MTW REPORT

FY 2021-2022

July 1, 2021 to June 30, 2022

The following report was prepared per HUD 50900 Form (OMB Approval No. 2577-0216).

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Approved by HUD: TBD



MESSAGE FROM PRESIDENT AND CEO

Opportunity Home San Antonio — formerly the San Antonio Housing Authority — has had the privilege

to operate with a Moving-to-Work designation since 2009 which allows for the exploration of new

programs, processes and policies for housing assistance programs and the creation of solutions that

give families in San Antonio an opportunity to succeed.

As our families continue to overcome the repercussions of the COVID-19 pandemic, we continue to

support them by providing supportive services and leveraging available community resources.

Opportunity Home faces several challenges of its own, serving fewer households than anticipated. The

organization served 94% of the planned number of households with voucher utilization in the private

rental market seeing the largest impacts.

Operational, administrative and housing challenges have impacted our ability to serve residents with

employee turnover and increased rental prices. The organization is taking measures and actively

currently hiring for various positions through numerous communications channels.

Today, the organization has increased its Small Area Fair Market Rental standards to 97-106%,

supporting more than 1,000 families who are looking to utilize their voucher after hosting a Lease Up

Fair event in 2022.

No matter the obstacles placed in front of us, Opportunity Home is committed to serving residents and

providing the best services to help them succeed in life.

As President and CEO, I am honored to represent more than 20,000 families — nearly 60,000

residents — and work alongside more than 500 employees to develop sustainable affordable housing

solutions that will help residents succeed.

Ed Hinojosa, Jr.

President and CEO

Opportunity Home San Antonio

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Opportunity Home San Antonio Leadership

formerly known as San Antonio Housing Authority (SAHA)

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Viridiana Rivera, Assistant Director of Community Development Initiatives Lorraine Robles, Director of Development Services and Neighborhood Revitalization Janie Rodriguez, Assistant Director of Human Resources

Stephanie Rodriguez, Director of Assisted Housing Programs

Joel Tabar, Interim Director of Public Housing & Director of Community Development Initiatives

Katie Tran, Manager of Data Analytics

Policy, Planning & MTW Contacts

Richard L. Milk, Planning Officer Sara Eaves, Sr. Policy & Planning Manager Rosario Plascencia, Policy, Planning, and Evaluation Manager Esteban Spongberg, Policy & Planning Data Analyst

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Overview

Opportunity Home San Antonio provides housing to over 65,000 children, adults, and seniors through three housing portfolios – Public Housing, Housing Choice Vouchers, and Mixed-Income housing programs. Opportunity Home employs approximately 525 people and has an annual operating budget of \$176 million. Existing real estate assets are valued at over \$500 million.

Opportunity Home's involvement with Moving to Work (MTW) dates back to M ay 2000, when Opportunity Home implemented its initial MTW demonstration program in three Public Housing communities: Mission Park Apartments, Wheatley Courts, and Lincoln Heights Courts. In 2009, Opportunity Home signed an amended and restated agreement with the U.S. Department of Housing and Urban Development (HUD) to make the MTW demonstration an organization-wide program.

The MTW designation provides Opportunity Home with the flexibility to design and test innovative approaches to enhance the Organization's programs. The MTW designation also provides funding flexibility by combining Public Housing operating subsidies, Capital Fund Program (CFP) grants, and Housing Choice Voucher (HCV) program subsidies into a single fund block grant.

The following section provides an overview of Opportunity Home's short-term accomplishments and summarizes the organization's progress towards long-term goals and objectives.

Short-term Accomplishments

Progress towards long-term goals and objectives

Update on Opportunity Home's long-term planning

STRATEGIC PLAN

The Strategic Plan describes the organization's priorities for the next five years. It also describes how those priorities connect to a shared understanding of the environment in which the Organization works (theory of change), the impact of the Organization's work on the broader community, questions that are critical to research, and annual implementation strategies.

GUIDING PRINCIPLES AND STATEMENTS

- Vision: Compassionate, equitable, and vibrant communities where people thrive
- **Mission**: Improve the lives of residents by providing quality affordable housing and building sustainable, thriving communities.
- **Impact Statement**: The San Antonio area has a high quality of life where all are thriving -- starting with Opportunity Home residents.
- **Values:** The Organization has adopted a set of core values.
 - Equity: Opportunity Home delivers services in a manner that creates fair outcomes, not
 just equal opportunities. Equity ensures that systems -- policies, programs, and rules -do not create unfair results.
 - Compassion: Opportunity Home delivers services in a manner that relieves suffering and improves the quality of life of residents.
 - Excellence: Opportunity Home delivers services in a manner that sets high standards

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and improves continuously

LONG-TERM OUTCOMES

The strategic plan focuses on priority outcomes for two key populations, residents and employees. Six outcomes have been identified as high priorities:

Two employee-focused outcomes

- Employees respect and value equity, diversity and inclusion
- Employees thrive at work

Four Resident-focused outcomes

- Residents have meaningful housing choice
- Residents live in quality homes
- Residents feel safe
- Residents have affordable utilities

In FY2022 (July 2021 - June 2022), surveys went out to all residents to capture changes to resident sentiment since baselines established the previous year. The results of this survey provided valuable strategic plan information. First, the survey results updated key indicators for the four priority resident-focused strategic plan outcomes (see list above). Second, the survey results also updated the list of key challenges to achieving each of the four priority outcomes. In some cases, the survey results confirmed the importance of existing strategies, in other cases they challenged them. Several planning groups decided to reassess and rebuild strategies to better reflect and respond to resident feedback. Additionally, the Employees Thrive at Work planning group researched, proposed, and finalized a new employee survey that went out in July 2022. The organization's emphasis on Equity continued with the posting and recruitment of a new position, Director of Equity, Diversity, and Inclusion.

The strategic plan is being updated through a process that will periodically assess the following plan elements in light of new information:

- 1. Theory of Change
- 2. Guiding Statements (Vision, Mission, Impact)
- 3. Navigation: Outcomes, Indicators, Targets, Strategies
- 4. Impact: Neighborhood, Local Economy, Social
- 5. Performance Monitoring: Operational, Financial, Resident

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Featured Success Stories

This year the Organization is honored to share a few of the many success stories from families we have been able to support through a combination of our Family Self-Sufficiency Program and Moving to Work investments.

Anthony

Anthony couldn't remove the smile from his face.

Getting the news recently that he was hired on as a Utility Technician at the San Antonio Water System "felt like I hit the lottery."

Anthony is an Opportunity Home Housing Choice Voucher resident and a graduate of the organization's ConnectHome San Antonio program. He credits the program's teachers for helping him update his resume to better position himself for jobs. Anthony said he updated his career history and fonts at their suggestion to make his resume more professional.



"(Opportunity Home) is a big part of my support team here in Texas," said Anthony, who is from Alton, Ill. "This is why I moved here - to do better things for my family."

At SAWS, Anthony said he will be driving the organization's trucks and hauling trailers to job sites. A 15-year passion of "fixing and building things" has prepared Anthony - who holds a Commercial Drivers License - to take on the job.

"I can go to work and enjoy it, and not be stressed," he said.

Anthony said his hiring at SAWS boosted his confidence and reminded him he can get through the "tough times." He hopes that his new job can pave the way for him to start his own trucking business in the future. He says his two children - ages 5 and 7 - serve as his inspiration for achieving his career goals.

"They keep me going," Anthony said. "They mean the most to me. I can't make a mistake and mess up stuff with them."

Anthony encourages other Opportunity Home residents to achieve their career goals.

"You have to get through bad times to get through good times," he said. "You can't let a little thing bring you down."

Sylvia

Sylvia credits the ConnectHomeSA Program for giving her the tools and confidence to be a boss.

Sylvia, a Opportunity Home Housing Choice Voucher resident, is currently applying the skills she learned from the program toward her Shopify online store business, which she has been running for more than a month. Skills from the program she is putting to use as an entrepreneur include email, social media and internet website design.

In addition to learning technology tools, Sylvia — who graduated from the program in 2021 — said ConnectHomeSA educators instilled focus in her to be a successful entrepreneur.

"I want to be successful and leave (a legacy for my children)," Sylvia said.

Opportunity Home residents who participate in the ConnectHomeSA program take seven digital training courses and earn a free digital device after completing training.

Sylvia operates her online store from her device, selling adult and baby products, personal hygiene items and party favorites — really, "everything and more."

"I have to make sure everything is up to par," she said. "I take my time and make sure I do everything right, so I won't have any problems with things falling through loops and cracks."

Sylvia encourages other Opportunity Home families aiming to start their own businesses or pursue other careers to maintain focus on achieving their goals.

"Give it all your best," she said. "Stay focused and keep trying."

LuCretia

LuCretia's move to Lincoln Heights Courts three and a half years ago served as a fresh start for the former Certified Nursing Assistant.

The COVID-19 pandemic and health issues forced her to leave behind a 22-year career in the medical field.

During her residency, LuCretia has been seeking her next career. And thanks to Opportunity Home's Jobs Plus Program, she may have brushed up against her next move.



LuCretia, along with 10 other Lincoln Heights Courts residents, earned a Commercial Painting Certificate from Sherwin Williams and the Building Talent Foundation after completing a free week-long training course at the Lincoln Heights Courts Jobs Plus Office.

Prior to participating in the course — which provided teachings of basic painting skills — LuCretia said she held no previous painting experience.

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"I never thought I would do painting," she said. "It's fun and amazing all around the board to have (the class) paid for, and to be certified."

Painting basics wasn't the only thing LuCretia picked up during the weeklong course.

LuCretia said she also learned about employment and contracting opportunities she can apply her certification toward. LuCretia is aiming to get a painting job, and plans to own her own business down the line.

"I am really grateful to the staff," she said. "They have helped me with the motivation to keep going. Being active and being hands on was really fun."

Ana

To Ana, the Alazan Courts will forever be a reminder of a fresh start.

Ana and her six children moved to the Courts in 2018 after residing in a homeless shelter for a few months. Alazan gave Ana both a new home and a new opportunity to better her life.

Since moving to the neighborhood, Ana said she has thrived as an outreach worker at the San Antonio Fatherhood Campaign, where she has received four



pay raises and two promotions. Ana is working toward a long term goal of becoming a homeowner.

"(Living) at the Alazan has made me a whole new person and mom," Ana said. "As a young parent, I didn't know if I was going to have bread and bologna to feed my kids. I am thriving financially today. If it wasn't for the Alazan-Apache Courts, my kids and I wouldn't have a smile on our faces."

Because of her success, Ana gives back to the Alazan community by sharing resources with her neighbors and volunteering to take care of their children if they need to tend to personal matters.

"On Friday nights, you'll see me around Alazan talking to parents and even introducing myself to a parent I've never seen before," she said. "Before I moved in, I didn't have a community. Today, I have a community."

Janet

Janet is determined to see her neighbors succeed in life.

The four-year Alazan resident happily refers them to job resources or opportunities to join the Resident Council, in which she serves as vice president.

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Janet says she feels acts of kindness can go a long way toward inspiring others to adopt the same mindset and become successful.

"You never know how you can influence someone's life by just doing something nice for them," she said.

Janet said she aims to continue recruiting neighbors into Resident Council so they can "change their life completely just like I have."

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II. GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION

i. Actual New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-B ASED (Planned*)	NUMBER OF VOUCHERS NEWLY PROJECT-BASE D (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
100 Labor	44	0	Not committed	No	100 Labor, an approximately 213-unit multifamily project is located at 100 Labor Street.
Total: Planned or Actual Newly Project-Base d	44	0			

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

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

The project is planned to have a project-based assistance contract (PBA); however, the organization is also planning to commit modified project-based vouchers in the event the PBA contract is not able to move forward. Final approvals for the project are pending as of the writing of this report.

ii. Actual Existing Project Based Vouchers

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

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

PROPERTY NAME	NUMBER OF PROJECT -BASED VOUCHER S (Planned*)	NUMBER OF PROJECT -BASED VOUCHER S (Actual)	STATUS AT END OF PLAN YEAR**	RAD?	DESCRIPTION OF PROJECT
Gardens at San Juan	31	31	Leased / Issued	No	Mixed-income Community
East Meadows	8	8	Leased / Issued	No	Initial phase of Choice Neighborhood
Wheatley Park Senior	36	36	Leased / Issued	No	Final phase of Choice Neighborhood
Woodhill	35	35	Leased / Issued	No	Beacon Community - 10 support Next Step Housing Program (FY21-1 Activity) & 25 support VASH PBVs (Note: VASH PBVs are not funded through MTW and are only subject to specific MTW policies per HUD approval)
Rosemont at Highland Park	20	20	Leased / Issued	No	Beacon Community - supports Family Homeless Referral Program (FY15-3 Activity)
Total: Planned and Actual Existing Project-Based	130	130			

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

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

None.

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

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

ACTUAL OTHER CHANGES TO MTW HOUSING STOCK IN THE PLAN YEAR

PH: 40 units from Legacy @ Alazan came online during the month of December 2021. HCV: Added 111 vouchers backdated effective for FY2021. Enhanced vouchers TX006VO0350 Ridgecrest 29 vouchers and TX006VO0363 Granada Homes 82 vouchers were added to the MTW program. Total MTW adjusted baseline denominator for vouchers is 12,351.

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

LNT: Legacy @ Alazan, which has 40 LNT units (88 total), and Tampico, which has 136 LNT units (200 total), came online in FY22. Costa Valencia, which has 88 LNT units (230 total units), used MTW funds in June 2021.

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

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

Grant	Grant Amount	FYB Cumulative Expended	FYE Cumulative Expended	Expended During FY2022	Remaining To Expend	% Expended
2018 Safety & Security	\$ 250,000	\$ 0	\$ 250,000	\$ 250,000	\$ 0	100%
2019 CFP	\$ 12,929,611	\$ 11,718,421	\$ 12,929,611	\$ 1,211,190	\$ 0	100%
2020 Lead Based Paint	\$ 4,861,055	\$0	\$0	\$0	\$ 4,861,055	0%
2020 CFP	\$ 13,046,754	\$ 4,406,910	\$ 9,768,600	\$ 5,361,690	\$ 3,278,154	75%
2021 CFP	\$ 13,184,301	\$0	\$ 3,094,387	\$ 3,094,387	\$ 10,089,914	23%
2022 CFP	\$ 16,156,991	\$0	\$0	\$ 0	\$ 16,156,991	0%
		TOTAL FY22	\$ 26,042,599	\$ 9,917,267	\$ 34,386,113	

Property	Description
Alazan Apache	Foundation Repairs/Fire Damage
Blanco	Emergency Air Cooled Chiller Compressor
Cassiano	Burn Units Rehabilitation (8 units)
Charles Andrews	Construction Materials Observation-Testing; A/E Substantial Rehab
Cheryl West	Roof Replacement
College Park	Elevator Repair and Replacement
Cross Creek	Fire Rebuild Unit #704; Parking Lot Resurfacing; Ground Survey
Escondida	MEP Plumbing Repairs
Fair Avenue	Fire Protection Improvements; MEP Elevator Repairs
Highview	A/E Drainage Improvements Project
LC Rutledge	Roof Replacement
Le Chalet	Replace Water Heater & Gas Rod
Lila Cockrell	Roof Replacement; Parking Lot; Elevator Repairs
Lincoln	Connect Home - Computer Lab; A/E Site Survey-Design; New Windows
Madonna	Natural Gas System-Boiler Rm- Parking Lot; A/E Feasibility Study; Floor Drains
PHA Wide	Operations 1406; Administration 1410; CFP PM-Inspector Salaries
PHA Wide	CFFP Debt Service

PHA Wide	Environmental Reviews; Physical Needs Assessment
Parkview	Roof Replacement; Elevator Repairs
Riverside	S&S Solar Lights and Wireless Cameras
San Pedro Arms	Emergency MEP - Boiler; Elevator Replacement; Water Heater
T.L. Shaley	Burn Unit Duplex Reconstruction; Unit Conversion - 829 Rita
Victoria Plaza	Comprehensive Modernization
Villa Hermosa	Chiller Installation; MEP and Fire Protection Study
Villa Tranchese	Fire Protection Improvements; Chiller; Sump Pumps; Fence
Villa Veramendi	S&S Solar Lights and Wireless Cameras
W.C. White	MEP Consultant Emergency Generator Replacement

B. LEASING INFORMATION

i. Actual Number of Households Served

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

NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Planned^^	NUMBER OF UNIT MONTHS OCCUPIED or LEASED* Actual	NUMBER OF HOUSEHOLD S SERVED** Planned^^	NUMBER OF HOUSEHOLD S SERVED** Actual
MTW Public Housing Units Leased	71,172	66,360	5,931	5530
MTW Housing Choice Vouchers (HCV) Utilized	146,880	125,532	12,240	10,461
Local, Non-Traditional: Tenant-Based	N/A	N/A	N/A	N/A
Local, Non-Traditional: Property-Based	2,532	6,168	211	514
Local, Non-Traditional: Homeownership	N/A	N/A	N/A	N/A
Planned and Actual Totals:	220,584	198,060	18,382	16,505

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

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

The organization served fewer households than planned as a direct result of unanticipated challenges related to the ongoing pandemic. For public housing, the organization planned to serve 5,931 or 98% of the 6,052 projected units. For HCV, the organization planned to serve 100% of the MTW adjusted baseline of 12,240. In January 2022, the organization rolled 111 enhanced vouchers into the MTW baseline retroactively increasing the baseline to 12,351.

^{** &}quot;Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied or Leased" by the number of months in the Plan Year (as shown in the Annual MTW Plan).

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

The differences in both programs between planned and actual households served is related to ongoing operational, administrative, and housing market challenges. The organization's experience is consistent with other organizations that saw increased employee resignations during "The Great Resignation" in late 2021 and unprecedented rental market pressures over the last year. According to local reports, the average rental price is between 12%¹ and 23%² more expensive than it was last year -- placing our local market in the top ranking for cities across the nation seeing large spikes in rent prices³.

These systemic challenges have impacted both programs; though, in slightly different ways. In public housing, the organization has experienced high staff turnover and continues to address challenges in hiring maintenance technicians, as well as supply chain challenges experienced by our vendors, have resulted in slower unit turnaround and decreased leasing/occupancy levels.

In HCV, the organization is working on a number of fronts to address the difficulties that HCV households are facing when trying to utilize their voucher in the competitive rental market. In the fall of 2021 and summer of 2022, the organization opened the waitlist. During FY2022, Opportunity Home has increased payment standards to 97-106% of SAFMRs and made adjustments to the FY2019-1 SAFMR activity. The organization hosted a lease up fair to support 1,400 families searching for new homes. As of June 2022, the organization currently is supporting 1,145 families who are shopping with their voucher -- the highest volume of voucher shoppers the organization has seen in recent years.

In addition, the effects of the pandemic include an increase in the waitlist, as well as an increase in call volume. We are making it easier for residents to reach us by making updates to the website that facilitate commenting. We continue to meet with the local HUD Field Office on a regular basis to review issues and align responses.

For local, non-traditional households, the organization planned to serve at least the same number served in FY2021. Due to additional MTW investments in new construction and preservation, the organization served more households than anticipated.

https://www.ksat.com/news/local/2022/07/18/report-san-antonio-apartment-rents-are-up-12-since-2021/#:~:text=Report%3A%20San%20Antonio%20apartment%20rents%20are%20up%2012%25%20since%202021. accessed September 12, 2022.

² https://www.mysanantonio.com/realestate/article/San-Antonio-rent-apartments-increase-17299385.php. accessed September 12, 2022.

³ <u>https://sanantonio.culturemap.com/news/real-estate/06-06-22-san-antonio-biggest-spikes-in-rent-says-new-study/.</u> accessed September 12, 2022.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY (NAME and NUMBER)	NUMBER OF UNIT MONTHS OCCUPIE D or LEASED Planned^^	NUMBER OF UNIT MONTHS OCCUPIE D or LEASED Actual	NUMBER OF HOUSE-H OLDS SERVED Planned^^	NUMBER OF HOUSE-H OLDS SERVED Actual
Tenant-Based	Name/#	#	#	#	#
Property-Based	FY2011-1e: Preservation & Expansion	2,532	6,168	211	514
Homeownership	Name/#	#	#	#	#
Р	2,532	6,168	211	514	

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

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

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
Program Name/Services Provided	NA	NA

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

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND SOLUTIONS
MTW Public Housing	The Organization will begin implementing a revamped eligibility process. This should help streamline the eligible applicant pool and centralized housing offers. Additionally, transfer policies related to newly developed properties will be revised.
MTW Housing Choice Voucher	The Organization continues to select applicants from the waitlist to ensure MTW baseline is met. In addition, the Organization implemented a pre-eligibility process to increase the voucher utilization success rate. The Organization is also experiencing other issues including: decrease in landlord participation, low staffing levels, and other rental market changes.
Local, Non-Traditional	None.

C. WAITING LIST INFORMATION

i. Actual Waiting List Information

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

WAITING LIST NAME	DESCRIPTION	WAITING LIST		WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
All	All unique holds	86,702	Open	

WAITING LIST NAME	DESCRIPTION	SCRIPTION NUMBER OF HOUSEHOLD S ON WAITING LIST STATUS (OPEN, PARTIALLY OPEN OR CLOSED)		WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Section 8 Tenant Voucher	Voucher	3,033	Closed	Reopened on June 29, 2022 and closed July 13, 2022
La Posada Mod Rehab	Site-Based	34,917	Open	Yes
Prospect Hill Mod Rehab	Site-Based	1,392	Open	Yes
Serento Mod Rehab	Site-Based	24,711	Open	Yes
Accessible Unit	For applicants who require a 504 accessible unit	270	Open	List became active on January 14, 2022
Elderly Mix Public Housing	For applicants who are 62 and above or who have a documented disability (they may be under the age of 62).	1,206	Open	List became active on January 14, 2022
Family Public Housing	For applicants who are in families	7,413	Open	List became active on January 14, 2022
Public Housing Site based	Site-Based	48,618	Closed	No
East Meadows PBV	Project Based Voucher Site Based	17,645	Closed as of 6/21/21	No
Gardens at San Juan Square PBV	Project Based Voucher Site Based	37,891	Closed as of 6/21/21	No
Wheatley Park Senior PBV	Project Based Voucher Site Based	789	Open	Yes
PBV Referred Beacon	Project Based Voucher Site Based	1	Open	Yes
Emergency Housing Voucher WL	This waitlist is used exclusively for EHV referrals from our partner SARAH.	84	Open as of 7/1/21	Yes

Please describe any duplication of applicants across waiting lists:

Total number of unique applicants is 86,702

ii. Actual Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Public Housing Site based, Accessible Unit, Elderly Mix Public Housing, Family Public Housing	This waitlist became closed to future applicants effective midnight January 14, 2022. Future PH applicants will be added to 3 new PH waitlists: Family, Elderly Mix, and Accessible Unit.
Section 8 Tenant Voucher	This waitlist was open for 15 days in September 2021 to accept 5,000 applications and for 15 days beginning June 29, 2022 to accept 10,000 applications.

D. INFORMATION ON STATUTORY OBJECTIVES AND REQUIREMENTS

i. 75 percent of Families Assisted Are Very Low Income

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

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80%-50% Area Median Income	158
49%-30% Area Median Income	18
Below 30% Area Median Income	19
Total Local, Non-Traditional Households Admitted	195

ii. Maintain Comparable Mix

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

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)

FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENT S*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	2,617	3,952	NA	6,569	36%
2 Person	873	2,134	NA	3,007	16%
3 Person	998	2,338	NA	3,336	18%
4 Person	730	2,004	NA	2,734	15%
5 Person	401	1,178	NA	1,579	9%
6+ Person	317	917	NA	1,234	7%
TOTAL	5,936	12,523	NA	18,459	100%

^{* &}quot;Non-MTW Adjustments" are defined as factors that are outside the control of the MTW PHA and/or unrelated to the MTW PHA's local MTW program. An example of an acceptable "Non-MTW Adjustment" would include

demographic changes in the community's overall population. If the MTW PHA includes "Non-MTW Adjustments," a thorough justification, including information substantiating the numbers given, should be included below. MTW PHAs must continue to adhere to all fair housing obligations as detailed in the MTW Certifications of Compliance.

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

There are no non-MTW Adjustments to the distribution of household sizes. Baseline percentages of household sizes to be maintained were established using the most complete historical dataset that included household size. The reported data in the Organization's FY 2011-2012 report for FY2011-1e Activity was used to set the baseline—this is a snapshot of occupancy as of June 30, 2012.

MIX OF FAMILY SIZES SERVED (in Plan Year)

FAMILY SIZE	BASELINE MIX PERCENTAG E**	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR^	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR^^	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	40%	6,519	39%	10%
2 Person	18%	3,073	19%	16%
3 Person	15%	2,589	16%	-13%
4 Person	13%	2,080	13%	-16%
5 Person	8%	1,280	8%	-14%
6+ Person	6%	964	6%	-17%
TOTAL	100%	16,505	100%	NA

- ** The "Baseline Mix Percentage" figures given in the "Mix of Family Sizes Served (in Plan Year)" table should match those in the column of the same name in the "Baseline Mix of Family Sizes Served (upon entry to MTW)"
- ^ The "Total" in the "Number of Households Served in Plan Year" column should match the "Actual Total" box in the "Actual Number of Households Served in the Plan Year" table in Section II.B.i of this Annual MTW Report.
- ^^ The percentages in this column should be calculated by dividing the number in the prior column for each family size by the "Total" number of households served in the Plan Year. These percentages will reflect adjustment to the mix of families served that are due to the decisions of the MTW PHA. Justification of percentages in the current Plan Year that vary by more than 5% from the Baseline Year must be provided below.

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

(1) Demographic Change: The city of San Antonio continues to see significant demographic change that justifies the variation. First, there has been an increase in the proportion of the population aged 62 years and older and a decrease in the proportion of its population under 18 years old. Second, the city has seen a decrease in the proportion of households and families below the poverty level who have children. Both of these demographic shifts are consistent with the increase in one- and two-person households and the decrease in three-plus person households. These shifts in demographics are also evident among households served by Opportunity Home through MTW.

San Antonio city, Texas				
	2016-2020	2011-2015	Statistical	Percent
	Estimates	Estimates	Significance	Change

Population	Under 18 years	24.8%	25.9%	Yes	-4%
	62 years and over	15.2%	14.0%	Yes	9%

Source: American Community Survey Comparative Demographic Estimates (CP05); 2018 and 2013 Five-Year Estimates

San Antonio city, Texas					
		2016-2020 Estimates	2011-2015 Estimates	Statistical Significance	Percent Change
Households by Type	Households with one or more people under 18 years	33.1%	36.2%	Yes	-9%
Percentage of families and people whose income in the past 12 months is below the poverty level	With related children of the householder under 18 years	20.0%	23.2%	Yes	-14%

Source: American Community Survey Comparative Social Estimates (CP02) and Comparative Economic Estimates (CP03); 2020 and 2015 Five-Year Estimates

(2) Housing Market Change: The city of San Antonio continues to see shifts in the proportion of housing units with no bedrooms and one bedrooms while also experiencing a decrease in the proportion of units with three bedrooms.

San Antonio c	ity, Texas				
		2016-2020	2011-2015	Statistical	Percent
		Estimates	Estimates	Significance	Change
Bedrooms	Total housing				
bearooms	units	555,138	535,145	Yes	
	No bedroom	3.30%	2.40%	Yes	4%
	1 bedroom	17.10%	16.60%		38%
	2 bedrooms	24.30%	24.50%		3%
	3 bedrooms	37.90%	39.00%	Yes	-1%
	4 bedrooms	15.00%	15.20%		-3%
	5 or more				
	bedrooms	2.40%	2.30%		-1%
Source: America	bedrooms an Community Survey C			9 and 2015 Five-Year	

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

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

MTW ACTIVITY (NAME and NUMBER)	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF SUFFICIENCY*	MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY
FY2013-2 Simplified Earned Income Disregard	0	Definition: PH household who is paying a flat rent
FY2014-6: Rent Simplification	3	for at least 6 months or a HCV household utilizing a zero HAP voucher
Across all PH and HCV households under MTW	20	for at least 6 months.
	3	(Households Duplicated Across MTW Activities)
	20	Total Households Transitioned to Self-Sufficiency

^{*} Figures should match the outcome reported for all activities where the goal of increased self-sufficiency is used in Section IV of this Annual MTW Report.

III. PROPOSED MTW ACTIVITIES: HUD Approval Requested

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

IV. APPROVED MTW ACTIVITIES: HUD Approval Previously Granted

This section includes a report out on all MTW Activities by their status.

Summary

Below is a list of approved MTW activities in the implemented status for FY2022.

Current Activity	Status
11-1e- Preservation and Expansion of Affordable Housing	Implemented/Ongoing
11-9- Allocate tenant-based voucher set-asides for households referred by non-profit sponsors who provide supportive services	Implemented/Ongoing
13-2- Simplified Earned Income Disregard (S-EID) (Public Housing)	Implemented/Phasing Out
13-4- HQS Inspection of SAHA-owned non-profits by SAHA inspectors	Implemented/Ongoing
14-3- Faster Implementation of Payment Standard Decreases (HCV)	Implemented/Ongoing
14-6- HCV Rent Reform	Implemented/Ongoing
15-1- MDRC / HUD Rent Study	Closed out in FY2022
15-2- Elderly Admissions Preference at Select Public Housing Sites	Implemented/Ongoing
15-3- Modified Project Based Vouchers	Implemented/Ongoing
19-1- Local Implementation of SAFMR	Implemented/Ongoing
19-2- Alternate Recertification Process (PH and HCV)	Implemented/Ongoing
20-1- College & University Homeless Assistance Program	Implemented/Ongoing
20-3- Family Self Sufficiency (FSS) Program Streamlining	Implemented/Phasing Out
20-4- Time Limited Workforce Housing Pilot Program (PBV)	Closed out in FY2022
21-1- Next Step Housing Program (THRU Project)	Implemented/Ongoing
21-2- Limiting increases in rents	Implemented/Ongoing
22-1- SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions	Implemented

A. IMPLEMENTED ACTIVITIES

Implemented Activities: MTW activities in which the MTW PHA is actively engaged.

FY2011-1e - Preservation and expansion of affordable housing

I. Plan Year Approved, Implemented, Amended

Plan Year (Fiscal Year)

MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2011	FY2011	NA

II. Description/Impact/Update

Description: This activity is designed to increase housing choices. It operationalizes the preservation and expansion policies adopted in FY2011, by utilizing the local, non-traditional unit authorization under Opportunity Home's broader uses of funds authority and securing the approval to combine RHF funds into the MTW block grant to construct new affordable units (defined as units reserved for households with income at or below 80% area median income or AMI). While Opportunity Home may develop new communities with market-rate units in addition to affordable units; this activity does not authorize the use of RHF funds for the development of those market-rate units. It is also important to note that Opportunity Home's flexibility to construct and/or preserve new Section 8/9 units are authorized under the single-fund flexibility only and outcomes are reported in the sources and uses section of this report (Section V). The only units authorized under this activity are units reserved for households with income at or below 80% AMI that are non-Section 8/9.

Impact & Update: This activity is implemented, ongoing, and on schedule. The tables below compare the baselines and benchmarks for each metric. All outcomes have met the benchmarks and no explanation is therefore necessary. This fiscal year, the organization used MTW flexibilities to preserve units at Costa Valencia and expand units at Bristol at Somerset, Legacy at Alazan, 100 Labor, and Aspire at Tampico. See Section V for more information.

HUD Standard metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or	implementation of the	units of this type after implementation of the		Benchmark met
below 80% AMI as a result of the activity (increase).	0	0	524	

HC #2: Units of Housing Preserved				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?

Number of housing	Housing units	Expected housing	Actual housing units	
units preserved for	preserved prior to	units preserved after	preserved after	
households at or	implementation of the	implementation of the	implementation of the	
below 80% AMI that	activity (number)	activity (number).	activity (number).	Benchmark met
would otherwise not				
be available	0	0	230	
(increase).				

- III. Actual Non-Significant Changes: None.
- IV. Actual Changes to Metrics/Data Collection: None.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2011-9 – Allocate set-asides of tenant-based vouchers for households referred by non-profit partners who will provide supportive services to those households

I. Plan Year Approved, Implemented, Amended

		Plan Year (Fiscal \	Year)
MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2011	December 2011	NA

II. Description/Impact/Update

Description: Opportunity Home allocates set-asides of tenant-based vouchers for households referred by non-profit partners who commit to provide supportive services. The set-asides are for households with specific priority needs, such as those who are homeless. Current partners are the Center for Health Care Services (CHCS), San Antonio Metropolitan Ministries (SAMM), and South Alamo Regional Alliance for the Homeless (SARAH). Partners provide a needs assessment of the household in order to qualify and certify them as homeless as defined by HUD. Once the household is determined eligible by the partners, the household is referred to Opportunity Home and placed on the waiting list. When the household is selected from the Opportunity Home waiting list, Opportunity Home processes all referrals in accordance with HUD guidelines and the Opportunity Home voucher program Administrative Plan. The household is scheduled for an appointment with Opportunity Home staff to determine eligibility. Once the household is determined eligible they complete documents necessary for processing. One requirement of the program is that partners provide intensive case management for one year to every household participating in the program. Partners provide reports to Opportunity Home on a quarterly basis.

Impact & Update: This activity is fully implemented, ongoing, and on schedule. At fiscal year end, the Organization had secured partner-provided supportive services for 240 households housed through the set-aside voucher programs. Housing stability indicators remain below benchmark. The tables below compare the baselines and benchmarks for each metric. As indicated in the table, the

Organization continues to work with referring partners to increase utilization and facilitate stable housing.

HUD Standard metrics

HC #7: Households /	HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of	Baseline	Benchmark	Outcome	Benchmark	
Measurement				Achieved?	
services aimed to	prior to implementation of the	households receiving these services after implementation of the	Actual number of households receiving these services after implementation of the activity (number).	referrals from	
	0	up to 340	240 (down 28 from 268 in FY2021)	partners to increase utilization for this program.	

Opportunity Home metrics

Maintain Households Served				
Unit of	Baseline	Benchmark		Benchmark
Measurement				Achieved?
Percentage of households served		90%	55%	
that continue to be housed after 2 years	0	90%	(up 3% from 52% in FY2021)	Benchmarks not met but have increased
Percentage of households served that continue to be housed after 1 years	0	90%	59% (up 11% from 48% in FY2021)	since the last reporting cycle.

III. Actual Non-Significant Changes: None.

- **IV. Actual Changes to Metrics/Data Collection:** None, the organization will be revising the data collection and metrics for this activity during FY2023 and will report on those changes in the subsequent report (FY2023 MTW Report) as well as include the changes in the forthcoming FY2024 MTW Plan.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: This activity is experiencing two main challenges:
 - 1. Low Utilization of Set-Aside Vouchers: This challenge extends to all the organizations voucher programs. Opportunity Home is taking several steps to increase overall voucher holder leasing success which includes the leasing of these set-asides:
 - Opened the waitlist in the fall 2021; re-opening waitlist this month
 - Increasing the payment standards to 97-106%
 - Hosting a lease up fair to support the 1,400 families searching for new homes
 - Considering using MTW flexibility to offer Landlord leasing incentives/ bonus
 - Considering using MTW flexibility to assist voucher holders with deposits

- Considering converting existing or newly acquired communities to MTW to increase affordability (500 units)
- 2. Low Housing Stability: The organization continues to see housing stability at one and two-years hovering in the 50% to 60% range. At the start of the activity, the organization set an aspirational goal of 90%. Given the performance of these metrics over the last four to five years, continued discussions with partners on the challenges residents who are facing or have faced homelessness, and the ongoing impacts of the pandemic on our local housing market; the organization will be not only exploring how we can improve our understanding of housing stability through additional data related work, but also how this activity can be better aligned with the organization's strategic priorities.

FY2013-2 - Simplified Earned Income Disregard (S-EID)

I. Plan Year Approved, Implemented, Amended

		Plan Year (Fiscal Y	rear)
MTW Statutory Objective(s)	Approved	Implemented	Amended
Promote Self-Sufficiency and Reduce cost and	FY2013	FY2014	NA
increase cost effectiveness			

II. Description/Impact/Update

Description: This activity expands the number of months for which EID (referred to as earned-income disregard or earned-income disallowance) is available to participants from 24 months to 60 months, and makes the benefit available continuously during the 60 months, without start/stop. Income is disregarded on a sliding scale based on year of participation: During year 1, 100% of earned income is disregarded; Year 2: 80%; Year 3: 60%; Year 4: 40%; and Year 5: 20%.

The head, spouse, or co-head of the household qualifies the entire household (formerly only Head of Household could participate). Opportunity Home has completed research on the ability to reconcile various program requirements around escrows and EID for Family Self-Sufficiency (FSS) households. Because the program requirements cannot be reconciled, FSS households are no longer eligible for the S-EID. Participation in the Jobs-Plus program remains a requirement for S-EID participants.

Starting in FY2016, Opportunity Home required participating households to attend quarterly financial counseling sessions, in order to ensure that families are given all the tools and knowledge necessary to succeed. At the time of the referral, staff schedule an appointment with financial counseling providers such as Family Service Association or the Financial Empowerment Center. Participating households need to attend the counseling sessions within the time to process the change, or within one month of processing.

For participants who are unable to attend an in-person session, online options are provided and monitored by staff. Jobs-Plus Staff monitor attendance, and follow up with members to ensure they are on track. Should they fail to attend, staff report back to management when a member lapses. A hardship provision allows a grace period for unforeseen circumstances.

Impact & Update: Opportunity Home continues to phase SEID out -- as of this reporting cycle, there is only one resident who remains on the policy. This activity will be superseded by a new activity or a re-proposed activity in FY2024 MTW Plan to continue the elimination of EID for both public housing and housing choice voucher program.

HUD Standard metrics

SS #5: Households Assisted by Services that Increase Self Sufficiency					
Unit of Measurement	Baseline	Benchmark	Outcomo	Benchmark Achieved?	
households receiving	Halicahalde racaivina	households receiving self-sufficiency services after	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Benchmark met: organization is phasing out existing households	
SS #8: Households T	ransitioned to Self S	,	!	ļ.	
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	households paying a flat rent for at least 6 months) prior to implementation of the activity (number). This number may be zero.	flat rent for at least 6 months) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (Number of households paying a flat rent for at least 6 months) after implementation of the activity (number).	Benchmark met: organization is phasing out existing households	
	rror Rate of Task Exe	ecution			
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
completing a task as	task prior to implementation of the	error rate of task after	implementation of the	Benchmark met	

III. Actual Non-Significant Changes: None.

IV. Actual Changes to Metrics/Data Collection: The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA

can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #5: Increase in Agency Rental Revenue
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status (#)
- SS #3: Increase in Positive Outcomes in Employment Status (%)
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2013-4 – HQS Inspection of Opportunity Home-owned non-profits by Opportunity Home inspectors

I. Plan Year Approved, Implemented, Amended

Plan Year (Fiscal Year)

MTW Statutory Objective(s)	Approved	Implemented	Amended
Reduce cost and increase cost effectiveness	FY2013	FY2013	NA

II. Description/Impact/Update Provide a description of the MTW activity and detailed information on its impact during the Plan Year. Provide the applicable Standard HUD Metrics tables with numerical information for baselines, benchmarks and outcomes for the Plan Year. Describe how outcomes compared to baselines and benchmarks. Indicate whether the MTW activity is on schedule. NOTE: For rent reform/public housing term limit activities, describe the number and results of any hardship requests and details regarding the required "Annual Reevaluation" that the MTW PHA put in place when proposing the MTW activity.

Description: This activity allows Opportunity Home inspectors (instead of third-party contractors) to inspect and perform rent reasonableness assessments for units at properties that are either owned by Opportunity Home under the Organization's non-profit portfolio, Beacon Communities, or owned by an Opportunity Home-affiliate under the Organization's partnerships portfolio.

Impact & Update: This activity is implemented, ongoing, and on schedule. The tables below compare the baselines and benchmarks for each metric. All outcomes have met the benchmarks and no explanation is therefore necessary.

HUD Standard metrics

CE #1: Agency Cost Savings				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?

Total cost of task in	Cost of task prior to	Expected cost of task	Actual cost of task	
dollars (decrease)	implementation of the	after implementation	after implementation	
	activity (in dollars).	of the activity (in	of the activity (in	Benchmark met.
		dollars).	dollars).	Savings = \$33,477
	4270 inspections *	4270 inspections *	4270 inspections *	
	\$42.90 = \$183,183	\$35.06 = \$149,706	\$35.06 = \$149,706	

III. Actual Non-Significant Changes: None.

IV. Actual Changes to Metrics/Data Collection: During FY2022 reporting cycle, the organization identified data quality improvements that corrected the under-reporting of the number of inspections completed under the activity. This improved data sourcing will now better align and integrate HCV inspections data with other organizational data.

The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).

- CE #2: Staff Time Savings
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2014-3 - Faster Implementation of Payment Standard Decreases (HCV)

I. Plan Year Approved, Implemented, Amended

	Plan Year (Fiscal Year)			
MTW Statutory Objective(s)	Approved	Implemented	Amended	
Increase Housing Choices	FY2014	FY2014	NA	

II. Description/Impact/Update

Description: Currently, when Fair Market Rent (FMR) is reduced and the payment standard is adjusted accordingly, the reduced payment standard is applied at each participant's second regular reexamination. This activity will allow Opportunity Home to apply the lower payment standards at each participant's next reexamination (Move, Interim and/or Annual reexaminations). If the participant's rent portion increases as a result of applying the new payment standard, Opportunity Home will provide the participant a 30-day notice of rental increase. The per unit cost will be calculated by the total housing assistance payments divided by the total number of units leased each month. The housing assistance payments expense will be obtained from the monthly financial statements and the total units will be obtained from the Unit Month Report.

Impact & Update: The SAFMRs increased in FY2022; therefore, this waiver was not utilized during the fiscal year.

HUD Standard metrics

CE #1: Agency Cost Savings					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Total cost of task in dollars (decrease).	implementation of the	Expected cost of task after implementation of the activity (in dollars).		Activeu:	
	12,129 Annual Average Households Served (FY2014) multiplied by \$568.43	12,129 Annual Average Households Served (FY2014) multiplied by \$568.43	NA	NA NA	

- III. Actual Non-Significant Changes: None.
- IV. Actual Changes to Metrics/Data Collection: None.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2014-6 - HCV Rent Reform (14-6 Rent Simplification (HCV) & 15-4- Simplified Utility Allowance Schedule)

I. Plan Year Approved, Implemented, Amended

Plan Year (Fiscal Year)

Activity Name	MTW Statutory Objective(s)	Approved	Implemented	Amended
14-6 Rent	Reduce cost and increase cost	FY2014	FY2016	NA
Simplification (HCV)	effectiveness			
15-4- Simplified Utility	Reduce cost and increase cost	FY2015	FY2015	NA
Allowance Schedule	effectiveness			

II. Description/Impact/Update

Description: This activity has two elements: (1) simplified rent calculation (previously approved under FY2014-6: Rent Simplification) and (2) simplified utility allowance schedule (previously approved under FY2015-4: Simplified Utility Allowance Schedule).

(1) Rent simplification: Traditionally, rent calculation is based on 30% of the participant's adjusted monthly income. This activity lowers the percentage used to calculate rent to 27.5% of monthly gross

income for all MTW HCV participants and new admissions, and eliminates deductions (i.e., medical and child care) with minimal impact to the participants' rent portion. MTW participants who experience a rent increase of \$26 or more due to the rent simplification calculation will have the household's Total Tenant Payment (TTP) calculated in accordance with 24 CFR 5.628 (i.e., non-MTW TTP calculation). Participants who are granted a hardship exemption will remain exempt until their rent portion falls below the \$26 threshold. Hardship exemptions under this provision will be verified at each annual and interim reexamination. Opportunity Home is 1 of 4 MTW agencies participating in a rent reform study. Households who are not part of the study (approximately 2,000) will follow FY2014-6 rent policies.

(2) Simplified Utility Allowance Schedule: Traditionally, Opportunity Home annually reviews and periodically re-establishes a Utility Allowance Schedule which represents reasonable utility cost expectations as part of a tenant's lease. The Utility Allowance Schedule is based on utility surveys and analysis of the type of structure, bedroom size, appliances provided by tenant, and type of appliances (gas/electric).

This activity establishes a new, simplified schedule that is based on the analysis of data collected from Opportunity Home's existing HCV portfolio including the most common structure and utility types. The simplified schedule reduces administrative costs associated with the traditional method of applying a Utility Allowance Schedule. Specifically, the activity will allow the HCV department to be more cost effective by reducing staff time spent on calculating multiple utility schedules for 6 different structure types plus various utility types such as gas, electric or propane.

Note that this activity applies only to HCV participants that are not part of FY2015-1 MDRC/HUD Rent Study. If a household is selected to participate in the control or treatment group of the Rent Study, they will be subject only to FY2015-1, and not this activity FY2015-4.

The simplified utility allowance schedule is also anticipated to benefit property owners, who will have a more accurate understanding of the total gross rent to be applied to their properties, and to benefit participants, who will be able to use this new schedule to clarify gross rent in their selection of housing units.

The new utility allowance schedule is implemented at the time of recertification, interim or change of unit. The schedule will be applied to the lesser of these two options:

- the actual size of the unit, or
- the size of the voucher.

Opportunity Home will continue to use current market consumption data to determine when adjustments to the simplified schedule are needed (upon change of more than 10% in rates).

Impact & Update: This activity is implemented, ongoing, and on schedule. There are no concerns with the cost-savings indicator. The organization did see an increase in the error rate. High staff turnover and the resulting lost knowledge base contributed to data entry mistakes which in turn caused the

error rate to increase. New QA/QC procedures have been implemented to ensure utility allowance rates are being correctly input.

HUD Standard metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark
	Average Staff Salary * 1 hours * # of households processed \$25.58 * 1 * 4,377 = \$111,964	.25 hours * # of	.25 hours * # of households processed	Benchmark
CE #3: Decrease in	Error Rate of Task Ex	ecution		
Unit of Measurement	Baseline	Benchmark	(Outcome I	Benchmark Achieved?
_	_	rate of task after implementation of the	rate of task after implementation of the	Whether the outcome meets or exceeds the benchmark. Benchmark not met

III. Actual Non-Significant Changes: None.

- **IV. Actual Changes to Metrics/Data Collection:** The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).
 - CE #2: Staff Time Savings
 - CE #5: Increase in Agency Rental Revenue
 - SS #1: Increase in Household Income
 - SS #3: Increase in Positive Outcomes in Employment Status (#)
 - SS #3: Increase in Positive Outcomes in Employment Status (%)
 - SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

V. Actual Significant Changes: None.

VI. Challenges in Achieving Benchmarks and Possible Strategies: The benchmark for indicator CE #3 was not met. The organization did see an increase in the error rate. High staff turnover and the resulting lost knowledge base contributed to data entry mistakes which in turn caused the error rate to increase. New QA/QC procedures have been implemented to ensure utility allowance rates are being correctly input. New QA/QC

procedures have been implemented to ensure utility allowance rates are being correctly input. Additionally, targeted training for new staff with planned refreshers for all staff has been identified as a possible strategy.

FY2015-2 - Elderly Admissions Preference at Select Public Housing Sites

I. Plan Year Approved, Implemented, Amended

	Plan Year (Fiscal Year)		
MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2015	FY2015	NA

II. Description/Impact/Update

Description: This activity establishes a 4-to-1 elderly admissions preference at specific communities in order to increase housing choices for elderly households. The goal of the activity is to address continuing concerns of elderly residents at specific communities regarding lifestyle conflicts between elderly and non-elderly residents. Property Management's ability to address these conflicts is reduced significantly when the ratio of non-elderly to elderly residents rises above a certain proportion. The 4-to-1 admissions preference is proposed in order to create and maintain an optimal mix of elderly and non-elderly residents in each community.

The idea of an optimal mix is based on research of the reaction to a 1995 Massachusetts law that attempted to limit the percentage of non-elderly disabled tenants living in state-funded elderly housing. In 2002, the Massachusetts Office of Legislative Research provided an update on the success of the 1995 law, which had established optimal proportions of 86.5% elderly and 13.5% non-elderly residents. Housing officials reported that the law had been largely successful in:

- reducing the number of problems that arise from these mixed populations sharing the same housing;
- slowing what had been a sharply increasing rate of non-elderly disabled households moving in;
- reducing the relatively high percentage of non-elderly disabled tenants in certain projects.

Housing advocates, however, suggested that the optimal proportion should be 80% elderly and 20% non-elderly residents. This MTW activity, FY2015-2, adopts the suggested 80/20 ratio ("4-to-1") both for its admissions preference as well as for its ultimate unit mix.

In practical terms, this activity allows the admission of four elderly applicants from the waiting list before admitting a non-elderly applicant, until such time as an optimal mix of elderly and non-elderly disabled residents is reached for the community. No residents will be required to relocate in order to meet these targets. The organization is not establishing a date by which to achieve the 80/20 target, and will rely solely on the normal resident turnover process to gradually transition the population balance.

Impact & Update: This activity is implemented, ongoing, and on schedule. The tables below compare the baselines and benchmarks for each metric. The benchmarks have been met within a reasonable / acceptable margin.

HUD Standard metrics

Unit of	HC #1: Additional Units of Housing Made Available Unit of Baseline Benchmark Outcome Benchmark					
Measurement	Dasetille	Delicilliark	Outcome	Achieved?		
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	type prior to	units of this type after implementation of the	1			
Total	231 units occupied by elderly family	378 units occupied by elderly family	336 units occupied by elderly family/ 105 additional units occupied by elderly family (336 minus 231)			
Fair Avenue	110 units occupied by elderly family	173 units occupied by elderly family	162 units occupied by elderly family/ 52 additional units occupied by elderly family (162 minus 110)	Benchmarks met		
WC White	38 units occupied by elderly family	60 units occupied by elderly family	60 units occupied by elderly family/ 22 additional units occupied by elderly family (60 minus 38)			
Lewis Chatham	60 units occupied by elderly family	95 units occupied by elderly family	93 units occupied by elderly family/ 33 additional units occupied by elderly family (93 minus 60)			
Marie McGuire	23 units occupied by elderly family	50 units occupied by elderly family	21 units occupied by elderly family/ 0 additional units occupied by elderly family (21 minus 23)	Benchmark not met as implementation at property began in FY2022.		

Opportunity Home metrics

Elderly Household F	Elderly Household Percentage				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Percentage of units occupied by elderly households	Percentage of units occupied by elderly households prior to implementation of the activity	Expected percentage of units occupied by elderly households after implementation of the activity	Actual percentage of units occupied by elderly households after implementation of the activity	Benchmarks met	
Total	51%	80%	73%		
Fair Avenue	51%	80%	79%		
WC White	51%	80%	82%		
Lewis Chatham	51%	80%	79%		
Marie McGuire	34%	80%	34%	Benchmark not as implementation at property began in FY2022.	

- **III. Actual Non-Significant Changes**: The organization originally planned to implement the policy at Marie McGuire in FY2021; however, the implementation was delayed until FY2022.
- **IV. Actual Changes to Metrics/Data Collection:** Metrics were updated to include Marie McGuire.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2015-3 - Modified Project Based Vouchers

I. Plan Year Approved, Implemented, Amended

Plan Year	ˈ(Fiscal	l Year)
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MTW Statutory Objective(s)	Approved	Implemented	Amended
Reduce cost and increase cost effectiveness	FY2015	FY2015	NA
and increase housing choices			

II. Description/Impact/Update

Description: First, this activity allows Opportunity Home to commit vouchers to developments in the organization's new and existing properties. The vouchers increase the number of units that are affordable to households based on their actual ability to pay. For example, a tax credit rent affordable to a 30% AMI household will be affordable to a 4-person household earning \$17,640 or more. However, many households earn much less than that, and a 4-person household earning \$10,000 (typical for Opportunity Home-assisted households) is not able to afford a tax credit rent affordable to a 30% AMI household. This activity applies only to commitment of vouchers to Opportunity Home-owned or controlled units. Any commitment of vouchers to privately-owned developments will be made through a competitive process outside the scope of this activity.

Secondly, this activity also increases cost effectiveness by removing the automatic provision of a tenant-based voucher to a household who wishes to relocate from a unit associated with a local project based set aside voucher. This stabilizes overall occupancy at the communities where vouchers are committed.

Impact & Update: This activity is implemented, ongoing, and on schedule. The tables below compare the baselines and benchmarks for each metric. The benchmarks have been met within a reasonable / acceptable margin. At fiscal year end, the Organization had not project-based any new vouchers under this activity as planned. This activity continues to provide deeper affordability to households as a result of the income-based rents versus tax-credit restricted rents. Per the metric table, the actual AMI level of households is well below the upper AMI limit and targeted upper AMI limit.

HUD Standard metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	this type prior to implementation	units of this type after implementation of the	Actual housing units of this type after implementation of the activity (number).	
Previously added units Gardens at San Juan Square (FY15) East Meadows (FY17) Wheatley Senior Park Senior Living (FY18) Woodhill (FY20) Rosemont at Highland Park (FY20)	0	31 8 36 10 20	31 8 36 10 20	Benchmark met

Median household income				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?
Median income of	AMI upper limit of	Targeted AMI upper	Actual AMI of	
households living in	households living in	limit of households	households living in	
local project based	units	living in units	units	
set-aside voucher				
units, by income				Danahmayla mat
bracket				Benchmarks met.
80% AMI	80% AMI	75% AMI	NA - no households	
60% AMI	60% AMI	55% AMI	NA - no households	
50% AMI	50% AMI	45% AMI	39% AMI	
30% AMI	30% AMI	25% AMI	15% AMI	

III. Actual Non-Significant Changes: None.

- **IV. Actual Changes to Metrics/Data Collection:** The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).
 - CE#1 Cost Savings
 - CE#2 Staff Time Savings
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2019-1 - Local Small Area Fair Market Rent (SAFMR) Implementation

I. Plan Year Approved, Implemented, Amended

Plan Year (Fiscal Year)

MTW Statutory Objective(s)	Approved	Implemented*	Amended
Increase Housing Choices	Phase I - FY2019	July 1, 2019	
	Phase II - FY2020	January 2020	Amended

^{*}Because Opportunity Home meets with clients 120 days in advance of their certification date, the transition to phase I of the new policy was effective October 1,2018 for new admissions and moves and November 1, 2018 for recertifications. The transition to phase II of the new policy was effective January 1, 2020 for new admissions and moves and February 1, 2020 for recertifications and interim re-examinations.

II. Description/Impact/Update

Description: This activity is designed to achieve the MTW statutory objective to increase housing choices for low-income families, by creating payment standards that better reflect market conditions in different parts of San Antonio, and so making a larger number of San Antonio neighborhoods affordable for voucher households. This activity is a local implementation of HUD's Small Area Fair Market Rents (SAFMR).

Because of the potential impact (positive and negative) on a large number of voucher households, this activity phases in SAFMR over multiple fiscal years in order to control for negative and unanticipated consequences, to make use of the latest research and market data, and to maintain a constant number of households served. Below are the principles and parameters the Organization used in developing this activity:

- (1) Maintain Number of Households Served
 - No decrease in capacity to serve the same number of households
- (2) Minimize Negative Impact
 - Minimize negative impact for existing households in low-cost neighborhoods
 - No disparate impact on protected classes, including locally recognized classes (sexual orientation, gender identity, veteran status, and age)
- (3) Make the SAFMR as easy to use as possible

- Households and landlords have limited time and resources; program design should facilitate program implementation
- (4) Leverage the Value of the Voucher
 - Maximize value of vouchers in targeted growth areas and rapidly changing neighborhoods

Overview of Phases

	Phase I	Phase II
Implementation	New Admissions & Moves: Oct 1, 2018	New Admissions & Moves: Jan 1, 2020 to
	to Dec 31, 2019	present
	Recertifications & Interims: Nov 1,	Recertifications & Interims: Feb 1, 2020 to
	2018 to Jan 31, 2020	present
Geography	2 Tiers	10 Groupings
Subsidy Cap	Subsidy cap for higher cost Tier	None
Voucher Payment	MAFMRs	SAFMRs
Standard (PS)	Voucher PS set outside basic range	Voucher PS set outside basic range
Hold Harmless Policy	Hold harmless until clients enters into a	new HAP contract
Exception Overlay	Automatic for existing clients in	Automatic for movers only in identified
	identified areas	areas
	Targeted geography	Targeted geography

Impact & Update: This activity is implemented, ongoing, and on schedule. This fiscal year the organization has continued to experience operational and administrative challenges in addition to unprecedented rental market pressures impacting the housing choice voucher program. Despite this, the organization is still seeing a higher proportion of households moving to areas of the jurisdiction where they previously were not (see HC#5).

HUD Standard metrics

HC #5: Increase in Resident Mobility				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
move to a better unit and/or neighborhood of opportunity as a	move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number).	able to move to a better unit and/or neighborhood of opportunity after implementation of the	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Benchmark met
"Better" defined as moving to Groups 4-10	· · · · · · · · · · · · · · · · · · ·	41% (453 movers + 356 new admissions) moved to a unit located in Groups 4-10	50% (430 movers + 190 new admissions) moved to a unit located in Groups 4-10	

Opportunity Home metrics

Lease-up Success Rate by Post-Move Group					
Unit of	Unit of Baseline Benchmark Outcome Benchmark				

Measurement				Achieved?
Percent of vouchers			Group 1: 61%	
issued that were			Group 1 - EO: 64%	This indicator is
leased-up within 120			Group 2: 67%	intended to help the
days			Group 2 - EO: 0%	organization monitor
			Group 3: 71%	whether anyone
			Group 3 - EO: 50%	grouping is
	89%	89%	Group 4: 70%	experiencing
			Group 5: 58%	relatively lower lease
			Group 6: 64%	up success rates that
			Group 7: 66%	may or may not be
			Group 8: 67%	related to payment
			Group 9: 59%	standards
			Group 10: 75%	

Average # of days searching by Post-Move Group				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?
Average number days			Group 1: 71	
between the date			Group 1 - EO: 92	This indicator is
the voucher is issued			Group 2: 71	intended to help the
and the date the			Group 2 - EO: 134	organization monitor
request for tenancy			Group 3: 73	whether anyone
(RTA) is approved.			Group 3 - EO: 77	grouping is
	58 days	58 days	Group 4: 64	experiencing
			Group 5: 90	relatively longer
			Group 6: 70	search times that may
			Group 7: 83	or may not be related
			Group 8: 61	to payment standards
			Group 9: 79	
			Group 10: 56	

Average HAP by Gro	Average HAP by Group					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?		
Average Housing Assistance Payment by Group	Group 1: \$601 Group 1 - EO: \$609 Group 2: \$608 Group 2 - EO: \$591 Group 3: \$614 Group 4: \$620 Group 5: \$690 Group 6: \$603 Group 7: \$707 Group 8: \$847 Group 9: \$755 Group 10: \$876	Group 1: \$601 Group 1 - EO: \$609 Group 2: \$608 Group 2 - EO: \$591 Group 3: \$614 Group 4: \$620 Group 5: \$690 Group 6: \$603 Group 7: \$707 Group 8: \$847 Group 9: \$755 Group 10: \$876	Group 1: \$559 Group 1 - EO: \$537 Group 2: \$570 Group 2 - EO: \$706 Group 3: \$610 Group 3 - EO: \$610 Group 4: \$604 Group 5: \$735 Group 6: \$690 Group 7: \$815 Group 8: \$791 Group 9: \$922 Group 10: \$1,308	This indicator is a monitoring only indicator The organization intends to use it to monitor HAP costs by Grouping		

Households moving	Households moving to a better neighborhood by Post-Move Group				
Unit of	Baseline	Benchmark	Outcome	Benchmark	
Measurement				Achieved?	
Percentage of					
households					
self-reporting					
that they consider the				Due to our oving	
unit for which they				Due to surveying challenges, the	
submitted a request	87%	87%	No data	organization is not	
to be in a better	07 70	07 70	INO data	able to report on this	
neighborhood than				indicator.	
their current place of				indicator.	
residence on					
post-move					
surveys (increase).					

HCV Concentration b	ICV Concentration by Group				
Unit of	Baseline	Benchmark	Outcome	Benchmark	
Measurement				Achieved?	
HCV households living	Group 1: 8%	Group 1: 8%	Group 1: 6%	This indicator is a	
in each Group as a	Group 2: 8%	Group 2: 8%	Group 2: 6%		
percentage of total	Group 3: 10%	Group 3: 10%	Group 3: 8%	monitoring only indicator The	
renter households	Group 4: 3%	Group 4: 3%	Group 4: 3%	organization intends	
	Group 5: 2%	Group 5: 2%	Group 5: 2%	to use it to monitor	
	Group 6: 3%	Group 6: 3%	Group 6: 3%	voucher concentration	
	Group 7: 2%	Group 7: 2%	Group 7: 3%	by Grouping to	
	Group 8: 0%	Group 8: 0%	Group 8: 1%	determine whether	
	Group 9: 1%	Group 9: 1%	Group 9: 1%	long-term shift	
	Group 10: 1%	Group 10: 1%	Group 10: 0%	long-term sinit	

- III. Actual Non-Significant Changes: Opportunity Home is taking several steps to increase overall voucher utilization including increasing the payment standards to 97-106% of SAFMRs. In addition, the organization updated ZIP code assignments to groups based on an analysis of FY2022 SAFMRs to ensure the groupings remain appropriate.
- **IV. Actual Changes to Metrics/Data Collection:** The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).
 - CE #1: Agency Cost Savings
 - CE #2: Staff Time Savings

Other metrics updates:

- Baselines and benchmarks were reset using the modified ZIP code Group assignments where appropriate.
- The Organization is not able to report FY2020 actuals for Households moving to preferred neighborhoods by Post-Move Tier. This metric relied on a survey and survey collection ended due to challenges in administering and overseeing administration of

the survey during several staffing transitions. During FY2021, staff reviewed the survey to make updates to questions and collection methodology in order to adapt to electronic processes in light of COVID-19 response. Additionally, staff have identified the need for two different types of surveys, a Post-Search survey and a Post-Move Survey, in order to record the full client experience in the move process. This work is currently on hold as the Organization addresses other challenges and priorities.

The Organization is not reporting on its own metric Increase in Resident Stability as
the Organization is waiting until Phase II has been in place for two years to allow for
movers to stay in place for at least 1 year. This metric was anticipated to be reported
this fiscal year, however, as a result of other challenges and priorities this work is also
on hold.

V. Actual Significant Changes: None

VI. Challenges in Achieving Benchmarks and Possible Strategies: The most significant challenge for this activity is the continued impacts of the pandemic and the current local market conditions. Improving current utilization in the housing choice voucher program is the top priority for the organization. The voucher operations staff are exploring and discussing how to utilize the administrative fee to fund incentives such as landlord incentives, lease-up incentive, and security deposits.

FY2019-2 - Alternate Recertification Process (PH and HCV)

I. Plan Year Approved, Implemented, Amended

			Plan Year (Fiscal	L Year)
Program	MTW Statutory Objective(s)	Approved	Implemented	Amended
PH	Increase Housing Choices	FY2018	FY2019	NA
HCV	Increase Housing Choices	FY2018	FY2020	NA

II. Description/Impact/Update

Description: This activity has three main components that are designed to streamline and simplify the recertification process: (1) alternate schedule, (2) alternate public housing review procedures, and (3) alternate income verification methods. It consolidates and updates three previously approved activities related to the first two elements (FY2014-4 Biennial Reexaminations, FY2014-5 Triennial Reexaminations, and FY2016-2 Biennial and Triennial Notification of Rent Type Option) and adds a new waiver for the third element.

1) Alternate Recertification Schedule (PH and HCV)

This proposed activity establishes biennial and triennial schedules for reexaminations for the low income public housing and housing choice voucher programs. The Organization has been using alternative schedules since 2011; this new activity streamlines the schedules across both programs. The effective change will move approximately half of public housing households from biennials to triennials; the other half of public housing households will remain on the biennial schedule. The

housing choice voucher program will maintain current reexamination schedules as established in FY2014 under FY2014-4/FY2014-5.

Every household will have the option of interim reexaminations if there is a change in household composition or income according to HCV and PH policy.

Beginning FY2016, SAHA created a local form with an expiration date of 39 months to replace the HUD-9886 Form with its 15 month expiration date. In the future, SAHA may create its own local forms with different expiration dates or other elements to accommodate this activity.

Definitions: For purposes of assigning a recertification schedule to each household, the Organization will utilize the following to apply the two schedules:

Triennial: A household is eligible for a triennial schedule if the household has at least one elderly or disabled household member and the household receives 100% of their income from fixed sources. SAHA defines fixed income as Social Security (SS), Supplemental Security Income (SSI), and/or pension.

Biennial: Households not eligible for a triennial schedule are eligible for a biennial schedule.

2) Alternate PH Review Procedures (PH only)

Typically in the low income public housing program, PHAs are required to review community service requirements and inform public housing residents of the option of paying income-based rent or a flat rent on an annual cycle. Additionally, PHAs are obligated to conduct annual updates of family composition for these public housing families who have chosen to pay flat rent regardless of HUD-allowed triennial recertifications for those families.

As residents move to biennial and triennial recertification schedules, it becomes more efficient to coordinate notification and update requirements in accordance with their new recertification schedules. Therefore, SAHA proposes to conduct review procedures related to community service requirements, flat rent notice and family composition updates for PH individuals at the time of reexamination.

3) Alternate Income Verification Methods (PH and HCV)

Currently, SAHA accepts self-certification for assets valued below \$5,000. In order to further streamline administrative processes, SAHA will accept the family's self-certification of the value of family assets and anticipated asset income for net assets totaling \$25,000 or less. Third-party verification of assets are still required for assets totaling a value more than \$25,000.

According to HUD's Verification Hierarchy, SAHA must send a form to third-party sources for verification of income if the tenant-provided documents are not acceptable or are disputed. In order to increase the rate of files completed in a timely manner, SAHA will skip the third-party verification form and instead use oral third party verification when tenant-provided documents are unacceptable.

In addition to streamlining methods of document verification, SAHA wanted to reduce the number of applicants re-submitting documents for approved extensions of voucher (if in HCV Program) and/or reasonable accommodations. SAHA has revised its policy to extend the length of time that applicant-provided documents would be valid for verification purposes. Applicant-provided documents

dated within 90 calendar days from the eligibility appointment would be valid. This does not apply to permanent documents such as social security cards, birth certificates, and identification cards.

Both methods will apply to the low income public housing and housing choice voucher programs.

Impact & Update: This activity is implemented, ongoing, and on schedule. The tables below compare the baselines and benchmarks for each metric. The organization did experience an increase in the CE #3 error rate metric during FY22. However this was expected, considering that there is a backlog of certifications due to unprecedented volume of interim recertification requests, resulting from income and household composition changes during the pandemic. It should be noted that the organization processed a comparable number of recertifications in FY2022 as in previous years.

HUD Standard metrics

CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease). Definition: Cost of staff time	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
	HCV: \$407,067 PH: \$201,964.50 Total: \$609,032	HCV: \$161,845 PH: \$108,806 Total:\$270,651 Expected savings: 338,381	HCV: \$118,371 PH: \$71,907 Total: \$190,278 Actual savings: \$418,754	Benchmark met

CE #3: Decrease in Error Rate of Task Execution				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement	Dasetine	Deficilitiate	Outcome	Achieved?
	Average error rate of	Expected average	Actual average error	Whether the
Avanaga annag nata in	task prior to	error rate of task	rate of task after	outcome meets or
Average error rate in completing a task as	i imniementation of	after implementation	implementation of	exceeds the
1 '	the activity	of the activity	the activity	benchmark.
a percentage	(percentage).	(percentage).	(percentage).	Deficilitark.
(decrease).	HCV: 16%	HCV: 16%	HCV: 22%	Benchmark not met.
	PH: 45%	PH:40%	PH: 41%	benchmark not met.

III. Actual Non-Significant Changes: None.

IV. Actual Changes to Metrics/Data Collection: The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).

- CE #2: Staff Time Savings
- CE #5: Increase in Agency Rental Revenue

V. Actual Significant Changes: None.

VI. Challenges in Achieving Benchmarks and Possible Strategies: The organization processed comparable recertifications in FY2022 as expected; however, the voucher program continues to experience a backlog of certifications due to unprecedented volume of interims as a result of income change and household composition changes. The increase in household circumstances that warrants recertifications is a result of the ongoing impacts of the pandemic. As such, in the FY2023 MTW Plan, the organization received approval to implement recertifications every three years. This is allowing the organization to process interim recertifications and delay annual recertifications.

FY2020-1 - College & University Homeless Assistance Programs

I. Plan Year Approved, Implemented, Amended

		Plan Year (Fiscal Y	rear)
MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2020	FY2021 for PAC	NA
		FY2022 for SPC	

II. Description/Impact/Update

Description: The activity supports the creation of a homeless set-aside program(s) in partnership with local college(s) and university(ies) to address the local housing needs of homeless college and/or university students.

The Organization is tackling this local housing need with a tenant-based set-aside voucher. Because these set-asides will have time limits, alternative eligibility requirements, and are married to homeless college/university pilot program(s), they are managed and reported on separately from the Organization's set-asides allocated under FY2011-9.

This activity allows the Organization to initially set-aside up to 20 tenant-based housing choice vouchers for households referred by Palo Alto College (PAC) and up to 30 tenant-based housing choice vouchers for St. Philip's College. The Organization may set-aside additional vouchers to support additional college(s) and/or university(ies) who enter into a partnership with the Organization.

Students seeking housing vouchers through the Homeless Assistance Program(s) must meet criteria outlined by the partner Organization. Partner Programs may have slightly different college/university program eligibility requirements. Eligibility for SAHA housing will remain consistent across all programs. Students must adhere to both sets of requirements.

Students receiving housing assistance through this set-aside must meet SAHA eligibility criteria for income levels, background check and lawful residency. Students will follow all other voucher policies including MTW rent calculations (see FY2014-6: HCV Rent Reform), MTW mandatory orientation (see FY2014-2: Early Engagement), MTW alternative payment standard schedules (see FY2019-1: Local

Small Area Fair Market Rent Implementation), and MTW alternative examinations (see FY2019-2: Alternate Recertification Process (PH and HCV)). Students have up to one semester after graduation to secure housing at which point students are no longer eligible for the housing voucher.

In addition, this proposed activity is designed to meet the requirements of 24 CFR 5.612 and Section 211 of the Department of Housing and Urban Development Appropriations Act, 2019, which establish parameters within which Section 8 assistance can be provided to individuals enrolled as students in institutes of higher education. Per those parameters, SAHA will not provide assistance to any student who meets all of the following criteria:

- is under 24 years of age;
- is not a veteran;
- is unmarried;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving assistance under such section 8 as of November 30, 2005;
- is not a youth who left foster care at age 14 or older and is at risk of becoming homeless; and
- is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible, to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f).

For purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.

If a student is determined to be independent from his/her parents, then the income of the student's parents will not be considered in determining the student's eligibility. One way for a student to be determined to be independent is to meet HUD's definition of independent child, which requires the individual to be verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

- a local educational agency homeless liaison
- the director of a program funded under Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director; or
- a financial aid administrator.

Rental leases executed under this program will follow standards as regulated by Section 8(o)(7) of the housing act and 24 CFR 982.308-982.310. While the Organization does not require standard HCV leases, the Organization does ensure leases include language per HUD regulations. The Organization [and its education partner] will work with the landlord to determine if the leases should have a one year or alternative term length to accommodate the school semester time frame. In addition, if SAHA terminates the HAP contract due to program violations the lease will automatically terminate. Upon completion of the program, clients will not be eligible for a traditional Housing Choice voucher. However, SAHA will continue to assess if there is a need for continued assistance and will consider a preference for the HCV wait list.

Impact & Update: This activity is in early implementation. The organization did not meet benchmarks for leasing the available set-aside vouchers; however, benchmarks are set as a maximum and did not reflect the reality that leasing up these set-aside vouchers would take time. In addition, the voucher program is experiencing substantial utilization issues due to factors not limited to this activity.

While the first few semesters were times of adjustment due to COVID and staffing challenges, it is expected that both Opportunity Home and partners can now focus energy on doing the student assessments and delivering the services as outlined in the Logic Models. It is too soon to tell if the program objectives are being met. However, the organization has received promising feedback from students. Students expressed that being in the CHAP program allowed them access to affordable housing and financial freedom to focus on their degree plans. Some students also used this financial freedom to pay down debt.

HUD Standard metrics

HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
made available for	implementation of the activity (number).	units of this type after implementation of the	Actual housing units of this type after implementation of the activity (number).	Benchmarks met.
Palo Alto College	0	up to 20	20	
St. Philips College	0	up to 30	30	

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	prior to	households receiving these services after implementation of	Actual number of households receiving these services after implementation of the activity (number).	Benchmarks not met.
Palo Alto College	0	up to 20	14 student households	
St. Philip's College	0	up to 30	3 student households	

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement Achieved?				

Number of households receiving services aimed to increase housing choice (increase).	prior to implementation of	households receiving these services after implementation of	Actual number of households receiving these services after implementation of the activity (number).	Benchmark not met.
Palo Alto College	0	up to 20	14 student households	
St. Philip's College	0	up to 30	3 student households	

III. Actual Non-Significant Changes: None

- IV. Actual Changes to Metrics/Data Collection: The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).
 - SS #3: Increase in Positive Outcomes in Employment Status (#)
 - SS #3: Increase in Positive Outcomes in Employment Status (%)
 - SS #6: Reducing Per Unit Subsidy Costs for Participating Households

V. Actual Significant Changes: None.

- VI. Challenges in Achieving Benchmarks and Possible Strategies: The organization completed an in-depth internal review of this activity during the fiscal year. Below are some of the results that highlight challenges and possible strategies moving forward:
 - COVID brought a big delay to the implementation of the program. It took partners time to adjust to virtual academic semesters. This subsequently delayed referrals and the delivery of partner services.
 - Staffing shortages posed another significant challenge. The staffing issues were on both sides: SAHA and Partners. This continues to be a challenge and is not limited to this activity or programs.
 - Participant reach and program enrollment:
 - Homeless college students or students at risk of becoming homeless had misconceptions about whether they qualified or not for housing assistance. In the student interviews, most students said that they "did not want to take away the assistance from someone who needed it"
 - Staffing and COVID challenges also impacted how much outreach and enrollment the partners could do.
 - With staff turnover, some process and requirement knowledge was lost and new SAHA and partner staff had to take some time to learn the process and requirements. With staffing becoming more stable, this should be less and less of an issue.
 - Possible strategies for improved activity performance:
 - Coordination and communication strategies including but not limited to re-assigning internal staff to ensure there are dedicated points of contact on both sides of the partnership; offering more eligibility appointments as staffing

- issues are addressed, develop more communication materials to bridge knowledge gaps
- Student outreach strategies including but not limited to reframing "who is eligible for housing assistance" so students can better identify as someone who can benefit from the program; partners consider additional outreach efforts including using new tactics and mediums (ie, flyers at library, hum, child care centers) and targeted outreach to groups who are at higher risk for homelessness (e.g. LGBTQ+)

FY2020-3 - Family Self Sufficiency (FSS) Program Streamlining

I. Plan Year Approved, Implemented, Amended

Plan Year	(Fiscal	Year)
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MTW Statutory Objective(s)	Approved	Implemented	Planned Close out
Reduce cost and increase cost effectiveness	FY2020	FY2020	FY2023

II. Description/Impact/Update

Description: This activity is designed to create operational efficiencies in order to maximize engagement in the FSS program. The Organization has modified the FSS contract to be in alignment with housing program policy in the Housing Choice Voucher Administrative Plan and Public Housing Program Admissions and Occupancy Policy. Currently in the Organization's HCV program, a participant's TTP is calculated per the approved MTW activity, FY2014-6 Rent Simplification. This FSS-related waiver allows the Organization's FSS contracting process to be consistent with current and future PH and HCV alternative rent policies.

Impact & Update: This activity is implemented and ongoing. The organization contracted 172 FSS participants during the fiscal year. The organization will be closing the activity out in the FY2023 MTW Report. In order to keep the flexibility and eliminate unnecessary administrative reporting, the organization will move this waiver to the FY2014-6 HCV Rent Reform since the FSS contract changes are needed as a result of that policy. This change is planned to be proposed in the FY2024 MTW Plan for HUD approval.

HUD Standard metrics

CE #1: Agency Cost Savings				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?
Total cost of task in	Cost of task prior to	Expected cost of task	Actual cost of task	
dollars (decrease).	implementation of the	after implementation	after implementation	
	activity (in dollars).	of the activity (in	of the activity (in	
		dollars).	dollars).	Benchmark met
Fss staff time			CE#2 multiplied by	
multiplied by	CE#2 multiplied by	CE#2 multiplied by	average wage + benefits	

average salary + benefits	average wage + benefits \$1,488.25	average wage + benefits \$360.79	\$360.79	
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III. Actual Non-Significant Changes: None.

- **IV. Actual Changes to Metrics/Data Collection:** The organization has removed the following metrics following HUD's guidance on applicability of standard metrics that states the PHA can determine the best applicable metrics. This activity was never designed to impact the following metrics and was only previously reported per previous HUD requirements with neutral benchmark (no change expected).
 - CE #2: Staff Time Savings
- **V. Actual Significant Changes:** None. The organization intends to move this waiver to FY2014-6 Rent reform pending HUD approval.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: None.

FY2021-1 - Next Step Housing Program (THRU Project)

I. Plan Year Approved, Implemented, Amended Specify the Plan Year the MTW activity was proposed. Specify the Plan Year the MTW activity was implemented. Provide any Plan Years in which the MTW activity was amended.

	Plan Year (Fiscal Year)		Year)
MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2021	FY2021	NA

II. Description/Impact/Update

Description: The housing assistance provided by the Organization is intended to allocate vouchers to youth aging out of foster care who are at risk of homelessness. The voucher provides the youth the ability to lease decent, safe, affordable housing in the private housing market.

Partner Program Overview

THRU Project's Next Step Housing Program is intended to change the way former foster youth are housed in order to reduce rates of homelessness¹. It will offer housing options and mandatory life-skills courses so that 10 vetted youth through non-institutionalized living will be unified with the community. This program will be an integral component for local foster youth, in their journey to productive independence. The program is specifically designed as a graduated, systematic approach geared towards one of our community's most vulnerable populations and creates opportunities for individual growth through skill building, practical life skills, support, and ultimately our most basic need; shelter. Each placement will focus on preparing the youth for living on their own while strengthening future families and breaking the negative cycles.

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¹ Youth may currently be in extended foster care.

The THRU project will provide a range of services, including:

- 1. Housing search assistance
- 2. Life-skills course
- 3. Home visits by case manager
- 4. Access to employment specialist
- 5. Participants are also required to save a percentage of personal income, on a sliding scale, so that at the end of the one year they have at least \$2,500 in savings

Activity Overview

Currently, ten (10) modified project based vouchers have been allocated and committed to Woodhill Apartments to support this partnership as approved under FY2020 amendments to the FY2015-3 Modified Project Based Vouchers activity. To date, there have been no successful placements. After a post-implementation review, the Organization and partner have identified program design changes that require additional MTW waivers.

SAHA is proposing to contribute up to 36 months of housing assistance to support youth being served by the Next Step Housing Program. Below is a summary of how SAHA's housing assistance will provide support.

Year 1 (12 months)

- Youth are enrolled in the Next Step Housing Program and receive housing assistance from SAHA through a modified project based voucher at Woodhill Apartments.
 - Youth will have rent calculated as prescribed in FY2014-6 Rent Reform and will also have their portion capped at \$100 -- SAHA will cover any additional tenant rent portion with increased housing assistance.
 - Youth will have access to the modified project based unit and rent cap for one year only.
 - SAHA will also waive the initial rent burden rule which states that when a family initially leases and the gross rent of the unit exceeds the applicable payment standard for the family, the dwelling unit rent must not exceed 40 percent of the family's adjusted income.

Years 2 and 3 (24 months)

- Once youth complete the first year (12 months) Next Step Housing Program, they will have the
 option of continuing on housing assistance with a traditional tenant based voucher provided by
 SAHA.
 - Youth must be recommended by the partner for continuance in the voucher program
 - Youth will have access to the tenant-based voucher for an additional 24 months and will benefit from the choice to remain at Woodhill Apartments or move to another housing unit within SAHA's jurisdiction.
 - Youth will have their tenant rent portion calculated as prescribed in FY2014-6: HCV Rent Reform (consolidates previously approved activities FY2014-6: Rent Simplification (HCV) and FY2015-4: Simplified Utility Allowance Schedule) and will NOT have their portion capped at \$100.

Alignment with other MTW activities

• Due to the nature of the program, youth will have an annual recertification every 12 months and will not follow alternative recertification processes established under FY2019-2: Alternate Recertification Process (PH and HCV).

• Youth admitted under this activity will follow the Organization's alternative implementation of small area fair market rents as established under FY2019-1: Local Small Area Fair Market Rent (SAFMR) Implementation.

Impact & Update: This activity is implemented but behind schedule. At the end of FY2022, the organization had four youth housed through this small program.

HUD Standard metrics

HC #1: Additional Ur	HC #1: Additional Units of Housing Made Available				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	type prior to implementation of the	units of this type after implementation of the	1	Benchmark met.	
	0	Year 1: 10 PBVs Year 2: up to 20 (10 PBVs 10 TBVs) Year 3 and beyond: up to 30 (10 PBS, 20 TBVs)	10 PBVs committed		

HC #7: Households Assisted by Services that Increase Housing Choice					
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	households receiving these services after implementation of	Actual number of households receiving these services after implementation of the activity (number).		
	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30	4		

SS #5: Households Assisted by Services that Increase Self Sufficiency				
Unit of Baseline Benchmark Outcome Benchmark				
Measurement Achieved?				

Number of households receiving services aimed to increase housing choice (increase).	prior to	households receiving these services after implementation of	Actual number of households receiving these services after implementation of the activity (number).	Benchmark not met
	0	Year 1: 10 youth Year 2: up to 20 Year 3 and beyond: up to 30	4	

III. Actual Non-Significant Changes: None.

- **IV. Actual Changes to Metrics/Data Collection:** Due to the delay in leasing up the committed PBVs, the benchmarks for the second year of implementation (FY2022) have been reset using year 1 benchmarks. The first set of youth will be entering into their second year of housing in FY2023.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: This program is small and operated in partnership with a small local non-profit organization. A number of challenges have impacted this activity including: youth not liking the current property where PBVs are committed and long commutes between the property and their college. These challenges coupled with the ongoing impacts of the pandemic (ie, staffing, low utilization, unprecedented rental market conditions) have resulted in low enrollment. The organization of the preparation of this report is completing an in depth review of this activity to identify possible solutions.

FY2021-2 - Limiting increases in rents

I. Plan Year Approved, Implemented, Amended Specify the Plan Year the MTW activity was proposed. Specify the Plan Year the MTW activity was implemented. Provide any Plan Years in which the MTW activity was amended.

	Plan Year (Fiscal Year)		
MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2021	February 2022	FY2022

II. Description/Impact/Update

Description: The local rental market has seen unprecedented impacts from the ongoing pandemic. The original intent of the activity was to temporarily cap rental rate increases at 3% and then sunset after 24 months, or sooner, if the national funding situation improved, and the Organization was able to meet MTW requirements of serving substantially the same number of households.

In FY2022 the organization reviewed this activity and determined that an increase from 3% to 5% would balance out the priority to protect clients from large rent increases with the need to support voucher holders in being competitive tenants in the rental market. In addition, the organization added a limit to the number of rental increase requests to one per year. Both were approved in the FY2022 MTW Plan.

Impact & Update: The organization increased the rental increase cap from 3% to 5% in February 2022. Effective June 1, 2022, the cap has been removed. The limit to the number of rental increases remains in place. Based on feedback from landlords and monitoring the local rental market, the organization believes the removal of the cap will allow tenants to be more competitive in the market. Overall, based on metrics and feedback from landlords and tenants the organization believes the temporary cap achieved its intended impact of protecting residents during the first year of the pandemic when we were faced with unprecedented challenges. After more time of implementation, the organization will review the impact of the limit in the number of rental increases to ensure it is having the intended impact.

HUD Standard metrics

HC #4: Displacemen	HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?	
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	losing assistance/moving	Benchmark met	
# of households that experience a rent increase above the cap	230	230	479 (281 under the 3% cap and 198 under the 5% cap)		

Opportunity Home metrics

Metric Name					
Unit of	Baseline	Benchmark	Outcome	Benchmark	
Measurement				Achieved?	
Average rent increase	Average rent increase	Average rent increase	Average rent increase	Benchmark met	
	without the cap	with the cap.	with the cap.		
	\$70.16 average	\$26.30 average	\$27.10 average		
	requested increase	accepted rent	accepted rent		
		increase	increase		

- **III. Actual Non-Significant Changes**: As of June 2022, the rent increase cap has been removed.
- IV. Actual Changes to Metrics/Data Collection: None.
- V. Actual Significant Changes: Per the FY2022 MTW Plan Amendment, the rent increase cap was increased to 5% in February 2022 and a limit of one per year on the number of rental increases was implemented.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: The main challenge for this activity has been related to data management. Because the policy change was temporary and changed in a short period of time, the organization had to quickly deploy data tools for staff that may not have produced the most high quality data. The operations support data team is exploring ways to mitigate these challenges in the future.

FY2022-1 - SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions

I. Plan Year Approved, Implemented, Amended Specify the Plan Year the MTW activity was proposed. Specify the Plan Year the MTW activity was implemented. Provide any Plan Years in which the MTW activity was amended.

Plan Year (Fiscal Year)

MTW Statutory Objective(s)	Approved	Implemented	Amended
Increase Housing Choices	FY2022	FY2022	NA

II. Description/Impact/Update

Description: This activity establishes an alternative policy that excludes contributions in the household's annual income calculation. Specifically, contributions received directly by the household from an Opportunity Home partner or contributions distributed to a household on behalf of an Opportunity Home partner will not be included in the households annual income for purposes of calculating rent.

Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by Opportunity Home partners. Examples include: (i) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (ii) cash or other liquid assets, and (iii) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with Opportunity Home.

Impact & Update: This activity is implemented, ongoing, and on schedule. The organization was able to hit the expected benchmark for leveraged funds but came in slightly under the households reach targets in the first year of implementation. As the organization continues to engage in new partnerships, additional contributions and services will be added to the metric tracking.

HUD Standard metrics

HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of	Baseline	Benchmark	Outcome	Benchmark
Measurement				Achieved?
Number of	Households receiving	Expected number of	Actual number of	
households receiving	this type of service	households receiving	households receiving	
services aimed to	prior to	these services after	these services after	
increase housing	implementation of the	implementation of the	implementation of the	
choice (increase).	activity (number).	activity (number).	activity (number).	
Number of		Estimated 1,500		
households receiving		served monthly or		Benchmark met
contributions from a		18,000 served		Deficilitiate filet
SAHA partner		annually for food		
	0	assistance (this may	11,620	
		include one		
		household being		
		served multiple		
		months)		

CE #4: Increase in R	CE #4: Increase in Resources Leveraged					
Unit of	Baseline	Benchmark	Outcome	Benchmark		
Measurement				Achieved?		
Amount of funds	Amount leveraged	Expected amount	Actual amount			
leveraged in dollars	prior to	leveraged after	leveraged after			
(increase).	implementation of the	implementation of the	implementation of the			
	activity (in dollars).	activity (in dollars).	activity (in dollars).			
Total amount leveraged from SAHA partners for SAHA clients across cash and non-cash contributions	0	Estimated \$700,000 leveraged annually for food assistance	ne anetaigae hooti			

- III. Actual Non-Significant Changes: None.
- **IV. Actual Changes to Metrics/Data Collection:** None. The organization will update metrics including benchmarks when new partnerships are established.
- V. Actual Significant Changes: None.
- VI. Challenges in Achieving Benchmarks and Possible Strategies: The organization was initially challenged during the early implementation of this activity regarding ensuring we have a formal process in place for not only entering into new partnerships, establishing data sharing agreements, as well as communicating to staff, and setting up internal controls to ensure residents are receiving the exclusion. These challenges are currently being addressed through process mapping and new standard procedures.

A. NOT YET IMPLEMENTED ACTIVITIES

Not Yet Implemented Activities: MTW activities in which the MTW PHA is not actively engaged but is preparing to implement in the future.

Not Applicable

B. ACTIVITIES ON HOLD

On Hold Activities: MTW activities that were previously implemented, that the MTW PHA stopped implementing, but that the MTW PHA plans to reactivate in the future.

Not Applicable

C. CLOSED OUT ACTIVITIES

Closed Out Activities: MTW activities that

- Were MTW activities, but are now obsolete because they no longer require MTW flexibility due to changes in regulation:
- Were completed because the MTW PHA accomplished its stated objectives and no longer requires the use of MTW flexibility;
- The MTW PHA has decided to end before attaining the activity's objectives; or
- The MTW PHA has never implemented and does not plan to implement at any point in the future.
- In the year the activity is ended the MTW PHA is required to provide information about the outcomes of the activity.

The organization is closing out two activities. FY202-4 was never implemented and FY2015-1 was a HUD supported study that has ended.

FY2020-4: Time-Limited Workforce Housing Pilot Program (PBV)

I. Plan Year Approved, Implemented, Closed Out

MTW Statutory Objective(s)	Approved	Implemented	Closed
Promote Self-Sufficiency	FY2020	NA	FY2022

II. Explain why the MTW activity was closed out

The activity was dependent on a new construction deal that did not come to fruition.

III. In the Plan Year that the MTW activity is closed out, provide the following:

- Discussion of the final outcome and lessons learned: None.
- Description of any statutory exceptions outside of the current MTW flexibilities that might have provided additional benefit to the MTW activity (if applicable): Not applicable.
- Summary table listing outcomes from each year the MTW activity was implemented (if applicable): Not applicable.

FY2015-1 - MDRC / HUD Rent Reform Study

IV. Plan Year Approved, Implemented, Closed Out

Plan Year (Fiscal Year)

			/
MTW Statutory Objective(s)	Approved	Implemented	Closed
Increase housing choices, reduce cost and	FY2015	March 2015	FY2022
increase cost effectiveness, and promote			
self-sufficiency.			

V. Explain why the MTW activity was closed out

The San Antonio Housing Authority (SAHA) (now Opportunity Home San Antonio) was selected to participate in a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to evaluate a Housing Choice Voucher (HCV) alternative rent reform policy (the "Study"). MDRC, a nonprofit and nonpartisan education and social policy research organization, conducted the Study on behalf of HUD. The study was originally scheduled to end in 2018, but was extended until FY2021 to ensure researchers are able to gather information from two triennial recertification periods. The agreement with the researchers ended in December 2021 and the last recertification was completed in March 2022. All MDRC participants are being transitioned to the rent structure as approved under FY2014-6.

VI. In the Plan Year that the MTW activity is closed out, provide the following:

- Discussion of the final outcome and lessons learned: The final outcomes and lessons learned from the study are well documented by the research partner, MDRC (see MDRC's Rent Reform web page for reports and overviews²). The study presented several opportunities for learning within the organization and are summarized below:
 - culture: fostering a learning culture and increasing adaptability within operational areas and
 - collaboration: learning how to bring in our organization's expertise while also leveraging the expertise of the researchers and evaluators to improve the services and affordable housing we provide to our community
 - project management: participating in a study like this one requires more internal project management that anticipated
 - data: the evaluation hinges on the ability to collect high quality data; participating in the study reinforced the organization's priorities regarding data integrity within operational areas.

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² https://www.mdrc.org/project/rent-reform-demonstration#overview

- Description of any statutory exceptions outside of the current MTW flexibilities that might have provided additional benefit to the MTW activity (if applicable): Not applicable.
- Summary table listing outcomes from each year the MTW activity was implemented (if applicable)

HUD Standard metrics

Metric	Baseline	Target	FY16	FY17	FY18	FY19	FY20	FY21
	FY2016:	FY2016:						
	\$13,649	\$6,413						
	FY2017:	FY2017: \$0						
CE#1: Cost per	\$15,084	FY2017. \$0						
annual	FY2018:	\$648	\$6,413	\$0	\$648	\$5,866	\$0	\$1,915
certification	\$16,539	ψ040						
		FY2019:						
	FY2019:	\$5,866						
	\$16,539							
	FY2016:							
	\$6,907							
CE#4. C+	FY2017:							
CE#1: Cost per	\$7,633							
interim	FY2018:		\$0	\$1,436	\$2,041	\$899	\$1,346	\$1,512
certification	\$8,369	\$3,786						
	FY2019:							
	\$4,521							
	FY2016:							
	\$5,427							
	FY2017:							
CE#1: Cost of	\$8,492		40.400	44.000	40.470	\$0.744	4004	44.670
rent calculation	FY2018:		\$2,138	\$1,626	\$3,179	\$2,711	\$921	\$1,673
	\$10,121	\$1,397						
	E) (0010	E) (0010						
	FY2019:							
	\$10,121							
CE#1: Cost to	FY2016:\$21							
determine	FY2017:\$23		40	٠,	\$8	\$8	\$8	\$8
income from	FY2018:\$25	FY2018: \$3	\$0	\$8	фо	ФО	ФФ) \$0
assets	EV2010, ¢2E	EV2010, ¢2						
	FY2019: \$25							
	FY2016:\$2,9	FY2016:\$1,3						
	52.50 FY2017:\$2,9							
CE#1: Cost to	52.50							
determine utility	52.50 FY2018:\$2,9		\$5,427	\$4,127	\$8,070	\$6,525	\$2,338	\$4,246
allowance	52.50		Ψυ, τ2/	Ψ-,12/	ΨΟ, Θ7 Θ	Ψ0,523	Ψ2,550	\$7,270
allowance	52.50	FY2019:						
	FY2019:							
	\$10,121							
		FY2016 :304						
	hours							
CE#2: Time to	FY2017: 647							_
complete annual		FY2018 209	304	0	25	229	0	75
certification	12010.047	12010 207						
	FY2019: 647	FY2019: 304						
	12017.047	1 12017, 304						

CE#2: TIme to	FY2016: 257 FY2017: 364	FY2017: 70						
determine tenant	FY2017: 396	FY2018: 124	101	70	124	100	36	65
rent		FY2019: 156						
	FY2016: 257	FY2016: 257						
CE#2: Time to		FY2017 :177						
determine utility	FY2017: 396		257	177	315	255	91	166
allowance								
	FY2019: 396	FY2019: 396						
	FY2016: 1	FY2016: 0.13						
CE#2: Time to	hours	hours						
determine	FY2017: 1	FY2017: 0.13						
income from	FY2018: 1	FY2018:	0.00	0.33	0.33	0.33	.33	.33
assets	1 12010. 1	0.13						
assets	FY2019: 1	FY2019: .13						
CE#3: Average								
Error rate in	18%	15%	ND	1%	1%	1%	0%	n/a
determining TTP								
CE#3: Average								
error rate in				00/	00/	00/		,
determining	2%	2%	ND	0%	0%	0%	0%	n/a
utility allowance								
SS#1: Average								
Earned Income of	\$7,704.87	\$7,704.87	ND	\$7,705	\$8,307	\$10,615	\$10,081	\$9,369
Study Group								
SS#3: Head of								
Households								
employed	211 or 26%	211 or 26%	ND	26%	26%	36%	36%	33%
full-time								
SS#3: Head of								
Households								
employed	160 or 20%	160 or 20%	ND	20%	20%	20%	20%	20%
part-time								
SS#3: Head of								
Households								
enrolled in	TBD	TBD	ND	ND	ND	ND	ND	ND
education								
program								
SS#3: Head of								
Households	TBD	TBD	ND	ND	ND	ND	ND	ND
enrolled in	180	IBD	שויו	שאו	שויו	שוו	שויו	שויו
training program								
SS#3: Head of								
Households	241 or 30%	241 or 30%	ND	30%	31%	26%	25%	27%
unemployed								
SS#3: Head of								
Households	558 or 70%	558 or 70%	NF	70%	70%	74%	75%	73%
Other	300 01 7 0 70	300 01 7 0 70		7 0 70	, , , ,	, , , ,		, , ,
SS#4: Study								
· ·	17	17	ND	17	9	3	3	3
Group								

Households								
receiving TANF								
benefits*								
SS#5: Study								
Group								
households	4.5	45	ND	15	19	16		10
receiving	15	15	טויו	13	19	10		13
self-sufficiency								
services								
SS#6: Average								
HCV subsidy for	\$637.59	\$637.59	ND	\$638	\$655	\$670	\$710	\$712.37
Study Group								
SS#7: Total HCV								
tenant share for	\$234.08	\$234.08	ND	\$234	\$255	\$290	\$279	\$284.82
study group								
SS#8:								
Transitioned to	0	0	ND	3	0	7	4	0
Self-Sufficiency*								
HC#5: Study								
Group								
Households able								
to move to a	0	0	ND	ND	ND	ND	ND	ND
better unit								
and/or								
neighborhood*								

V. PLANNED APPLICATION OF MTW FUNDS

A. FINANCIAL REPORTING

i. Available MTW Funds in the Plan Year

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

As a block grant organization, Opportunity Home combines PH, HCV, and Capital Fund Program (CFP) funds into a single fund with full funding flexibility.

Sources of MTW Funds include the following:

- HCV Block Grant funding from HUD
- PH Operating Subsidy from HUD
- PH Rental and Other Income represents amounts collected from residents of our PH communities for rents and other miscellaneous charges
- PH CFP (including DDTF) Grants from HUD

ii. Expenditures of MTW Funds in the Plan Year

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

Other than traditional uses for the MTW programs, consistent with the MTW plan, funds were obligated and expended to provide funding for the following:

Projects	Cumulative Expenditure Balance as of 6/30/2022		
Program Administration and Implementation of MTW	\$	1,835,785	
Initiatives			
Public Housing Operating Shortfall		2,499,249	
Capital Planning		476,840	
Expansion of Public Housing WIFI		1,448,648	
Highland Park Property Support		1,000,000	
Preservation and Expansion of Affordable and Public			
Housing:			
East Meadows Development		4	
Development of Labor Street Multifamily Property	,	591,183	
Alazan Courts Predevelopment Costs		60,112	
Total	\$	7,911,821	

iii. Describe Application of MTW Funding Flexibility

The MTW PHA shall provide a thorough narrative of actual activities that use only the MTW funding flexibility. Where possible, the MTW PHA may provide metrics to track the outcomes of these programs and/or activities. Activities that use other MTW authorizations in Attachment C and/or D of the Standard MTW Agreement (or analogous section in a successor MTW Agreement) do not need to be described

here, as they are already found in Section (IV) of the Annual MTW Report. The MTW PHA shall also provide a thorough description of how it used MTW funding flexibility to direct funding towards specific housing and/or service programs and/or other MTW activity, as included in an approved MTW Plan.

APPLICATION OF "MTW FUNDING" FLEXIBILITY

The Organization uses Moving to Work funds to support the Community Development Initiatives Department for MTW program administration and implementation. These funds allow the Organization to provide higher quality supportive services to residents than would otherwise be permitted by grant funding alone. In addition, the Organization can more effectively engage with partners and leverage resources for the benefit of the residents.

Below are specific program uses of the Moving to Work funds that are not covered by other authorizations reported in different sections of this report.

MTW047 - Alazan Courts Predevelopment Costs: MTW funds were used to begin the master planning process for the redevelopment of the Alazan Courts including a commitment to being responsive to the needs of the residents, neighborhood and surrounding community including building higher quality housing.

MTW042 - 100 Labor Multi Family Development: MTW funds were used towards the construction of the 100 Labor Multifamily Redevelopment Project.

MTW043 - Rosemont at Highland Park: MTW funds were used to cover operating expenses of the Rosemont at Highland Park project.

MTW045 - Expansion of PH Wifi: As part of the Opportunity Home Road to Digital Inclusion initiative, these MTW funds will be used to narrow the digital divide and bring much needed Internet connectivity and accessibility to the Public Housing portfolio. This includes funding bandwidth, WI-FI management, installation, labor and support of the expanded network.

Education Partnerships: Opportunity Home education-related programming is significant and diverse and includes:

- REACH Awards: Recognizes and rewards students annually for academic achievement.
- College Scholarship Program: Funds scholarships for students annually to provide much-needed support to ensure a higher educational achievement.
- ConnectHomeSA: Provides digital inclusion programming, including digital literacy training and computing devices, to Public Housing residents and Housing Choice Voucher participants.

Resident Work Apprenticeship Program: The Resident Ambassador Program provides meaningful work experience for residents. Opportunity Home has found that this program is an effective strategy to engage residents in educational, training, workforce development, and other self-sufficiency programs.

Health and Wellness: Opportunity Home sponsors a variety of events to promote health and wellness, including:

• Food Distributions: Serves as a proxy for the San Antonio Food Bank and the City of San Antonio in distributing meals to elderly and disabled residents in Public Housing weekly.

Community Building:

- Annual Father's Day Initiative: Engages families in positive family activities and recognizes fathers' contributions through the "El Hombre Noble" awards, resource fairs and clothing distribution.
- Mother's Day Celebration: Celebrating the strength and resilience of our mothers with an array of festivities, including brunch, games, prizes, and educational materials provided by community vendors.
- Holiday Gift Drive and Distribution: Solicited and received gift donations and distributed the gifts to families with children and elderly/disabled residents living in Public Housing.

Summary of CDI Accomplishments from July 1, 2021 to June 30, 2022

Objective	Target	Accomplishment	Status
Improve quality	Host 375 events/activities with	CDI hosted and assisted 718 events with	nExceeded target
of life of	4,500 participants.	8,835 resident participants	
residents	Maintain 30 resident councils	3 active resident councils.	Below Target
			due to COVID-19
Provide access	8,250 individuals served;	466 food distribution events with 12,671	Exceeded target
to resources	\$325,000.00 assistance value	total individuals served with an in-kind	
and non -	quarterly.	value of \$675,470.76.	
Opportunity	750 referrals made quarterly	8,940 ROSS, FSS, and JP referrals for	Exceeded target
Home programs	Sthrough Resident Opportunities	service made, averaging 2,235 referrals	
	& Self-Sufficiency (ROSS),	per quarter	
	Family Self-Sufficiency (FSS)		
	program, and Jobs Plus (JP).		
Improve	1,200 FSS participants	1,133 FSS participants enrolled during	Below target
resident	enrolled annually	the fiscal year.	
capacity	1 resident council training	1 resident council trainings offered this	
	offered quarterly	fiscal year	Due to COVID-19
	3 Early Engagement Program	0 - currently in the process of	Program on Hold
	sessions with 500 total Public	redesigning EEP.	
	Housing (PH) and Housing		
	Choice Voucher (HCV)		
	participants each quarter		
	50 new PH and HCV	1710 Class Hours, 163 CHSA Program	Exceeded
	participants to receive	Enrollments, 114 Awarded Devices, 72	
	Computer Training, Device	EBB/ACP Enrollments.	
	and Connectivity quarterly		
Facilitate	_	432 ROSS, FSS, and JP residents	Ongoing
residents		enrolled in training or education	
achieving	_	16 ROSS, FSS, and JP residents	Ongoing
self-sufficiency		obtained a certification and earned	
		their high school diploma or GED 4	
	_	656 ROSS, FSS, and JP assessments	Ongoing
		completed and 228 ROSS/JP/FSS	
		service plans created.	
	_	1279 bundles of school supplies and	Ongoing

	books were distributed with an i value of \$38, 370.00	n-kind
	29 Resident Scholarships award totaling \$43,500.00. 5 Joshua Longoria Memorial Scholarships awarded totaling \$2,500.00. 61 REACH awards for various am totaling \$1,620.00.	ŭ ŭ
COVID-19	- Delivered commodities door-to-	door -
Response	when COSA COVID case reports a level "high."	were at

CDI HOSTED EVENTS:

Between July 1, 2021 and June 30, 2022, the CDI department hosted 427 events/activities and assisted 291 partner-hosted events, for a total of 718 events with 8,835 resident participants.

CDI Hosted and Assisted Events from July 1, 2021 to June 30, 2022

Event Type	PH/HCV Family Events	Elderly/Disabled Events	Total Events
Education	3	0	3
Nutrition	115	6	121
Arts	3	0	3
Employment	5	0	5
Recruitment	19	0	19
Training	3	0	3
Parenting	4	0	4
Leadership	0	0	0
Community Building	114	41	155
Financial Literacy	45	0	45
Digital Literacy	22	0	22
Youth Services	30	0	30
Other/Admin	23	106	129
Health	85	94	179
Tot	tal 471	247	718

FOOD DISTRIBUTIONS:

Food Distributions from July 1, 2021 to June 30, 2022

Program Served	Distribution	# Events	# Units Served	In-Kind Amount
Eldery/Disabled	HOPE Commodities	192	4807	\$381,505.83
Services (EDS)	Commodity Supp. Food Program (CSFP)	192	4873	\$139,172.88
	Retail Bread Pantry	0	0	\$0

Total		466	12,671	\$675,470.76
EDS & Family Total		3	307*	\$15,040
EDS & Family	PH/HCV Distributions	3	307	\$15,040
EDS Only Total		463	12,364*	\$660,430.76
	Other distributions	19	661	\$2,909.00
	SAFB Emergency Boxes	0	0	\$0
	COSA Nutrition Program	48	1926	\$135,933.05
	Meals on Wheels	12	97	\$910.00

^{*#} Units Served does not represent the number of unique households served as units were served to many of the same households during separate food distribution events.

A. LOCAL ASSET MANAGEMENT PLAN

changes in the Plan Year.

No

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

i.	Did t	the MTW PHA allocate costs within statute in the Plan Year?
		Yes
ii.	. Did 1	the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?
ii.	. Did 1	the MTW PHA implement a local asset management plan (LAMP) in the Plan Year? No

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

Not applicable

VI. ADMINISTRATIVE

A. Reviews, Audits and Inspections

General description of any HUD reviews, audits or physical inspection issues that require the agency to take action to address the issue.

Opportunity Home had a total of 511 EHS (Exigent Health and Safety) issues that required action. The majority of EHS issues were related to missing or non-functioning smoke detectors or blocked egress. All were abated by the organization within 24 hours.

There were no other HUD reviews, audits or physical inspection issues that required the organization to take action to address the issue.

B. Evaluation Results

Results of latest PHA-directed evaluations of the demonstration.

Opportunity Home is not currently engaged in any organization-wide evaluations of its MTW program. FY2015-1: MDRC / HUD Rent Study is closed out. There were no further PHA-directed evaluations during FY22.

C. MTW Statutory Requirement Certification

Certification that the PHA has met the three statutory requirements in the Plan Year of: (1) ensuring that at least 75% of households assisted by the MTW PHA are very low-income, (2) continuing to assist substantially the same total number of households as would have been assisted had the MTW PHA not participated in the MTW demonstration, and (3) maintaining a comparable mix of households (by family size) served as would have been served had the MTW PHA not participated in the MTW demonstration.

See the following page.

D. MTW Energy Performance Contract (EPC) Flexibility Data

Not Applicable

Certification of MTW Statutory Compliance

Opportunity Home San Antonio hereby certifies that it (the Organization) has substantially met the three statutory requirements of:

1) Assuring that at least 75 percent of the families assisted by the Organization are very **low-income families:** At fiscal year-end, 15,692 households out of a total of 16,186 (97%) households were very low-income (<50% AMI).

	Total Households	Number below 50% AMI	% Below 50% AMI
PH at FYE	5530	5,451	99%
Vouchers at FYE	10,461	10,204	98%
Local, Non-Traditional (LNT) at admissions	195	37	19%
Total	16,186	15,692	97%

2) Continuing to assist substantially the same total number of eligible low- income families as would have been served had the amounts not been combined: The Organization's FY2022 MTW families served (annual average) is 16,932 out of 18,100 MTW adjusted baseline denominator (94%). Per PIH 2013-2, the organization is Substantially Compliant – Plan in Place/Plan in Progress.

	MTW Baseline	FY2022 Average	MTW Baseline Compliance Calculation
PH	5,749	5,570	97%
Vouchers	12,351	10,914	88%
Other (LNT)		448	
Total	18,100	16,932	94%

3) Maintaining a comparable mix of families (by family size) served, as would have been provided had the amounts not been used under the demonstration: The Organization continues to serve a comparable mix of households by household size.

Mix of Family Sizes	MTW Baseline	FY2022	Absolute Change	Percent Change
Served		Percentage (FYE)		
1-person	36%	39%	3%	10%
2-person	16%	19%	3%	16%
3-person	18%	16%	-2%	-13%
4-person	15%	13%	-2%	-16%
5-person	9%	8%	-1%	-14%
6-person+	7%	6%	-1%	-17%

Ed Hinojosa Jr.

Ed Hinojosa, Jr. President & CEO

9/27/2022

Date