



SAN DIEGO  
HOUSING  
COMMISSION

# Moving Forward Moving to Work Program Annual Plan for Fiscal Year 2011

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## SECTION I: INTRODUCTION AND OVERVIEW

### A. INTRODUCTION

The San Diego Housing Commission (SDHC) is pleased to submit the annual Moving to Work plan for Fiscal Year 2011. The document represents our second full year since reinstatement as a Moving to Work (MTW) demonstration agency. On December 30, 2009 SDHC received written approval from the Department of Housing and Urban Development (HUD) to move forward with amending the MTW Agreement to include broader uses of funds authority. The amendment to the standard agreement contained in Attachment D allows SDHC the authority to use MTW funds to provide housing assistance for low-income families without the restrictions of Section 8 or Section 9 regulatory funding requirements.

The MTW demonstration program allows Public Housing Authorities (PHAs) to design and test various approaches for providing and administering housing assistance. Locally, the program is known as Moving Forward. HUD's three main objectives of the program are the following:

- ✓ Reduce cost and achieve greater cost effectiveness in Federal expenditures;
- ✓ Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people in obtaining employment and becoming economically self-sufficient; and
- ✓ Increase housing choices for low-income families.

Thus far, the initiatives implemented by SDHC in the Fiscal Year 2010 MTW Annual Plan have met with success and have been well received by the community at large. An update on the success of the individual initiatives will be discussed further in this plan with a full analysis to be presented in the Fiscal Year 2010 Annual Report.

For the agency's second MTW plan, an agency-wide Moving to Work Committee was formed for the purpose of fostering innovation, creating viable strategies to further the agency's objectives, and constructing cutting edge MTW initiatives that go beyond reforming the Section 8 program.

The Fiscal Year 2011 MTW Annual Plan embodies the collaboration of multiple departments within the agency and includes initiatives that will dramatically increase the ability of SDHC to provide affordable housing solutions to the community.

SDHC elects to continue to be exempt from SEMAP and PHAS submission and scoring per Section II G. of the MTW Agreement.

### B. GOALS AND OBJECTIVES

SDHC seeks to fulfill the three statutory objectives of the MTW demonstration program by meeting the following goals:

- ✓ Address the issue of homelessness in San Diego by creating solutions that recognize the unique conditions of being homeless in the City of San Diego
- ✓ Further streamline processes in the Rental Assistance Department to increase cost effectiveness



- ✓ Increase affordable housing options in the City of San Diego
- ✓ Maintain affordable rent levels in both assisted and non-assisted units
- ✓ Offer solutions to families seeking to move toward self-sufficiency

Our agency expects to achieve each goal in part through the initiatives presented in the Fiscal Year 2011 MTW Annual Plan. Realizing these goals will further advance SDHC towards achieving our overall long term objectives of:

- (1) Expanding the number of affordable housing units within the city;
- (2) Enhancing and further streamlining the HCV and public housing programs; and
- (3) Providing new housing solutions for San Diego's homeless population.

Future MTW Annual Plans will contain initiatives created with the intent of reaching our goals and objectives, thus reflecting our commitment to the community and the housing needs of San Diego families.

Following is a brief summarization of each proposed initiative as a quick point of reference.

1. *Allow lower rents for non-assisted units in SDHC-owned developments.* SDHC requests authorization to use a revised rent reasonableness protocol to determine rent reasonableness for assisted units in SDHC-owned developments. Rent reasonableness for the voucher assisted units will be determined by comparisons to similar units in the surrounding neighborhoods rather than within the development. The initiative will increase the number of unassisted affordable units in San Diego for low-income families who cannot afford higher rents.
2. *Authorize commitment of PBV to SDHC-owned units.* The acquisition and improvement of some of SDHC-owned units could be augmented by the commitment of PBV. SDHC is requesting that the process of committing PBV to agency-owned units be streamlined.
3. *Two year occupancy term for PBV tenants before eligible for a voucher.* The proposed initiative will require Project Based Voucher holders to complete two years of occupancy before becoming eligible to receive a tenant-based voucher. Current regulations require a one-year waiting period. The proposed initiative increases the mandatory waiting period to two years in order to reduce costs, promote self-sufficiency, and increase housing choices for those families on the HCV waiting list.
4. *Acquisition of additional affordable units.* SDHC proposes to use broader uses of funds authority under the MTW program to acquire affordable housing units in San Diego using MTW funds. The initiative will offer enhanced housing choices for low-income residents of San Diego and will not be limited to Housing Choice Voucher program participants.
5. *Disregard Retirement Accounts.* The Fiscal Year 2010 MTW annual plan outlined efforts designed to streamline the methods required to verify program participant's income and assets with the goal of achieving greater cost effectiveness of Federal expenditures. This proposed initiative will further streamline internal processes as well as encourage self-sufficiency by authorizing SDHC to disregard retirement accounts when verifying an applicant or participant's assets.



6. *Modify EIV Income Report Review Schedule.* Effective January 31, 2010 HUD is requiring the use of the EIV Income Information Report with all mandatory certifications. SDHC requests permission to utilize the EIV report once per year during the annual certification cycle. The EIV used for the purposes of the annual certification will be used during any subsequent certifications occurring prior to the next scheduled annual certification.
7. *Development of Public Housing Units Using a Combination of Funds.* SDHC requests HUD approval to use MTW funds in conjunction with Replacement Housing Factor Funds (RHF) to develop public housing units during Fiscal Year 2011. SDHC anticipates acquiring and rehabilitating an additional 30 public housing units by June 30, 2011. The initiative will increase housing choices for low-income families.
8. *Sponsor-Based Vouchers for the Homeless.* In an effort to help address the problem of homelessness within the City of San Diego, SDHC requests permission to implement a sponsor-based voucher program geared toward reducing instances of homelessness. Approximately 100 vouchers will be used to provide sponsor-based housing to individuals identified as homeless. Program participants would receive housing and supportive services from a designated service provider.
9. *Enhance Family Self-Sufficiency Program.* Family Self Sufficiency (FSS) services are offered to Housing Choice Voucher participants as a means for achieving economic self-sufficiency during the course of program participation. Current regulations require the family's head of household to participate in the FSS program in order for other adult household members to be eligible to participate in FSS activities. SDHC is requesting the authority to permit all adult household members to enroll in the FSS program regardless of familial status. The initiative will promote self-sufficiency by extending program benefits and opportunities to a broader population of households.
10. *Broader Uses of Funds for Individual Development Accounts (IDAs).* Asset building programs are offered to rental assistance participants seeking to save money and build capital. IDAs are a component of the asset building programs offered by SDHC. IDAs are funded through federal funds which restrict fund usage to prescribed eligibility guidelines. Local funds are also utilized to fund IDAs for program participants determined ineligible for IDAs per federal regulations. SDHC is requesting authorization to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.

### MTW INITIATIVE UPDATE

In the Fiscal Year 2010 MTW Annual Plan, SDHC proposed ten initiatives for implementation beginning July 1, 2009. Additionally, HUD provided authorization for the creation of an Economic Development Academy (EDA) in Fiscal Year 2009. SDHC has not yet completed a full analysis of the metrics associated with each initiative, however, SDHC would like to take the opportunity to highlight the progress of selected Fiscal Year 2010 initiatives.

- ✓ The Triennial Recertification Cycle initiative designed for households on fixed incomes was implemented effective October 1, 2009 and applied to the February 2010 annual certification cycle. There are approximately 4,179 elderly and/or disabled participants currently assigned to the triennial recertification cycle.



- ✓ The Choice Communities initiative, a four-pronged approach to encourage MTW families to move to low-poverty areas, commenced on January 1, 2010 with the implementation of the Moving for Opportunity, Security Deposit, and 40% Affordability Cap Elimination programs components of the initiative. For families choosing to move into one of nine low poverty areas in San Diego, packets containing information about the Choice Communities are available, along with a Security Deposit Assistance program and a waiver of the 40% Affordability Cap. The last and most significant element to the approach, increased payment standards for MTW participants moving to low-poverty areas, begins June 1, 2010.
- ✓ Simplification of the income and asset verification systems was effectively implemented October 1, 2009 and applied to the February 2010 annual certification cycle. All interim, move, and intake certification received or seen on October 1, 2009 and thereafter were processed utilizing the new approach to the verification hierarchy. Annual certification forms were revised to reflect the changes. Both staff and participant families have reported on the benefits of this simplification initiative.
- ✓ A Housing Choice Voucher Homeownership Program, “Home of Your Own”, was implemented effective October 1, 2009. During implementation, families with an income level conducive to successful homeownership were identified and sent informational flyers outlining the program. SDHC’s website also has information, a pre-qualification checklist, and application for the program. To date, three families are proceeding through the eligibility process of the program while there are eight applications in the initial review process. Applications continue to be received and processed.
- ✓ SDHC has finalized the design and pre-construction phase of the Economic Development Academy (EDA). The EDA is expected to open October 1, 2010. As a means to provide services to participants while construction takes place, SDHC has been sponsoring limited EDA activities in its central office as well as utilizing two off-site facilities for workshops on workforce preparation, computer skills, and financial skills education.

## SECTION II: GENERAL SDHC OPERATING INFORMATION

### A. HOUSING STOCK INFORMATION

1. Number of public housing units – 75
2. SDHC does not have any planned significant expenditures for a development exceeding 30% of the Agency’s total budgeted capital expenditures for Fiscal Year 2011.
3. New public housing units – 30
4. Number of public housing units to be removed – 0
5. Number of MTW HCV units authorized – 13,300
6. Number of non-MTW units authorized – 513
7. Number of HCV units to be project-based – SDHC plans to project-base a combination of SDHC-owned units and non-SDHC-owned units for a total of 250 units in Fiscal Year 2011. All non-SDHC-owned projects will be identified through a competitive process that is expected to begin in the fall of 2010.



**B. LEASING INFORMATION PLANNED**

1. Anticipated total number of MTW public housing units leased in Plan year – 105
2. Anticipated total number of non-MTW public housing units leased in Plan year – 0
3. Anticipated total number of MTW HCV units leased in Plan year – 13,300
  
4. Anticipated total number of non-MTW units leased in Plan year – 513
5. SDHC historically has maintained a near 100% lease-up rate in its programs. Due to the housing crisis in San Diego, it is not expected that there will be any potential difficulties in leasing public housing or HVC units.
6. *Optional:* Number of project-based vouchers at start of plan year - 106

**C. WAITING LIST INFORMATION**

SDHC will continue to have community-wide waiting lists for the HCV and public housing programs. Project-based developments designated as supportive service providers will maintain their own individual waiting lists to match their target population.

As anticipated, the Section 8 waiting list significantly grew this year from 39,795 in 2009 to a current total of 45,231. The public housing waiting list was 16,200 last year and has not significantly changed in the past 12 months.

SDHC will conduct an analysis in Fiscal Year 2011 to determine the practicability of purging and closing the list and then reopening it at a future date.

**SECTION III – NON-MTW RELATED HOUSING AUTHORITY INFORMATION (OPTIONAL)**

- A. List planned sources and uses of other HUD or of Federal Funds-exclude HOPE VI – N/A
  
- B. SDHC is currently in the process of requesting regulatory and statutory waivers from the Housing Voucher Management and Operations Division of HUD for administration of the HUD-VASH Voucher Program. This will allow the VASH voucher participants the flexibilities and opportunities afforded by the MTW program and allow SDHC to administer its HUD-VASH vouchers in a more streamlined and effective manner by mirroring the administration of its MTW vouchers. VASH funding will not be combined with MTW block grant funding.

**SECTION IV – LONG-TERM MTW PLAN (OPTIONAL)**

As we mark the beginning of our second year as a reinstated MTW agency, SDHC is energized and ready to continue to utilize the flexibility this progressive program provides. MTW allows SDHC to continue to bring innovative solutions to the significant housing-related issues facing our community while concurrently streamlining organizational processes.

SDHC is proud of what we have accomplished in our first year as MTW. Our initial annual plan was unquestionably ambitious, yet by the end of our first year, we will have been successful in



implementing nearly all of the initiatives in our first plan, building enhanced programs for our clients as well as creating brand new programs designed to provide these families with more choices in affordable housing and new opportunities to move towards self-sufficiency.

As we look forward to the next eight years of our MTW contract, we intend to use the power of the program to focus on three objectives:

- Attain new affordable units within the city;
- Enhance and further streamline the HCV and public housing programs; and
- Provide new housing solutions for the city's homeless population.

#### *Attain New Affordable Units within the City*

In future years, as the agency receives additional Replacement Housing Factor funds, the focus will be to leverage those funds with Section 8 funds to acquire additional family units for operation under the public housing program. Neither program alone would have sufficient funds to make an impact in this area.

The units acquired will serve very low-income families and help to provide decent, safe, and sanitary housing options in a high housing cost area such as San Diego. In high cost areas, very low-income families often have no choice but to reside in overcrowded situations in order to be able to afford rent. Adding family units to SDHC's public housing inventory will provide additional housing choices for these families.

Broader uses of funds authority will allow MTW funds to supplement other funding sources to enable SDHC to acquire additional affordable housing units over the next few years. These units will be available to both assisted and non-assisted families, greatly increasing affordable housing opportunities in the City of San Diego.

*Enhance and Further Streamline the HCV and Public Housing Programs* SDHC has implemented numerous initiatives designed to streamline operations and improve these two rental assistance programs for the families that are served by them. These include initiating a triennial recertification cycle for elderly and disabled households on fixed income and the establishment of a more efficient verification process that allows clients to provide reliable verification that is more accessible and generally more dependable than previously required.

Further, SDHC has enhanced the HCV program by creating the "Home of Your Own" voucher-based homeownership program and the "Choice Communities" program designed to provide incentives to families that encourage moves from high-poverty areas to low-poverty areas.

Looking to the future, SDHC sees a great opportunity for further streamlining and enhancing these essential programs, including reform designed to encourage and reward families that make efforts toward become more economically self-sufficient.

#### *Provide New Housing Solutions for the City's Homeless Population*

Current estimates indicate approximately 4,300 residents of the City of San Diego are either unsheltered (42 percent), living in emergency shelters (16 percent), or living in transitional housing programs (42 percent). Of these, approximately 15 percent are chronically homeless persons who account for at least 50 percent of the cost of public services for homeless individuals and families. The single family shelter in the City is over-subscribed; there is no year-round program for single adults. In conjunction with the City of San Diego, the County of San Diego, and several



regional service provider organizations, SDHC is working to reduce the number of homeless persons in our region and reduce the cost associated with unsheltered residents.

SDHC views project-based vouchers and sponsor-based vouchers as two key ingredients of successfully providing permanent supportive housing programs to the homeless. Permanent supportive housing is the key to reducing homelessness. SDHC will devote funds and other resources to programs and sites that provide housing and appropriate services to support successful tenancy for those who are unable to achieve or maintain it themselves. These activities will assist related efforts to prevent homelessness in the City.

Program participants and community constituencies are vital to the success of SDHC’s long term goals. SDHC will make a concentrated effort to reach out to our clientele and our local partners in order to gain their ongoing input and support for future MTW plans. With future plans, SDHC is determined to use the MTW authority given, which allows the agency to reform and design programs specifically targeted to our local community, to its fullest potential.

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

Proposed MTW Activities			
Proposed MTW Activity	Statutory Objective		
	Reduce Cost and Achieve Greater Cost Effectiveness	Encourage Self Sufficiency	Increase Housing Choices
<b>Fiscal Year 2011 (July 1, 2010 to June 30, 2011)</b>			
1. Allow SDHC to charge lower rents for non-assisted units in SDHC-owned developments			X
2. Authorize commitment of PBV to SDHC-owned units	X		X
3. Two year occupancy term for PBV tenants before eligible for a voucher	X		
4. Acquisition of additional affordable housing units in the City of San Diego			X
5. Disregard retirement accounts	X		
6. Modify EIV Income Report Review Schedule	X		
7. Development of public housing units using a combination of funds			X
8. Sponsor-Based Vouchers for the Homeless	X		X
9. Enhance FSS Program		X	X
10. Broader Uses of Funds for IDAs		X	X



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

SDHC requests authority to charge, in developments it owns, lower rents for non-assisted units than for units assisted by tenant-based or project-based vouchers in the same complex. This step would be taken in appropriate circumstances to preserve or create affordable units for low-income families by offering non-assisted units at below-market rents. Rent reasonableness for the voucher-assisted units in such complexes would be determined by comparisons to similar units in the surrounding neighborhoods, rather than in the developments. The main advantages of this initiative are that multiple rent levels allow SDHC to operate a development with a stable cash flow, keeping the property solvent, while allowing for more affordable housing opportunities in the City.

SDHC owns 1,366 former public housing units, which are restricted to households with incomes at initial occupancy that do not exceed 80 percent of area median income (AMI). In some circumstances, to promote affordability, SDHC seeks authority to charge rents for unassisted units that are below the “reasonable rent” charged for voucher-assisted units in those complexes. In effect, some rent levels on existing non-assisted units may be lowered. The proposed authorization would enable it to do so without compromising allowable voucher contract rents, thus increasing affordability of the unassisted units and housing choice for low-income families.

Additionally, SDHC recently acquired a historic downtown hotel that houses senior citizens at below market rents. The 130 unit development was sold because the previous owner was operating at a deficit and could no longer support the development, but did not want to raise rents for her low-income tenants. SDHC intends to commit 39 PBV to the development, which will improve operating cash flow. In this development, after extensive rehabilitation, SDHC will set the PBV contract rents at market rates, but does not want to raise the rents for current tenants that do not receive rental assistance. For future developments SDHC would be able to take non-assisted units and lower existing rent amounts to create affordable units or maintain existing affordable rents, depending on the specific situation. The approval of this initiative would preserve 91 units of affordable housing in this complex alone, and would allow for the duplication of this model in the future, preserving or creating additional affordable housing throughout the City.

Multiple rent levels within a complex regularly occur in mixed-finance communities where rents are restricted according to funding sources and each source’s prescribed policies. For example, there is an affordable housing development in San Diego which rents 1 bedroom units with contract rents ranging from \$400 to \$757 per month, depending on the funding source restrictions. In the open market, unit rents also vary greatly; a unit offered for rent today may have a higher contract rent than a comparable unit in the same complex that was rented five years ago. For similar reasons, it is unavoidable in a community where some residents are assisted with vouchers and some are not. By using a rent reasonableness process where rents for voucher-assisted units are determined by comparisons to similar units in the surrounding area rather than within the complex, SDHC will have the power to offer non-assisted units at lower contract rents. This MTW activity will reduce the rent burden disparity between those with voucher assistance and unassisted tenants. The rent burden for both groups will be more equalized and SDHC will have the opportunity to provide housing for an increased number of low-income families through both voucher assistance and SDHC-owned affordable housing.



Note: This authority is requested for developments owned by SDHC and by SDHC's limited liability companies.

**Relation to Statutory Objectives:** Increases housing choices for low-income families.

**Anticipated Impact:** With respect to the former public housing complexes currently owned by SDHC, SDHC could use this mechanism to make units not assisted by tenant-based or project-based vouchers more affordable to low-income families, without compromising rent reasonableness determinations for voucher-assisted units. SDHC is proposing to set rent levels for tenant-based and/or project-based units that will allow SDHC to continue to maintain affordable rents for unassisted units in order to serve additional very low to low-income families without voucher assistance. This may mean either maintaining existing affordable rents or lowering existing rent levels to promote affordability. The number and percentage of extremely low, very low, and low-income families moving into SDHC-owned non-assisted units will be tracked over the entire fiscal year to determine whether the activity is achieving the goal of increasing housing opportunities for low-income families. No benchmark is set for the number and percentage of the groups as we are not targeting a specific income level at this point.

**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Number of non-assisted SDHC-owned units with rents below assisted unit rents is 0.
- Total number of developments participating in this initiative 0.

*Benchmarks:*

- Number of non-assisted SDHC-owned units with rents below assisted unit rents will be 150 by June 30, 2011.
- Number of developments participating in this initiative will be 3 by June 30, 2011.

*Metrics:*

- Annual number of SDHC-owned non-assisted units with rents below assisted unit rents.
- Annual number of developments participating in this initiative.
- Annual number and percentage of extremely low-income families moving into SDHC-owned non-assisted units, out of all new families.
- Annual number and percentage of very low-income families moving into SDHC-owned non-assisted units, out of all new families.
- Annual number and percentage of low-income families moving into SDHC-owned non-assisted units, out of all new families.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



Allow Higher Rents for Voucher Assisted Units						
Metric	Baseline 2010	QTD (#)	YTD (#)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of non-assisted units with rents below assisted unit rents	0			150	6/30/2011	
Annual number of developments participating in initiative	0			3	6/30/2011	
Annual number of extremely low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	
Annual number of very low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	
Annual number of low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	
Annual percentage of extremely low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	
Annual percentage of very low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	
Annual percentage of low-income families moving in to SDHC-owned non-assisted units	0			N/A	N/A	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section D(2)(a) containing waivers of Section 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8 (o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503, and 982.518. MTW Agreement Attachment C, Section D(2)(c) containing waivers of Section 8(o)(10) of the 1937 Act and 24 CFR 982.507. MTW Agreement Attachment C, Section D(7)(b) containing waivers of 24 CFR 983.51.

**2. AUTHORIZE COMMITMENT OF PBV TO SDHC-OWNED UNITS**

SDHC owns 1,366 former public housing units. Occupancy of these units is restricted to households with incomes at initial occupancy that do not exceed 80 percent of AMI. Where a unit is not occupied by a household with a tenant-based voucher, SDHC is able to serve only those able to afford full contract rent. These households’ incomes are significantly over the average income of households that would be served through this initiative. The preservation and improvement of some of these units could be augmented by the commitment of PBV, and all PBV units will be subject to the requirements of HQS. SDHC requests the authority to commit PBV to SDHC-owned



properties without the need to be competitively bid, as stated in Attachment C, and without going through an approval process with HUD. Where SDHC commits PBV, SDHC rather than an independent entity would perform rent reasonableness and HQS inspection tasks, as SDHC has already been authorized to do for its own units subsidized by tenant-based vouchers.

**Anticipated Impact:** The commitment of PBV to some of these units will allow additional families with extremely low incomes to be served by SDHC-owned housing. The commitment of PBV to some of the units will also contribute to the preservation and improvement of those units as low-income housing. Use of SDHC staff rather than an independent entity for rent reasonableness and inspection functions will reduce costs.

**Relation to Statutory Objectives:** Increase housing choices for low-income families. Reduce cost and achieve greater cost effectiveness in Federal expenditures.

### **Baselines, Benchmarks, and Metrics:**

#### *Baselines:*

- Number of PBV committed to SDHC-owned units is 0.
- Average income of households served by PBV in SDHC-owned units is \$0, as there are currently no PBV in SDHC-owned units.
- Average cost of inspection and rent reasonableness performed by a contractor is \$29.
- Average cost of inspection and rent reasonableness performed by SDHC is \$23.
- Number of inspections and rent reasonableness performed by SDHC for PBV in SDHC-owned units is 0.

#### *Benchmarks:*

- Number of PBV units committed to SDHC-owned units will be 50 by June 30, 2011.
- Annual cost savings for inspections and rent reasonableness performed by SDHC versus a contractor for PBV in SDHC-owned units is at least \$300 by June 30, 2011.

#### *Metrics:*

- Number of PBV units committed to SDHC-owned units.
- Annual number of inspections and rent reasonableness performed by the SDHC for PBV in SDHC-owned units.
- Annual financial savings realized by using in-house staff to conduct rent reasonableness and inspections on SDHC-owned units.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



PBV: Authorize Commitment of PBV to SDHC Owned Units								
Metric	Baseline 2010	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Number of PBV units committed to SDHC-owned units	0					50	6/30/2011	
Annual number of inspections and rent reasonableness performed by SDHC for PBV in SDHC-owned units	0					N/A		
Annual financial savings realized by using in-house staff to conduct inspections on SDHC-owned units	\$0					\$300	6/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section D(7)(a) containing waivers of Section 8(o)(13)(B and D) of the 1937 Act and 24 CFR 982.1, 982.102, and Part 983. MTW Agreement Attachment D, authorization to conduct inspections and rent reasonableness determinations for Agency-owned units directly, without engaging an independent third party.

**3. REQUIRE OCCUPANCY IN PBV DEVELOPMENTS FOR TWO YEARS BEFORE HOUSEHOLDS BECOME ELIGIBLE TO AVAILABLE TENANT-BASED VOUCHERS**

This proposal would retain households’ mobility option if they are housed with PBV, but after a longer period than program rules otherwise require. SDHC requests the authority to undertake this activity for all PBV developments, except those designated as transitional housing. The annual turnover rate for PBV families is 30 percent, averaged over the last four years.

**Anticipated Impact:** This MTW activity will help to stabilize occupancy at PBV developments that otherwise may be subjected to high turnover rates as households leave after one year of occupancy in order to obtain a tenant-based voucher. This will also reduce the administrative costs for SDHC in processing changes in PBV tenancy thus achieving greater cost effectiveness in Federal expenditures. An undesirable outcome may be that some PBV residents may have compelling reasons to move prior to two years of occupancy, but would no longer be eligible to an available voucher before that time.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Baselines, Benchmarks, and Metrics:**

The following baselines, benchmarks, and metrics are predicated upon an anticipated baseline of 250 PBV units under lease.





*Baselines:*

- Total percentage of families who are required to remain in PBV units more than 12 months before receiving tenant-based voucher is 0%.
- Annual percentage of PBV families who moved with a tenant-based voucher in calendar year 2009 is 17%.
- Annual percentage of families who vacate PBV units before eligible for a voucher in calendar year 2009 was 22%.
- Average annual turnover rate for PBV units is 30% (2006-2009).
- Staff time required to handle turnover of PBV units is .4 FTE.

*Benchmarks:*

- 100% of PBV developments with contracts beginning July 1, 2010 and after will include this requirement in the contracts.
- 50% reduction in annual turnover rate in PBV units by June 30, 2012.
- Staff time required to handle turnover of PBV units will be .2 FTE by June 30, 2012.
- Annual administrative savings due to reduction in processing tenancy changes in PBV units will be \$9,152 by June 30, 2012.

*Metrics:*

- Annual percentage of families who vacate PBV units before eligible for a voucher.
- Annual percentage of PBV families who move with a tenant-based voucher.
- Percentage of PBV developments with contracts beginning July 1, 2010 and after with this contractual requirement.
- Average annual turnover rate for PBV units.
- FTE required to handle turnover of PBV units.
- Annual administrative savings due to reduction in processing tenancy changes in PBV units.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



Two Year Occupancy Term for PBV Tenants Before Eligible for a Tenant-Based Voucher								
Metric	Baseline 2010	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual percentage of families who vacate PBV units before eligible for a voucher	22%					N/A		
Annual percentage of PBV families who move with a tenant-based voucher	17%					N/A		
Percentage of PBV developments with contracts beginning 7/1/2010 and after with this contractual requirement	0%					100%	N/A	
Average annual turnover rate for PBV units	30%					50% reduction	6/30/2012	
FTE required to handle turnover of PBV units	.4					.2	6/30/2012	
Annual administrative savings due to reduction in processing tenancy changes in PBV units	\$0					\$9,152	6/30/2012	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section D(4) containing waivers of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 CFR 982 Subpart E, 982.305, and 983 Subpart F. MTW Agreement Attachment C, Section D(7)(a) containing waivers of Section 8(o)(13)(B and D) of the 1937 Act and 24 CFR 982.1, 982.102, and Part 983.

**Hardship Policy:** SDHC will include in its Administrative Plan the following hardship policy for those families who present a compelling reason to move out of the PBV unit and receive a tenant-based voucher prior to fulfilling the 24 month occupancy requirement.

Families who present a compelling reason to move from the PBV unit and receive a tenant-based voucher prior to fulfilling the 24 month occupancy requirement will be reviewed on a case-by-case basis. The case will go before the Vice President of Rental Assistance or designee and approval to move with a tenant-based voucher may be granted. Circumstances surrounding the request to move, such as VAWA requirements, employment opportunities in other PHA jurisdictions, and availability of tenant-based vouchers will be considered as part of the determination.

#### 4. ACQUISITION OF ADDITIONAL AFFORDABLE HOUSING UNITS IN THE CITY OF SAN DIEGO

SDHC proposes to acquire additional affordable housing units under MTW. These units will be acquired as affordable housing units, not public housing units and therefore will not require an operating subsidy. This initiative would allow SDHC to use its MTW funds to provide low-income families the opportunity to reside in safe, decent, and sanitary housing paying affordable rents.



These affordable housing units can be any bedroom size and will be located within the City of San Diego and may be acquired by SDHC to be rented to families at or below 80% AMI. SDHC intends to allow eligible low-income families to reside in these units, including those that may be receiving Section 8 rental assistance. If rented to a Section 8 family, the unit would fall under HQS inspection requirements, otherwise HQS requirements would not apply. Please note SDHC does not intend to reduce the number of vouchers it administers in order to fund this initiative; its desire is to increase housing choices for low-income families using as many avenues as possible.

The broader uses of funds authority under MTW makes this initiative possible as HCV funds can be used to serve a greater number of families residing within the City of San Diego. These units may house both families who are MTW Housing Choice Voucher participants and families who are not currently receiving other types of rental assistance.

The need is great for affordable units in the City of San Diego. In the future, using broader uses of funds authority, SDHC will be able to acquire additional properties using MTW funds in combination with other funds to preserve and increase the number of affordable housing units in the City of San Diego. This flexibility will allow scarce local resources to be used for other purposes.

**Anticipated Impact:** The anticipated impact of this initiative will be that additional affordable housing units will be created in the City of San Diego, thereby increasing housing choices for low-income families.

**Relation to Statutory Objectives:** Increase housing choices for low-income families.

**Baselines, Benchmarks, and Metrics:** The success of this activity will be measured by how many additional affordable housing units are acquired. *Note:* This activity is largely influenced by HUD funding levels and market conditions.

*Baselines:*

- Current number of affordable housing units owned by SDHC is 1,778.

*Benchmarks:*

- Increase the number of affordable housing units owned by SDHC by 200 for a total of 1,978 by June 30, 2011.

*Metrics:*

- Number of affordable housing units owned by SDHC.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a quarterly basis. The report will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist us in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:



San Diego SDHC Additional Affordable Housing Units						
Metric	Baseline 2009	QTD (#)	YTD (#)	Benchmark	Anticipated Benchmark Completion Date	On Track to Reach Goal (Y or N)
Number of affordable housing units owned by SDHC	1,778			1,978	6/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment D, Broader Uses of Funds.

**5. DISREGARD RETIREMENT ACCOUNTS IN ASSET CALCULATION**

SDHC received authorization from HUD in the Fiscal Year 2010 MTW Annual Plan to streamline the income and asset verification systems. The multifaceted initiative primarily simplified income and asset verification methodology by restructuring the verification hierarchy. A component of the restructured verification hierarchy excluded a participant’s assets when the total combined cash surrender value of household assets equals less than \$10,000. Currently, 784 rental assistance participants are reporting retirement accounts. However, once the \$10,000 asset disregard streamlining measure cycles through an entire year, approximately 214 families would have documented retirement accounts. In an attempt to further streamline processes and reduce overall staff time required to complete the certifications, SDHC proposes to disregard retirement accounts when determining a participant’s asset income.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Anticipated Impact:** The asset income from retirement accounts will no longer be utilized for purposes of calculating the tenant rent portion. SDHC expects the increase in HAP from the implementation of this initiative to be negligible. The impact of increased HAP will be balanced by the staff time saved during the verification and certification process.

**Baselines, Benchmarks, and Metrics:**

*Baselines:*

- Total number of families with retirement accounts is 214.
- .14 FTE required to verify retirement accounts.
- Total annual asset income from retirement accounts is \$109,668.

*Benchmarks:*

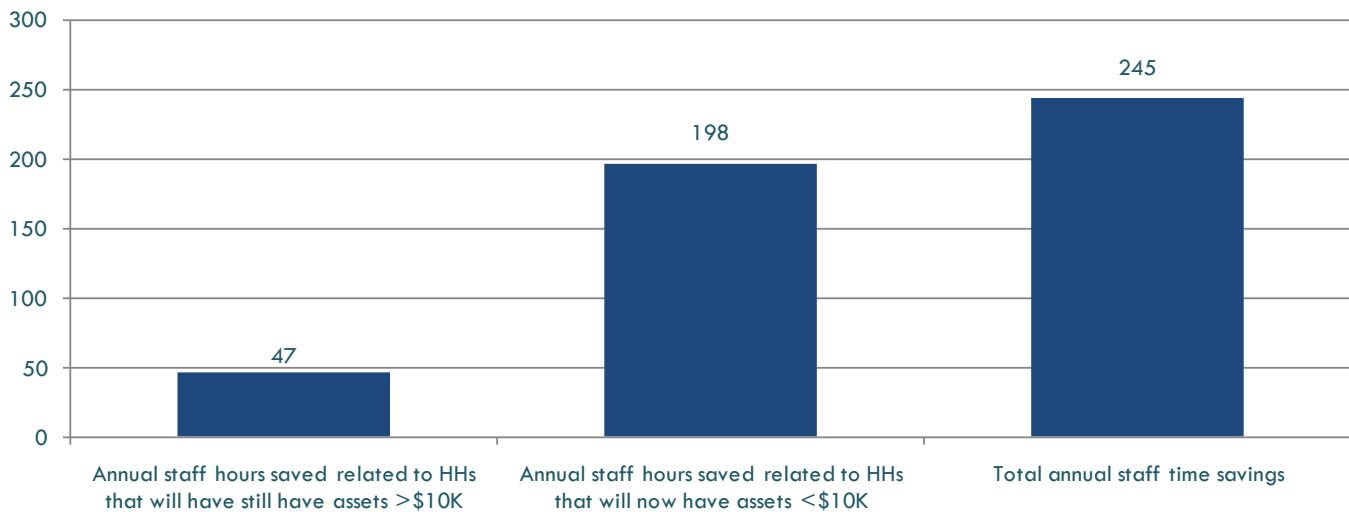
- 0 FTE required to verify retirement accounts by June 30, 2011.

*Metrics:*

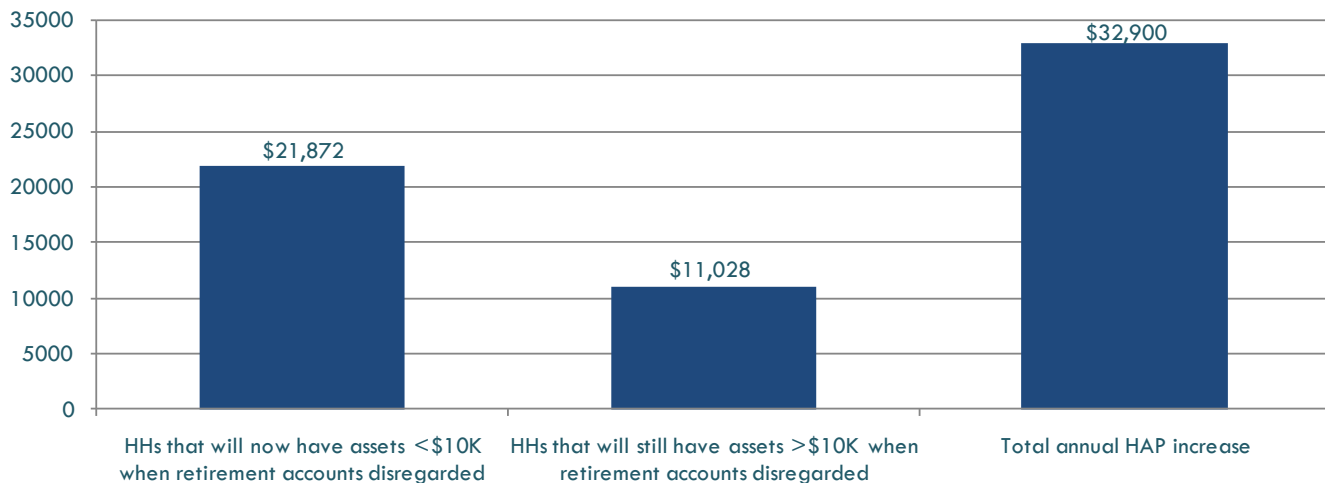
- Annual FTE required to verify retirement accounts.



### Retirement Asset Disregard Time Savings Analysis



### Retirement Asset Disregard HAP Impact Analysis



**Potential Undesirable Outcomes:**

SDHC may experience a marginal increase of approximately \$32,900 in Housing Assistance Payments due to the change in asset calculation. By disregarding retirement accounts, families who hold retirement accounts and previously reported assets exceeding the \$10,000 threshold may fall underneath this threshold when these assets are not used in the calculation. Due to the number of components that go into the HAP cost calculations, there are too many variables to isolate the effect the lost asset income will have in subsequent years.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports



describing the above metrics will be developed and analyzed on a quarterly or annual basis. The report will summarize the data on a quarter-to-date and year-to-date basis as it applies to the metric. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Retirement Account Disregard Initiative								
Metric	Baseline 2009	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual FTE required to verify retirement accounts	.14					0	6/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section C(4) containing waivers of Section 3(a)(1) and 3(a)(2) of the 1937 Act and 24 CFR 966.4 and 960.257. MTW Agreement Attachment C, Section D(1)(c) containing waivers of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516.

**Impact Analysis and Hardship Policy:** An impact analysis was completed and it was determined that approximately 214 families will see a decrease in their rent portions due to the implementation of this initiative. A hardship policy is not required as the impact to participants is a lower family share of rent.

## 6. MODIFY EIV INCOME REPORT REVIEW SCHEDULE

Effective January 31, 2010 HUD implemented new regulations mandating the use of EIV as a third party source to verify tenant employment and income information during mandatory certifications. Prior to the issuance of the HUD notice advising agencies of the revision, utilizing the EIV income report for interim certifications was not required by HUD, only during annual certifications. The reinterpreted regulations concerning the use of the EIV changed the requirement such that review of the EIV income report is now a required component of all certification processes, including interim certifications.

The requirement to now use the EIV income report for all mandatory certifications (both annuals and interims) translates to additional staff time expended when processing interim certifications, which also renders an increase in costs linked to the staff time for accessing and reviewing the EIV income report. In an effort to reduce costs and use Federal funds more efficiently, SDHC requests authorization to modify the new EIV review schedule by reverting back to the original review schedule in place prior to January 31, 2010. Specifically, SDHC is requesting exemption from generating the EIV income report during interim certifications.

The requested modification is not prohibitive to staff's ability to identify unreported income when comparing the EIV report with the household income reported by the family during the annual certification process. Since the income information contained in the EIV at the time of the interim certification is oftentimes not up to date (the earnings information included on the EIV income report is generally delayed by two quarters), unreported income and patterns of undisclosed income are most likely to be identified during the annual certification process. Since the inception



of EIV, during the annual review process, staff have examined and compared all income information contained in the EIV report with the income reported by the family at all certifications which occurred during the preceding 12-month period. As the EIV review process has spanned several years, the comprehensive review identifies income that may not have been reported by the family at all previous certifications.

Files with any income discrepancies indicating possible unreported income are forwarded to the Program Integrity Unit (PIU) for a thorough assessment. A thorough analysis of the file by PIU staff identifies unreported income sources and allows SDHC to address the unreported income to the extent documentation exists to support follow-up with the family. Quality control auditing will continue to monitor that the appropriate administrative actions ensue when unreported income information is contained in the EIV report.

SDHC believes it is important to note the array of reports contained in the EIV system are regularly reviewed by the Quality Assurance team to assure compliance with Federal requirements. Through this initiative SDHC is not requesting modification for the use of EIV reports such as the deceased tenant report, summary of debts owed report, the social security validity report, etc. Rather, the request is centered on allowing the use of the EIV income report once per year during annual certification and waiving the requirement to use the report during interim certifications.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Anticipated Impact:** It is anticipated this initiative will reduce cost and achieve greater cost effectiveness by streamlining the EIV process. Through this modification, SDHC expects to utilize .5 FTE less for the EIV process. The savings of this staffing time will be assigned to program integrity activities.

#### **Baseline, Benchmarks, and Metrics:**

##### *Baselines:*

- Annual number of interim certifications is 6,150
- Time required to print, review, compare and bar code or index EIV separately per interim certification is 20 minutes.
- Annual staff costs to generate, review, compare, and bar code or index EIV per interim certification is 2050 hours or \$42,415.

##### *Benchmarks:*

- Total time expended to use EIV for interim certifications will be less than 1025 hours by June 30, 2011.
- Annual cost savings of \$21,207 or more by June 30, 2011.

##### *Metrics:*

- Annual number of interim certifications.
- Annual hours expended utilizing EIV for interim certifications.
- Annual cost savings using the modified EIV review schedule.



**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the data. Reports describing the above metrics will be developed and analyzed on a quarterly basis. The report will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist us in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Modify EIV Income Report Review Schedule						
Metric	Baseline 2010	QTD (#)	YTD (#)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of interim certifications	6,150			N/A		
Annual hours expended utilizing EIV for interim certifications	2050			<1025	6/30/2011	
Annual cost savings using the modified EIV review schedule	\$0			>\$21,207	6/30/2011	

**Authorization to Conduct the Activity:** MTW Agreement Attachment C, Section C(4) containing waivers of Section 3(a)(1) and 3(A)(2) of the 1937 Act and 24 CFR 966.4 and 960.257. MTW Agreement Attachment C, Section D(3)(b) containing waivers of 24 CFR 982.516 and 982 Subpart E.

**7. DEVELOPMENT OF PUBLIC HOUSING UNITS USING A COMBINATION OF FUNDS**

SDHC proposes to develop additional public housing units utilizing Replacement Housing Factor funds supplemented with MTW funds when necessary to complete the total development cost budget. The development method proposed is acquisition and rehabilitation. Due to the disposition of public housing units, SDHC is eligible to receive approximately \$2,000,000 of Replacement Housing Factor funds per year for a five year period. During Fiscal Year 2009, the amount of RHF funds received was \$2,005,429. In Fiscal Year 2010, SDHC utilized ARRA Capital funds for acquisition, supplemented by Replacement Housing Factor funds and other capital funds for the acquisition and rehabilitation of 39 family public housing units. SDHC proposes to develop a limited number of additional public housing units utilizing the Replacement Housing Factor funds that it will be receiving over the next four years supplemented with Section 8 funds. It is acknowledged that upon requesting an operating subsidy for the public housing units developed, future Replacement Housing Factor funds will be decreased in accordance with HUD’s formula.

**Relation to Statutory Objectives:** Increases housing choices for low-income families.

**Anticipated Impact:** The anticipated impact of this initiative is that it will allow additional very-low-income families to be housed in SDHC’s balanced affordable housing portfolio. This is made possible by the MTW flexibility of combining available funds to be used for acquisition and rehabilitation of additional units, along with a public housing operating subsidy.





**Baselines, Benchmarks, and Metrics:** The success of this proposal will be measured by the number of public housing units that can be developed within the funding made available. This activity is largely influenced by HUD funding levels.

*Baselines:*

- Current inventory of 75 public housing units.

*Benchmarks:*

- Add 30 Public Housing units during Fiscal Year 2011 for a total of 105 public housing units.

*Metrics:*

- Total number of public housing units owned by the SDHC.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the data. Reports describing the above metrics will be developed and analyzed on a quarterly basis. The report will summarize the data on a quarterly-to-date and year-to-date basis. Analyzing data on a frequent basis will assist us in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Development of Public Housing Initiative						
Metric	Baseline 2009	QTD (#)	YTD (#)	Benchmark	Anticipated Completion Date	On Track to Reach Goal (Y or N)
Number of public housing units owned by SDHC	75			105	6/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section C(4) containing waivers of Section 3(a)(1) and 3(a)(2) of the 1937 Act and 24 CFR 966.4 and 960.257. MTW Agreement Attachment C, Section D(1)(c) containing waivers of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516. MTW Agreement Attachment D; Broader Uses of Funds Authority.

**8. SPONSOR-BASED VOUCHERS FOR THE HOMELESS**

The objective of this program will be to work in partnership with non-profit sponsors to combine comprehensive supportive services with permanent housing using MTW flexibility along with Housing Choice Vouchers. Research shows the cost of housing a homeless person and keeping them housed is reduced if the housing is enhanced with supportive services. This innovative program will serve the homeless of San Diego who lack an adequate nighttime residence, live on the street, cannot afford market-rate housing and have disabilities and/or substance abuse issues.

SDHC will provide up to 100 zero-bedroom vouchers to house homeless persons, and sponsor organizations will provide the necessary services. Unit month counts will accumulate as with other MTW vouchers. Examples of services provided may include, but are not limited to, the following:

- Outreach
- Information & Referral



- Case Management
- Senior Services
- Food Services
- Job Skills Training/Education
- On Site Employment
- Transportation Vouchers
- Personal Financial management & budgeting
- Personal Hygiene training & services
- Health & Wellness Education
- Health Aide Services (Visiting nurse care)
- Dental Care
- Health Care
- Trauma Treatment
- Domestic Violence Services
- Legal Assistance and/or a homeless court
- Substance Abuse Counseling (Group & Individual)
- Mental Health Therapy (Group & Individual)

Sponsor-Based Vouchers (SBV) differ from Project-Based Vouchers by allowing the assistance to be attached to a sponsoring agency rather than the unit or development. In Project-Based voucher programs, the subsidy is tied to the unit and works well for owners of housing developments but is a disadvantage for sponsoring agencies who do not own properties. In the SBV program, sponsoring agencies have the option use their own units to house participants or may locate units to be master-leased. A typical sponsor would be an organization that provides supportive services to disabled individuals and/or individuals with substance abuse issues and needs additional housing resources to serve more clients.

*Sponsor Selection:* Initially, SDHC will publish a Request for Qualifications to select participating sponsors. If this process does not solicit an adequate response, SDHC will select sponsors based on a non-competitive process.

### **Program Requirements**

*Waiting Lists:* Sponsors will create and maintain site-based waiting lists. In creating these waiting lists, sponsors will receive input from SDHC on rating and ranking of the applicants to ensure compliance with Fair Housing laws. In addition, SBV participants will be required to apply for and remain on SDHC's tenant based waiting list in order to transfer to the tenant based voucher program.

*Inspections:* SDHC will conduct Housing Quality Inspections (HQS) for each unit leased by an SBV program participant.

*Administration:* Sponsors will provide program administration, including all eligibility and income determinations, rent calculations, interim and annual certifications. SDHC will train sponsors on SBV program requirements. The SBV program will mirror the Housing Choice Voucher rules for income eligibility and rent calculations. The sponsors will be required to have a program plan that will define eligibility factors, leasing requirements, and termination policies and procedures. Sponsors will develop written service protocols and define how they will conduct client management. A written service plan will be maintained for each participant in the SBV program.



*Monitoring:* SDHC will provide program oversight and evaluation and monitor the sponsor for compliance with program requirements. The sponsor will utilize their own software to manage the clients' case management. Each sponsor will be required to submit semi-annual written reports on their program. SDHC will collect client data from the sponsors and transmit data to PIC program reporting system. The amount of SBV housing subsidies paid will also be tracked by SDHC.

**Relation to Statutory Objectives:** Reduce cost and achieve greater cost effectiveness in Federal expenditures. Increase housing choices for low-income families.

**Anticipated Impact:** The anticipated impact of this program will be to reduce the number of unsheltered households in San Diego and provide needed services to increase their incomes, enhance their stability and increase housing choices. By shifting specific administrative functions to the sponsor, SDHC will reduce cost and achieve greater cost effectiveness in Federal expenditures.

**Potential Undesirable Outcomes:** By awarding vouchers to sponsors to house the homeless, other applicants on the tenant-based waiting list may perceive that SBV participants have circumvented the long wait for the tenant based voucher. Although SDHC recognizes these possible issues, research shows tenant-based waiting lists are housing barriers for homeless disabled persons. For people in this situation, the long wait for a tenant-based voucher exacerbates the potential for deterioration and permanent damage to physical and mental health, thus ultimately increasing public sector costs. Due to the long wait times for tenant-based vouchers and the lack of stable housing, these applicants may never reach the top of the waiting lists and are often dropped from the waiting lists for "no contact".

#### **Baselines, Benchmarks, and Metrics:**

##### *Baselines:*

- Current number of program participants is 0.
- Current number of participants who remained housed after 3 months is 0.
- Current number of participants who remained housed after 6 months is 0.
- Current number of participants who remained housed after 9 months is 0.
- Current number of participants who remained housed after 12 months is 0.
- Current number of participants who are permanently housed after 1 year is 0.

##### *Benchmarks:*

- Select sponsors to administer the Sponsor-Based Voucher program by July 1, 2011.
- Percent of participants who remained housed after 3 months will be 80% by June 30, 2012.
- Percent of participants who remained housed after 6 months will be 70% by June 30, 2012.
- Percent of participants who remained housed after 9 months will be 60% by June 30, 2013.
- Percent of participants who remained housed after 12 months will be 50% by June 30, 2013.
- Average length of program participation will be at least 1 year by June 30, 2013.
- House 100 homeless persons by June 30, 2013.

##### *Metrics:*

- Annual number of program participants.



- Annual percentage of participants who remained housed after 3 months.
- Annual percentage of participants who remained housed after 6 months.
- Annual percentage of participants who remained housed after 9 months.
- Annual percentage of participants who remained housed after 12 months.
- Average length of program participation.
- Annual number of families receiving an MTW housing choice voucher and leaving the SBV program.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** An electronic database will be developed to store the rudimentary data. Reports describing the above metrics will be developed and analyzed on a monthly basis. The report will summarize the data on a month to date and year to date basis. Analyzing data on a frequent basis will assist us in quantifying results and identifying opportunities for continuous improvement in the program. Below is a draft proposal of the report:

Sponsor-Based Vouchers for the Homeless								
Metric	Baseline 2010	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of program participants	0					100	6/30/2013	
Percentage of program participants remaining housed 3 mo.	0					80%	6/30/2012	
Percentage of program participants remaining housed 6 mo.	0					70%	6/30/2012	
Percentage of program participants remaining housed 9 mo.	0					60%	6/30/2013	
Percentage of program participants remaining housed 12 mo.	0					50%	6/30/2013	
Number of participants remaining housed after 12 months	0					50	6/30/2013	
Average length of program participation	N/A					At least 1 year	6/30/2013	
Annual number of families receiving an MTW housing choice voucher and leaving the SBV program	0					N/A	N/A	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section D(1)(c) containing waivers of Section 8(o)(5) of the 1937 Act and 24 CFR 982.516. MTW Agreement Attachment D, Broader Uses of Funds.



## 9. ENHANCE THE FAMILY SELF SUFFICIENCY PROGRAM TO ALLOW SDHC TO ENTER INTO CONTRACT OF PARTICIPATION AGREEMENTS WITH ADULT NON-HEAD OF HOUSEHOLDS.

HUD regulations restrict SDHC from executing Family Self Sufficiency (FSS) Contracts of Participation (COP) with anyone other than a head of household. In order for any other adult family member to participate in the program, the head of household must actively participate in FSS. Further, in order for an FSS family to successfully complete the program, the head of household is solely responsible for completing his/her Individual Training and Services Plan (ITSP) and must be employed by COP expiration.

SDHC is requesting MTW authority to provide the opportunity for FSS enrollment to more than 9,400 non-head of household adults when the head of household is unable to join the program. Non-head of households who enter into a COP will be responsible for the completion of the ITSP and must be employed by the end of participation in order for the FSS family to successfully complete the program.

If the proposed initiative is approved, the FSS Action Plan, which provides for the policies and procedures of the FSS Program, will be revised in order to address this change. The FSS Action Plan will specifically stipulate that there will be only one FSS escrow account per household. The FSS Action Plan will also allow the execution of a COP by a non-head of household only in instances where the head of household is not able to actively participate in the program. Appropriate reasons for a head of household not to participate in FSS will include cases where the head of household suffers from a disability or is primarily responsible to provide constant care to a family member with special needs or young children. Any HUD funding awarded to SDHC through a competitive grant process for FSS purposes will be used in accordance with NOFA requirements and parameters.

Currently, HAP funds deposited by SDHC into FSS escrow accounts are reimbursed to the agency by HUD. With this initiative, SDHC is requesting that this policy be extended to the escrow accounts opened by non-head of households who join FSS. If approved, this initiative will be revenue-neutral to SDHC. SDHC plans to increase its overall FSS program enrollment regardless of whether or not this initiative is approved. This initiative will simply provide a wider variety of rental assistance families the opportunity to participate in FSS.

**Relationship to Statutory Objectives:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self sufficient. Increase housing choices for low-income families.

**Anticipated Impact:** The anticipated impact of this initiative is increased recruitment and enrollment into the FSS Program, which will provide incentives to families to become economically self-sufficient. This initiative will allow families to enroll in FSS when they are ready, even when the head of household is unable to participate in the program. No undesirable effects are foreseen or expected as a consequence of this initiative.

**Baselines, Benchmarks, and Metrics:** Currently SDHC follows HUD guidelines and only executes COP agreements with adult head of households. Since it is a new initiative, the baseline is 460 families currently enrolled in FSS, all COPs executed by the head of household. SDHC, accounting for attrition through graduation and COP expiration, will increase its overall FSS enrollment to

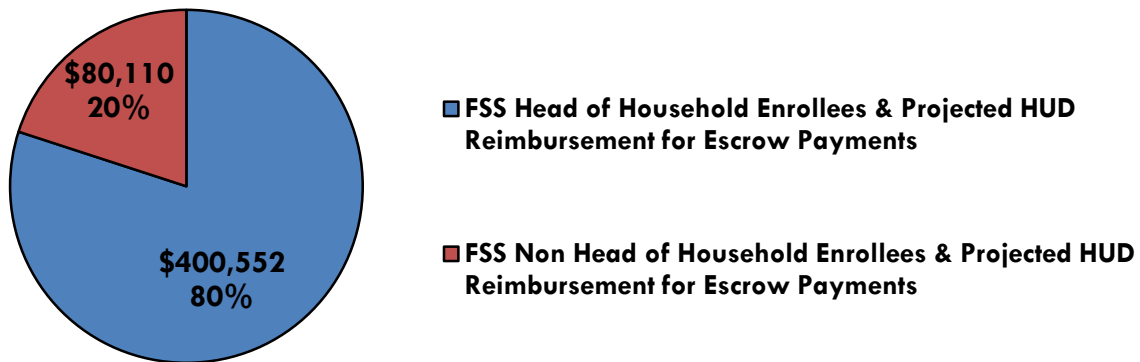


520 participants, with the goal of reaching 20% of total enrollment by non-head of households. The FSS Program is designed to assist participants with achieving career goals in the medium- to long-term, allowing enrollees up to five years to complete their ITSP. For this reason, the proposed initiative will follow a progression of initial steps leading to more significant outcomes in subsequent years.

**Baselines:**

- 460 families enrolled in the FSS program, all with COP executed with the head of household.
- 0 families enrolled in the FSS program with COP executed with adult non-head of household.
- 0 adult non-head of household invited to join FSS.
- 0 adult non-head of households attended a FSS orientation in Fiscal Year 2009.
- \$400,552 HAP dollars deposited into all FSS escrow accounts in Fiscal Year 2009.
- 0 adult non-head of households enrolled in a training or education program.
- 0 adult non-head of households obtained full-time employment.
- 0 adult non-head of households obtained part-time employment.
- 0 FSS Families with COP executed by adult non-head of household had earned income increase.

**Annual Projected Families Enrolled in Family Self-Sufficiency Program & Projected HUD Reimbursement for Escrow Payments**



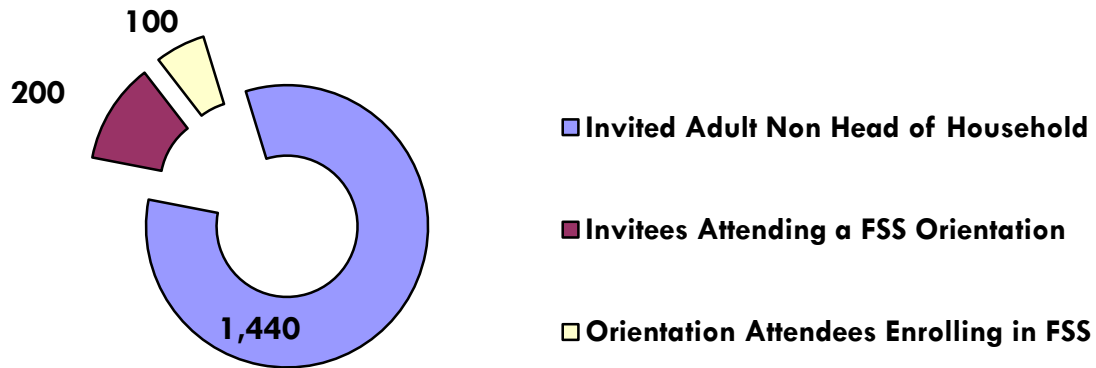
**Benchmarks:**

- Total of 1440 adult non-head of households invited to join FSS by June 30, 2011.
- Total of 200 adult non-head of households attended a FSS orientation by June 30, 2011.
- Total of 100 adult non-head of households enrolled in FSS by June 30, 2011.
- Percentage of adult non-head of households enrolled in FSS will be 20% by June 30, 2011.
- The total overall increase in FSS enrollment will be 60 by June 30, 2011.
- \$480,662 HAP dollars deposited into all FSS escrow accounts by June 30, 2011.
- Total of 10 adult non-head of households enrolled in a training or education program by June 30, 2011.
- Total of 10 adult non-head of households obtained full time employment by June 30, 2011.
- Total of 10 adult non-head of households obtained part time employment by June 30, 2011.



- Total of 10 FSS Families with COP executed by adult non-head of household had earned income increase by June 30, 2011.

**Projected Adult Non-Head of Households Enrolled in the Family Self-Sufficiency Program**



*Metrics:*

- Number of adult non-head of households invited to join FSS.
- Number of adult non-head of households who attended an FSS orientation.
- Number of adult non-head of households who enroll in FSS.
- Percentage of adult non-head of households enrolled in FSS.
- Number of overall increased enrollment in FSS.
- Total annual HAP dollars provided by HUD for escrow accounts.
- Number of adult non-head of households who enrolled in a training or education.
- Number of adult non-head of households who obtained full-time employment.
- Number of adult non-head of households who obtained part-time employment.
- Number of families with COP executed by adult non-head of household who had earned income increase.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** SDHC plans on using Efforts To Outcomes (ETO) Software, by Social Solutions. The ETO software is a web-based performance management solution that allows data to be accessed via generated reports to monitor, measure, and optimize program impact. ETO reports describing the above metrics will be developed and analyzed on a monthly basis. The reports will summarize the data on a quarter-to-date and year-to-date basis. Analyzing data on a frequent basis will assist SDHC in quantifying results and identifying opportunities for continuous improvement in the initiative.



Non-Head of Household Enrollment in FSS								
Metric	Baseline 2010	QTD (%)	QTD (#)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal ( Y or N)
Number of adults non-head of household invited to join FSS	0					1440	06/30/2011	
Number of adults non-head of household who attended an FSS orientation	0					200	06/30/2011	
Number of adults non-head of household who enroll in FSS	0					100	06/30/2011	
Percentage of adult non-head of households enrolled in FSS	0					20%	06/30/2011	
Number of overall increased enrollment in FSS	0					60	06/30/2011	
Total annual HAP dollars provided by HUD for escrow accounts	\$400,552					\$480,662	06/30/2011	
Number of adult non-head of households who enrolled in a training or education	0					10	06/30/2011	
Number of adult non-head of households who obtained full-time employment	0					10	06/30/2011	
Number of adult non-head of households who obtained part-time employment	0					10	06/30/2011	
Number of families with COP executed by adult non-head of household who had earned income increase	0					10	06/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment C, Section E containing waivers of Section 23 of the 1937 Act and 24 CFR 984.

**10. ALLOW BROADER USES OF FUNDS FOR THE CREATION OF INDIVIDUAL DEVELOPMENT ACCOUNTS**

SDHC operates asset building programs for youth and adult MTW HCV participants. Asset building programs encourage families to save money to buy homes, secure reliable transportation for job-related activities, or to build small business start-up capital. Individual Development Accounts (IDAs), a component of asset building programs, are savings accounts with matching funds drawn from private or public sources. SDHC's current IDAs provide a 3:1 match for participants with a maximum of \$3000 in matching funds.

*Adult IDAs*

Currently, IDA matching funds for adult participants come from a competitive grant offered through the U.S. Department of Health and Human Services (HHS). These funds come with restrictions that make participants earning more than twice the Federal poverty level ineligible for an IDA. Currently, over 500 MTW HCV families exceed these income limits. SDHC requests broader uses of funds authority to create ten IDAs for participants who do not qualify for HHS





funds due to income restrictions. These new IDAs will be limited to families who earn 80 percent AMI or below.

*Youth IDAs*

In May 2008, SDHC established a small asset building program, named *The Money Project* by participants, for 63 youth fourteen years of age and older. Because HHS funding restrictions do not allow IDAs for individuals younger than eighteen years of age, SDHC secured local funds for the youth program. Due to the economy, it has been difficult to secure additional funding to expand the youth program. More than 120 youth have attended the program orientation required to join the program. SDHC has been unable to enroll most of these youth due to lack of funding. SDHC requests broader uses of funds authority to create ten IDAs for participants fourteen years and older who are interested in enrolling in the asset building program.

*Transportation IDAs*

MTW flexibility allowed for the implementation of the Choice Communities initiative in Fiscal Year 2010. The Choice Communities Program provides families with tools to encourage them to move from high-poverty neighborhoods to low-poverty neighborhoods. One barrier to families wanting to move to a low-poverty area is adequate transportation. Often these low-poverty neighborhoods are far from participants' jobs and support networks, and public transportation is not always convenient. HHS funding does not allow for IDAs to be used toward transportation costs. SDHC requests broader uses of funds authority to create ten IDAs for participants living in the Choice Communities areas to save for a car purchase or car maintenance costs.

No additional HUD funding will be requested for this initiative, but rather MTW monies will be used. SDHC anticipates the cost of this initiative will be approximately \$90,000 over a three year period.

Number of Projected IDAs Resulting from MTW Broader Fund Flexibility			
IDA Type	Number of IDAs	IDA Match Commitment at \$3,000 Max (3:1).	
		Annual Match Commitment (Participant contribution)	3 Year Program Match Commitment (SDHC's MTW funds contribution)
Over Income IDAs	10	\$10,000	\$30,000
Youth IDAs	10	\$10,000	\$30,000
Transportation IDAs	10	\$10,000	\$30,000
<b>Total</b>	<b>30</b>	<b>\$30,000</b>	<b>\$90,000</b>

**Relationship to Statutory Objectives:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self sufficient. Increase housing choices for low-income families.

**Anticipated Impact:** This initiative will allow for the establishment of IDAs for MTW HCV participants who otherwise would not be able use this benefit due to funding limitations, thus providing incentives for families to become more self-sufficient.

Additionally, the transportation IDAs will increase housing choices for low-income families with transportation barriers who are interested in moving from high-poverty neighborhoods to low-poverty neighborhoods.



**Baselines, Benchmarks, and Metrics:** SDHC's asset building programs are designed to assist participants with achieving asset building goals in the medium to long term, allowing enrollees up to three years to complete their asset plan. For this reason, the proposed initiative will follow a progression of initial steps leading to more significant outcomes in subsequent years.

*Baselines:*

- 90 current participants who meet HHS eligibility enrolled in the adult asset building program.
- 63 youth enrolled in the youth asset building program funded by local funds.
- 0 adult participants earning more than HHS income limits enrolled in the asset building program with an IDA match account.
- 0 youth ages 14 and over enrolled in the youth asset building program with an IDA match account funded by MTW funds.
- 0 participants enrolled in the asset building program with a transportation IDA match account funded by MTW funds.
- 0 MTW IDA participants opened an IDA account.
- 0 MTW IDA participants developed a credit improvement plan.
- 0 MTW IDA participants made at least nine monthly deposits to their IDA during a twelve-month period.
- 0 MTW IDA participants completed ten hours of Financial Skills Education each.

*Benchmarks:*

- Total of 10 adult participants earning more than HHS income limits enrolled in asset building program taking advantage of maximum annual IDA match by June 30, 2011.
- Total of 10 youth ages 14 and over enrolled in youth asset building program taking advantage of maximum annual IDA match funded by MTW funds by June 30, 2011.
- Total of 10 participants enrolled in asset building program taking advantage of maximum annual Transportation IDA match funded by MTW funds by June 30, 2011.
- Total of 20 MTW IDA participants open an IDA account by June 30, 2011.
- Total of 15 MTW IDA participants develop a credit improvement plan by June 30, 2011.
- Total of 15 MTW IDA participants make at least nine monthly deposits to their IDA during a twelve-month period by June 30, 2011.
- Total of 15 MTW IDA participants complete ten hours of Financial Skills Education each by June 30, 2011.

*Metrics:*

- Annual number of adult participants enrolled in asset building program taking full advantage of maximum annual IDA match funded by MTW funds.
- Annual number of youth ages 14 and over enrolled in youth asset building program taking full advantage of maximum annual IDA match funded by MTW funds.
- Annual number of participants enrolled in asset building program taking full advantage of maximum annual transportation IDA match funded by MTW funds.
- Annual number of MTW IDA participants who opened an IDA account.
- Annual number of MTW IDA participants who developed a credit improvement plan.
- Annual number of MTW IDA participants who made at least nine monthly deposits to their IDA during a twelve-month period.



- Annual number of MTW IDA participants who completed ten hours of Financial Skills Education.

**Data Collection Process and Proposed Metrics to Measure Achievement of Statutory Objectives:** The Workforce & Economic Development Unit will use Efforts To Outcomes (ETO) Software to track tenant participation in Asset Building programs, and tenant IDA activity. The ETO software is a web-based performance management database that allows data to be accessed via generated reports to monitor, measure, and optimize program impact. ETO reports describing the above metrics will be developed and analyzed on a quarterly basis. Progress toward establishing and tracking IDAs for this initiative will be shared with the Choice Communities Program.

Creation of Additional IDAs								
Metric	Baseline 2009	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal ( Y or N)
Annual number of adult participants enrolled in asset building program with IDA funded by MTW funds	0					10	06/30/2011	
Annual number of youths enrolled in youth asset building program with IDA funded by MTW funds	0					10	06/30/2011	
Annual number of participants enrolled in asset building program with transportation IDA	0					10	06/30/2011	
Annual number of MTW IDA participants who opened a IDA account	0					20	06/30/2011	
Annual number of MTW IDA participants who developed a credit improvement plan	0					15	06/30/2011	
Annual number of MTW IDA participants who made at least nine monthly deposits to their IDA during a twelve-month period	0					15	06/30/2011	



Creation of Additional IDAs								
Metric	Baseline 2009	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal ( Y or N)
Annual number of MTW IDA participants who completed ten hours of Financial Skills Education	0					15	06/30/2011	

**Authorization(s) to Conduct the Activity:** MTW Agreement Attachment D, Broader Uses of Funds.



## SECTION VI – ONGOING MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

#	Initiative Description	Statutory Objective	Plan Year Approved	Status Update/Implementation Date	Attachment C Revisions	Outside Evaluators
1	Implement a revised inspection protocol	Reduce costs and achieve greater cost effectiveness	2010	Implemented June 1, 2010	N/A	No
2	Authorize the SDHC to inspect and determine rent reasonableness for SDHC owned properties	Reduce costs and achieve greater cost effectiveness	2010	Implemented July 13, 2009	N/A	No
3	Implement triennial income certifications for elderly and disabled clients	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	No
4	Choice Communities Components <ul style="list-style-type: none"> <li>▪ Eliminate 40% Affordability Cap</li> <li>▪ Moving for Opportunity Program</li> <li>▪ Revolving Security Deposit Loan fund</li> <li>▪ Increase payment standards in low-poverty areas</li> </ul>	Increase housing choices	2010	<ul style="list-style-type: none"> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented January 1, 2010</li> <li>▪ Implemented June 1, 2010</li> </ul>	N/A	No
5	Standardize utility allowances by unit size	Reduce costs and achieve greater cost effectiveness	2010	Implemented April 1, 2010	N/A	No
6	Simplify income and asset verification systems to reduce administrative costs	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	No
7	Adopt a local interim certification policy	Increase housing choices; encourage self-sufficiency	2010	To be implemented August 1, 2010	N/A	No
8	Establish an HCV homeownership program	Increase housing choices; encourage self-sufficiency	2010	Implemented October 1, 2009	N/A	No
9	Expand the PBV program	Increase housing choices	2010	Pending voucher availability	N/A	No
10	Undertake Public Housing development	Increase housing choices	2010	Acquired 39 additional public housing units in FY 2010	N/A	No
11	Economic Development Academy	Encourage self-sufficiency	2009	Opening October 1, 2010	N/A	No



## SECTION VII – SOURCES AND USES OF FUNDING

A. Below is a table detailing the sources and uses of funding:

FY11 MTW Revenues & Expenditures				
PLANNED SOURCES				
		Section 8	Public Housing	Total
Capital Fund 501-07	HUD grants	0	286,116	286,116
Capital Fund FY10 501-09 (UC Public Housing)	HUD grants	0	27,358	27,358
Capital Fund FY11 501-10 (UC Public Housing)	HUD grants	0	31,042	31,042
Capital Fund FY11 501-10 (Vista Verde Public Housing)	HUD grants	0	34,500	34,500
Capital Fund FY11 Replacement Housing Factor	HUD grants	0	2,005,429	2,005,429
Public Housing AMP 7	Rental income	0	146,848	146,848
Public Housing AMP 7	Non-dwelling income	0	71,336	71,336
Public Housing AMP 7	Operating subsidy	0	18,049	18,049
Public Housing AMP 7	Other revenue - ph reserves	0	6,594,468	6,594,468
Public Housing AMP 8	Rental Income	0	163,164	163,164
Public Housing AMP 8	Non-dwelling income	0	6,582	6,582
Public Housing AMP 8	Operating subsidy	0	20,054	20,054
Public Housing Other AMPS (1-6)	Operating subsidy - repositioning	0	5,438,243	5,438,243
Section 8 Voucher	Section 8 subsidy	173,102,187	0	173,102,187
<b>Total Sources</b>		<b>173,102,187</b>	<b>14,843,189</b>	<b>187,945,376</b>
PLANNED USES				
		Section 8	Public Housing	Total
Administration & Operations		10,906,125	210,183	11,116,308
Housing Assistance Payments		155,706,553	0	155,706,553
Housing Dev/Site Acquisition		1,500,000	12,272,476	13,772,476
MTW Choice Communities		35,000	0	35,000
MTW Economic Development Academy (Operations & Admin)		2,396,765	0	2,396,765
MTW Economic Development Academy (WED IDA Accounts)		30,000	0	30,000
MTW Foreclosure Initiatives		150,000	0	150,000
MTW Security Deposit Assistance Program		50,000	0	50,000
Property Mgmt & Routine Maintenance Expenses		0	141,496	141,496
Relocation		18,000	0	18,000
Site Improvement		0	85,374	85,374
Reserves		2,309,744	2,133,660	4,443,404
<b>Total Expenditures</b>		<b>173,102,187</b>	<b>14,843,189</b>	<b>187,945,376</b>

- B. SDHC will not use any State or local funds for the MTW program.
- C. No central office cost center has been established because SDHC owns and manages only 75 public housing units.
- D. SDHC is using a cost allocation approach that meets HUD’s requirements.

- E. SDHC will use single-fund flexibility in support of MTW activities rather than creating numerous budgets. SDHC combines funds from public housing operating and capital fund assistance (authorized by section 9 of the United States Housing Act of 1937 (the Act) and voucher funds (authorized by section 8(o) of the Act) to implement a block grant/single fund budget approach to budgeting and accounting. SDHC has consolidated public housing and housing choice voucher program funds to implement the approved Moving to Work initiatives described in this Plan and in future Plans.

Funds that originated as voucher funds may be used for all of these activities.

SDHC may use public housing and/or voucher funds to acquire additional public housing and affordable housing developments. These funds would be used for the capital to acquire, rehabilitate or produce housing units that will comply with public housing development requirements. The units then could receive operating subsidy as replacement housing.

The following ongoing and proposed activities are being funded, at least partially, with the single-fund budget:

- FY2009/2010: Economic Development Academy, Choice Communities, Housing Choice Voucher Homeownership Program (Foreclosure Incentives), Public Housing development/ acquisition.
- FY2011: Acquisition of Additional Affordable Units, Public Housing development/ acquisition, Sponsor-Based Vouchers for the Homeless Program, Enhancing Family Self-Sufficiency Program, and Broader Uses of Funds for IDAs.

None of the above programs would be possible without the flexibility to combine funds into a single budget, allowing SDHC to use funds in a non-traditional way in order to best meet local needs.

#### **UPDATE ON RHF AND ARRA FUNDS**

The use for the 2009 Replacement Housing Factor funds, which amount to \$2,005,429, have been combined with ARRA Capital Funds in the amount of \$2,173,051, along with prior year capital funds, to acquire 39 family housing units that the SDHC will operate as public housing (total estimated project budget of \$5,183,037). The development consists of seven two-bedroom apartments, 32 three-bedroom apartments and one two-bedroom manager's unit (not included in total). MTW block grant funds were not used to purchase these public housing units. Further, SDHC understands ARRA funds are not included in the MTW block grant fund.

### **SECTION VIII – ADMINISTRATIVE INFORMATION**

- A. Resolution signed by the Board of Commissioners: See Appendix A
- B. SDHC will use annual MTW Reports as its evaluation mechanism.
- C. Evidence of Community and Resident Participation: See Appendix B





## APPENDIX A

### SAN DIEGO HOUSING COMMISSION

RESOLUTION NO. 1454

ADOPTED ON MARCH 19, 2010

WHEREAS, on March 19, 2010 the San Diego Housing Commission Board of Commissioners approved the amendment to the Amended and Restated Moving to Work Agreement between the United States of America through the U.S. Department of Housing and Urban Development (HUD) and the San Diego Housing Commission to include Attachment D Community-Specific Authorizations: Use of MTW Funds.

WHEREAS, on March 19, 2010 the San Diego Housing Commission Board of Commissioners approved the submission of the proposed Annual Moving to Work Plan for July 1, 2010 through June 30, 2011 to HUD.

I HEREBY CERTIFY that the abovementioned is true and correct as passed and adopted by the San Diego Housing Commission, of the City of San Diego, California on March 19, 2010.

Vote:           Yeas – 6  
                  Nays – 0  
                  Abstention-1  
                  Absent – 0

By:   
Deputy Secretary



## **APPENDIX B**

### **Public Hearing Notice and Evidence of Community and Resident Participation**

The San Diego Housing Commission formally solicited public comment on the Fiscal Year 2011 Annual Plan Draft in order to incorporate the ideas of citizens into the proposed plan, the amendment to the MTW agreement, as well as answer questions pertaining to Moving to Work subject matter. A public hearing was held on February 17, 2010 at the SDHC corporate office for the purposes of educating the public and receiving comments. A public notice was circulated in four local publications (La Prensa San Diego, The Daily Transcript, The San Diego Union Tribune, The San Diego Voice and Viewpoint) to encourage public involvement. In an attempt to encourage further participation among San Diego residents and program clients, SDHC issued personal invitations to a selected group of individuals and partners. The majority of individuals receiving the personal invitations were current rental assistance recipients and therefore were positioned to provide practical suggestions and feedback. All methods of invitation provided residents of San Diego with multiple options for contacting appropriate personnel with comments if unable to attend the public hearing. Overall, SDHC received positive feedback concerning the proposed initiatives with an emphasis on the initiatives specifically designed to address homelessness and promote self-sufficiency.

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

- ✓ Proof of publication – La Prensa San Diego
- ✓ Proof of publication – The Daily Transcript
- ✓ Proof of publication – The San Diego Union Tribune
- ✓ Proof of publication – The San Diego Voice and Viewpoint
- ✓ Public Hearing Sign-in Sheet
- ✓ Public Comment Matrix

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

STATE OF CALIFORNIA,  
COUNTY OF SAN DIEGO,

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of La Prensa San Diego, a newspaper of general circulation, printed and published weekly in the City of San Diego County of San Diego, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of May 9, 1978, Case Number 4137435; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

February 5, 12

all in the year 2010,

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

Dated at San Diego

California, this 12th day of February, 2010.

  
Signature

This space is for the County Clerk's Filing Stamp

Proof of Publication of:

PUBLIC NOTICE

AMEND ITS RESTATED MOVING TO  
WORK (MTW) AGREEMENT

**PUBLIC NOTICE**

The San Diego Housing Commission (SDHC) announces its intent to amend its Restated Moving To Work (MTW) Agreement to include broader uses of funds and to solicit public comment on its proposed Fiscal Year 2011 MTW Annual Plan effective July 1, 2010. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. The Housing Commission is soliciting public comment on the program and policy changes being considered for Fiscal Year 2011 (July 1, 2010 through June 30, 2011). Examples of the program and policy changes being considered include: Utilizing broader uses of funds authority; creation of a voucher program for the homeless; ensuring affordable rent in project based units; encouraging employment of program participants through internal procedural changes. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning February 11, 2010. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 17, 2010 at 11:30 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to March 12, 2010 to the following address: SDHC/MTW, 1122 Broadway, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly, Project Coordinator at [jennifek@sdhc.org](mailto:jennifek@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125.

Published: 2/5, 12/2010  
La Prensa San Diego

# CERTIFICATE OF PUBLICATION

Michelle Bell  
San Diego Housing Commission  
1122 Broadway, Suite 300  
San Diego, CA 92101

IN THE MATTER OF

CASE NO.

## Restated Moving To Work (MTW)

San Diego Housing Commission  
Public Notice

The San Diego Housing Commission (SDHC) announces its intent to amend its Restated Moving To Work (MTW) Agreement to include broader uses of funds and to solicit public comment on its proposed Fiscal Year 2011 MTW Annual Plan effective July 1, 2010. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. The Housing Commission is soliciting public comment on the program and policy changes being considered for Fiscal Year 2011 (July 1, 2010 through June 30, 2011). Examples of the program and policy changes being considered include: Utilizing broader uses of funds authority; creation of a voucher program for the homeless; ensuring affordable rent in project based units; encouraging employment of program participants through internal procedural changes. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning February 11, 2010. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 17, 2010 at 11:30 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to March 12, 2010 to the following address: SDHC/MTW, 1122 Broadway, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to [jennifek@sdhc.org](mailto:jennifek@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125.  
Pub. Feb 5, 12-00069712

I, Cathy L. Krueger, am a citizen of the United States and a resident of the county aforesaid; am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of **The Daily Transcript**, a newspaper of general circulation, printed and published daily, except Saturdays and Sundays, in the City of San Diego, County of San Diego and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of January 23, 1909, Decree No. 14894; and the

### Public Notice

is a true and correct copy of which the annexed is a printed copy and was published in said newspaper on the following date(s), to wit:

**February 5, 12**

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

Dated at San Diego, California this February 5, 2010

  
(Signature)

P.O. Box 120191, San Diego, CA 92112-0191

### AFFIDAVIT OF PUBLICATION

SAN DIEGO HOUSING COMMISSION  
1122 BROADWAY #300  
ATTN: GABY NEVINS  
SAN DIEGO, CA 92101

STATE OF CALIFORNIA) ss.  
County of San Diego)

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

#### The San Diego Union-Tribune

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

Feb 5, 2010, Feb 12, 2010

  
Chief Clerk for the Publisher

2/24/10  
Date

Affidavit of Publication of

Legal Advertisement  
Ad # 0010346569  
ORDERED BY: MICHELLE BELL

### Public Notice

The San Diego Housing Commission (SDHC) announces its intent to amend its Restated Moving To Work (MTW) Agreement to include broader uses of funds and to solicit public comment on its proposed Fiscal Year 2011 MTW Annual Plan effective July 1, 2010. The MTW program is a Department of Housing and Urban Development (HUD) program allowing high performing housing authorities to make program and policy changes to (1) increase the housing choices of low-income families, (2) help residents achieve self-sufficiency, and (3) increase the cost effectiveness of federal housing programs. As an MTW participant, SDHC is required to develop an MTW Annual Plan outlining and identifying policies the housing authority plans to change and programs possibly implemented during the coming year. The Housing Commission is soliciting public comment on the program and policy changes being considered for Fiscal Year 2011 (July 1, 2010 through June 30, 2011). Examples of the program and policy changes being considered include: Utilizing broader uses of funds authority; creation of a voucher program for the homeless; ensuring affordable rent in project based units; encouraging employment of program participants through internal procedural changes. Interested persons are invited to view the proposal on the SDHC website ([www.sdhc.org](http://www.sdhc.org)) beginning February 11, 2010. SDHC will hold a Public Hearing to receive and review comments regarding the draft MTW proposal on Wednesday, February 17, 2010 at 11:30 a.m. at the SDHC office located at 1122 Broadway, Fourth Floor Conference Room. Written comments regarding the MTW policy/program proposals can be submitted by mail prior to March 12, 2010 to the following address: SDHC/MTW, 1122 Broadway, San Diego, California, 92101 Attn: Jennifer Kelly. Comments may also be emailed to Jennifer Kelly, Project Coordinator at [jennifek@sdhc.org](mailto:jennifek@sdhc.org). MTW Contact: Jennifer Kelly at 619-578-7125.



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**Moving Forward FY 2011 Plan and Agreement Amendment  
Public Hearing February 17, 2010 11:30 am**

Print Name	Signature	Organization
BARRY POLLARD	Barry Pollard	Citizens Dist. 4
Nellie Ruiz	Nellie Ruiz	Citizen
Natalie Riddle	<del>Alison Turner #27</del>	SDHC
Robert Shedaker	Mr. Robert Shedaker	SDHC. Citizen
Michelle Lau	Michelle Lau	Citizen
Jeff Davis	Jeff Davis	SDHC
JASON BROOKS	Jason Brooks	SDSU
Jennifer Kelly	Jennifer Kelly	SDHC
Jessica Adamo	Jessica Adamo	SDHC
Michelle Bell	Michelle Bell	SDHC



<b>Group/Agency</b>	<b>Questions/Comments Received</b>	<b>SDHC Responses</b>
Citizen	With the block grant funding, how much Moving Forward funding will be set aside for public housing?	SDHC anticipates using \$1.5 million in block grant funds to supplement Replacement Housing Factor and American Reinvestment and Recovery Act funds which will be used to purchase additional public housing units in Fiscal Year 2011.
Citizen	Does the Housing Commission still use the term public housing?	Yes. SDHC is in the process of increasing its public housing inventory.
Section 8 Tenant	Does the Veteran have to go through Veterans Administration for the VASH program?	Yes. The VASH program targets homeless veterans and their families. All referrals to the VASH program are made through the Veterans Administration.
Section 8 Tenant	Does the veteran have to go to the Mission Valley office?	The La Jolla office is the primary contact point for veterans interested in the VASH program, but any Veterans Administration office should be able to direct interested persons to the appropriate personnel.
Section 8 Tenant	I've been in the Section 8 program myself for a number of years, and I think it's a great program.	Thank you. SDHC agrees the program is great.
Citizen	What will prevent HUD from giving out too much funding?	All funding amounts are obligated under annual contracts between HUD and the Public Housing Authority. HUD determines funding based on the units authorized under the contracts to each PHA.
Citizen	What is project-based?	Unlike tenant-based assistance where the voucher holder can move to different units and retain assistance, project-based assistance is tied to a specific unit. If the tenant receiving project-based assistance decides to move, the assistance remains with the unit.
Section 8 Tenant	Is project-based like mod-rehab?	The assistance is comparable.
Citizen	I live in District 4, and there are a lot of unassisted units that are in bad condition. With the PVB units, are the conditions of the units tied to their eligibility for the participants? Are they monitored? On a scale of one to ten how are they monitored? Are there lists of units for public record?	All project-based units are subject to annual Housing Quality Standards inspections. The rental contracts for these units will reflect the HQS requirements to ensure both landlords and tenants comply. HUD requires all assisted units meet these standards in order to ensure participants reside in decent, sanitary housing conditions. Concerning the list of project-based units: The Vice President of the Rental Assistance Department is in attendance and states he will provide a list if the information is indeed public record. (The address of the inquiring citizen was solicited in the event SDHC is authorized to make the information public.)

Group/Agency	Questions/Comments Received	SDHC Responses
Section 8 Tenant	Can the San Diego Housing Commission shorten the time they take for the rent adjustment to be made when income decreases?	SDHC is currently following current internal procedures concerning the timeline staff members have to process interim requests, but thank you for the suggestion. SDHC will consider the suggestion.
Section 8 Tenant	I know some individuals that have benefitted from the FSS program. One of my neighbors went to school and became a court reporter, and two guys that lived there before were in the program and one became a doctor, the other became an engineer. They are very successful.	Thank you for sharing the information. Everyone here is grateful to hear stories of success. This is the reason we are all here.
Citizen	Can you tell me about the FSS program or send me information?	Please submit your address after the public hearing so the appropriate FSS staff member can forward the information. Information was sent to this citizen on February 18, 2010.
Section 8 Tenant	Email received in response to public hearing: I think that the landlord who accepts Section 8 should be held accountable and that the participant who reports things that are not in compliance with the program should be able to move. Yes, the rent subsidiary should match what the rent is right now. Sometimes, it takes a while to find a place that take Section 8 or any other voucher program and it is getting harder to find landlords to take it. On the other hand, the landlord that will take are willing to work with the program and should be recognize for that. FYI, I have a wonderful landlord and he make sure that my place is compliance and he performs above that. I am happy that you are going to help the homeless. They are some homeless that work and could benefit from the program. Thank you for taking the time to read this e-mail.	Email sent in response thanking him for his comments and feedback.
Section 8 Tenant	Received a phone call from a Section 8 participant on February 23, 2010, regarding the new MTW plan. She was an original participant in SHDC's MTW demonstration program in 1998. She would like to see SDHC more actively solicit participant involvement and listen to their feedback. She would like to see the EDA offer an English grammar/writing skills class. She thinks a participant survey soliciting ideas for new programs and changes is a good start.	Her comments were heard and different feedback mechanisms were discussed; she liked the idea of a participant survey. She was told that with this new MTW demonstration one goal is to incorporate more client participation and feedback in the design of future initiatives.