

# FY2025 Moving to Work Annual Plan

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

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## SANTA CLARA COUNTY HOUSING AUTHORITY (SCCHA)

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

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*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

With a resident-centered approach, the Housing Authority is using authentic internal culture change to build stronger local and national partnerships, ensuring a new relevance in Santa Clara County and leading to a growth in Housing Authority developed and owned buildings. The innovative spirit of Silicon Valley is seeping into a new Housing Authority culture where collaborative efforts to address the affordable housing shortage in Santa Clara County are being executed. In FY2025, to ensure equity and justice, the Housing Authority plans to prioritize housing developments for low-income individuals and families, embracing the lived experience of our residents and community members.

According to the Silicon Valley Index Report, wealth inequality in Silicon Valley is more pronounced than in the U.S. overall or globally. The top 1% of households hold 48 times more total wealth than the bottom 50% of households. Approximately 23% of County residents live below the poverty threshold, with higher rates among people of color and marginalized communities. In the face of these statistics the Housing Authority has much work ahead.

Since January 2020, Santa Clara County's supportive housing system has connected more than 5,000 people with permanent housing. The County's \$950 Million Housing Bond has produced more than 4,400 permanent supportive housing units. The Housing Authority is an invaluable partner in this effort with Project-Based Vouchers supporting 2,170 units. The Housing Authority's annual investment is upward of \$74,000,000 and will continue to increase as more projects finish construction and rents increase in years to come. Our community's collective efforts are working. Fewer people are falling into homelessness, we have more temporary housing options and together we're leveraging new sources of local, state, and federal funding to overcome homelessness.

The Housing Authority is engaged in multiple efforts to expand the reach and breadth of programs offered to the community, including developing a Mobility Program and beginning to plan for a Direct Rental Assistance Fund, even as we await approval to use Moving to Work funds in this endeavor.

Moving forward, SCCHA's talented staff is fully engaged in working collaboratively with the community to create a more relevant, connected MTW program, truly driven by local input and efforts.

*Bracher Gardens Apartments*

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

SCCHA is continuing to improve the Moving to Work Plan process intentionally focusing on collaboration and inclusivity in planning and a purpose-driven approach to activity development.

## Vision and Goals

The Housing Authority is undergoing a refresh of the Strategic Plan to ensure the Plan is relevant to the future of the Agency and our role in the local community. The goals have not changed but have been streamlined into more accessible statements of intent that are centered around residents. SCCHA's future actions will be carefully examined through the lens of diversity, equity, and inclusion. These principles will be at the forefront of the agency's thought processes, and will guide the formulation of procedures, policies, and both internal and external engagement.

The Strategic Plan focuses on housing availability, agency partnerships, and operational excellence. Below are the goals of the Strategic Plan accompanied by SCCHA's actions to achieve the goals.

### Internal Culture Change

#### **Goal** Ensure Santa Clara County Housing Authority is a partner of choice in Santa Clara County.

The Housing Authority is entering an era of increased relevance in the community, both as the administrator of the Section 8 Program and as a highly visible developer of affordable housing. All of this requires dedicated staff, with a vested interest in the work of building vibrant communities through innovation. Team-building events and more open discussion are pushing the Agency into a more cohesive group with silos falling away in favor of collaboration.

**Strengthen Partnerships**

**Goal Collaborate with diverse partners to holistically support the needs of low-income communities.**

We are stronger together as evidenced by the outcome of pairing Project Based Vouchers with the County's \$950 million in Measure A bond funds. By the end of FY2025 the Housing Authority expects to have contributed to Measure A over 2,700 new Project-Based Vouchers for the most vulnerable groups in the County. Measure A as a whole has brought almost 6,500 newly constructed affordable units to Santa Clara County since 2016.

The Housing Authority has active partnerships with local municipalities, non-profit and for-profit developers, and community non-profits. In FY2025 the Housing Authority anticipates strengthening some of these partnerships by joining some of the smaller non-profit developers in the County to aid them in development of affordable housing.

**Relevance & Innovation**

**Goal Develop new ways of thinking and implementing solutions to serve our residents and community.**

As the Housing Authority, the County, and the broader community adopt a new normal SCCCHA intends to keep moving the needle on the technology that makes our jobs easier. There is a planned software conversion in FY2025 that will streamline staff processes and make it easier for residents to get quick answers to their questions.

**Portfolio Growth**

**Goal Increasing the value and unit count of our portfolio to ensure sustainable resident success.**

Approximately 3,500 multi-family units throughout the County are owned and managed by the Housing Authority, with that number only set to increase in the next several years. In an area where public dollars are competitive and less and less available, the Moving to Work funding at the Housing Authority allow our Development Team to continue working on the robust pipeline.



## Department Updates

### Housing Programs

- Increase community presence by attending local public events
- Introduced the “Eligibility Blitz” to process applicant eligibility in a matter of hours
- Collaborate across teams to lease up Project-Based Voucher units coming down the pipeline

### Human Resources

- Enhancing new hire orientation and on-boarding experience
- Developing staff recognition initiatives
- Implementing new recruitment technology

### Procurement

- Implement automated management systems
- Train all Agency Departments on updated Procurement procedures
- Update Procurement contract and solicitation templates

### Information Technology & Facilities

- Implement and launch Yardi agency wide
- Implement security enhancements to agency’s network
- Incorporating more energy efficient HVAC and lighting systems

### Finance

- Assist other departments with HCV Yardi conversion and implementation
- Improve external and internal reporting
- Develop and implement construction module in Yardi

### Innovation & Impact

- Draft annual MTW Plans and Reports
- Reviewing and updating PBV policies
- Working with community partners to expand collaborative efforts

### Real Estate – Asset Management

- Develop written policies and procedures for Replacement Reserve accounts and withdrawals
- Complete implementation of MRI across portfolio
- Create dashboard with key performance metrics

### Real Estate - Development

- Construction continues at Alvarado Park Senior Housing (89 units) and Bellarmino Place Family Housing (115 units).
- Construction will begin for at Hawthorne, a 107-unit property reserved for chronically homeless families.
- Capital repairs and rehabilitation for several newly acquired properties - Jardines Paloma Blanca, Girasol Housing, Las Golondrinas Apartments, and Rincon de los Esteros.

## PBV Pipeline

SCCHA's PBV pipeline is detailed in Section II of this Plan. Several of the projects completing construction in FY2025 have come through the County's \$950 million Measure A bond, which provides funds for the development of affordable housing and permanent supportive housing. Attaching vouchers to the Measure A development funds ensures that units will be affordable for the County's vulnerable populations, and that new construction properties will have sufficient and long-lasting operating revenue. SCCHA is committed to making available as many additional PBVs in support of Measure A as HUD regulations and funding availability allow.

Projects awarded through the Housing Authority's 2020 RFP are also finishing construction and will be leasing up in FY2025. Two and 3-bedroom units were the focus of the 2020 RFP and the families for those units come from the Housing Authority's wait list. The projects in the PBV pipeline will increase the local affordable housing stock by over 2,300 units, at least 650 of those supported by PBVs, once all units are constructed. In FY2025 9 projects are expected to finish construction, bringing 331 PBVs online, most set aside for chronically homeless families being added to the affordable housing stock.

In FY2025 SCCHA plans to work with local developers in strategizing future PBV awards.

## New Proposed Activities for FY2025

In FY2025 and beyond, SCCHA intends to align the MTW Plan more closely with the strategic goals of the agency. Serving residents and prioritizing the needs of the local community will be the guiding focus of the proposed initiatives.

SCCHA is proposing one new activity in this year's Plan. The activity is in response to the HUD-issued Federal Register Notice requiring SCCHA to implement Small Area Fair Market Rates. The goal of the activity is to protect families from displacement.

SCCHA is requesting an amendment of the FY2025 MTW Annual Plan (first submitted to HUD April 12, 2024, approved June 7, 2024) to waive or modify certain program policies resulting from the Housing Opportunity Through Modernization Act (HOTMA) sections 102 and 104. Full details of the proposed activities can be found in Section III of this MTW Plan.



## Overview of SCCHA's MTW Activities

**Note:** Closed Out Activities 2009-3, 2009-4, 2009-6, 2009-7, 2009-10, 2009-12, 2010-1, 2012-1, 2014-1a, 2014-1b, 2014-2, 2015-1, 2016-1, 2018-1, and 2020-6 are not shown.

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	REDUCE COST & ACHIEVE GREATER COST EFFECTIVENES S IN FEDERAL EXPENDITURE S	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2009-1 (Amended in FY2016; and FY2021)	Reduced Frequency of Tenant Reexaminations	X	X	
2009-2	Expediting the Initial Eligibility Income Verification Process	X		
2009-5	Exploring New Housing Opportunities for the Chronically Homeless			X
2009-8	30-Day Referral Process for Project-based Vacancies	X		
2009-9	Utilization of Low-Income Housing Tax Credit (LIHTC) Tenant Income Certification (TIC) for Income and Asset Verification	X		
2009-11	Project-Base 100 Percent of Units in Family Projects			X
2009-13	Combined Waiting Lists for the County of Santa Clara and the City of San José	X		
2009-14 (amended in FY2014)	Payment Standard Changes Between Regular Reexaminations	X		
2010-2	Excluding Asset Income from Income Calculations for Families with Assets Under \$50,000	X		
2010-3	Applying Current Increased Payment Standards at Interim Reexaminations	X		
2010-4 (amended in FY2023)	Allocating Project-Based Vouchers to SCCHA-Owned Projects Without Competition	X		
2010-5**	Assisting Over-Income Families Residing at SCCHA-Owned Project Based Voucher Properties			X

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	REDUCE COST & ACHIEVE GREATER COST EFFECTIVENES S IN FEDERAL EXPENDITURE S	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2011-1	Streamlined Approval Process for Exception Payment Standard for Reasonable Accommodation – HCV			X
2011-2	Simplify Requirements Regarding Third-Party Inspections and Rent Services	X		
2012-2	Minimum Two-year Occupancy in Project-Based Unit	X		
2012-3	Create Affordable Housing Acquisition and Development Fund	X		X
2012-4	Create Affordable Housing Preservation Fund for SCCHA- and Affiliate-Owned Properties	X		X
2012-5**	Expand Tenant Services at SCCHA or Affiliate-Owned Affordable Housing Properties		X	
2013-1	Elimination of the Earned Income Disallowance (EID) Calculation	X		
2014-3**	Freeze on Contract Rent Increases	X		
2014-4 (amended in FY2015 & FY2024)	Increased Tenant Contribution—Up to 35 Percent of Gross Income	X		
2015-2	Project-Based Voucher Inspection Self-Certification	X		
2015-3	Modify Elderly Definition for PBV			X
2016-2	Streamlining of PBV Selection Requirements		X	
2017-1	Phasing in the Subsidy Standard Change	X		
2017-2	Special Needs Population Direct Referral Program			X
2017-3 (amended in FY2018, FY2019, & FY2024)	Landlord Initiatives			X
2017-4*	Setting the Payment Standards Above 110 Percent of HUD Fair Market Rents			X
2019-1*	Graduation Bonus		X	
2019-2	Family Self-Sufficiency Program- Waive Contract of Participation Requirements		X	

MTW Statutory Objectives				
ACTIVITY # (PROPOSED PLAN YEAR + ACTIVITY #)	ACTIVITY	REDUCE COST & ACHIEVE GREATER COST EFFECTIVENES S IN FEDERAL EXPENDITURE S	PROVIDE INCENTIVES TO FAMILIES LEADING TOWARD ECONOMIC SELF- SUFFICIENCY	INCREASE HOUSING CHOICES FOR LOW- INCOME FAMILIES
2019-3	Waiving the Requirement that a PHA Re-Determine Rent Reasonableness for Manufactured Home Spaces Annually	X		
2019-4	Streamlining the Lease-Up Process	X		X
2020-1	Increase Percentage of Project based Vouchers (PBV)			X
2020-2	Interim Housing			X
2020-3	Over Housed/Under Housed Project Based Voucher (PBV) Households			X
2020-4	Rent to Owners & Rent Reasonableness			X
2020-5**	Eliminate the 40% of Income Cap at Initial Leasing			X
2021-1	Impose Limits on PBV to HCV Conversion	X		X
2021-2	Simplify Minimum Rent Hardship Exemption	X	X	
2022-1*	Homeownership and Asset Limit for Eligibility	X		
2022-2*	Waive Full-Time Student Income Exclusion for Families Which Earn 80% of Area Median Income	X		X
2022-3*	Mainstream Turnover Voucher Issuance Flexibility			X
2022-4*	Modified PBV Contract Rents	X	X	
2023-02	Strive Scholarship		X	
2024-01*	Digital Inclusion		X	
2024-02*	Rental Assistance for Post-Secondary Education Students with Children		X	X
2024-03*	Short-Term Bridge Loan			X
2024-04	Streamline Offer of New Lease Process	X		
2024-05	Buena Vista Mobile Home Park			X

\* Activities Not Yet Implemented

\*\* Activities on Hold

## II. General SCCHA Operating Information

### A. HOUSING STOCK INFORMATION

#### i. Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
None	0	0	0	0	0	0	0	None	0	0
None	0	0	0	0	0	0	0	None	0	0
None	0	0	0	0	0	0	0	None	0	0

Total Public Housing Units to be Added in the Plan Year

0

\* Select "Population Type" from: General, Elderly, Disabled, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

N/A

#### ii. Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
None	0	N/A

Total Public Housing Units to be Removed in the Plan Year

0

**iii. Planned New Project Based Vouchers**

Tenant-based vouchers that the MTW PHA anticipates project-basing 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) will be 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 TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
797 Almaden	35	No	New construction project consisting of both family and special needs units. Of the 98 total units, 10 family units and 25 units for chronically homeless families will be supported by PBVs.
961 Meridian	38	No	New construction family and veterans project. 38 family units will be supported with MTW PBVs, while 35 units for veterans will be supported with HUD-VASH PBVs.
Distel Circle	27	No	New construction project consisting of 88 total units. 27 MTW PBVs are set aside for large families and chronically homeless families.
EAH Blossom Hill	6	No	New construction project consisting of 84 total units. 6 family units will be supported with PBVs.
Hawthorn	48	No	New construction project consisting of 103 total units. 26 family units and 22 chronically homeless units will be supported with PBVs.
Magnolias	23	No	New construction project consisting of 66 total units. 16 MTW PBV units are set aside for chronically homeless families and 7 units are for veterans supported by HUD-VASH PBVs.
Mil on Main	55	No	New construction project consisting of 219 total units. 55 MTW PBVs are for large families
Mountain View Lot 12	25	No	New construction project consisting of 120 total units. 25 MTW PBV units are for large families.
Rincon de los Esteros	120	No	Existing project acquired by the Housing Authority. MTW PBVs will support 120 family units

377

**Planned Total Vouchers to be Newly Project-Based**

**iv. Planned 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 is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
2275 Ellena Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
2287 Pasetta Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
777 West San Carlos	16	Committed	No	New construction project consisting of both family and special needs units. Of the 154 total units, 16 family units will be supported by PBVs.
Mariposa Place (formerly 750 West San Carlos)	40	Committed	No	New construction family project consisting of 80 total units. 40 PBVs will support the project, directed towards those with special needs.
The Algarve	36	Committed	No	91 affordable units, 46 supported by PBVs - 36 for chronically homeless individuals and families, and 10 for HUD-VASH
Alum Rock	26	Committed	No	New construction family project consisting of 60 total units. 26 family units will be supported with MTW PBVs.
Alvarado	41	Committed	No	New construction senior project consisting of 90 total units. 41 senior units will be supported with PBVs.
Agrihood Senior Apartments	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.
Anne Way Residence	4	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Auzerais	64	Committed	No	Family project consisting of 128 total units. 64 PBVs will support the project, directed toward the homeless and those with special needs.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Bascom	11	Committed	No	Family project consisting of 90 total units. 11 will be supported with MTW PBVs and 5 with HUD-VASH PBVs.
Bellarmino	53	Committed	No	New construction family project consisting of 116 total units. 29 family units and 24 permanent supportive housing units will be supported with PBVs.
Blossom Hill Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Calabazas	80	Leased/Issued	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	Leased/Issued	No	Family project consisting of 121 Studio units. PBV units are for disabled persons.
Casa De Novo	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	Leased/Issued	No	Family project consisting of 60 studio units. PBV units are for chronically homeless families.
Charities Blossom Hill	49	Leased/Issued	No	Senior project consisting of 147 total units. 49 PBVs will support the project for seniors with special needs.
The Charles	44	Committed	No	New construction project consisting of 99 total units. 44 family units will be supported with PBVs.
Connell Apartments	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	Leased/Issued	No	Senior project consisting of 199 1-bedroom units. PBV units are for persons aged 55 years and over.
Corinthian House	6	Leased/Issued	No	Senior project consisting of 102 units (62 studios and 40 1-bedroom). PBV units (1-bedroom)



PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				are for persons aged 62 years and over.
Country Hills	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	Leased/Issued	No	Senior project consisting of 48 1-bedroom units. PBV units are for persons aged 62 years and over.
Crest Avenue Apartments	4	Leased/Issued	Yes	RAD conversion of former Mod Rehab project with four 2-bedroom units.
Crossings on Monterey	20	Leased/Issued	No	Family, new construction project, consisting of 39 units (6, 1-bedroom, 18, 2-bedroom and 15, 3-bedroom). PBV units are for chronically homeless families.
Curtner SRO's	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	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	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	Leased/Issued	No	Family project consisting of 101 units (92 studio and 9 1-bedroom). PBV units are for chronically homeless families.
Eagle Park	16	Leased/Issued	No	14 Studio and 2 1-bedroom units. PBVs are for the chronically homeless and those with special needs.
Edwina Benner Plaza	23	Leased/Issued	No	Family new construction project consisting of 66 total units. 23 PBVs for families and those with special needs.
Eklund Gardens I Apartments	10	Leased/Issued	No	Family project consisting of 10 2-bedroom units. PBV units are for families.
Eklund Gardens II Apartments	6	Leased/Issued	No	Family project consisting of 6 3-bedroom units. PBV units are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Emerson North	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Emerson South	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Fair Oaks Senior Plaza	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	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Ferne	1	Leased/Issued	No	Family project consisting of 16 2-bedroom units. PBV unit is for families.
Fuji Towers	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.
Gallup & Mesa	23	Leased/Issued	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.
Gish Apartments	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	132	Leased/Issued	No	132 total units, with 100 supported by Mainstream Program PBVs and 32 PBV units for the chronically homeless.
Homestead SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
Jamesi Village (North San Pedro Apartments)	60	Leased/Issued	No	Family and veteran's new construction project, with 135 total units. 60 PBVs will be dedicated to the chronically homeless and 49 for HUD-VASH.
Immanuel-Sobrato	97	Leased/Issued	No	106 total units for the chronically homeless, 97 supported with PBVs

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Julian Gardens	9	Leased/Issued	No	Family, new construction project, consisting of 9 3-bedroom units. PBV units are for families.
Kifer Senior	33	Leased/Issued	No	New construction project consisting of 80 total units. 33 MTW PBVs will support units for the chronically homeless and 8 HUD-VASH PBVs will support units for veterans.
Kings Crossing Apartments	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 SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
La Avenida	7	Committed	No	New construction project consisting of 100 total units. 7 units for the chronically homeless will be supported with MTW PBVs and 25 units for veterans will be supported by HUD-VASH PBVs.
Laurel Grove Family Apartments	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	Leased/Issued	No	New construction senior project, 100% PBVs for seniors.
Lenzen Gardens Senior Apartments	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	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Lucretia Gardens	16	Leased/Issued	No	Family project consisting of 16 3-bedroom units. PBV units are for families.
Markham Plaza I (Tully Gardens)	20	Leased/Issued	No	152-unit family project with 10 SRO PBV units for disabled

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				families and 10 PBV units for chronically homeless families.
Maryce Freelen Place	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.
Met South	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	Leased/Issued	No	Family project consisting of 16 units (8 1-bedroom and 8 2-bedroom). PBV units are for families.
Mitchell Park	25	Committed	No	New construction project consisting of 50 total units. 25 MTW PBV units will be set aside for families with special needs.
Monroe Street	8	Leased/Issued	No	Family project consisting of 65 total units. 8 family units will be supported with PBVs.
Monticelli Apartments	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.
Monterey Gateway	37	Leased/Issued	No	Senior, new construction project, consisting of 75 units (64, 1-bedroom and 11, 2-bedroom). PBV units are for chronically homeless and homeless seniors.
Moulton Plaza	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.
Onizuka Crossing - CHDR	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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Opportunity Center	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.
Orchard Ranch (Palomino)	18	Leased/Issued	No	Family, new construction project, consisting of 18 total units. PBV units are for large families, those with special needs, and chronically homeless families.
Orchard Ranch (Overo)	8	Leased/Issued	No	Family, new construction project, consisting of 8 units. PBVs are for those at risk of homelessness.
Orchard Ranch (Tobiano)	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.
Page Street	27	Leased/Issued	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.
Park Avenue Senior Housing	99	Leased/Issued	No	Senior, new construction, 94 1-bedroom, 5 2-bedderoom. PBV units are for persons aged 55 years and over.
Parkmoor Apartments	41	Committed	No	New construction project with 79 total units. 20 of the PBVs will be for chronically homeless families and 21 PBVs will be for low-income families
Parkside Studios	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	Leased/Issued	No	Senior project consisting of 140 1-bedroom units. PBV (24 1-bedroom) units are for persons aged 55 years and over.
Pavilion Inn	21	Committed	No	Rehabilitation project consisting of 43 units. 21 MTW PBV units are set aside for families with special needs.
Poco Way Apartments	10	Leased/Issued	No	Family project consisting of 130 units (14 1-bedroom, 54 2-

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				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 SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Quetzal Gardens	32	Leased/Issued	No	Family, new construction project, consisting of 70 total units. 32 PBVs dedicated to large families, those with special needs, and the chronically homeless.
Renascent Place	160	Leased/Issued	No	Family, new construction project, consisting of 160 units. PBV units are for chronically homeless families.
Rincon Gardens Senior Apartments	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.
Roosevelt Park	20	Committed	No	New construction project consisting of 80 total units. 20 family units will be supported with PBVs.
Royal Oak Village	22	Committed	No	Family project consisting of 73 total units. 22 PBVs will support large families.
San Antonio Place	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	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.
Sango Court	40	Leased/Issued	No	Family project consisting of 101 total units. 40 MTW PBVs will support the project, directed toward the homeless and those with special needs. 7 HUD-VASH PBVs will also support the project.
Santa Familia	13	Leased/Issued	No	Family project consisting of 79 units (30 1-bedroom, 23 2-bedroom, and 26 3-bedroom).

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				PBV units (4 1-bedroom, 4 2-bedroom, and 5 3-bedroom) are for families.
Second Street Studios	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	Leased/Issued	No	Family, new construction project, consisting of 61 total units. 20 PBVs for those at risk of homelessness.
Sobrato Apartments	40	Leased/Issued	No	Existing project with 40 PBVs for chronically homeless families.
Sonora Court	30	Committed	No	New construction family project consisting of 177 total units. 30 family units will be supported with PBVs.
Stevenson House	10	Leased/Issued	No	Senior project consisting of 120 studio and 1-bedroom units. PBV units (6 studio and 4 1-bedroom) are for persons aged 62 years and over.
Sunnyvale Block 15	22	Leased/Issued	No	New construction project consisting of 90 total units. 22 family units will be supported with PBVs.
Sunset Gardens Senior Apartments	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.
Tamien Station	33	Committed	No	New construction project consisting of 134 total units. 33 family units will be supported with MTW PBVs.
Timberwood Apartments	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.
Tyrella Gardens Apartments	11	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.



PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Vela Apartments (Alum Rock Family Housing)	29	Leased/Issued	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.
Ventura	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units is for families.
Ventura Apartments	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units is for families.
Veranda	6	Leased/Issued	No	Senior, new construction project, consisting of 19 units. 6 studio PBV units are for persons aged 55 years and over.
Village at Willow Glen	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 at Fourth Street	93	Leased/Issued	No	New construction permanent supportive housing project with 93 PBVs for the chronically homeless.
Villas on the Park	83	Leased/Issued	No	Family project consisting of 83 units. PBVs are for the chronically homeless.
Waldo	3	Leased/Issued	No	Family project consisting of six 1- and 2-bedroom units. Three 1-bedroom PBV units are for families.
Westwood Ambassador	10	Leased/Issued	Yes	10 PBVs units for former Mod Rehab project.
Wheeler Manor	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 SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.

3,599

Planned Total Existing Project-Based Vouchers

**v. Planned Other Changes to MTW Housing Stock Anticipated During 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.

**PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR**

SCCHA does not anticipate holding any units off-line or acquiring or developing any additional local, non-traditional units during the Plan year.

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

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

**GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR**

Construction continues at Alvarado Park Senior Housing (89 units) and Bellarmino Place Family Housing (115 units).

The first phase of the East Santa Clara site (ESC), Hawthorn, will be using MTW funds for planning and pre-development work in FY2025 in addition to starting construction. Subsequent (ESC) phases, including Sage and Trillium, will be using MTW funds for planning and pre-development work as well.

The site at Autumn/Montgomery will use MTW funds in FY2025 for predevelopment and due diligence activities.

Buena Vista and Willows will use MTW funds for planning and pre-development as they prepare for funding applications to leverage outside resources.

As part of the North First Street project (formerly SureStay), located at 1488 N. 1st St, San Jose, SCCHA plans to spend up to \$5M to continue predevelopment activities.

MTW funds are planned for capital repairs and rehabilitation of several newly acquired properties, Jardines Paloma Blanca, Girasol Housing, Las Golondrinas Apartments, and Rincon de los Esteros.

**B. LEASING INFORMATION****i. Planned Number of Households Served**

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	48	4
MTW Housing Choice Vouchers (HCV) Utilized	219,588	18,299
Local, Non-Traditional: Tenant-Based^	4,320	360
Local, Non-Traditional: Property-Based^	11,304	942
Local, Non-Traditional: Homeownership^	0	0
<b>Planned Total Households Served</b>	<b>235,260</b>	<b>19,605</b>

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
Tenant-Based	Interim Housing - Activity 2020-2	4,320	360
Property-Based	Create Affordable Housing Preservation Fund for SCCHA and Affiliate-Owned Properties/Activity 2012-4	11,304	942
Homeownership	N/A	0	0

\* “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

\*\* “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.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

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

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None
MTW Housing Choice Voucher	The Santa Clara County rental market continues to have a low vacancy rate, which leads to difficulties in leasing Housing Choice Vouchers. HCV holders who are looking for housing continue to face extremely high rents and a competitive rental environment. The Housing Authority will implement Small Area FMRs in January, 2025. Community partners continue to assist voucher holders in their housing search. The Development team has a robust pipeline to expand affordable housing supply. Project-Based Vouchers continue to be instrumental in affordable housing production within the County. Approximately 457 MTW PBV units are anticipated to complete construction in FY2025.
Local, Non-Traditional	None

**C. WAITING LIST INFORMATION****i. Waiting List Information Anticipated**

Snapshot information of waiting list data as anticipated at the beginning 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	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Public Housing Units	Site Based	685	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific*	36,100*	Open	Yes
Project-Based, Local, Non-Traditional MTW Housing Assistance Program	Site Based	2,400	Partially Open	Yes

\* SCCCHA's Interest List opened in December 2020. Smaller 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:**

SCCHA has 11 properties where households are assisted through Project-Based, Local, Non-Traditional MTW Housing Assistance Programs. Buena Vista Mobile Home Park does not have a waitlist. There may be duplication of applicants among the remaining lists as applicants can put their name on as many lists as are open. The number of people on the waitlists for the rest of the projects are as follows: 107 for Morrone Gardens, 110 for DeRose Gardens, 91 for El Parador Apartments, 39 for San Pedro Gardens Apartments, 486 for Pinmore Gardens Apartments, 150 for Blossom River Apartments, 600 for Helzer Court Apartments, 260 for Clarendon Apartments, 240 for Bendorf Drive Apartments, 317 for Ford Road Plaza.

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

Please describe any anticipated 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 PLANNED CHANGES TO WAITING LIST
Federal MTW Housing Choice Voucher Program	There are no planned changes to the waiting/interest list.

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

This section describes the MTW activity that SCCHA proposes to implement in FY2025.

#### 2025-01: SMALL AREA FAIR MARKET RENTS

*(Proposed Activity)*

#### Activity Description

SCCHA proposes a modified implementation of Small Area Fair Market Rents (SAFMRs) for setting HCV payment standards. Currently, SCCHA sets payment standards based on the Fair Market Rents (FMRs) that HUD publishes annually for each metropolitan area. The payment standards are used to calculate the maximum subsidy that SCCHA will pay for voucher holders. Under a recent HUD-issued Federal Register Notice (FR-6426-N-01), SCCHA will be required to use SAFMRs, which are based on zip codes, instead of the metro area FMRs. SAFMRs are intended to better reflect the rental market in individual zip codes, making more neighborhoods affordable for voucher holders. SAFMRs increase the value of the voucher in more expensive neighborhoods, but also reduces it in lower-cost neighborhoods.

Santa Clara County has one of the most expensive rental markets in the country. While there are significant variations in market rents by neighborhood, the lack of affordable housing is a challenge impacting all communities in the county. Strategies to affirmatively further fair housing must include expanding affordable housing access to more neighborhoods, as well as preserving affordable housing in low-income communities to mitigate displacement.

The current SAFMR rule requires payment standards set between 90% to 110% of the SAFMR in each zip code. With this requirement, SCCHA estimates it would need to reduce payment standards in 18 ZIP codes, where 7,500 (48%) HCV households currently live, and that 2,400 of these households would get a reduction in subsidy without a hold harmless policy in place. This would have a disproportionate impact on Hispanic and Asian households, as the ZIP codes with the lowest SAFMRs and highest voucher concentrations are in predominately Hispanic/Asian neighborhoods. Housing authorities may adopt a hold harmless policy that would protect existing voucher holders from payment standard decreases as long as the household continues to receive voucher assistance in their current unit. However, it would not apply to new program families or existing program families who lease a new unit with their voucher assistance after the new payment standards go into effect.

SCCHA is proposing to modify the SAFMR rule such that the agency could set payment standards exceeding 110% of SAFMR in certain zip codes to mitigate involuntary displacement. SCCHA may consider multiple factors, including but not limited to:

1. Disparity between SAFMR and actual rents based on third-party market reports and HCV program data,

2. The number of families that would be negatively impacted by a reduction in payment standards,
3. Disparate impacts by race/ethnicity or family types,
4. Alignment with city/county strategies targeting areas for anti-displacement or revitalization efforts.

This flexibility will help SCCHA balance the goals of expanding affordable housing access to more areas, while also preserving affordability in lower-cost communities. SCCHA will continuously monitor the impact and efficacy of its payment standards through metrics such as third-party rental data, per-unit cost, tenant rent burden, locational outcomes, voucher success rates, voucher utilization rates, and total voucher households served.

### Relation to Statutory Objectives

This activity supports the statutory objective of increasing housing choice.

### Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in this fiscal year, with the new payment standards going into effect January 1, 2025.

### Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2025-01: Small Area Fair Market Rents				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>HC #2: Units of Housing Preserved</b>				
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	0	300	300	N/A

### Cost Implications

SCCHA anticipates that the proposed activity could increase HAP expenditures by an estimated \$1 million in the first year, when compared to implementing a standard hold harmless policy without this activity. SCCHA will monitor actual HAP expenditures after implementation and consider cost impacts when updating payment standards on an annual basis.

### Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D, Section 2, Subsection a. of SCCHA's MTW Agreement with HUD and waives certain provisions of Sections 8(o)(1), 8(o)(2),

8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518, as necessary to implement SCCHA's MTW Plan. This authorization is needed to establish local payment standards outside of the basic range of the applicable SAFMRs in certain zip codes.

## Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2025 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

### 2009-1: REDUCED FREQUENCY OF TENANT RE-EXAMINATION

*(Re-Proposed Activity)*

#### Activity Description

This activity, originally implemented in 2009, reduces the frequency of participant reexaminations in the voucher program. Participants with fixed incomes are reexamined every three years and participants with non-fixed incomes are reexamined every two years. In FY2015, SCCHA amended this activity to include its four public housing units under the new reexamination schedule. By including its public housing units under the modified reexamination schedule, SCCHA will be furthering administrative streamlining and labor savings for both its Section 8 and 9 programs.

In FY2020, SCCHA re-proposed this activity as a technical amendment in response to the widespread economic disruption caused by the COVID-19 pandemic. The re-proposed activity assigned MTW participants with non-fixed incomes to a three-year regular re-examination cycle, and MTW participants with fixed incomes to a four-year cycle. This re-proposed activity took effect immediately as a technical amendment, bypassing the public notice and comment period and was intended to last until June 30, 2021 or six months after the shelter-in-place orders have been lifted, whichever is longer.

SCCHA re-proposed Activity 2009-1 as a technical amendment again in FY2021, extending the amendment from FY2020 due to the ongoing impact of the COVID-19 pandemic. The FY2021 amendment extends this modified activity through FY2023 (ending June 30, 2023).

SCCHA is re-proposing this activity to maintain its policies for when an interim reexamination must be performed due to a change in the family's annual income between regularly scheduled reexaminations. This activity waives certain interim reexamination requirements being implemented through the Housing Opportunity Through Modernization Act (HOTMA). SCCHA will only process increases in income between regularly schedule reexaminations in the following cases:

- To include the income of a family member being added to the household;



- When a zero-income family reports an increase in income;
- To include previously uncounted income during an interim reexamination that would otherwise make the family zero-income;
- If a family that is in a repayment agreement with SCCHA reports an increase in income;
- If the participant requests an interim reexamination for increases in their income;

All other income increases will be processed at the next regularly scheduled reexamination. SCCHA will continue to process interim reexaminations for any decrease in family income.

### Relation to Statutory Objectives

This activity supports the statutory objectives of delivering services in a cost-effective manner and in ways that reduce administrative costs.

### Anticipated Schedule for Achieving the Stated Objectives

SCCHA will implement this re-proposed activity immediately upon approval.

### Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2009-1: Reduced Frequency of Tenant Reexaminations				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>CE #1: Agency Cost Savings</b>				
Total cost of task in dollars (decrease).	\$2,422,393	\$1,211,197	\$1,211,197	N/A
<b>CE #2: Staff Time Savings</b>				
Total time to complete the task in staff hours (decrease).	68,936	34,468	34,468	N/A
<b>CE #5: Increase in Tenant Rent Share</b>				
Tenant rent share in dollars (increase).	\$8,065,166	\$8,065,166*	\$8,065,166	N/A
<b>SS #1: Increase in Household Income</b>				
Average earned income of households affected by this policy in dollars (increase).	\$23,021	\$23,021**	\$23,021	N/A
<b>SS # 3: Increase in Positive Outcomes in Employment Status</b>				
Number of Head of Households employed.	4,317	4,317*	4,317	N/A

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*	436	N/A
Number of Head of Households in Other Category (ex: receiving TANF, SSI, Child Support, General Assistance, etc.).	15,211	15,211*	15,211	N/A
<b>SS # 4: Households Removed from Temporary Assistance for Needy Families (TANF)</b>				
Number of households receiving TANF assistance (decrease).	1,955	1,955*	1,955	N/A
<b>SS #8: Households Transitioned to Self-Sufficiency</b>				
Number of households transitioned to self-sufficiency (increase).*****	322	322**	322	N/A

\*SCCHA does not anticipate that this activity will increase 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.

## Cost Implications

SCCHA anticipates that the re-proposed activity will save staff time and effort that would otherwise be spent on calculating interim reexaminations.

## Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph C(4) and Paragraph D(1) of SCCHA's MTW Agreement with HUD and waives certain provisions of Sections 3(a)(1), 3(a)(2) and Section 8 of the 1937 Act and 24 CFR 966.4, 960.257 and 982.516 as necessary to implement SCCHA's MTW Plan. This authorization is needed to change how often the agency must conduct regular re-examinations and interim reexaminations of participants.

## Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2025 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

### 2022-1: HOMEOWNERSHIP AND ASSET LIMIT FOR ELIGIBILITY

*(Re-Proposed Activity)*

## Activity Description

This activity, originally approved in FY2022, makes the following applicants ineligible for SCCHA's Section 8 program if they have at least one of the following:

1. \$100,000 or more in assets per family member\*; or
2. Present ownership interest in a suitable home\*\* in which they have a legal right to reside in located in one of these counties: Alameda, Contra Costa, Marin, Merced, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, San Benito, Solano, and Stanislaus Counties.

\*The asset limit of \$100,000 per family member would be assessed as a lump sum, regardless of individual ownership of each asset.

\*\*Units excepted from this rule are those that are part of SCCHA's homeownership program, units not suitable for occupancy (i.e. vacant land or condemned properties), units jointly owned with a non-household member, and those owned by VAWA participants.

SCCHA is re-proposing this activity to make additional modifications due to recent HUD regulations and guidance on HOTMA Section 104's asset limitation provision:

- SCCHA will use HUD's definition of net family assets in 24 CFR 5.603 to determine the value of assets that count towards the asset limitation.

- SCCHA will align with HUD regulations when determining whether a property is exempt from this requirement, which are currently:
  - Any property for which the family is receiving assistance under 24 CFR 982.620 (manufactured home)
  - Any property for which the family is receiving homeownership assistance under 24 CFR 982
  - Any property owned jointly with another individual who does not live with the family but who resides at the property
  - Any property owned by a family that includes a person under VAWA
  - Any property that the family is offering for sale
  - Any property that is not suitable for family occupancy under one of these categories:
    - Does not meet disability-related needs of the family
    - Is not sufficient for the size of the family
    - Is geographically located so that it creates a hardship for the family
    - Is not safe to reside in due to its physical condition
- SCCHA proposes expanding this activity to Public Housing units.
- SCCHA will adopt discretionary enforcement of the asset limitation at reexaminations in accordance with HUD regulations and guidance. SCCHA's enforcement policies will be outlined in the Administrative Plan (for Section 8) and ACOP (for Public Housing).

Under statutory requirements, families residing in units converting to Section 8 PBRA or PBV through the Rental Assistance Demonstration (RAD) are not subject to the asset limitation provision upon conversion. SCCHA is proposing an additional exemption from the asset limitation for residents that are given Public Housing or Section 8 assistance due to other property acquisition, redevelopment, or conversion activities.

### Relation to Statutory Objectives

This activity supports the statutory objectives of increasing housing choices by preventing displacement of families that would otherwise lose assistance without the higher asset limit or exemption.

### Anticipated Schedule for Achieving the Stated Objectives

SCCHA will implement this re-proposed activity when SCCHA fully implements HOTMA Section 104 asset limitation provision.

### Proposed Baseline, Benchmarks, Metrics and Data Collection

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

## Activity 2022-1: Homeownership and Asset Limit for Eligibility

Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>HC #4: Displacement Prevention</b>				
Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	28	15	15	

## Cost Implications

SCCHA anticipates that the re-proposed activity will not impact HAP expenditures significantly.

## Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph C(2) and Paragraph D(3)(b) of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 3 of the 1937 Act, 24 CFR 960.206 and 24 CFR 982 Subpart E, as necessary to implement SCCHA's MTW Plan. This authorization is needed to modify eligibility policies based on asset limitation that differ from the program requirements.

## Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2025 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

## 2025-02: INCOME EXCLUSIONS

*(Proposed Activity)*

### Activity Description

SCCHA proposes certain income exclusions that differ from the program requirements in order to support families' self-sufficiency and reduce administrative burden for staff and families:

#### Student Financial Assistance

Under HCV program regulations, any student financial assistance in excess of amounts needed to cover tuition and required fees and charges is included in income, with an exception for students 24 years or older with dependent children, for whom all student financial assistance received under Section 479B of the Higher Education Act ("Title IV HEA") is excluded from income, as well as other financial assistance used to cover tuition and required fees and charges. SCCHA proposes instead to exclude the full amount of student financial assistance from income, which will simplify the income calculation and verification process for staff and families, align Public Housing and HCV programs with the same income exclusion policy, and further support program participants who are pursuing higher education.

**Full-Time Student Earned Income and Adoption Assistance Payments**

Under HUD regulations, the earnings of a full-time student in excess of the dependent deduction amount are excluded from family income. Similarly, adoption assistance payments in excess of the dependent deduction amount are also excluded. Because these income types are partially excluded, staff must still fully verify and calculate the income amounts, even though in most cases the amount of income included is the same. Additionally, because SCCHA has eliminated the dependent deduction from its MTW programs, these families are not receiving the income deduction that would have offset the partial inclusion of income from full-time student earnings or adoption assistance. Therefore, SCCHA proposes to fully exclude full-time student earned income and adoption assistance payments from family income calculation.

**Guaranteed Basic Income**

Under new HUD regulations, payments from pilot guaranteed basic income (GBI) programs with discrete beginning and end dates may only be excluded in the final year of the pilot program, when the payments are considered nonrecurring income (defined as income that is not repeated beyond the coming year). In recent years, multiple GBI programs have been piloted within Santa Clara County that provide payments for longer than one year, which was considered temporary, nonrecurring or sporadic income and therefore excluded. Due to the new HUD regulations defining nonrecurring income, SCCHA proposes to fully exclude GBI payments in accordance with the agency's original policy. This will ensure GBI recipients will not be penalized for income that was previously excluded.

**Relation to Statutory Objectives**

This activity supports the statutory objective of achieving greater cost effectiveness.

**Anticipated Schedule for Achieving the Stated Objectives**

SCCHA anticipates implementing this activity effective January 1, 2025.

**Proposed Baseline, Benchmarks, Metrics and Data Collection**

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

Activity 2025-02: Income Exclusions				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<b>CE #1: Agency Cost Savings</b>				
Total cost of task in dollars (decrease)	\$10,261	\$0	\$0	N/A
<b>CE #2: Staff Time Savings</b>				
Total time to complete the task in staff hours (decrease)	292 hours	0 hours	0 hours	N/A
<b>SS #1: Increase in Household Income</b>				

Average earned income of households affected by this policy in dollars (increase)	\$28,055	\$29,000	\$29,000	N/A
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## Cost Implications

SCCHA anticipates that the proposed activity would increase HAP expenditures by around \$84,000 annually as result of excluding additional amounts of income from family rent calculation.

## Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph C(11) and Paragraph D(2)(a) of SCCHA's MTW Agreement with HUD and waives certain provisions of Section 3(a)(2), 3(a)(3)(A), Section 6(1), Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 CFR 5.603, 5.611, 5.628, 5.630, 5.632, 5.634, 960.255 and 966 Subpart A, 24 CFR 982.508, 982.503 and 982.518, as necessary to implement SCCHA's MTW Plan. This authorization is needed to adopt and implement income exclusions that differ from the currently mandated program requirements in the 1937 Act and its implementing regulations.

## Rent Reform Impact Analysis, Hardship Case Criteria, Annual Reevaluation and Transition Period

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2025 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity's implementation. The impact of this activity will be evaluated annually in SCCHA's MTW Report.

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

To date, SCCHA has had 65 activities approved by HUD. Of these, seventeen were closed out in previous years.

The first four numbers of each activity signify the fiscal year in which each activity was approved. Except where indicated in the activity status explanation, SCCHA does not anticipate any changes or modifications to the activities during the Plan year.

### Implemented Activities

#### ACTIVITY 2009-1: REDUCED FREQUENCY OF TENANT REEXAMINATIONS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2009 AMENDED: FY2016 and FY2021



### DESCRIPTION OF MTW ACTIVITY

This activity, originally implemented in 2009, reduces the frequency of participant reexaminations in the voucher program. Participants with fixed incomes are reexamined every three years and participants with non-fixed incomes are reexamined every two years. In FY2015, SCCCHA amended this activity to include its four public housing units under the new reexamination schedule. By including its public housing units under the modified reexamination schedule, SCCCHA will be furthering administrative streamlining and labor savings for both its Section 8 and 9 programs.

In FY2020, SCCCHA re-proposed this activity as a technical amendment in response to the widespread economic disruption caused by the COVID-19 pandemic. The re-proposed activity assigned MTW participants with non-fixed incomes to a three-year regular re-examination cycle, and MTW participants with fixed incomes to a four-year cycle. This re-proposed activity took effect immediately as a technical amendment, bypassing the public notice and comment period and was intended to last until June 30, 2021 or six months after the shelter-in-place orders have been lifted, whichever is longer.

### UPDATE ON MTW ACTIVITY

SCCCHA re-proposed Activity 2009-1 as a technical amendment again in FY2021, extending the amendment from FY2020 due to the ongoing impact of the COVID-19 pandemic. The FY2021 amendment extends this modified activity through FY2023 (ending June 30, 2023).

### PLANNED NON-SIGNIFICANT CHANGES

SCCCHA does not anticipate any non-significant changes to this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCCHA does not anticipate any significant changes to this activity.

## 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 SCCCHA to extend the time period in which application documents are valid, from 60 days to 120 days.

### UPDATE ON MTW ACTIVITY

Extending the documentation timeframe continues to provide administrative relief, both to applicants and to SCCCHA. SCCCHA will continue to use this activity in FY2025.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

SCCHA does not anticipate any significant changes to this activity and its authorizations.

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

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2011 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

The Chronically Homeless Direct Referral (CHDR) program was implemented in FY2011. The CHDR program increases housing choices and mobility by assisting the homeless population through a more targeted and efficient process than the standard voucher waiting list system. Following a housing-first model, identified chronically homeless families not on the voucher waiting list are referred for project-based housing assistance and connected to case management services with local service providers. In FY2016 SCCHA amended and extended its agreement with Santa Clara County's Office of Supportive Housing, which administers the referral of applicant and oversees the agencies providing intensive case management services

**UPDATE ON MTW ACTIVITY**

SCCHA continues to work closely with the County's Office of Supportive Housing to successfully house chronically homeless families through the County.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

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

**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

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.

### UPDATE ON MTW ACTIVITY

This activity was placed on hold in the FY2022 Plan, as SCCCHA intended to close this activity after transitioning to our online site-based waiting lists. However, we have found this flexibility continues to assist PBV property owners in filling vacancies; therefore, SCCCHA will continue to use this activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

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

### UPDATE ON MTW ACTIVITY

SCCCHA currently uses property-owner TIC documentation for initial eligibility and at each regularly scheduled reexamination to verify income and family composition.

### PLANNED NON-SIGNIFICANT CHANGES

SCCCHA does not anticipate any non-significant changes to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCCHA does not anticipate any significant changes to this activity and its authorizations.

## 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 housing projects that make supportive services available. Although services must be made available and families must be made aware of and encouraged to participate in these services, families do not need to participate in the supportive 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.

### UPDATE ON MTW ACTIVITY

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).

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations.

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

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2009 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

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

### UPDATE ON MTW ACTIVITY

SCCHA changed the structure of its waiting list system to a permanently open interest list, which was launched in FY2021. As with the waiting list, SCCHA operates one combined interest list for both the City of San José and County of Santa Clara. SCCHA will continue to operate this joint interest list for the Housing Choice Voucher (HCV) and the Project-Based Voucher (PBV) Programs.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

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

## 2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: FY2014

### DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to effectuate an immediate change in voucher size and its corresponding payment standard when changes in family composition or SCCHA's subsidy size policy occur between regular reexaminations. If the application of the new payment standard results in a decrease in the tenant's rent portion, the interim reexamination effective date will be the first of the month following the change. If the application of the new payment results in an increase in the tenant's rent portion, the interim reexamination effective date will be the first of the month following a 30-day notice to the tenant and owner.

### UPDATE ON MTW ACTIVITY

This activity continues to result in Housing Assistance Payment (HAP) cost savings by enabling the new payment standards to take effect at the time of an interim reexamination rather than at the next regular reexamination.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations.

## 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

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

**UPDATE ON MTW ACTIVITY**

SCCHA continues to save costs of staff time previously spent on this task.

**PLANNED NON-SIGNIFICANT CHANGES**

SCCHA plans to close out this activity in the FY2023 MTW Report as the Housing Opportunity Through Modernization Act of 2016 (HOTMA) makes this activity unnecessary.

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

SCCHA plans to close out this activity in the FY2023 MTW Report as the Housing Opportunity Through Modernization Act of 2016 (HOTMA) makes this activity unnecessary.

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

PLAN YEAR APPROVED: FY2010 IMPLEMENTED: FY2010 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This MTW activity allows the application of the current payment standard (if the payment standard has increased since the family's last regular reexamination) to the rental assistance calculation at interim reexaminations.

**UPDATE ON MTW ACTIVITY**

Since implementation in FY2010, SCCHA has met the statutory objective of reducing administrative costs and increasing housing choice for low-income families. SCCHA has realized savings in staff hours and cost of tasks.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

SCCHA does not anticipate any significant changes to this activity and its authorizations.

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

PLAN YEAR APPROVED: 2010 IMPLEMENTED: 2010 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This MTW activity allows the Agency to select SCCHA-owned housing for project-based assistance without a competitive process, saving both staff time and other costs that would be related to a competitive

process. As a result of this activity, SCCCHA is able to cost-effectively and efficiently ensure that these project-based units are available.

### UPDATE ON MTW ACTIVITY

SCCCHA awarded PBVs to a Housing Authority-owned project, Hawthorn and plans to self-award in FY2025 and following years, for the projects at the East Santa Clara site. The Housing Authority will also use this activity as opportunities are available.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 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 allows SCCCHA to approve any requests for an exception payment standard above 110 percent (not to exceed 120 percent) of the published Fair Market Rent (FMR) as a reasonable accommodation for persons with disabilities.

### UPDATE ON MTW ACTIVITY

This activity continues to improve SCCCHA's responsiveness to the needs of families with members who have disabilities, which provides increased housing choices by enabling them to secure an accessible unit more expeditiously.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCCHA does not anticipate any significant changes or modifications to this activity and its authorizations.

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

## SERVICES

PLAN YEAR APPROVED: FY2011 IMPLEMENTED: FY2011 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

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

In FY2021, SCCHA amended this activity to further eliminate remaining required tasks associated with this HUD requirement. Specifically:

- Establishing contract rents (initial rent to owner and redetermined rent to owner);
- Establishing term of initial and any renewal HAP contract;
- Determining rent reasonableness; and
- Assisting the family in negotiating the rent with the owner.

These requirements still occur but are completed by SCCHA staff. The complete elimination of this requirement by a third-party will continue to decrease costs and increase administrative streamlining at SCCHA.

### UPDATE ON MTW ACTIVITY

SCCHA is updating the activity to have PHA-owned units be inspected by SCCHA staff instead of an independent entity. This will expedite the lease-up process for families and to further increase administrative streamlining.

### PLANNED NON-SIGNIFICANT CHANGES

SCCHA is updating the activity to allow SCCHA staff to conduct inspections of SCCHA-owned units. There are no changes to the authorizations for this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: 2012 IMPLEMENTED: 2015 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

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



The activity does not apply to families:

- 1) with an approved reasonable accommodation that requires them to move;
- 2) who experience a change in family composition that affects unit size;
- 3) who present other compelling reasons to move out; or
- 4) who request a move under the Violence Against Women Act (VAWA).

To implement the activity, SCCHA created its own PBV Statement of Family Responsibility and PBV Tenancy Addendum forms to replace the HUD forms. The only change in the SCCHA versions of the forms is the two-year, rather than one-year, PBV residency requirement before tenants may move with continued housing assistance.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

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

### UPDATE ON MTW ACTIVITY

SCCHA's development activities will expand in FY2025. Development and financing efforts continue at Alvarado Park Senior Housing (89 units) and Bellarmino Place Family Housing (115 units).

The first phase of the East Santa Clara site (ESC), Hawthorn, will be using MTW funds for planning and pre-development work in FY2025 in addition to starting construction. Subsequent (ESC) phases, including Sage and Trillium, will be using MTW funds for planning and pre-development work as well. The site at Autumn/Montgomery will use MTW funds in FY2025 for predevelopment and due diligence activities. Buena Vista and Willows will use MTW funds for planning and pre-development as they prepare for funding applications to leverage outside resources. As part of the North First Street project (formerly SureStay), located at 1488 N. 1st St, San Jose, and a number of adjacent properties SCCHA plans to spend up to \$5M to continue predevelopment activities.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

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

**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**

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

**UPDATE ON MTW ACTIVITY**

SCCHA continues to use this activity to preserve the long-term stability and viability of existing SCCHA owned and affiliate owned housing. SCCHA plans to use approximately \$5 million in MTW funds for the rehabilitation of 20 units at San Pedro Gardens Apartments during FY2025. SCCHA is also planning to use approximately \$12M in MTW funds to complete upgrades at the Jardines, Paloma Blanca, Girasol Housing, and Las Golondrinas Apartments, associated with the acquisition from HUD. The Buena Vista Mobile Home Park will also be using funds in FY2025 for pre-development activities.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

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

**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 Earned Income Disallowance (EID) calculation. The agency implemented this activity in early FY2015. Since implementation, this activity continues to decrease staff time required to calculate a family's rent portion and reduces errors associated with calculating potential income exclusions.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

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

PLAN YEAR APPROVED: FY2014 IMPLEMENTED: FY2015 AMENDED: FY2015, FY2024

### DESCRIPTION OF MTW ACTIVITY

This activity simplified the calculation of Total Tenant Payment (TTP) to the higher of between 30 and 35 percent of the participant family's gross monthly income or \$50 (minimum rent). Originally implemented in FY2014, this activity eliminated all standard allowances and deductions, as well eliminated the inclusion of a utility allowance in the tenant rent calculation. The initial implementation of this activity increased the TTP to 35 percent as a cost-saving measure in response to diminished funds resulting from federal sequestration. In September 2014, the TTP was reduced to 32 percent, and then further reduced to 30 percent in February 2022. SCCHA re-proposed this activity in FY2015 to include its four public housing units. This activity provided significant costs savings to SCCHA by reducing the amount of Housing Assistance Payment (HAP) paid to landlords. Additionally, the simplified calculation freed up staff hours by streamlining this task. In FY2024 the range was updated to between 28 and 35 percent of the family's gross monthly income.

### UPDATE ON MTW ACTIVITY

This activity provides flexibility to rapidly respond to changes in the rental market. The Housing Authority continues to use the activity to maintain the agency's fiscal health while supporting its residents.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 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 approved and implemented in FY2015 and allows Project-Based Voucher owners and tenants to self-certify the correction of reported Housing Quality Standards (HQS) deficiencies within the 30-day period after the initial HQS inspection. This activity only applies to HQS deficiencies which are not life threatening. This activity reduces expenditures by eliminating the need for scheduling and conducting a re-inspection.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 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 year or older and elderly families to those whose head, spouse or co-head are 62 years of age or older. This activity modifies 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 to align with the definition used by several affordable housing developments in the area. Therefore, PBV sites which define elderly as 55 years of age and older are considered an elderly property.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

**PLANNED SIGNIFICANT CHANGES**

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

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

PLAN YEAR APPROVED: FY2016 IMPLEMENTED: FY2018 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This activity enables SCCHA to select Project-Based Voucher proposals without conducting a competitive selection process where: 1) the proposed project was previously selected for award through any form of open public solicitation or invitation process conducted by a Federal, State, or local government entity, where a proposal is selected subject to funding availability; and 2) the proposed project was selected by the other government entity within the last fifteen years. This activity also eliminates the regulatory requirement that the previous selection process not consider rental assistance for the proposed project and allows proposers to include PBV assistance in their calculations.

**UPDATE ON MTW ACTIVITY**

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

**PLANNED NON-SIGNIFICANT CHANGES**

There are no planned non-significant changes or modifications to this activity and its authorizations.

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

There are no planned significant changes or modifications to this activity and its authorizations.

**ACTIVITY 2017-1: PHASING IN THE SUBSIDY STANDARD CHANGE**

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2017 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

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

**UPDATE ON MTW ACTIVITY**

SCCHA continues to realize the ongoing benefit of reduced costs and an increase in the number of households served.

**PLANNED NON-SIGNIFICANT CHANGES**

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2019 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

This activity creates an exception to Section 8 waiting list regulations to create a direct referral program for certain special needs populations who are not best served through a waiting list (such as disabled individuals at risk of institutionalization or transition aged youth). This activity gives SCCHA the flexibility to work directly with community partners to rapidly house and provide supportive services to vulnerable populations.

### UPDATE ON MTW ACTIVITY

SCCHA continues to utilize this activity to expand housing opportunities for special needs populations.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

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

## ACTIVITY 2017-3: LANDLORD INITIATIVES (& RE-PROPOSED)

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2017 AMENDED: FY2018, FY2019, & FY2024

### DESCRIPTION OF MTW ACTIVITY

This activity originally authorized SCCHA to administer loyalty bonus payments to Section 8 landlords who re-rent their unit to SCCHA program participants. Implemented in March 2017, SCCHA re-proposed the activity in FY2018 to streamline the process of administering the vacancy payments originally based on 80 percent of the previous contract rent for up to 30 days. Approved by HUD, loyalty bonus payments are now set within the range of \$500 and \$1,500 – an amount that was determined to be reasonable after evaluating the program-wide contract rent average. Moderate Rehabilitation and Project-Based Voucher vacancy payments remain at 80 percent of the previous contract rent.

Re-proposed again in FY2019, Activity 2017-3 expanded the initiatives SCCHA offers landlords to increase and maintain rental units available for Section 8 families. Offering a one-time bonus payment for new

landlords between \$500 and \$2,500—based on a program-wide contract rent average, bonus payments provide new owners with an incentive to participate in the HCV program.

An update to the activity in FY2024 expanded the initiatives to include a landlord assurance fund which reimburses property owners for certain HCV tenant-caused physical damage costs, beyond normal wear and tear that exceed the security deposit amount, up to \$2,500.

This activity increases the number of HCV units that are re-leased to HCV participants, ensuring the long-term viability of units that will be available to HCV low-income tenants and provides an incentive for new owner participation in the HCV program.

### UPDATE ON MTW ACTIVITY

The activity allows SCCHA to continue to grow its partnerships with landlords and increase the number of rental units on the program.

### PLANNED NON-SIGNIFICANT CHANGES

All non-significant changes or modifications to this activity and its authorizations during FY2024 are described above.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2025

### DESCRIPTION OF MTW ACTIVITY

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

This activity is intended to increase the probability of participants securing a rental unit in a tight, high-cost rental market.

### UPDATE ON MTW ACTIVITY

SCCHA plans to implement this activity in FY2025.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 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 modifies certain aspects of the Family Self Sufficiency (FSS) program in order to reduce the administrative burdens on both the participant families and SCCHA, while broadening the pool of families who could benefit from the FSS program’s escrow savings account. First, the activity eliminates the requirement in the FSS Contract of Participation (CoP) (HUD Form 52560) that enrolling families must have been subject to an income reexamination within 120 days of the enrollment, and instead uses the family income as determined at the last regular reexamination, which may be up to two years prior to enrollment for families which are not on fixed incomes. Second, the activity allows the successful maintained employment of any adult member of the enrolled family – rather than just the Head of Household – to count towards the family’s FSS goals. As long as at least one adult family member completes the Individual Training and Services Plan, the family will be considered a “successful FSS completion” and will receive the escrow payout.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 2019-3: WAIVING THE REQUIREMENT THAT A PHA REDETERMINE RENT REASONABLENESS FOR MANUFACTURED HOME SPACES ANNUALLY

PLAN YEAR APPROVED: FY2019 IMPLEMENTED: FY2019 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to eliminate the HUD requirement that a PHA annually re-determine that the current rent to owner is a reasonable rent for rent charged for a manufactured home space. SCCHA continues 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.

### UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity for manufactured home space rentals in the HCV program.



**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

SCCHA does not anticipate any significant changes to this activity and its authorizations.

**2019-4: STREAMLINING THE LEASE UP PROCESS**

PLAN YEAR APPROVED: FY2019 IMPLEMENTED: FY2019 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This activity was designed to alleviate the delays associated with the processing and completion of the Request for Tenancy Approval (RFTA) packet, tenancy addendum, and lease. HUD approved a waiver of 24 CFR §982.162 and §982.308 as necessary to change the requirement of using Form HUD-52517 and to simplify and streamline what constitutes an approvable lease.

SCCHA created a new RFTA form that consolidated certain sections which required owners to input duplicative information. Additionally, SCCHA created a "Mandatory Lease Information" form which acts as an addendum to the owner's lease agreement. The goal of this form is to save staff time by providing the information HUD requires to be in the owner's lease on a single page that the tenant and owner will sign and submit along with the lease. This will save staff time because they will no longer need to sift through the entire lease to find the HUD required elements and simultaneously achieve faster approval of the HAP contract for owners.

**UPDATE ON MTW ACTIVITY**

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

**PLANNED NON-SIGNIFICANT CHANGES**

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

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

SCCHA does not anticipate any significant changes to this activity and its authorizations.

**2020-1: PBV PROGRAM CAP**

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

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This activity was approved in FY2020 and raises the percentage cap for the Housing Authority of the City of San José (HACSI) and the Santa Clara County Housing Authority (SCCHA) to 40% of the respective baseline number of vouchers and removes the restrictions on the types of allowable units.

### UPDATE ON MTW ACTIVITY

SCCHA will utilize this activity when the number of Project Based Voucher units exceeds the 20% Program Cap threshold.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations.

## 2020-2: INTERIM HOUSING

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: FY2024

### DESCRIPTION OF MTW ACTIVITY

This activity was approved in FY2020 and creates a local rental subsidy program to assist special needs populations. SCCHA is partnering with the City of San Jose and the County of Santa Clara to provide interim (short-term) housing to individuals and families who are approved for a Permanent Supportive Housing (PSH) unit to which SCCHA has attached a PBV, but the unit is not yet ready for occupancy. The interim housing will move these highly vulnerable clients off the street while they await their permanent home and will provide stability and allow case managers to begin engaging with the clients.

### UPDATE ON MTW ACTIVITY

SCCHA and the County entered into an Agreement for services for Pedro Street Interim housing on December 1, 2020. The first residents moved into the Pedro Street property in May 2021. In the first half of FY22 SCCHA and the County's Office of Supportive Housing collaborated to change the time of applicant move-in from after SCCHA approval to upon referral by the local Continuum of Care. If and when the applicant is approved by SCCHA, SCCHA pays for the interim housing costs from the time of move in until the permanent unit is ready for lease up. This change allows the applicant to be safely and stably housed while going through the eligibility processes of the property and SCCHA, instead of after SCCHA approval, which could be weeks to months after the original referral.

In FY2024 this activity was expanded to include providing funding for scattered site interim housing where the families housed aren't necessarily voucher holders and with partners other than just the City of San Jose and Santa Clara County. The Housing Authority will ensure compliance with HQS and other requirements set forth in PIH Notice 2011-45.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations.

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

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

This activity modifies SCCHA's subsidy standards for the Project-Based Voucher program 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.

### UPDATE ON MTW ACTIVITY

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes or modifications to this activity and its authorizations.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes or modifications to this activity and its authorizations.

## 2020-4: RENT TO OWNERS & RENT REASONABLENESS

PLAN YEAR APPROVED: FY2020 IMPLEMENTED: FY2020 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 (in comparison with comparable units in the current rental market). Occasionally, upon an owner's request for a rent adjustment of a specific amount (which can be done annually), the reasonable rent for the unit according to rental comparisons of similar units will not only **not** support the increased rent amount the owner is requesting but 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 the approved contract rent in these circumstances. Instead, SCCHA only reduces the approved contract rent in those cases (identified through owner-initiated rent increases) where the HUD-issued Fair Market Rents (FMRs) for the applicable bedroom size have dropped by 10% or more since the unit's last rent reasonableness review.

**UPDATE ON MTW ACTIVITY**

SCCHA utilizes this activity on an ongoing basis and will continue to utilize the activity.

**PLANNED NON-SIGNIFICANT CHANGES**

There are no planned non-significant changes or modifications to this activity and its authorizations.

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

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

**PLANNED SIGNIFICANT CHANGES**

There are no planned significant changes or modifications to this activity and its authorizations.

**2021-1: IMPOSE LIMITS ON PBV TO HCV CONVERSION**

PLAN YEAR APPROVED: FY2021 IMPLEMENTED: FY2022 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This activity waives the requirement that PBV tenants who have resided in a PBV unit for the minimum period and who request to move receive priority for continued tenant-based assistance. The activity limits PBV to HCV conversions to 10% of the number of HCVs that SCCHA will issue each year. The HCVs available for PBV to HCV conversions will be issued to interested and qualified PBV tenants on a first-come, first-served basis. When all of the available HCVs have been issued, any remaining interested and qualified PBV tenants will be carried over to the following year.

**UPDATE ON MTW ACTIVITY**

SCCHA will continue to use this activity.

**PLANNED NON-SIGNIFICANT CHANGES**

There are no planned non-significant changes to this activity.

**PLANNED CHANGES TO METRICS/DATA COLLECTION**

There are no planned changes to the metrics or data collection for this activity.

**PLANNED SIGNIFICANT CHANGES**

There are no planned significant changes to this activity.

**2021-2: MINIMUM RENT HARDSHIP EXEMPTION**

PLAN YEAR APPROVED: FY2021 IMPLEMENTED: FY2022 AMENDED: N/A

**DESCRIPTION OF MTW ACTIVITY**

This activity replaces HUD's Minimum Rent Hardship exemption with a simpler policy that better addresses the needs of SCCHA's participants. SCCHA's policy does not differentiate between a temporary and long-term hardship and does not require staff to track and receive payments from participants after the

hardship waiver is lifted.

Minimum rent is suspended beginning the first of the month following the hardship request and will continue until the family submits new sources of income. If the housing Authority determines there is no longer a financial hardship, the minimum rent will be reinstated on the first of the month following the determination.

### UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity.

### PLANNED NON-SIGNIFICANT CHANGES

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

### PLANNED CHANGES TO METRICS/DATA COLLECTION

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

### PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity and its authorizations.

## 2022-3: MAINSTREAM TURNOVER VOUCHER ISSUANCE FLEXIBILITY

PLAN YEAR APPROVED: FY2022 IMPLEMENTED: FY2022 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

This activity waives the PIH Notice 2020-01 requirements to issue turnover vouchers to wait list applicants and allows SCCHA to issue turnover vouchers to applicants who have been directly referred by SCCHA's partner agency. The 2017, 2018, and 2019 Mainstream Voucher Program Funding Opportunities encourage PHAs to partner with local Continuum of Care agencies for direct referrals and to create a preference for homeless or at-risk of homelessness Mainstream participants. In cases where eligible direct referral applicants who meet the preference for homelessness, at-risk of homelessness, institutionalized, or at-risk of institutionalization are unavailable, SCCHA plans to continue to utilize the interest/waiting list to fill Mainstream Program turnover vouchers.

### UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes to this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the metrics or data collection for this activity.

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes to this activity or its authorizations.

## 2023-2: STRIVE SCHOLARSHIP

PLAN YEAR APPROVED: FY2023 IMPLEMENTED: FY2023 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

The Strive Scholarship is an important part of SCCHA's Section 8 Program. The annual scholarships are awarded as unrestricted funds which can be used to offset the cost of tuition, fees, books, high-speed internet, transportation, groceries, or any other student-identified need. SCCHA allocates up to \$75,000 per year, which is divided among eligible applicants. The Housing Authority will supplement with non-MTW funds for awardees who are residents of an affiliate property or those who would otherwise not be eligible for an MTW award.

Eligibility requirements are: recipient of housing assistance through a subsidy program or a resident in an affiliate property, GPA of 2.5 and above, full-time enrollment in a course of study, received no more than three previous awards, a written recommendation, and a description of educational and professional goals.

Housing Authority staff review the applications and conducts the scoring evaluation in preparation for the awards and annual award celebration.

### UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes to this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the metrics or data collection for this activity.

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes to this activity or its authorizations.

## 2024-4: STREAMLINE OFFER OF NEW LEASE PROCESS

PLAN YEAR APPROVED: FY2024 IMPLEMENTED: FY2024 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

This activity streamlines its Offer of New Lease process by waiving the requirement to execute a new HAP contract due to changes in lease requirements governing utility or appliance responsibilities or the term of the lease. Staff will continue to update files and communicate changes to all parties involved. This

waiver will alleviate staff time and costs associated with the completion of a HAP contract, tenancy addendum, and lease.

### UPDATE ON MTW ACTIVITY

SCCHA implemented the activity for Offer of New Lease requests submitted after HUD approval of the FY2024 Plan.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes to this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the metrics or data collection for this activity.

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes to this activity or its authorizations.

## 2024-5: BUENA VISTA MOBILE HOME PARK

PLAN YEAR APPROVED: FY2024 IMPLEMENTED: FY2024 AMENDED: N/A

### DESCRIPTION OF MTW ACTIVITY

SCCHA and local partners purchased and improved the infrastructure and quality of life for the residents at Buena Vista Mobile Home Park to preserve affordable housing and prevent imminent displacement of residents living in one of the highest cost cities in the county. This activity provides Housing Choice Vouchers to residents who are permanently relocated, creates a direct referral program that allows residents who currently reside at the park to receive a project-based voucher upon move-in to their new permanent unit onsite, and provides project-based housing assistance to mobile home units. These flexibilities allow SCCHA to provide stability for residents during the redevelopment process.

### UPDATE ON MTW ACTIVITY

SCCHA implemented the activity upon HUD's approval of the FY2024 Plan.

### PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes to this activity.

### PLANNED CHANGES TO METRICS/DATA COLLECTION

There are no planned changes to the metrics or data collection for this activity.

### PLANNED SIGNIFICANT CHANGES

There are no planned significant changes to this activity or its authorizations.

## Activities Not Yet Implemented

### 2019-1: GRADUATION BONUS

PLAN YEAR APPROVED: FY2019

PLAN YEAR AMENDED: FY2022

This activity, re-proposed and approved in FY2022, reduces the time a zero HAP participant's assistance is terminated from 180 days to 60 days. Families with annual incomes at or above 80% of Area Median Income (AMI) will be paid a graduation bonus of \$2,000 per eligible individual and removed from the Section 8 program 60 days after the family's income has been certified by SCCCHA and written notice has been sent to the family. The re-proposed activity relies on a more accurate measure of self-sufficiency by basing the expedited graduation criteria on income rather than housing assistance level, which could penalize families who rent cheaper units. This activity is intended to increase the number of vouchers available to new families and to provide a financial cushion for graduating families.

This activity was on hold while SCCCHA was in the process of changing the structure of its waiting list to a permanently-open interest list, which was launched in FY2021. HUD approved the re-proposed activity in FY2022.

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD in FY2022.

### 2022-1: HOMEOWNERSHIP AND ASSET LIMIT FOR ELIGIBILITY

PLAN YEAR APPROVED: FY2022

This activity makes the following applicants ineligible for SCCCHA's Section 8 program:

- Those with \$100,000 or more in assets per family member; and
- Those with a present ownership interest in a suitable home in which they have a legal right to reside in Alameda, Contra Costa, Marin, Merced, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, San Benito, Solano, and Stanislaus Counties.

Units excepted from this rule are those that are part of SCCCHA's homeownership program, units not suitable for occupancy (i.e. vacant land or condemned properties), units jointly owned with a non-household member, and those owned by VAWA participants.

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

A planned non-significant modification to this activity is a change to the definition of "asset" as noted above. The principal and interest in a 401(k) plan, 403(b) plan, IRA, 457 plan, 529 college savings plan, or Coverdell ESA, will not be considered an asset when determining if the family is eligible for a voucher. These funds will be included when calculating asset income for the family.



**2022-2: WAIVE FULL-TIME STUDENT INCOME EXCLUSION FOR FAMILIES WHICH EARN 80% OF AREA MEDIAN INCOME**

PLAN YEAR APPROVED: FY2022

This activity allows SCCHA to count income which would be excluded under 24 CFR 5.609(c)(11) towards a family's annual income calculation. 24 CFR 5.609(c)(11) requires SCCHA, when calculating annual income for a family with a full-time student 18 years or older, to exclude all the income of that full-time student in excess of \$480. Under this activity, SCCHA will exclude full-time student income in excess of \$480 only when the family's total annual income (before exclusion of any full-time student income) falls below 80 percent of the Santa Clara County area median income (AMI) applicable for that family's size.

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

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

**2022-4: MODIFIED PBV CONTRACT RENTS**

PLAN YEAR APPROVED: FY2022

This activity waives 24 CFR 983.301(b) and 24 CFR 983.302 for PBV HAP contract renewals. For PBV HAP contract renewals, SCCHA is allowed to set PBV contract rents at a lower amount in cases where project underwriting analysis shows that there will be material excess cash flow. For larger projects with excess cash flow, contract rents would be limited to as low as 80% of FMR (for projects with 40 to 59 units) and as low as 70% of FMR (for projects with 60 or more units).

The following types of projects would not be subject to the lower contract rent limit:

- Projects with 39 or fewer units;
- Projects in which PBVs comprise 25% or less of the total units;
- Projects with a Debt Service Coverage Ratio (DSCR) of 1.3 or below for the first year of contract renewal;
- Projects with a DSCR in any year of the HAP renewal contract term below 1.0; or
- LIHTC financed projects that can't meet the True Debt Test (that the debt incurred for a Low Income Housing Tax Credit project is a "true debt" for tax purposes).

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

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

**2024-1: DIGITAL INCLUSION**

PLAN YEAR APPROVED: FY2024

To address the well-documented gap or "digital divide" separating low-income households from access to technology and broadband internet, the Housing Authority implemented a pilot

program with a local partner to provide devices and training to community members who are at 80% AMI or below. The pilot includes 500 tablets to be distributed to community members at digital literacy workshops.

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

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

## 2024-2: RENTAL ASSISTANCE FOR STUDENT PARENTS OBTAINING POST-SECONDARY EDUCATION

PLAN YEAR APPROVED: FY2024

This local non-traditional activity secures funds for a service organization to provide housing, academic and career coaching, and childcare to low-income families while they complete their post-secondary education program. The dual-generation education support model will empower low-income families to complete their educational goals while their children receive care that supports their cognitive, social, and emotional development, thus leading families to financial stability and self-reliance.

Applicants referred from the service provider must meet HCV eligibility requirements, be a parent to at least one minor child, and can provide verification of school enrollment. SCCHA and its partners will collaborate to develop program components based on best practices. The participant will receive preference for the HCV program upon completion of their educational program.

This activity will be implemented once a service organization has been identified.

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

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

## 2024-3: SHORT TERM BRIDGE LOAN

PLAN YEAR APPROVED: FY2024

This activity is another in the Housing Authority's arsenal of tools to increase the housing supply within the County. The short-term loan will provide flexible financing for development of affordable multi-family rental and supportive housing done by nonprofit organizations or limited partnerships and single asset entities with nonprofit sponsors. Funds can be used for predevelopment, acquisition, construction and rehabilitation bridge financing. Projects will include recordation of an affordability restriction on the property. Loans up to \$1 million will require a three-year period of affordability; loans more than \$1 million but less than \$5 million will require a five-year period of affordability; and loans more than \$5 million but less than \$10 million will require a ten-year period of affordability.

Full repayment of the principal of the short-term loans is intended to be made prior to occupancy of the completed project but may be extended to no later than the end of the period of affordability at the sole discretion of the Housing Authority. Interest accrued on all

loans will be deferred and due no later than the end of the period of affordability. The land use restriction will terminate upon payment of both principal and interest. Once repaid, funds will be used for an MTW eligible purpose.

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

There have not been any non-significant changes or modifications to the MTW activity since it was approved by HUD.

## Activities On Hold

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

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

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

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

## Closed Out Activities

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

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<b>2010-1</b> Eliminating 100% Excluded Income from the Income Calculation Process	With the publication of PIH Notice 2013-4, issued January 28, 2013, the verification and calculation of 100% excluded income is no longer required. Therefore, SCCHA eliminated this activity in FY2013. This activity saved labor time and costs.	This activity was closed out in <b>FY2013</b>
<b>2012-1</b> Create Standard Utility Allowance Schedule	SCCHA utilizes MTW Activity 2014-4, which simplifies the rent calculation method and eliminates utility allowances. Because of Activity 2014-4, MTW Activity 2012-1 is no longer necessary and was closed out prior to implementation.	This activity was closed out in <b>FY2013</b>
<b>2012-5</b> Expand Tenant Services at SCCHA Owned or Affiliate Properties	Tenant services can be expanded with single fund flexibility and this activity is no longer needed.	This activity was closed out in <b>FY2023</b>
<b>2014-1a &amp; 2014-1b</b> Focus Forward Program (and amendments)	After reviewing the outcomes of time-limited voucher programs, SCCHA determined this pilot program did not meet the needs of the local community and close it out prior to implementation.	This activity was closed out in <b>FY2022</b>
<b>2014-2</b> Eliminate Requirement to Re-Determine Rent Reasonableness when HUD decreased Fair Market Rent	This activity was closed out prior to being implemented because HUD regulations made this activity moot.	This activity was closed out in <b>FY2022</b>
<b>2014-3</b> Freeze on Contract Rent Increases	This activity no longer serves the needs of our local community.	This activity was closed out in <b>FY2023</b>
<b>2015-1</b> Using UPCS or Local Inspection Standards to Determine Housing Quality Standards	On June 25, 2014, HUD published in the Federal Register that, effective July 1, 2014, "A PHA may comply with the biennial inspection requirement through reliance upon an inspection conducted for another housing assistance program. If a PHA relies on an alternative inspection to fulfill the biennial inspection requirement for a particular unit, then the PHA must identify the alternative standard in its administrative plan." Therefore, this activity was closed without implementation because HUD's directive superseded this activity.	This activity was closed out in <b>FY2015</b>
<b>2016-1</b> Restriction on Head of Household Changes	This activity was intended to be implemented when the Focus Forward Program (Activity 2014-1a/1b) was implemented. Activity 2014 1a/1b was not implemented and was closed in FY2022.	This activity was closed out in <b>FY2022</b>

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<b>2018-1</b> Strengthening Partnerships through Capacity Building	This activity was intended to be implemented when the Focus Forward Program (Activity 2014-1a/1b) was implemented. Activity 2014 1a/1b was not implemented and was closed in FY2022.	This activity was closed out in <b>FY2022</b>
<b>2020-5</b> Eliminate the 40% of Income Cap at Initial Leasing	Implemented during the COVID-19 pandemic to provide more housing options in a volatile rental market. Closed out at the request of a community partner as the threshold of 40% was too burdensome for families.	This activity was closed out in <b>FY2021</b>
<b>2020-6</b> Reduced Frequency of Periodic Inspections (Not Implemented/On-Hold)	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 who are 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.	This activity was closed out in <b>FY2021</b>

## V. Planned Application of MTW Funds

The information reported in Section V. serves as a placeholder until the FY2025 budget is approved by the SCCHA Board of Commissioners. At the time the FY2025 budget is approved (June 2024) SCCHA will update Section V. and re-submit the Plan to HUD.

### A. PLANNED APPLICATION OF MTW FUNDS

#### i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	\$23,580
70600	HUD PHA Operating Grants	\$475,001,844
70610	Capital Grants	\$617,466
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$432,797
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$243,528
70000	Total Revenue	\$476,319,215

#### Note 1: Source in Analysis

##### 70600-HUD PHA Operating Grants \$475,001,844:

This FDS line represents the sum of the following: (1) Public Housing Operating Subsidy Income \$19,636 and (2) Section 8 MTW Admin Fee & HAP Earned \$474,982,208.

##### 71200+71300+71310+71400+71500 - Other Income \$243,528

This FDS line represents the sum of the following: (1) Land lease \$50,000, (2) Interest income-Ground lease \$2,376 (3) Fraud recovery \$190,552 and (4) Other miscellaneous income \$500.

ii. Estimated Application of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$24,021,854
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$0
92500 (92100+92200+92300+92400)	Total Tenant Services	\$223,542
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$18,065
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$54,046
95000 (95100+95200+95300+95500)	Total Protective Services	\$26,870
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$351,053
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$70,677
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	\$38,900
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$416,773,542
97400	Depreciation Expense	\$326,186
97500+97600+97700+97800	All Other Expense	\$0
90000	Total Expenses	\$441,904,734



**Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:**

We will use the Fiscal Year 2024, net reserve balance of \$34,414,481 to fund the following:

**I-Activity 2012-3-Acquisition & Development Funds - \$26.76M:**

SCCHA anticipates using (1) \$3.2M to subsidize the development of the East Santa Clara Street Projects and the Sage Family Apartments; (2) \$6.6M for the Pavilion Inn rehabilitation, (3) \$16.34M for the Surestay projects and adjacent parcels EZ-8 to redevelop replacement housing.

**II-Activity 2012-3-Acquisition & Development Funds - \$617K:**

SCCHA anticipates using \$617K from the Public Housing Capital Grant as an additional source to fund the construction and development costs of the Bellarmino Place Apartments.

**III- Activity 2012-4-Preservation Funds - \$6.4M:**

SCCHA anticipates using (1) \$4.5M to rehabilitate and redevelop the Buena Vista Mobile Home Park, (2) \$1.9M to preserve and rehabilitate three HUD acquisition properties: Girasol Apartments, Jardines Paloma Blanca Apartments, and Las Golondrinas Apartments.

**IV- Activity 2020-2-Interim Housing - \$2.8M:**

SCCHA is partnering with the City of San Jose and the County of Santa Clara to provide interim (short-term) housing to special needs populations.

**Note 2 - Source Out Analysis**

**91000 - Total Operating - Administrative \$24,021,854:**

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

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

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

**92500-Total Tenant Services- \$223,542:**

This FDS line is consisted of \$3K resident programs and \$220K for other admin contract-tenant services.

**96100-Total Insurance Premiums - \$351,053:**

This FDS line is consisted of \$68K liability insurance, \$179K worker's compensation insurance and \$104K for other insurance.

**96000 - Total Other General Expenses - \$70,677:**

This FDS line is comprised of (1) \$69K admin fee port out, and (2) \$1K payment In Lieu of Taxes.

**97300+97350 - Housing Assistance Payments + HAP Portability-In \$416,773,542:**

This FDS line represents the total HAP paid out \$417M.

HAP Portability -It is not budgeted in FY2020 as HACSC is absorbing all future incoming portability.

### iii. Description of Planned Application of MTW Single Fund Flexibility

#### PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

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

In FY2024, SCCCHA plans to continue to use MTW Single Fund Flexibility to pay for housing search services for participants who are experiencing challenges in finding a rental unit. The Agency also plans to continue several Information Technology Department projects, such as migrating our Section 8 software system.

SCCCHA plans to use MTW Single Fund Flexibility to supplement RAD rents, beginning in FY2024.

### iv. Planned Application of PHA Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY - Unspent Balances	Planned Application of PHA Unspent Funds during FY
HCV HAP*	\$158,803,994	\$158,803,994
HCV Admin Fee		
PH Operating Subsidy		
<b>TOTAL:</b>	<b>\$158,803,994</b>	<b>\$158,803,994</b>

#### Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

One-Time Board Approved Project	MTW Activity No.
Bellarmino Place LP - Predevelopment Loan	2012-3
East Santa Clara - Predevelopment Activity	2012-3
Bayberry Apartments LP - Predevelopment Loan	2012-3
Primrose Apartments LP - Predevelopment Loan	2012-3
Sage Apartments LP - Predevelopment Loan	2012-3
Poco Way HDC (Buena Vista Mobile Home Park) - Predevelopment Loan	2012-4
San Pedro Gardens - Rehabilitation Project	2012-4
HomeKey Project (Residence Inn)	2012-3
Pavilion Inn - HomeKey Project	2012-3
HUD Properties Acquisition: Girasol Acquisition LP, Jardines Paloma Blanca Acquisition LP, and Las Golondrinas Acquisition LP	2012-4
Denny's Acquisition - Surestay Project (resident building)	2012-3
EZ-8 Acquisition - Surestay Project (redevelopment of housing for Surestay)	2012-3
Surestay Projects - Predevelopment Due Diligence Activity	2012-3
Short-Term Pilot Loan Program	2012-3
California Employers' Pension Prefunding Trust (CEPPT) Contributions	
Pedro Street Interim Housing Rental Subsidy Payment	2020-2
HAP Shortfall Contingency	

## B. LOCAL ASSET MANAGEMENT PLAN

- i. Is the MTW PHA allocating costs within statute?
- ii. Is the MTW PHA implementing a local asset management plan (LAMP)?
- iii. Has the MTW PHA provide a LAMP in the appendix?
- iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

## C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

### i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
N/A

- ii. Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

iii. If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

## VI. Administrative

### A. BOARD RESOLUTION ADOPTING THE FY2025 ANNUAL MTW PLAN AND CERTIFICATIONS OF COMPLIANCE

The SCCHA Board Resolution adopting the FY2025 MTW Annual Plan and the Certifications of Compliance from the County of Santa Clara and the City of San José are attached as **Appendix One** to this Plan.

### B. CERTIFICATION OF PAYMENTS

SCCHA has attached signed copies of the Certification of Payments (HUD-50071) as **Appendix Two** to this Plan.

### C. DISCLOSURE OF LOBBYING ACTIVITIES

SCCHA has attached signed copies of the Disclosure of Lobbying Activities (SF-LLL) as **Appendix Three** to this Plan.

### D. DOCUMENTATION OF THE PUBLIC PROCESS FOR THE FY2025 ANNUAL MTW PLAN

SCCHA’s FY2025 MTW Annual Plan was made available for public review from Feb 20, 2024 through March 20, 2024. The public hearing for the plan was held on March 8, 2024. There was one member of the public and the comment is listed below.

### E. PLANNED AND ONGOING EVALUATIONS OF SCCHA’S MTW DEMONSTRATION

In FY2025, SCCHA will continue to refine its approach to data gathering and monitoring of MTW activities and their impacts on stated goals and objectives. SCCHA is planning a full-scale study and evaluation of its MTW activities.

#### Public Comments

Individual or Organization	Comment	SCCHA Response
Project Sentinel	Is it (the activity) available to existing section 8 voucher holders or will it expand to new voucher holders?	The activity will only apply to current voucher holders. There aren’t any HUD-provided funds that will assist new voucher holders that would be impacted by the SAFMR mandate

## Appendix One: Resolution No. 24-17

### RESOLUTION NO. 24-17

#### RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SANTA CLARA COUNTY HOUSING AUTHORITY APPROVING SUBMISSION OF THE FY2025 MOVING TO WORK (MTW) ANNUAL PLAN TO U.S. DEPARTMENT OF HUD

**WHEREAS**, the Santa Clara County Housing Authority, together with the Housing Authority of the City San José (collectively referred to as "**SCCHA**"), each entered into a ten-year Moving to Work (**MTW**) Agreement with the U.S. Department of Housing and Urban Development (**HUD**) in 2008 and a subsequent extension through 2038; and

**WHEREAS**, currently in its sixteenth year in the MTW Program, SCCHA has drafted its FY2025 Moving to Work Annual Plan, solicited public comment and conducted a public hearing on the Plan; and

**WHEREAS**, the Board has reviewed the proposed FY2025 MTW Annual Plan, comments received and required certification;

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

1. Certifies the statements in the attached Certifications of Compliance with Regulations; and
2. Approves the proposed FY2025 Moving to Work Annual Plan for SCCHA and the Housing Authority of the City of San Jose; and
3. Authorizes SCCHA to submit the proposed FY2025 Moving to Work Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both agencies.


**PASSED AND ADOPTED** by the Board of Commissioners of the Santa Clara County Housing Authority, State of California, on March 28, 2024, held at 505 W. Julian Street, City of San Jose, State of California, upon motion from Commissioner William Anderson and seconded by Commissioner Vice Chair Denis O'Neal with the following vote:


**AYES:** Commissioner Jennifer Loving, Vice Chair Denis O'Neal, Commissioner William Anderson, Commissioner Marilyn Russell, Commissioner Ericka Mendieta

**NAYS:** None

**ABSTAIN:** None

**ABSENT:** Commissioner Adrienne Lawton

By:  \_\_\_\_\_  
Jennifer Loving, Chair

ATTEST:  \_\_\_\_\_  
Claudia Bautista, Clerk of the Board

APPROVED AS TO FORM:  \_\_\_\_\_  
Adrian R. Guerra, General Counsel

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

The undersigned, Claudia Bautista, Clerk of the Applicant, does hereby attest and certify that the foregoing Resolution, being Resolution No. 24-17 has not been altered, amended, or repealed and was duly passed, approved and adopted by the Board of Commissioners of the Santa Clara County Housing Authority at a meeting held on the 28<sup>th</sup> day of March 2024, and that the same was passed by the following vote:

Chair Jennifer Loving, Vice Chair Denis O'Neal, Commissioner William Anderson,  
AYES: Commissioner Marilyn Russell, Commissioner Ericka Mendieta

NOES: None

ABSTAIN: None

ABSENT: Commissioner Adrienne Lawton

Executed on this 28<sup>th</sup> day of March, 2024.

 \_\_\_\_\_  
Claudia Bautista  
Clerk of the Board



## MTW CERTIFICATIONS OF COMPLIANCE

### U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING

#### Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2024), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.



MTW Supplement to the Annual PHA Plan

OMB No. 2577-0226  
Expires: 03/31/2024

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Santa Clara County Housing Authority

CA059

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

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

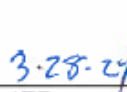
Jennifer Loving

Chair, Board of Commissioners

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**





**SIGNATURE**

**DATE**

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

**MTW CERTIFICATIONS OF COMPLIANCE**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning ( 07/01/2024 ), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

MTW Supplement to the Annual PHA Plan

OMB No. 2577-0226  
Expires: 03/31/2024

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the City of San Jose

CA056

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

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

Jennifer Loving

Chair, Board of Commissioners

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**

**SIGNATURE**

**DATE**

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

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**County of Santa Clara**  
**Office of Supportive Housing**150 W. Tasman Street, San Jose, CA 95134  
(408) 278-6400 Main  
(669) 220-1444 Fax

March 29, 2024

Preston Prince, Executive Director  
Santa Clara County Housing Authority  
505 W. Julian Street  
San Jose, CA, 95110**RE: FY2025 Moving to Work Plan Certification of Compliance**

Dear Mr. Prince:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2025 Moving to Work (MTW) Plan as drafted is consistent with the direction of the Urban County of Santa Clara 2020-2025 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

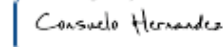
The Housing Authority's FY2025 MTW Plan activities and objectives are consistent with the five-year goals of the Urban County of Santa Clara 2020-2025 Consolidated Plan in the efforts to:

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

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

Sincerely,

DocuSigned by:



Consuelo Hernandez, AICP

Director, County of Santa Clara Office of Supportive Housing

Board of Supervisors: Sylvia Arenas, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian  
County Executive: James R. Williams



*City of San José Housing Authority*

March 26, 2024

Santa Clara County Housing Authority  
505 West Julian Street  
San José, CA 95110  
Attn: Mr. Preston Prince, Executive Director

**RE: Fiscal Year 2025 Moving to Work Plan Certificate of Compliance**

Dear Mr. Prince:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2025 Moving to Work Annual Plan (MTW Plan) is, as drafted, consistent with the direction of the City of San José's 2020-2025 Consolidated Plan (Consolidated Plan) for the use of federal funds from the U.S. Department of Housing and Urban Development. The City of San José (City) Council approved the City's Consolidated Plan in August 2020.

The MTW Plan's activities and objectives are consistent with the five-year priorities of the City's current Consolidated Plan in its efforts to:

1. **Prevent and Address Homelessness**—Increase housing opportunities and self-sufficiency for homeless populations and assist in the prevention of homelessness for at-risk individuals and families.
2. **Create and Preserve Affordable Housing**—Create new affordable housing and preserve existing affordable housing.
3. **Promote Fair Housing**—Promote fair housing and lower barriers to housing.
4. **Strengthen and Stabilize Communities**—Strengthen and stabilize communities' condition and help to improve residents' ability to increase their employment prospects and grow their assets.

Thank you for your partnership in helping our local residents to achieve housing stability and improve their lives.

Rosalynn Hughey  
Executive Director



## Appendix Two: Certifications of Payments (HUD 50071)

OMB Approval No. 2577-0157 (Exp. 1/31/2027)

### Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Office, Office of Policy Development and Research, REE, Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

CA059 Santa Clara County Housing Authority

Program/Activity Receiving Federal Grant Funding

Section 8 Housing Choice Voucher Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

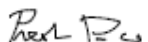
Name of Authorized Official

Preston Prince

Title

Executive Director

Signature

  
Preston Prince (Apr 10, 2024 12:55 EDT)

Date (mm/dd/yyyy)

04/10/2024

Previous edition is obsolete

form HUD 50071 (01/14)

**Certification of Payments  
to Influence Federal Transactions**U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

Public reporting burden for this information collection is estimated to average 30 minutes, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to the Reports Management Office, Office of Policy Development and Research, R.E.E., Department of Housing and Urban Development, 451 7th St SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0157.

Applicant Name

CA056 Housing Authority of the City of San Jose

Program/Activity Receiving Federal Grant Funding

Section 8 Housing Choice Voucher Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

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This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Name of Authorized Official

Preston Prince

Title

Executive Director

Signature

  
Preston Prince (Apr 10, 2024 12:55 EDT)

Date (mm/dd/yyyy)

04/10/2024

Previous edition is obsolete

form HUD 50071 (01/14)

## Appendix Three: Disclosure of Lobbying Activities (SF-LLL)

DISCLOSURE OF LOBBYING ACTIVITIES		Approved by OMB 0348-0048
Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 (See reverse for public burden disclosure.)		
1. Type of Federal Action: <input checked="" type="checkbox"/> NA a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. Status of Federal Action: <input checked="" type="checkbox"/> NA a. bid/offer/application b. initial award c. post-award	3. Report Type: <input checked="" type="checkbox"/> NA a. initial filing b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Housing Authority of the City of San Jose 505 W. Julian St San Jose, CA 95110  Congressional District, if known: 4c		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A  Congressional District, if known:
6. Federal Department/Agency: U.S Department of Housing and Urban Development	7. Federal Program Name/Description: N/A CFDA Number, if applicable: _____	
8. Federal Action Number, if known: N/A	9. Award Amount, if known: \$ N/A	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Fennel Consulting LLC 101 Constitution Ave, N.W. Suite 800 Washington, D.C. 20001	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Fennel, Melody Preston, Michael	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.		
Signature: <u>Preston Prince</u> Print Name: <u>Preston Prince</u> Title: <u>Executive Director</u> Telephone No.: <u>(408) 993-2903</u> Date: <u>04/10/2024</u>		
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)




### DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB  
0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input checked="" type="checkbox"/> NA a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance		<b>2. Status of Federal Action:</b> <input checked="" type="checkbox"/> NA a. bid/offer/application b. initial award c. post-award		<b>3. Report Type:</b> <input checked="" type="checkbox"/> NA a. initial filing b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Santa Clara County Housing Authority 505 W. Julian St San Jose, CA 95110  Congressional District, if known: 4c			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b> N/A  Congressional District, if known:		
<b>6. Federal Department/Agency:</b> U.S Department of Housing and Urban Development			<b>7. Federal Program Name/Description:</b> N/A  CFDA Number, if applicable: _____		
<b>8. Federal Action Number, if known:</b> N/A			<b>9. Award Amount, if known:</b> \$ N/A		
<b>10. a. Name and Address of Lobbying Registrant</b> <i>(if individual, last name, first name, MI):</i> Fennel Consulting LLC 101 Constitution Ave, N.W. Suite 800 Washington, D.C. 20001			<b>b. Individuals Performing Services</b> <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i> Fennel, Melody Preston, Michael		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u></u> Print Name: <u>Preston Prince</u> Title: <u>Executive Director</u> Telephone No.: <u>(408) 993-2903</u> Date: <u>04/10/2024</u>		
<b>Federal Use Only:</b>				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	