



SAN DIEGO
HOUSING
COMMISSION

Moving Forward Moving To Work Program Annual Plan for Fiscal Year 2013

San Diego Housing Commission
Rental Assistance Department
1122 Broadway, Suite 300
San Diego, CA 92101
www.sdhc.org



TABLE OF CONTENTS

Section I:	Introduction and Overview	1
A.	Introduction.....	1
B.	Goals and Objectives.....	1
Section II:	General SDHC Operating Information.....	5
A.	Housing Stock Information.....	5
B.	Leasing Information Planned.....	6
C.	Waiting List Information.....	6
Section III:	Non-MTW Related Housing Authority Information (Optional)	7
A.	Planned Sources and Uses of Other HUD and Federal Funds – N/A.....	7
B.	Description of Non-MTW Activities.....	7
Section IV:	Long-Term MTW Plan (Optional).....	9
Section V:	Proposed MTW Activities: HUD Approval Requested.....	10
1.	MTW VASH Program	10
2.	Family Self Sufficiency Reinvention	13
3.	Elimination of 100% Excluded Income from Income Verification Process.....	15
4.	Public Housing: Flat Rent Elimination.....	17
5.	Homeless Veteran Project-Based Subsidy Program	20
6.	Short-Term Transitional Supportive Project-Based Program for the Homeless.....	23
7.	Two-Year PBV Occupancy Requirement (Re-proposed).....	27
8.	Sponsor-Based Voucher Program for the Homeless (Re-proposed)	30
9.	New Public Housing Transition	33
Section VI:	Ongoing MTW Activities: HUD Approval Previously Granted.....	38
	Ongoing MTW Activities Matrix.....	38
Section VII:	Sources and Uses of Funding.....	40
A.	Planned Sources and Uses of Funding	40
B.	Sources and Uses of State or Local Funds.....	41
C.	Uses of the COCC	41
D.	Cost Allocation Fee for Service.....	41
E.	Single Fund Flexibility	41
	Update on Use of Replacement Housing Factor (RHF) Funds.....	43
Section VIII:	Administrative Information	44
A.	Copy of Board Resolution and Certification of Compliance – See Appendix A:	44
B.	Ongoing Agency Evaluations.....	44
C.	Evidence of Community and Resident Participation – See Appendix B:	44
Appendices:		
A.	Board Resolution and Certification of Compliance	
B.	Public Hearing notice and evidence of community and resident participation in developing MTW Plan	
C.	Affordable Housing Development: The 2011 and 2012 Experience	



SECTION I: INTRODUCTION AND OVERVIEW

A. INTRODUCTION

The San Diego Housing Commission (SDHC) was established in 1979 to administer the City's various affordable housing programs. In the past 33 years there has been an increasing need for viable housing solutions because property values have escalated producing a high cost housing market. Through the flexibility offered by the Moving to Work (MTW) demonstration program, SDHC is positioned to address the overwhelming needs of the City's economically disadvantaged population.

The initiatives contained in the Fiscal Year 2013 MTW Annual Plan include streamlining rental assistance activities to further simplify programs. SDHC is working closely with the local Veteran's Administration staff to address the needs of HUD-VASH Voucher participants as SDHC received a special waiver in 2010 to include these vouchers in MTW administration. SDHC is also partnering with the Veterans Village of San Diego to create a transitional housing program for homeless veterans.

Preparations are also underway for the implementation of Path to Success, our rent reform initiative, which begins in Fiscal Year 2014.

This proposed plan demonstrates SDHC's commitment in achieving the main objectives of the MTW program.

B. GOALS AND OBJECTIVES

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

- ✓ Streamlining administrative processes to ensure Federal expenditures are utilized efficiently and effectively;
- ✓ Increasing efforts toward promoting self-sufficiency among Path to Success participants through the SDHC Achievement Academy self-sufficiency programs;
- ✓ Creating programs to serve the diverse homeless populations in San Diego;
- ✓ Acquiring, preserving, and/or developing affordable housing units to increase housing choices in San Diego.

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

1. *MTW VASH Program.* SDHC requests permission to implement a special program designed specifically for the HUD-VASH voucher participants. Program features will be the elimination of minimum rent for an initial time period, streamlined criminal history requirements for household members, and additional streamlining measures.
2. *Family Self Sufficiency Reinvention.* SDHC seeks MTW flexibility to modify the current Family Self Sufficiency (FSS) Program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program and contract will be made to increase program accessibility and participant engagement.



3. *Elimination of 100% Excluded Income from the Income Verification Process.* Excluded income has no effect on the rental assistance calculation yet consumes administrative time as it must be verified and reported on the HUD 50058. This initiative would remove the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058.
4. *Public Housing: Flat Rent Elimination.* SDHC proposes to eliminate flat rents in public housing in order to facilitate the implementation of Path to Success for public housing residents.
5. *Homeless Veteran Project-Based Subsidy Program.* SDHC proposes to partner with the Veterans Village of San Diego to create a local, non-traditional project-based subsidy program to provide housing to veterans who are either not yet ready to enter the more regulated Veterans Village program or who temporarily exit the program. This will be a transitional pilot program with a flat subsidy and is expected to initially provide housing for up to 30 homeless veterans.
6. *Short-Term Transitional Supportive Project-Based Vouchers for the Homeless.* SDHC is requesting MTW flexibility to partner with agencies to craft a transitional housing program using flat-subsidy project-based vouchers paired with supportive services, offered by the selected provider agency. The pilot for this activity will be a 16 voucher program designed to serve special needs homeless individuals in a new homeless housing and service development called Connections Housing.
7. *Two-Year PBV Occupancy Requirement (Re-proposed).* Approval for this initiative was granted in SDHC's Fiscal Year 2011 MTW Annual Plan. A re-proposal is being made to add a component allowing no more than 15% of the tenants in any given development who become eligible to transition to a tenant-based voucher in any given year and no more than 10% in any given month to move from the PBV assisted complex. This will alleviate administrative burden due to turn over and keep as many families housed as possible.
8. *Sponsor-Based Voucher Program for the Homeless (Re-proposed).* Approval for this initiative was granted in SDHC's Fiscal Year 2011 MTW Annual Plan. A re-proposal is being made to increase program capacity and widen the population of homeless persons served.
9. *New Public Housing Transition.* SDHC is in the process of converting and renovating 113 state-aided units to public housing. The 113 units include 112 state-assisted units and one manager's unit. The rent calculation under the state program requires participants to pay 25 percent of their adjusted income toward their rent portions whereas public housing requires 30 percent. To ease the transition, SDHC is proposing to implement a transition period during which the families would pay more than 25 percent but less than 30 percent of adjusted household income toward the rent portion before moving to 30 percent at the end of the transition period.



MTW INITIATIVE UPDATE

In previous MTW Annual Plans, SDHC proposed a total of 24 initiatives for implementation. Additionally, HUD provided authorization for the creation of an Economic Development Academy (EDA), now known as the SDHC Achievement Academy of the San Diego Housing Commission, in Fiscal Year 2009. SDHC would like to take the opportunity to highlight the progress of selected initiatives implemented thus far.

- ✓ 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 Loan, and 40% Family Share Affordability Cap Elimination 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 the opportunity to participate in a Security Deposit Assistance program and a potential waiver of the 40% Affordability Cap. The last and most significant element to the approach, increased payment standards for MTW participants moving to or living within the low-poverty areas, began June 1, 2010.
- ✓ A Housing Choice Voucher Homeownership Program, known as the “Home of Your Own” program, 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, nine families have purchased a home using the program as a mechanism for mortgage assistance. Applications continue to be received and processed.
- ✓ The SDHC Achievement Academy officially opened in SDHC’s main office building in October 2010. The SDHC Achievement Academy offers the Family Self Sufficiency program as a core curriculum and presents a variety of classes and workshops geared toward workforce preparation, computer skills, and financial skills education. The resources offered at the SDHC Achievement Academy will be a vital component of Path to Success as program participants work towards increasing income and focusing on economic independence.
- ✓ The Sponsor-Based Voucher Program for the Homeless began leasing in early Fiscal Year 2012 with four service providers and increments of approximately 25 vouchers each allocated by SDHC. One program is called Home Again: Project 25; the United Way and the County of San Diego provide housing placement and a full array of supportive services to house and support 25 persons identified as being among the most frequent users of public emergency services. The other local program is called the Campaign to End Homelessness Registry Week. Saint Vincent de Paul Villages, Inc., Community Research Foundation, and Mental Health Systems use the remaining 75 vouchers to pay for housing for mentally ill chronically homeless individuals. For these, the County of San Diego provides housing placement and supportive services through its Full Services Partners funded by California’s Mental Health Services Act. Implemented as a pilot program, the approach to addressing issues of persistent homelessness combines supportive services with a housing first model. Intensive case management is also a critical component of the program as participants require comprehensive services to address an array of issues perpetuating homelessness.



- ✓ The Biennial Reexamination cycle for families termed “Work-Able” begins with July 2012 reexaminations. This new process is expected to save significant staff time which will be redeployed toward other ventures within the department and agency, such as our SDHC Achievement Academy.



SECTION II: GENERAL SDHC OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

1. Number of public housing units – **75**
2. Capital Fund Expenditures: SDHC has applied to the California Department of Housing and Community Development and HUD for the conversion of six SDHC-owned assets to public housing for a total of 112 public housing units. If approved, a combination of funds (local funds, Community Development Block Grant, MTW public housing repositioning fees, replacement housing factor [RHF] funds, and MTW funds) will be used in Fiscal Year 2013 and Fiscal Year 2014 for rehabilitation and conversion.
3. New public housing units – **112**

Development Name	Number of Units	Unit Type	Number of Bedrooms					Accessibility Features	Number of Accessible Units
			1	2	3	4	5+		
Scattered Sites	113	Low-Rise Apartment	0	97	16	0	0	Wheelchair Accessible	20

4. Number of public housing units to be removed – **0**
5. Number of MTW HCV units authorized – **13,929** (This number includes the enhanced and project-based vouchers to be converted to MTW during Fiscal Year 2013; 200 NED vouchers awarded via a NOFA in Fiscal Year 2001 have been identified and removed from this number since the NEDs are no longer treated as part of the allocation)
6. Number of non-MTW HCV units authorized – **735** (Number adjusted to include 200 NED vouchers awarded in Fiscal Year 2001; the action complies with PIH 2011-32)

Authorized Non-MTW Vouchers	
Program	Number of Units
Enhanced/Protection	0
Non-MTW PBV	0
VASH	435
FUP	100
Tenant-Based NED	100
PBV NED*	100
Total:	735

*Previously reported in the matrix as AB 2034

7. Number of HCV units to be project-based – **304** (Please see the matrix below for a detailed description of each PBV development including Connections Housing)



Development Name	PBV Start Date	Total No. of Units in Development	Total No. Project Based Units Authorized in Development	% of Project Based Units Leased Up in Development	Population
Becky's House	2/1/2002	9	2	22%	Homeless
Take Wing	7/1/2002	33	8	24%	Homeless
Hollywood Palms	12/23/2002	94	23	24%	Low-Income
Leah Residence	7/1/2005	24	9	38%	Homeless
Townpeople	9/1/2009	24	9	38%	Homeless
Stepping Stone	1/1/2010	8	6	75%	Homeless
Potiker	2/1/2010	200	36	18%	Low-Income
Alabama Manor	4/28/2010	67	15	22%	Low-Income
Meade (SDHC-Owned)	4/28/2010	30	29	97%	Low-Income
Santa Margarita (SDHC-Owned)	5/1/2010	32	32	100%	Low-Income
Courtyard (SDHC-Owned)	10/1/2010	37	7	19%	Low-Income
Hotel Sanford (SDHC-Owned)	11/1/2010	130	39	30%	Low-Income
Connections Housing	Pending	223	89	40%	Homeless
Total		911	304	33%	

B. LEASING INFORMATION PLANNED

1. Anticipated total number of MTW PH units leased in Plan year – **187** (Pending HUD's adoption of the 112 units into the public housing program, SDHC anticipates full leasing of the new units by the close of Fiscal Year 2013)
2. Anticipated total number of non-MTW PH units leased in Plan year – **0**
3. Anticipated total number of MTW HCV units leased in Plan year – **13,929** (This number includes the enhanced and project-based vouchers to be converted to MTW during Fiscal Year 2013; 200 NED vouchers awarded via a NOFA in Fiscal Year 2001 have been identified and removed from this number since the NEDs are no longer treated as part of the allocation)
4. Anticipated total number of non-MTW HCV units leased in Plan year – **735** (Number adjusted to include 200 NED vouchers awarded in Fiscal Year 2001; the action complies with PIH 2011-32)
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 there will be any potential difficulties in leasing public housing or Housing Choice Voucher units.
6. Optional: Number of project-based vouchers at start of plan year – **215**

C. WAITING LIST INFORMATION

SDHC will continue to have community wide waiting lists for the Housing Choice Voucher (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.

The HCV waiting list was updated in late Fiscal Year 2011 and currently contains 31,218 families. The public housing waiting list currently contains 18,640 families.



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. Description of non-MTW activities –

Development

During Fiscal Years 2011 and 2012, SDHC participated in the development of 1,109 units of additional affordable housing within the City of San Diego. Please see Appendix C for a detailed description of the development activities.

Project Homeless Connect

For the second year, SDHC is the lead organizer for Project Homeless Connect, a one-day resource fair for San Diego's homeless individuals and families. Numerous services are provided such as medical evaluations, housing referrals, dental screenings, and haircuts.

This year SDHC released a report providing a snapshot of 660 homeless individuals who participated in the 5th Annual Project Homeless Connect, held on January 5, 2011. The findings were based on 547 surveys.

Project Homeless Connect is held in January. Major organizing partners working with SDHC are the Family Health Centers of San Diego, St. Vincent de Paul Villages, and the Interfaith Shelter Network.

Helping Homeless Veterans

One of the greatest tragedies of homelessness is how many veterans are affected—as many as 40 percent of San Diego's homeless are veterans.

The San Diego Housing Commission is an investment partner in Veterans Village of San Diego, the region's largest provider of housing and social services for homeless veterans.

The agency has invested \$8.7 million to help create 320 transitional beds. In addition, SDHC is helping Veterans Village develop a new, 24-bed facility for Iraq and Afghanistan veterans, to be completed in 2012.

Cutting-Edge Finance Plan

The San Diego Housing Commission's cutting-edge finance plan reflects an approach similar to a proposed U.S. Department of Housing and Urban Development (HUD) initiative, which encourages housing authorities to tap into their equity and create public/private partnerships to preserve and produce more affordable housing.

SDHC was one of the first agencies in the nation to adopt this entrepreneurial real estate investment strategy in partnership with for-profit and non-profit developers and redevelopment agencies to purchase foreclosures, build new affordable rental homes for workforce families, rehabilitate older homes, and preserve senior housing.



Through this finance plan, by leveraging \$95 million as a result of the former public housing disposition, the agency is creating an additional 832 affordable housing units, far exceeding the 350 units required by HUD when SDHC opted out of the federal government's public housing program in 2007. SDHC has also met with a number of housing authorities who are interested in this model.



SECTION IV – LONG-TERM MTW PLAN (OPTIONAL)

The San Diego Housing Commission has developed a long-term vision for MTW to:

- Create more affordable housing units in the City of San Diego;
- Enhance and further streamline the Housing Choice Voucher and public housing programs; and
- Provide new housing solutions for San Diego's homeless.

SDHC continues to find ways to do more with less. We are creating initiatives to help the agency run more efficiently, while providing housing assistance for those who need it most. In these difficult economic times, SDHC sees an even greater need to help families become more self-reliant.

As proposed in the Fiscal Year 2012 MTW Annual Plan, the agency will implement Path to Success, a major rent reform to:

- Help families increase their income and complete their education;
- Enhance customer service;
- Streamline the rent calculation and other administrative processes;
- Use Federal dollars more efficiently and leverage the savings to assist more low-income families; and
- Improve participants' understanding of the Housing Choice Voucher and public housing programs.

Also in Fiscal Year 2013, SDHC will continue its efforts to address homelessness. We have included in this plan a new initiative to assist the underserved homeless veteran population with a new transitional housing program in partnership with the Veterans Village of San Diego.

Move to Work allows SDHC to design and restructure programs to target local needs. Through these efforts, we improve the lives of San Diego's low-income families.



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
Fiscal Year 2013 (July 1, 2012 to June 30, 2013)			
1. MTW VASH Program	X		X
2. Family Self Sufficiency Reinvention	X	X	
3. Elimination of 100% Excluded Income	X		
4. Public Housing: Flat Rent Elimination	X		X
5. Homeless Veterans Project-Based Subsidy Program	X	X	X
6. Short-Term Transitional Supportive Project-Based Program for the Homeless	X	X	X
7. Two-Year PBV Occupancy Requirement (Re-Proposed)	X		
8. Sponsor-Based Voucher Program for the Homeless (Re-Proposed)	X	X	X
9. New Public Housing Transition			X

1. MTW VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH) VOUCHER PROGRAM

On May 27, 2010 SDHC received regulatory and statutory waivers from the Housing Voucher Management and Operations Division of HUD for administration of the HUD-VASH Voucher Program using certain elements of MTW authority. SDHC has implemented a number of initiatives since that time to ease administration and provide benefits to the VASH participants, while ensuring that the VASH protections remain. As directed in the approval received from HUD, the Local Interim Policy has not and will not affect the VASH participants.

The VASH participants are a group of persons with unique needs. Ongoing discussions between SDHC and Veteran’s Administration (VA) staff have focused on designing initiatives benefiting both the VASH participants and staff conducting the program administration. To this end, SDHC is proposing to adapt the program to implement a distinct set of policies:

- Currently VASH applicants are subject to a less stringent review of their criminal history than all other HCV program applicants. However, when a VASH applicant or participant wishes to add a member to their household, the new member is held to the higher standard. It is proposed that any adults the VASH applicant/participant wishes to add to his or her household have a reduced criminal history initial requirement: No violent or drug-related criminal activity in the two years preceding application. Please Note: The reduced criminal history requirements for family members still preclude individuals from participating in the program if subject to registration as a sex offender.



- It has been found that VASH applicants/participants often have difficulty paying a minimum rent when beginning the VASH program due to initial limited/zero income. Most participants gain an income source through VA case management assistance during the first year on the program. To facilitate this transition, minimum rents shall be set at zero for the first 12 months of program participation. After the first 12 months, minimum rent shall be set at \$50.
- Income garnishments that VASH participants experience will not be counted as income for the first 12 months of program participation. It has been found that when VASH participants obtain benefits after long periods of having no income source, garnishments for things such as child support and debt collections are attached to these income sources. This discourages these persons from seeking income and makes it more difficult to successfully pay their rent portions. It is anticipated a 12 month reprieve will counteract this situation for VASH participants.
- To coincide with SDHC's rental assistance program administration, utility reimbursements will not be a part of the SDHC VASH program.
- To coincide with SDHC's rental assistance program administration, VASH participants will be eligible for the biennial inspection cycle. The same criteria by which the general rental assistance program participants gain admission to the cycle must also be met.

Anticipated Impact: SDHC anticipates that the implementation of policies tailored specifically for the VASH program participants will make the VASH program more accessible for the veterans referred to and participating in the VASH voucher program. It is also believed the VASH participants will be more successful, an increased number will have income, and participants acquire the ability to remain on the VASH program for longer periods of time.

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:

- VASH voucher utilization percentage is 69% (Please note: SDHC recently received an additional 75 VASH vouchers in Fiscal Year 2012 and is in the process of leasing these new vouchers)
- Total percentage of VASH program participants with at least one source of income is 93%
- Total percentage of VASH program participants remaining on the VASH program for 12 months or more is 62%
- Average number of months a VASH program participant remains on the VASH program is 16

Benchmarks:

- VASH utilization rate will increase to 100% by June 30, 2013
- Total percentage of VASH program participants with at least one source of income will increase to 95% by June 30, 2013
- Total percentage of VASH program participants remaining on the program for over 12 months will increase to 80% by June 30, 2013
- Average number of months a VASH program participant remains on the VASH program will be 18 by June 30, 2013



Metrics:

- VASH voucher utilization percentage
- Total percentage of VASH program participants with a least one source of income
- Total percentage of VASH program participant remaining on the VASH program for longer than 12 months
- Average number of months a VASH program participant remains on the VASH 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 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:

Description of Authorization or Regulation Waived: HUD Waiver approval concerning the administration of HUD-VASH Vouchers dated May 27, 2010 (see attachment X). MTW Agreement Attachment C, Section D (2) (a) containing waivers of Sections 8 (o) (1), 8 (o) (2), 8 (o) (3), 8 (o) (10), and 8 (o) (13) (H-I) of the U.S. Housing Act of 1937 and 24 CFR 982.508, 982.503, and 982.518.

MTW Veterans Affairs Supportive Housing (VASH) Voucher Program						
Metric	Baseline 2012	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
VASH voucher utilization percentage	69%			100%	June 30, 2013	
Total percentage of VASH program participants with at least one source of income	93%			95%	June 30, 2013	
Total percentage of VASH program participants remaining on the VASH program 12 months or longer	62%			80%	June 30, 2013	
Average number of months a VASH program participant remains on the VASH program	16			18	June 30, 2013	

Hardship Policy: All of the proposed policies will have a solely positive effect on the VASH participants. There are zero current VASH participants currently receiving the utility reimbursement payment. Once this policy is in place, current participants will be eligible for an automatic hardship policy for a 12 month waiver/implementation period wherein they will still receive the payment, should their income level warrant it. The payment will be eliminated after 12 months. All new applicants/participants will adhere to the new policy.



2. Family Self Sufficiency Reinvention

SDHC seeks MTW flexibility to modify the current Family Self Sufficiency (FSS) Program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program and contract will be made to increase program accessibility and participant engagement.

Revise FSS Contract

SDHC will internally develop a revised Contract of Participation for program use to outline new requirements, including FSS contract term and participant roles and responsibilities. SDHC proposes to reduce the initial FSS contract term from five to two years to align with the biennial reexamination cycle. Participants may extend the contract term up to three years as stated in the FSS Program Contract of Participation. Reducing the contract term will encourage participants to complete self-sufficiency goals in a timely manner and increase the number of available slots for new participants to take advantage of the program.

Reinvented FSS Escrow Calculation

SDHC proposes to revise the FSS escrow calculation from escrow credits based solely on earned income increases to providing escrow credits for participants who demonstrate behaviors that maximize the likelihood of increasing financial stability and self-sufficiency. The revised calculation will provide escrow credits based on completed outcomes, including income increases, initial activities completed, annual engagement, establishing savings, and voluntarily surrendering rental assistance due to becoming self-sufficient. Revising the escrow calculation will reduce the amount of staff time required to maintain escrow account balances. Participants may apply for qualified interim withdrawals as stated in the FSS Program Contract of Participation.

The means by which a participant will be able to add escrow credits to his or her account are as follows:

- When Path to Success begins, Work-Able families will be placed on a Tiered Rent Table, with rent portions calculated according to the lower edge of each tier's income band. As participants increase earned income and move into higher income bands, deposits will be placed into the family's FSS escrow account.
- To build a strong foundation and maximize the contract term, an escrow account will be established and an initial escrow deposit will be posted if program participant successfully achieves outcomes outlined in the Individual Training and Service Plan (ITSP).
- Participants who establish a personal savings account and save a designated amount by the end of the FSS contract term will receive an additional escrow credit once verification is provided at the end of the contract term. The verification must also demonstrate the family established regular savings patterns over the course of FSS participation to be eligible for the escrow credit.

Semi-annually, participants will be required to complete mandatory follow-up consultations with Program Coordinators to report on outcomes to be eligible to continued FSS program participation.

Outcomes triggering escrow deposits will be reviewed and verified at semi-annual consultations with Program Coordinators. The maximum escrow balance participants may receive upon program graduation is \$10,000.



Relation to Statutory Objectives: Reduce cost and achieve greater cost effectiveness in Federal expenditures. Provide incentives to families engaged in programs and services towards achieving self-sufficiency.

Anticipated Impact: Reducing the contract term and revising the escrow calculation will allow more participants to take advantage of the FSS Program. As the SDHC Achievement Academy is currently heavily relied upon to assist the Work-Able population with increasing earned income, new rental assistance participants will begin to seek assistance in their self-sufficiency path. Supporting the new clientele with incentives to keep them engaged provides assistance towards career advancement, increased savings, and ultimately becoming self-sufficient. A transition plan for current FSS families will be established.

This initiative also allows SDHC to maximize and further align current efficiencies and streamlining measures outlined in the Path to Success rent reform initiative. The amount of staff time spent on escrow calculations will decrease due to the new system of providing escrow credits based on outcomes rather than tied only to incremental increases in income.

SDHC expects the FSS Escrow Calculation revision will save approximately 0.5 FTEs, therefore achieving greater cost effectiveness in Federal expenditures. The saved FTEs may be reallocated within SDHC to various capacities.

Baselines, Benchmarks, and Metrics:

Baselines:

- Total annual hours expended per escrow account calculation is 8
- Total annual FTE required to perform escrow calculations is 1
- Annual number of reinvented escrow accounts is 0
- Percentage of FSS participants who have escrow accounts is 40%
- Annual number of FSS graduates is 16
- Annual number of new FSS family savings accounts is 0

Benchmarks:

- Total annual hours expended per escrow account calculation will be 4 by June 30, 2015
- Total annual FTE required to perform escrow calculations will be .5 by June 30, 2015
- Annual number of reinvented escrow accounts will be 25 by June 30, 2015
- Percentage of FSS participants who have escrow accounts will be 50% by June 30, 2015
- Annual number of FSS graduates will be 19 by June 30, 2017
- Annual number of new FSS family savings accounts will be 25 by June 30, 2015

Metrics:

- Total annual hours expended per escrow account calculation
- Total annual FTE required to perform escrow calculations
- Annual number of reinvented escrow accounts
- Percentage of FSS participants who have escrow accounts
- Number of FSS graduates
- Annual number of new FSS family savings accounts



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:

Family Self Sufficiency Reinvention								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Total annual hours expended per escrow account calculation	8					4	June 30, 2015	
Total annual FTE required to perform escrow calculations	1					.5	June 30, 2015	
Annual number of reinvented escrow accounts	0					25	June 30, 2015	
Percentage of FSS participants who have escrow accounts	40%					50%	June 30, 2015	
Annual number of FSS graduates	16					19	June 30, 2017	
Annual number of new FSS family savings accounts	0					25	June 30, 2015	

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

3. ELIMINATION OF 100% OF EXCLUDED INCOME REQUIREMENT FROM THE INCOME VERIFICATION PROCESS

In support of the MTW goal of attaining increased cost effectiveness in its operation, SDHC will not verify, count, or report income amounts specifically identified by HUD as 100% excluded from the income calculation process, as well as earnings for full time students ages 18 to 23, which are 100% excluded through a prior approved MTW initiative. Examples of 100% excluded income are earnings from minors, foster care payments, amounts paid by a State agency to the family for the care of a family member with a developmental disability, and food stamps. Note:



SDHC has elected to continue reporting to HUD, as excluded income, categories of income that are not excluded at 100%. For example, payments for adoption parents in excess of \$480.

Although HUD regulates which income must not be included when calculating rental assistance in accordance with 24 CFR 5.609(c), the HUD 50058 requires SDHC to report all family income, including income that is excluded from the rental assistance calculation process. Given the numerous sources of 100% excludable income, the cost and time related to the verification and calculation of excluded income is significant and causes unnecessary administrative and financial burdens to the agency as well as inviting unnecessary errors in the reporting and calculation process.

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

Anticipated Impact: SDHC anticipates this activity will increase staff productivity, reduce administrative costs, and will help improve accuracy of family income calculations. The proposed activity generates administrative efficiency and staff cost savings by eliminating the process of verifying, calculating, reporting, counting, and finally excluding income with no effect on the amount of the family's housing assistance.

Baselines, Benchmarks, and Metrics:

Baselines:

- Number of families with one or more types of income 100% excluded from the income calculation process is 2,137
- Annual number of hours verifying and calculating excluded income is 567
- Annual salary cost for verifying and calculating 100% of excluded income is \$11,907
- Annual income calculation error rate is 17%

Benchmarks:

- Number of families with one or more types of income 100% excluded from the income calculation process will be 0 June 30, 2014
- Annual number of hours verifying and calculating excluded income will be 0 by June 30, 2014
- Annual salary cost for verifying and calculating 100% of excluded income will be \$0 by June 30, 2014
- Annual income calculation error rate will be 15% by June 30, 2014

Metrics:

- Number of families with one or more types of income 100% excluded from the income calculation process
- Annual number of hours verifying and calculating excluded income
- Annual salary cost for verifying and calculating 100% of excluded income
- Annual income calculation error rate



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:

Elimination of 100% of Excluded Income from the Income Verification Process								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Number of families with one or more types of income 100% excluded from the income calculation process	2,137					0	June 30, 2014	
Annual number of hours verifying and calculating excluded income	567					0	June 30, 2014	
Annual salary cost for verifying and calculating 100% of excluded income	\$11,907					\$0	June 30, 2014	
Annual income calculation error rate	17%					15%	June 30, 2014	

Description of Authorization or Regulation Waived: MTW Agreement Attachment C, Section C(4) containing waivers of Sections 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(2)(a) containing waivers of Section 8(o)(1), 8(o)(2), 8(o)(10), 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.518.

4. PUBLIC HOUSING: FLAT RENT ELIMINATION

As a complement to the Path to Success rent reform initiative, SDHC proposes to eliminate the flat rent option from the public housing program. Currently, public housing tenants choose either a rent portion calculated at 30 percent of adjusted monthly income or a flat rent amount which is tied to the market value of the unit. Tenants with higher annual incomes benefit from the flat rent option since the flat rent is typically less than a rent portion based on adjusted income. The proposed initiative removes the flat rent option, thus requiring all tenants to pay a rent portion based on adjusted income. This ensures tenants have a rent portion based on the ability to pay and equalizes the contributions towards housing among both lower and higher income tenants. Tenants are not negatively impacted by the initiative since the rent portion is still affordable to the household regardless of income levels.

Effective July 2013, all public housing families will be subject to the Path to Success rent calculation, an approved rent reform activity. This policy may be superseded by other regulations (California Tax Credit Property) governing a development.



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

Anticipated Impact and Impact Analysis: By eliminating flat rents, SDHC can provide its public housing stock to the intended population: Low-income families. The option of flat rent benefits higher income tenants. Families with higher incomes typically elect the flat rent option because it is less costly than the income-based alternative. Once flat rent is no longer an option, income-based rents will incentivize families with higher incomes to move to unassisted housing available in the community. The public housing units, with its deep subsidy, would be available to families on the public housing wait list, which currently holds almost 19,000 applicants.

Additionally, the elimination of the flat rent would provide administrative savings through discontinuing the associated research, notifications, and record-keeping to maintain the program. Currently, there are two families using the flat rent option. The matrix details the individual impact of the initiative on each family:

Households Experiencing of Rent Portion Increase: Detailed Impact Analysis					
Household	Bedroom Size	Percent AMI	Flat Rent	Income Based Rent	% Increase
#1	2	75%	\$1,000	\$1,560	56%
#2	3	60%	\$985	\$1,479	50%

*Data as of May 1, 2012

A comprehensive summary impact analysis for the entire public housing program is illustrated in the chart below:

Flat Rent Elimination Impact Analysis		
Households	Number	Percent
Experiencing a Rent Portion Decrease	0	0%
Experiencing a Rent Portion Increase	2	3%
Experiencing No Change to Rent Portion	73	97%
Total:	75	100%

*Data as of May 1, 2012

Due to the increase in rent portion, a transition period will be provided to the families.

Baselines, Benchmarks, and Metrics:

Baselines:

- Number of public housing families paying a flat rent is 2
- Number of public housing units made available for households at or below 80% AMI is 0

Benchmarks:

- Number of public housing families paying a flat rent will be 0 by June 30, 2014



- Number of public housing units made available for households at or below 80% AMI will be 5 by June 30, 2014

Metrics:

- Number of public housing families paying a flat rent
- Number of public housing units made available for households at or below 80% AMI

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:

Public Housing: Flat Rent Elimination								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Number of public housing families paying a flat rent	2					0	June 30, 2014	
Number of public housing units made available for households at or below 80% AMI	0					5	June 30, 2014	

Authorization to Conduct the Activity: MTW Agreement Attachment C, Section C (11) containing waivers of Section 3 (a) (2), 3 (a) (3) (A), and 6 (l) of the U.S. Housing Act of 1937 and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, 960.255, and 966 Subpart A.

Potential Undesirable Outcomes

Families electing to pay the flat rent are typically of a higher income band. With the elimination of the flat rent, higher-income families will potentially pay a higher monthly rent based on their income instead of electing the flat rent. Although such an increase would be an incentive to move to unassisted rental housing or homeownership, this is a temporary negative impact. A re-evaluation of this policy will be completed on an annual basis.

Hardship Policy: A family may request a hardship claim, as specified in SDHC’s Admissions and Continues Occupancy Plan for Conventional Public Housing.



5. HOMELESS VETERAN PROJECT-BASED SUBSIDY PROGRAM (HVPBS)

SDHC requests authorization to craft a unique local, non-traditional housing program to assist veterans in San Diego by partnering with the Veterans Village of San Diego (VVSD). VVSD provides services to more than 2,000 military veterans, men and women, who have served their country. VVSD offers a “one of a kind” approach that provides a Continuum of Care with a full range of comprehensive and innovative services for military veterans. Pete Dougherty, the national Director of VA Homeless Programs, has said, “There is no finer program for homeless veterans in America than VVSD.”

This worthwhile partnership will facilitate the creation of a transitional housing program which will provide a flat rental subsidy to VVSD to house 30 homeless veterans. The program will be implemented as a pilot; the number of individuals served may increase if the program proves successful and if need and/or funding allows. Transitional in nature, the program participants will be provided with a housing subsidy for up to 12 months while maintaining program eligibility.

Currently, the housing and service programs provided by VVSD are governed by a “dry” policy: No alcohol or drug use is permitted on the premises, and there is a zero tolerance for consumption. A substantial need for a housing program for veterans who are not yet able to begin alcohol/drug treatment and/or who have temporarily relapsed and must exit the traditional Veterans Village program has been identified. This program would function as a “safe haven” for these individuals, a place to reside for a short period of time, anticipated to be anywhere from ten days to six months, during a relapse or before they are ready for the VVSD’s more stringent program. During their time in this program, the individuals will have a roof over their head and be provided with supportive services, allowing them to stay “off the streets” and given the opportunity to choose to re-enter the traditional Veterans Village program or receive referrals for other more appropriate programs/treatment. Alcohol and drug use will not be permitted on the premises, but as a “safe haven”, as long as the residents abide by program policies and do not disturb other residents, off-site consumption *would not* be cause for program termination. Policy surrounding this issue will be included in program policy documents.

The units will be owned and managed by VVSD. A development currently owned by VVSD has been identified as a potential program site, though due to several factors another site may ultimately be selected. It is envisioned that one or two bedroom units will house two residents per bedroom, for a total initial program capacity of up to 30 individuals. As stated above, if the program is successful and expansion is feasible, the program will be expanded over time.

It is proposed that the subsidy provided will be a flat, per bed subsidy and the total will be based on the number of beds authorized and occupied in the program. As the income levels of the homeless are generally extremely-low, an income calculation for the tenants will not be conducted. Tenant rent portions will be set by VVSD with the formula subject to review by SDHC.

The units will be required to pass HQS inspection. Due to the expected short time periods during which the veterans will be housed and engaged in this program, inspections will not be dependent upon the tenant occupancy. It is proposed that all units in each development will be inspected during the same time period and on set schedules, with additional HQS inspections performed as needed.



Supportive services will be provided and funded by VVSD. Examples of services expected to be provided are as follows:

- Case management
- Drug and alcohol awareness
- On-site property/program management
- Veteran's Administration medical service access and transportation
- Referrals to other programs when necessary

As this program has been developed for a distinct population with an organization who can provide both supportive services and has a unique relationship with individuals who will be eligible for the program, a partnership will be formed and the subsidy for these units will be awarded without a competitive process.

Monitoring:

Program administration and auditing will be conducted by SDHC, including working with the VVSD staff to conduct a streamlined intake process, collecting vital information and documents for the purposes of verifying identification, homelessness status, and modified criminal history requirements.

VVSD will maintain a site-based waiting list and be required to certify that all veterans admitted to the program/development are homeless and meet the definition of low-income, at or below 80% of the Area Median Income (AMI). VVSD will also submit semi-annual reports to SDHC containing occupancy and program compliance information.

SDHC will report to HUD the participants in the program in PIC and VMS as "families served". SDHC proposes to pay VVSD an average monthly subsidy for each occupied bed. SDHC will consider a bed "fully occupied" if the bed was in use at least 25 days out of the month. Each month a bed is utilized according to this criterion will be considered a month a veteran was served for tracking and MTW reporting purposes.

Due to the transitional nature of this program, the extent of the SDHC's HCV waiting list, and the fact that these veterans are not receiving a voucher but living in a unit being subsidized as a local, non-traditional housing program, persons living in the HVPBS program will not be eligible to transfer their assistance to a tenant-based voucher. They may apply for the HCV waiting list and will be subject to the same regulations as all other families on the waiting list. The exit strategy for these participants will be either to enter/return the traditional VVSD program or to be referred to and engage in another more appropriate program.

Relation to Statutory Objectives: Reduce cost and achieve greater cost effectiveness in Federal expenditures. Increase housing choices for low income families. Provide incentives to families engaged in programs and services towards achieving self-sufficiency.

Anticipated Impact: The anticipated impact of this program will be to provide subsidy for rental units at a lower cost than a traditional tenant- or project-based voucher program, thereby housing more persons without increasing HUD funding. By providing a flat subsidy rate per unit, SDHC will reduce cost and achieve greater cost effectiveness in Federal expenditures. A housing program



for veterans that functions as a safe haven and does not contain a “dry” requirement will increase housing choices for those veterans who were unable to participate in such a program.

Potential Undesirable Outcomes: The subsidy will not be based on tenant income, but will be a flat rate per unit. Though not anticipated, this model may result in families paying a larger portion of their income for rent than a traditional rent calculation. The contract rents will be set by VVSD and subject to rent reasonableness. SDHC will track those individuals that are not successful in meeting the VVSD or alternative program requirements upon exiting this program.

Baselines, Benchmarks, and Metrics:

Baselines:

- Annual number of program participants (veterans served) is 0
- Annual number of bed months (count of months beds are fully occupied) is 0
- Annual subsidy paid for HVPBS Program is \$0
- Average per unit monthly subsidy paid for HVPBS Program is \$0
- Average annual lease up rate/occupancy percentage of authorized beds is 0%
- Percentage of program participants successfully transitioning to alternative programs is 0%
- Percentage of transitioned program participants completing/graduating from the alternative program is 0%

Benchmarks:

- Annual number of program participants (veterans served) will be at least 60 by June 30, 2013 (The goal is for veterans to participate in this program for no more than 6 months: 30 beds occupied by 30 veterans for 6 months in a 12 month period equals 60 veterans served)
- Annual number of bed months (count of months beds are fully occupied) will be 324 by June 30, 2014
- Annual subsidy paid for HVPBS Program will be less than \$180,000 by January 30, 2013
- Average per unit monthly subsidy paid will be less than \$500 by June 30, 2013
- Average annual lease up rate/occupancy percentage of authorized beds will be 90% by June 30, 2013
- Percentage of program participants successfully transitioning to alternative programs will be 90% by June 30, 2014
- Percentage of transitioned program participants completing/graduating from the alternative program will be 50% by June 30, 2014

Metrics:

- Annual number of program participants (veterans served)
- Annual number of bed months (count of months beds are fully occupied)
- Annual subsidy paid for HVPBS Program
- Average per unit monthly subsidy paid for HVPBS Program
- Annual lease up rate/occupancy percentage of authorized beds
- Percentage of program participants successfully transitioning to alternative programs
- Percentage of transitioned program participants completing/graduating from the alternative 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. A secondary reporting mechanism will be developed to collect data from partnering agencies. The partnering agencies will collect and input data into an Excel spreadsheet designed to analyze and present the data in a dashboard format. The data will be collected from the partnering agencies on a monthly 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:

Homeless Veteran Project-Based Subsidy Program								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of program participants (veterans served)	0					60	6/30/2013	
Annual number of bed months (count of months beds are fully occupied)	0					324	6/30/2014	
Annual subsidy paid for HVPBS Program	\$0					<\$180,000	6/30/2013	
Average per unit monthly subsidy paid for HVPBS Program	\$0					<\$500	6/30/2013	
Annual lease up rate/occupancy percentage of authorized beds	0%					90%	6/30/2013	
Percentage of program participants successfully transitioning to alternative programs	0%					90%	6/30/2014	
Percentage of transitioned program participants completing/graduating from the alternative program	0%					50%	6/30/2014	

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

6. SHORT-TERM TRANSITIONAL SUPPORTIVE PROJECT-BASED PROGRAM FOR THE HOMELESS

As stated in the Goals and Objectives section of this plan, one of SDHC’s main focuses is the creation of programs to serve the diverse homeless populations in the City of San Diego. To this end, SDHC is requesting MTW flexibility to partner with agencies to craft a short-term transitional housing program offering rapid re-housing, using flat project-based subsidy paired with supportive services, offered by the selected provider agency. It is envisioned the program could include either Single Room Occupancy (SRO) units or larger-sized units, depending on need and availability. This program will provide housing subsidy of a short-term nature to a special



homeless population who require specialized supportive services, including case management, before they are able to secure long-term housing.

The ability of SDHC to use MTW flexibility to provide housing subsidy for these units will fulfill a need for homeless persons who need more than a shelter bed and require comprehensive support to secure and maintain stable housing.

The pilot for this activity will be a 16 subsidy program designed to serve special needs homeless individuals in a new homeless housing and service development called Connections Housing. Connections Housing is an integrated service and residential community whose primary goal is to help homeless persons living on the neighborhood streets to rebuild their lives and secure and retain permanent housing. This center will be housed in the historic San Diego World Trade Center building located in the central neighborhood in downtown San Diego. Through a variety of funding sources coming together for this important purpose, the San Diego World Trade Center will be fully rehabilitated at the cost of \$33.9 million dollars. People Assisting the Homeless (PATH), an agency dedicated to “ending homelessness for individuals, families & communities” will be the service provider and building operator for this important endeavor.

Virtually every resource a person needs to break the cycle of homelessness will be available without ever leaving the building. Along with the 16 short-term SROs, Connections Housing will include 73 permanent supportive project-based housing units (two manager units) and 134 interim housing beds. The complex will also contain the PATH Depot, a one stop service center offering services such as case management, a life skills unit, women’s empowerment program, legal services, personal care services, and more. The Downtown Family Health Center will also be a part of the project, offering comprehensive medical and mental health care services. This project is the first of its kind in San Diego and was designed to serve the specific needs of the downtown area with the hope that it will be replicated in other San Diego neighborhoods.

SDHC will report the participants in the program to HUD in PIC and VMS as “families served”. SDHC proposes to pay a flat monthly subsidy for each occupied unit and the tenant’s portion may or may not be based on income, due to the unique circumstances of this vulnerable population. Because of the short-term nature of this program, SDHC will consider a unit “fully occupied” if the unit was in use at least 25 days out of the month. Each month a unit is utilized according to this criterion will be considered a month a participant was served for purposes of payment, tracking, and MTW reporting requirements.

Program Requirements

Waiting Lists: The service providing agency will create and maintain a site-based waiting list, which will be in compliance with Fair Housing Laws. It is expected that the program participants will be sought out from the neighborhood streets, and once the program is at capacity, a waiting list will ensue. SDHC will audit this list to ensure program compliance. Program participants will be encouraged to apply for and remain on SDHC’s tenant-based waiting list in order to transfer to the tenant-based voucher program. For the Connections Housing pilot program, they will also be placed on the Connections Housing permanent supportive housing project-based waiting list.

Inspections: The units will be required to pass HQS inspection. Due to the expected short time periods during which the participants will be housed and engaged in this program, inspections will



not be dependent upon the tenant occupancy. It is proposed all units will be inspected annually or every other year depending on the condition of the project.

Administration: Auditing will be conducted by SDHC, including working with the supportive services agency staff to conduct a streamlined intake process, collecting vital information and documents for the purposes of verifying identification, homelessness status, and modified criminal history requirements. The intake and exit information will be provided to SDHC who will maintain vital data on each unit and its occupants to provide to HUD. The supportive service agency will also be required to submit semi-annual reports to SDHC with information on occupancy per unit and program participation.

Partner Selection: Project-based subsidy for these programs will be awarded on a competitive basis. The exception will be if the program is housed in an SDHC-owned development, in which case the subsidy will be awarded non-competitively, per a prior HUD-approved MTW activity.

Relation to Statutory Objectives: Reduce cost and achieve greater cost effectiveness in Federal expenditures. Increase housing choices for low-income families. Provide incentives to families engaged in programs and services towards achieving self-sufficiency.

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, improve health, and increase housing choices. By using a flat subsidy model, shifting eligibility administrative functions to the supportive services agency, and eliminating the annual review process (participants are not expected to remain on the program for longer than 6 months), SDHC will reduce cost and achieve greater cost effectiveness in Federal expenditures.

Baselines, Benchmarks, and Metrics:

Please note that the baselines, benchmarks, and metrics are designed for the 16 unit Connections Housing pilot program. Once SDHC deems this a successful program, it may be expanded and the measurements will reflect this expansion. Changes to the metrics will be made in subsequent MTW Reports and Plans as required.

Baselines:

- Annual number of program participants (individuals served) is 0
- Annual number of unit months (count of months units are “fully occupied”) is 0
- Annual subsidy paid is \$0
- Average annual occupancy percentage of authorized beds is 0%
- Average per unit monthly subsidy paid is \$0
- Annual number of participants transitioning to stable housing is 0

Benchmarks:

- Annual number of program participants (individuals served) will be 96 by June 30, 2014 (The expected average a person will participate in this program is 2 months: 16 units occupied by 16 persons for 2 months in a 12 month period equals 96 persons served annually)
- Annual number of unit months (count of months units are “fully occupied”) will be 173 by June 30, 2014
- Annual subsidy paid will be less than \$115,200 by June 30, 2014



- Average annual occupancy percentage of authorized beds will be 90% by June 30, 2014
- Average per unit monthly subsidy paid will be less than \$600 by June 30, 2014
- Annual number of participants transitioning to stable housing will be 20 by June 30, 2014

Metrics:

- Annual number of program participants (individuals served)
- Annual number of unit months (count of months units are “fully occupied”)
- Annual subsidy paid
- Annual occupancy percentage of authorized beds
- Average per unit monthly subsidy paid
- Annual number of participants transitioning to stable housing

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. A secondary reporting mechanism will be developed to collect data from partnering agencies. The partnering agencies will collect and input data into an Excel spreadsheet designed to analyze and present the data in a dashboard format. The data will be collected from the partnering agencies on a monthly 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:

Short-Term Transitional Supportive Project-Based Program for the Homeless								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of program participants (individuals served)	0					96	6/30/2014	
Annual number of unit months (count of months units are “fully occupied”)	0					173	6/30/2014	
Annual subsidy paid	\$0					<\$115,200	6/30/2014	
Average annual occupancy percentage of authorized beds	0%					90%	6/30/2014	
Average per unit monthly subsidy paid	\$0					<\$600	6/30/2014	
Annual number of participants transitioning to stable housing	0					20	6/30/2014	

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



7. REQUIRE OCCUPANCY IN PBV DEVELOPMENTS FOR TWO YEARS BEFORE HOUSEHOLDS BECOME ELIGIBLE TO AVAILABLE TENANT-BASED VOUCHERS (RE-PROPOSED)

SDHC would like to re-propose this activity to add the additional component of a limitation on the percentage of families in a project-based development receiving a tenant-based voucher at any one time. Approval was granted in the Fiscal Year 2011 plan to replace the one-year occupancy requirement with a two-year occupancy requirement for PBV families before eligible for a tenant-based voucher. SDHC was granted the authority to undertake this activity for all PBV developments, except those designated as transitional housing. The baseline annual turnover rate for PBV families was 30 percent.

This initiative was successful in reducing turnover rates and administrative burden. It was realized that in order to ensure vacancy rates in PBV developments do not exceed a level compromising the sustainability of the property, it would be beneficial to request authorization to place tenants eligible for a tenant-based voucher onto a waiting list if the voucher issuances will create a high percentage of vacancies relative to the number of project-based units. In some instances, a high percentage of tenants within a development may become eligible for a tenant-based voucher within the same general timeframe. High vacancy rates may result if all tenants choose to exercise the tenant-based voucher option simultaneously.

SDHC proposes that no more than 15% of the tenants in any given development who become eligible to transition to a tenant-based voucher in any given year and no more than 10% in any given month would be allowed to move from the PBV assisted complex. A waiting list would be maintained for those wishing to move but who exceed the threshold. As is current policy, the availability of a tenant-based voucher would also be a factor.

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 two year of occupancy in order to obtain a tenant-based voucher. This will also reduce the administrative time for SDHC in processing changes in PBV tenancy thus achieving greater cost effectiveness in Federal expenditures. The ability to control vacancy rates created by tenant-based voucher issuances will also ensure vacancy rates are maintained at reasonable levels. 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 and so would be moving without rental assistance. A hardship policy is in place for this reason.

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:

- Annual percentage of families who vacate MTW PBV units before eligible for a voucher is 1%
- Annual number of families who vacate MTW PBV units before eligible for a voucher, with a voucher, due to hardship policy is 1



- Annual percentage of MTW PBV families who moved with a tenant-based voucher is 17%
- Percentage of MTW PBV developments with contracts beginning July 1, 2012 and after with this requirement is 0%
- Average annual turnover rate for MTW PBV units is 30% (2006-2009)
- Average annual vacancy rate of MTW PBV developments is 14%
- Annual number of MTW PBV tenants waitlisted due to the policy change is 0
- FTEs required to handle turnover of MTW PBV units is .4 FTE

Benchmarks:

- Annual percentage of families who vacate MTW PBV units before eligible for a voucher will be less than 5% by June 30, 2013
- Annual number of families who vacate MTW PBV units before eligible for a voucher, with a voucher, due to hardship policy will be less than 3 by June 30, 2013
- Annual percentage of MTW PBV who move with a tenant-based voucher will be less than 17% by June 30, 2013
- Percentage of MTW PBV developments with contracts beginning July 1, 2012 and after with this requirement will be 100% by June 30, 2013
- 50% reduction in annual turnover rate in MTW PBV units by June 30, 2013
- Average annual vacancy rates of MTW PBV development will be less than 10% by June 20, 2013
- Annual number of MTW PBV tenants waitlisted due to the policy change will be less than 30 by June 30, 2013
- FTEs required to handle turnover of MTW PBV units will be less than .2 FTE by June 30, 2013

Metrics:

- Annual percentage of families who vacate MTW PBV units before eligible for a voucher
- Annual number of families who vacate MTW PBV units before eligible for a voucher, with a voucher, due to hardship policy
- Annual percentage of MTW PBV families who move with a tenant-based voucher
- Percentage of MTW PBV developments with contracts beginning July 1, 2012 and after with this requirement
- Average annual turnover rate for MTW PBV units
- Average annual vacancy rate of MTW PBV developments
- Annual number of MTW PBV tenants waitlisted due to the policy change
- FTEs required to handle turnover of MTW PBV units

Potential Undesirable Outcome

- Annual percent of families who move without a tenant-based voucher prior to fulfilling the two-year occupancy requirement

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:



Require Two Year Occupancy Term for PBV Tenants Before Eligible for a Tenant-Based Voucher								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual percentage of families who vacate MTW PBV units before eligible for a voucher	1%					<5%	6/30/2013	
Annual number of families who vacate MTW PBV units before eligible for a voucher, with a voucher, due to hardship policy	1					<3	6/30/2013	
Annual percentage of MTW PBV families who move with a tenant-based voucher	17%					<17%	6/30/2013	
Percentage of MTW PBV developments with contracts beginning 7/1/2012 and after with this requirement	0%					100%	6/30/2013	
Average annual turnover rate for MTW PBV units	30%					50% reduction	6/30/2013	
Average annual vacancy rate of MTW PBV developments	14%					<10%	6/30/2013	
Annual number of MTW PBV tenants waitlisted due to the policy change	0					<30	6/30/2013	
FTEs required to handle turnover of MTW PBV units	.4					<.2	6/30/2013	
Potential Undesirable Outcomes								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Acceptable Level	Action Items
Annual percent of families who move without a tenant-based voucher prior to fulfilling the two-year occupancy requirement	0%						5%	

Description of Authorization or Regulation Waived: 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 Senior 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.”

8. SPONSOR-BASED VOUCHER PROGRAM FOR THE HOMELESS (RE-PROPOSED)

SDHC is re-proposing this activity to increase the capacity of the program, create the opportunity to serve distinct populations of homeless individuals, as well as clarify that participants will not be provided with a Housing Choice Voucher upon exiting a Sponsor Based Program. The objective of this program will be to facilitate the movement of homeless persons in San Diego into permanent housing by working in partnership with non-profit sponsors to combine comprehensive supportive services with MTW housing vouchers. This innovative program will serve the homeless of San Diego.

SDHC will provide 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 and Budgeting
- Personal Hygiene Training and Services
- Health and 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) will be utilized to create separate local, non-traditional housing programs for specific homeless populations, such as the most vulnerable homeless persons, homeless youth, homeless elderly and/or disabled persons, and etcetera. It is anticipated that up



to 1,000 vouchers will be utilized as sponsor-based vouchers to serve and house the homeless population of San Diego over the next five to seven years. This is an increase from the 100 vouchers initially designated for the program in the approved Fiscal Year 2011 initiative.

Sponsor-based vouchers 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 of using 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 homeless individuals, disabled individuals, and/or individuals with substance abuse issues.

Sponsor Selection: SDHC will publish a Request for Qualifications/Proposals 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. The vision of these programs will be that homeless persons will become program participants, receive housing and supportive services, and eventually be able to live independent from housing assistance. 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. SDHC requests the right to make exceptions to this policy in rare circumstances where a unique program designed with strict graduating requirements warrants an exemption.

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 generally adopt the Housing Choice Voucher rules and will include many of the SDHC MTW streamlining methods for income eligibility and rent calculations. The sponsors will be required to have a program plan defining 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. Provide incentives to families engaged in programs and services towards achieving self-sufficiency.



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:

- Annual number of program participants is 39
- Annual percentage of participants who remained housed after 3 months is 74%
- Annual percentage of participants who remained housed after 6 months is 0%
- Annual percentage of participants who remained housed after 9 months is 0%
- Annual percentage of participants who remained housed after 12 months is 0%
- Annual number of participants remaining housed after 12 months is 0
- Average length of program participation is 3 months
- Annual number of families receiving an MTW housing choice voucher and leaving the SBV program is 0

Benchmarks:

- Annual number of program participants will be 1,000 by June 30, 2018
- Annual percentage of participants who remained housed after 3 months will be 80% by June 30, 2018
- Annual percentage of participants who remained housed after 6 months will be 70% by June 30, 2018
- Annual percentage of participants who remained housed after 9 months will be 60% by June 30, 2018
- Annual percentage of participants who remained housed after 12 months will be 50% by June 30, 2018
- Annual number of participants remaining housed after 12 months will be 500 by June 30, 2018
- Average length of program participation will be 12 months by June 30, 2018

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
- Annual number of participants remaining 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 Voucher Program for the Homeless								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date	On Track to Reach Goal (Y or N)
Annual number of program participants	39					1,000	6/30/2018	
Percentage of program participants remaining housed 3 mo.	74%					80%	6/30/2018	
Percentage of program participants remaining housed 6 mo.	0%					70%	6/30/2018	
Percentage of program participants remaining housed 9 mo.	0%					60%	6/30/2018	
Percentage of program participants remaining housed 12 mo.	0%					50%	6/30/2018	
Annual number of participants remaining housed after 12 months	0					500	6/30/2018	
Average length of program participation	3 months					12 months	6/30/2018	
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. NEW PUBLIC HOUSING TRANSITION

SDHC is expecting to convert 113 units (112 state-assisted units and one manager’s unit) from the State-Aided Rental Housing Construction program to the public housing program during Fiscal



Year 2013. Participants in the state-aided program currently pay 25 percent of their monthly adjusted income toward their rent portion subject to a base rent minimum, while public housing participants pay 30 percent of their income with no base rent minimum.

SDHC is requesting to transition the state-aided program to the public housing program for three primary reasons:

1. The ongoing reduction of the state subsidy compromises the sustainability of the program;
2. The program is underfunded by the state for capital needs; and
3. Participation in the public housing program will provide the Federal subsidy needed to sustain the affordability of the units and fund necessary rehabilitation activities.

Tenants in the state-aided program will benefit from the conversion to public housing for these reasons.

SDHC is seeking authority to provide these 112 units with a transition period upon approval for public housing. For the residents experiencing a rent increase, this will be a conversionary matter of not more than two years, allowing these participants to pay between 25 and 30 percent of their monthly adjusted income toward their rent portion for an interim period before moving to 30 percent, as current public housing regulations dictate. This will benefit the participants by allowing them to experience rent portion increases in two smaller stages rather than moving from 25 to 30 percent upon program conversion.

The matrices below detail the predicted change to the calculated rent portion upon transition to the public housing program as well as the current status of tenants (based on May 2012 data):

State Site Conversion: Change in Tenant Rent		
Rent Calculated at 30% TTP	Number of Tenants	Percent of Total Occupied Units
Total Households:	80	100%
*29 Vacant Units, 3 HCV Assisted Units, and 1 Manager's Unit Not Reflected in the Total Number of Tenants. HCV Tenants Choosing Not to Convert to Public Housing Will Be Relocated.		
Households Experiencing a Rent Increase/No Change	Number of Tenants	Percent of Total Occupied Units
Difference of \$0 to \$50	33	41%
Difference of \$51 to \$100	20	25%
Difference of \$101 to \$150	12	15%
Difference of > \$150	3	4%
Total:	68	85%
Households Experiencing a Rent Decrease/No Change	Number of Tenants	Percent of Total Occupied Units
Difference of \$0 to -\$50	6	8%
Difference of -\$51 to -\$100	2	3%
Difference of -\$101 to -\$150	1	1%
Difference of > -\$150	3	4%
Total:	12	15%



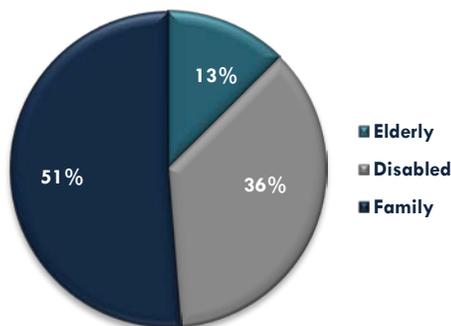
Current Percent of Income Paid Towards Rent		
Percent of Income	Number of Tenants	Percent of Total Tenants
25%	68	85%
<25%	0	0%
>25%	12	15%
Total:	80	100%

*29 Vacant Units, 3 HCV Assisted Units, and 1 Manager's Unit Not Reflected in the Total Number of Tenants.

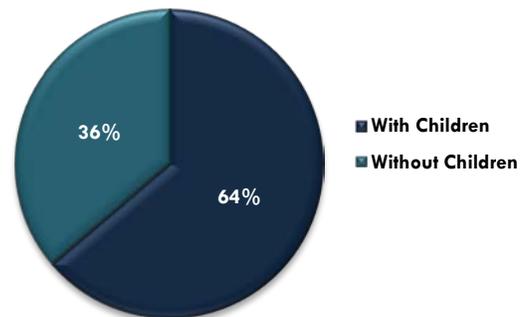
As delineated in the matrix, SDHC anticipates 15 percent of current residents will experience a rent decrease as a result of the transition to the public housing program. The remaining 85 percent of residents will benefit from the rent transition period where the impact will be temporarily mitigated.

The charts below illustrate the composition of households of current state sites tenants:

Household Composition Type



Households with Dependents



Relation to Statutory Objectives: Increase Housing Choices for low income families.

Anticipated Impact: SDHC anticipates this activity will benefit participants in the 112 units converting to public housing. Providing a transitional period upon conversion will increase housing choices for these families by extending the rent portion increase timeframes.

Baselines, Benchmarks, and Metrics:

Baselines:

- Number of families converted from the state-aided program to the public housing program is 0
- Number of converted families paying more than 25% but less than 30% of monthly adjusted income toward the rent portion is 0



- Number of converted families paying 30% of monthly adjusted income toward the rent portion

Benchmarks:

- Number of families converted from the state-aided program to public housing program will be 112 by June 30, 2013
- Number of converted families paying more than 25% but less than 30% of monthly adjusted income toward the rent portion will be 112 by June 30, 2013
- Number of converted families paying 30% of monthly adjusted income toward rent portion will be 112 by June 30, 2014

Metrics:

- Number of families converted from state-aided program to the public housing program
- Number of converted families paying more than 25% but less than 30% of monthly adjusted income toward the rent portion
- Number of converted families paying 30% of monthly adjusted income toward the rent portion

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:

New Public Housing Transition								
Metric	Baseline 2012	QTD (#)	QTD (%)	YTD (#)	YTD (%)	Benchmark	Anticipated Benchmark Reached Date*	On Track to Reach Goal (Y or N)
Number of families converted from the state-aided program to public housing program	0					112	June 30, 2013	
Number of converted families paying more than 25% but less than 30% of monthly adjusted income toward the rent portion	0					112	June 30, 2013	
Number of converted families paying 30% of monthly adjusted income toward the rent portion	0					112	June 30, 2014	

*The anticipated benchmark reach dates are contingent upon HUD approval of the transition to Public Housing. If adjusted, the change will be reported in the applicable MTW Annual Report.



Description of Authorization or Regulation Waived: MTW Agreement Attachment C, Section C(11) containing waivers of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 CFR 5.603, 5.611, 5.630, 5.634, and 960.255 and 966 Subpart A.

Impact Analysis and Hardship Policy: SDHC has determined through the impact analysis that a hardship policy is not necessary. This activity will have a benign effect on participants who convert from the state-aided program to the public housing program. If this activity was not proposed, the participants would move from a 25 percent rent burden to a 30 percent rent burden in one step. By implementing a transition period, it creates a beneficial situation for the participants, allowing them to pay a lower rent portion for a period of time before moving to the full 30 percent requirement.



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	Path to Success	Reduce cost and achieve greater cost effectiveness; encourage self-sufficiency	2012	To be implemented July 1, 2013	N/A	N/A
2	Biennial Reexamination Schedule	Reduce cost and achieve greater cost effectiveness	2012	Implemented July 1, 2012	N/A	N/A
3	Modify Full-Time Student Definition	Reduce cost and achieve greater cost effectiveness; encourage self-sufficiency	2012	Implemented December 1, 2011	N/A	N/A
4	Project-Based Subsidy for the Homeless	Reduce cost and achieve greater cost effectiveness; increase housing choices	2012	Implementation pending program development	N/A	N/A
5	Allow SDHC to charge lower rents for non-assisted units in SDHC-owned developments	Increase housing choices	2011	Implemented October 1, 2010	N/A	N/A
6	Authorize commitment of PBV to SDHC-owned units	Reduce cost and achieve greater cost effectiveness; increase housing choices	2011	Implemented July 1, 2010	N/A	N/A
7	Two year occupancy term for PBV tenants before eligible for a voucher	Reduce cost and achieve greater cost effectiveness	2011	Implemented July 1, 2010	N/A	N/A
8	Acquisition of additional affordable housing units in the City of San Diego	Increase housing choices	2011	Implemented July 1, 2010. SDHC would like to clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego.	N/A	N/A
9	Disregard Retirement Accounts	Reduce cost and achieve greater cost effectiveness	2011	Implemented August 1, 2010	N/A	N/A
10	Modify EIV Income Report Review Schedule	Reduce cost and achieve greater cost effectiveness	2011	Implemented August 1, 2010	N/A	N/A
11	Development of public housing units using a combination of funds	Increase housing choices	2011	SDHC may continue to develop additional public housing in FY 2013. This initiative was combined with the FY 2010 Public Housing Development activity. SDHC plans to limit public housing development to that associated with RHF funds.	N/A	N/A
12	Sponsor-Based Vouchers for the Homeless	Reduce cost and achieve greater cost effectiveness; increase housing choices	2011	Implemented September 1, 2011	N/A	N/A



13	Enhance FSS Program	Encourage self sufficiency; increase housing choices	2011	Implemented November 1, 2010	N/A	N/A
14	Broader Uses of Funds for IDAs	Encourage self sufficiency; increase housing choices	2011	Implemented January 1, 2011. Please note this has been moved to Section VII of the Plan and will no longer be included in this section.	N/A	N/A
15	Implement a revised inspection protocol	Reduce costs and achieve greater cost effectiveness	2010	Implemented June 1, 2010	N/A	N/A
16	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	N/A
17	Implement triennial income certifications for elderly and disabled clients	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	N/A
18	Choice Communities Components <ul style="list-style-type: none"> ▪ Eliminate 40% Affordability Cap ▪ Moving for Opportunity Program ▪ Revolving Security Deposit Loan fund ▪ Increase payment standards in low-poverty areas 	Increase housing choices	2010	<ul style="list-style-type: none"> ▪ Implemented January 1, 2010 ▪ Implemented January 1, 2010 ▪ Implemented January 1, 2010 ▪ Implemented June 1, 2010 	N/A	N/A
19	Standardize utility allowances by unit size	Reduce costs and achieve greater cost effectiveness	2010	Implemented April 1, 2010	N/A	N/A
20	Simplify income and asset verification systems to reduce administrative costs	Reduce costs and achieve greater cost effectiveness	2010	Implemented October 1, 2009	N/A	N/A
21	Adopt a local interim certification policy	Increase housing choices; encourage self-sufficiency	2010	Implemented July 1, 2011	N/A	N/A
22	Establish an HCV homeownership program	Increase housing choices; encourage self-sufficiency	2010	Implemented October 1, 2009	N/A	N/A
23	Expand the PBV program	Increase housing choices	2010	Implemented September 1, 2009	N/A	N/A
24	Undertake public housing development	Increase housing choices	2010	This activity was closed out in the FY 2011 MTW Report. Public Housing development will occur under the FY 2011 Public Housing Development initiative, activity number 11 in this chart.	N/A	N/A
25	Achievement Academy of the San Diego Housing Commission (formerly called the Economic Development Academy)	Encourage self-sufficiency	2009	Implemented October 1, 2010. No longer considered an initiative per MTW HUD. Now included in Section VII. Please note this has been moved to Section VII of the Plan and will no longer be included in this section.	N/A	N/A



SECTION VII – SOURCES AND USES OF FUNDING

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

Planned Sources and Uses of MTW Funds	
Planned Sources:	Projected Budget
Public Housing Rental Income	313,541
Public Housing Subsidy	59,916
Public Housing MTW Capital Funds	1,178,867
HCV Subsidy and Fees	184,729,396
Investment / Interest Income	34,388
Non-Rental Income	17,621
Reserves	13,605,941
Other:	0
Total Planned Sources:	199,939,670
Planned Uses:	Projected Budget
HCV Housing Assistance Payments	162,611,258
HCV Administration	16,911,035
Agency Managed Housing Operations	499,022
Privately Managed Housing Operations	0
Utility Payments	0
Public Housing Rehabilitation Expenses	70,513
Debt Service Repayment Expenses	0
Development Activities (1)	17,880,080
Resident Services Expenses	0
Protective Services Expenses	9,105
Local Housing Program Expenses	0
Other: MTW Choice Communities	10,000
Other: MTW Student Graduation Incentive (2)	25,000
Other: MTW Foreclosure Initiatives	50,000
Other: Work Readiness Services (3)	1,873,657
Total Planned Uses:	199,939,670
Comments	
(1) SDHC is actively pursuing favorable affordable housing transactions. More funds may be designated toward this effort if the opportunity arises. (2) A program providing a monetary incentive to family members graduating from post-secondary education. (3) Achievement Academy self-sufficiency uses.	
RHF Funds (Non-MTW)	
Sources	
RHF Funds Fiscal Year 2013	5,368,448
Uses	
Public Housing Redevelopment	5,368,448



- B. SDHC will not use any State or local funds for the MTW program.
- C. COCC – N/A
- 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 HCV program funds to implement the Moving to Work initiatives described in the Fiscal Year 2013 MTW Plan and will continue to do so in future Plans. SDHC may use public housing and/or voucher funds to acquire and rehabilitate public housing and affordable housing developments.

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

SDHC also used single-fund flexibility to conduct a variety of activities geared toward self-sufficiency. The SDHC Achievement Academy, formerly known as the Economic Development Academy, offers a broad range of one-on-one services and workshops geared toward workforce preparation, financial literacy, and homeownership education.

In direct alignment with the Path to Success initiative, the SDHC Achievement Academy provides an environment to motivate and encourage work-able participants on their journey to becoming more self-sufficient. Service demand is scheduled to increase due to the new minimum rent requirements, and through the SDHC Achievement Academy, participants will have the opportunity to utilize bundled services to increase employment skills, gain financial education, and have access to benefit supports to increase their net worth. To leverage resources and maximize capacity, partnerships were established to provide additional services. Onsite partners include: Manpower, a highly acclaimed national staffing firm; JobWorks, operator of the satellite One-Stop Career Center; Springboard Nonprofit Consumer Credit Counseling agency; and VITA Tax Preparation Site. A schedule of comprehensive work readiness and financial skills development workshops are established and conducted. FSS Program Coordinators work with partner staff to provide a coordinated approach, aligning direct services, and reducing duplicated efforts to increase efficiencies. Acting as participant ambassadors, a referral system was developed to close the gap between program requirements and partner services. Data will be provided in the MTW Annual Report.

Included in this MTW Plan is an FSS Escrow Reinvention initiative in which SDHC proposes to make alterations to the FSS program. Approval of this activity will bring many exciting changes to the SDHC Achievement Academy. Please see the initiative in Section V, Proposed MTW Activities, for additional detail.

Employment/Workforce Development

Group and one-on-one employment training and coaching are provided. Participants plan and establish career goals, receive information and referrals to onsite and community based trainings, and access support services. The Manpower Job Developer identifies job leads, makes connections with employers of in-demand occupations, and coordinates employment services with partner



organizations. Participants receive access to the online Training Development Center to increase specialized skills training in selected fields of interest. JobWorks offers labor market information, assessments, career development, job placement assistance, and job search/retention skills. In addition, on-site work readiness workshops are offered.

Employment Training Programs

The SDHC Achievement Academy continues to focus on the need to provide additional employment and vocational training opportunities to increase the number of participants who obtain employment and increase income. Programs are administered by the SDHC Achievement Academy and by off-site partners for underemployed and unemployed participants interested in acquiring new skills and career advancement. Training programs currently provided are listed below:

- **Dress for Success**, a professional development program for women, provides coaching to build confidence, increase career skills, and job search resources education.
- **Bridge to Employment in the Healthcare Industry** connects TANF recipients and other low-income individuals with navigating into training and employment within the healthcare system.
- **Comprehensive Training Systems (CTS)** provides high level quality training and job placement in a diverse range of skill areas.
- **Certified Sherwin-Williams Painter Training**, part of the nation-wide “Home Work” program, and an instructional, on the job painter training course, allows participants to gain skills and earn an Environmental Protection Agency (EPA) certificate upon program completion.
- **Small Business Development**, the Business Initiatives Strategies (BIS) training program educates participants on starting and expanding small businesses through the creation of a solid business plan.
- **Building Performance Institute (BPI) Training** trains participants to conduct comprehensive, whole-house energy-efficient assessments.

To increase job preparation and job placement outcomes, the SDHC Achievement Academy continues to identify and expand linkages to critical community resources and trainings related to workforce development to connect participants with avenues to access employment and skill building opportunities. In collaboration with other local organizations, SDHC will continue seek out new and innovative workforce development opportunities.

Financial Counseling

Group and one-on-one financial education and coaching are provided. Participants receive assistance with establishing financial goals, creating a budget and savings plan, and the concept of net worth is introduced. Springboard provides a Certified Financial Counselor who specializes in one-on-one assistance to enhance financial coaching services. Credit reports (initial, six, and twelve months) are pulled and participants receive assistance establishing credit and debt management plans, contacting credit bureaus to dispute errors, and increasing credit scores. Participants also receive assistance with improving cash management skills to ultimately increase net worth.



Income Supports

Benefits Screening

One-on-one benefits consultations are currently provided to screen participants for food stamps (CalFresh), CalWorks, Women Infants and Children (WIC), CA Healthy Families, Child Care Assistance, Head Start, Home Energy Assistance Program (HEAP), Lifeline, Medical, and Supplemental Nutrition Assistance Program (SNAP). Various touch points were established to ensure all eligible participants are assisted with the application process.

Tax Preparation

As a part of the Earned Income Tax Credit Coalition led by the United Way, the SDHC Achievement Academy is an established Volunteer Income Tax Association (VITA) volunteer site and provides free tax preparation services during the tax season. Participants have the opportunity to receive electronically-deposited tax refunds via a Visa prepaid debt card from US Bank. The AccelaPay Card, operates as a normal debit card and includes no set up or ongoing maintenance fees. This complimentary product will assist participants who do not have bank accounts with decreasing turn-around time to access refund payments more timely.

UPDATE ON REPLACEMENT HOUSING FACTOR (RHF) FUNDS

It is anticipated RHF funds will be received during Fiscal Year 2013. SDHC plans to commit the remainder of the first five-year increment to convert 113 units (112 state-assisted units and one manager's unit) of SDHC-owned properties to public housing, either directly or for the repayment of bank loans used to finance development improvements and to renovate those properties.

The commitment of RHF funds for these properties would leave approximately five years of RHF, the second increment, which SDHC would then use for additional public housing development or acquisition. If SDHC receives RHF of \$1.5 million annually or \$7.5 million over five years and expends \$200,000 per unit for the acquisitions, SDHC could add approximately 37 replacement units, bringing SDHC's total number of public housing units to 225 units. SDHC does not foresee adding public housing units beyond the number that can be funded by using the remaining RHF funds in this manner.



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

Board Resolution and Certification of Compliance

SAN DIEGO HOUSING COMMISSION

RESOLUTION NO. 1549

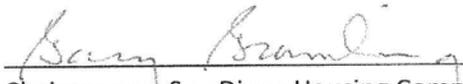
ADOPTED ON MARCH 16, 2012

WHEREAS, on March 16, 2012 the San Diego Housing Commission Board of Commissioners approved the submission of the proposed Annual Moving to Work Plan for July 1, 2012 through June 30, 2013 to HUD.

WHEREAS, on March 16, 2012 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 Replacement Housing Factor Funds for Development.

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 16, 2012.

Vote: Yeas – 6
 Nays – 0
 Absent – 1



Chairperson, San Diego Housing Commission

ATTEST:
By: 

Deputy Secretary



Passed and adopted by the San Diego Housing Commission on March 16, 2012 by the following vote:

	Yeas	Nays	Excused	Not Present
Gary Gramling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Roberta Spoon	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sam Guillen	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jim Waring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Allen Sims	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Khadija Basir	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ben Moraga	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

AUTHENTICATED BY:

Gary Gramling

Chair of the San Diego Housing Commission

Richard C. Gentry

President & Chief Executive Officer of the San Diego Housing Commission

I HEREBY CERTIFY that the above and foregoing is a full, true and correct copy of RESOLUTION NO. 1549 passed and adopted by the San Diego Housing Commission on March 16, 2012.

By:

Pari Ryan

Deputy Secretary of the San Diego Housing Commission



OMB Approval Number 2577-0216 (expires 12/31/2011)

Annual Moving to Work Plan Certifications of Compliance

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2013 hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.



16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

San Diego Housing Commission
PHA Name

CA063
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment

Richard C. Gentry
Name of Authorized Official

President + CEO
Title

[Signature]
Signature

3-21-12
Date



APPENDIX B

Public Hearing Notice and Evidence of Community and Resident Participation

The San Diego Housing Commission (SDHC) formally solicited public comment on the Fiscal Year 2013 Annual Plan Draft in order to incorporate the ideas of participants, community advocates, and interested citizens into the proposed plan as well as answer questions pertaining to Moving to Work subject matter. A formal public hearing was held on February 21, 2012 at the SDHC corporate office for the purposes of educating the public and receiving comments. A public notice was circulated in four local publications (San Diego Daily Transcript, Union Tribune, Voice & Viewpoint, and La Prensa) 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 participants. The 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.

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

- ✓ Proof of Publication
- ✓ Public Hearing Sign-In Sheet
- ✓ Public Comment Matrix



San Diego Daily Transcript

CERTIFICATE OF PUBLICATION

Ann Kern
San Diego Housing Commission
Real Estate Dept.
1122 Broadway
Suite 300
San Diego CA 92101

IN THE MATTER OF MTW Plan/S8 Waiting List

CASE NO.

Date of Public Notice: January 27, 2012

PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION'S MOVING TO WORK FISCAL YEAR 2013 PLAN, AMENDMENT TO THE MOVING TO WORK AGREEMENT, AND WAITING LIST PREFERENCES

PUBLIC NOTICE: The San Diego Housing Commission (SDHC) is soliciting public comments on the SDHC's Moving to Work (MTW) fiscal year 2013 Plan, an amendment to the Moving to Work Agreement, and waiting list preferences for the Section 8 Rental Assistance Program. The proposed plan and amendments are available for review on the SDHC website: www.sdhc.org beginning February 3, 2012. Comments must be submitted by March 5, 2012 to be considered by staff and decision-making authorities in their final review of the proposed plan and amendments. Please send your written comments to: Jennifer Keily, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101 or e-mail your comments to jennifek@sdhc.org

SUBJECT:

As an eligible MTW agency, the SDHC is required to develop an MTW Annual Plan outlining and identifying policies the Housing Commission plans to change as well as any planned new programs being implemented during the coming year. SDHC is also proposing an amendment to their Moving to Work Agreement and a change to the waiting list preferences for the Section 8 Rental Assistance Program. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2013 (July 1, 2012 through June 30, 2013). Examples of the program and policy changes being considered include: A housing program designed for homeless veterans, changes to the VASH voucher program administration, and further rental assistance calculation streamlining. The proposed amendment to the MTW Agreement will provide further funding flexibility. The waiting list preference proposal will update two of the numbered categories related to the local preferences ranked one and three. The proposals are available for review and comment on SDHC's website at www.sdhc.org.

PUBLIC HEARING

SDHC will hold a Public Hearing for the proposals on Tuesday, February 21, 2012 at 9:30am at the San Diego Housing Commission at 1122 Broadway, San Diego, CA 92101.

Pub Jan 26, Feb 2-00095268

I, Clair F. Wilson, am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the above entitled matter. I am the principal clerk of the San Diego Daily Transcript, a newspaper of general circulation, printed and published daily, except on 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

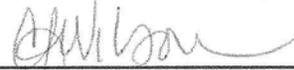
Public Hearing

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:

January 26, February 2

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

Dated at San Diego, California this February 2, 2012


Signature



Union Tribune



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

AFFIDAVIT OF PUBLICATION

SAN DIEGO HOUSING COMMISSION
 1122 BROADWAY #300
 ATTN:ACCOUNTS PAYABLE
 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:

Jan 27, 2012, Feb 3, 2012

Chief Clerk for the Publisher

2-3-2012

Date

Affidavit of Publication of

Legal Advertisement
 Ad # 0010596155
 ORDERED BY: RENAE RODAS

PUBLIC NOTICE

The San Diego Housing Commission (SDHC) is soliciting public comments on the SDHC's Moving to Work (MTW) fiscal year 2013 Plan, an amendment to the Moving to Work Agreement, and waiting list preferences for the Section 8 Rental Assistance Program. The proposed plan and amendments are available for review on the SDHC website: www.sdhc.org beginning February 3, 2012. Comments must be submitted by March 5, 2012 to be considered by staff and decision-making authorities in their final review of the proposed plan and amendments. Please send your written comments to: Jennifer Kelly, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101 or e-mail your comments to jk@sdhc.org.

SUBJECT: As an eligible MTW agency, the SDHC is required to develop an MTW Annual Plan outlining and identifying policies the Housing Commission plans to change as well as any planned new programs being implemented during the coming year. SDHC is also proposing an amendment to their Moving to Work Agreement and a change to the waiting list preferences for the Section 8 Rental Assistance Program. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2012 (July 1, 2012 through June 30, 2013). Examples of the program and policy changes being considered include: a housing program designed for homeless veterans; changes to the VASH Voucher program administration; and other rental assistance calculation streamlining. The proposed amendment to the MTW Agreement will provide further funding flexibility. The waiting list preference proposal will update two of the numbered categories related to

the local preferences ranked one and three. The proposals are available for review and comment on SDHC's website at www.sdhc.org.

PUBLIC HEARING: SDHC will hold a Public Hearing for the proposals on Tuesday, February 21, 2012 at 9:30am at the San Diego Housing Commission at 1122 Broadway, San Diego, CA 92101.

RECEIVED
 FEB 08 2012
 FISCAL SERVICES



Voice & Viewpoint

B2 • Thursday January 26, 2012 • *The San Diego Voice & Viewpoint*

LEGAL NOTICES

**PUBLIC NOTICE
OF THE
SAN DIEGO
HOUSING
COMMISSION'S
MOVING TO
WORK
FISCAL YEAR
2013 PLAN,
AMENDMENT
TO THE
MOVING TO
WORK
AGREEMENT,
AND WAITING
LIST
PREFERENCES**

PUBLIC NOTICE: The San Diego Housing Commission (SDHC) is soliciting public comments on the SDHC's Moving to Work (MTW) fiscal year 2013 Plan, an amendment to the Moving to Work Agreement, and waiting list preferences for the Section 8 Rental Assistance Program. The proposed plan and amendments are available for review on the SDHC website: www.sdhc.org beginning February 3, 2012. Comments must be submitted by March 5, 2012 to be considered by staff and decision-making authorities in their final review of the proposed plan and amendments. Please send your written comments to: Jennifer Kelly, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101 or e-mail your comments to jennifek@sdhc.org.

SUBJECT:

As an eligible MTW agency, the SDHC is required to develop an MTW Annual Plan outlining and identifying policies the Housing Commission plans to change as well as any planned new programs being implemented during the coming year. SDHC is also proposing an amendment to their Moving to Work Agreement and a change to the waiting list preferences for the Section 8 Rental Assistance Program. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2013 (July 1, 2012 through June 30, 2013). Examples of the program and policy changes being considered include: A housing program designed for homeless veterans, changes to the VASH voucher program administration, and further rental assistance calculation streamlining. The proposed amendment to the MTW Agreement will provide further funding flexibility. The waiting list preference proposal will update two of the numbered categories related to the local preferences ranked one and three. The proposals are available for review and comment on SDHC's website at www.sdhc.org.

PUBLIC HEARING

SDHC will hold a Public Hearing for the proposals on Tuesday, February 21, 2012 at 9:30am at the San Diego Housing Commission at 1122 Broadway, San Diego, CA 92101.

1/26, 2/2



La Prensa

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:

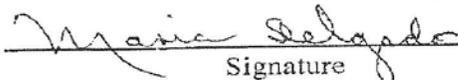
January 27 and February 3

all in the year 2011.

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

Dated at San Diego

California, this 3rd day of February, 2012.


Signature

This space is for the County Clerk's Filing Stamp

PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION'S MOVING TO WORK FISCAL YEAR 2013 PLAN, AMENDMENT TO THE MOVING TO WORK AGREEMENT, AND WAITING LIST PREFERENCES

PUBLIC NOTICE: The San Diego Housing Commission (SDHC) is soliciting public comments on the SDHC's Moving to Work (MTW) fiscal year 2013 Plan, an amendment to the Moving to Work Agreement, and waiting list preferences for the Section 8 Rental Assistance Program. The proposed plan and amendments are available for review on the SDHC website: www.sdhc.org beginning February 3, 2012. Comments must be submitted by March 5, 2012 to be considered by staff and decision-making authorities in their final review of the proposed plan and amendments. Please send your written comments to: Jennifer Kelly, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101 or e-mail your comments to jennifek@sdhc.org.

SUBJECT:

As an eligible MTW agency, the SDHC is required to develop an MTW Annual Plan outlining and identifying policies the Housing Commission plans to change as well as any planned new programs being implemented during the coming year. SDHC is also proposing an amendment to their Moving to Work Agreement and a change to the waiting list preferences for the Section 8 Rental Assistance Program. SDHC is soliciting public comment on the program and policy changes being considered for Fiscal Year 2013 (July 1, 2012 through June 30, 2013). Examples of the program and policy changes being considered include: A housing program designed for homeless veterans, changes to the VASH voucher program administration, and further rental assistance calculation streamlining. The proposed amendment to the MTW Agreement will provide further funding flexibility. The waiting list preference proposal will update two of the numbered categories related to the local preferences ranked one and three. The proposals are available for review and comment on SDHC's website at www.sdhc.org.

PUBLIC HEARING

SDHC will hold a Public Hearing for the proposals on Tuesday, February 21, 2012 at 9:30am at the San Diego Housing Commission at 1122 Broadway, San Diego, CA 92101.

Published: 1/27, 2/3/2012
La Prensa San Diego



MTW Public Hearing
 February 21, 2012
 MTW FY 2013 Plan, Agreement Amendment, Section 8 Waiting List Changes

Printed Name	Signature	Organization	Email Address
HARRY NORTON	<i>HR Norton</i>		
Ingrid Dickson	<i>Ingrid Dickson</i>		
<i>Regina</i>	<i>Regina Sorpio</i>		<i>mvzicatcat@yahoo.de</i>
Jackie Harris	<i>Jackie Harris</i>	SDHC	<i>jackieharris@sdhc.org</i>
Angie Robinson	<i>Angie Robinson</i>	SDHC	
James Jones	<i>James Jones</i>		
Mark Quonan	<i>Mark Quonan</i>	SDHC	<i>markquonan@gmail.com</i>
Jessica Adams	<i>Jessica Adams</i>	SDHC	<i>jessica@sdhc.org</i>
Marcus Christopher	<i>Marcus Christopher</i>	SDHC	<i>marcus@sdhc.org</i>
Jennifer Kelly	<i>Jennifer Kelly</i>	SDHC	<i>jennifer@sdhc.org</i>



Group/Agency	Questions/Comments Received	SDHC Responses
HCV Participant	What is the benefit of the Public Housing flat rent over the income based rent?	The flat rent allows higher income families to pay less towards rent than if using an income based rent calculation. Eliminating the flat rent allows SDHC to administer the Public Housing program more like the Housing Choice Voucher program. Also, it equalizes the percentage of adjusted monthly income paid towards rent among all program participants so one family does not benefit programmatically over another family.
HCV Participant	Concerning the Transitional Housing Partnership with Veteran's Village of San Diego (VVSD), you mentioned the average length of time the veterans are expected to remain in transitional housing is 6 months. How are you able to project this timeframe?	VVSD provided data and feedback to SDHC which supported 6 months as the average length of time veterans typically remain in this type of housing.
HCV Participant	What is the expected amount of the subsidy for the VVSD transitional housing program?	The amount of subsidy is currently unknown since it is dependent upon many factors such as unit type, average client income, and funding levels which are not yet indentified.
HCV Participant	For the Transitional Supportive Project-Based Vouchers for the Homeless, how did you choose your partners?	Partners were selected via a competitive process through a solicitation in a Request for Proposal (RFP).
HCV Participant	You mentioned the project-based vouchers will be used in the World Trade Center building. Where is the World Trade Center in San Diego?	The World Trade Center in San Diego is located at 1250 6th Avenue in San Diego near the cross street of Ash.
HCV Participant	Are the project-based vouchers for the Homeless Program only available to single homeless persons?	Yes. At this time, our target population is single homeless persons.
HCV Participant	For the PBV developments, isn't there already a waitlist for the project-based vouchers? It seems like you can use the list to fill any vacancies quickly.	Yes, but the average length of time it takes to fill a vacancy averages 45 to 60 days. Depending on the development, a property manager may prescreen and select tenants in advance while other property managers may choose not to utilize this tenant selection process. The proposed initiative will ensure PBV units are not vacant while the eligibility and lease-up phases are in process.
HCV Participant	Why aren't all potential PBV tenants pre-screened by SDHC? Wouldn't it save time?	The eligibility process is multifaceted. The property managers pull potential tenants from the waitlist for the suitability process. Once a suitable family is selected, SDHC conducts an eligibility determination according to HUD's criteria. If SDHC determines the family is eligible for project-based assistance, the lease-up process begins. SDHC found pre-screening for the eligibility process related to HUD's regulations is of little use since family's situations and circumstances change often.



Group/Agency	Questions/Comments Received	SDHC Responses
HCV Participant	According to the 2 Year Occupancy Requirement for PBV Residents initiative, a family with a project-based voucher is able to receive a tenant-based voucher after 24 months. Isn't there already a waitlist for tenant-based vouchers?	There are waitlists for both tenant-based and project-based vouchers, both of which are lengthy. The average time spent on each waitlist is 7 to 10 years. By the time a PBV tenant is eligible for a tenant-based voucher, the family has generally already spent substantial time on a waitlist.
HCV Participant	You stated a barrier to the VASH program is the garnishments imposed on a newly accessed income source by the veteran's on the program. Social Security benefits cannot be garnished.	VASH participants have many different income types subject to garnishments such as employment wages, SSI, and Veteran's Benefits.
HCV Participant	For the Family Self Sufficiency Program Reinvention: Are only families able to participate in the FSS program?	The FSS program is open to all rental assistance participants whether single or a family.
HCV Participant	You mentioned upon the voluntary surrender of the voucher as related to the FSS Reinvention, an additional deposit will be made into the family's escrow account. What happens if the family surrenders the voucher and then loses employment? The voucher is like a safety net which families may not be willing to give up.	In this case, we would not issue another voucher. However, as a result in participating in the FSS Program and attending Achievement Academy classes and workshops, the family should have received the tools necessary to survive these types of events. For example, the family should have built significant savings accounts and increased all household income as a result of program participation.
HCV Participant	When a family utilizes the portability function of the program, which Public Housing Authority (PHA) pays for the voucher?	It depends on whether the receiving PHA absorbs or administers the voucher. If the receiving PHA absorbs the voucher, the receiving PHA pays the rental assistance for the family. If the receiving PHA administers the voucher, the receiving PHA bills the initial PHA every month in order to pay the landlord. Whether or not the PHA absorbs or administers the voucher depends on voucher availability and funding levels. A PHA can opt to both administer and absorb vouchers.



APPENDIX C

AFFORDABLE HOUSING DEVELOPMENT: THE 2011 AND 2012 EXPERIENCE

During Fiscal Years 2011 and 2012, the San Diego Housing Commission (SDHC) participated in the development of 1,109 units of additional affordable housing within the City of San Diego. Part of SDHC's contribution included purchasing three properties containing affordable housing.

Development	Units
Mariners Village	171
The Courtyard	37
Hotel Sandford	129
Total	337

SDHC purchased Mariners Village, an existing market rate apartment community, and recorded a restrictive covenant thereby restricting rents to no higher than 80% AMI. The Courtyard was a recently constructed community originally intended as condominiums. The units were never occupied due to bank foreclosure. The Hotel Sanford is a historical building built at the turn of the century and occupied by seniors. SDHC purchased the Sanford to preserve the units which otherwise would have become market rate. SDHC also provided funding (along with the downtown Redevelopment Agency) to perform necessary rehabilitation of the units, thus marking the first joint effort between SDHC and the downtown Redevelopment Agency to preserve and create quality affordable housing.

SDHC also created public/private ventures with affordable housing developers, yielding 404 affordable housing units in six separate projects. The ventures provided gap financing to developers. In return, SDHC became the owner of the fee simple interest in the land and secured an option to purchase the affordable housing improvements in 15 years. Of the six projects, three have been completed and three are presently under construction.

Development	Units
Riverwalk Apartments	49
Arbor Village Apartments	111
Vista Grande Apartments	48
Estrella de Mercado	91
Mission Apartments	84
Terramar Apartments	21
Total	404

In addition to the SDHC acquisitions and public/private partnerships, SDHC also provided loans and bond financing to four developments.



Development	Units
15 th & Commercial	64
City View Apartments	31
Connections Housing	75
Sorrento Tower Apartments	198
Total	368

In December 2011, construction was completed at 15th & Commercial, a new 64-unit, 150-bed facility offering a licensed child care facility, long-term transitional housing, and permanent affordable housing. Over thirteen funding sources were utilized to bring this project to fruition, including \$3.5 million from the SDHC.

City View was a partially-constructed and foreclosed condominium project in North Park. Project construction had stopped after completion of a two-level parking structure, and a portion of the first story (of five stories). SDHC provided a loan and bond financing allowing the foreclosed property to be acquired by an affordable housing developer who is completing the construction and creating 31 units of affordable rental housing.

SDHC provided \$2,000,000 (as part of a total estimated \$34,519,000 financing) to convert a city-owned building into a one-stop multi-service center for the homeless, including seventy-three units of permanent supportive rental housing for very-low income residents and 150 beds of interim housing for the homeless. The residents will have one-stop convenience, integrated care and access to referrals for additional assistance. Amenities will include access to a full service community health clinic, dining facility, case management, mail service, phones, showers, and a variety of on-site service providers for employment, benefits, mental health and substance abuse counseling.

In April 2011, \$14.5 million in multifamily housing revenue bonds were issued for the rehabilitation of Sorrento Towers, an existing 198-unit senior development. The bonds will preserve the affordability of this development for an additional 55 years and provide \$5,000,000 for needed renovations.

In summary, during Fiscal Years 2011 and 2012 SDHC invested over \$90 million which provide a variety of permanent and transitional affordable housing to San Diego's very-low, low, and moderate income households.