



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Ms. Katherine Harasz  
Executive Director  
Santa Clara County Housing Authority  
(Housing Authorities of the County of Santa Clara & the City of San Jose)  
505 West Julian St.  
San Jose, CA 95110

JUN 28 2018

Subject: Santa Clara County Housing Authority (Housing Authorities of the County of Santa Clara & the City of San Jose) FY 2019 Annual MTW Plan Approval

Dear Ms. Harasz:

The Department of Housing and Urban Development (HUD) has reviewed the Santa Clara County Housing Authority's (Housing Authorities of the County of Santa Clara & the City of San Jose) (SCCHA) FY 2019 Annual Moving to Work (MTW) Plan, which was initially submitted on April 4, 2018, and resubmitted per HUD's comments on June 12, 2018. I am writing to inform you that the Plan, as submitted on June 12, 2018, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local-nontraditional activities in compliance with PIH 2011-45. In providing assistance to families under programs covered by this Plan, SCCHA must comply with the rules, standards, and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at SCCHA's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. Please contact Philip Sung, your MTW Coordinator, at (202) 402-2892 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marianne Nazzaro", written over a horizontal line.

Marianne Nazzaro  
MTW Program Director  
Office of Public Housing Investments

cc: Gerard Windt, Director, HUD San Francisco Field Office



## **Moving to Work (MTW) 2019 Annual Plan**

**Housing Authorities of the County of Santa Clara & City of San José**

Submitted April 4, 2018 | Revised June 12, 2018

# Moving to Work FY2019 Annual Plan

## SANTA CLARA COUNTY HOUSING AUTHORITY (SCCHA)

(Housing Authorities of the County of Santa Clara & The City of San José)

---

*SCCHA's mission is to provide and inspire affordable housing solutions to enable low-income people in Santa Clara County to achieve financial stability and self-reliance.*

### Board of Commissioners

Jennifer Loving, Chair

Denis O'Neal, Vice-Chair

Adrienne Lawton

Bill Anderson

Elizabeth Gardner

Kathy Espinoza-Howard

Lionel Lorie

### Executive Management Team

Katherine Harasz, Executive Director

Sharon Jones, Deputy Executive Director

Aleli Sangalang, Director of Housing

Bakulesh Patel, Director of Finance/Chief Financial Officer

Russell Brunson, Director of Administrative Services

## Table of Contents

I.	Introduction .....	1
II.	General SCCHA Operating Information .....	7
III.	Proposed MTW Activities (HUD Approval Requested) .....	13
IV.	Approved MTW Activities (HUD Approval Previously Granted) .....	25
	Implemented Activities.....	24
	Activities Not Yet Implemented.....	33
	Activities on Hold.....	35
	Closed Out Activities.....	37
V.	MTW Sources And Uses of Funds .....	40
VI.	Administrative.....	44
	Appendix One: Resolution No.18-02 .....	45
	Appendix Two: Capital Improvement Program Statements .....	52

## I. Introduction

### Purpose of this Plan

In 1967, the Santa Clara County Board of Supervisors established the Santa Clara County Housing Authority of the County of Santa Clara (SCCHA). SCCHA has an agreement with the City of San José to administer and manage the Housing Authority of the City of San José (HACSJ)'s Housing Choice Voucher program. This MTW Plan presents a consolidated strategy to be implemented for both the County and City programs.

In 2008, SCCHA entered into a 10-year agreement (which has been extended until the conclusion of Fiscal Year 2028) with the Department of Housing and Urban Development (HUD) to become a Moving to Work (MTW) agency. This MTW Annual Plan illustrates how SCCHA proposes to carry out the MTW program in Fiscal Year 2019 (FY2019) from July 1, 2018 through June 30, 2019. The MTW Plan is an annual requirement by HUD and systematically describes how each activity advances SCCHA's vision and goals within the framework of the MTW charter.

### What is MTW?

Established by Congress in 1996, MTW is a Federal demonstration program that links broad Federal goals with locally-designed initiatives. MTW encourages select housing authorities to propose and, upon HUD approval, implement innovative changes to the way affordable housing programs are administered in order to meet at least one of the following three broad Federal goals:

1. Decrease administrative costs and increase cost effectiveness in housing program operations;
2. Promote participants' economic self-sufficiency, and
3. Expand participants' housing choices.

MTW requires SCCHA to strive for these goals while ensuring that the Agency continues to serve substantially the same mix of tenants (in terms of income level and family size) and at least as many households as the Agency had before its MTW status.

### SCCHA's Vision and Goals

In FY2014, SCCHA developed a five-year Strategic Plan to guide the Agency's direction over the long range. The Strategic Plan affirmed SCCHA's mission to provide and inspire affordable housing solutions that enable low-income people in Santa Clara County to achieve financial stability and self-reliance, identified the Agency's core values, and established SCCHA's short-term and long-term goals built upon MTW objectives.

Using the Strategic Plan as a compass, SCCHA is pursuing strategies within FY2019 and beyond that will set the foundation for the Agency to fulfill its MTW and non-MTW long-term goals.

## **SCCHA's Short-Term Goals and Proposed MTW Activities for Fiscal Year 2019**

Beginning in late Calendar Year (CY) 2017, SCCHA began releasing vouchers to qualified Housing Choice Voucher (HCV) waiting list applicants. SCCHA has also begun the planning process to re-open the HCV waiting list. Currently there are approximately 5,000 applicants remaining on the HCV waiting list. SCCHA projects to re-open the waiting list in late FY2019 or early FY2020. Vacancy rates remain very low in Santa Clara County, so SCCHA will closely monitor housing success rates for searching voucher holders and will provide housing search assistance if needed.

In mid-FY2018 SCCHA made available 258 Project Based Vouchers (PBVs) for development, in concert with the County of Santa Clara's voter-approved Measure A, which makes nearly \$1 billion in funding available for the development of affordable housing. These PBVs were included in a joint Notice of Funding Availability with the County, allowing developers to apply for both housing resources through one application. SCCHA will award the remaining PBVs to those developers who are awarded Measure A funds using an MTW activity that allows the Agency to select PBVs through a streamlined competitive selection method. SCCHA anticipates awarding the balance of the vouchers in FY2018, with construction to finish on those projects in FY2019 and FY2020.

SCCHA's Human Resources Department and Training and Outreach team continue to facilitate internal trainings focused on professional development (i.e. communication skills, accepting change, project management, etc.) and how to effectively administer the Section 8 program in compliance with HUD regulations. The team presents monthly Tenant Housing Search Workshops and Section 8 Owner Information Sessions to continually communicate essential program information to major stakeholders. Further, SCCHA's Compliance Team, created in April 2015, consistently and effectively monitors and evaluates the agency's federal programs, ensuring staff and program participant compliance with applicable program rules and regulations.

SCCHA's affordable housing Development team continues construction on two projects owned by SCCHA affiliates, the Park Avenue Senior Apartments and the Laurel Grove Family Apartments. The two adjacent 100%-PBV properties were purchased with MTW funds and, once complete, will provide respectively 99 units of affordable senior housing and 81 units of affordable family housing in a transit and amenity rich neighborhood of San Jose. Completion of the Laurel Grove Family Apartments is expected in late summer 2018 and completion of the Park Avenue Senior Apartments is expected in early 2020.

In addition to this construction activity, SCCHA has recently purchased or entered into purchase agreements for new development opportunities. Specifically, SCCHA utilized \$30.459 million in MTW funds to purchase 6.47 acres of unimproved land in downtown San Jose. While there are no current plans to develop the site, SCCHA is exploring ways to develop the property for future agency needs.

In late FY 2018, SCCHA acquired 2.3 acres of land midtown San Jose, utilizing \$12 million in MTW funds. Once acquired, SCCHA will develop the property into two distinct projects. The first is Alvarado Park Senior Housing that will include 89 affordable units targeting seniors. The second is Bellarmino Place Family Housing comprised of 115 affordable units for working families. SCCHA will commence predevelopment activities and hopes to break ground in late CY2019.

As will be reported in the FY 2018 MTW Report, SCCHA purchased the Buena Vista Mobile Home Park in Palo Alto, CA in September 2017. Day to day control of the site is with the ground lease tenant, Caritas Acquisitions IV, a non-profit entity of Caritas Corporation (Caritas). Caritas has surveyed the households and stabilized the Park. Throughout the next year, SCCHA will commence predevelopment activities to fully renovate the park. These activities could include a predevelopment loan of additional MTW funds for eligible project costs.

SCCHA's Information Technology and Facilities Department is striving to improve the agency's efficiency, and to meet staff's physical and technological needs. In FY2019, the Department will be introducing a new mobile application for applicants and current tenants that will facilitate information requests, submission of documents, and communications with Housing Authority staff. The Department is also building an internal Agency-wide intranet to improve staff collaboration and communication.

IT staff are also working to improve the services offered to Section 8 owners through SCCHA's "Owner Portal" website. The Owner Portal is accessible from the SCCHA homepage and is intended to provide owners with the ability to retrieve online information regarding their rental assistance payments, 1099 tax forms, tenants, and assigned specialists, and to be able to submit forms electronically. A pilot implementation for using electronic signatures for Housing Assistance Payments contracts has been completed. Electronic signatures will significantly reduce the time needed to process contracts and issue initial HAP payment to owners.

Lastly, a major priority for SCCHA is to continue to ensure that the Housing Choice Voucher (HCV) program continues to operate in an effective way. SCCHA is re-proposing one activity and proposing four new activities that focus on cost-effectiveness of program administration and economic self-sufficiency for low-income families.

The following activities are proposed in Section III of this MTW Plan:

- *Re-Proposed Activity 2017-3: Expand Landlord Initiatives: Bonus Payment.* This activity was created as a means to encourage owners to rent their vacant units to HCV voucher holders. SCCHA is re-proposing this activity to include bonus payments for new owners who agree to rent to HCV voucher holders.
- *Proposed Activity 2019-1: Graduation Bonus.* This activity will modify the regulation that the HAP contract automatically terminates 180 days after the last HAP payment to include families whose HAP amount is less than \$100 per month, shorten the time period before automatic termination to 60 days, and provide a graduation bonus payment to affected

families. The graduation bonus paid by this activity is intended to ease the transition of formerly-assisted families into the unsubsidized housing market.

- *Proposed Activity 2019-2: Family Self-Sufficiency Program (FSS) – Waive Contract of Participation Requirements.* This activity will waive the requirement that a family enrolling in FSS must have an interim or annual reexamination conducted within 120 days of the Contract of Participation (CoP) effective date. In addition, this activity will modify FSS CoP requirements to allow families to be classified as a “successful FSS completion” if at least one adult family member completes the requirement of suitable employment and the goals of their Individual Training and Services Plan.
- *Proposed Activity 2019-3: Waiving the Requirement that a PHA Re-determine Rent Reasonableness for Manufactured Home Spaces Annually.* SCCHA proposes the elimination of the HUD requirement that a PHA must annually re-determine the reasonable rent for a manufactured home space.
- *Proposed Activity 2019-4: Streamline the Lease-Up Process.* SCCHA proposes to alleviate the delays associated with the processing and completion of the lease-up process. Specifically, SCCHA proposes waiving the required use of standard form HUD-52517 and the HUD-required language that must be included in Section 8 leases.

### SCCHA’s Long-Term Vision

SCCHA continues to focus on its vision and core values, as guided by its five-year Strategic Plan. Every six months, SCCHA reports to its Board the progress on the action items and objectives developed from the Agency’s Strategic Plan Goals. These updates encourage the agency to re-prioritize or revise the objectives of the Plan as necessary and provide a status report to both internal and external stakeholders on how SCCHA’s initiatives align with the Strategic Plan.

Santa Clara County is in the midst of a well-publicized affordable housing crisis. This need is demonstrated by the overwhelming voter approval of \$950 million in Measure A bond funds that will be committed to the development of affordable housing, the bulk of the funds are for the development of housing affordable to extremely low income households and for permanent supportive housing. As described earlier, SCCHA partnered with the County of Santa Clara by providing 258 additional Section 8 PBVs for developers seeking Measure A bond funds. Attaching vouchers to the Measure A development funds insures that units will be affordable for the County’s vulnerable populations, and that new construction properties will have sufficient and long-lasting operating revenue. SCCHA is committed to making available as many additional PBVs in support of Measure A as HUD regulations and funding availability allow.

SCCHA will continue to preserve and improve its affordable housing portfolio and expand the availability of new affordable housing to meet community needs. In addition to using MTW funds where necessary, SCCHA has created a pool of non-federal funds to continue the preservation and rehabilitation of existing SCCHA-managed units. SCCHA will continue to look for other opportunities to invest in new housing opportunities within the County.



## Overview of SCCHA's MTW Activities

**Note:** Closed Out Activities 2009-3, 2009-4, 2009-6, 2009-7, 2009-10, 2009-12, 2010-1, 2012-1 and 2015-1 are not shown.

ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	MTW Statutory Objectives		
		REDUCE COST & ACHIEVE GREATER COST EFFECTIVENESS IN FEDERAL EXPENDITURES	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2009-1 (Amended in FY2016)	Reduced Frequency of Tenant Reexaminations	X	X	
2009-2	Expediting the Initial Eligibility Income Verification Process	X		
2009-5	Exploring New Housing Opportunities for the Chronically Homeless			X
2009-8	30-Day Referral Process for Project-based Vacancies	X		
2009-9	Utilization of Low Income Housing Tax Credit (LIHTC) Tenant Income Certification (TIC) for Income and Asset Verification	X		
2009-11	Project-Base 100 Percent of Units in Family Projects			X
2009-13	Combined Waiting Lists for the County of Santa Clara and the City of San José	X		
2009-14 (amended in FY2014)	Payment Standard Changes Between Regular Reexaminations	X		
2010-2	Excluding Asset Income from Income Calculations for Families with Assets Under \$50,000	X		
2010-3	Applying Current Increased Payment Standards at Interim Reexaminations	X		
2010-4	Allocating Project-Based Vouchers to HACSC-Owned Projects Without Competition	X		
2010-5**	Assisting Over-Income Families Residing at SCCHA-Owned Project Based Voucher Properties			X
2011-1	Streamlined Approval Process for Exception Payment Standard for Reasonable Accommodation – HCV			X
2011-2	Simplify Requirements Regarding Third- party Inspections and Rent Services	X		

ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	MTW Statutory Objectives		
		REDUCE COST & ACHIEVE GREATER COST EFFECTIVENESS IN FEDERAL EXPENDITURES	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2012-2	Minimum Two-year Occupancy in Project-Based Unit	X		
2012-3	Create Affordable Housing Acquisition and Development Fund	X		X
2012-4	Create Affordable Housing Preservation Fund for HACSC- and Affiliate-owned Properties	X		X
2012-5**	Expand Tenant Services at SCCHA or Affiliate-Owned Affordable Housing Properties		X	
2013-1	Elimination of the Earned Income Disallowance (EID) Calculation	X		
2014-1a*	(Re-Proposed) Focus Forward Pilot Program Part I, Case Management, Incentives and Escrow		X	
2014-1b*	(Re-Proposed) Focus Forward Part II, Time Limit and Rent Structure		X	
2014-2*	Eliminate Requirement to Re-Determine Rent Reasonableness when HUD Decreases Fair Market Rents (FMRs)	X		
2014-3**	Freeze on Contract Rent Increases	X		
2014-4 (amended in FY2015)	Increased Tenant Contribution—Up to 35 Percent of Gross Income	X		
2015-2	Project-Based Voucher Inspection Self-Certification	X		
2016-1*	Restriction on Head of Household Changes		X	
2016-2*	Streamlining of PBV Selection Requirements		X	
2017-1	Phasing in the Subsidy Standard Change	X		
2017-2	Special Needs Population Direct Referral Program			X
2017-3	Landlord Initiative			X
2017-4*	Setting the Payment Standards Above 110 Percent of HUD Fair market Rents			X
2018-1*	Strengthening Partnerships through Capacity Building			X

\* Activities Not Yet Implemented

\*\* Activities on Hold

## II. General SCCHA Operating Information

II.1.Plan.HousingStock											
A. MTW Plan: Housing Stock Information											
Planned New Public Housing Units to be Added During the Fiscal Year											
AMP Name and Number	Bedroom Size							Total Units	Population Type *	# of UFAS Units	
	0	1	2	3	4	5	6+			Fully Accessible	Adaptable
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
PIC Dev. # /AMP PIC Dev. Name	0	0	0	0	0	0	0	0	N/A	0	0
Total Public Housing Units to be Added								N/A			
* Select Population Type from: Elderly, Disabled, General, Elderly/Disabled, Other If Other, please describe: <span style="background-color: #ffff00; padding: 2px 50px;">N/A</span>											
Planned Public Housing Units to be Removed During the Fiscal Year											
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed		Explanation for Removal								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
PIC Dev. # /AMP PIC Dev. Name	0		N/A								
Total Number of Units to be Removed	0										

New Housing Choice Vouchers to be Project-Based During the Fiscal Year			
Property Name	Anticipated Number of New Vouchers to be Project-Based *	Description of Project	
Met South	10	Family, new construction project, consisting of 31 units (9 studios, 8 1-bedroom, 5 2-bedroom, and 9 3-bedroom units). PBV units are for seniors and large families.	
Morgan Hill Family - Scattered Site	40	Family, new construction project, consisting of 41 units (6 1-bedroom, 23 2-bedroom, and 12 3-bedroom units). PBV units are for large families, homeless and chronically homeless families.	
Edwina Benner Plaza	23	Family, new construction project, consisting of 65 units for residents. 23 of those units will have PBV attached, with 13 for the Special Needs Direct Referral program and 10 for families at risk of homelessness.	
Laurel Grove Family Apartments	81	Family, new construction project, consisting of 82 units (14 1-bedroom, 43 2-bedroom, and 25 3-bedroom units). PBV units are for families and to be identified special needs and/or chronically homeless families.	
Second Street Studios	134	Family, new construction project, consisting of 135 units (128 studios, 6 1-bedroom, and 1 2-bedroom units). PBV units are for chronically homeless families.	
1701 ECR	16	New construction project, consisting of 65 units (64 studios, 1 1-bedroom manager unit). 16 PBV units are for chronically homeless individuals, and 25 units are HUD-VASH PBV units for chronically homeless veterans (VASH PBV units not reflected here - see below).	
Anticipated Total New Vouchers to be Project-Based	304	Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year	1,744
		Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year	1,744
*New refers to tenant-based vouchers that are being project-based for the first time. The count should only include agreements in which a HAP agreement will be in place by the end of the year.			

**Other Changes to the Housing Stock Anticipated During the Fiscal Year**

The Vermont House rehabilitation construction project, consisting of 16 HUD-VASH PBV units for chronically homeless veterans, opened during FY2018. No MTW PBVs were attached to this project.

The 1701 ECR project (described above) is a new construction project slated to open during FY2019. The project has both MTW and non-MTW PBV units attached (16 PBV units for chronically homeless individuals and 25 HUD-VASH PBV units for chronically homeless veterans).

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

**General Description of All Planned Capital Fund Expenditures During the Plan Year**

SCCHA intends to continue to fund the construction costs of Laurel Grove Family Apartments (82 units) and the Park Avenue Senior Apartments (100 units). Completion for the Laurel Grove Family Apartments is estimated for late Summer 2018 and completion of the Park Avenue Senior Apartments is estimated for early 2020. The total development cost for Laurel Grove is \$56.7 million and the total development cost for Park Avenue is \$65.5 million. Each project is financed with low-income housing tax credits, tax-exempt bonds, a seller loan, Replacement Housing Factor (RHF) funds, Moving to Work (MTW) funds, and in the case of Laurel Grove, \$8 million in State funds. Laurel Grove includes \$1.7 million in MTW funds and \$1.8 million in RHF funds, of which \$1.4 million is expected to be used in FY2019. Park Avenue includes \$9.5 million in MTW funds and \$1.7 million in RHF funds.

II.2.Plan.Leasing		
B. MTW Plan: Leasing Information		
Planned Number of Households Served at the End of the Fiscal Year		
<b>MTW Households to be Served Through:</b>	<b>Planned Number of Households to be Served*</b>	<b>Planned Number of Unit Months Occupied/ Leased***</b>
Federal MTW Public Housing Units to be Leased	4	48
Federal MTW Voucher (HCV) Units to be Utilized	16,775	201,300
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	895	10,740
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
<b>Total Households Projected to be Served</b>	<b>17,674</b>	<b>212,088</b>
<p>* Calculated by dividing the planned number of unit months occupied/leased by 12.</p> <p>** In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.</p> <p>***Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.</p>		
Reporting Compliance with Statutory MTW Requirements		
<p>If the PHA has been out of compliance with any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement, the PHA will provide a narrative discussion and a plan as to how it will return to compliance. If the PHA is currently in compliance, no discussion or reporting is necessary.</p>		
N/A		

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers and/or Local, Non-Traditional Units and Possible Solutions	
Housing Program	Description of Anticipated Leasing Issues and Possible Solutions
Federal MTW Public Housing Units	SCCHA does not anticipate any issues related to the leasing of these units
Housing Choice Voucher (HCV)	HCV program applicants and participants are experiencing challenges in finding suitable housing. Santa Clara County is one of the most expensive areas in the country for rental housing market, and rents continue to increase every year. The average rents are substantially higher than the area's HUD Fair Market Rents (FMRs) and the current vacancy rate for the County is less than three percent. In FY2019, SCCHA continued an intensive owner recruitment and retention program and tenant housing search workshops. Housing search assistance was also implemented for those voucher holders who request extensions to their shopping vouchers.
Federal MTW Non-Traditional Activities	SCCHA did not have any issues associated with leasing these units

II.3.Plan.WaitList				
C. MTW Plan: Wait List Information				
Wait List Information Projected for the Beginning of the Fiscal Year				
Housing Program(s) *	Wait List Type**	Number of Households on Wait List	Wait List Open, Partially Open or Closed***	Are There Plans to Open the Wait List During the Fiscal Year
Federal MTW Public Housing Units	Site Based	700	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific	5,914	Closed	No
Project-Based Local, Non-Traditional MTW Housing Assistance Program	Site Based	8,133	Open	Yes

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

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

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

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

N/A
-----

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

SCCHA used MTW funds for the development of the following housing: Ford Road Plaza - 4,213 on Wait List (closed), the rehabilitation of Clarendon - 1,250 on Wait List (closed) and Bendorf - 913 on Wait List (closed). SCCHA also plans to use MTW funds to refinance Hezler Court Apartments - 670 on Wait List (open), Pinmore Gardens - 500 on Wait List (open), El Parador - 30 on Wait List (closed), Morrone Gardens - 200 on Wait List (open), and Blossom River - 357 on Wait List (closed).
---

If Other Wait List Type, please describe:

N/A
-----

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

None
------



### III. Proposed MTW Activities (HUD Approval Requested)

This section describes the new MTW activities that SCCHA proposes to implement in FY2019.

#### Expand Landlord Initiatives: Bonus Payment (Re-Proposed Activity 2017-3)

##### DESCRIPTION OF MTW ACTIVITY

The rental housing market in Santa Clara County ranks as one of the most expensive in the nation with record low vacancy rates. SCCHA has implemented a renewed focus on property owner recruitment and retention in order to increase and preserve the number of affordable housing options for its voucher holders throughout the County. In an effort to attract new Housing Choice Voucher (HCV) owners, SCCHA is re-proposing a landlord initiative activity begun in 2017 to include new HCV program owners who may otherwise be discouraged by the additional administrative burden associated with the HCV program. New owners who rent their unit to an HCV participant will receive a bonus payment of between \$500 and \$2,500. Through this activity, SCCHA hopes to provide incentives to attract new owners to the HCV program and increase the number of rental units available for Section 8 families.

This activity was originally proposed to provide vacancy payments to participating owners who re-lease a vacant HCV unit to a new HCV participant. The activity is being re-proposed to expand the initiatives SCCHA is able to offer landlords to increase and maintain rental units available for Section 8 families.

The bonus payment amount will range between \$500 and \$2,500—an amount that was determined to be reasonable after evaluating the program-wide contract rent range. Landlords will receive a one-time bonus payment equal to the amount of the unit's one month's rent, not to exceed \$2,500. The bonus payment amount will be reviewed annually and included in SCCHA's Section 8 Administrative Plan. SCCHA staff will evaluate several factors prior to determining the need for implementing the annual bonus payment, including: County vacancy rates, open market rental costs, and the amount of participants shopping for housing. The amount and necessity of the bonus payment will be evaluated on an annual basis using information collected annually from the Agency's electronic database, Emphasys Elite.

##### RELATION TO STATUTORY OBJECTIVES

This activity addresses the statutory objective of increasing housing choices for low income families by providing an incentive for new owners to join the program thereby increasing the housing inventory for HCV participants.

##### ANTICIPATED IMPACT OF THE ACTIVITY

SCCHA anticipates that this activity will increase the number of HCV units available to be leased by HCV participants and provide an incentive for new owner participation in the HCV program.

### ANTICIPATED SCHEDULE FOR ACHIEVING THE STATED OBJECTIVES

This activity is anticipated to be implemented within 90 days of receipt of HUD approval. Based on the timing of previous HUD approval dates of past years' SCCHA MTW Plans, it is anticipated that implementation of this activity will likely occur in December 2018.

### PROPOSED BASELINES, BENCHMARKS, METRICS AND DATA COLLECTION

SCCHA set its benchmark based on the number of landlords who rented to Section 8 tenants in Fiscal Year 2017. Data related to this activity will be collected annually from the Agency's electronic database, Emphasys Elite.

Activity 2017-3: Re-Propose Landlord Initiatives/Bonus Payment				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>HC #1: Additional Units of Housing Made Available</b>				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase)	0	50	N/A	N/A
<b>HC #5: Increase in Resident Mobility</b>				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	5	N/A	N/A

### AUTHORIZATION FOR THE ACTIVITY

This proposed activity is authorized in SCCHA's Moving to Work Agreement, Attachment C, Section B(1) and waives certain provisions of Section 8 and 9 of the 1937 Act and 24 CFR 982 and 990 as necessary to implement that Agency's Annual MTW Plan. This authorization is needed to allow the use of MTW funds to pay incentive payments to HCV property owners in addition to Project Based Voucher owners.

### RENT REFORM IMPACT ANALYSIS, HARDSHIP CASE CRITERIA, ANNUAL REEVALUATION AND TRANSITION PERIOD

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2019 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

## 2019-1: Graduation Bonus (Proposed Activity)

### DESCRIPTION OF MTW ACTIVITY

Currently, HUD regulations state that “HAP contract terminates automatically 180 calendar days after the last housing assistance payment to the owner.” (24 CFR §982.455). In practice, this regulation has three elements: (1) the threshold HAP amount (\$0); (2) the time period (180 days); and (3) the ending of HAP assistance. Proposed Activity 2019-1 seeks to change the threshold HAP amount and the time period, and add a financial payment upon the ending of housing assistance to the family.

Participants in SCCHA’s MTW HCV program whose income has increased to the point where their HAP has fallen below \$100 per month will be paid \$2,000 per eligible individual in the family and removed from the Section 8 Housing Choice Voucher program 60 days after the family’s income has been certified by SCCHA and written notice of their new rent amount has been sent to the family. For the purposes of this activity, “eligible individual” means the members of the HCV participant family who have eligible immigration status, and excludes 1) individuals who have ineligible immigration status, 2) live-in aides, and 3) foster adult/children. This amount (\$2,000 per eligible individual) is approximately the average individual monthly income of families that would be affected by this activity. As of January 25, 2018, the average annual family income of SCCHA MTW HCV participants with less than \$100 HAP was \$77,907 with an average family size of 3. This income amount is greater than 80% of the Area Median Income in Santa Clara County for three-person families. The graduation bonus payment will be contingent on the participant family making a positive exit from SCCHA’s program – meaning the family must not be involuntarily terminated from the program for any reason except for this activity.

The graduation bonus paid by this activity is intended to ease the transition of formerly-assisted families into the unsubsidized housing market. The payment is a “cushion” which will serve as a financial reserve. Since the families affected by this activity will already have reached the point where their HAP is minimal, it is SCCHA’s expectation that graduated families will either stay in their current units or move to a more preferred unit. SCCHA does not intend, however, to exercise any control or influence over how graduated families spend their graduation bonus money. SCCHA does not currently plan on providing any further services to families once they graduate.

The activity will also increase voucher turnover and speed the rate at which SCCHA can service applicants on its Section 8 waiting list. SCCHA does not expect this activity to have any significant impact on the requirement to serve substantially the same (STS) number of households, because of the increased voucher turnover. As of June 1, 2018, SCCHA’s HCV waiting list had over 4,800 registrants. Therefore, for each family who leaves the program because of this activity, a new family can receive the benefit of the voucher turnover.

### **RELATION TO STATUTORY OBJECTIVES**

This activity supports the statutory objective of promoting participants' economic self-sufficiency by easing the transition from the Section 8 program to the unsubsidized housing market.

### **ANTICIPATED IMPACT OF THE ACTIVITY**

As of January 25, 2018, forty-five (45) participant households had monthly HAP amounts of less than \$100. SCCHA expects this activity to increase the number of families that will graduate from the Section 8 program.

### **ANTICIPATED SCHEDULE FOR ACHIEVING THE STATED OBJECTIVES**

This activity will be implemented upon approval. Upon implementation of the necessary changes to SCCHA's computer and financial systems, participants for whom SCCHA has been paying zero HAP for 120 days or more will receive a written notice informing them of the graduation bonus they will receive upon the end of their participation in the Section 8 program. Those participants for whom at the time of implementation SCCHA is paying between \$1 and \$99 (inclusive) HAP per month, and those participants for whom SCCHA has been paying zero HAP for less than 120 days, will receive written notice that their participation in the Section 8 program will be terminated 60 days after the date of the notice, and that they will be receiving the graduation bonus.

### **PROPOSED BASELINE, BENCHMARKS, METRICS AND DATA COLLECTION**

Data related to this activity will be collected and retrieved at least annually from the Agency's electronic database. After implementation, SCCHA will re-evaluate and refine and/or revise the standardized metrics as needed, at least once annually.

For Metric SS #8 below, SCCHA counts as the baseline the number of households whose participation in the Section 8 program were ended in CY 2017 because of zero HAP. The benchmark adds the number of households who had monthly HAP amounts of less than \$100 as of January 25, 2018.

Activity 2019-1: Graduation Bonus				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>SS #8: Households Transitioned to Self-Sufficiency</b>				
Number of households transitioned to self-sufficiency (increase).	24	69	N/A	N/A
<b>HC #3: Decrease in Wait List Time</b>				
Average applicant time on wait list in months (decrease)	95	84	N/A	N/A

### **AUTHORIZATION FOR THE ACTIVITY**

The proposed activity is authorized in Attachment C, Paragraphs D and E of the SCCHA's MTW Agreement, and waives certain provisions of Sections 8(o)(4), 16(b), and 23 of the 1937 Act and 24 C.F.R. 5.603, 5.609, 5.611, 5.628, 982.201, and 984 as necessary to implement SCCHA's MTW Plan. This authorization is needed in order to change the threshold HAP amount necessary to initiate an automatic termination, to change the time period before automatic termination, and to provide for a graduation bonus payment upon automatic termination.

### **RENT REFORM IMPACT ANALYSIS, HARDSHIP CASE CRITERIA, ANNUAL REEVALUATION AND TRANSITION PERIOD**

This activity does not qualify as a rent reform initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2019 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

## **2019-2: Family Self-Sufficiency Program – Waive Contract of Participation Requirements (Proposed Activity)**

### **DESCRIPTION OF MTW ACTIVITY**

Currently, under HUD regulations, the Family Self-Sufficiency (FSS) program requires the execution of a Contract of Participation (CoP) (HUD Form-52650) between the Public Housing Authority (PHA) and the Head of Household (HoH) of the participating FSS family. The CoP states that in order to properly create the FSS escrow account, the enrolling family must use income and tenant rent portion obtained from an interim or annual reexamination that occurred within 120 days of the CoP execution date. If the last interim or annual reexamination occurred more than 120 days from the CoP execution, the PHA must conduct a new interim reexamination to re-determine the income and rent portion of the enrolling FSS program family.

With this activity, SCCHA is proposing to waive the requirement that a family enrolling in the FSS program must have an interim or annual reexamination conducted within 120 days of the CoP effective date. Due to SCCHA's biennial reexamination schedule, many working families' rent portions have not been reviewed for almost two years. Therefore, the required FSS interim reexamination may result in an increased income and tenant rent portion. However, when the FSS enrollment interim reexamination is conducted and it is determined that the family has increased their income, the increase will not be captured in escrow savings. By waiving the 120-day requirement, enrolling FSS participants will start the program at the pre-determined income and tenant rent portion, and as a result, when an income increase is captured at the next interim or annual reexamination, they will be able to experience an increase to their escrow account savings. Additionally, SCCHA has found that this requirement may be a deterrent to enrollment. In 2017, after attending FSS Program orientation, 66 SCCHA families showed interest in the program. Once these families were informed of the requirement of possibly having their tenant rent portions revised, only 30 followed through with enrollment. SCCHA anticipates that by waiving this requirement, FSS clients will experience more savings accrued in their escrow account and overall enrollment will increase, thus allowing more families to receive services to improve their self-sufficiency.

In addition, SCCHA is proposing to waive the requirement that the HoH of the FSS family must maintain suitable employment and complete the requirements of the CoP before the family can be classified as a "successful FSS completion." SCCHA is proposing to use its MTW designation to allow families to be classified as a "successful FSS completion" and receive escrow as long as at least one adult household member completed an Individual Training and Services Plan (ITSP) and was suitably employed at graduation. Under this activity, the HoH would still be held to the

requirements of the CoP and ITSP, but another household member who established ITSP goals could be the one to fulfill the final goal of maintaining suitable employment. The implementation of this activity will allow SCCHA to broaden the pool of families who could benefit from the FSS program's escrow savings account to include families where the HoH is unable to work due to disability or other reasons.

### RELATION TO STATUTORY OBJECTIVES

This activity addresses the statutory objective of increasing self-sufficiency for low income families by providing a less restrictive enrollment process for SCCHA families who are interested in receiving the services of the FSS program. SCCHA also anticipates that families will be able to increase their escrow account savings. Lastly, this activity will increase agency cost savings as it will reduce the amount of staff hours expended in conducting additional reexaminations immediately prior to enrollment.

### ANTICIPATED IMPACT OF THE ACTIVITY

SCCHA anticipates that this activity will increase the number families enrolled in the FSS program, and thus will increase the number of families who are receiving services to further their goals of becoming self-sufficient.

### ANTICIPATED SCHEDULE FOR ACHIEVING THE STATED OBJECTIVES

This activity is anticipated to be implemented upon approval.

### PROPOSED BASELINE, BENCHMARKS, METRICS AND DATA COLLECTION

Data related to this activity will be collected and retrieved annually from the Agency's electronic database. As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2019 - 2: Family Self Sufficiency Program - Waive Contract of Participation Requirements				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>SS#1: Increase Household Income</b>				
Average earned income of households affected by this policy in dollars (increase).	\$22,222	\$26,060	N/A	N/A
<b>SS#2: Increase Household Savings</b>				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$5,056	N/A	N/A

<b>SS#5: Households Assisted by Services that Increase Self-Sufficiency</b>				
Number of households receiving services aimed to increase self-sufficiency (increase).	232	268*	N/A	N/A
<b>SS#8: Households Transitioned to Self-Sufficiency</b>				
Number of households transitioned to self-sufficiency (increase).**	0	4	N/A	N/A
<b>CE#1: Agency Cost Savings</b>				
Total cost of task in dollars (decrease).***	\$8,089	0	N/A	N/A
<b>CE#2: Staff Time Savings</b>				
Total time to complete the task in staff hours (decrease).***	66	0	N/A	N/A

\*There are currently 232 participants actively enrolled in the FSS program. SCCHA believes that by waiving the 120-day interim reexamination requirement, enrollment will increase by an additional 36 prospective participants who had previously chosen not to enroll.

\*\*Self-sufficiency is defined as a household who leaves housing assistance voluntarily or whose income is equal to or greater than 80 percent of the AMI. With this metric, SCCHA reviewed data for FSS participants who reached 80 percent of the AMI or left housing assistance voluntarily in 2017.

\*\*\* SCCHA anticipates there will be staff time and agency cost savings with the waiving of the 120-day interim reexamination requirement. If the 66 prospective participants would have enrolled in the FSS program, SCCHA would realize savings for cost and time of 66 interim reexaminations.

### **AUTHORIZATION FOR THE ACTIVITY**

The proposed activity is authorized in Attachment C, Paragraph E and waives certain provisions of Section 23 of the 1937 Act and 24 CFR 984 as necessary to implement SCCHA's MTW Plan.

This authorization is needed to waive FSS program Contract of Participation requirements.

### **RENT REFORM IMPACT ANALYSIS, HARDSHIP CASE CRITERIA, ANNUAL REEVALUATION AND TRANSITION PERIOD**

This activity does not qualify as a rent reform initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2019 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.



**2019-3: Waiving the Requirement that a PHA Re-determine Rent Reasonableness for Manufactured Home Spaces Annually (Proposed Activity)**

**DESCRIPTION OF MTW ACTIVITY**

SCCHA proposes the elimination of the HUD requirement that a PHA must annually re-determine that the current rent to owner is reasonable for a manufactured home space. SCCHA will continue to perform a full rent reasonableness review at the time of a new contract, owner requested rent changes, tenant request, or when deemed necessary by SCCHA staff. Because rent reviews will continue after implementation of this activity, the protections of rent reasonableness determinations will remain available to the agency without additional costs.

**RELATION TO STATUTORY OBJECTIVES**

The proposed activity addresses the statutory objective of achieving greater cost effectiveness in federal expenditures by eliminating the administrative burden placed on SCCHA staff to perform additional rent reasonableness reviews.

**ANTICIPATED IMPACT OF THE ACTIVITY**

SCCHA anticipates a decrease in staff time to process the additional rent reasonableness reviews required for manufactured home space rentals. Numerous variables affect the amount of staff time it takes to perform the rent reasonableness review for all the manufactured homes in the program. SCCHA estimates that each rent review takes approximately 42 minutes to complete, if no owner negotiation is needed. An MTW activity is necessary because HUD regulations require that rent reasonableness of manufactured home spaces be re-determined annually.

SCCHA does not anticipate any adverse effects to participants by this activity as manufactured home owners may request rent reasonableness reviews if they believe the contract rent is not at market standards.

**ANTICIPATED SCHEDULE FOR ACHIEVING THE STATED OBJECTIVES**

SCCHA anticipates implementing this activity upon approval.

**PROPOSED BASELINE, BENCHMARKS, METRICS AND DATA COLLECTION**

Data related to this activity will be collected and retrieved annually from the Agency's electronic database.

As this activity is implemented, SCCHA may revise the activity's metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2019 - 3: Waiving the Requirement that a PHA Re-determine Rent Reasonableness For Manufactured Home Spaces Annually				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>CE #1: Agency Cost Savings</b>				
Total cost of task in dollars (decrease)	\$750	\$0	\$0	N/A
<b>CE #2: Staff Time Savings</b>				
Total time to complete the task in staff hours (decrease)	42 min per unit	0 minutes per unit	0	N/A
<b>CE #3: Decrease in Error Rate of Task Execution</b>				
Average error rate in completing task as a percentage (decrease)	0	0	0	N/A

### AUTHORIZATION FOR THE ACTIVITY

The proposed activity is authorized in Attachment C, Paragraph D (2)(c) and waives certain provisions of Section 8(o)(10) of the 1937 Act and 24 C.F.R. 982.507 as necessary to implement SCCHA’s Annual MTW Plan. This authorization is needed to waive the annual manufactured home space rent reasonableness determinations requirement.

### RENT REFORM IMPACT ANALYSIS, HARDSHIP CASE CRITERIA, ANNUAL REEVALUATION AND TRANSITION PERIOD

This activity does not qualify as a rent reform initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2019 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

## **2019-4: Streamlining the Lease-Up Process (Proposed Activity)**

### **DESCRIPTION OF MTW ACTIVITY**

SCCHA proposes to revise its lease-up process in order to alleviate the delays associated with the processing and completion of the Request for Tenancy Approval (RFTA) packet, tenancy addendum, and lease. The standard form documents, especially Form HUD-52517 and the information that is required to be in the lease, can be confusing to owners and tenants alike.

SCCHA's Customer Service Initiative program was started in FY2016 in order to better understand critical issues facing tenants, owners, and prospective owners. Owners specifically singled out the RFTA process as source of frustration. In particular, standard Form HUD-52517 was identified as a significant hurdle. The standard form requires owners to fill in information which is already obtained elsewhere, thus being redundant, and also must match exactly with terms in the lease. Any mismatch, no matter how insignificant, results in delays as staff must then confer with the owner in order to rectify the mistake. In addition to being redundant, much of the information obtained by HUD-52517 is not necessary for SCCHA, since utility allowances are not included in rent calculation (Activity 2014-4).

This activity seeks to alleviate the aforementioned concerns by waiving 24 CFR §982.162 and §982.308 as necessary to change the requirement of using Form HUD-52517 and to simplify and streamline what constitutes an approvable lease.

### **RELATION TO STATUTORY OBJECTIVES**

The proposed activity addresses the statutory objective of increasing available housing choices to participants by eliminating duplicative and redundant requirements in the lease-up process, which has been identified in surveys as a key factor which discourages owners from renting to Section 8 tenants.

### **ANTICIPATED IMPACT OF THE ACTIVITY**

SCCHA anticipates that this activity will improve customer service and communication between SCCHA and its participating owners and reduce the time necessary for the completion of the RFTA and lease up processes. This will in fact allow for an increase in housing choices for Section 8 tenants by allowing for the retention of current owners as well as potentially attracting new owners to the program. The activity will also reduce staff time dedicated to this task resulting in administrative cost savings.

### **ANTICIPATED SCHEDULE FOR ACHIEVING THE STATED OBJECTIVES**

This activity is anticipated to be implemented immediately upon approval.

## PROPOSED BASELINE, BENCHMARKS, METRICS AND DATA COLLECTION

CE #1- Agency Cost Savings and CE #2 – Staff Time Savings will be determined once the activity is implemented and time savings studies are conducted to establish baselines and benchmarks.

Data related to this activity will be collected and retrieved annually from the Agency’s electronic database.

As this activity is implemented, SCCHA may revise the activity’s metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2019 - 4: Streamlining the Lease-Up Process				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>HC #1: Additional Units of Housing Made Available</b>				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase)	0	TBD	N/A	N/A
<b>CE #1: Agency Cost Savings</b>				
Total cost of task in dollars (decrease).	TBD	TBD	\$0	N/A
<b>CE #2: Staff Time Savings</b>				
Total time to complete the task in staff hours (decrease).	TBD	TBD	0	N/A

## AUTHORIZATION FOR THE ACTIVITY

The proposed activity is authorized in SCCHA’s MTW Agreement at Attachment C, Paragraph D(2)(b) and waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24 CFR 982.308, 982.451 and 983 Subpart E as necessary to implement SCCHA’s MTW Plan. This authorization is necessary in order to waive the requirement of using form HUD-52517, and the information and documents which are required to be in an approved lease between a Section 8 participant and owner.

## RENT REFORM IMPACT ANALYSIS, HARDSHIP CASE CRITERIA, ANNUAL REEVALUATION AND TRANSITION PERIOD

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2019 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

## IV. Approved MTW Activities (HUD Approval Previously Granted)

To date, SCCHA has had 41 activities approved by HUD. Of these, nine were closed out. The first four numbers of each activity signify the fiscal year in which each activity was approved. Except where indicated in the activity status explanation, SCCHA does not anticipate any changes or modifications to the activities during the Plan year.

### Implemented Activities

#### 2009-1: REDUCED FREQUENCY OF TENANT REEXAMINATIONS (AMENDED IN FY16)

This activity, originally implemented in 2009, reduces the frequency of participant reexaminations in the voucher program. Participants with a fixed income are reexamined every three years and participants with a non-fixed income are reexamined every two years. In FY2015, SCCHA added an amendment to this activity to include its four public housing units under the new reexamination schedule. By including its public housing units under the modified reexamination schedule, SCCHA continues to recognize administrative streamlining and labor savings for both its Section 8 and 9 programs. In FY2016, SCCHA created its own in-house form Release of Information, to replace the standard HUD Form 9886.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

#### 2009-2: EXPEDITING THE INITIAL ELIGIBILITY INCOME VERIFICATION PROCESS

This activity, implemented in FY2009, extends the timeframe of the application documents window from 60 days to 120 days.

Extending the documentation timeframe continues to provide administrative relief, both to applicants and to SCCHA. With this activity, applicants do not need to continually provide updated documentation if the previously provided information becomes too old (dated older than 60 days) before voucher issuance. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

#### 2009-5: EXPLORING NEW HOUSING OPPORTUNITIES FOR THE CHRONICALLY HOMELESS

The Chronically Homeless Direct Referral (CHDR) program was originally implemented in FY2009 and direct referrals of chronically homeless applicants began in FY2011. The CHDR program increases housing choices and mobility by assisting the homeless population through a targeted process, different than the standard voucher waiting list system. Following a housing-first model, identified chronically homeless families not on the voucher waiting list are referred

for tenant-based housing assistance and connected to case management services with local service providers. The CHDR program continues to be a valuable community housing resource.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2009-8: 30-DAY REFERRAL PROCESS FOR PROJECT-BASED VACANCIES**

This activity was implemented in FY2010, and allows owners to directly refer applicants after 30 days of unsuccessful attempts to fill the Project-Based Voucher (PBV) unit using referrals from the SCCHA waiting list. This activity reduces the vacancy time for owners and the resultant loss in money thus ensuring the continuation of the PBV contract and the affordability of the units for low income households. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2009-9: UTILIZATION OF LOW INCOME HOUSING TAX CREDIT (LIHTC) TENANT INCOME CERTIFICATION (TIC) FOR INCOME AND ASSET VERIFICATION**

This activity, first implemented in 2010, allows SCCHA to utilize the owner-provided Tenant Income Certification (TIC) form required under the Low Income Housing Tax Credit (LIHTC) Program as its sole method for verification of the family's income and assets when filling PBV vacancies for tax credit units. Prior to implementation, households selected to fill a PBV unit that utilized tax credits had to complete initial eligibility calculations under both the Federal LIHTC regulations (Section 42 of the IRS Code) and the Section 8 PBV regulations (24 CFR 5.657, 5.659). SCCHA currently uses property-owner TIC documentation for initial eligibility and at each regularly scheduled reexamination to verify income and family composition.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2009-11: PROJECT-BASE 100% OF UNITS IN FAMILY PROJECTS**

This activity was implemented in FY2010, and allows SCCHA to project-base more than 25% of the units in an existing building in multi-family complexes without requiring participation in supportive services. Although supportive services are provided and families must be made aware of and encouraged to participate in these services offered by owners, participation is not mandatory. The activity increases housing choices for low-income families by making the units more attractive to families who may choose to not accept or do not need supportive services. It continues to reduce the administrative burden by removing the compliance monitoring that the Agency would need to do for families living in the "excepted" units (i.e. units above the 25% cap).

SCCHA has project-based all family public housing projects eligible for this activity. Supportive services remain available on-site for four previously project-based family projects (Eklund I, Miramar Way, Julian Gardens, and Lucretia Gardens).

SCCHA intends to expand this activity beyond existing buildings to include all housing projects that make supportive services available, without requiring participation, to all assisted families in the project.

There are no changes to the activity's metrics, baselines, or benchmarks with regard to metric HC #4. However, as part of the expansion of this activity to include all housing projects, SCCHA is proposing the addition of metric HC #1.

Activity 2009 - 11: Project – Base 100% of Units in Family Projects				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>HC #1: Additional Units of Housing Made Available</b>				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). These units serve families	0	162	162	N/A

### 2009-13: COMBINED WAITING LIST FOR THE COUNTY OF SANTA CLARA AND THE CITY OF SAN JOSÉ

In 1976, SCCHA signed an agreement to administer the Housing Choice Voucher program on behalf of the City of San José. This agreement allows SCCHA to operate under one Annual Plan, one Administrative Plan, and one combined MTW plan for both housing authorities. In accordance with this agreement, in FY2009, this activity was implemented to permit SCCHA to waive regulation 24 CFR 982.404(f), and to continue to operate one combined waiting list for both the County of Santa Clara and the City of San Jose. This activity allows SCCHA to operate a joint waiting list for the Housing Choice Voucher (HCV) and the Project Based Voucher (PBV) Programs. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### 2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS (AMENDED IN FY14)

This activity, implemented in FY2010, allows SCCHA to effectuate an immediate change in voucher size and its corresponding payment standard when changes in family composition or SCCHA's subsidy size policy occur between regular reexaminations. If the application of the new payment standard results in a decrease in the tenant's rent portion, the interim reexamination effective date will be the first of the month following the change. If the

application of the new payment results in an increase in the tenant's rent portion, the interim reexamination effective date will be the first of the month following a 30-day notice to the tenant and owner. This activity continues to result in Housing Assistance Payment (HAP) cost savings by enabling the new payment standards to take effect at the time of an interim reexamination rather than at the next regular reexamination. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2010-2: EXCLUDING ASSET INCOME FROM INCOME CALCULATIONS FOR FAMILIES WITH ASSETS UNDER \$50,000**

SCCHA no longer calculates income received from family assets under \$50,000. Since implementation in FY2010, SCCHA has reduced administrative costs through this activity. SCCHA continues to save costs of staff time previously spent on this task. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2010-3: APPLYING CURRENT INCREASED PAYMENT STANDARDS AT INTERIM REEXAMINATIONS**

This MTW activity allows the application of the current payment standard (if the payment standard has increased since the family's last regular reexamination) to the rental assistance calculation at interim reexaminations. Since implementation in FY2010, SCCHA has met the statutory objective of reducing administrative costs and increasing housing choice for low-income families. SCCHA has realized savings in staff hours and cost of tasks. SCCHA used this activity during FY2017 when the payment standard was raised on January 1, 2017. SCCHA reported on the outcomes in its FY2017 MTW Report. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2010-4: ALLOCATING PROJECT-BASED VOUCHERS TO SCCHA-OWNED PROJECTS WITHOUT COMPETITION**

This MTW activity was implemented in 2011, and allows the Agency to select SCCHA-managed housing for project-based assistance without a competitive process, saving both staff time and other costs that would be related to a competitive process. As a result of this activity, SCCHA is



able to cost-effectively and efficiently ensure that these project based units are available. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2011-1: STREAMLINED APPROVAL PROCESS FOR EXCEPTION PAYMENT STANDARD FOR REASONABLE ACCOMMODATION - HCV**

This activity, implemented in FY2011, allows SCCHA to approve any requests for an exception payment standard above 110 percent (but not to exceed 120 percent) of the published Fair Market Rent (FMR) as a reasonable accommodation for persons with disabilities. This activity continues to improve SCCHA's responsiveness to the needs of families with members who have disabilities, which provides increased housing choices by enabling them to secure an accessible unit more expeditiously.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2011-2: SIMPLIFY REQUIREMENTS REGARDING THIRD-PARTY INSPECTIONS AND RENT SERVICES**

SCCHA implemented this activity in FY2011 in order to waive the regulatory requirement in which HUD must approve a designated, qualified independent agency to conduct Housing Quality Standards (HQS) inspections and rent reasonableness services for SCCHA-owned units. The qualified independent agency conducts both initial and regularly scheduled HQS inspections, as well as rent reasonable services for initial contracts and requested rent adjustments for SCCHA-owned or -controlled properties. In addition, this activity has allowed SCCHA to waive the second part of the HUD regulation that requires the independent agency to supply copies of each inspection report and rent reasonableness determination to the HUD field office. SCCHA continues to realize the ongoing benefits associated with reduced costs and administrative streamlining related to this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2012-2: MINIMUM TWO-YEAR OCCUPANCY IN PROJECT-BASED UNIT**

The purpose of the activity is to enhance the occupancy stability in the PBV program, which will result in reduced staff time spent processing PBV move-outs and vacancy outreach. Project-based participants are required to remain in their PBV units for a minimum of two years prior to

becoming eligible to request a tenant-based voucher to move with continued assistance. The activity does not apply to families: (1) with an approved reasonable accommodation that requires them to move; (2) who experience a change in family composition that affects unit size; (3) who present other compelling reasons to move out; or (4) who request a move under the Violence Against Women Act (VAWA).

In November 2014, SCCHA began implementing this activity. SCCHA created its own PBV Statement of Family Responsibility and PBV Tenancy Addendum forms to replace the HUD forms. SCCHA versions remain the same as the HUD versions except for the stipulation on the two-year PBV residency requirement. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2012-3: CREATE AFFORDABLE HOUSING ACQUISITION AND DEVELOPMENT FUND**

This activity, implemented in FY2012, allows SCCHA to use MTW funds to pursue opportunities to build new affordable rental housing units through the acquisition of existing land and/or funding the development of units for new construction or rehabilitation.

SCCHA currently does not have plans to acquire new parcels of land in FY2019, however, we continue to look for opportunities to do so.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2012-4: CREATE AFFORDABLE HOUSING PRESERVATION FUND FOR SCCHA AND AFFILIATED-OWNED PROPERTIES**

This activity, implemented in FY2012, allows SCCHA to use MTW funds to assist in its preservation activities and to support the asset management staff that has oversight of the affordable units. The preservation activities include using MTW funds for expenses incurred in rehabilitating the units to extend their useful life and affordability, or to acquire the property or limited partner's interest at the end of the tax credit period to maintain the asset's affordability into the future, or pay off existing loans in order to leverage additional financing. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2013-1: ELIMINATION OF THE EARNED INCOME DISALLOWANCE (EID)**

This activity eliminates the HUD-mandated Earned Income Disallowance (EID) calculation. With federal sequestration in FY2013, SCCHA placed utilization of this activity on hold. The agency implemented this activity in early FY2015. Since implementation, this activity continues to decrease staff time required to calculate a family's rent portion and reduces errors associated with calculating potential income exclusions. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2014-4: INCREASED TENANT CONTRIBUTION – UP TO 35% OF GROSS INCOME**

This activity, applicable to both the voucher and public housing programs, simplified the calculation of Total Tenant Payment (TTP) by removing all standard deductions and allowances and calculating a TTP between 30 and 35 percent of the gross monthly income or \$50 (minimum rent), whichever is higher. The activity, proposed and implemented in FY2014, also eliminated the inclusion of a utility allowance in the tenant rent calculation. The initial implementation of this activity increased the TTP to 35 percent as a cost-saving measure in response to diminished funds resulting from federal sequestration. In September 2014, the TTP was reduced to 32 percent. SCCHA re-proposed this activity in FY2015 to include its four public housing units. This activity provides significant costs savings to SCCHA by reducing the amount of Housing Assistance Payment (HAP) the Agency pays. Additionally, the simplified calculation reduces staff hours by streamlining this task. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2015-2: PROJECT-BASED VOUCHER INSPECTION SELF-CERTIFICATION**

This activity was approved and implemented in FY2015 and allows Project Based Voucher owners and tenants to self-certify the correction of reported HQS deficiencies within the 30-day timeframe. This activity waives the regulatory requirement for only non-life threatening deficiencies. This activity reduces expenditures by eliminating the scheduling and conducting of a recheck inspection to determine if necessary repairs were made. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

## **2016-2: STREAMLINING OF PBV SELECTION REQUIREMENTS**

This activity was implemented in FY2018 and eliminates certain requirements in selecting Project-Based Voucher (PBV) proposals by expanding the definition of a competitive selection process to include any form of open public solicitation or invitation process conducted by a Federal, State, or local government, where a proposal is selected subject to funding availability; waiving HUD's requirements that the PHA must select proposals within three years of the earlier selection date by allowing proposals within fifteen years of the selection date; and allowing earlier competitive selection proposals to consider that the project would require rental assistance, including PBV assistance. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

## **2017-1: PHASING IN A SUBSIDY STANDARD CHANGE**

This activity, implemented in FY2017, allowed SCCHA to change the agency's subsidy standard policy to two persons per bedroom. Under this activity, if a household's voucher size changes due to the subsidy size change, the new voucher size does not take effect for households in a unit under a Housing Assistance Payment contract until (1) the family moves; or (2) the rental market vacancy rate remains five percent or higher for at least six months, whichever occurs first. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

## **2017-2: SPECIAL NEEDS POPULATION DIRECT REFERRAL PROGRAM**

This activity creates an exception to Section 8 waiting list regulations to create a direct referral program for certain special needs populations who are not best served by traditional waiting lists – defined as persons with disabilities who experience multiple barriers to housing and who require supportive services, including case management, psychotherapy, or counseling in order to obtain and/or maintain permanent housing.

SCCHA selected the Office of Supportive Housing of Santa Clara County as the partner who will provide case management and referral of prospective tenants. SCCHA is currently finalizing the partnership with the County's Office of Supportive Housing for referrals and supportive housing. SCCHA anticipates utilizing this referral source to fill units during FY2019.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2017-3: LANDLORD INITIATIVES**

This activity authorizes SCCHA to administer vacancy payments to Section 8 landlords who re-rent their unit to SCCHA program participants.

In March 2017, SCCHA implemented Activity 2017-3, which provides vacancy payments for owners who re-rent their unit to a Section 8 participant. This activity increases the number of HCV units that are re-leased to HCV participants, ensuring the long-term viability of units that will be available to HCV low-income tenants and provides an incentive for owner participation in the HCV program. SCCHA continues to utilize this activity.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA is expanding the Landlord Initiatives and is re-proposing the Initiative to HUD in this FY2019 MTW Plan.

## Activities Not Yet Implemented

### **2014-1A: FOCUS FORWARD PILOT PROGRAM PART I – CASE MANAGEMENT, INCENTIVES AND ESCROW**

The Focus Forward Program (FFP) is an expanded version of the traditional FSS program, and will support HCV participants in increasing and sustaining a higher level of self-sufficiency. Originally proposed in the FY2014 MTW Plan, SCCHA re-proposed the FFP with a more robust case management and ongoing program-incentives component. The enhanced FFP will promote accountability and motivate participants to pursue higher education, develop 21st century job skills and set/achieve realistic self-sufficiency goals.

SCCHA is currently reviewing its implementation plans for this activity. SCCHA is also carefully evaluating similar MTW activities at other public housing authorities. At this point, it is unlikely to be implemented in FY2019.

### **2014-1B: FOCUS FORWARD PART II – TIME LIMIT AND RENT STRUCTURE**

Families that are currently on the SCCHA waiting list will have the option to enroll in the FFP, with the condition that their assistance will have a ten-year time limit. In addition to the ten-year time limit, and to prepare participants for transitioning off of assistance, SCCHA has designed an alternative rent calculation for the FFP in which participants will take on more fiscal responsibility for their rental payments as they progress through the program.

SCCHA is currently reviewing its implementation plans for this activity. SCCHA is also carefully evaluating similar MTW activities at other public housing authorities. At this point, it is unlikely to be implemented in FY2019.

### **2014-2: ELIMINATE REQUIREMENT TO RE-DETERMINE RENT REASONABLENESS WHEN HUD DECREASES FAIR MARKET RENTS (FMRs)**

This activity eliminates the HUD requirement to re-determine the rent reasonableness of affected units within 60 days of the contract anniversary date when HUD reduced FMRs by 10% or more. SCCHA expects that it will save money on staff time required for FMR analysis, comparison database upkeep, and reexamination processes. SCCHA has yet to implement this activity because HUD has not decreased FMRs since the activity was approved. SCCHA plans to implement this activity upon the event that HUD reduces FMRs by 10% or more.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2016-1: RESTRICTION ON HEAD OF HOUSEHOLD CHANGES**

This activity encourages self-sufficiency by allowing the Head of Household (HoH) to leave the program and transfer his or her voucher to a remaining non-elderly, non-disabled family member only if that family member joins SCCHA's Focus Forward Program (FFP). The new HoH who enrolls in the pilot FFP has the opportunity to work with assigned case managers and set economic self-sufficiency goals.

This will be implemented when SCCHA implements the FFP. SCCHA will revise the activity's metrics to include HUD standard metrics SS#6 and SS#7 at that time.

### **2017-4: SETTING THE PAYMENT STANDARDS ABOVE 110 PERCENT OF HUD FAIR MARKET RENTS (ORIGINALLY PROPOSED AS ACTIVITY 2017-1)**

This activity provides the flexibility to set SCCHA payment standards higher than 110 percent of the Fair Market Rent (FMR), if necessary, without HUD approval. This activity will give SCCHA participants the ability to be more competitive in the high priced and volatile Santa Clara County rental market.

This activity is intended to increase the probability of participants securing a rental unit in a tight, high-cost rental market. Currently, Santa Clara County is experiencing a stabilizing of the rental market such that SCCHA has not needed to implement this activity. SCCHA may implement this activity when the Santa Clara County housing market experiences another surge in cost.

There are no changes to the activity's metrics, baselines, or benchmarks.

SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations during FY2019.

### **2018-1: STRENGTHENING PARTNERSHIPS THROUGH CAPACITY BUILDING**

This activity allows SCCHA to provide funds, not to surpass \$100,000, that can be utilized to support local service providers in building capacity, specifically geared toward service providers that offer family self-sufficiency services (i.e. job readiness programs, educational resources, etc.) to the community. The fund would allocate resources to designated partner agencies that make a commitment to providing services to individuals and families enrolled in SCCHA's pilot Focus Forward Program (FFP).

This will be implemented when SCCHA implements the FFP. SCCHA will revise the activity's metrics to include HUD standard metrics SS#5 and SS#8 at that time.

## Activities On Hold

### ACTIVITY 2010-5: ASSISTING OVER-INCOME FAMILIES RESIDING AT SCCHA-OWNED PROJECT-BASED VOUCHER PROPERTIES

This activity waives PBV regulations relating to preference for in-place families who reside in former public housing in order to continue to commit tax-exempt bonds and tax credits to the disposed public housing properties. Families with income below the PBV limit, but above the tax credit limit, will receive Section 8 voucher and relocation assistance. This activity helps maintain the affordability of units that would otherwise become unaffordable to very low income families by applying tax credits in unison with PBV assistance. It also increases housing choices for low-income families by preserving and improving the affordable housing stock in Santa Clara County.

Since this activity was implemented in 2011, SCCHA has had no need to use this waiver as no families have exceeded the income threshold. Only one public housing project (Deborah Drive) remains that could potentially benefit from this activity and there are no plans at this time to dispose of this property. Therefore, SCCHA has placed this activity on hold indefinitely but could re-implement when the last public housing project is eliminated.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

### ACTIVITY 2012-5: EXPAND TENANT SERVICES AT SCCHA- OR AFFILIATE-OWNED AFFORDABLE HOUSING PROPERTIES

This activity, which was implemented in FY2012, allowed SCCHA to use its MTW funding flexibility to expand its provision of programs and services for tenants living in SCCHA- or affiliate-owned non-Section 8/9 affordable rental properties. SCCHA anticipated that tenants would gain some or all of the necessary skills to address daily living requirements, maintain housing, and, for workable residents, possibly re-enter or move up in the work force.

SCCHA placed this activity on hold in FY2016 because the Agency did not (and does not expect to) utilize MTW funds for programs and services expansions at its non-Section 8/9 rental properties. Therefore, there is no implementation timeline. If non-MTW funding sources are exhausted, SCCHA will re-implement this activity.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

### ACTIVITY 2014-3: FREEZE ON CONTRACT RENT INCREASES

Implemented in FY2014, this activity imposed a freeze on any owner requested rent increases for one year effective September 2013 through August 2014. Effective September 1, 2014, SCCHA lifted the freeze and accepted owner requested rent increases again. This activity helped reduce costs by controlling increases to Housing Assistance Payments (HAP) while reducing labor



costs, but had negative effects on owner retention. At this time there are no plans to re-implement this activity. Subsequent freezes on owner requested rent increases are subject to SCCHA's Board of Commissioners' approval and are limited to a one-year term.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA does not anticipate any non-significant changes or modifications to this activity and its authorizations.

### Closed Out Activities

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<b>2009-3</b> Reduced Frequency of Inspections	Effective July, 2014, Public Housing Agencies (PHAs) can inspect units during the term of the Housing Assistance Payment (HAP) contract at least biennially instead of annually. There is no longer a need to waive HUD regulations to conduct biennial inspections.	This activity was closed out in <b>FY2015</b>
<b>2009-4</b> Timeline to Correct HQS Deficiencies	Handhelds are now utilized by the inspections team at every regularly scheduled inspection. These devices are capable of recording the non-life threatening deficiency directly into the newly implemented software, which then immediately generates the deficiency notification letter. There is no longer a lag time between the date of the inspection and the date of the letter.	This activity was closed out in <b>FY2012</b>
<b>2009-6</b> 20% Sample Inspections Annually for PBV Units	After the approval of this activity, HUD issued PIH Notice 2008-14, in which HUD stipulates that a PHA may now renew or extend Project-Based Certificate Housing Assistance Payment (HAP) contracts as Project-Based Voucher HAP contracts in accordance with the regulations governing the PBV program at 24 CFR Part 983. This activity was never implemented.	This activity was closed out in <b>FY2009</b>
<b>2009-7</b> Project-Based Unit Substitution	After the approval of this activity, HUD issued PIH Notice 2008-14, in which HUD stipulates that a PHA may now renew or extend Project-Based Certificate Housing Assistance Payment (HAP) contracts as Project-Based Voucher HAP contracts in accordance with the regulations governing the PBV program at 24 CFR Part 983. Therefore, this activity was never implemented.	This activity was closed out in <b>FY2009</b>
<b>2009-10</b> Selection of SCCHA-owned Public Housing Projects for PBV without Competition	SCCHA utilizes MTW Activity 2010-4, which allows the Agency to select any of its properties for PBV assistance without a competitive process, including public housing units. Therefore, this activity is no longer necessary.	This activity was closed out in <b>FY2015</b>
<b>2009-12</b> Adopt Investment Policies	SCCHA's Board of Commissioners annually adopts investment policies in accordance with the California Government Code (CGC) Sections 5922 and 53601. California law, which SCCHA cannot waive, is consistent with and, in fact, more restrictive than the provisions of federal regulations Section 6 (c) (4) of the 1937 Act and 24 CFR 982.156. Therefore, this activity was never implemented.	This activity was closed out in <b>FY2009</b>

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<b>2010-1</b> Eliminating 100% Excluded Income from the Income Calculation Process	With the publication of PIH Notice 2013-4, issued January 28, 2013, the verification and calculation of 100% excluded income is no longer required. Therefore, SCCHA eliminated this activity in FY2013. This activity saved labor time and costs.	This activity was closed out in <b>FY2013</b>
<b>2012-1</b> Create Standard Utility Allowance Schedule	Approved and implemented Activity 2014-4, simplifies the rent calculation method also includes the elimination of utility allowances. Because of Activity 2014-4, MTW Activity 2012-1 is no longer necessary and was closed out prior to implementation.	This activity was closed out in <b>FY2013</b>
<b>2015-1</b> Using UPCS or Local Inspection Standards to Determine Housing Quality Standards	On June 25, 2014, HUD published in the Federal Register that, effective July 1, 2014, "A PHA may comply with the biennial inspection requirement through reliance upon an inspection conducted for another housing assistance program. If a PHA relies on an alternative inspection to fulfill the biennial inspection requirement for a particular unit, then the PHA must identify the alternative standard in its administrative plan." Therefore, this activity was closed without implementation because HUD's directive superseded this activity.	This activity was closed out in <b>FY2015</b>

## V. MTW Sources And Uses of Funds

The information reported in Section V reflects the proposed budget for FY2019, pending approval by the SCCHA Board of Commissioners. At the time the FY2019 budget is approved, SCCHA will update Section V. and re-submit the Plan to HUD.

V.1.Plan.Sources and Uses of MTW Funds		
A. MTW Plan: Sources and Uses of MTW Funds		
Estimated Sources of MTW Funding for the Fiscal Year 2019-Traditional Activities		
PHAs shall provide the estimated sources and amounts of MTW funding by FDS line item.		
Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$19,224
70600	HUD PHA Operating Grants	\$341,796,046
70610	Capital Grants	\$1,400,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$500
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$149,230
70000	Total Revenue	\$343,365,000

**Note 1 - Source In Analysis :**

70600-HUD PHA Operating Grants \$341,796,046:

This FDS line represents the sum of the following: (1) Public Housing Operating Subsidy Income \$16,560 and (2) Section 8 MTW Admin Fee & HAP Earned \$341,779,486.

7120+71300+71310+71400+71500 - Other Income \$149,230:

This FDS line represents the sum of the following: (1) Land lease \$116,000, (2) Ground lease \$10,315 and (3) Other miscellaneous income \$22,915.

**Estimated Uses of MTW Funding for the Fiscal Year 2019-Traditional Activities**

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

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$22,597,536
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$179,171
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$47,698
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$221,198
95000 (95100+95200+95300+95500)	Total Protective Services	\$11,250
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$164,750
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$938,218
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$38,900
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	Housing Assistance Payments + HAP Portability-In	\$291,273,461
97400	Depreciation Expense	\$76,960
97500+97600+97700+97800	All Other Expenses	\$0
90000	Total Expenses	\$315,549,142

**Describe the Activities that Will Use Only MTW Single Fund Flexibility**

The MTW Agreement allows SCCCHA to combine public housing operating and capital funds, including development and Replacement Housing Factor (RHF)/Demolition and Disposition Transition Fund (DDTF) funds, provided under Section 9, and tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide funding source.

In FY2019, SCCCHA plans to continue to use MTW Single Fund Flexibility to pay for housing search services for participants who are experiencing challenges in finding a rental unit. The Agency also plans to pursue several projects led by our Information Technology Department, such as setting up a SharePoint system, upgrading our scanning systems and expanding e-signature capabilities. In addition, the Agency is in the initial stages of re-opening our waiting list; the opening will likely occur in FY2019.

**Note 2 - Source Out Analysis :**

**910000 - Total Operating - Administrative \$22,597,536:**

This FDS line represents operation , administrative and allocated overhead/support department costs.

**91810 - Allocated Overhead - \$0:**

Per conversation with HUD Analyst Bella Young in 2014, the Housing Authority is not utilizing the true COCC model. Therefore, we report our Indirect Allocation costs in FDS line 91900 (Other).

**96100-Total Insurance Premiums - \$164,750:**

This FDS line is consisted of \$42K liability insurance, \$122K worker's compensation insurance and \$1K for other insurance.

**96000 - Total Other General Expenses - \$938,218:**

This FDS line is comprised of (1) \$865K compensated (vacation/sick) absences, (2) \$67K admin fee port out and (3) \$2K payment In Lieu of Taxes, and (4) \$5K property tax.

**97300+97350 - Housing Assistance Payments + HAP Portability-In \$291,273,461:**

This FDS line represents the total HAP paid out.

HAP Portability -It is not budgeted in FY2019 as HACSC is absorbing all future incoming portability.

**Note 3 - Net Balance Analysis :**

For Fiscal Year 2019, the net reserve balance of \$27,815,858 (MTW funding) will be used to fund the following :

**I - Asset Management (Local Program)-Transfer of \$1,147,871:** In accordance with Non-Traditional MTW Activity 2012-4, established under Preservation Fund to provide funding for activities that preserve stable, quality affordable housing to people with low and moderate incomes. The transfer of \$1,147,871 is for subsidizing the expenditures of the Asset Management and Other Preservation Activities of qualifying low-income housing units of properties that are owned and operated by HACSC and/or affiliated entities.

**II- Activity 2012-3- Acquisition & Development Funds - \$1.4M:** HACSC anticipates the use of \$1.4M from Public Housing Capital Grant as an additional source to fund the construction cost of the Park Avenue (100 unit) development projects.

**III-Activity 2012-3-Acquisition & Development Funds - \$11.3M:** SCCHA anticipates the use of \$11.3M to fund a variety of development projects, including \$1M for construction of the Laurel Grove Apartments, \$3.7M for construction of the Park Avenue Apartments, \$2.1M for predevelopment of the Bellarmino Place and Alvarado Park projects, \$2.5M for East Santa Clara master planning project and \$2M for predevelopment on Buena Vista Mobile Home Park.

**IV - MTW Reserves - \$14M:** \$13.8M fiscal year reserves will be used for MTW activities outlined above and the remaining will be program reserves.

Finally, we request to add balance sheet FDS line items to report capital needs in the total uses of funds. In addition, we note that, in our opinion, depreciation expenses are not required in the Sources and Uses report because they are not a source of cash; but instead they should have a corresponding FDS line for capital expenditures.

V.2.Plan.Local Asset Management Plan	
B. MTW Plan: Local Asset Management Plan	
Is the PHA allocating costs within statute?	<input type="text" value="Yes"/> or <input type="text"/>
Is the PHA implementing a local asset management plan (LAMP)?	<input type="text"/> or <input type="text" value="No"/>
<p>If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.</p>	
Has the PHA provided a LAMP in the appendix?	<input type="text"/> or <input type="text" value="No"/>
<div style="background-color: yellow; text-align: center; padding: 5px;"> <b>SCCHA does not have a Local Asset Management Plan.</b> </div>	

## **VI. Administrative**

### **A. BOARD RESOLUTION ADOPTING THE 2019 ANNUAL MTW PLAN CERTIFICATION OF COMPLIANCE**

The Board Resolution approving the FY2019 MTW Plan is attached as Appendix One to this document.

### **B. PUBLIC REVIEW PROCESS FOR THE 2019 ANNUAL MTW PLAN**

SCCHA's FY2019 MTW Annual Plan was made available for public review from February 20, 2018 through March 21, 2018. In addition to SCCHA's regular Board of Commissioner's Meetings, where the public may comment on the MTW plan, two MTW Plan stakeholders' meetings were held between October 2017 and December 2017. A total of 7 people attended these stakeholder meetings. The public hearing for the plan was held on February 28, 2018. One written comment was received.

### **C. PLANNED OR ONGOING AGENCY-DIRECTED EVALUATIONS OF SCCHA'S MTW DEMONSTRATION**

In FY2019, SCCHA will continue to refine its approach to data gathering and monitoring of MTW activities and their impacts on stated goals and objectives. SCCHA is exploring a full-scale study and evaluation of its MTW activities.

### **D. ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT FOR MTW AND NON-MTW CAPITAL FUND GRANTS**

Statements are provided in Appendix Two.



## Appendix One: Resolution No. 18 - 02

### RESOLUTION NO. 18-02

**RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE  
SANTA CLARA COUNTY HOUSING AUTHORITY  
APPROVING SUBMISSION OF THE FY2019 MOVING TO WORK (MTW)  
ANNUAL PLAN TO US DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT**

**WHEREAS**, the Housing Authority of the County of Santa Clara, together with the Housing Authority of the City San José (collectively referred to as "**SCCHA**"), each entered into a ten-year Moving To Work (**MTW**) Agreement with the U.S. Department of Housing and Urban Development (**HUD**) in 2008, and since extended by HUD to June 30, 2028; and

**WHEREAS**, as a Moving to Work Agency, SCCHA is required to prepare and submit an Annual MTW Plan (**Plan**), to solicit comments and conduct a public hearing on the Plan, and to make certain certifications; and

**WHEREAS**, currently in its ninth year in the MTW Program, SCCHA has drafted its FY2019 Moving to Work Annual Plan, solicited public comment and conducted a public hearing on the Plan; and

**WHEREAS**, the Board has reviewed the Plan, comments received and required certifications;

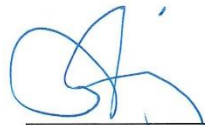
**NOW, THEREFORE, BE IT RESOLVED** that the Board of Commissioners of the Santa Clara County Housing Authority hereby:

1. Certifies the statements in the attached Certifications of Compliance with Regulations; and
2. Approves the Fiscal Year 2019 Moving to Work Annual Plan for SCCHA and the Housing Authority of the City of San José; and
3. Authorizes SCCHA to submit the Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both agencies.

**PASSED AND ADOPTED** by the Board of Commissioners of the Santa Clara County Housing Authority, State of California, on March 22, 2018, held at 505 W. Julian Street, City of San

Jose, State of California, upon motion from Commissioner William Anderson and seconded by Commissioner Denis O'Neal with the following vote:

AYES: Chair Loving, Vice Chair O'Neal, Commissioner Anderson, Commissioner Lorie,  
NAYS: Commissioner Espinoza-Howard, Commissioner Gardner & Commissioner  
ABSTAIN: Lawton  
ABSENT:

  
\_\_\_\_\_  
Jennifer Loving, Chair

ATTEST:  
  
\_\_\_\_\_  
Katherine Harasz, Secretary/Executive Director

APPROVED AS TO FORM AND LEGALITY:

  
\_\_\_\_\_  
Valerie Armento, General Counsel

Attachment: Certifications of Compliance with Regulations:  
Board Resolution to accompany the Annual Moving To Work Plan for  
the Santa Clara County Housing Authority (CA059) and  
the Housing Authority of the City of San José (CA056).

OMB Control Number: 2577-0216  
 Expiration Date: 5/31/2016

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

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
 Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

Attachment B

1

OMB Control Number: 2577-0216  
 Expiration Date: 5/31/2016

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Housing Authority of the City of San José  
 PHA Name

CA-056  
 PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Jennifer Loving  
 Name of Authorized Official

Chair, Board of Commissioners  
 Title

Signature

Date

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



OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

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

Attachment B

**Certifications of Compliance**

Annual Moving to Work Plan  
Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning July 1, 2018, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.
2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.
4. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
5. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
6. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
7. The PHA will affirmatively further fair housing by examining its programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Santa Clara County Housing Authority  
PHA Name

CA-059  
PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Jennifer Loving  
Name of Authorized Official

Chair, Board of Commissioners  
Title

Signature

Date

3/22/18

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



*Department of Housing*  
JACKY MORALES-FERRAND, DIRECTOR

February 26, 2018

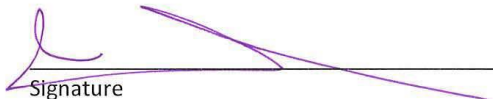
Re: FY2019 Moving to Work Plan Certification of Compliance

To the Santa Clara County Housing Authority:

I/we hereby certify that the Santa Clara County Housing Authority's Fiscal Year (FY) Moving to Work (MTW) Plan as drafted is consistent with the direction of the City of San José's 2015-2020 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2019 MTW Plan activities and objectives are consistent with the five-year goals of the City of San José's 2015-2020 Consolidated Plan in the efforts to:

1. Increase and preserve affordable housing opportunities.
2. Respond to homelessness and its impacts on the community.
3. Strengthen neighborhoods.
4. Promote fair housing.

  
\_\_\_\_\_  
Signature

Jacky Morales-Ferrand Director  
Print Name Title

March 22, 2018  
\_\_\_\_\_  
Date



DocuSign Envelope ID: D265A70E-A8EF-4031-A2EF-C42F9DE737B2

## County of Santa Clara

### Office of Supportive Housing

3180 Newberry Dr. Suite 100  
San Jose, CA 95118  
(408) 793-0550 Main  
(408) 266-0124 Fax



February 26, 2018

Katherine Harasz, Executive Director  
Santa Clara County Housing Authority  
505 W. Julian Street  
San Jose, CA 95110

#### **RE: FY2019 Moving to Work Plan Certification of Compliance**

Dear Mrs. Harasz:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2019 Moving to Work MTW Plan as drafted is consistent with the direction of the Urban County of Santa Clara 2015-2020 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2019 MTW Plan activities and objectives are consistent with the five-year goals of the Urban County of Santa Clara 2015-2020 Consolidated Plan in the efforts to:

1. Assist in the creation and preservation of affordable housing opportunities for low income and special needs households.
2. Support activities to end homelessness.
3. Support activities that provide community services to low income and special needs households.
4. Support activities that strengthen neighborhoods.
5. Promote fair housing choice.

Please feel free to contact me via email at [Consuelo.Hernandez@hhs.sccgov.org](mailto:Consuelo.Hernandez@hhs.sccgov.org) should you have any questions or require additional information.

Sincerely,

DocuSigned by:

*Consuelo Hernandez*

753313C0D93D1AC  
Consuelo Hernandez, AICP

Housing and Community Development Division Director

Board of Supervisors: Mike Wasserman, Dave Cortese, Ken Yeager, S. Joseph Simitian, Cindy Chavez  
County Executive: Jeffrey V. Smith



## Appendix Two: Capital Improvement Program Statements

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

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

<b>Part I: Summary</b>		<b>FFY of Grant:</b> <b>FFY of Grant Approval:</b>	
<b>PHA Name:</b> Santa Clara County Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No. CA01P05950117 Replacement Housing Factor Grant No. Date of CFFP:		
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Revised Annual Statement (Revision No: ) <input type="checkbox"/> Performance and Evaluation Report <input type="checkbox"/> Final Performance and Evaluation Report			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Actual Cost <sup>(1)</sup></b>	
		<b>Original</b>	<b>Obligated</b>
		<b>Revised <sup>(2)</sup></b>	<b>Expended</b>
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 20)(3)		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 20)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment-Nonexpendable		

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

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

<b>Part I: Summary</b>			
<b>PHA Name:</b> Santa Clara County Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No. CA01P05950117 Replacement Housing Factor Grant No. Date of CFFP:	<b>FFY of Grant:</b> <b>FFY of Grant Approval:</b>	
<b>Type of Grant</b> <input checked="" type="checkbox"/> <b>Original Annual Statement</b> <input type="checkbox"/> <b>Reserve for Disasters/Emergencies</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Revised Annual Statement (Revision No: )</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>	
		<b>Original</b>	<b>Obligated</b>
		<b>Revised (2)</b>	<b>Expended</b>
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling equipment		
14	1480 General Capital Fund		
15	1485 Demolition		
16	1492 Moving to Work Demonstration		
17	1495.1 Relocation Costs		
18a	1499 Development Activities (4)		
18ba	1501 Collateralization or Debt Service paid by the PHA		
19	9000 Collateralization or Debt Service paid via System of Direct Payment		
20	1502 Contingency (may not exceed 8% of line 20)		
21	Amount of Annual Grant: (sum of lines 2-20)		

(1) To be completed for the Performance and Evaluation Report

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

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

(4) RHF funds shall be include here

Form HUD-50075.1(4/2008)

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

<b>Part I: Summary</b>				
<b>PHA Name:</b> Santa Clara County Housing Authority	<b>Grant Type and Number</b> Capital Fund Program Grant No. CA01P05950117 Replacement Housing Factor Grant No. Date of CFFP:	<b>FFY of Grant:</b> <b>FFY of Grant Approval:</b>		
<b>Type of Grant</b> <input checked="" type="checkbox"/> <b>Original Annual Statement</b> <input type="checkbox"/> <b>Reserve for Disasters/Emergencies</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Revised Annual Statement (Revision No: )</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>				
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>		<b>Total Actual Cost <sup>(1)</sup></b>
		<b>Original</b>	<b>Revised <sup>(2)</sup></b>	<b>Obligated</b> <b>Expended</b>
22	Amount of line 21 Related to LBP Activities			
23	Amount of line 21 Related to Section 504 Activities			
24	Amount of line 21 Related to Security - Soft Costs			
25	Amount of line 21 Related to Security - Hard Costs			
26	Amount of line 21 Related to Energy Conservation Measures			

<b>Signature of Executive Director</b> /S/MEH804	<b>Date</b> 09/26/2017	<b>Signature of Public Housing Director</b>	<b>Date</b>
--	------------------------	---	-------------

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

Form HUD-50075.1(4/2008)

Part II: Supporting Pages						
PHA Name: Santa Clara County Housing Authority	Grant Type and Number Capital Fund Program Grant No. Replacement Housing Factor Grant No. CFFPY es/No:		Federal FFY of Grant:			
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost (1)		Status of Work
				Original	Revised	
Not associated with any specific development	Assignment of Funds to MTW BLI ( MTW (1492) )			\$660,388.00		
Total:				\$660,388.00		

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

Form HUD-50075.1(4/2008)

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

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

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

Form HUD-50075.1(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

<b>Part I: Summary</b>						
<b>PHA Name :</b> Santa Clara County Housing Authority		<b>Locality (City/County &amp; State)</b>				
<b>PHA Number:</b> CA059		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revised 5-Year Plan (Revision No: )				
<b>A.</b>	<b>Development Number and Name</b>	<b>Work Statement for Year 1 2017</b>	<b>Work Statement for Year 2 2018</b>	<b>Work Statement for Year 3 2019</b>	<b>Work Statement for Year 4 2020</b>	<b>Work Statement for Year 5 2021</b>
	AUTHORITY-WIDE	\$660,388.00	\$660,388.00	\$660,388.00	\$660,388.00	\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		1	2017	
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$660,388.00
ID0001	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		\$660,388.00
	Subtotal of Estimated Cost			\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		2018		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$660,388.00
ID0002	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		\$660,388.00
	Subtotal of Estimated Cost			\$660,388.00

Form HUD-50075.2(4/2008)



U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		2019		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$660,388.00
ID0003	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		\$660,388.00
	Subtotal of Estimated Cost			\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		4	2020	
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$660,388.00
ID0004	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		\$660,388.00
	Subtotal of Estimated Cost			\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year		5	2021	
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$660,388.00
ID0005	Assignment of Funds to MTW BLI(MTW (1492))	Assignment of Funds to MTW BLI		\$660,388.00
	Subtotal of Estimated Cost			\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 07/31/2017

**Capital Fund Program - Five-Year Action Plan**

<b>Part III: Supporting Pages- Management Needs Work Statements (\$)</b>		
<b>Work Statement for Year</b>	<b>1</b>	<b>2017</b>
	<b>Development Number/Name</b>	<b>Estimated Cost</b>
	<b>General Description of Major Work Categories</b>	
	Housing Authority Wide	
	Assignment of Funds to MTW BLI(MTW (1492))	\$660,388.00
	Subtotal of Estimated Cost	\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages- Management Needs Work Statements (\$)		
Work Statement for Year	2018	
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Assignment of Funds to MTW BLI(MTW (1492))		\$660,388.00
Subtotal of Estimated Cost		\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
2577-0274  
07/31/2017

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages- Management Needs Work Statements (\$)		
Work Statement for Year	3	2019
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Assignment of Funds to MTW BLI(MTW (1492))		\$660,388.00
Subtotal of Estimated Cost		\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 07/31/2017

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages- Management Needs Work Statements (\$)		
Work Statement for Year	4	2020
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Assignment of Funds to MTW BLI(MTW (1492))		\$660,388.00
Subtotal of Estimated Cost		\$660,388.00

Form HUD-50075.2(4/2008)

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 2577-0274  
 07/31/2017

Capital Fund Program - Five-Year Action Plan

Part III: Supporting Pages- Management Needs Work Statements (\$)		
Work Statement for Year	5	2021
Development Number/Name General Description of Major Work Categories		Estimated Cost
Housing Authority Wide		
Assignment of Funds to MTW BLI(MTW (1492))		\$660,388.00
Subtotal of Estimated Cost		\$660,388.00

Form HUD-50075.2(4/2008)