of current and post-assistance families in this activity will continue in FY 2022, and information gained through the study will continue to be used to adapt and develop the activity.
2. **No Child Left Unsheltered (Activity 23):** A longitudinal study of this activity began in 2015 to identify its effects on participating families. The evaluation is ongoing, and focuses on family safety and stability, physical and mental health of adults and children, school attendance of children, employment, income, education advancement, self-sufficiency activities, financial choices, use of resources, and other effects on children. The reports and recommendations provided by LLU based upon the evaluation have informed HACSB's policy decisions regarding the NCLU activity, especially the enhancements and modifications made through HACSB's FY 2019 MTW Annual Plan. The reports indicated that the activity has had strong positive effects on the mental health and well-being of children participating in the program. The evaluation will continue in FY 2022.
3. **Permanent Supportive Housing:** HACSB is partnering with LLU for evaluation of our two permanent supportive housing (PSH) developments for homeless and chronically homeless individuals and families: Golden Apartments in San Bernardino and Desert Haven Apartments in Victorville. Families in these two developments are served through MTW project-based vouchers. Golden Apartments opened in early 2020, and LLU has provided a baseline/benchmark report of the first families to reside there. The LLU report utilized the Self-Sufficiency Matrix (SSM) assessment tool and HACSB administrative data to assess residents' needs in eighteen domains, including education, employment, housing, health care, mental health, transportation, family relations, substance abuse, and others. The study found that residents' areas of highest need were related to physiological needs and safety, such as food and housing, and mental/physical healthcare and employment. The study also found that the supportive services provided to residents through community partners to augment the housing assistance and help ensure a successful transition to stable, long-term housing, has been vital to the success of the development. The report provided recommendations to HACSB, including: continuing to focus on meeting residents' basic needs; continuing to provide access to mental health and substance abuse services and evaluating whether additional supports in these areas are needed; and focusing on the overall stabilization of the Golden Apartments and Desert Haven Apartments residents and communities before expanding PSH efforts so that lessons learned from these two sites may be applied to future developments. LLU will prepare a similar report for Desert Haven Apartments after residents move into that site. Evaluation will continue and LLU will provide annual reports for these two sites.
4. **Other Activities:** HACSB also intends to partner with LLU for evaluations of future MTW activities that are in development. More information about these evaluations will be included as they are developed.

D. Lobbying Disclosures

Copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071) are (or will be, upon approval by the HACSB Board of Commissioners) included here.


DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB

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

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 8, 27, 31, 35, 39	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	7. Federal Program Name/Description: Moving to Work CFDA Number, if applicable: _____	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i> Potomac Partners DC 700 Pennsylvania Ave SE, Suite 320 Washington, DC 20003	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Alcalde, Rick; Feliz, Dan	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: Maria Razo Title: Executive Director Telephone No.: (909) 332-6305 Date: 07/15/20	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Certification of Payments to Influence Federal Transactions

Applicant Name

Housing Authority of the County of San Bernardino

Program/Activity Receiving Federal Grant Funding

Moving to Work Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Maria Razo

Title

Executive Director

Signature

DocuSigned by:
Maria Razo

Date (mm/dd/yyyy)

7/15/2021

Appendices

Appendix A. Capital Fund Program – Five-Year Plan and Budget

**Housing Authority of the County of San Bernardino
Capital Fund Program- Five Year Plan & Budget (2017-2021)**

AMP 202					
Development	City	Units	Budget	Plan Year	Activities
Waterman Gardens	San Bernardino	252	888,798	2017	Redevelopment Activity (phase 1)
Waterman Gardens	San Bernardino	252	1,491,907	2017	Redevelopment Activity
Waterman Gardens	San Bernardino	252	1,205,427	2017	Redevelopment Activity
Waterman Gardens	San Bernardino	252	1,847,361	2018	Redevelopment Activity
Waterman Gardens	San Bernardino	252	389,753	2018	Redevelopment Activity
Waterman Gardens	San Bernardino	252	1,376,792	2020	Redevelopment Activity
Waterman Gardens	San Bernardino	252	500,000	2021	Redevelopment Activity

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

Total- AMP 202

7,700,038

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 204					
Development	City	Units	Budget	Plan Year	Activities
			-		

Total- AMP 203

-

AMP 205					
Development	City	Units	Budget	Plan Year	Activities
Redlands - Lugonia Site	Redlands	115	661,126	2017	Redevelopment Activities

Redlands - Lugonia Site	Redlands	115	597,490	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	647,745	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	639,429	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	649,769	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	756,794	2017	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	1,105,833	2018	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	1,079,508	2019	Redevelopment Activities
Redlands - Lugonia Site	Redlands	115	500,000	2021	Redevelopment Activities

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

Total- AMP 205 6,637,694

AMP 206					
Development	City	Units	Budget	Plan Year	Activities

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

Total- AMP 206 -

AMP 207					
Development	City	Units	Budget	Plan Year	Activities

* note: balance of units in AMP 206 have completed RAD conversion as of 10/2019

Total- AMP 207 -

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

Subtotal Annual Agency Wide Activities			<u>0</u>		
--	--	--	----------	--	--

Total - Agency Wide	X5 years		<u>0</u>		
----------------------------	-----------------	--	-----------------	--	--

Grand Total- All AMP's			<u>14,337,732</u>		
Annual Allocation (including RHF)			2,867,546		

Appendix B. Annual Statement/Performance and Evaluation Report (Form HUD-50075.1)

Part I: Summary						
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:			FFY of Grant: FFY of Grant Approval:	
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					
3	1408 Management Improvement					
4	1410 Administration					
5	1480 General Capital Activity					
6	1492 MovingToWorkDemonstration	\$1,461,207.00				
7	1501 Collater Exp / Debt Srvc					
8	1503 RAD-CFP					
9	1504 Rad Investment Activity					
10	1505 RAD-CPT					
11	9000 Debt Reserves					

(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 include here

Part I: Summary					
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:		FFY of Grant: FFY of Grant Approval:	
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
12	9001 Bond Debt Obligation				
13	9002 Loan Debt Obligation				
14	RESERVED				
15	RESERVED				
16	RESERVED				
17	RESERVED				
18a	RESERVED				
18ba	RESERVED				
19	RESERVED				
20	RESERVED				
21	Amount of Annual Grant: (sum of lines 2-20)	\$1,461,207.00			

(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 include here

Part I: Summary						
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. Date of CFFP:			FFY of Grant: FFY of Grant Approval:	
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	
22	Amount of line 21 Related to LBP Activities					
23	Amount of line 21 Related to Section 504 Activities					
24	Amount of line 21 Related to Security - Soft Costs					
25	Amount of line 21 Related to Security - Hard Costs					
26	Amount of line 21 Related to Energy Conservation Measures					

Signature of Executive Director /S/ MZK266	Date 08/30/2019	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 include here

Part II: Supporting Pages								
PHA Name: Housing Authority of the County of San Bernardino		Grant Type and Number Capital Fund Program Grant No. CA16P01950119 Replacement Housing Factor Grant No. CFFP(Yes/No):				Federal FFY of Grant:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost ⁽²⁾		Status of Work
				Original	Revised ⁽¹⁾	Funds Obligated	Funds Expended	
Not associated with any specific development	Assignment of Funds to MTW BLI (MTW (1492)) Description : Assignment of Funds to MTW BLI	1492		\$1,461,207.00				
	Total:			\$1,461,207.00				

(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:	
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 C. 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 (LAMP). The program describes 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 LAMP 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. We feel that the indirect cost rate methodology will best serve our mission, versus the previously used fee-for-service methodology. In accordance with the federal Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (referred to as OMB "Omni Circular"), we elected 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 performed a detailed examination of our 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 resulted in agency-wide solutions and our combined efforts help us achieve our goals. This reinforces the need for an indirect cost rate methodology that allows the flexibility to combine resources and achieve inter-department solutions that represent a simple unified solution for the families that we serve and our agency. We 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 services, 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 260 agency computers in 27 locations throughout our county. They respond to an average of 120 help desk tickets per month that result in around 20 site visits per month.

Policy and Public Relations – Our centralized Policy and Public Relations department is responsible for outreach and education efforts to partners, stakeholders, elected representatives, and HUD. This team also coordinates our Moving to Work efforts, including planning and reporting, communication with HUD teams, and analysis and evaluation efforts. The Policy and Public Relations team oversees our partnership with Loma Linda University for third-party evaluation of various HACSB programs and services. The partnership, which has been in place since 2010, has included a longitudinal evaluation of our Term-Limited Lease Assistance and No Child Left Unsheltered activities, needs assessments to help identify areas of need and appropriate supportive services, and evaluations of our first two permanent-supportive housing sites for homeless and chronically individuals and families. Additionally, the Policy and Public Relations team coordinates the board review and approval processes.

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, the Fair Housing Act, and Americans with Disabilities Act (ADA).

Development – Our centralized 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 HACSB’s in-house property management teams as a technical, as well as planning and implementation resource for non-routine maintenance and emergency rehabilitation projects. The Department also assists property management in the completion of all Physical Needs Assessments and due diligence reports for the entire portfolio of HACSB residential developments. This department also either directly oversees or assists in all of the Capital Fund improvement and rehabilitation projects within the public housing or RAD converted housing portfolios and administers all grant funding and debt financing that can be associated. The development team led the implementation of HACSB’s first Permanent Supportive Housing sites for homeless and chronically homeless individuals and families. They also continue overseeing the ongoing major revitalization of HACSB’s oldest public housing sites in Redlands (Lugonia) and San Bernardino (Waterman Gardens). Finally, Development administers a very successful homeownership program that has helped over 200 low-income families overcome barriers and achieve homeownership. The Homeownership program utilizes a variety of methods to aid participants on their path to homeownership, 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. Centralized duties include the oversight of the contract needs of our housing sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with procurement staff to define scopes of work, and ensuring the work is done properly.

Local Asset Management Implementation

Leadership - Our local asset management program is led by a team consisting of representatives from the following departments: housing services, development, finance, administrative services, human resources, information services, procurement, and policy and public relations.

Project-based Management - We expect all of our programs, regardless of funding source, to be accountable for project-based management, budgeting, and financial reporting.

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 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 “Omni Circular” 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 tenant 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 “Omni Circular” 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 three fees are:

- Asset Management Fees
- Management Fees
- Bookkeeping 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 \$90.49 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.

Per the requirements of OMB “Omni Circular”, 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 D. Non-Moving to Work Information

Special Purpose Programs

In addition to the MTW Voucher Program, HACSB administers other non-Moving to Work affordable housing programs such as Mainstream, Housing Opportunities for Persons with AIDS (HOPWA), Veteran’s Affairs Supportive Housing (VASH), and Continuum of Care.

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED <i>AS OF MARCH 2021</i>
Mainstream 5	This program serves individuals and families with disabilities.	80
Mainstream 811	This program serves non-elderly adults with disabilities, including persons transitioning out of institutional housing, at risk of becoming institutionalized, homeless or at risk of becoming homeless, or persons who previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project. HACSB has partnered with Knowledge and Education for Your Success (KEYS), the San Bernardino County Department of Behavioral Health (DBH), Inland Empire Health Plan (IEHP), Inland Regional Center, and Rolling Start for referral of customers, and supportive services such as case management and housing navigation.	95
Housing Opportunities for Persons with AIDS (HOPWA)	HACSB has partnered with Foothill Aids Project to offer tenant-based and project-based 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.	54
Veteran’s Affairs Supportive Housing (VASH)	HACSB and Veterans Administration Medical Center have partnered to provide tenant-based and project-based vouchers and supportive services to eligible homeless veterans with severe psychiatric or substance abuse disorders. The program goals include promoting Veteran recovery and independence to sustain permanent housing.	421
Master Leasing Program	This program is funded through the State of California Mental Health Services Act and serves mentally ill or developmentally disabled families with emergency shelter housing. Case management and comprehensive supportive services are provided for program participants.	11

Continuum of Care Programs

The Continuum of Care Program (formerly Shelter Plus Care) provides rental assistance for hard-to-serve chronically homeless persons with disabilities in connection with supportive services funded from sources outside the program.

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED <i>AS OF MARCH 2021</i>
Stepping Stones	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.	32
New Horizons	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.	165
Laurelbrook Estates	This program assists individuals or families experiencing disabling conditions and homelessness and is a Continuum of Care project-based voucher subsidy tied to designated scattered sites throughout the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health.	26
Project Gateway	HACSB formed a partnership with Ontario Housing Authority, Mercy House Living Centers Inc., and the San Bernardino County 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.	12
Cornerstone	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.	49
Whispering Pines	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.	21
Lantern Woods	This program implemented in 2012 and is a Continuum of Care project-based 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.	14

HACSB College Scholarship Program

Since 1991, the Housing Authority has been proud to assist eligible participants in achieving their higher educational goals through scholarships. To date, HACSB has awarded 302 students with \$215,500 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 college and technical/vocational school students receive a \$750 scholarship. The Housing Authority uses non-public funds to support this program promoting educational success.

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-Public Housing Authority 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. KEYS is committed to a community where individuals and families can lead meaningful and empowered lives and pass that legacy to future generations.

Over the past fiscal year, KEYS has focused on some of the county's families in greatest need. Since January 2015, in partnership with HACSB and the San Bernardino County Transitional Assistance Department (TAD), KEYS has administered 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. The Housing Support program was followed by the launch of two additional Rapid Rehousing programs called Keys for Success (KFS) and Keys for Life (KFL) through the U.S. Department of Housing and Urban Development's Continuum of Care aimed at serving homeless individuals and families that need housing and intensive case management up to 24 months. KEYS has utilized its experience with the Supportive Services for Veterans and their Families (SSVF) program and housing navigation to rapidly identify and secure permanent housing for families in the KFS and KFL programs. As part of the ongoing support of the families (up to 24 months) and to help ensure family 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.

KEYS continues to focus on a collective impact strategy which aligns with a county wide approach.

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

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 30 years of housing development experience behind it, HPI, Inc. provides HACSB the means to leverage a variety of public and private funding sources to continue to increase the supply of affordable housing throughout the county of San Bernardino.

In 2017 HPI completed the Horizons at Yucaipa development, a new construction affordable senior project that provides 50 units of affordable senior housing. HPI also acquired a 25-unit development in the City of Loma Linda for homeless and affordable Veteran Housing, providing much-needed supportive services to Veterans living on site. In 2018 HPI completed Loma Linda Veteran's Village, a project in partnership with Meta Housing that provides 87 affordable housing units for veterans and their families. In 2018 HPI and HACSB began construction on two Permanent Supportive Housing projects to provide 68 units of affordable housing, with onsite services, to homeless individuals within the County of San Bernardino. The first site, Golden Apartments, opened in early 2020 and has provided affordable housing coupled with supportive services for residents. The second project, Desert Haven apartments, is anticipated to be completed in the summer of 2021.

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 704 units.

Appendix E. Fact Sheets

This section includes a sample of HACSB Fact Sheets which we developed to help us communicate with our customers about the variety of housing programs and services we administer. These Fact Sheets are one tool we use to help educate our team, participants, residents, landlords, and community about who we are as an agency, and our work toward our mission.

HACSB Fact Sheets are posted online at www.hacsb.com/publications and are available at our offices.

WHO WE ARE



HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO
Building Communities, Changing Lives

As one of the most progressive housing authorities in the country and the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 25,000 people, most of whom are seniors, individuals with disabilities, veterans, and children.

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.

Housing Families

We help low-income families attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). More than 10,500 families are served through housing assistance payments made to landlords on behalf of the families. Other families reside in units owned and managed by HACSB. These programs provide a critical safety net for families in San Bernardino County, where families would need to earn nearly twice the minimum wage to afford rent for a two-bedroom apartment.

Moving to Work

As a testament to our high performance, HACSB was designated by Congress in 2008 as a Moving to Work (MTW) public housing agency, allowing HACSB to waive some HUD program requirements in order to develop local policies adapted to the diverse communities that make up San Bernardino County.



Real Estate Development

As HUD does not provide HACSB with capital funds for development of additional affordable housing, we rely on a variety of partners to meet this gap. Development of new affordable housing has been made possible through funding and loans from the County of San Bernardino, various cities throughout the county, and other partners.



Housing Authority of the County of San Bernardino, by the numbers:



10,607
families housed

24,762
residents/participants housed, making up 1.1% of the county's population



251
clients who have become new homeowners since 2000

302
scholarship recipients since 1991

120 —
100 —
80 —
60 —
40 —
20 —
0 —

\$1.8 million
spent on rehab, construction, and acquisition of housing units

\$17.9 million
paid to 639 vendors for various programs and services

\$103.7 million

paid in housing assistance to almost 3,445 landlords



MOVING TO WORK DESIGNATION



HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO

HACSB MOVING TO WORK

In 2008, the Housing Authority of the County of San Bernardino (HACSB) was designated as a Moving to Work (MTW) Agency by Congress. This designation allows HACSB to waive some HUD program requirements to develop local policies adapted to the diverse communities that make up San Bernardino County.

WHAT IS IT?

MTW is a national demonstration program for public housing authorities to design and test affordable housing strategies. Lessons learned by MTW agencies can influence national housing policy to improve programs and services for all families. Fewer than 2% of housing authorities are designated MTW agencies.

Using MTW flexibilities, we have executed 27 innovative initiatives based on the three statutory objectives of the MTW demonstration:



1. Save taxpayer dollars through efficient work



2. Help our families achieve economic independence



3. Ensure a family's freedom of housing choice

SPOTLIGHT ON SUCCESS PARTICIPANT PROFILES

JODI

A single mother of three, Jodi became a participant in HACSB'S Term-Limited Lease Assistance Program (TLA) with the goal of becoming a homeowner and providing for her kids. Together, with staff she was able to exit the program a year and a half early to buy a home in the High Desert, leaving room for more program participants.



JULIAN

Recent Term-Limited Lease Assistance Program participant Julian states that "there is no secret to achieving homeownership". Combining hard work and coaching from HACSB staff, Julian was able to organize his budgeting and pay off over \$22,000 in credit card debt. Julian recently moved into his own home and is now a part of HACSB's Homeownership Program.

MOVING TO WORK ACHIEVEMENTS

We are proud to report the results from some of our endeavors:



Saving Taxpayers' Dollars

Saved **231,000 staff hours** through streamlining the income and rent process.



Assisting Families to Achieve Self-Sufficiency

We actively seek out partnerships with expert service providers to help our customers work toward their goals.

Loma Linda University (LLU): LLU has conducted several needs assessments to determine the top needs of our residents, which include mental health services, family counseling, and case management.



Ensuring Housing Choice

Nearly **2,300 families leased units** that would have been out of reach under traditional program regulations. Leasing in areas of opportunity **increased by 30%**



Promoting Economic Independence

-50% ————— 0 ————— 50%



33% decrease in the number of families receiving assistance income



41% average increase in earned income among families served



**HOUSING AUTHORITY OF THE
COUNTY OF SAN BERNARDINO**
Building Communities, Changing Lives



HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO

Building Communities, Changing Lives



LOMA LINDA UNIVERSITY

LOMA LINDA UNIVERSITY RESEARCH PARTNERSHIP

Since 2010, the Housing Authority of the County of San Bernardino (HACSB) has partnered with Loma Linda University (LLU) for third-party research and evaluation of our Moving to Work (MTW) initiatives. The LLU School of Behavioral Health has conducted eight nationally recognized research studies and needs assessments of six HACSB initiatives, helping to inform policy and shape program design.

This program restored a sense of independence and gave me the opportunity to see myself as capable and worthy again.

—Anonymous participant

EVALUATING THE HACSB TERM-LIMITED LEASE ASSISTANCE PROGRAM

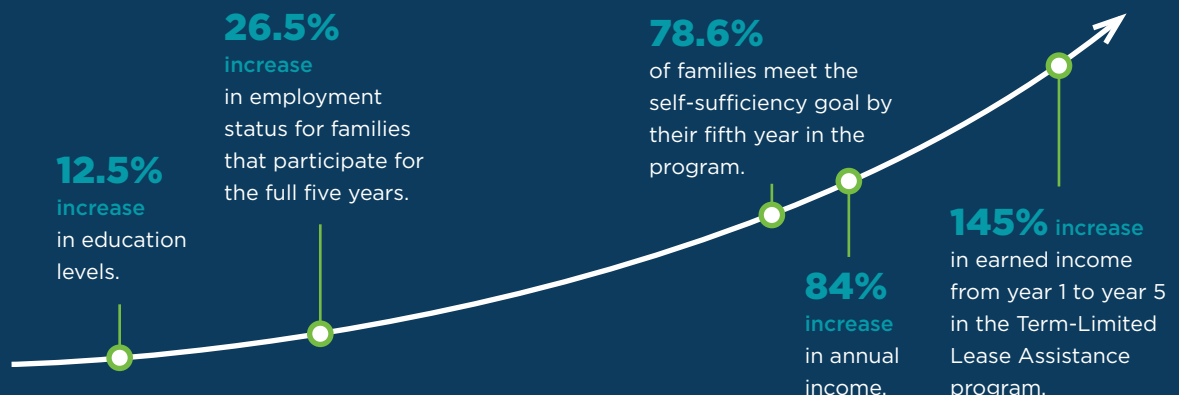
HACSB Term-Limited Lease Assistance (TLA) initiative offers five years of housing assistance coupled with services to assist families on their path to self-sufficiency. Since 2012, LLU spearheads longitudinal research of current TLA families and, since 2017, post-assistance research of former TLA families for up to two years after they exit housing assistance. These research endeavors are notable for their duration, unique areas of study, and size.

The longitudinal study of the TLA program began in 2012 and is LLU's longest running evaluation of a HACSB MTW initiative and reports the following outcomes:

Over 2,000 families to date

Post-assistance research of the TLA program began in 2017 and provides insight into what happens after families leave the TLA program:

268 families to date



4.5% 4.5% of exited families report having purchased a home,

7.2% 7.2% are staying with a friend or relative, and the majority of exited families report that they are renting their current residence.



71% Employment gains were retained even two years after leaving assisted housing, with 71% of families employed full-time.

Appendix F. Summary of HACSB Moving to Work Activities

NO.	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Closed Out
3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
4	Biennial and Triennial Recertifications	Cost Effectiveness	FY 2009	Implemented
5	Simplified Income Determination	Cost Effectiveness	FY 2009	Implemented
6	Elimination of Assets	Cost Effectiveness	FY 2009	Closed Out
7	Controlled Program Moves	Cost Effectiveness	FY 2009	Closed Out
8	Local Policies for Portability	Economic Self-Sufficiency	FY 2009	Implemented
9	Elimination of Earned Income Disallowance	Economic Self-Sufficiency	FY 2009	Closed Out
10	Minimum Rent	Economic Self-Sufficiency	FY 2009	Implemented
11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented
15	Pilot Work Requirement	Economic Self-Sufficiency	FY 2010	Closed Out
16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
17	Local Income Inclusion	Economic Self-Sufficiency	FY 2011	Closed Out
18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
19	Local FSS program	Economic Self-Sufficiency	FY 2011	Implemented
20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented
25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Implemented
27	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented
28	Landlord Incentives	Expanding Housing Opportunities	FY 2022	Proposed