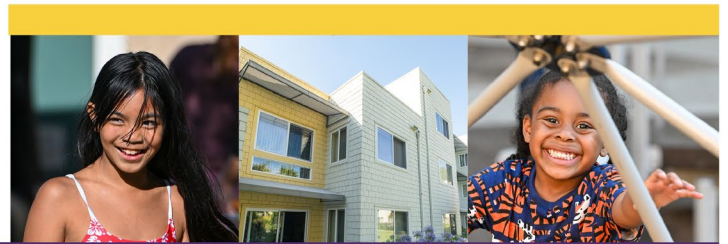


FY2026 Moving to Work Annual Plan

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

Submitted on April 16, 2025



FY2026 Moving to Work Annual Plan

SANTA CLARA COUNTY HOUSING AUTHORITY (SCCHA)

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

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

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

The Santa Clara County Housing Authority (SCCHA) is the county's largest provider of affordable housing assistance, working to produce, preserve and protect housing availability and affordability to 22,000 households throughout Santa Clara County. SCCHA is elevating efforts to address the affordable housing shortage, working collaboratively with partners to holistically support the needs of low-income communities. SCCHA goes beyond traditional housing provision to become an innovative change maker that embraces residents' lived experiences, working to build a future through community transformation in Santa Clara County. In FY2026, the Housing Authority plans to prioritize housing production and enhanced customer service, ensuring sustainable support to residents.

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. In the face of these statistics the Housing Authority will work diligently with its partners to ensure housing stability for its residents and the community.

Since January 2020, Santa Clara County's supportive housing system has connected more than 6,000 people with permanent housing. The County's \$950 Million Housing Bond has produced more than 5,000 new units, many of them permanent supportive housing. The Housing Authority is an invaluable partner in this effort with Project-Based Vouchers supporting 2,500 units. The Housing Authority's annual investment is over \$40,000,000 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 actively expanding and enhancing the range of services available to the community, with a focus on improving accessibility and meeting community needs. The newly formed Resident Services Team is making a direct impact on the lives of our residents. Recently, the team successfully partnered with a local non-profit to acquire bikes for children living at a Housing Authority property, helping to promote physical activity, independence, and community engagement. This is one of many of the team's ongoing efforts to foster a stronger sense of community and well-being among residents, while addressing immediate needs in innovative ways. Other key initiatives include the soon to be implemented Mobility Program aimed at offering residents more flexible housing options and the Direct Rental Assistance Pilot, as proposed in this Plan.



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 in planning and a purpose-driven approach to activity development.

Vision and Goals

The Housing Authority is currently in the process of creating a Strategic Plan update to ensure the Plan is relevant to the future of the Agency and our role in the local community. Our goals remain the same and are streamlined into more accessible statements of innovation and relevance that are centered around residents. 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 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 FY2026 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 works closely with local landlords, developers, and community organizations to build a collaborative network that strengthens housing opportunities and creates lasting positive change for our residents.

Relevance & Innovation

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

The Housing Authority will explore the use of Tenant Based Vouchers in alternative housing units that meet HQS requirements, such as tiny homes or modular housing located in Santa Clara County and consider the expansion of the partnership with the City of San Jose to apply flexible funding to support operations for at least one additional interim housing site.

Portfolio Growth

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

Approximately 3,000 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. The Housing Authority's real estate efforts are focused on asset management and development, both of which strengthen and enrich our community.

PBV Pipeline

SCCHA's PBV pipeline is detailed in Section II of this Plan. Several of the projects completing construction in FY2026 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 FY2026. 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 FY2026 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.

New Proposed Activities for FY2026

In FY2026 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 two new activities and two re-proposals in this year's Plan:

- 2026-1: Shallow Subsidy Program
- 2026-2: Direct Rental Assistance Pilot
- 2012-4: Affordable Housing Preservation Fund for SCCHA- and Affiliate-Owned Properties (Re-proposal)
- 2017-2: Special Needs Direct Referral Program (Re-proposal)

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
2025-1	Small Area Fair Market Rents			

* 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+			Fully Accessible	Adaptable
None	0	0	0	0	0	None		0	0
None	0	0	0	0	0	None		0	0
None	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
525 N. Capitol	65	No	New construction project consisting of 191 total units. 40 PBVs will be for families and chronically homeless families. 25 units will be supported by HUD-VASH PBVs.
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.
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.
East Santa Clara Senior	20	No	New construction project consisting of 63 total units. 20 MTW PBVs are set aside for chronically homeless seniors.
EAH Blossom Hill	6	No	New construction project consisting of 84 total units. 6 family units will be supported with PBVs.
Kooser	30	No	New construction project consisting of 191 units. 30 units will have PBVs for chronically homeless families
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.
Santa Teresa Multifamily	21	No	New construction project consisting of 49 total units. 21 MTW PBVs are for large families.
Rincon de los Esteros	120	No	Existing project acquired by the Housing Authority. MTW PBVs will support 120 family units

427

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 or HAP is already in place at the beginning of the Plan Year. Select one of the following to indicate the *Planned status by the end of the Plan Year: 'Committed,' 'leased,' or 'issued.'" In column three, 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.
961 Meridian	38	Committed	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.
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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) 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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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.
Hawthorn	48	Committed	No	New construction project consisting of 103 total units. 26 family units and 22 chronically homeless units will be supported with PBVs.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
Iamesi 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
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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 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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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-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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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). 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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.
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.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
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.

3,685

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 is exploring Faircloth to RAD conversions and may begin the process in FY2026. The properties under analysis are: Avenida Espana Gardens (84 senior units), Bracher Gardens Apartments (72 senior units), DeRose Gardens (76 senior units), El Parador Apartments (125 senior units), John Burns Gardens (100 senior units), Morrone Gardens Apartments (102 senior units), Villa Hermosa (100 senior units).

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 will finish at the beginning of the fiscal year at Alvarado Park Senior Housing (89 units)

The first phase of the East Santa Clara Master Plan (ESC), Hawthorn Senior (92 units), is under construction and will be completed in FY26. The second phase, Trillium (65 units), will serve seniors with a portion of units reserved for people with special needs, and is projected to apply for tax credits and start construction in FY26. Subsequent (ESC) phases including Sage and Elderberry will use MTW funds for planning and pre-development work.

The Development team is targeting two additional new construction tax credit applications: Orchard Gardens (123 units), an existing family community that will be rehabilitated and expanded, and The Villages (74 units), a senior development with a special needs component. The team is also aiming to close financing and begin construction for the rehabilitation of The Willows, a 47-unit family development.

Other projects will use MTW for predevelopment and due diligence activities, including Buena Vista (44 units), Autumn and Montgomery, and the North First Street Master Plan, which are still in early stages of conceptual planning.

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**
Public Housing Units Leased	48	4
Housing Choice Vouchers (HCV) Utilized***	243,216	20,268
Local, Non-Traditional: Tenant-Based^	1,464	122
Local, Non-Traditional: Property-Based^	12,780	1,065
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	257,508	21,459

* "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.

*** "Housing Choice Vouchers (HCV) Utilized" includes all SPVs within the MTW PHA's portfolio

^ 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.

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	1,464	122
Property-Based	Create Affordable Housing Preservation Fund for SCCCHA and Affiliate-Owned Properties/Activity 2012-4	12,780	1,065

Homeownership	N/A	0	0
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* The sum of the figures provided should match the totals provided for each local, non-traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category, if applicable.

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 implemented Small Area FMRs in January 2025 and will monitor effects in the coming year. 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 FY2026.
Local, Non-Traditional	None

iii. Unique Households Served (Optional)

Number of unique households served annually through local, non-traditional rental services program such as short-term rental assistance, rapid rehousing, emergency housing, etc.

UNIQUE HOUSEHOLDS SERVED
The Interim Housing Activity, 2020-2 serves the community by providing housing to project-based voucher holders who are waiting for units to finish construction. Most of these voucher holders are chronically homeless and getting them into units helps establish case management relationships early in the process. The numbers above reflect the 122 units that are being used as interim housing under this activity. The number of households actually served is much greater than the 122 reflected above. Unit turnover is more frequent than annual, but difficult to predict, and results in the number of families served being as high as 1,464, if all units turned over monthly.

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 (indicating whether the waiting list is site-based or agency-wide for public housing) 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
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Federal MTW Public Housing Units	Site Based	685	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific*	43,007*	Open	Yes
Project-Based, Local, Non-Traditional MTW Housing Assistance Program	Site Based	2,400	Partially Open	Yes

* SCCHA'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 13 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. Site based lists exist at: El Parador, Bendorf Drive, Blossom River, Clarendon, DeRose Garden, Ford Road Plaza, Helzer Courts, Morrone Gardens, Pinmore Gardens, San Pedro Gardens, Rincon de los Esteros, and Bellarmino.

iii. 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 FY2026.

2026-1: SHALLOW SUBSIDY FOR RENT-BURDENED FAMILIES

(Proposed Activity)

Activity Description

The Santa Clara County Housing Authority (SCCHA) proposes this new local non-traditional activity to implement a flexible shallow subsidy program for rent-burdened families. This pilot program aims to address the critical housing needs of vulnerable individuals and families in Santa Clara County's affordable housing units. The program will subsidize rents at levels below fair market rents. This level of subsidy is considered "shallow" compared to the "deep" subsidies associated with Housing Choice Voucher programs that typically allow for rents closer to fair market rents. This activity addresses the economic challenges faced by residents in the high-cost Santa Clara County housing market by allowing SCCHA to support more residents with the same amount of resources compared to a traditional Housing Choice Voucher program, thereby increasing the reach and impact of available funding.

The program will target properties primarily serving individuals and families who are rent-burdened. As a local, non-traditional activity, the program will follow the parameters of PIH Notice 2011-45, including the resident income and unit inspection requirements. This shallow subsidy will ensure the support of safe housing for a broad spectrum of low-income seniors, including those in the extremely low-income and very low-income categories.

Under this pilot program, SCCHA will commit up to \$5 million annually. Shallow subsidy contracts will start with a five-year term, with possible extensions in 5-year increments, pending funding availability and subject to Board approval. Shallow subsidies will be structured to reduce rent burdens for eligible households, below 40% of annual income, with annual adjustments of up to 3% to account for the county's high cost of living. Importantly, the subsidy contracts will have a five-year term but will end upon the turnover of the current resident in the property, ensuring that the assistance is targeted to those most in need.

The pilot program will be available to properties with 50 units or fewer that are older than 15 years, with a regulatory agreement in place. The funds will be awarded through a Notice of Funding Availability process. Direct subsidy payments will be made to property owners on behalf of eligible residents, and optional case management and support services may be offered to ensure housing stability. This approach not only addresses immediate housing needs but also contributes to the overall well-being of low-income residents and helps maintain the viability of smaller, older properties in the county's housing stock.

Throughout the five-year pilot period, the program will be subject to regular evaluation and potential adjustments. Special attention will be paid to ensuring demographic representation,

reflecting the nature of Santa Clara County's population. Evaluation metrics will include but not limited to:

- Reduction in the percentage of rent-burdened households.
- Improved housing stability among residents.
- Cost-effectiveness compared to traditional subsidy models.
- Number of properties and households served, with attention to demographic representation.
- Long-term impacts on affordable housing stability over the 5-year period.

This MTW activity represents a significant commitment to addressing the housing challenges faced by low-income families in Santa Clara County. By providing targeted assistance through shallow subsidies, the program aims to increase housing choice, enhance efficiency in service delivery, and address the specific needs of a vulnerable population. As the pilot progresses, its impact on long-term housing stability will be closely monitored, with comprehensive evaluations at the midpoint and end of the program to determine its long-term viability and potential for expansion or modification.

Relation to Statutory Objectives

This activity supports the statutory objective of supporting family self-sufficiency.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in this fiscal year.

Special Purpose Vouchers

This activity does not use vouchers, therefore SCCHA is not requesting any Special Purpose Vouchers be included.

Cost Implications

SCCHA anticipates this activity will increase spending by up to \$5 million annually.

Authorization for the Activity

The proposed activity is authorized as a local, non-traditional activity in the First Amendment to SCCHA's MTW Agreement with HUD, which amends Attachment D, "Use of MTW Funds," executed on April 30, 2010. Local non-traditional activities are allowed and outlined in PIH Notice 2011-45. This authorization is needed to allow SCCHA to use HCV funding for shallow subsidies.

Evaluation

SCCHA will closely monitor the impacts on residents and rent burdens, as described above.

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

This activity does not qualify as a Rent Reform Initiative.

2026-2: DIRECT RENTAL ASSISTANCE*(Proposed Activity)***Activity Description**

In September 2023 HUD's Office of Policy Development and Research published a notice stating an interest in creating Direct Rental Assistance Pilot Program where rental assistance would be given directly to tenants, instead of to landlords as is the current practice. This notice garnered much interest locally as there are several Basic Income pilots operating in Santa Clara County and this presented an opportunity to test a different type of program, one that could transform the Housing Choice Voucher program on a national scale.

With 40 percent of voucher holders failing to successfully use their vouchers, this pilot will test the current program against an alternative model. In this new approach, typical lease-up barriers are eliminated, and tenants receive assistance directly, removing the traditional relationship between the Housing Authority and local landlords.

SCCHA is working closely with MDRC, a nonprofit, nonpartisan research organization, and several other housing authorities to develop a framework for implementing a DRA pilot. SCCHA's initial pilot will involve up to 100 DRA participants and 100 traditional voucher participants, all drawn from our Wait List as part of a randomized controlled study. Outcomes will be analyzed and evaluated by MDRC. At the end of the pilot, likely up to 5 years, families who are in receipt of the Direct Rental Assistance will be offered a housing choice voucher, if still eligible.

This activity seeks the necessary waivers, through the Local, Non-Traditional parameters, necessary to move forward with program design and implementation. Specifically, SCCHA requests waivers for the following:

Subsidy Payments – Foundational to the DRA program is the payment of the subsidy to the tenant. The DRA subsidy will be calculated as the applicable payment standard minus 30% of the household's gross income, up to the gross rent. The Total Tenant Payment (TTP) will be based on gross income, as modified by activity 2014-4. The TTP will make up the difference between the subsidy and the gross rent. The subsidy will remain fixed at any level of gross rent but will not exceed the gross rent. If the gross rent is less than the payment standard, the household's TTP will be less than 30% of its gross income. Payment standards will be based on Small Area Fair Market Rents.

Inspections – SCCHA plans to modify HQS requirements to align with less landlord interaction. SCCHA would like to allow tenants to conduct the initial inspection to certify the unit is safe, decent, sanitary and in good repair, after thorough education to the tenant on what this means. SCCHA would follow up with an HQS inspection within 60 days of move in.

Eligibility – SCCHA will not require a Request for Tenancy Approval as there is no Housing Authority relationship with the landlord. Instead, SCCHA will request a copy of the lease to establish tenancy and determine the DRA subsidy payment.

Relation to Statutory Objectives

This activity supports the statutory objective of increasing housing choices.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in this fiscal year.

Cost Implications

SCCHA anticipates this activity will reduce administrative costs.

Authorization for the Activity

The proposed activity is authorized by PIH Notice 2011-45: Parameters for Local, Non-Traditional Activities Under the Moving to Work Demonstration Program, and Attachment D(1) 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 982.401, 982.507 and 982.518, as necessary to implement SCCHA's MTW Plan.

Evaluation

MDRC will assist with data collection and analysis, including how DRA recipients balance cost, housing quality, and location, how landlord react, leasing success rates, housing stability, and administrative costs and burden.

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

This activity is a rent reform activity. SCCHA will apply the Hardship Policy to recipients of Direct Rental Assistance.

2012-4: CREATE AFFORDABLE HOUSING PRESERVATION FUND FOR SCCHA & AFFILIATE OWNED HOUSING *(RE-Proposal)*

Activity Description

Part of The Housing Authority's mission is to provide stable, quality affordable housing to people with low and moderate incomes. In this activity, SCCHA uses its broader use of funds authority to ensure the long-term stability and viability of existing SCCHA and affiliate-owned rental housing properties.

SCCHA has a substantial portfolio of properties that need capital investment and potentially re-syndication of tax credits to maintain the quality and quantity of units provided to low-, very low, and extremely low-income seniors and families. In this activity, SCCHA conducts detailed capital needs assessments and reviews financial projections at each site, establishes priorities for rehabilitation and refinancing, and explores options for upgrading units over a multi-year period.

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 expense 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.

SCCHA is now amending this activity to allow the Housing Authority to provide loans to its own properties or affiliate owned properties for operations, capital needs and transactional costs. This amendment will broaden the use MTW funds for preservation work that is outside the major fiscal repositioning of assets, like investor buyouts, but can be important and essential for the long-term maintenance and affordability of properties.

Relation to Statutory Objectives

This activity supports the statutory objective of expanding housing choices for low-income families.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in this fiscal year.

Special Purpose Vouchers

This activity does not use vouchers, therefore SCCHA is not requesting any Special Purpose Vouchers be included.

Cost Implications

SCCHA anticipates costs may increase due to adding loans to the activity. The loans can be paid back so, ostensibly the cost will be offset at the time of repayment.

Authorization for the Activity

The proposed activity is authorized in Attachment D and Attachment C(B)(1) 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.

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

This activity does not qualify as a Rent Reform Initiative.

2017-2: DIRECT REFERRAL PROGRAMS (FORMERLY SPECIAL NEEDS DIRECT REFERRAL PROGRAM) (RE-Proposal)

Activity Description

Approved in 2017, this activity allows SCCHA to accept project-based voucher referrals from Santa Clara County's community queue, managed by the County's Office of Supportive Housing.

This activity is very similar to 2009-5: Chronically Homeless Direct Referral Program and there is one MOU governing both programs. The Housing Authority is requesting authorization to combine these 2 initiatives into one activity, and re-title the activity to “Direct Referral Programs.”

Additionally, the Housing Authority plans to broaden the referral sources to be utilized to fill designated PBV units. The local Regional Center is among the new partners who will be sending referrals for project-based voucher units. Referrals from local cities will be sent through the County’s community queue process.

The changes to this activity will streamline the required reporting to report on all direct referral project-based voucher programs under one umbrella.

Relation to Statutory Objectives

This activity supports the statutory objective of expanding housing choices for low-income families.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in this fiscal year.

Special Purpose Vouchers

SCCHA would like to include Mainstream vouchers and HUD-VASH vouchers in this approval.

Cost Implications

SCCHA does not anticipate additional costs due to the re-proposal of this activity.

Authorization for the Activity

This proposed activity is authorized in HACSC’s Moving to Work Agreement, Attachment C, Paragraph D(4) and waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 CFR 982 Subpart E, 982.204 and 98.3 Subpart F as necessary to implement the Agency’s Annual MTW Plan. This authorization is needed to enable participants of the SNP Direct Referral Program to bypass the HUD mandated waiting list protocol.

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

This activity does not qualify as a Rent Reform Initiative.

IV. Approved MTW Activities (HUD Approval Previously Granted)

To date, SCCHA has had 67 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, SCCCHA 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, FY2021, FY2025

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.

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).

UPDATE ON MTW ACTIVITY

SCCCHA re-proposed this activity in FY2025 to waive certain interim reexamination requirements introduced through the Housing Opportunity Through Modernization Act (HOTMA) and maintain current policies for processing interim increases in income 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 SCCCHA 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.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED SIGNIFICANT CHANGES

SCCHA 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 SCCHA 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 SCCHA. SCCHA will continue to use this activity in FY2026.

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

Section III –MTW Activities | Implemented

This will be closed out in the FY25 MTW Report as it is combined with 2017-2.

PLANNED NON-SIGNIFICANT CHANGES

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

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

SCCHA continues to use this activity.

PLANNED NON-SIGNIFICANT CHANGES

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

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

UPDATE ON MTW ACTIVITY

SCCHA 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

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

PLANNED SIGNIFICANT CHANGES

SCCHA 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 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. SCCCHA 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

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

PLANNED SIGNIFICANT CHANGES

SCCCHA 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 SCCCHA to effectuate an immediate change in voucher size and its corresponding payment standard when changes in family composition or SCCCHA'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

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

PLANNED SIGNIFICANT CHANGES

SCCCHA 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

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

UPDATE ON MTW ACTIVITY

SCCCHA 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 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 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, SCCHA is able to cost-effectively and efficiently ensure that these project-based units are available.

UPDATE ON MTW ACTIVITY

SCCHA awarded PBVs to a Housing Authority-owned project, Hawthorn and plans to self-award in FY2026 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 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 SCCHA 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 SCCHA's responsiveness to the needs of families with members who have disabilities, which provides increased housing choices by enabling them to secure an accessible unit more expeditiously.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED SIGNIFICANT CHANGES

SCCHA 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 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 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 FY2026. 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 FY2026 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 FY2026 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 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 FY2026. 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 FY2026 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 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 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 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 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 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 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

Section III –MTW Activities | Implemented

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 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 (& RE-PROPOSED)

PLAN YEAR APPROVED: FY2017 IMPLEMENTED: FY2019 AMENDED: 2025

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

This activity is being re-proposed in this Plan.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED SIGNIFICANT CHANGES

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

ACTIVITY 2017-3: LANDLORD INITIATIVES

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 SCCCHA 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 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 SCCCHA payment standards higher than 110 percent of the Fair Market Rent (FMR), if necessary, without HUD approval. This activity will give SCCCHA 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 FY2026.

PLANNED NON-SIGNIFICANT CHANGES

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

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 SCCCHA, 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 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 SCCCHA 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. SCCCHA 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 SCCCHA 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 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

Section III –MTW Activities | Implemented

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 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

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 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 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 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 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 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 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 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 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 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

Under this activity, SCCHA may also provide Housing Choice Vouchers to residents who opt to leave the park, in addition to those who are permanently relocated.

PLANNED SIGNIFICANT CHANGES

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

2025-1: SMALL AREA FAIR MARKET RENTS

PLAN YEAR APPROVED: FY2025 IMPLEMENTED: FY2025 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

SCCHA modified the Small Area Fair Market Rent(SAFMR) Rules to allow flexibility to set payment standards above 110% in certain zip codes to mitigate involuntary displacement. SCCHA may

consider multiple factors, including but not limited to: Disparity between SAFMR and actual rents based on third-party market reports and HCV program data; The number of families that would be negatively impacted by a reduction in payment standards; Disparate impacts by race/ethnicity or family types; Alignment with city/county strategies targeting areas for anti-displacement or revitalization efforts. This flexibility allows SCCHA to expand affordable housing and preserve affordability in lower cost communities.

UPDATE ON MTW ACTIVITY

SCCHA implemented the activity upon HUD's approval of the FY2025 Plan.

PLANNED NON-SIGNIFICANT CHANGES

There are no planned non-significant changes to 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

PLAN YEAR AMENDED: FY2025

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.

This activity was amended in FY2025 due to recent HUD regulations and guidance on HOTMA Section 104's asset limitation provision:

- SCCCHA 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.
- SCCCHA will align with HUD regulations when determining whether a property is exempt from this requirement.
- SCCCHA is expanding this activity to apply to Public Housing units.
- SCCCHA will exempt the following groups from the asset limitation: residents of units converting to Section 8 PBRA or PBV through the Rental Assistance Demonstration (RAD); residents that are given Public Housing or Section 8 assistance due to other

property acquisition, redevelopment, or conversion activities.

SCCHA plans to implement this activity when SCCHA implements HOTMA Section 104 as directed by HUD.

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.

2025-2: Income Exclusions

PLAN YEAR APPROVED: FY2025

This activity authorizes additional income exclusions that differ from HUD regulations in order to support family self-sufficiency and reduce administrative burden for staff and families:

- The full amount of student financial assistance
- The full amount of full-time student earned income and adoption assistance payments
- Payments from pilot guaranteed basic income (GBI) programs with discrete beginning and end dates

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

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2010-1 Eliminating 100% Excluded Income from the Income Calculation Process	With the publication of PIH Notice 2013-4, issued January 28, 2013, the verification and calculation of 100% excluded income is no longer required. Therefore, SCCHA eliminated this activity in FY2013. This activity saved labor time and costs.	This activity was closed out in FY2013
2012-1 Create Standard Utility Allowance Schedule	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 FY2013
2012-5 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 FY2023
2014-1a & 2014-1b 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 FY2022
2014-2 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 FY2022
2014-3 Freeze on Contract Rent Increases	This activity no longer serves the needs of our local community.	This activity was closed out in FY2023
2015-1 Using UPCS or Local Inspection Standards to Determine Housing Quality Standards	On June 25, 2014, HUD published in the Federal Register that, effective July 1, 2014, "A PHA may comply with the biennial inspection requirement through reliance upon an inspection conducted for another housing assistance program. If a PHA relies on an alternative inspection to fulfill the biennial inspection requirement for a particular unit, then the PHA must identify the alternative standard in its administrative plan." Therefore, this activity was closed without implementation because HUD's directive superseded this activity.	This activity was closed out in FY2015
2016-1 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 FY2022

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
2018-1 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 FY2022
2020-5 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 FY2021
2020-6 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 FY2021

V. Planned Application of MTW Funds

The information reported in Section V. serves as a placeholder until the FY2026 budget is approved by the SCCHA Board of Commissioners. At the time the FY2026 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 SCCHA to combine public housing operating and capital funds, including development and Replacement Housing Factor (RHF)/Demolition and Disposition Transition Fund (DDTF) funds, provided under Section 9, and tenant-based voucher program funds provided under Section 8 of the 1937 Act into a single, authority-wide funding source.

In FY2024, SCCHA 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.

SCCHA 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		
TOTAL:	\$158,803,994	\$158,803,994

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 FY2026 ANNUAL MTW PLAN AND CERTIFICATIONS OF COMPLIANCE

The SCCHA Board Resolution adopting the FY2026 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 FY2026 ANNUAL MTW PLAN

SCCHA’s FY2026 MTW Annual Plan was made available for public review from Feb 27 through March 28. The public hearing for the plan was held on March 13. No comments were received.

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

In FY2026, 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

Appendix One: Resolution No. 25-10

RESOLUTION NO. 25-10

RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE SANTA CLARA COUNTY HOUSING AUTHORITY APPROVING SUBMISSION OF THE FY2026 MOVING TO WORK ANNUAL PLAN TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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 of such Agreement through 2038; and

WHEREAS, currently in its seventeenth year of the MTW Program, SCCHA has drafted its FY2026 Moving To Work Annual Plan (**Plan**), solicited public comment and conducted a public hearing on the Plan; and

WHEREAS, the Board has reviewed the proposed FY2026 MTW Annual Plan, including any comments received and required certification.

NOW, THEREFORE, THE BOARD OF COMMISSIONERS OF SANTA CLARA COUNTY HOUSING AUTHORITY, DOES HEREBY RESOLVE, DETERMINE, AND ORDER AS FOLLOWS:

SECTION 1. The foregoing Recitals are true and correct and are incorporated herein by this reference.

SECTION 2. The Board of Commissioners of the Santa Clara County Housing Authority certifies the statements in the attached Certifications of Compliance with Regulations.

SECTION 3. The Board of Commissioners of the Santa Clara County Housing Authority approves the proposed FY2026 Moving to Work Annual Plan for the Santa Clara County Housing Authority and the Housing Authority of the City of San Jose.

SECTION 4. The Board of Commissioners of the Santa Clara County Housing Authority authorizes SCCHA to submit the proposed FY2026 Moving to Work Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both the Santa Clara County Housing Authority and Housing Authority of the City of San Jose.

SECTION 5. The Clerk of the Board shall certify to the adoption of this Resolution, which, shall in turn, have immediate effect.

PASSED, APPROVED, and ADOPTED this 3rd day of April 2025.

Jennifer Loving
Jennifer Loving (Apr 8, 2025 12:28 PDT)

Jennifer Loving, Chair

ATTEST:

Claudia Bautista

Claudia Bautista
Clerk of the Board

APPROVED AS TO FORM:

Adrian R. Guerra

Adrian R. Guerra (Apr 8, 2025 09:12 PDT)

Adrian R. Guerra
General Counsel

STATE OF CALIFORNIA }
COUNTY OF SANTA CLARA } ss.
SANTA CLARA COUNTY HOUSING AUTHORITY }

I, Claudia Bautista, Clerk of the Board, do hereby certify that the foregoing Resolution No. 25-10 was adopted at a regular meeting of the Board of Commissioners of Santa Clara County Housing Authority held on the 3rd day of April 2025, by the following vote of the Board:

AYES: Commissioners: Chair Jennifer Loving, Vice Chair Denis O'Neal, Kristina Loquist, Marilyn Russell, Ericka Mendieta

NOES: None

ABSTAIN: None

ABSENT: Commissioners: William Anderson, Adrienne Lawton

Claudia Bautista

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 (07/01/2025), 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.), the Violence Against Women Act (34 U.S.C. § 12291 et seq.), and 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 signed certification by the appropriate State or local official (form HUD-50077-SL) that the Plan is consistent with the applicable Consolidated Plan, which includes any applicable fair housing goals or strategies for the MTW PHA's jurisdiction and a description of the way the MTW Supplement is consistent with the applicable Consolidated Plan (24 CFR 91.2, 91.225, 91.325, and 91.425).
- (7) The MTW PHA will affirmatively further fair housing in compliance with the Fair Housing Act, 24 CFR 5.150 et. seq, 24 CFR 903.7(o), and 24 CFR 903.15, which means that it will take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing requires meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. 24 CFR 5.151. The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.
- (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 the Fair Housing Act and Act's prohibition on sex discrimination, which includes sexual orientation and gender identity, and 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not base a determination of eligibility for housing based on actual or perceived sexual orientation, gender identity, or marital status and will not otherwise discriminate because of sex (including sexual orientation and gender identity), 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' for people with physical disabilities.
- (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.

- (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 and should be made available electronically, upon request.

Housing Authority of the City of San Jose

CA056

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Jennifer Loving

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL**TITLE**

Jennifer Loving
Jennifer Loving (Apr 8, 2025 12:28 PDT)

04/08/2025**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**

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- (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 and should be made available electronically, upon request.

Santa Clara County Housing Authority

CA059

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

Jennifer Loving

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL**TITLE**

Jennifer Loving
Jennifer Loving (Apr 8, 2025 12:28 PDT)

04/08/2025**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.*

County of Santa Clara

Office of Supportive Housing

150 W. Tasman Drive, San Jose, CA 95134
(408) 278-6400 Main
(669) 220-1444 Fax



April 2, 2025

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

RE: FY2026 Moving to Work Plan Certification of Compliance

Dear Mr. Prince:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2026 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 FY2026 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 kj.kaminski@osh.sccgov.org should you have any questions or require additional information.

Sincerely,

Kathryn J. Kaminski

Acting Director, County of Santa Clara Office of Supportive Housing

Appendix Two: Certifications of Payments (HUD 50071)

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 Officer, 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

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.

(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)

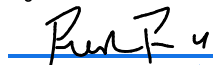
Name of Authorized Official

Preston Prince

Title

Executive Director

Signature



Preston Prince (Apr 15, 2025 17:57 PDT)

Date (mm/dd/yyyy)

04/15/2025

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 Officer, 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

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.

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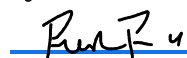
Name of Authorized Official

Preston Prince

Title

Executive Director

Signature


Preston Prince (Apr 15, 2025 17:57 PDT)

Date (mm/dd/yyyy)

04/15/2025

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

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.)

1. Type of Federal Action: ☐ NA a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance		2. Status of Federal Action: ☐ NA a. bid/offer/application b. initial award c. post-award		3. Report Type: ☐ NA a. initial filing b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: ☒ Prime ☐ Subawardee Tier _____, if known: Santa Clara County Housing Authority 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></u> Preston Prince (Apr 15, 2025 17:57 PDT) Print Name: <u>Preston Prince</u> Title: <u>Executive Director</u> Telephone No.: <u>(408) 993-2903</u> Date: <u>04/15/2025</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.)

1. Type of Federal Action: ☐ NA a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance		2. Status of Federal Action: ☐ NA a. bid/offer/application b. initial award c. post-award		3. Report Type: ☐ NA a. initial filing b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: ☒ Prime ☐ Subawardee Tier _____, if known: Santa Clara County Housing Authority 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></u> Preston Prince (Apr 15, 2025 17:57 PDT) Print Name: <u>Preston Prince</u> Title: <u>Executive Director</u> Telephone No.: <u>(408) 993-2903</u> Date: <u>04/15/2025</u>		
Federal Use Only:				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	