



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

OFFICE OF PUBLIC AND INDIAN HOUSING

November 2, 2021

Mr. Preston Prince
Executive Director
Santa Clara County Housing Authority
505 West Julian Street
San Jose, CA 95110-2300

Subject: Acceptance of the Santa Clara County Housing Authority and the Housing Authority of the City of San Jose FY2021 Annual Moving to Work Report

Dear Mr. Prince:

The Department of Housing and Urban Development (HUD) has completed its review of the Santa Clara County Housing Authority and the Housing Authority of the City of San Jose's (SCCHA/HACCSJ) FY2021 Annual Moving to Work (MTW) Report, which was submitted on September 28, 2021. I am writing to inform you that the SCCHA/HACCSJ Annual MTW Report is accepted.

Please note, while HUD is supportive of SCCHA/HACCSJ's efforts, this acceptance does not constitute an endorsement of any particular policies described in the Report. In providing assistance to families under programs covered by this Report and the corresponding Plan, SCCHA/HACCSJ must comply with the rules, standards and policies established in the Plan. Also, the approved Plan, accepted Report, and all required attachments and documents should be available for review and inspection at SCCHA/HACCSJ's principal office during normal business hours.

Please contact Autumn Gold, MTW Coordinator, at autumn.j.gold@hud.gov if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Nazzaro".

Marianne Nazzaro
Moving to Work Program Director
Office of Public Housing Investments

cc:
Gerard Windt, San Francisco Regional Office



FY2021 Moving to Work Annual Report

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

Submitted September 28, 2021

Moving to Work FY2021 Annual Report

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.

Serving residents throughout Santa Clara County, the heart of Silicon Valley and part of the greater San Francisco Bay Area, our clients include families with children, seniors, veterans, the disabled and the formerly homeless. The vast majority of our client households are extremely low-income (30% of area median income or less) with half of our assisted households occupied by seniors. **SCCHA currently assists over 19,000 households.**

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I. Introduction and Agency Goals

Purpose of this Report

The Santa Clara County Board of Supervisors established the Housing Authority of Santa Clara County, now Santa Clara County Housing Authority (SCCHA), in 1967. 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. SCCHA is an independent local government Agency whose 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.

SCCHA and the Housing Authority of the City of San José (HACSJ) entered into a 10-year agreement (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 at the beginning of 2008. This MTW Annual Report, submitted by SCCHA on behalf of both agencies, demonstrates the status of SCCHA's thirteenth full year as an MTW Agency during fiscal year (FY) 2021 (July 1, 2020 through June 30, 2021).

What is MTW?

The MTW program, established by Congress in 1996, is a federal demonstration program that links federal goals with locally-designed actions. Through the MTW program, select housing authorities are encouraged to propose and implement innovative changes to the way housing programs are administered in order to meet three broad federal goals:

DECREASE administrative costs and increase cost effectiveness in housing program operations;
PROMOTE participants' economic self-sufficiency, and
EXPAND participants' housing choices.

SCCHA strives to achieve these goals while assisting at least as many households and as diverse households (in terms of income level and family size) as before receiving MTW designation.

SCCHA's Short-Term Goals

The COVID-19 pandemic continued to impact SCCHA's work and operations during this fiscal year, however, SCCHA made progress on several short-term goals identified in the FY2021 MTW Annual Plan. The Agency closed to the public in March 2020 and remained closed through the fiscal year. SCCHA monitored the COVID-19 situation and complied with the requirements of the Santa Clara County Department of Public Health regarding staff in the office and public interactions. Staff adapted to

working with participants via phone calls, email, mail, and SCCHA's Tenant Portal. Some of the temporary COVID-19 policies still in place during FY2021 provided more time for applicants to submit social security and citizenship verification and provide briefings via mail and over the phone. Additionally, SCCHA implemented a technical amendment to the FY2021 MTW Annual Plan to extend the modified reexamination schedule of MTW Activity 2009-1 through June 30, 2023, providing extensions of up to 12 months in the reexamination schedule of participants.

The local rental market continued to be an obstacle to leasing up Housing Choice Vouchers (HCV) due to limited supply and high rents. Staff prioritized interim income decreases for participants and, through December 2020, made the effective date retroactive to the time the change was reported, which gave immediate relief to families. Throughout the fiscal year staff used HUD waivers to swiftly process regular and interim certifications based on tenant self-declaration rather than requiring confirmation from a third party. Voucher holders searching for housing benefited from automatic voucher extensions through December 2020. SCCHA referred all voucher holders requesting a voucher extension to a housing search services provider free of charge during the fiscal year.

After much careful planning, SCCHA launched a permanently open Section 8 interest list in December 2020. Interested persons and families can sign up for a chance to be selected for assistance by enrolling online. Enrollees first add their name to the Housing Choice Voucher interest list and then have the option to enroll on the site-based interest lists for the Project Based Voucher (PBV) and Moderate Rehabilitation Programs. Registrants can view property information including bedroom sizes and accessibility features, allowing them to decide which properties meet the needs of their family. When vouchers are available, SCCHA will select active registrants from the interest list via a lottery draw. SCCHA began drawing names from the site-based interest lists on March 30, 2021 and as of this report, there are almost 45,000 enrollees on the interest lists, and the number continues to grow.

Development funds provided under the County's Measure A bond go farther with PBV assistance provided by SCCHA. Through FY2021 SCCHA has awarded or conditionally awarded 1,797 PBVs across 40 projects to Measure A affordable housing developments. Two of these projects completed construction during the fiscal year, Leigh Avenue Senior Apartments and Shorebreeze Apartments, adding 94 more PBV units to the local supply. Despite some COVID-related supply delays, construction on many of the projects continues with most of the construction expected to be complete by FY2023.

SCCHA's Tenant Portal, launched in 2019, continued to allow participants to communicate with Agency staff, especially as the Agency remained closed to the public due to COVID-19. Participants conveniently access information regarding their Section 8 assistance, rent portion, communicate changes in income or family composition, and submit paperwork directly to their caseworker. This fiscal year saw an increase of 3,000 Tenant Portal users bringing the total number of users to over 5,600.

Progress continued on the development of SCCHA's "Focus Forward" pilot program (Activity 2014-1a and Activity 2014-1b), originally proposed in FY2014. The Focus Forward program was separated into two different but related activities in the FY2018 plan: case management and ongoing program incentives (Activity 2014-1a) and time-limited vouchers and a tiered rent structure (Activity 2014-1b). In the FY2019 plan, SCCHA re-proposed Activity 2014-1b to limit the portability of Focus Forward participants. In FY2021, SCCHA continued working with the consultant to develop the documents, materials, policies, and procedures for the Focus Forward program and prepared to issue an RFP for

the case management services. SCCHA expects completion of work on the development of the Focus Forward program in FY2022.

During the fiscal year, the Housing Department Policy team ensured staff were up to date with changing COVID-19 policies and created procedures for staff based on the policy changes. SCCHA's Compliance team monitored and evaluated staff performance in the administration of the Agency's federal programs helping identify areas where additional training or better written procedures are needed. SCCHA's Training and Outreach team worked to provide comprehensive training to new and experienced staff on the work processes required to administer the Agency's different voucher programs.

In FY2021, SCCHA continued its affordable housing development work in Santa Clara County. Specifically, SCCHA continued design development and financing plans for its Bellarmino Place Family Housing and Alvarado Park Senior Housing developments. These developments will provide a combined 204 units of affordable housing on a site SCCHA previously acquired for \$12 million in MTW funds. SCCHA also further refined its schematic design for the East Santa Clara developments, a site acquired by SCCHA for \$30 million in MTW funds. The plan no longer includes a new office and the space previously dedicated to the office was repurposed for additional affordable housing. The 5.3-acre site is now planned to include six affordable housing developments, providing approximately 660 affordable homes. Finally, SCCHA commenced on the first phase of renovations at the Buena Vista Mobile Home Park. Work included the replacement of 20 homes and associated infrastructure upgrades.

In May 2021 SCCHA was awarded 1,011 Emergency Housing Vouchers (EHVs). At the end of June HUD awarded an additional 22 vouchers, bringing the total to 1,033. Through the end of the fiscal year and beyond staff has worked closely with the local Continuum of Care to execute the required MOU and a Contract for Services, utilizing the existing case management relationships the Continuum of Care has with local agencies. Referrals will come from the Continuum of Care in FY2022.

II. General SCCHA Operating Information

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

Tenant-based vouchers that the MTW PHA project-based for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) was in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Agrihood Senior Apartments	54	54	Committed	No	New construction senior project consisting of 165 total units. 109 of the units will be affordable and of those, 54 will be supported with PBVs for seniors.
750 W. San Carlos	40	0	Committed	No	New construction family project, consisting of 80 total units. 40 PBVs will support the project,
Vela (Alum Rock Family)	29	29	Committed	No	New construction family project, consisting of 87 total units. 29 PBVs will support the project, directed towards the homeless and those with special needs.
Charities Blossom Hill	49	49	Committed	No	New construction senior project, consisting of 147 total units. 49 PBVs will support the project, directed towards seniors with special needs.
Calabazas (Corvin)	80	0	Committed	No	New construction family project consisting of 136 units. 80 PBVs will support the project, directed toward the homeless and those with special needs.
Page Street	27	27	Committed	No	New construction family project consisting of 81 total units. 27 PBVs will support the project, directed toward the homeless and those with special needs.
Sango Court	40	0	Committed	No	New construction family project consisting of 101 total units. 40 PBVs will support the project, directed toward the homeless and those with special needs.
Auzerais	64	0	Committed	No	New construction family project consisting of 128 total units. 64 PBVs will support the project, directed toward the homeless and those with special needs.

Gallup & Mesa	23	23	Committed	No	New construction family project consisting of 45 total units. 23 PBVs will support the project, directed toward the homeless and those with special needs
1020 N 4 th Street	0	93	Committed	No	New construction project consisting of 94 total units. All 94 units will be supported with PBVs directed toward affordable units for chronically homeless seniors.
406		275	Planned/Actual Total Vouchers Newly Project-Based		

* Figures in the "Planned" column should match the corresponding Annual MTW Plan.

** Select "Status at the End of Plan Year" from: Committed, Leased/Issued

Please describe differences between the Planned and Actual Number of Vouchers Newly Project-Based:

Three projects anticipated in the Plan did not complete the pre- AHAP steps by the end of the Plan Year. Those projects are: 750 West San Carlos, Sango Court, and Auzeais. Calabazas (Corvin) was erroneously included in Section II(A)(iii), Actual New Project Based Vouchers, of the FY2021 Plan and should have been in Section II(A)(iv), Actual Existing Project Based Vouchers. Additionally, at the time the FY2021 Plan was drafted, the Agency did not anticipate project basing the 93 units at 4th and Younger.

ii. **Actual Existing Project Based Vouchers**

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP was in place by the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
2275 Ellena Dr	1	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
2287 Pasetta Dr	1	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
Anne Way Residence	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Blossom Hill Residence	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF THE PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Calabazas (Corvin)	80	0	Committed	No	New construction family project consisting of 136 units. 80 PBVs will support the project, directed toward the homeless and those with special needs.
Carroll Inn	20	20	Leased/Issued	No	Family project consisting of 121 Studio units. PBV units are for disabled persons.
Casa De Novo	27	27	Leased/Issued	No	Family project consisting of 56 units. 27 units provide long-term supportive housing, 29 units operate as a hotel offering temporary supportive housing. PBV units are for chronically homeless families.
Casa Feliz Studios	6	6	Leased/Issued	No	Family project consisting of 60 studio units. PBV units are for chronically homeless families.
Connell Apartments	5	5	Leased/Issued	No	Family project consisting of 28 units (1 studio, 17 1-bedroom, and 10 2-bedroom). PBV units (2-Bedroom) are for families.
Corde Terra Senior Apartments	199	199	Leased/Issued	No	Senior project consisting of 199 1-bedroom units. PBV units are for persons aged 55 years and over.
Corinthian House	6	6	Leased/Issued	No	Senior project consisting of 102 units (62 studios and 40 1-bedroom). PBV units (1-bedroom) are for persons aged 62 years and over.
Country Hills	37	37	Leased/Issued	No	Family project consisting of 152 units (40 studio, 64 1-bedroom, and 48 2-bedroom). PBV units (8 studio, 16 1-bedroom, and 13 2-Bedroom) are for families.
Crescent Terrace	20	20	Leased/Issued	No	Senior project consisting of 48 1-bedroom units. PBV units are for persons aged 62 years and over.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Crossings on Monterey	20	20	Leased/Issued	No	New construction project consisting of 38 units (6 1-bedroom, 17 2-bedroom, and 15 3-bedroom units) for tenants. 20 PBVs are reserved for the chronically homeless.
Curtner SROs	6	6	Leased/Issued	No	Senior project consisting of 6 SRO units. PBV units are for persons aged 62 years and over.
Cypress Gardens Senior Apartments	124	124	Leased/Issued	No	Senior project consisting of 124 units (111 1-bedroom and 13 2-bedroom). PBV units are for persons aged 55 years and over.
Dent Avenue Apartments	4	4	Leased/Issued	No	Family project consisting of 24 units (6 studio, 12 1-bedroom, and 5 2-bedroom). PBV units (2 SRO and 2 2-bedroom) are for families.
Donner Lofts – CHDR	20	20	Leased/Issued	No	Family project consisting of 101 units (92 studio and 9 1-bedroom). PBV units are for chronically homeless families.
Eagle Park (formerly 1701 ECR)	16	16	Leased/Issued	No	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).
Edwina Benner Plaza	23	23	Leased/Issued	No	Family, new construction, project, consisting of 65 units for residents. 23 of those units will have PBVs attached, with 13 for Special Needs Direct Referral program and 10 for families at risk of homelessness.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Eklund Gardens I Apartments	9	9	Leased/Issued	No	Family project consisting of 10 2-bedroom units. PBV units are for families.
Eklund Gardens II Apartments	6	6	Leased/Issued	No	Family project consisting of 6 3-bedroom units. PBV units are for families.
Emerson North	1	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Emerson South	1	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Fair Oaks Senior Plaza	93	93	Leased/Issued	No	Senior project consisting of 124 units (11 1-bedroom and 14 2-bedroom). PBV units (80 1-bedroom and 13 2-bedroom) are for persons aged 62 years and over.
Fairlands SRO's	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Ferne	1	1	Leased/Issued	No	Family project consisting of 16 2-bedroom units. PBV unit is for families.
Fuji Towers	104	104	Leased/Issued	No	Senior project consisting of 124 units (72 studio and 68 1-bedroom). PBV units (53 studio and 51 1-bedroom) are for persons aged 62 years and over.
Gish Apartments	6	6	Leased/Issued	No	Family project consisting of 35 units (9 studio, 14 2-bedroom, and 12 3-bedroom units). PBV units (3 studio and 3 2-bedroom) are for disabled families.
Hillview Court	0	66	Issued/Leased	No	Rehabilitated motel, renovated into studio apartments for those experiencing homelessness and at-risk of homelessness. 66 of the 134 units are supported with PBVs

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Homestead SROs	4	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
Julian Gardens	9	9	Leased/Issued	No	Family project with 9 3-bedroom PBV units.
Kings Crossing Apartments	25	25	Leased/Issued	No	Family project consisting of 94 units (34 1-bedroom, 34 2-bedroom, and 26 3-bedroom units). PBV units (9 1-bedroom, 12 2-bedroom, and 4 3-bedroom) are for chronically homeless families.
Klee/Offenbach SROs	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Laurel Grove Family Apartments	81	81	Leased/Issued	No	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.
Leigh Avenue Senior Apartments	63	63	Committed	No	New construction project consisting of 63 1-bedroom units for chronically homeless seniors.
Lenzen Gardens Senior Apartments	93	93	Leased/Issued	No	Senior project consisting of 94 units (89 1-bedroom and 5 2-bedroom). PBV units (89 1-bedroom and 4 2-bedroom) are for persons aged 62 years and over.
Llewellyn Residence	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Lucretia Gardens	16	16	Leased/Issued	No	Family project consisting of 16 3-bedroom units. PBV units are for families.
Maryce Freelen Place	18	18	Leased/Issued	No	Family project consisting of 74 units (24 1-bedroom, 26 2-bedroom, and 24 3-bedroom units). PBV units (2 1-bedroom, 6 2-bedroom, and 10 3-bedroom units) are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Met South	10	10	Leased/Issued	No	Family, new construction project, consisting of 31 units (9 studios, 8 1-bedroom, 5 2-bedroom, and 9 3-bedroom). PBV units are for seniors and large families.
Miramar Apartments	16	16	Leased/Issued	No	Family project consisting of 16 units (8 1-bedroom and 8 2-bedroom). PBV units are for families.
Monterey Gateway	37	37	Leased/Issued	No	New construction project consisting of 74 units (64 1-bedroom and 10 2-bedroom units) for senior tenants. 37 PBVs are reserved for chronically homeless senior families.
Monticelli Apartments	23	23	Leased/Issued	No	Family and Senior project consisting of 52 units (25 1-bedroom and 27 3-bedroom). 14 1-bedroom PBV units are for persons aged 62 and over, and 9 3-bedroom PBV units are for families.
Morgan Hill Family – Scattered Site (Palomino)	18	18	Leased/Issued	No	Family, new construction project, consisting of 18 total units. PBVs units are for large families, those with special needs, and chronically homeless families.
Morgan Hill Family – Scattered Site (Overo)	8	8	Leased/Issued	No	Family, new construction project, consisting of 8 units. PBVs are for those at risk of homelessness.
Morgan Hill Family – Scattered Site (Tobiano)	14	14	Leased/Issued	No	Family, new construction project, consisting of 14 total units. PBVs units are for large families, families at risk of homelessness, and chronically homeless families.
Moulton Plaza	8	8	Leased/Issued	No	Family project consisting of 66 units (30 1-bedroom, 26 2-bedroom, and 10 3-bedroom). PBV units (2 2-bedroom, and 6 3-bedroom) are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
North San Pedro Apartments	60	60	Committed	No	New construction project consisting of 134 units for tenants (118 studios and 16 1-bedroom units). 60 PBVs are reserved for chronically homeless individuals and 49 are HUD-VASH PBV units (VASH PBV units not reflected in this section).
Onizuka Crossing - CHDR	13	13	Leased/Issued	No	Family, new construction project, consisting of 58 units (27 1-bedroom, 11 2-bedroom, and 20 3-bedroom). PBV units (13 1-bedroom) are for chronically homeless families.
Opportunity Center	55	55	Leased/Issued	No	Family project consisting of 88 units (70 studios, 12 1-bedroom, and 6 2-bedroom). PBV units (48 studio, 3 1-bedroom, and 4 2-bedroom) are for chronically homeless families.
Park Avenue Senior Housing	99	99	Leased/Issued	No	Senior, new construction, 94 1-bedroom, 5 2-bedroom. PBV units are for persons aged 55 years and over.
Parkside Studios	7	7	Leased/Issued	No	Family project consisting of 59 units (58 studios and 1 1-bedroom). PBV units (7 studios) are for chronically homeless families.
Parkview Senior Apartments	24	24	Leased/Issued	No	Senior project consisting of 140 1-bedroom units. PBV (24 1-bedroom) units are for persons aged 55 years and over.
Poco Way Apartments	10	10	Leased/Issued	No	Family project consisting of 130 units (14 1-bedroom, 54 2-bedroom, 54 3-bedroom and 8 3-bedroom units). PBV units (3 1-bedroom, 3 2-bedroom, and 4 3-bedroom) are for families.
Pollard SROs	5	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Quetzal Gardens	32	32	Committed	No	New construction of 70 units (1,2,3 bd, get counts). 28 PBVs for Chronically homeless families and 4 for large families
Renascent Place	160	160	Leased/Issued	No	New construction project of 160 PBV units for chronically homeless families
Rincon Gardens Senior Apartments	198	198	Leased/Issued	No	Senior project consisting of 200 units (190 1-bedroom and 10 2-bedroom). PBV units (189 1-bedroom and 9 2-bedroom) are for persons aged 55 years and over.
San Antonio Place	30	30	Leased/Issued	No	Family project consisting of 120 units (118 studio, 1 1-bedroom, and 1 2-bedroom). 30 studio PBV units are for families
San Veron Park Apartments	6	6	Leased/Issued	No	Family project consisting of 32 units (10 2-bedroom, 15 3-bedroom, and 7 4-bedroom). PBV units (3 2-bedroom, 2 3-bedroom, and 1 4-bedroom) are for families
Santa Familia	13	13	Leased/Issued	No	Family project consisting of 79 units (30 1-bedroom, 23 2-bedroom, and 26 3-bedroom). PBV units (4 1-bedroom, 4 2-bedroom, and 5 3-bedroom) are for families
Second Street Studios	134	134	Leased/Issued	No	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.
Shorebreeze	20	20	Leased/Issued	No	New construction project consisting of 62 units for tenants (21 studios, 21 1-bedroom units, 8 2-bedroom units, and 12 3-bedroom units. 20 PBV units are reserved for families who are at risk of homelessness.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Sobrato Apartments	0	34	Leased/Issued	No	60-unit project consisting of 15 PBV units (7 2-bedroom and 8 3-bedroom) for families at risk of homelessness and 19 2-bedroom PBV units for chronically homeless families.
Stevenson House	9	9	Leased/Issued	No	Senior project consisting of 120 studio and 1-bedroom units. PBV units (6 studio and 3 1-bedroom) are for persons aged 62 years and over.
Sunset Gardens Senior Apartments	74	74	Leased/Issued	No	Senior project consisting of 75 units (70 1-bedroom and 5 2-bedroom). PBV units (70 1-bedroom and 4 2-bedroom) are for persons aged 55 years and over.
Timberwood Apartments	20	20	Leased/Issued	No	Family project consisting of 286 units (84 studios, 164 1-bedroom, and 38 2-bedroom). PBV units (6 studio, 6 1-bedroom, and 8 2-bedroom) are for families.
Tully Gardens/Markham	20	20	Leased/Issued	No	152-unit family project with 10 SRO PBV units for disabled families and 10 PBV units for chronically homeless families.
Tyrella Gardens Apartments	13	13	Leased/Issued	No	Family project consisting of 56 units (12 1-bedroom, 32 2-bedroom, and 12 3-bedroom). PBV units (4 1-bedroom, 6 2-bedroom, and 3 3-bedroom) are for families.
Ventura	1	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units are for families.
Ventura Apartments	1	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS		STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
	Planned*	Actual			
Veranda	6	6	Leased/Issued	No	New construction project consisting of 18 studio units for senior tenants. 6 PBVs are reserved for chronically homeless senior families.
Village at Willow Glen	20	20	Leased/Issued	No	Senior project consisting of 133 units. PBV units (17 1-bedroom and 3 2-bedroom) are for persons aged 55 years and over.
Villas on The Park	83	83	Leased/Issued	No	83 studio units for chronically homeless individuals
Waldo	3	3	Leased/Issued	No	Family project consisting of six 1- and 2-bedroom units. Three 1-bedroom PBV units are for families.
Westwood Ambassador	11	11	Leased/Issued	Yes	Rehabilitated 42 unit apartment complex with 11 1 and 2-bedroom PBV units for families.
Wheeler Manor	10	10	Leased/Issued	No	Senior project consisting of 111 1-bedroom units. PBV units (10 1-bedroom) are for persons aged 62 years and over.
Wolfe SROs	4	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
2445		2465	Planned/Actual Total Existing Project-Based Vouchers		

* Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

** Select "Status at the End of Plan Year" from: Committed, Leased/Issued

Please describe differences between the Planned and Actual Existing Number of Vouchers Project-Based:

Calabazas (Corvin) (80 units) was erroneously included in Section II(A)(iii), Actual New Project Based Vouchers, of the FY2021 Plan and should have been in Section II(A)(iv), Actual Existing Project Based Vouchers. Hillview Court (66 units) was not anticipated in the FY2021 MTW Plan. Sobrato Apartments (34 units) was inadvertently left out of the FY2021 Plan as Leased/Issued.

iii. **Actual Other Changes to MTW Housing Stock in the Plan Year**

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR

Two residents of the Buena Vista Mobile Home Park exercised their right to take the early voluntary relocation settlement agreement. No new residents are being permitted to occupy the vacant coach pads. The following affordable housing project have been added into the MTW portfolio (from last year): El Parador with 125 units and DeRose Gardens Apartments with 74 affordable units.

iv. **General Description of All Actual Capital Expenditures During the Plan Year**

Narrative general description of all actual capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL ACTUAL CAPITAL EXPENDITURES DURING THE PLAN YEAR

The agency has worked on several projects including \$200,000 at El Parador Apartments for new HVAC system, \$200,000 at Helzer Court Apartments for repairing leaking garage walls, \$150,000 for Buena Vista Mobile Home Park for operations and maintenance to stabilize the park and approximately, \$350,000 at San Pedro garden for rehabilitation work including HVAC repair and roof upgrades.

SCCHA also spent money on development and rehabilitation as follows:

- \$500,000 on Bellarmino Place Family Housing;
- \$500,000 on Alvarado Park Senior Housing for predevelopment work;
- \$987,343 on the East Santa Clara Developments for schematic design and entitlement work
- \$3.25M on the Buena Vista Mobile Home Park to plan and purchase 20 new homes

B. LEASING INFORMATION

i. Actual Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA actually served at the end of the Plan Year.

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS SERVED**	
	Planned^^	Actual	Planned^^	Actual
MTW Public Housing Units Leased	48	48	4	4
MTW Housing Choice Vouchers (HCV) Utilized	201,300	187,212	16,775	15,854
Local, Non-Traditional: Tenant-Based	0	48	0	4
Local, Non-Traditional: Property-Based	14,100	10,884	1,175	907
Local, Non-Traditional: Homeownership	0	0	0	0
Planned/Actual Totals	215,448	198,192	17,954	16,769

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA planned to have leased/occupied in each category throughout the full Plan Year (as shown in the Annual MTW Plan).

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

Please describe any differences between the planned and actual households served:

The number of Actual Households Served has increased since FY2020 and the agency continues to work toward increasing voucher utilization as evidenced by exhausting the 2006 Waiting List. The Local, Non-Traditional: Property Based Planned units anticipated using MTW funds on 2 projects which did not end up using MTW funds this FY. Local, Non-Traditional: Tenant-Based increased because of a new MTW Activity.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	NUMBER OF UNIT MONTHS OCCUPIED/LEASED*		NUMBER OF HOUSEHOLDS TO BE SERVED*	
		Planned^^	Actual	Planned^^	Actual
Tenant-Based	Interim Housing/ Activity 2020-2	0	48	0	4
Property-Based	Create Affordable Housing Preservation Fund for Affiliate-Owned Properties / Activity 2012-4	14,100	10,884	1,175	907
Homeownership	N/A	0	0	0	0
Planned/Actual Totals		14,100	10,932	1,175	911

* The sum of the figures provided should match the totals provided for each Local, Non-Traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

^^ Figures and text in the "Planned" column should match the corresponding Annual MTW Plan.

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	0	0

ii. **Discussion of Any Actual Issues/Solutions Related to Leasing**

Discussion of any actual issues and solutions utilized in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	SCCHA did not have any issues related to the leasing of these units.
MTW Housing Choice Voucher	Santa Clara County continues to be one of the nation's most expensive rental markets. Additionally, COVID-19 and the local shelter-in-place orders slowed down lease up during the fiscal year. To support voucher holders searching for units, SCCHA has increased landlord outreach and used its existing landlord incentives to attract and retain landlords in the HCV program. SCCHA continues its efforts to expand the availability of affordable housing in the area by awarding PBVs and through use of both the affordable housing development and the affordable housing preservations funds.
Local, Non-Traditional	SCCHA did not have any issues related to leasing of these units.

C. WAITING LIST INFORMATION

i. **Actual Waiting List Information**

Snapshot information on the actual status of MTW waiting lists at the end of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Federal MTW Public Housing Units	Site Based	636	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific	45000*	Open	Yes
Project-Based Local, Non-Traditional MTW Housing Assistance Program	Site Based	9,362	Partially open	Yes

* SCCHA's Interest List opened in December 2020. Small waiting lists are created by randomly drawing active applicants from its interest lists, as vouchers are available or PBV projects come online.

Please describe any duplication of applicants across waiting lists:

Applicants may sign up for both tenant-based assistance on its interest list and project-based assistance on any of the site-based interest lists.

ii. **Actual Changes to Waiting List in the Plan Year**

Please describe any actual changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Federal MTW Public Housing Units	None
Federal MTW Housing Choice Voucher Program	In December 2020 SCCHA opened a new Interest List. The Interest List will remain open and names will be drawn in a lottery system as vouchers become available or new PBV units come online.
Project-Based Local, Non-Traditional MTW Housing Assistance Program	The waiting lists at Bendorf Drive Apartments, Blossom River Apartments, Clarendon Street Apartments, Morrone Gardens Apartments, Pinmore Garden Apartments, El Parador Apartments and DeRose Apartments were opened during the plan year.

D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. **75% of Families Assisted Are Very Low Income**

HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW PHA are very low income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA should provide data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based"; "Local, Non-Traditional: Property-Based"; and "Local, Non-Traditional: Homeownership" categories. Do not include households reported in the "Local, Non-Traditional Services Only" category.

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	3
49%-30% Area Median Income	35
Below 30% Area Median Income	43
Total Local, Non-Traditional Households Admitted	81

ii. **Maintain Comparable Mix**

HUD will verify compliance with the statutory requirement that MTW PHAs continue to serve a comparable mix of families by family size by first assessing a baseline mix of family sizes served by the MTW PHA prior to entry into the MTW demonstration (or the closest date with available data) and compare that to the current mix of family sizes served during the Plan Year.

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)					
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	418	5,109	N/A	5,527	33%
2 Person	107	3,767	N/A	3,874	23%
3 Person	12	2,919	N/A	2,931	18%
4 Person	13	2,152	N/A	2,165	13%
5 Person	3	1,181	N/A	1,184	7%
6+ Person	2	914	N/A	916	6%
TOTAL	555	16,042	N/A	16,597	100%

* "Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA. An example of an acceptable "Non-MTW Adjustment" would include demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below.

Please describe the justification for any "Non-MTW Adjustments" given above:

N/A

MIX OF FAMILY SIZES SERVED (in Plan Year)				
FAMILY SIZE	BASELINE MIX PERCENTAGE**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	33%	7,482	46%	13%
2 Person	23%	3,864	24%	1%
3 Person	18%	2,028	12%	-6%
4 Person	13%	1,286	8%	-5%
5 Person	7%	906	6%	-1%
6+ Person	6%	666	4%	-2%
TOTAL	100%	16,232	100%	

** The "Baseline Mix Percentage" figures given in the "Mix of Family Sizes Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)" table.

^ The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.

^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

Please describe the justification for any variances of more than 5% between the Plan Year and Baseline Year:

Over half the households housed under vouchers issued in FY2021 were issued as 1-bedroom vouchers to families with a single household member. Fifty percent of the 1-bedroom vouchers went to people from the waiting list and half of those families have an elderly head of household or family member. SCCCHA exhausted its 2006 waiting list in FY2021. In 2006, when families signed up on the waiting list, they may have had children at home who since moved out, leaving a solo family member at the time they were offered a voucher in FY2021. Approximately 80% of SCCCHA's PBV portfolio is SRO, studio, or 1-bedroom units.

iii. Number of Households Transitioned to Self-Sufficiency in the Plan Year

Number of households, across MTW activities, that were transitioned to the MTW PHA's local definition of self-sufficiency during the Plan Year.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF SUFFICIENCY
Reduced Frequency of Tenant Reexaminations/2009-1	174	Households who leave assistance voluntarily, or after 180 days of zero Housing Assistance Payments
Expand Tenant Services at SCCHA- or Affiliate-owned Affordable Housing Properties / 2012-5	0	SCCHA did not use this activity during the reporting year
	0	(Households Duplicated Across MTW Activities)
	174	
Total Households Transitioned to Self Sufficiency		

* Figures should match the outcome reported where metric SS#8 is used in Section IV of this Annual MTW Report.

III. Proposed MTW Activities: HUD Approval Requested

All proposed MTW activities that were granted approval by HUD are reported in Section IV as 'Approved Activities'.

IV. Approved MTW Activities: HUD Approval Previously Granted

To date, SCCHA has received HUD approval for 53 activities. Of these, ten 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.

A. Implemented Activities

ACTIVITY 2009-1: REDUCED FREQUENCY OF TENANT REEXAMINATIONS

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2009

AMENDED: FY2016, FY2020, FY2021

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to reduce the frequency of reexaminations of family income and composition from annually to once every three years for households with only fixed income sources and once every two years for all other households. SCCHA amended and re-proposed Activity 2009-1 in FY2015 to include its remaining four public housing units under the activity. This activity was re-proposed as a technical amendment again in FY2021, extending the amendment from FY2020 in response to the COVID-19 pandemic. The amendment reduces the frequency of regular reexaminations to every 4 years for households with only fixed income sources, and 3 years for all other households. The FY2021 Amendment extends this modified Activity through FY2023 (ending June 30, 2023).

IMPACT OF MTW ACTIVITY

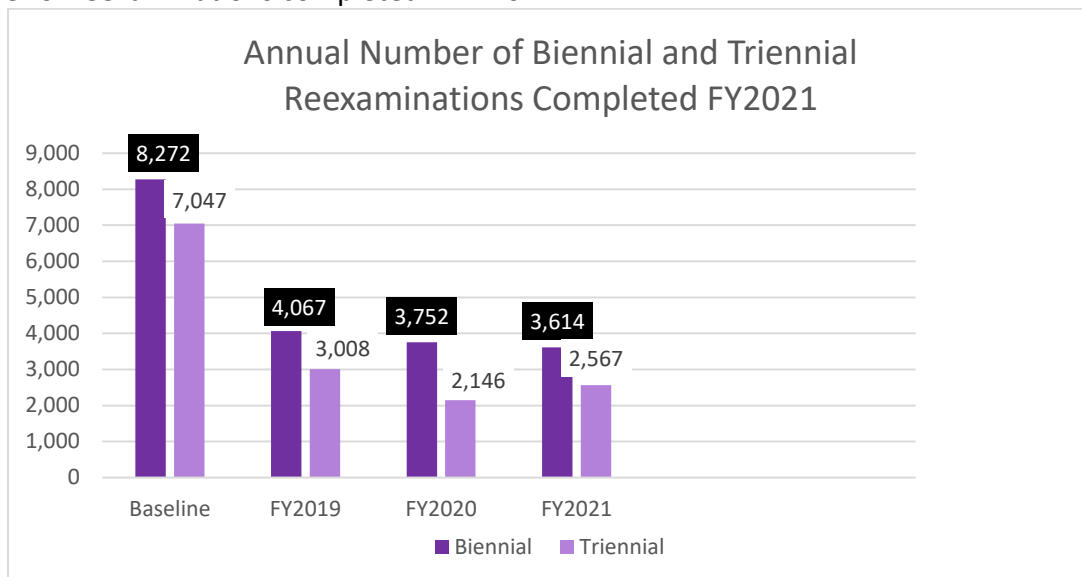
The labor hours saved as a result of this activity allows SCCHA to improve the assistance it provides to clients, stakeholders and partners, as SCCHA continually works to enhance and refine program efficiencies.

This activity also promotes economic self-sufficiency by creating an incentive for families to seek and retain employment. SCCHA's current interim reexamination policy allows families to retain the savings resulting from income increases between regular reexaminations. SCCHA will not apply the higher income, resulting in an increased tenant rent portion, until the next scheduled reexamination. Therefore, families have a longer period between regular reexaminations to enjoy the benefits of higher income.

UPDATE ON MTW ACTIVITY

In FY2021, 6,181 biennial and triennial reexaminations were completed, which demonstrates a 60% reduction from the baseline year. Although this activity is the basis for the reduction in completed regular reexaminations, SCCHA since becoming an MTW agency experienced a decline in voucher utilization due to the high cost rental market and low rental unit vacancy rate in Santa Clara County. The dynamic rental market has reduced the success of SCCHA voucher holders and has contributed to the slow attrition of the voucher utilization rate. The lower voucher utilization rate is an additional explanation for the higher than expected reduction in completed reexaminations.

This activity was re-proposed as a technical amendment in FY2020, in response to the COVID-19 pandemic. The amendment reduces the frequency of regular reexaminations to every 4 years for households with only fixed income sources, and 3 years for all other households. SCCHA amended its FY2021 MTW Annual Plan to further extend this modified Activity through FY2023 (ending June 30, 2023). Due to this modification, regular reexaminations which were previously designated as “biennial” are scheduled to take place once every three years, and regular reexaminations which were previously designated as “triennial” are scheduled to take place once every four years. This modification to the activity is also partially responsible for the low number of reexaminations completed in FY2021.



SCCHA spent 25,282 labor hours when processing regular reexaminations in FY2021 which resulted in a labor savings of 36,647 hours as compared to the baseline year. The potential savings resulting from this reduction of workload is valued at approximately \$1,145,032 in total labor cost savings when compared to the established baseline. The baseline and benchmark total cost of task in dollars in the table below have been updated to reflect labor costs in FY2021.

IMPACT OF RENT REFORM ACTIVITY

This activity qualifies as a Rent Reform Initiative because it involves a change in the rent calculation method.

In FY2021, no participants requested a hardship exemption from this activity. However, if a hardship request is received it will be handled on a case by case basis.

STANDARD HUD METRICS

Activity 2009-1: Reduced Frequency of Tenant Reexaminations				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$1,934,982	\$967,491	\$789,949	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	61,930	30,965	25,282	Yes
CE #5: Increase in Tenant Rent Share				
Tenant rent share in dollars (increase).	\$8,065,166	\$8,065,166*	\$6,028,689	No
SS #1: Increase in Household Income				
Average earned income of households affected by this policy in dollars (increase).	\$23,021	\$23,021**	\$30,988	Yes
SS # 3: Increase in Positive Outcomes in Employment Status				
Number of Head of Households employed.	4,317	4,317*	3,235	No
Number of Head of Households employed full-time.	N/A***			
Number of Head of Households employed part-time.				
Number of Head of Households enrolled in an educational program.	N/A****			
Number of Head of Households enrolled in job training program.	N/A****			
Number of Head of Households unemployed.	436	436*	1,222	No
Number of Head of Households in Other Category (ex: receiving TANF, SSI, Child Support, General Assistance, etc.).	15,211	15,211*	9,478	Yes

SS # 4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Number of households receiving TANF assistance (decrease).	1,955	1,955*	717	Yes
SS #8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase).*****	322	322**	174	No

*SCCHA does not anticipate that this activity will increase the Agency's rental revenue, increase positive outcomes in employment status, or decrease the number of households on TANF assistance. The "tenant rent share in dollars" baseline amount is the total amount that households pay toward rent per month as of the beginning of FY2015.

**SCCHA does not expect that this activity will lead to households increasing their earned income/transitioning off assistance.

***SCCHA does not track whether employment is full-time or part-time.

****SCCHA does not track whether a Head of Household is enrolled in an educational program and/or a job training program.

*****Self-sufficiency is defined as households who leave assistance voluntarily, or after 180 days of zero Housing Assistance Payments.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to the activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics during FY2021. The baselines and benchmarks have been updated to reflect the labor costs based upon compensation rates for FY2021 and changes in position titles. Tasks which were previously carried out by clerks are now carried out by Housing Assistants.

ACTUAL SIGNIFICANT CHANGES

In FY2021 HUD approved an extension to the technical amendment of FY2020, reducing the frequency of regular reexaminations to every 4 years for households with only fixed income sources, and 3 years for all other households. The FY2021 Amendment extends this modified Activity through FY2023 (ending June 30, 2023).

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

In FY2021, the participants who were affected by this activity experienced a decrease in their tenant rent share to a total of \$6,028,689, which does not meet the benchmark for metric CE #5: Increase in Tenant Rent Share. However, the tenant rent portion did not decrease due to Activity #2009-1. The decrease in tenant rent share can be attributed to Activity #2014-4, which allows SCCHA to raise the Tenant's Rent Portion up to the 35% percent of their gross income. In FY2015, SCCHA's Board of Commissioners approved the reduction of the tenant portion from

35% to 32% of the tenant's gross income. The reduction of total tenant rent share can also be attributed to SCCHA's lower voucher utilization rates of participants housed in units.

For metrics SS #1: Increase in Household Income, SS #3: Increase in Positive Outcomes in Employment Status, and SS #8: Households Transitioned to Self-Sufficiency, SCCHA did not and does not expect this activity to lead to households increasing income, transitioning to self-sufficiency, or increases in employment.

ACTIVITY 2009-2: EXPEDITING INITIAL ELIGIBILITY INCOME VERIFICATION PROCESS

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2009

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to extend the time period in which application documents are valid, from 60 days to 120 days.

IMPACT OF MTW ACTIVITY

Extending the documentation timeframe provides labor savings, both to applicants and to SCCHA. With this activity, applicants do not need to repeatedly provide updated income and asset documentation if the previously provided information becomes too old (dated older than 60 days) before voucher issuance. This activity was initially proposed to allow SCCHA to transfer residents affected by the public housing disposition (which occurred between 2007 and 2011) to the Project Based Voucher program with no lapse in assistance but has been helpful in saving time during other times of increased new admissions when there might be delays between determining initial eligibility and voucher issuance.

UPDATE ON MTW ACTIVITY

During FY2021, SCCHA utilized the extended 120-day document submission window for the voucher issuance of 33 applicants. If this activity was removed, the labor time related to requesting updated income verification for dated documents would cost the agency a minimum of \$318 annually. SCCHA met all the benchmarks in this activity.

STANDARD HUD METRICS

ACTIVITY 2009-2: EXPEDITING THE INITIAL ELIGIBILITY INCOME VERIFICATION PROCESS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$318	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	30	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021. The baselines and benchmarks have been updated to reflect the labor costs based upon compensation rates for FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The agency did not experience any challenges in meeting this activities benchmarks.

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

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2009

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

The Chronically Homeless Direct Referral (CHDR) program is a locally-designed program launched in FY2009 that serves the chronically homeless population in Santa Clara County. Following a housing-first model, chronically homeless individuals and families not on the voucher waiting list are referred for tenant-based housing assistance and connected to case management services. These services can include assistance with the initial process of securing housing, as well as various referrals and services to help the families maintain housing stability and achieve reintegration into the community. Since the program's inception, SCCCHA has worked closely with community partners and service providers to continually adapt the program design to address ongoing local needs.

IMPACT OF MTW ACTIVITY

This activity increases housing choices and mobility by assisting the homeless population through a more targeted and efficient process than the standard voucher waiting list system. CHDR program participants are directly referred from the streets and connected to supportive services. In September 2016, SCCCHA approved the issuance of an additional 500 vouchers to the chronically homeless population in Santa Clara County. With the 500 new vouchers, SCCCHA has now committed 800 Housing Choice Vouchers to this activity.

UPDATE ON MTW ACTIVITY

When originally proposed, this activity supplied Housing Choice Vouchers to the CHDR program. SCCCHA and the County have come to realize that Project Based Vouchers (PBV) are a more effective way to assist the chronically homeless population. The County is an active partner in this effort and continues to be the referral source for all CHDR vouchers.

Through FY2021, SCCCHA has housed 707 individuals and families in PBV units through the CHDR program. An additional 598 vouchers have been awarded and are in the construction pipeline. SCCCHA has exceeded the benchmarks for HC#5 and HC#7 through the use of tenant-based and project based CHDR vouchers. Occupancy of CHDR-PBV units is restricted to individuals and families referred for the unit from the CHDR program, so vacant units will continue to assist CHDR participants.

STANDARD HUD METRICS

Activity 2009-5: Exploring New Housing Opportunities for the Chronically Homeless				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	800 (with an annual 3% attrition rate)	1,538	Yes
HC #7: Households Assisted by Services that Increase Housing Choice				
Number of households receiving services aimed to increase housing choice (increase).	0	800 once fully leased up (with an annual 3% attrition rate)	1,538	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

The HC#3 Decrease in waiting list Time metric was removed from this activity because, as of May 1, 2021, SCCCHA exhausted the waiting list that was in use since the inception of this activity. Moving forward SCCCHA is using an interest list where families and individuals seeking housing assistance can register. Individuals from the interest list will be drawn via a lottery and placed on the waiting list for immediate processing as vouchers are available for issuance. There were no changes to the activity's two other metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges in meeting benchmarks for this activity.

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

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2010

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity 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 unit 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.

IMPACT OF MTW ACTIVITY

This activity was designed to reduce the necessary outreach to fill a vacant PBV unit from the SCCHA waiting list, thus supporting program cost effectiveness. It also has the added benefit of increasing owner satisfaction with the PBV program by filling vacancies more expeditiously. In the first three years of implementation, the activity was highly successful, reducing the average number of days a PBV unit is vacant by 25 days.

UPDATE ON MTW ACTIVITY

There were 71 PBV vacancies lasting longer than 30 days in FY2021. SCCHA saved approximately 15 minutes per vacancy by allowing owner referrals after 30 days of unsuccessful attempts by owners to fill their vacancies through SCCHA's referrals. This activity saved the agency 17.75 hours of labor and approximately \$1,112. SCCHA plans to put this activity on hold in FY2022 as the interest list is designed to provide referrals more efficiently than the traditional waiting list, and will obviate the need for a property to send their own referrals.

STANDARD HUD METRICS

Activity 2009-8: 30-Day Referral Process for Project-Based Vacancies				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$3,335	\$2,223	\$2,223	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	53.25hours	35.5 hours	35.5 hours	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics FY2021. The baselines and benchmarks have been updated to reflect the labor costs based upon compensation rates for FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The agency did not experience any challenges meeting the activity's benchmarks.

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

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2010

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to use the Tenant Income Certification (TIC) form required under the LIHTC Program as verification of the family's income and assets, thereby streamlining the income and asset verification process for applicants for PBV units at tax credit properties. SCCHA staff currently uses property-owner TIC documentation to verify applicant income and assets, saving staff time to gather and calculate annual household income.

Owners of project-based units that utilize tax credits must comply with Federal LIHTC regulations. LIHTC requires nearly identical information for verification of income and assets as the Housing Choice Voucher regulations when determining and recertifying a family's income eligibility.

Prior to the implementation of this activity, when properties utilized both tax credit and project-based voucher (PBV) subsidy, SCCHA and the PBV owner would duplicate their efforts in the income and asset verification process. This created redundant demands on the families each year for the same documentation to two different parties, caused SCCHA staff to spend extra time verifying income and assets that were already verified by the unit owner, and unnecessarily delayed processing new applicants when filling PBV vacancies.

IMPACT OF MTW ACTIVITY

SCCHA staff used property-owner TIC documentation to verify applicant income and assets. Using TIC documentation saves 50 minutes of staff time on processing for each of the new admissions, resulting in a labor time reduction of 22% for each transaction.

Additionally, the length of time to process an application was reduced from an average of 46 days to an average of 23 days. Besides providing a benefit to applicants, this activity also reduces SCCHA's administrative burden and achieves greater cost effectiveness in federal spending.

UPDATE ON MTW ACTIVITY

In FY2021, SCCHA completed 281 initial certifications, each taking approximately three hours. Through this activity, SCCHA saved approximately 234 staff hours to gather and calculate the annual household income of the families and reduced the total cost of verification of income and assets by \$7,524.

The Agency has saved 1,560 total labor hours since this activity's implementation by using the owner-provided TIC to verify a PBV applicant family's income and assets, resulting in a total direct labor savings of \$41,714. Annual savings continue to vary year-by-year, depending on the number of applicants moving into LIHTC properties.

Activity 2009-9 Aggregate Savings						
Metrics	FY2010 - FY2017	FY2018	FY2019	FY2020	FY2021	Totals
# of Tax-Credit New Admissions Completed Using Owner-Provided TIC.	953	201	215	223	281	1,873
# of Labor Hours Saved.	794	167	179	186	234	1,560
Labor Dollars Saved.	\$18,491	\$4,630	\$5,087	\$5,981	\$7,524	\$41,714

STANDARD HUD METRICS

Activity 2009- 9: Utilization of Low Income Housing Tax Credit (LIHTC) Tenant Income Certification (TIC) for Income and Asset Verification				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$34,631	\$27,107	\$27,107	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	1,077 hours	843 hours	843 hours	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There are no non-significant changes to this activity in FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics during FY2021. Wage data used to calculate the total cost of the task and labor dollars saved was updated to account for FY2021 wage increases. The new baseline and benchmark are based on the same amount of time required to complete the task measured.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The agency did not experience any challenges in meeting this activity's benchmarks.

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

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2010

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows SCCHA to project-base more than 25% of the units in existing multi-family complexes without requiring participation in supportive services. Although participation is not mandatory, services must be provided, and families must be made aware of and encouraged to participate in these services. This MTW activity increases housing choices for low-income families by making the units more attractive to families who do not want or need supportive services. The activity continues to reduce SCCHA's administrative burden by removing the required compliance monitoring for families living in the "excepted" units (i.e. units above the 25% cap).

IMPACT OF MTW ACTIVITY

SCCHA saves approximately one staff labor hour per unit annually by eliminating the required quarterly compliance reviews to ensure that families are using supportive services.

UPDATE ON MTW ACTIVITY

In FY2021, SCCHA exceeded the 25% per project cap at 1 PBV project, Shorebreeze Apartments (5 additional units out of 62 total units). To date, SCCHA has project based 511 units at 19 different projects using this activity. Supportive services were available (but participation was not required) on-site for all units in the projects.

STANDARD HUD METRICS

Activity 2009-11: Project Base 100% of Units in Family Projects				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). These units serve families.	511	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There are no non-significant changes to this activity in FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines, or benchmarks during FY2021. The baseline was updated to 511 for FY2021 to account for the additional PBV units added under this activity.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2009-13 COMBINED WAITING LISTS FOR THE COUNTY OF SANTA CLARA AND THE CITY OF SAN JOSE.

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2009

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

In 1976, SCCHA signed an agreement to administer housing assistance programs on behalf of both the City of San José and the County of Santa Clara. In accordance with this agreement, SCCHA is allowed to operate under one Annual Plan, one Administrative Plan, and one MTW plan for both housing authorities. In 2009, this activity was implemented to allow SCCHA to operate using one Waiting List for both housing authorities.

This activity applies to a joint waiting list of the Housing Choice Voucher (HCV) and the Project-Based Voucher (PBV) Programs.

IMPACT OF MTW ACTIVITY

This activity allows SCCHA to increase cost effectiveness in federal expenditures. The implementation of a combined Waiting List for the City and County HCV programs also increases housing choices for low-income families who now have the ability to rent throughout Santa Clara County.

UPDATE ON MTW ACTIVITY

In December 2020, SCCHA transitioned from a traditional waiting list to a web-based, always-open Interest List. Applicants are now able to use the web application to edit their household information as needed, thus significantly reducing the need for SCCHA staff to manually input changes. The new system also requires applicants to log in at least once a year to stay active, which further eliminates the time-consuming process of a waiting list purge.

In the year prior to opening the Interest List, SCCHA staff processed 164 manual waiting list updates, at an average of 10 minutes per transaction. The baseline has been adjusted to reflect the actual time spent on waiting list maintenance prior to transitioning to the Interest List. If this activity was removed, the labor time related to administering two waiting lists would cost the Agency \$810 annually.

STANDARD HUD METRICS

Activity 2009-13: Combined Waiting List for the County of Santa Clara and the City of San José				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$810	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	27	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There are no non-significant changes to this activity for FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

Due to the diminishing nature of a waiting list, the actual amount of time spent maintaining it decreased each year. The Baseline was recalculated to reflect more accurately the cost of maintaining the waiting list prior to the transition to the online Interest List.

ACTUAL SIGNIFICANT CHANGES

The Interest List was launch in FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS

PLAN YEAR APPROVED: FY2009

IMPLEMENTED: FY2010

AMENDED: FY2014

DESCRIPTION OF MTW ACTIVITY

Current HUD regulations require that if a family's unit (voucher) size changes between regular reexaminations, the new voucher size and corresponding payment standard will be effective when the family moves or at the first regular reexamination following the change, whichever comes first. Given the reduction in frequency of regular reexaminations for SCCHA's MTW families, a program participant who reports a family composition change that decreases its voucher size between regular reexaminations may be over-housed up to three years and cause SCCHA to pay a higher portion of Housing Assistance Payment (**HAP**).

Under this activity, SCCHA immediately implements any changes in voucher size that occur between regular reexaminations as a result of family composition changes or subsidy size policy changes. SCCHA continues to follow HUD regulations by using the lower of the payment standard for the family's new voucher size or the payment standard for the dwelling unit when processing the interim reexamination. If the application of the new payment standard results in a decrease of the tenant's rent portion, the interim reexamination will be effective on the first of the month following the change. If the application of the new payment standard results in an increase of the tenant's rent portion, the interim reexamination will be effective on the first of the month following a 30-day notice to the tenant and owner.

IMPACT OF MTW ACTIVITY

This activity allows SCCHA to effectuate an immediate change in voucher size and its corresponding payment standard when a change in family composition or a change in SCCHA's voucher size policy occurs between regular reexaminations. SCCHA realizes substantial HAP cost savings, which were anticipated by allowing new payment standards to take effect at the time of interim reexaminations instead of regular reexaminations.

UPDATE ON MTW ACTIVITY

SCCHA processed 381 interim reexaminations resulting from a change in family composition. SCCHA did not meet its cost savings benchmark with a total of \$349,801,959 in HAP payments for FY2021. SCCHA's HAP payments increased due to the continued increase in Santa Clara County's rental market rents, combined with the adverse effects of job and income loss related to the COVID-19 pandemic.

The metric chosen for this activity, Cost Effectiveness #1: Agency Cost Savings, was selected

because the activity's implementation was designed to immediately realize any potential cost savings when a change in family composition or a change in SCCHA's voucher size policy occurs.

However, SCCHA's HAP payments rose due to the continued increase in Santa Clara County rental market rents, combined with the adverse effects of job and income loss related to the COVID-19 pandemic, and the continued implementation of MTW Activity 2017-3 Landlord Initiatives that provides an additional HAP payment for landlords who re-lease a unit to a new Section 8 HCV tenant between regular reexaminations.

MTW Activity 2017-1, Phasing in a Subsidy Standard Change, is also a contributory factor in the rise of HAP payments. The activity provides that if a household's voucher size changes due to a change in the agency's subsidy standard policy, the new voucher size would not take effect for households in a unit until either the family moves or the rental market vacancy rate remains 5 percent or higher for at least six months, whichever occurs first.

SCCHA revised its subsidy standard to two persons per bedroom where previously it was one bedroom for the Head of Household and their spouse or partner, if any, and an additional bedroom for every two remaining household members. Upon revising the subsidy standard and the rental market vacancy rate at higher than 5 percent, this activity was implemented, households remained on higher subsidies, thereby impacting the effectiveness of Activity 2009-14 and its ability to achieve its benchmark through HAP savings.

STANDARD HUD METRICS

ACTIVITY 2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).*	\$246,302,481	\$246,059,768	\$347,172,501	No

*This metric reflects a slight HAP increase of \$24,134,541. HAP changes are a result of an increase in the Santa Clara County rental market rents, combined with a marked increase in the number of owner-requested rent adjustments.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The challenges in achieving this activity's benchmark savings are a result of Santa Clara County's expensive rental market coupled with a lower than usual inventory of affordable housing. In addition, there has been an increase to HAP payments due to the adverse effects of job and income loss related to the COVID-19 pandemic.

Retention of higher subsidies for longer periods of time under the implementation of Activity 2017-1, Phasing in a Subsidy Standard Change continues to contribute to a higher HAP amount paid as well.

Absent a downturn in the rental market and a significant increase in affordable housing, the possibility of lowering the amount of HAP payments made may not occur as this activity's outcome is somewhat dependent on the fluctuation of the rental market. SCCHA continues to work on increasing the supply of affordable housing via MTW activities 2012-3 and 2012-4 and by project basing vouchers.

ACTIVITY 2010-2: EXCLUDING ASSET INCOME FROM INCOME CALCULATIONS FOR FAMILIES WITH ASSETS UNDER \$50,000.**PLAN YEAR APPROVED:** FY2010**IMPLEMENTED:** FY2010**AMENDED:** N/A**DESCRIPTION OF MTW ACTIVITY**

With this activity, SCCHA no longer calculates and includes income received from family assets under \$50,000. Since implementation in FY2010, SCCHA has met the statutory objective of reducing administrative costs and has encouraged families to increase their savings. SCCHA continues to realize savings in staff hours and cost of tasks.

IMPACT OF MTW ACTIVITY

This activity addresses the statutory objective of reducing administrative costs and may help families move toward economic self-sufficiency by encouraging saving. Most participant families have assets under \$50,000.

UPDATE ON MTW ACTIVITY

In FY2021, 4,774 MTW families with assets under \$50,000 had income calculations completed. With an approximate 10 minutes per transaction labor savings by no longer calculating asset income for these families, a total labor savings of 796 hours was realized. As a result, the Agency saved \$60,152 in FY2021.

SCCHA has saved a total of 9,384 labor hours since the activity's implementation by eliminating the calculation of income from family assets under \$50,000. The number of families reporting assets may vary from year to year and therefore the amount of savings will vary each year.

This is a rent reform activity, however, SCCHA received no hardship requests in FY2021.

Metrics	FY2010 – FY2017	FY2018	FY2019	FY2020	FY2021	Totals
# of transactions completed for families reporting assets under \$50,000.	37,032	4,691	5,330	4,476	4,774	56,303
# of Labor Hours Saved.	6172	782	888	746	796	9,384

Labor Cost Saved.	\$249,380	\$59,107	\$67,158	\$56,398	\$60,152	\$492,195
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STANDARD HUD METRICS

Activity 2010-2: Excluding Asset Income from Income Calculations for Families with Assets Under \$50,000				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$606,107	\$579,755	\$579,755	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	18,300 hours	17,505 hours	17,505 hours	Yes
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease).	0%	0%	0%	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to this activity's metrics during FY2021. Wage data used to calculate the total cost of the task and labor dollars saved was updated to account for FY2021 wage increases. The new baseline and benchmark are based on the same amount of time required to complete the task measured.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges in meeting the benchmarks for this activity.

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

PLAN YEAR APPROVED: FY2010

IMPLEMENTED: FY2010

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This 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 its 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 costs of tasks.

IMPACT OF MTW ACTIVITY

By using a higher payment standard at interim reexaminations, this activity lessens the rent burden for some MTW families and thereby increases their housing choices by helping maintain their unit's affordability. This activity was also intended to reduce administrative costs by reducing staff time required to process family moves into a less expensive unit. SCCHA last raised its payment standards on January 1, 2021 and they have remained at that level since that time. The increase in payment standard benefited MTW families whose approved gross rents exceed the maximum subsidy payment standards for their units, allowing them to maintain their unit's affordability. As a result, those families did not have to move into a less expensive unit.

UPDATE ON MTW ACTIVITY

SCCHA last utilized this activity in FY2021 as a result of an increase in payment standards on January 1, 2021.

In FY2021, there were 1,890 MTW families who had an increased payment standard applied at an interim reexamination. Of those families who had an increased payment standard, 314 had a rent burden (defined as paying more than 32% of their income towards the rent) prior to SCCHA raising the payment standards. The number of families with rent burden decreased to 174 after the application of the increases in the payment standards.

In addition, 6 families who had an increased payment standard moved from their unit, of which 6 had a rent burden when they moved. By using the higher payment standard, SCCHA was able to decrease the number of families paying more than 32% of their income towards the rent which may have contributed to the decrease in the number of families who moved with rent burden.

SCCHA spent 13 labor hours with a total cost of \$424 processing move-outs for the 6 families who had a rent burden when they moved. SCCHA also realized cost savings of at least \$104,003 and

time savings of 3,317 labor hours in not processing moves for all the families who benefitted from this activity. SCCHA anticipated this activity would reduce the number of rent burdened families moving from their unit by 20 percent. The lack of affordable and suitable housing units in the area served as a discouragement for families move despite the increases in the payment standards. The number of families with rent burden who moved has significantly dropped since this activity's implementation.

STANDARD HUD METRICS

ACTIVITY 2010-3: APPLYING CURRENT PAYMENT STANDARDS AT INTERIM REEXAMINATIONS				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$104,427	\$83,548	\$424	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	3,331	2,665	13	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience challenges in achieving this activity's benchmarks.

ACTIVITY 2010-4: ALLOCATION PROJECT-BASED VOUCHERS TO SCCHA-OWNED PROJECTS WITHOUT COMPETITION.

PLAN YEAR APPROVED: FY2010

IMPLEMENTED: FY2010

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity, implemented in FY2010, allows SCCHA to select SCCHA-owned housing sites for project-based assistance without a competitive process, saving staff time through labor hours and increased costs associated with the competitive process. SCCHA closed out Activity 2009-10 (Selection of SCCHA-owned public housing projects for PBV without competition) in FY2015 and will utilize this activity as needed in the future.

IMPACT OF MTW ACTIVITY

This activity eliminates the lengthy three-month competitive project-basing process for SCCHA-owned properties, saving staff time, labor costs, and administrative costs. SCCHA can accelerate its production and/or preservation of affordable housing, thereby increasing housing options for low-income families. To date this activity has allowed SCCHA to streamline the project-basing of 180 units for seniors and families.

UPDATE ON MTW ACTIVITY

No project-based vouchers were allocated to SCCHA owned properties in FY2021. Staff will continue to monitor this activity and will update when project-based vouchers are assigned to a SCCHA owned property.

STANDARD HUD METRICS

Activity 2010-4: Allocating Project-Based Vouchers to SCCHA-Owned Projects Without Competition				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$12,164	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	158	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There are no non-significant changes to this activity for FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

The Baseline Cost Savings was updated to reflect the wages and costs of newspaper publication for FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes, nor any amendments during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The benchmarks were achieved and there were no challenges for FY2021.

ACTIVITY 2011-1: STREAMLINED APPROVAL PROCESS FOR EXCEPTION PAYMENT STANDARD FOR REASONABLE ACCOMMODATION – HCV.

PLAN YEAR APPROVED: FY2011

IMPLEMENTED: FY2011

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity, implemented in FY2011, allows SCCHA to approve any requests for an exception payment standard above 110% of the published Fair Market Rent (FMR), as a reasonable accommodation for persons with disabilities. Under current HUD regulations, HUD approves the requests for an exception standard above 110% of the published FMRs. The length of time it takes for HUD to review and approve each exception payment standard request affects the tenant's opportunities to secure an accessible unit expeditiously.

IMPACT OF MTW ACTIVITY

This activity improves SCCHA's responsiveness to the needs of persons with disabilities who may have special housing requirements by relegating from HUD the approval process of an exception payment standard as a reasonable accommodation. As a result of the accelerated approval process of an exception to the payment standard, families with members that have disabilities have increased housing choices.

UPDATE ON MTW ACTIVITY

During FY2021 there were no reasonable accommodation requests for exception payment standard above 110% of FMRs.

Since implementation, SCCHA authorized exception payment standards above 110% of the FMR as a reasonable accommodation for ten households. As a result, those households are no longer at risk of losing their assistance and were able to move to a more suitable unit that accommodated their special housing needs.

STANDARD HUD METRICS

Activity 2011-1: Streamlined Approval Process for Exception Payment Standard for Reasonable Accommodation				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	3	0	0	Yes
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	3	10	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges in meeting the benchmarks for this activity.

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

PLAN YEAR APPROVED: FY2011

IMPLEMENTED: FY2011

AMENDED: FY2021

DESCRIPTION OF MTW ACTIVITY

This activity waives 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 qualifying independent agency conducts both initial and regularly scheduled HQS inspections, as well as rent reasonable services for initial contracts and requested rent adjustments. This MTW activity also allows SCCHA to waive the second part of the HUD regulation requiring the independent agency to supply copies of each HQS inspection report and rent reasonableness determination to the HUD field office.

IMPACT OF MTW ACTIVITY

SCCHA continues to benefit from the reduced costs and administrative streamlining related to this activity. The reduction in costs is achieved by eliminating unnecessary copying and mailing of inspection reports to HUD.

UPDATE ON MTW ACTIVITY

This MTW activity was amended in the FY2021 Plan to waive the remaining HUD requirement that independent entities perform various tasks on behalf of PHA when Section 8 subsidies are attached to PHA-owned projects. SCCHA now conducts the following tasks in-house: establishing contract rents, establishing term of initial and any renewal HAP contract, determining rent reasonableness, and assisting the family in negotiating rent with the owner.

STANDARD HUD METRICS

Activity 2011-2: Simplify Requirements Regarding Third-party Inspections and Rent Services				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$1,311	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	45	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no actual non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines, or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no actual significant changes to this MTW activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges in achieving benchmarks for this activity.

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

PLAN YEAR APPROVED: FY2012

IMPLEMENTED: FY2015

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity requires a Project Based Voucher (PBV) family to remain two full years in the PBV program before becoming eligible to request continued assistance with a tenant-based voucher when moving. This requirement has contributed to the occupancy stability in the PBV program and to a modest decrease in the number of PBV vacancies (in comparison to the total of PBV units) and associated turnover costs, including vacancy payments. 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).

SCCHA has 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.

IMPACT OF MTW ACTIVITY

This activity addresses the statutory objective of achieving greater cost effectiveness in federal expenditures by reducing Agency costs and staff time spent on processing turnover in PBV units.

UPDATE ON MTW ACTIVITY

In FY2021, 41 eligible PBV families moved and received continued housing assistance through tenant-based vouchers. SCCHA saved approximately 74 hours in labor hours this year resulting in labor cost savings of \$3,747. Tenant-based vouchers were available for eligible PBV families wanting to move with continued housing assistance during FY2021. However, the lack of affordable and suitable housing units in the area continues to serve as a discouragement for eligible PBV families to move. The COVID-19 Pandemic most likely reduced the number of people moving in this fiscal year.

STANDARD HUD METRICS

Activity 2012-2: Minimum Two-year Occupancy in Project-based Unit				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE # 1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$5,598	\$2,799	\$1,851	Yes
CE # 2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	110	55	36	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There was no change to the activity's metrics. Wage data used to calculate the baseline and benchmark was updated to account for wage increases in the last fiscal year.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges in meeting benchmarks for this activity.

ACTIVITY 2012-3: CREATE AFFORDABLE HOUSING ACQUISITION AND DEVELOPMENT FUND

PLAN YEAR APPROVED: FY2012

IMPLEMENTED: FY2012

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity implemented in FY2012 allows SCCCHA to use MTW funds to continue to seek and pursue opportunities to build new rental housing units. It also allows for the acquisition of existing land and/or units for new construction or rehabilitation.

With the implementation of this activity, SCCCHA's goals are to increase the supply of quality rental housing, and to serve a diverse range of resident populations many of which have special needs or are vulnerable populations.

IMPACT OF MTW ACTIVITY

The exceptionally high cost of land and high market rents in Santa Clara County create a special challenge for developers of affordable housing. The situation has worsened in recent years due to a decrease in federal, state, and local funds for affordable housing. SCCCHA created this activity to generate more development activities throughout Santa Clara County. In the initial 5-year Benchmark period, FY2015-FY2019, SCCCHA used this activity to allocate \$47 million to purchase land for E. Santa Clara Street, Alvarado Park Senior Housing and Bellarmino Family Housing, all of which will provide more than 250 units of affordable housing to the community. The activity was anticipated to lead to the development or rehabilitation of up to 875 units over five years from FY2015 to FY2019, with affordability for low-income tenants and with an affordability restriction on the properties of up to 55 years.

SCCCHA continues to use this activity and has updated the 5-year Benchmark to 2019-2024. The Outcome for CE#4 reflects the new 5-year Benchmark.

MTW ACTIVITY UPDATE

SCCCHA continued design development and financing plans for its Bellarmino Place Family Housing and Alvarado Park Senior Housing developments. These developments will provide a combined 204 units of affordable housing on a site SCCCHA previously acquired for \$12 million in MTW funds. In the last year, SCCCHA spent \$1.07 million on these two developments. SCCCHA also further refined its schematic design for the East Santa Clara developments, a site acquired by SCCCHA for \$30 million in MTW funds. The plan no longer includes a new office and the space previously dedicated to the office was reprogrammed into additional affordable housing. The 5.3-acre site is now planned to include six affordable housing developments, providing approximately 660 affordable homes. In the last year, SCCCHA spent \$1.08 million on these six developments.

STANDARD HUD METRICS

Activity 2012-3: Create Affordable Housing Acquisition and Development Fund				
Unit of Measurement	Baseline	Benchmark (5 year)	Outcome	Benchmark Achieved?
CE #4: Increase in Resources Leveraged				
Amount of funds leveraged in dollars (increase).	\$0	\$55 million	\$93.6 million	Yes
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0	250 units	182	Yes*

*SCCHA anticipates meeting the five-year benchmark at the construction completion for projects currently under construction and in the development pipeline.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines, or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2012-4: CREATE AFFORDABLE HOUSING PRESERVATION FUND FOR SCCHA AND AFFILIATE OWNED PROPERTIES

PLAN YEAR APPROVED: FY2012

IMPLEMENTED: FY2012

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

Using its broader use of funds authority, SCCHA ensures the long-term stability and viability of existing SCHHA- and affiliate-owned rental housing properties through the creation of an affordable housing preservation fund. The preservation fund, established in FY2012, currently allows SCCHA to respond to both planned and unforeseen events and conditions that may impact the Agency's housing portfolio.

Additionally, the preservation fund provides predevelopment financing for existing low-income housing projects developed or owned by SCCHA and allows SCCHA, either directly, or through its affiliates, to leverage funds from other sources and to secure various guarantees (such as operating deficit, tax indemnification, and loan repayment guarantees) associated with the properties. Use of the fund also enables SCCHA to conduct detailed capital needs assessments, review financial projections at each site, establish priorities for rehabilitation and refinancing, explore options for upgrading units and conduct other ongoing asset management activities.

IMPACT OF MTW ACTIVITY

By FY2022, SCCHA expects to have used the fund to preserve up to 500 units of affordable housing, with an affordability restriction of at least 55 years. The preservation fund allows SCCHA and affiliate-owned properties to remain affordable to existing and future tenants.

MTW ACTIVITY UPDATE

When SCCHA purchased the Buena Vista Mobile Home Park (Buena Vista) in 2017, it utilized \$26.5 million in MTW funds and \$14.5 million from the City of Palo Alto to acquire the property. SCCHA also received \$14.5 million from the County of Santa Clara to use on predevelopment and redevelopment of the park. In addition to the acquisition loan, SCCHA committed predevelopment funding of \$5.425M. To date, SCCHA has utilized about \$4 million of this MTW predevelopment loan. Funds have been spent on renovation planning and the first phase of renovations. This work has included the purchase of 20 new coaches, space upgrades, electrical upgrades, tenant relocations, permits, construction management and other associated costs.

In late 2020 it became clear that some of the renovation work needed at Buena Vista was not consistent with eligible uses of the County's \$14.5 million loan for the project. For example, the County's proceeds could not be spent to purchase new manufactured homes (an ineligible

expense). Accordingly, SCCHA needed to identify an alternative source of funds and determined that it was most efficient to replace \$14.5 million of SCCHA's MTW acquisition loan with the County's \$14.5 million and increase the size of SCCHA's development loan by \$14.5 million. The table below illustrates the adjusted loan amounts:

	Original Loan Amount	Adjustment	Revised Loan Amount
SCCHA MTW Acquisition Loan	\$ 26,575,000	\$ (14,500,000)	\$ 12,075,000
SCCHA MTW Development Loan	\$ 5,425,000	\$ 14,500,000	\$ 19,925,000
City of Palo Alto Acquisition Loan	\$ 14,500,000	\$ -	\$ 14,500,000
County of Santa Clara Acquisition Loan	\$ -	\$ 14,500,000	\$ 14,500,000
County of Santa Clara Development Loan	\$ 14,500,000	\$ (14,500,000)	\$ -
Total	\$ 61,000,000	\$ -	\$ 61,000,000

Since June of 2020, SCCHA has preserved four multi-family projects with a total of 378 units including \$200,000 at El Parador Apartments for new HVAC system, \$200,000 at Helzer Court Apartments for repairing leaking garage walls, \$150,000 for Buena Vista Mobile Home Park for operations and maintenance to stabilize the park and approximately, \$350,000 at San Pedro Gardens for rehabilitation work, including HVAC repair and roof upgrades.

STANDARD HUD METRICS

Activity 2012-4: Create Affordable Housing Preservation Fund for SCCHA and Affiliate-Owned Properties				
Unit of Measurement	Baseline	Benchmark (5 year)	Outcome	Benchmark Achieved?
CE #4: Increase in Resources Leveraged				
Amount of funds leveraged in dollars (increase).	\$0	\$36 million	\$29 million	Yes*
CE #5: Increase in Agency Rental Revenue				
Rental revenue in dollars (increase).	\$29,514,440	\$30,347,824	\$23,464,416	Yes**
HC #2: Units of Housing Preserved				
Number of housing units preserved for households at or below 80% AMI (increase).	0	500	907	Yes*

*SCCHA anticipates achieving its 5-year benchmark upon completion of work at planned projects.

**SCCHA anticipates achieving its 5-year benchmark at the culmination of the 5-year period.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines, or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2013-1: ELIMINATION OF THE EARNED INCOME DISALLOWANCE (EID) CALCULATION

PLAN YEAR APPROVED: FY2013

IMPLEMENTED: FY2015

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity eliminates the HUD-mandated EID calculation for an eligible assisted household when an unemployed or under-employed member with disabilities obtains a job or increases their wages. The mandated EID calculation is no longer necessary because SCCHA has a policy to not calculate income increases between regular reexaminations (which occur biennially or triennially for MTW families). This policy allows all families to benefit from increases in income that occur between their regular reexaminations, which can be up to three years away in some cases.

IMPACT OF MTW ACTIVITY

This activity decreases the staff time required to calculate a family's rent portion and reduces the likelihood of errors associated with calculating potential income exclusions. Time savings allow staff to provide higher quality service to families and reduce fraud through tenant education and increased fraud detection efforts.

UPDATE ON MTW ACTIVITY

As indicated in the table below, the value of the labor time saved is consistent with the benchmark. SCCHA saved a minimum of 15 labor hours in staff time by not calculating and tracking earned income disallowance as part of the rent calculation process, which translates to a minimum of savings of \$497.

STANDARD HUD METRICS

Activity 2013-1: Elimination of the Earned Income Disallowance (EID) Calculation				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE # 1: Agency Cost Savings				
Total cost of task in dollars (decrease)	\$497	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease)	15	0	0	Yes
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease)	100%	0%	0%	Yes
CE #5: Increase in Tenant Rent Share				
Tenant rent share in dollars* (increase)	\$8,065,166	\$8,065,166	\$6,028,689	Yes

* The “tenant rent share in dollars” amount is the total amount that households pay toward rent per month as of the beginning of FY2015.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

The baseline and benchmark for metric CE #1: Agency Cost Savings has been updated to reflect the labor costs based upon compensation rates for FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

CE#5: The decrease in the tenant rent share in dollars may be attributable to multiple causes – the combined effect of several MTW activities, increase in payment standards, a decrease in SCCA’s voucher utilization rate and the prevalent job loss from the COVID-19 pandemic.

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

PLAN YEAR APPROVED: FY2014

IMPLEMENTED: FY2014

AMENDED: FY2015

DESCRIPTION OF MTW ACTIVITY

Activity 2014-4 simplifies the calculation of TTP by removing all standard deductions and allowances and calculating a TTP between 30% and 35% of the gross monthly income or \$50 (minimum rent), whichever is higher. This activity also eliminates the inclusion of a utility allowance in the tenant rent calculation. Having the ability to adjust the percentage of monthly tenant rent portion allows SCCHA to fine-tune the necessary balance between the Agency's fiscal stability and resulting financial impacts to participants. This activity enables SCCHA to analyze its fiscal health and set a percentage accordingly. The simplified rent calculation is also conducive for the development of future programs that can address community needs, such as a shallow subsidy program that can assist more families or targeted self-sufficiency programs for special populations. SCCHA amended and re-proposed this activity in FY2015 to include its four remaining public housing units under this activity.

IMPACT OF MTW ACTIVITY

This activity allowed SCCHA to address an immediate and urgent need to reduce program costs because of reduced funding by removing all standard deductions and allowances and calculating a TTP between 30% and 35% of the gross monthly income or \$50 (minimum rent), whichever is higher. The simplified calculation also provides time savings to staff. Time savings allows staff to provide higher quality service to families and reduce fraud through tenant education and increased fraud detection efforts.

UPDATE ON MTW ACTIVITY

In FY2021, SCCHA did not make any changes to the monthly tenant contribution, which remains at 32% of the family's gross monthly income. SCCHA saved labor hours in staff time by not collecting and calculating allowances and expenses as part of the rent calculation process. The lowered monthly tenant contribution impacts the activity's ability to meet its benchmark as it was originally calculated based on 35% of a family's gross monthly income.

Metric CE#1 relates to the HAP savings generated by this activity. SCCHA did not meet its cost savings benchmark with a total of \$349,801,959 in HAP payments for FY2021. A competitive rental market increase in payment standards (as of January 1, 2021) and a larger number of rent adjustments processed in FY2021 contributed to the rise in HAP payments.

STANDARD HUD METRICS

ACTIVITY 2014-4: INCREASED TENANT CONTRIBUTION – 35% OF GROSS INCOME				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).*	\$246,302,481	\$210,174,768	\$347,172,501	No
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease). **	796	0	0	Yes
CE #3: Decrease in Error Rate of Task Execution				
Average error rate in completing a task as a percentage (decrease.)	12%	5%	4.6%	Yes
CE #5: Increase in Tenant Rent Share				
Tenant rent share in dollars (increase).	\$8,065,166	\$8,065,166	6,028,689	No

* This metric reflects a slight HAP increase from the previous FY of \$24,134,541. HAP changes are a result of an increase to the payment standards, combined with a marked increase in the number of owner-requested rent adjustments.

** The baseline represents the staff time it takes to collect and calculate allowances and expenses as part of the rent calculation process.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

Metric CE#1 relates to the HAP savings generated by this activity. SCCHA did not meet its cost savings benchmark with a total of \$349,801,959 in HAP payments for FY2021. A competitive rental market and an increase in payment standard (as of January 1, 2021) contributed to the rise in HAP payments. SCCHA is actively involved in efforts to produce and maintain affordable housing units in the community in efforts to lower ongoing rental costs.

CE#3: SCCHA met its benchmark in the number of rent calculation errors documented through quality control audits. The simplification of the rent calculation process and additional staff training contributed to the agency's ability to meet its projected benchmark of less than 5% with a .95% average error rate in completing a task.

CE#5: The Baseline and Benchmark for CE#5 reflects a monthly tenant contribution of 35% of the family's gross income, implemented in FY2014. In FY2015, the monthly tenant contribution was decreased to 32% of the family's gross income which is reflected in the FY2021 outcome of this metric and its inability to meet the benchmark. The lower tenant rent share is also related to a lower lease up rate. In FY2018, SCCHA increased the payment standards to 110 percent of the FY2017 FMRs and then again in FY2020 based on the FY2019 FMRs, in an effort to increase the lease up rate.

ACTIVITY 2015-2: PROJECT BASED VOUCHER INSPECTION SELF-CERTIFICATION

PLAN YEAR APPROVED: FY2015

IMPLEMENTED: FY2015

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity was implemented in FY2015 and waives the regulatory requirement to perform a re-check inspection for Housing Quality Standard deficiencies. Through this activity, SCCHA allows Project Based Voucher owners and tenants to self-certify the correction of reported non-life-threatening HQS deficiencies within the 30-day deadline instead of having a staff member or a subcontracted inspector conduct a re-check inspection. SCCHA continues to conduct re-check inspections for life threatening deficiencies which must be repaired within 24 hours.

IMPACT OF MTW ACTIVITY

By waiving the regulatory requirement for only non-life-threatening deficiencies, expenditures are reduced by eliminating the scheduling and conducting of a recheck inspection to determine if necessary, repairs were made. SCCHA has revised its Administrative Plan to reflect the change in policy as a result of the approval of this activity.

UPDATE ON MTW ACTIVITY

In FY2021, 129 PBV units had 30-day HQS deficiencies which did not require recheck inspections. As a result, SCCHA realized approximately \$3,802 in savings of re-inspection fees to an outside vendor. In prior years of reporting on this activity, SCCHA reported the error rate for all inspections, not just PBV inspections. In the FY2017 MTW Annual Report, SCCHA reported solely the error rate for PBV Inspections for metric CE #3. Beginning with the FY2018 MTW Annual Report, SCCHA stopped reporting the error rate as it does not accurately measure the impacts of this activity.

STANDARD HUD METRICS

Activity 2015-2: Project Based Voucher Inspection Self-Certification				
Unit of Measurement*	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$22,400	\$0	\$0	Yes
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	691**	0	0	Yes
<u>CE #3: Decrease in Error Rate of Task Execution</u>				
Average error rate in completing a task as a percentage (decrease).	19%	10%	0	Yes

*In 2013 SCCHA executed a contract with an outside vendor to conduct regularly scheduled inspections on HCV and PBV units. Because the outside vendor charges per inspection, not hourly, reporting on the total decreased time to complete the task in staff hours does not apply.

**Assumes SCCHA staff, rather than outside vendor.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2015-3: MODIFIED ELDERLY DEFINITION FOR PBV

PLAN YEAR APPROVED: FY2015

IMPLEMENTED: FY2015

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

HUD currently defines elderly to be persons aged 62 years or older and elderly families to those whose head, spouse or co-head are 62 years of age or older. SCCHA modified the age, for the Project Based Voucher (PBV) program, at which a person or family is considered elderly from persons aged 62 or older to persons aged 55 or older in order to align with the definition used by a number of affordable housing developments in the area. Therefore, PBV sites which define elderly as 55 years of age and older are considered an elderly property. This change in the definition allows SCCHA to refer a larger pool of applicants (any family with Head of Household or Spouse aged 55 and older) from its PBV waiting list to fill vacancies in these units and will allow the Agency to project-base 100% of the units in a project with aged 55 or older limitations (project is not subject to the 25% PBV per project cap).

IMPACT OF MTW ACTIVITY

SCCHA increased the number of units which are available for households who would not have otherwise qualified for the unit under the property's definition of elderly.

UPDATE ON MTW ACTIVITY

In FY2021, SCCHA project-based 63 units for seniors 55 and older in Leigh Avenue Apartments. With 879 total households being able to move to a better unit and/or neighborhood as a result of this activity, SCCHA exceeded the benchmark of 774.

STANDARD HUD METRICS

Activity 2015-3: Modify Elderly Definition for PBV				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease). Units designated for elderly households.	45	0	0	Yes
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	774	879	Yes

* Outcome assumes that 774 households will initially benefit from the activity the first year of implementation and then assumes a 5% vacancy rate (41 households) which will be filled with new households benefiting from the activity through 2022.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2016-2: STREAMLINING OF PBV COMPETITIVE SELECTION REQUIREMENTS

PLAN YEAR APPROVED: FY2016

IMPLEMENTED: FY2016

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity expands 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. The activity also waives HUD's requirements that the Housing Authority must select proposals within three years of the earlier selection date and allows SCCHA to accept proposals within fifteen years of the selection date. Moreover, the activity allows the earlier selection process to consider that the project would require rental assistance, including PBV assistance. SCCHA has revised its Administrative Plan to reflect the change in policy as a result of the approval of this activity.

IMPACT OF MTW ACTIVITY

This activity addresses the statutory objective of achieving greater cost effectiveness in federal expenditures by reducing Agency costs and staff time spent on selecting proposals for PBV assistance. The elimination of certain requirements in selecting proposals for PBV assistance promotes strategic collaborations with other local governments and agencies to leverage scarce resources for affordable housing and, in particular, permanent supportive housing and housing for special needs populations. This activity hastens the production of much needed housing, leverages Federal resources with local funding to serve the most vulnerable in our community, as well as reduces any unnecessary delay in issuing a Request for Proposal (RFP) or making a selection for PBV housing assistance.

UPDATE ON MTW ACTIVITY

In FY2021, SCCHA used this activity to project-base four (4) projects without competition. SCCHA selected the following projects for conditional awards of PBVs: Hillview, Immanuel Sobrato, Bascom Apartments, and Kifer Senior Apartments. Prior to the awards from SCCHA, these projects were subject to a competitive selection process through the County of Santa Clara.

If this activity was removed, the labor time related to selecting PBV proposals for projects previously awarded housing assistance by other governmental agencies would cost the Agency a minimum of \$6,350 per transaction. SCCHA met all the benchmarks in this activity.

STANDARD HUD METRICS

Activity 2016-2: Streamlining of PBV Non-Competitive Selection Requirements				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE # 1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$25,400	\$0	\$0	Yes
CE # 2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	600 hours	0 hours	0 hours	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

The baseline for CE#1 and CE#2 were updated based on the number of streamlined projects for FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks

ACTIVITY 2017-1: PHASING IN A SUBSIDY STANDARD CHANGE

PLAN YEAR APPROVED: FY2017

IMPLEMENTED: FY2017

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity provides that if a household's voucher size changes due to a change in the agency's subsidy standard policy, the new voucher size would not take effect for households in a unit under a Housing Assistance Payment (HAP) contract until (1) the family moves; or (2) the rental market vacancy rate remains 5 percent or higher for at least six months, whichever occurs first.

SCCHA revised its subsidy standard to two persons per bedroom. SCCHA previously paid for one bedroom for the Head of Household and their spouse or partner, if any, and an additional bedroom for every two remaining household members. Activity 2017-1 allows for Section 8 tenants under an active HAP contract to retain their current subsidy level when moving is impractical due to market conditions.

SCCHA staff continues to monitor the vacancy rate quarterly by utilizing the online rental market database, REIS. If vacancy rates rise to 5 percent or higher for two quarters (six months) in a row, SCCHA will provide a one-year minimum notice period to the family before applying the reduced voucher size in the rent calculation.

IMPACT OF MTW ACTIVITY

This activity allows the Agency to reap the benefit of new subsidy standards for families newly admitted to Section 8 and for movers without impacting assisted families under a current Housing Assistance Payment contract.

UPDATE ON MTW ACTIVITY

In FY2021, the rental market vacancy rate remained consistent at approximately 3.5 percent, below the five percent minimum threshold needed for the application of new subsidy standard for families remaining in place. This activity allowed families to remain in place, with a higher subsidy size than the current subsidy standard, avoiding the need to search for affordable housing in the tight Santa Clara County rental market in FY2021.

STANDARD HUD METRICS

ACTIVITY 2017-1: PHASING IN SUBSIDY STANDARD CHANGE				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC#4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). These units serve families.	1,742	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes made to the activity in FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines, or benchmarks in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks

ACTIVITY 2017-2: SPECIAL NEEDS POPULATION DIRECT REFERRAL PROGRAM

PLAN YEAR APPROVED: FY2017

IMPLEMENTED: FY2019

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

The Special Needs Direct Referral (SNDR) program is a locally designed program that serves Special Needs populations including disabled individuals at risk of institutionalization and transition aged youth (youth transitioning out of foster care who are at risk of becoming homeless). Following a housing-first model, special needs populations are referred directly from the County's Office of Supportive Housing into project-based units and connected with case management services. The case management includes services to help families maintain housing stability and to improve the health and well-being of people who have experienced housing instability.

IMPACT OF MTW ACTIVITY

This activity, implemented in November 2018, provides increased housing choices for the Special Needs population.

UPDATE ON MTW ACTIVITY

To date, this activity allowed SCCHA to house 73 individuals and families, in six separate developments, who would not have been assisted or would have had to wait years for the chance of assistance.

STANDARD HUD METRICS

Activity 2017-2: 30-Day Referral Process for Project-Based Vacancies				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	100	0	0	Yes
HC #7: Households Assisted by Services that Increase Housing Choice				
Number of households receiving services aimed to increase housing choice (increase).	0	100	73	No

ACTUAL NON-SIGNIFICANT CHANGES

There have been no non-significant changes.

ACTUAL CHANGES TO METRICS/ DATA COLLECTION

The HC#3 Decrease in waiting list Time metric was removed from this activity because, as of May 1, 2021, SCCHA exhausted the waiting list that was in use since the inception of this activity. Moving forward SCCHA is using an interest list where families and individuals seeking housing assistance can register. Individuals from the interest list will be drawn via a lottery and placed on the waiting list for immediate processing as vouchers are available for issuance. There were no changes to the activity's two other metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There are no changes for FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The benchmark for HC #7 has not been met as this activity was implemented in 2019 and developers have not yet requested all 100 vouchers.

ACTIVITY 2017-3: LANDLORD INITIATIVE

PLAN YEAR APPROVED: FY2017

IMPLEMENTED: FY2017

AMENDED: FY2018 & FY2019

DESCRIPTION OF MTW ACTIVITY

Activity 2017-3 allows SCCHA to provide HCV program owners who re-rent their unit to an HCV participant with vacancy payments. As approved in FY2017, Vacancy Payments, equal to 80 percent of the contract rent for up to 30 days are payable to Project based Voucher (PBV) and Section 8 Moderate Rehabilitation (MR8) units. In FY2018 this activity was amended to set the vacancy payment amount for Section 8 Housing Choice Voucher (HCV) units to include shared housing units, between \$500 and \$1,500 – an amount that was determined to be reasonable after evaluating the program-wide contract rent average. The Section 8 HCV vacancy payment is now referred to as the Landlord Loyalty Payment. The Landlord Loyalty Payment amount will be reviewed annually and included in SCCHA's Section 8 Administrative Plan.

This activity was amended in the FY2019 MTW Plan and expanded to include an incentive payment, referred to as the Landlord Bonus Payment, that is payable to new landlords who rent a unit to a Section 8 family. The bonus payment amount ranges between \$500 and \$2,500.

IMPACT OF MTW ACTIVITY

This activity increases the number of HCV units that are newly leased or re-leased to HCV participants, ensures 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, and a simplified process that expedites the method in which SCCHA administers vacancy payments.

UPDATE ON MTW ACTIVITY

In FY2021, a total of 359 units, that might have otherwise been removed, were retained as part of the HCV program as a result of Landlord Loyalty and Vacancy Payments made to landlords. An additional 404 units were added through the implementation of Landlord Bonus Payments in FY2021. A total of 763 units were preserved for households at or below 80% of the area median income, exceeding the benchmark set in FY2015 based on the number of HCV unit turnovers.

STANDARD HUD METRICS

Activity 2017-3: Landlord Initiatives				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC#2: Units of Housing Preserved				
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0	276	763	Yes

ACTUAL NON-SIGNIFICANT CHANGES

This activity was revised to change the Landlord Bonus Payment to a flat \$1,500 payment and to exclude owners of Low-Income Housing Tax Credit properties in FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2019-2: FAMILY SELF-SUFFICIENCY PROGRAM – WAIVE CONTRACT OF PARTICIPATION REQUIREMENTS

PLAN YEAR APPROVED: FY2019

IMPLEMENTED: FY2019

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity waives the requirement that a family enrolling in the FSS program must have an interim or annual reexamination conducted within 120 days of the Contract of Participation (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. 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.

This activity also waives the requirement that the Head of Household 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." This activity allows families to be classified as a "successful FSS completion" and receive escrow if at least one adult household member completes an Individual Training and Services Plan and is suitably employed at graduation. Under this activity, the Head of Household is still held to the requirements of both required agreements, but another household member is able to set and fulfill goals under the Individual Training and Services Plan, with the ultimate goal of maintaining suitable employment.

IMPACT OF MTW ACTIVITY

This activity allows SCCHA to broaden the pool of families who could benefit from the FSS program's escrow savings account to include families where the Head of Household is unable to work due to disability or other reasons.

UPDATE ON MTW ACTIVITY

SCCHA implemented this activity in FY2019. In FY2021 this activity continues to benefit SCCHA's participants, especially as many lost jobs or income related to the COVID-19 pandemic.

STANDARD HUD METRICS

Activity 2019 - 2: Family Self Sufficiency Program - Waive Contract of Participation Requirements				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
SS#1: Increase Household Income				
Average earned income of households affected by this policy in dollars (increase).	\$22,222	\$26,060	\$28,883	Yes
SS#2: Increase Household Savings				
Average amount of savings/escrow of households affected by this policy in dollars (increase).	\$0	\$5,056	\$8,425	Yes
SS#5: Households Assisted by Services that Increase Self-Sufficiency				
Number of households receiving services aimed to increase self-sufficiency (increase).	232	268	425	Yes
SS#8: Households Transitioned to Self-Sufficiency				
Number of households transitioned to self-sufficiency (increase).*	0	4	174	Yes
CE#1: Agency Cost Savings				
Total cost of task in dollars (decrease).	\$8,089	0	0	Yes
CE#2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	66	0	0	Yes

*Self-sufficiency is defined as households who leave assistance voluntarily, or after 180 days of zero Housing Assistance Payments.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes made to the activity in FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no significant changes to the activity during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

There were no challenges in achieving the benchmarks for this activity in FY2021

ACTIVITY 2019-3: WAIVING THE REQUIREMENT THAT A PHA RE-DETERMINE RENT REASONABLENESS FOR MANUFACTURED HOMES ANNUALLY

PLAN YEAR APPROVED: FY2019

IMPLEMENTED: FY2019

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity eliminates 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 continue after implementation of this activity, the protections of rent reasonableness determinations will remain available to the agency without additional costs.

IMPACT OF MTW ACTIVITY

This activity decreases the SCCHA staff time required to process additional rent reasonableness reviews 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. The saved staff time is reflected in cost savings, increasing the cost efficiency in operating the HCV program.

UPDATE ON MTW ACTIVITY

SCCHA was able to utilize this activity to perform rent reasonableness for manufactured home space rentals under the same policy as that of other housing assistance types on the HCV program. SCCHA performed a rent reasonableness analysis for a manufactured home space rental; however, that rent reasonableness check was performed as part of a rent adjustment request and not due to HUD policy.

STANDARD HUD METRICS

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?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease)	\$750	\$0	\$0	N/A
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease)	42 min per unit	0 hours	0	N/A

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics, baselines or benchmarks during FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2019-4: STREAMLINING THE LEASE-UP PROCESS

PLAN YEAR APPROVED: FY2019

IMPLEMENTED: FY2019

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity revised the lease-up process in order to alleviate the delays associated with processing and completing 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. Owners singled out the RFTA process as a source of frustration, and standard form HUD-52517 was specifically identified as a significant hurdle. The standard form requires owners to fill in information, which is already obtained elsewhere, thus being redundant. In addition, this activity simplifies some of the HUD requirements related to the lease between the tenant and owner. For example, HUD requires that the HAP contract and the lease must have matching lease terms and utility responsibilities. Any mismatch, no matter how insignificant, results in delays as staff must confer with the owner to rectify the mistake. As part of this activity SCCHA has created a Mandatory Lease Information form that ensures that the lease and HAP contract match, thus alleviating the back and forth with owners to make corrections.

This activity alleviated the concerns from owners by waiving 24 CFR §982.162 and §982.308 as necessary and changed the requirement of using Form HUD-52517 to simplify and streamline what constitutes as an approvable lease.

IMPACT OF MTW ACTIVITY

This activity improved customer service and communication between SCCHA and its participating owners and reduced the time necessary for the completion of the RFTA and lease up processes. By retaining current owners and attracting new owners to the program, this activity increased housing choices for Section 8 tenants. Furthermore, staff time dedicated to the RFTA process has resulted in administrative cost savings.

UPDATE ON MTW ACTIVITY

SCCHA was able to utilize this activity to streamline the lease-up process by adding the Mandatory Lease Information form and redesigning the RFTA. Because the Mandatory Lease Information form prevails over information obtained elsewhere in the RFTA, tenancy addendum, and lease, interactions between owners and staff to verify or rectify mistakes has decreased. Staff time to process new contracts has been reduced.

STANDARD HUD METRICS

Activity 2019 - 4: Streamlining the Lease-Up Process				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				
Total cost of task in dollars (decrease)	\$12,860	\$0	\$0	N/A
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease)	400	0	0	N/A

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics during FY2021. Wage data used to calculate the total cost of the task and labor dollars saved was updated to account for FY2021 wage increases. The new baseline and benchmark are based on the same amount of time required to complete the task measured as when the activity was proposed.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2020-01: INCREASE PBV PROGRAM CAP TO 40 PERCENT OF CONSOLIDATED ACC AUTHORIZED UNITS

PLAN YEAR APPROVED: 2020

IMPLEMENTED: 2020

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

The Housing Opportunity through Modernization Act of 2016 (HOTMA) allows Housing Authorities to project-base up to 20 percent of the Consolidated Annual Contributions Contract (CACC) authorized units, and an additional 10 percent for units allocated for 1) those who are homeless, 2) veterans, 3) supportive housing for persons with disabilities or the elderly, or 4) projects located in census tracts where the poverty level is 20 percent or less.

This activity allows SCCHA to increase the PBV program cap to 40% of the CACC units, without requiring special allocations or target populations for the PBVs above 20 percent of the CACC. On an annual basis SCCHA will evaluate the voucher turnover rate and the fiscal outlook to decide how many PBVs to allocate.

IMPACT OF MTW ACTIVITY

This activity will increase permanent affordable housing in Santa Clara County by encouraging new development of affordable PBVs. PBVs are an effective tool in the affordable housing arsenal as they provide long term affordability for vulnerable populations. Reaching 40% of CACC units will take time and SCCHA plans to be diligent in the allocation of vouchers to the PBV Program.

UPDATE ON MTW ACTIVITY

SCCHA continues to expand the PBV program; however, local affordable housing development has not reached the level to require utilizing 40% of the CACC units. In FY2021 an additional 243 PBVs were awarded to new construction developments, which brings the PBV program to approximately 21% of CACC units. SCCHA did not meet the benchmark of adding 300 PBV units per year, due to funding uncertainty caused by the COVID-19 pandemic.

STANDARD HUD METRICS

Activity 2020-1: Increase PBV Program Cap to 40 Percent of Consolidated ACC Units				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention (per year)				
Number of households able to move to a better unit or a neighborhood of opportunity as a result of the activity (increase).	0	300	243	No

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to this activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

SCCHA's FY2020 MTW Annual Report inadvertently omitted 93 PBVs which were awarded during that fiscal year; therefore, the benchmark was achieved in FY2020. In FY2021, in response to funding uncertainty caused by the COVID-19 pandemic, SCCHA adopted a more conservative fiscal approach regarding long-term commitments and did not hit the 300-PBV-per-year benchmark. SCCHA has already begun the process to solicit and conditionally award at least 300 PBVs in FY2022.

ACTIVITY 2020-2: INTERIM HOUSING

PLAN YEAR APPROVED: FY2020

IMPLEMENTED: FY2021

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

Using the flexibility of a local, non-traditional activity, SCCHA created a unique local, non-traditional, tenant-based, rental subsidy program to assist households who are being offered PBV under a Permanent Supportive Housing (PSH) program. SCCHA partnered with Santa Clara County and the City of San Jose to subsidize units in a multi-unit complex, master leased by a case management agency. The interim housing units are used to provide short-term housing to individuals and families approved for a PSH unit to which SCCHA has attached a PBV but is not ready for occupancy. The interim housing will move these highly vulnerable homeless clients off the street while they await their permanent home and will provide stability and allow case managers to begin engaging with the clients.

This activity meets a local need by providing short-term housing to families who are approved for a PSH unit, but are not able to move in right away, usually due to construction delays. Affordable housing is booming in Santa Clara County and new projects are constantly in development. Construction delays are not uncommon, and this activity allows families who are homeless or homeless with special needs, defined in activities 2009-5 and 2017-2, to begin working with their case managers and move into a safe, accessible location where SCCHA covers the rental costs.

SCCHA ensures compliance with HQS requirements and other requirements set forth in PIH Notice 2011-45 regarding parameters for local, non-traditional activities, including those specifically identified under the subheading Rental Subsidy Programs.

IMPACT OF MTW ACTIVITY

This activity increases housing options for low income families by providing stability to families approved for PSH units before moving into their permanent housing.

UPDATE ON MTW ACTIVITY

SCCHA implemented this activity in FY2021 by negotiating and executing a contract with the County for the Interim Housing program. The Contract was executed on December 1, 2020 but was not ready for move-in until June 2021. Four (4) approved PSH PBV tenants were able to move into Pedro Street soon after opening, in June 2021.

STANDARD HUD METRICS

Activity 2020-2: Interim Housing				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for chronically homeless or homeless with disability households at or below 80% AMI as a result of the activity (increase).	0	30	4	N/A
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	30	4	N/A
HC #7: Households Assisted by Services that Increase Housing Choice				
Number of households receiving services aimed to increase housing choice (increase).	0	30	4	N/A

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The activity was implemented in the middle of the fiscal year but was not ready for move-ins until June 2021, at which point families were able to move in.

ACTIVITY 2020-3: OVER-HOUSED/UNDER-HOUSED PBV HOUSEHOLDS

PLAN YEAR APPROVED: FY2020

IMPLEMENTED: FY2020

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

Under HUD regulations, a family receiving Project Based Voucher assistance must not be over-housed or under-housed based on the PHA's subsidy standards, both at the time of move in and any time during the family's occupancy. If a family size change results in the family being over-housed or under-housed in the PBV unit, they would be required to move to a right-sized PBV unit or receive a tenant-based voucher and reasonable time to move.

This activity waives this requirement such that if a family is over-housed or under-housed but not in violation of Housing Quality Standards space standards, the family may remain in the wrong-sized unit if the rental market vacancy rate is below five percent until 1) an appropriately sized unit becomes available at the project; or 2) the family requests a tenant-based voucher, whichever occurs first.

IMPACT OF MTW ACTIVITY

This activity increases housing options for families not living in an appropriate size unit by allowing them to remain in their unit until an appropriately sized unit becomes available at the property or the local rental market softens, increase unit inventory.

UPDATE ON MTW ACTIVITY

SCCHA implemented this activity in FY2020. The rental market vacancy rate remains under five percent, allowing families to remain in place.

STANDARD HUD METRICS

Activity 2020-3: Over Housed/ Under Housed PBV Households				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% of AMI that would lose assistance or need to move (decrease).	36	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to the activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2020-04: RENT TO OWNERS AND RENT REASONABLENESS

PLAN YEAR APPROVED: 2020

IMPLEMENTED: 2020

AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

HUD regulations require that during an assisted tenancy, the rent paid to owner not exceed the reasonable rent as determined by the Public Housing Authority. Occasionally, upon an owner's request for an annual rent adjustment the reasonable rent for the unit according to rental comparisons of similar units will not support the increased rent amount the owner is requesting and will be lower than the current approved rent for the unit. In these situations, HUD regulations require that SCCHA reduce the approved contract rent to reflect the current reasonable rent.

This activity waives the requirement to reduce approved contract rent in these circumstances. Instead, SCCHA will review an owner initiated rent adjustment and potentially reduce the approved contract rent only in those cases where the HUD-issued Fair Market Rents (FMRs) for the applicable bedroom size have dropped by more than 10% or more since the unit's last rent reasonableness review.

IMPACT OF MTW ACTIVITY

This activity has increased housing choices by way of retaining owners and affordable housing inventory in the Section 8 Voucher program.

UPDATE ON MTW ACTIVITY

During FY2021 there were 685 units where the rent was not reduced because of a lower rent comparable. The average rent reduction was \$200. This resulted in a \$137,000 per month cost for SCCHA, or \$1,644,000 annually.

STANDARD HUD METRICS

Activity 2020-04: Rent to Owners & Rent Reasonableness				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #4: Displacement Prevention				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	685	0	0	Yes

ACTUAL NON-SIGNIFICANT CHANGES

The Baseline was adjusted to account for the number of units impacted by this activity.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to this activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

ACTIVITY 2020-05: ELIMINATE THE 40% OF INCOME CAP AT INITIAL LEASING**PLAN YEAR APPROVED: 2020****IMPLEMENTED: 2020****AMENDED: N/A****DESCRIPTION OF MTW ACTIVITY**

This activity raises the 40% cap on the percentage of family income spent on rent to a 50% cap. HUD regulations stipulate that at the time of initial lease up and when the approved contract rent exceeds the applicable payment standard, the family is prohibited from spending more than 40% of their monthly income towards the rent. In an area of the country where it is typical to pay over 50% of your monthly income towards housing costs, this regulation is prohibitive towards Section 8 tenants, especially when rental owners typically have hundreds of applicants vying for one rental unit.

In the highly volatile rental housing market and with extremely low vacancy rates (current vacancy rate for all classes of apartments is less than 3%), Santa Clara County (aka Silicon Valley) landlords can demand and receive a higher rent than what SCCHA's payment standard will cover. This activity increases the number of housing options for shopping voucher holders, while still ensuring some level of protection for Section 8 renters (instead of lifting the cap entirely).

This Activity was proposed as a 1-year technical amendment bypassing the public notice period, due to the 2019-2020 COVID-19 pandemic. The Santa Clara County Public Health Department issued a wide-ranging shelter-in-place order effective March 16, 2020, which closed all non-essential businesses in the County.

IMPACT OF MTW ACTIVITY

SCCHA is experiencing a dramatic increase in the number of people facing housing insecurity as a result of the COVID-19 pandemic, this Activity removes one of the barriers to quickly leasing up voucher holders. Thirty-one new contracts were approved with tenants paying above 40% and up to 50% of their monthly income towards the rent.

UPDATE ON MTW ACTIVITY

This activity was proposed in a technical amendment to the FY 2020 MTW Annual Plan shortly after Santa Clara County imposed Shelter in Place orders in response to the COVID-19 pandemic and was implemented immediately upon approval. SCCHA did not re-propose this activity in a subsequent MTW Annual Plan. A community partner requested SCCHA close out the activity as the threshold of over 40% was thought too burdensome on families.

STANDARD HUD METRICS

Activity 2020-5: Eliminate the 40% of Income Cap at Initial Leasing				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit or a neighborhood of opportunity as a result of the activity (increase).	0	45	205	No

*Does not include households paying the minimum rent of \$50 per month regardless of the activity's implementation.

ACTUAL NON-SIGNIFICANT CHANGES

There were no non-significant changes to this activity during FY2021.

ACTUAL CHANGES TO METRICS/DATA COLLECTION

There were no changes to the activity's metrics in FY2021.

ACTUAL SIGNIFICANT CHANGES

There were no significant changes to this activity during FY2021.

CHALLENGES IN ACHIEVING BENCHMARKS AND POSSIBLE STRATEGIES

The Agency did not experience any challenges meeting this activity's benchmarks.

B. Activities Not Yet Implemented

Activity	Year Approved	Description	Action Taken During the Fiscal Year
2014-1a & 2014-1b Focus Forward Program (And Amendments)	FY2014	<p>Activity 2014-1a: Focus Forward 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 with a more robust case management and ongoing program-incentives component.</p> <p>Activity 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 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. In the FY2020 Annual Plan, SCCHA amended this activity to include a restriction on the ability of Focus Forward Program participants to exercise outgoing portability.</p>	<p>SCCHA re-proposed this activity in the FY2020 MTW Plan to restrict portability of the FFP voucher. SCCHA has concluded its work with the contracted consultant to develop the FFP program and foundational documents. It is also anticipated that the RFP for case management services will be circulated in the first quarter of FY2022 with an award for service soon thereafter.</p> <p>FFP implementation is currently forecasted for mid- FY2022.</p>

Activity	Year Approved	Description	Action Taken During the Fiscal Year
2014-2 Eliminate Requirement to Re-Determine Rent Reasonableness when HUD decreased Fair Market	FY2014	This activity, approved in FY2014, eliminates the HUD requirement to re-determine the rent reasonableness of affected units within 60 days of the contract anniversary date when HUD reduces FMRs by 5% or more.	HUD has not reduced FMRs by 5% or more since this activity was approved. If and when that occurs, SCCHA will explore implementing this activity.
2016-1 Restriction on Head of Household Changes	FY2016	This activity requires a newly designated Head of Household to enroll in the Focus Forward Program if the previous Head of Household decides to leave the program and transfer their Head of Household designation to a remaining non-elderly/non-disabled family member.	This activity will be implemented when the Focus Forward Program (Activity 2014-1) is implemented. See 2014-1a and 2014-1b.
2017-4 Setting Payment Standards Above 110 Percent of HUD Fair Market Rents	FY2017	HUD regulations require that payment standards are set between 90 and 110 percent of HUD issued Fair Market Rents (FMRs). This activity authorizes SCCHA's Board of Commissioners to approve a countywide payment standard of up to 130 percent of the FMR without prior HUD approval. The flexibility to allow SCCHA to increase the payment standard will allow our participants to be more competitive in the high-priced Santa Clara county rental market, when needed	SCCHA continues to monitor the rental conditions in Santa Clara County. The rental conditions that prompted this activity are not currently present. Although vacancy rates are decreasing, they are not to the point where this activity is required. As noted in the implementation plan, SCCHA may implement this activity when the local housing market experiences another surge in cost.

Activity	Year Approved	Description	Action Taken During the Fiscal Year
2018-1 Strengthening Partnerships through Capacity Building	2018	SCCHA will use MTW funds to support community partners in building capacity in support of the FFP. This funding will enable community partners to build additional capacity in areas that promote client self-sufficiency, such as job readiness and higher education, expanding their ability to serve both SCCHA and non SCCHA participants. To ensure that funds are allocated in accordance with the pilot FFP objectives, SCCHA will establish an application process, and develop fund issuance criteria that will have to be completed prior to the award of funds. The total amount of funds to be awarded per year will not surpass \$100,000.	This activity will be implemented when the Focus Forward Program (Activity 2014-1) is implemented. Hired in the spring of 2019, the consultant prepared foundational documents. These documents establish policies and procedures with respect to implementing the FFP. See 2014-1a and 2014-1b.
2019-1 Graduation Bonus	FY2020	Activity 2019-1: Graduation Bonus. Participants whose income has increased to the point where the HAP paid to landlords on their behalf is less than \$100 will be removed from the Section 8 program after a 60-day notice and will be paid a bonus of \$2,000 per eligible individual. "Eligible individuals" is defined as members of the HCV participant family who have eligible immigration status and does not include live-in aides, foster adults, or foster children. The bonus is contingent on a positive exit from SCCHA's Section 8 program.	SCCHA prepared draft revisions to the Administrative Plan and procedures manual, The Graduation Bonus policies and procedures will be finalized in mid-2022.

2021-1 Impose Limits on Project Based Voucher to Housing Choice Conversion	FY2021	The number of PBV to HCV conversions will be limited to ten percent of the allocated HCVs to be distributed per year. Limiting the conversions will help meet the high demand for vouchers by increasing the number of applicants assisted from the waiting list.	SCCHA prepared draft revisions to the Administrative Plan and procedures manual. The policies and procedures will be finalized in FY2022.
2021-2 Simplify Minimum Rent Hardship Exemption	FY2021	SCCHA will waive HUD's Minimum Rent financial hardship exemption and replace it with a simpler exemption policy to better address the needs of SCCHA's participants.	SCCHA prepared draft procedures and policies. Procedures and policies will be finalized in FY2022.

C. Activities On Hold

Activity	Year Approved/ Implemented /Placed on Hold	Description	Action Taken During the Fiscal Year
2010-5: Assisting Over-Income Families Residing at SCCHA-owned Project-Based Voucher Properties	FY2010/ FY2011/ FY2015	This activity was implemented in FY2011. Since its implementation, SCHAA has not used this waiver since no families have exceeded the income threshold. Only one public housing project (Deborah Drive) remains that could potentially benefit from this activity and there is no plan at this time to dispose of this property. Therefore, SCHAA placed this activity on hold indefinitely but could re-implement when the last public housing project is disposed.	None
2012-5: Expand Tenant Services at SCHAA-Owned or Affiliate-Owned Affordable Housing Properties	FY2012/ FY2012/ FY2016	<p>This activity, implemented in FY2012, allows SCHAA a broader use of funds authority to expand its provision of programs and services for tenants living in SCHAA-owned or affiliate-owned non-Section 8/9 affordable rental properties.</p> <p>The SCHAA-owned and affiliate-owned affordable housing properties continue to pay for tenant services directly from their respective operating budgets. Currently, there is no need to expand tenant services and there is no implementation timeline to re-activate.</p>	None

Activity	Year Approved/ Implemented /Placed on Hold	Description	Action Taken During the Fiscal Year
2014-3: Freeze on Contract Rent Increases	FY2014/ FY2015	Implemented in FY2014, this activity imposed a freeze on any owner requested rent increases for one-year effective September 2013 through August 2014. SCCHA lifted the freeze and began accepting owner requested rent increases again as of September 1, 2014. Subsequent freezes on owner requested rent increases are subject to SCCHA's Board of Commissioners' approval and are limited to a one-year term. Therefore, SCCHA has placed this activity on hold indefinitely but could re-implement when necessary.	None

D. Closed Out Activities

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2009-3 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 FY2015
2009-4 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 FY2012
2009-6 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 FY2009
2009-7 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 FY2009
2009-10 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 FY2015

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2009-12 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 FY2009
2010-1 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 FY2013
2012-1 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 FY2013
2015-1 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 FY2015

<p>2020-6 Reduced Frequency of Periodic Inspections</p>	<p>PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A</p> <p>REASON FOR CLOSING OUT ACTIVITY:</p> <p>This activity was proposed in a technical amendment to the FY 2020 MTW Annual Plan shortly after Santa Clara County imposed Shelter in Place orders in response the COVID-19 pandemic and was implemented immediately upon Plan approval. On April 13, 2020, SCCHA adopted COVID-19 waiver HQS-5 and resumed performance of biennial HQS inspections. Families uncomfortable allowing the performance of an inspection could cancel biennial HQS inspections and have the inspection rescheduled to a later date removing the need to move to a three-year regular HQS inspection cycle as proposed by this activity. Under HUD COVID-19 Waiver HQS-5 SCCHA must inspect units with delayed inspections by June 30, 2022. SCCHA will continue to allow families to cancel scheduled biennial HQS inspections until December 21, 2021. Because of HQS-5 SCCHA did not re-propose this activity in a subsequent MTW Annual Plan.</p> <p>Final outcomes and Lessons: Although implemented immediately to help address challenges with performing periodic HQS inspections, this activity was not used by SCCHA</p>	<p>This activity was closed out in FY2021</p>
<p>Outcomes: N/A. This activity was not used to reschedule biennial inspections due to the issuance of COVID-19 statutory and regulatory waivers in PIH Notice 2020-05.</p>		

V. MTW Sources And Uses of Funds

A. ACTUAL SOURCES AND USES OF MTW FUNDS

i. Actual Sources of MTW Funds in the Plan Year

The MTW PHA shall submit unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA), or its successor system.

ii. Actual Uses of MTW Funds in the Plan Year

The MTW PHA shall submit unaudited and audited information in the prescribed FDS format through the FASPHA, or its successor system.

iii. Describe Actual Use of MTW Single Fund Flexibility

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW single fund flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described here, as they are already found in Section (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used MTW single fund flexibility to direct funding towards specific housing and/or service programs in a way that responds to local needs (that is, at a higher or lower level than would be possible without MTW single fund flexibility).

ACTUAL USE OF MTW SINGLE FUND FLEXIBILITY

The MTW agreement allows SCCHA 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 FY2021, SCCHA used its MTW Single Fund Flexibility to pay for housing search services for participants who are experiencing challenges in finding a rental unit. The Agency continued work on upgrading the online Owner and Tenant Portals. In addition, in December 2020, the Agency launched the long planned web-based application for registering applicants for Section 8 assistance.

B. LOCAL ASSET MANAGEMENT PLAN

i. Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

iii. Did the MTW PHA provide a LAMP in the appendix?

No

iv. If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

N/A

VI. Administrative

A. REVIEWS, AUDITS, AND INSPECTIONS

There were no reviews, audits, or inspections in FY2021 that required SCCHA to take action.

B. EVALUATION RESULTS

No program evaluations were completed this fiscal year beyond those required by the MTW agreement.

C. MTW STATUTORY REQUIREMENT CERTIFICATION

See attached certification in Appendix One of this MTW Report.

D. MTW ENERGY PERFORMANCE CONTRACT (EPC) FLEXIBILITY DATA

N/A

Appendix One: FY2021 Certification of Compliance with Statutory Requirements

Certification of Statutory Compliance

On behalf of the Housing Authority of the County of Santa Clara and the Housing Authority of the City of San Jose (the Agency), I certify that the Agency has met the three statutory requirements of the Moving to Work (MTW) Program during fiscal year 2021:

- 1) At least 75 percent of the families assisted by the Agency are very-low income families;
- 2) The Agency has, to the best of its ability, continued to assist substantially the same total number of eligible low-income families as would have been served without MTW; and
- 3) The Agency has continued to serve a comparable mix of families (by family size) as would have been served without MTW.


Preston Prince (Sep 24, 2021 15:39 PDT)

Preston Prince
Executive Director

09/24/2021

Date

Appendix Two: Approved MTW Activities for the FY2021 Reporting Period

Approved MTW Activities for the FY2021 Reporting Period

Activity # (Plan year proposed + Activity #)	Activity	MTW Statutory Objectives		
		Reduce cost and achieve greater cost effectiveness in federal expenditures	Provide incentives to families ... leading toward economic self- sufficiency	Increase housing choices for low- income families
IMPLEMENTED IN FY2009				
2009-1	Reduced Frequency of Tenant Reexaminations	X		
2009-2	Simplification and Expediting of the Income Verification Process	X		
2009-5	Exploring New Housing Opportunities for the Chronically Homeless			X
2009-13	Combined Waiting Lists for the County of Santa Clara and the City of San José	X		X
IMPLEMENTED IN FY2010				
2009-8	Streamlining the Project-Based Voucher Referral Process			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% of Units in Family Projects	X		X
2009-14	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		X

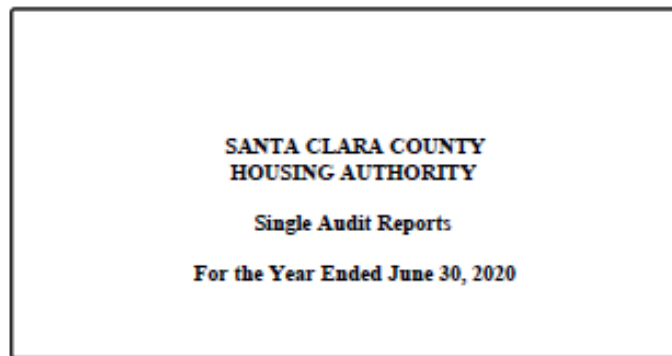
IMPLEMENTED IN FY2011				
2010-4	Allocating Project-Based Vouchers to SCCHA-owned Projects Without Competition	X		
2011-1	Streamlined approval process for exception payment standard for reasonable accommodation			X
2011-2	Simplify requirements regarding third-party inspections and rent services	X		
IMPLEMENTED IN FY2012				
2012-3	Affordable Housing Acquisition Development Fund			X
2012-4	Affordable Housing Preservation Fund for HACSC- and Affiliate-Owned Properties			X
IMPLEMENTED IN FY2014				
2014-4	Increased Tenant Contribution – Up to 35% of Gross Income	X		
IMPLEMENTED IN FY2015				
2012-2	Two-Year Occupancy in Project-Based Voucher Unit Before Eligible to Receive Voucher	X		
2013-1	Elimination of the Earned Income Disallowance (EID) Calculation	X		
2015-2	Project Based Voucher Inspection Self-Certification	X		
2015-3	Modified Elderly Definition for PBV			X

Activity # (Plan year proposed + Activity #)	Activity	MTW Statutory Objectives		
		Reduce cost and achieve greater cost effectiveness in federal expenditures	Provide incentives to families ... leading toward economic self- sufficiency	Increase housing choices for low- income families
IMPLEMENTED IN FY2016				
2016-2	Streamlining of PBV Competitive Selection Requirements	X		
IMPLEMENTED IN FY2017				
2017-1	Phasing in a Subsidy Standard Change			X
2017-3	Landlord Initiative			X
IMPLEMENTED IN FY2019				
2017-2	Special Needs Population Direct Referral Program			X
2019-2	Family Self-Sufficiency Program (FSS) – Waive Contract of Participation Requirements		X	
2019-3	Waiving the Requirement That a PHA Re-Determine Rent Reasonableness for Manufactured Homes Annually	X		
2019-4	Streamlining the Lease-up Process	X		X
IMPLEMENTED IN FY2020				
2020-1	Increase PBV Program Cap to 40 Percent of Consolidated ACC Authorized Units			X
2020-3	Over- Housed/ Under-Housed PBV Households			X
2020-4	Rent to Owners and Rent Reasonableness			X
2020-5	Eliminate the 40% Income Cap at Initial Leasing			X
IMPLEMENTED IN FY2021				
2020-2	Interim Housing	X		
NOT YET IMPLEMENTED				
2014-1	Focus Forward Program		X	

Activity # (Plan year proposed + Activity #)	Activity	MTW Statutory Objectives		
		Reduce cost and achieve greater cost effectiveness in federal expenditures	Provide incentives to families ... leading toward economic self- sufficiency	Increase housing choices for low- income families
2014-2	Eliminate Requirement to Re-Determine Rent Reasonableness when HUD decreased Fair Market Rents (FMRs)	X		
2016-1	Restriction on Head of Household Changes		X	
2017-4	Setting Payment Standards Above 110 Percent of HUD Fair Market Rents			X
2018-1	Strengthening Partnerships through Capacity Building		X	
2019-1	Graduation Bonus		X	
2021-1	Impose Limits on Project Based Voucher to Housing Choice Voucher Conversion	X		
2021-2	Simplify Minimum Rent Hardship Exemption			
ACTIVITIES ON HOLD				
2010-5	Assisting Over-Income Families Residing at SCCHA-owned Project-Based Voucher Properties			X
2012-5	Expand Tenant Services at SCCHA- and Affiliate-Owned Affordable Housing Properties		X	
2014-3	Freeze on Contract Rent Increases	X		

Note: Closed out activities are not shown. These were approved as activities 2009-3, 2009-4, 2009-6, 2009-7, 2009-10, 2009-12, 2010-1, 2012-1, 2015-1, and 2020-6.

Appendix Three: FY2020 Independent Auditor's Report (OMB-A-133) for SCCHA



**SANTA CLARA COUNTY
HOUSING AUTHORITY**
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For the Year Ended June 30, 2020

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Certified
Public
Accountants

**Independent Auditor's Report on Internal Control Over Financial Reporting
and on Compliance and Other Matters Based on an Audit of Financial
Statements Performed in Accordance With *Government Auditing Standards***

Members of the Board of Commissioners of the
Santa Clara County Housing Authority
San Jose, California

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the business-type activities and the aggregate discretely presented component units of the Santa Clara County Housing Authority, California (Authority), as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated January 15, 2021. Our report includes a reference to other auditors who audited the financial statements of the Authority's blended component units and discretely presented component units, as described in our report on the Authority's financial statements. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors. The financial statements of the blended component units, except for AE Associates, Ltd., HACSC/Choices Family Associates, San Pedro Garden Associates, Ltd., and S.P.G. Housing Inc., and the financial statements of the discretely presented component units, except for Bendorf Drive, LP, Clarendon Street LP, Fairground Luxury Family Apartments, LP, and Huff Avenue, LLC, were not audited in accordance with *Government Auditing Standards*.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

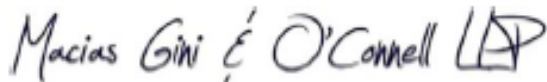
Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



Walnut Creek, California
January 15, 2021

Certified
Public
Accountants

**Independent Auditor's Report on Compliance For Each Major Federal Program;
Report on Internal Control Over Compliance; and Report on
Schedule of Expenditures of Federal Awards Required by the Uniform Guidance**

Members of the Board of Commissioners of the
Santa Clara County Housing Authority
San Jose, California

Report on Compliance For Each Major Federal Program

We have audited the Santa Clara County Housing Authority, California's (Authority) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on the Authority's major federal program for the year ended June 30, 2020. The Authority's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for the Authority's major federal program based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for the major federal program. However, our audit does not provide a legal determination of the Authority's compliance.

Opinion on the Major Federal Program

In our opinion, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended June 30, 2020.

Report on Internal Control Over Compliance

Management of the Authority is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Authority's internal control over compliance with the types of requirements that could have a direct and material effect on the major federal program to determine the

auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over compliance.

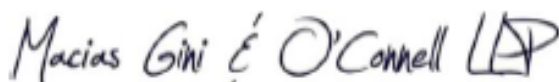
A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Report on the Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the business-type activities and the aggregate discretely presented component units of the Authority, as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements. We issued our report thereon dated January 15, 2021, which contained unmodified opinions on those financial statements. Our report also includes a reference to other auditors. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.



Walnut Creek, California
March 15, 2021

**SANTA CLARA COUNTY
HOUSING AUTHORITY**
Schedule of Expenditures of Federal Awards
For the Year Ended June 30, 2020

Grantor/Pass-Through Grantor/Program Title	Grantor Identifying Number	Federal CFDA Number	Expenditures
U.S. Department of Housing and Urban Development:			
<i>Direct:</i>			
Section 8 Project Based Cluster:			
Lower Income Housing Assistance Program -			
Section 8 Moderate Rehabilitation	n/a	14.856	\$ 1,496,331
Housing Voucher Cluster:			
Section 8 Housing Choice Vouchers	n/a	14.871	22,228,811
Mainstream Vouchers	n/a	14.879	2,576,794
COVID-19 - Mainstream Vouchers	n/a	14.879	15,774
Subtotal Mainstream Vouchers			<u>2,592,568</u>
Subtotal Housing Voucher Cluster			<u>24,821,379</u>
Family Self Sufficiency	n/a	14.896	388,979
Moving To Work Demonstration Program	n/a	14.881	365,828,264
COVID-19 - Public Housing CARES Act Funding	n/a	14.881	1,739
COVID-19 - Housing Choice Voucher CARES Act Funding	n/a	14.881	594,184
COVID-19 - CARES Act Funding Transferred to Moving To Work	n/a	14.881	3,061,892
Subtotal Moving To Work Demonstration Program			<u>369,486,079</u>
Total expenditures of federal awards			<u>\$ 396,192,768</u>

See accompanying notes to the schedule of expenditures of federal awards.

**SANTA CLARA COUNTY
HOUSING AUTHORITY**

Notes to the Schedule of Expenditures of Federal Awards
For the Year Ended June 30, 2020

NOTE 1 – GENERAL

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal grant activity of the Santa Clara County Housing Authority, California (the Authority). The Authority's reporting entity is defined in Note 1 of the Authority's basic financial statements. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations* (CFR) part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. Because the Schedule presents only a selected portion of the operations of the Authority, it is not intended to and does not present the financial position, changes in net position or cash flows of the Authority.

NOTE 2 – BASIS OF ACCOUNTING

Amounts reported on the Schedule represent expenditures incurred for the Authority's federal programs, and are reported on the accrual basis of accounting and include capitalized expenditures. Such expenditures are recognized following the cost principles contained in 2 CFR 200, Subpart E (Cost Principles), wherein certain types of expenditures are not allowable or are limited as to reimbursement. The Authority did not elect to use the 10% de minimis cost rate as covered in 2 CFR 200.414 Indirect (F&A) costs.

NOTE 3 - RELATIONSHIP TO FEDERAL FINANCIAL REPORTS

Amounts reported in the Schedule agree to or can be reconciled with the amounts reported in the related federal financial reports.

NOTE 4 - RELATIONSHIP TO BASIC FINANCIAL STATEMENTS

The Schedule agrees to or can be reconciled with the amounts reported in the Authority's basic financial statements.

**SANTA CLARA COUNTY
HOUSING AUTHORITY**
Schedule of Findings and Questioned Costs
For the Year Ended June 30, 2020

Section I – Summary of Auditor’s Results

Financial Statements

Type of auditor’s report issued:	Unmodified
Internal control over financial reporting:	
♦ Material weakness(es) identified?	No
♦ Significant deficiency(cies) identified that are not considered to be material weaknesses?	None reported
Noncompliance material to the financial statements noted?	No

Federal Awards

Internal control over major programs:	
♦ Material weakness(es) identified?	No
♦ Significant deficiency(cies) identified that are not considered to be material weaknesses?	None reported
Type of auditor’s report issued on compliance for major programs:	Unmodified
Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	No
Identification of major program?	14.881 - Moving To Work Demonstration Program
Dollar threshold used to distinguish between type A and type B programs:	\$3,000,000
Auditee qualified as a low-risk auditee?	Yes

Section II - Financial Statement Findings

None reported.

Section III - Federal Award Findings and Questioned Costs

None reported.

**SANTA CLARA COUNTY
HOUSING AUTHORITY**
Summary Schedule of Prior Audit Findings
For the Year Ended June 30, 2020

Prior audit findings were not reported.