

# REPORT

#### DATE ISSUED: March 24, 2022

#### **REPORT NO: HAR22-012**

- **ATTENTION:** Chair and Members of the Housing Authority of the City of San Diego For the Agenda of April 19, 2022
- SUBJECT: Authorization for the San Diego Housing Commission (Housing Commission) to Accept and Expend Additional Federal Emergency Rental Assistance (ERA1) Funds Allocated by the U.S. Department of the Treasury to the City of San Diego to Support the COVID-19 Housing Stability Assistance Program (HSAP); Authorization for the Housing Commission to Accept and Expend State of California Rental Assistance (SRA) Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds Pursuant to State Senate Bill 115 to Support HSAP; and Approval of Related Actions

#### **COUNCIL DISTRICT:** Citywide

#### **REQUESTED ACTION**

Authorize the San Diego Housing Commission (Housing Commission) to accept and expend \$7,133,772.56 in federal Emergency Rental Assistance (ERA1) funds, which the U.S. Department of the Treasury has allocated directly to the City of San Diego, to support the COVID-19 Housing Stability Assistance Program (HSAP); authorize the Housing Commission to accept and expend up to \$96,291,294.59 in State of California Rental Assistance (SRA) Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds pursuant to State Senate Bill 115 to support HSAP; and approve related actions in this report.

#### **STAFF RECOMMENDATION**

That the Housing Authority of the City of San Diego (Housing Authority) take the following actions:

- Authorize the San Diego Housing Commission (Housing Commission) to amend its Fiscal Year 2022 budget in the amount of \$7,133,772.56 in federal Emergency Rental Assistance Program (ERA1) funds, which the U.S. Department of the Treasury allocated directly to the City of San Diego, to be administered by the Housing Commission to provide rental assistance and/or utility assistance to households with low income in the City of San Diego that experience financial hardship due to or during the COVID-19 pandemic and to cover administrative expenses in accordance with federal and state funding requirements.
- 2) Authorize the Housing Commission to accept and expend up to \$96,291,294.59 in State of California Rental Assistance (SRA) Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds pursuant to State Senate Bill 115 to support the City of San Diego COVID-19 Housing Stability Assistance Program, to be administered by the Housing Commission to provide rental assistance and/or utility assistance to households with low income in the City of San Diego that experience financial hardship due to or during the COVID-19 pandemic and to cover administrative expenses in accordance with state funding requirements.

- 3) Authorize the Housing Commission to amend its Fiscal Year 2022 budget in the amount up to \$96,291,294.59 in SRA Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds pursuant to State Senate Bill 115 to support the City of San Diego COVID-19 Housing Stability Assistance Program. If necessary, the continuing disbursement of approved funds would be included in the Housing Commission's Fiscal Year 2023 budget, which will be presented separately to the Housing Authority for consideration in June 2022.
- 4) Authorize the Housing Commission's Interim President & CEO, or designee, to modify the COVID-19 Housing Stability Assistance Program, if necessary, but only if and to the extent that such changes comply with the terms of the executed amended Memorandum of Understanding (MOU) between the Housing Commission and the City of San Diego for the oversight and administration of the COVID-19 Housing Stability Assistance Program and are necessary to fulfill federal and state funding requirements. Housing Commission staff will notify the Housing Authority and the City Attorney's Office about any subsequent amendments or modifications to the COVID-19 Housing Stability Assistance Program and other required documents, including amendments to any documents.
- 5) Authorize the Housing Commission's Interim President & CEO, or designee, to substitute approved funding sources with any other available funds as deemed appropriate, contingent upon budget availability, and further authorize the Interim President & CEO, or designee, to take such actions as are necessary, convenient and/or appropriate to implement this approval and delegation of authority by the Housing Commission upon advice of the General Counsel.
- 6) Authorize the Housing Commission's Interim President & CEO, or designee, to execute all necessary documents and instruments that are necessary and/or appropriate to implement these approvals, in a form and format approved by General Counsel, and to take such actions necessary and/or appropriate to implement these approvals, provided that a copy of the documents, signed as to form by General Counsel, are submitted to each Housing Commissioner in advance of approval for the designee to sign.

## **SUMMARY**

The Housing Commission administers and operates the City of San Diego COVID-19 Housing Stability Assistance Program (HSAP), which helps pay rent and utilities for households with low income in the City of San Diego that experience financial hardship due to or during the ongoing COVID-19 pandemic. The City Council (Agenda Item No. 603; Resolution No. 313439) and Housing Authority (Report No. HAR21-010; Resolution No. HA-1900) authorized HSAP and initial funding for the program on February 22, 2021. These approvals included budgeting \$83,705,260.75 for assistance payments to qualifying households.

The Housing Commission launched the online application portal for HSAP on March 15, 2021. As of March 21, 2022, at 10 a.m., 45,105 applications have been submitted, including 13,511 individuals who updated previously submitted information and/or requested additional assistance, and 38,571 additional applications have been started and are pending completion. The application remains open at <u>covidassistance.sdhc.org</u>, and additional applications are submitted daily.

The Housing Commission began disbursing payments in late April 2021 to help qualifying households. As of March 21, 2022, the Housing Commission has disbursed \$187,803,799.36 to help 16,441

qualifying households. Additional payments are disbursed each business day in accordance with the Housing Commission's posted operating hours.

In March 2021, the U.S. Congress enacted the American Rescue Plan Act (ARPA), which President Joe Biden signed into law on March 11, 2021. The City of San Diego received an allocation of \$54,539,063.20 in ARPA funds directly from the U.S. Department of the Treasury. These funds supported the operation of HSAP to help households that need help paying their rent and utilities to avoid being displaced from their homes. In addition, on June 23, 2021, the State of California transferred an additional \$5,610,840.67 in funding for which the Housing Commission requested Housing Authority and City Council approval on July 27, 2021, to expend on HSAP assistance payments and administrative expenses in accordance with State funding requirements. The \$60,149,903.87 was approved by the City Council (Agenda Item No. 331, Resolution No. R-313667) and Housing Authority (Report No. HAR21-015; Resolution No. HA-1921) for HSAP, of which \$51,484,860.16 was budgeted for assistance payments. The July 27, 2021, Housing Authority and City Council actions also approved a first amendment to the MOU between the Housing Commission and the City for the Housing Commission to continue to oversee and administer HSAP with the additional funds.

In addition, the State of California allocated \$39,712,779.17 of federal ARPA funds to the City of San Diego for HSAP assistance payments and program administration. On October 5, 2021, the City Council (Agenda Item No. 331; Resolution No. R-313732) and Housing Authority (Report No. HAR21-020; Resolution No. HA-1923) authorized the acceptance of these funds from the State and the expenditure of these funds on HSAP assistance payments and administrative expenses in accordance with federal and State funding requirements. The City Council and Housing Authority also approved a second amendment to the MOU between the City and the Housing Commission for the administration and oversight of HSAP to incorporate the \$39,712,779.17 of federal ARPA funds the State allocated to the City of San Diego and reflect the reallocation of CARES Act Community Development Block Grant (CDBG-CV) funds for use on a new eviction prevention and education program, which the Housing Commission would oversee through a separate agreement with the City of San Diego. In addition, the approved MOU amendment included updated program guidelines to allow HSAP to provide relocation assistance to eligible households that have been displaced during the pandemic, as permitted by U.S. Treasury Department guidelines that were revised on August 25, 2021.

At the Housing Commission's request, the State also allocated an additional \$27,000,000 to the City of San Diego for HSAP. On December 6, 2021, the City Council (Agenda Item No. 202; Resolution No. R-313800) and the Housing Authority (Report No. HAR21-027; Resolution No. HA-1931) authorized the use of these funds for the HSAP and a third amendment to the MOU between the Housing Commission and the City of San Diego for the administration and oversight of the program to incorporate these funds.

The Housing Commission continued to work with the office of Mayor Todd Gloria on efforts to obtain additional funding to continue to provide assistance to families with low income experiencing financial hardship due to or during the COVID-19 pandemic. The U.S. Department of the Treasury developed a process for the reallocation of federal emergency rental assistance funds. This potential reallocation included making additional funds available to high-performing agencies based on demonstrated need. On October 29, 2021, the Housing Commission submitted a formal request to the U.S. Department of the Treasury for \$115 million in reallocated funds to support HSAP. The Treasury Department on January 7, 2022, announced the reallocation of funds, including the \$8,308,615 allocated directly to the

City of San Diego in response to the Housing Commission's request. On March 1, 2022, the City Council (Resolution No. 313945) and the Housing Authority (Resolution No. HA-1937) authorized the use of the \$8,308,615 in reallocated federal funds to support HSAP.

All of the funding the City Council and Housing Authority have authorized for HSAP has been fully obligated to assist households with low income, including applicants who have preliminary approval, subject to review and confirmation of their documentation. The total obligations for assistance payments still exceed the available funding to help qualifying households.

The U.S. Department of the Treasury also published a notice allowing jurisdictions to reapply for an additional reallocation of funds. On January 18, 2022, the Housing Commission submitted a formal request for \$96,291,294.59 in additional funding based on an analysis of the program's projected need through May 2022. On March 14, 2022, the U.S. Department of the Treasury informed the City of San Diego that it awarded \$7,133,772.56 in reallocated funds to the City of San Diego.

On February 7, 2022, California State lawmakers passed Senate Bill (SB) 115, which California Governor Gavin Newsom signed into law February 9, 2022. This legislation authorized eligible local jurisdictions and federally recognized tribal governments to request cash flow loans from the California Department of Housing and Community Development (HCD) for Emergency Rental Assistance Program expenditures. Such expenditures must be for complete, eligible applications by households that were received on or before March 31, 2022 for rent and utilities due on or before March 2022, including administrative costs that are consistent with the provisions of Chapter 17 (commencing with Section 50897) of Division 31 of Part 2 of the Health and Safety Code, as applicable. SB 115 was intended to provide local programs with immediate cash, in the form of temporary cash flow loans, to maximize rental relief to all eligible households as the local programs await additional federal funding from either ERA1 or ERA2. If the anticipated federal funding is not received by June 30, 2023, is insufficient to repay the loan and/or if such funds cannot be utilized for reimbursements, the California Department of Finance will forgive an amount up to the amount not covered by the federal allocation.

As authorized by SB 115, HCD will make such cash flow loans available pursuant to terms and conditions developed by HCD. Such terms and conditions may include, but are not limited to, reporting; a repayment schedule; interest charged, if applicable, at the rate earned by moneys in the Pooled Money Investment Account; and remittance mechanisms that include the withholding of future state and federal funding administered by HCD.

The City of San Diego participates in the SRA program under "Option B," as that term is defined in subdivision (i) of Section 50897 of the Health and Safety Code, consistent with the State's implementation of Chapter 17 (commencing with Section 50897) of Division 31 of Part 2 of the Health and Safety Code.

The Housing Commission acknowledges that SRA Loan Award funds administered in HSAP is subject to and shall be administered in accordance with the State's requirements for Round 2 of the SRA Program, including, without limitation, the applicable requirements of Assembly Bill (AB) 832; SB 115; HCD's SRA Program Guidelines, dated September 27, 2021; and all such requirements as may be subsequently amended.

If the actions proposed in this report are approved, the Housing Commission will continue to administer HSAP pursuant to the amended MOU between the Housing Commission and the City of San Diego and federal and state regulations. The Housing Authority's actions on December 6, 2021, allow additional

related funds to be added to HSAP "without further amendment to the MOU upon appropriation by the City of San Diego and budget approval by the Housing Authority of the City of San Diego (Housing Authority) for amounts in excess of \$500,000" (Resolution No. HA-1931).

## AFFORDABLE HOUSING IMPACT

With the authorization to expend \$7,133,772.56 in reallocated federal ERA1 funds and up to \$96,291,294.59 in SRA Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds pursuant to State Senate Bill 115, HSAP will continue to help prevent housing displacement among low-income households. This program will help pay rent and utilities for additional eligible households that experience financial hardship due to or during the ongoing COVID-19 pandemic.

# EQUAL OPPORTUNITY/CONTRACTING/EQUITY ASSURANCE

The Housing Commission will continue to ensure HSAP is implemented equitably and in accordance with the Nondiscrimination section of the HSAP Implementation Plan.

## FISCAL CONSIDERATIONS

The funding proposed by this action was not included in the Housing Commission's Housing Authorityapproved Fiscal Year 2022 Budget. Approving this action will authorize the Housing Commission to accept and expend \$7,133,772.56 in reallocated federal ERA1 funds and up to \$96,291,294.59 in SRA Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds pursuant to State Senate Bill 115 to oversee and administer HSAP. If necessary, the continuing disbursement of approved funds would be included in the Housing Commission's Fiscal Year 2023 budget, which will be presented separately to the Housing Authority for consideration in June 2022.

## **Funding Sources**

Reallocated Federal ERA1 Funds:	\$7,133,772.56
SRA Program Emergency Rental Assistance Short-Term Cash Flow	
Loan Funds pursuant to State Senate Bill 115:	\$96,291,294.59
Total:	\$103,425,067.15

## **Funding Uses**

COVID-19 Housing Stability Assistance Program Assistance Payments:\$88,267,995.71COVID-19 Housing Stability Assistance Program Administration:\$15,157,071.44Total:\$103,425,067.15

# PREVIOUS COUNCIL AND/OR COMMITTEE ACTION

On October 13, 2020, the San Diego City Council unanimously approved the allocation of \$5,000,000 in Coronavirus Aid, Relief, and Economic Security (CARES) Act Community Development Block Grant (CDBG-CV) funds to support the City of San Diego COVID-19 Emergency Rental Assistance Program (Resolution No. R-313256).

On December 8, 2020, due to technical difficulties, the San Diego City Council and the Housing Authority continued to December 15, 2020, a report requesting authorization to execute an amended MOU between the Housing Commission and the City of San Diego to continue the oversight and administration of the City's COVID-19 Emergency Rental Assistance Program and to take related actions.

On December 15, 2020, the San Diego City Council and the Housing Authority returned to staff a report requesting authorization to execute an amended MOU between the Housing Commission and the City of San Diego (City) to continue the oversight and administration of the City's COVID-19 Emergency Rental Assistance Program and to take related actions.

On February 22, 2021, the San Diego City Council (Agenda Item No. 603; Resolution No. 313439) and Housing Authority (Report No. HAR21-010; Resolution No. HA-1900) authorized the City of San Diego to transfer \$92,211,316.57, which consists of \$42,333,563 in Coronavirus Relief Funds allocated directly to the City, \$44,877,753.57 in federal funds allocated by the State of California to the City, and \$5,000,000 of CDBG-CV funds from the City to the Housing Commission; and authorized the Housing Commission to accept and expend those funds to administer the COVID-19 Housing Stability Assistance Program to provide emergency rental assistance and/or utility assistance to households with low income experiencing financial hardship due to the ongoing COVID-19 pandemic.

On July 27, 2021, the City Council (Agenda Item No. 331, Resolution No. R-313667) and the Housing Authority (Report No. HAR21-015; Resolution No. HA-1921) authorized up to \$60,149,903.87 in additional funds for HSAP, consisting of the direct allocation of ARPA funds (\$54,539,063.20) and the aforementioned additional \$5,610,840.67 from the State.

On October 5, 2021, the City Council (Agenda Item No. 331; Resolution No. R-313732) and Housing Authority (Report No. HAR21-020; Resolution No. HA-1923) authorized up to \$39,712,779.17 in additional funds for HSAP, consisting of federal ARPA funds allocated by the State to the City.

On December 6, 2021, the City Council (Agenda Item No. 202; Resolution No. R-313800) and the Housing Authority (Report No. HAR21-027; Resolution No. HA-1931) authorized the use of an additional \$27,000,000 in funds the State allocated to the City of San Diego for HSAP and a third amendment to the MOU between the Housing Commission and the City of San Diego for the administration and oversight of the program to incorporate these funds.

On March 1, 2022, the City Council (Resolution No. 313945) and the Housing Authority (Resolution No. HA-1937) authorized the use of \$8,308,615 in federal funds reallocated to the City of San Diego from other jurisdictions to support HSAP.

# **KEY STAKEHOLDERS and PROJECTED IMPACTS**

Stakeholders for this project include households with low income in the City of San Diego experiencing financial hardship due to or during the COVID-19 pandemic, landlords and property owners for these households, and the Housing Commission. This action is expected to have a positive impact on the community by helping qualifying households pay past-due rent and utilities to assist with preventing housing displacement.

# ENVIRONMENTAL REVIEW

This activity is not a project as defined by the California Environmental Quality Act (CEQA) Section 21065 and CEQA Guidelines Section 15378(b)(4) and (5), as it involves government fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant impact on the environment, and it is also an organizational or administrative activity of government that will not result in direct or indirect physical changes to the environment. Thus, the activity is not subject to CEQA pursuant to CEQA Guidelines Section 15060(c)(3).

Federal funds constitute a portion of the funding for the project. NEPA approval was obtained from the City of San Diego on March 23, 2022.

## PREVIOUS SAN DIEGO HOUSING COMMISSION BOARD ACTION

On April 1, 2022, the San Diego Housing Commission Board of Commissioners voted 6-0 to recommend that the Housing Authority of the City of San Diego take the staff-recommended actions in this report.

Respectfully submitted,

Axucena Valladolid

Azucena Valladolid Executive Vice President Rental Assistance & Workforce Development San Diego Housing Commission

Approved by,

f Davis

Jeff Davis Deputy Chief Executive Officer San Diego Housing Commission

Docket materials are available in the "Governance & Legislative Affairs" section of the San Diego Housing Commission website at <u>www.sdhc.org</u>.

#### HOUSING AUTHORITY OF

#### THE CITY OF SAN DIEGO

RESOLUTION NUMBER HA-\_\_\_\_\_

DATE OF FINAL PASSAGE \_\_\_\_\_

A RESOLUTION OF THE HOUSING AUTHORITY OF THE CITY OF SAN DIEGO AUTHORIZING THE SAN DIEGO HOUSING COMMISSION TO ACCEPT AND EXPEND FEDERAL EMERGENCY RENTAL ASSISTANCE (ERA1) FUNDS IN THE AMOUNT OF \$7,133,772.56 AND STATE OF CALIFORNIA RENTAL ASSISTANCE (SRA) PROGRAM EMERGENCY RENTAL ASSISTANCE (SRA) PROGRAM EMERGENCY RENTAL ASSISTANCE SHORT-TERM CASH FLOW LOAN FUNDS IN THE AMOUNT OF \$96,291,294.59 TO SUPPORT THE COVID-19 HOUSING STABILITY ASSISTANCE PROGRAM AND RELATED ACTIONS.

WHEREAS, on February 22, 2021, in response to the COVID-19 pandemic, the Council

of the City of San Diego (Council) pursuant to San Diego Resolution R-313439 (Feb. 25, 2021),

and the Housing Authority of the City of San Diego (Housing Authority) pursuant to Housing

Authority Resolution HA-1900 (Feb. 22, 2021), authorized the City of San Diego's COVID-19

Housing Stability Assistance Program (HSAP), which provides rental assistance, utility

assistance, or both, to low-income households experiencing financial hardship due to the ongoing

COVID-19 pandemic; and

WHEREAS, in February 2021, the City allocated \$92,211,316.57 in initial funding for

HSAP from federal and state COVID-19 relief; and

WHEREAS, on March 12, 2021, the City of San Diego (City) and the San Diego

Housing Commission (Housing Commission) entered into a Memorandum of Understanding

(MOU) for the Housing Commission to administer HSAP pursuant to the Council's and Housing

Authority's direction and in compliance with federal and state law; and

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(HA-2022-20)

WHEREAS, since February 2021, the Council and Housing Authority have allocated approximately \$135 million to HSAP from federal and state sources through Resolutions R-313667 (Aug. 3, 2021) and HA-1921 (July 27, 2021), R-313732 (Oct. 12, 2021) and HA-1923 (Oct. 5, 2021), R-313800 (Dec. 7, 2021) and HA-1931 (Dec. 6, 2021), and in each instance the City and Housing Commission amended the MOU; and

WHEREAS, on December 7, 2021, the Third Amendment to the MOU entered by the City and Housing Commission allows additional related funds to be added to HSAP without further amendment to the MOU upon appropriation by the City and budget approval by the Housing Authority for amounts in excess of \$500,000.00; and

WHEREAS, on March 1, 2022, the Council and Housing Authority allocated \$8,308,615.00 in federal funds to support HSAP through Resolution R-313945 (March 7, 2022) and HA-1937 (March 1, 2022); and

WHEREAS, on March 15, 2021, the Housing Commission launched the online application portal for HSAP and as of March 21, 2022, 45,105 applications have been submitted, which includes 13,511 individuals who updated previously submitted information or requested additional assistance, and 38,571 additional applications that have been started and are pending completion, and additional applications are submitted daily; and

WHEREAS, as of March 21, 2022, the Housing Commission has disbursed \$187,803,799.36 to assist 16,441 qualifying households; and

WHEREAS, all of the funding allocated to date for HSAP has been fully obligated to assist low-income households, and the total obligations for assistance payments still exceed the available funding needed to help qualifying households; and WHEREAS, the United States Department of the Treasury made additional funds available to high-performing agencies based on demonstrated need and on January 18, 2022, the Housing Commission submitted a formal request for \$96,291,294.59 to support HSAP; and

WHEREAS, on March 14, 2022, the United States Department of the Treasury awarded the City \$7,133,772.56 in reallocated funds to support HSAP; and

WHEREAS, on February 9, 2022, State Senate Bill 115 (SB 115) was enacted, authorizing the City to apply for State of California Rental Assistance (SRA) Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds (SRA Loan Funds) for expenditures for rent and utilities due on or before March 31, 2022 and administrative costs associated with complete, eligible HSAP applications received by the Housing Commission on or before March 31, 2022; and

WHEREAS, the intent of SB 115 is to provide HSAP with temporary cash flow loans to maximize rental relief to all eligible households as HSAP awaits additional federal funding from the United States Department of the Treasury's reallocated federal funds; and

WHEREAS, SB 115 provides that the California Department of Finance will forgive SRA Loan Funds allocated to HSAP up to an amount not covered by federal fund reallocations, if anticipated federal fund reallocations are not received by June 30, 2023, is insufficient to repay the loan, or if the federal funds cannot be utilized for reimbursements; and

WHEREAS, Housing Commission staff determined this activity is not a project as defined by the California Environmental Quality Act (CEQA) section 21065 and CEQA Guidelines section 15378(b)(5); and

WHEREAS, City staff determined this activity is categorically excluded from the National Environmental Policy Act (NEPA) as not subject to Title 24 of the Code of Federal

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(HA-2022-20)

Regulations section 58.5 under Title 24 of the Code of Federal Regulations section 58.35(b) regarding supportive services; and

WHEREAS, San Diego Municipal Code section 98.0301(d)(9)(A) requires Housing Authority approval of amendments to the Housing Commission's budget; NOW, THEREFORE,

BE IT RESOLVED, by the Housing Authority of the City of San Diego, as follows:

1. The Housing Commission is authorized to amend the Housing Commission Fiscal Year 2022 budget, accept, and expend additional federal Emergency Rental Assistance Program funds allocated by the U.S. Department of the Treasury to the City of San Diego in the amount of \$7,133,772.56 to support HSAP.

The Housing Commission is authorized to accept and expend up to
\$96,291,294.59 in SRA Program Emergency Rental Assistance Short-Term Cash Flow Loan
Funds pursuant to SB 115 to support HSAP, to be administered by the Housing Commission for
HSAP.

 The Housing Commission is authorized to amend the Housing Commission Fiscal Year 2022 budget in the amount of \$96,291,294.59 in SRA Program Emergency Rental Assistance Short-Term Cash Flow Loan Funds to support HSAP.

4. The Housing Commission Interim President and Chief Executive Officer (Interim President and CEO), or designee, is authorized to modify HSAP, if necessary, but only if and to the extent that such changes comply with the terms of the executed amended MOU, are necessary to fulfill funding requirements, and comply with federal and state funding requirements.

5. The Interim President and CEO, or designee, is authorized to substitute approved funding sources with any other available funds as deemed appropriate, contingent upon budget

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availability, without further action by the Housing Commission Board or the Housing Authority, but only if and to the extent funds are determined to be available for such purposes and upon the advice of Housing Commission General Counsel.

6. The Interim President and CEO, or designee, is authorized to execute any documents and instruments that are necessary and appropriate to implement this Resolution, in a form and format approved by Housing Commission General Counsel, and to take such actions necessary and appropriate to implement these approvals without further action of the Housing Commission Board or the Housing Authority, provided that a copy of the documents, signed as to form by General Counsel, are submitted to each Housing Commissioner in advance of approval for the designee to sign.

7. The Housing Commission staff will notify the Housing Authority and the San Diego City Attorney's Office about any subsequent amendments or modifications to HSAP and other required documents, including amendments to any documents.

APPROVED: MARA W. ELLIOTT, General Counsel

By

Justin R. Bargar Deputy General Counsel

JRB:cw 04/04/22 Or. Dept: SDHC Doc. No. 2934175



The City of San Diego Item Approvals

**Item Subject:** Authorization for the San Diego Housing Commission (Housing Commission) to Accept and Expend Additional Federal Emergency Rental Assistance (ERA1) Funds Allocated by the U.S. Department of the Treasury to the City of San Diego to Support the COVID-19 Housing Stability Assistance Program (HSAP)

Contributing Department	Approval Date
ENVIRONMENTAL ANALYSIS	03/25/2022
DOCKET OFFICE	03/25/2022

Approving Authority	Approver	Approval Date
HOUSING COMMISSION FINAL DEPARTMENT APPROVER	MARSHALL, SCOTT	03/23/2022
EXECUTIVE VICE PRESIDENT	DAVIS, JEFF	03/28/2022
CITY ATTORNEY	BARGAR, JUSTIN	04/05/2022