



HOUSINGAUTHORITY

SANTA CLARA COUNTY

making homes, growing communities

FY2024 Moving to Work Annual Plan

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

Submitted April 13, 2023

FY2024 Moving to Work Annual Plan

SANTA CLARA COUNTY HOUSING AUTHORITY (SCCHA)

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

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

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

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I. Introduction

Letter from the Executive Director, Preston Prince

Looking ahead to Fiscal Year 2024, The Housing Authority continues to put residents at the center of planning. The Santa Clara County Housing Authority (SCCHA) serves more than 20,000 low-income individuals and families throughout Silicon Valley and this Plan prioritizes improving the lives of our residents and the greater community.

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

The Housing Authority was awarded 1,022 Emergency Housing Vouchers (EHV) from HUD in 2021. In close collaboration with Santa Clara County's Continuum of Care, these vouchers have housed 600 homeless families. The remaining 422 families are either housed or working with case managers to find housing. Santa Clara County's perpetually low vacancy rate puts voucher holders in competition with market rate renters, rendering housing hard to find, even with the housing search assistance provided through the EHV funding. The dedicated efforts of our partners are bearing fruit as we watch more families finally locate housing.

The State of California's Homekey program has provided vital funding to the County. SCCHA is an active developer on a large Homekey project, Pavilion Inn, which, when paired with MTW funds, will allow SCCHA to provide housing for 43 transitional aged youth and their families. Twenty-one of those units will have PBVs attached .

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



Bracher Gardens Apartments

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

SCCHA is continuing improvement to the Moving to Work Plan process intentionally focusing on collaboration and inclusivity in planning and a purpose-driven approach to activity development. This Plan reflects the work that has gone into the process with eight new activities and one re-proposal.

Vision and Goals

The FY2020-FY2025 Strategic Plan was approved by the Board of Commissioners and adopted August 1, 2019. Every six months, SCCHA reports to its Board the progress on the action items and objectives developed from the Agency’s Strategic Plan Goals. These updates encourage the agency to re-prioritize or revise the objectives of the Plan as necessary and provide a status report to both internal and external stakeholders on how SCCHA’s initiatives align with the Strategic Plan. SCCHA’s future actions will be carefully examined through the lens of diversity, equity, and inclusion. These principles will be at the forefront of the agency’s thought processes, and will guide the formulation of procedures, policies, and both internal and external engagement.

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

Housing Availability & Affordability

Goal 1. Increase the number of and equitable access to housing opportunities for low-income Santa Clara County residents

SCCHA’s permanently open interest list for Housing Choice Vouchers (HCV), Project Based Vouchers (PBV), and Mod Rehab units launched in December 2020. Thus far SCCHA has drawn 824 people for vacant and new PBV units

As vacancy rates remain very low in Santa Clara County, SCCHA continues to monitor the housing success rates for families shopping with Housing Choice Vouchers and support them through housing search assistance if they are unable to find a new home within the first 120 days of their shopping voucher.

Goal 2. Preserve the existing housing opportunities available to low-income Santa Clara County residents to counter displacement of those who are most impacted by Santa Clara County’s income disparity and housing crisis

SCCHA has taken an active role in the State of California’s Homekey Program. The Homekey Program provides funding to local public agencies to purchase hotels and motels for conversion to affordable housing serving persons experiencing homelessness or at risk of homelessness. SCCHA is currently planning for rehabilitation of the Pavilion Inn (61 units). The SureStay Hotel was originally purchased by the City of San Jose through Homekey and came under SCCHA’s ownership recently. MTW funds will be used for predevelopment and due diligence activities. The Homekey Program covers approximately two-thirds of the acquisition and capital expenses, with local public agencies providing a match. SCCHA is very excited about this opportunity and looks forward to reporting more on its successes in the coming years.

Partnerships

Goal 3. Build strong partnerships that promote better outcomes for those in need of maintaining, affording or securing housing

Santa Clara County has a well-publicized affordable housing crisis. The community’s recognition of the need for more affordable housing was demonstrated by the overwhelming voter approval of \$950 million in Measure A bond funds for affordable housing development, \$700 million of which is directed to extremely low-income households and permanent supportive housing.

Partnering with the development community by attaching PBVs to projects receiving Measure A development funds ensures that units will be affordable for the County’s vulnerable populations, and that new construction properties will have sufficient long-lasting operating revenue. By the end of FY2023, SCCHA will have awarded or conditionally awarded 1,373 Moving-to-Work PBVs and 236 HUD-VASH PBVs (in conjunction with the Veterans Affairs Palo Alto Health Care System) to Measure A projects. Some of the Measure A projects completing construction by the end of FY2023 are Vela Apartments (29 PBVs for chronically homeless families), Page Street Apartments (27 PBVs for chronically homeless families), Villas at Fourth Street (97 PBVs for chronically homeless families), Mesa Terrace (23 PBVs for Transition Aged Youth), and Immanuel Sobrato (97 PBVs for chronically homeless families). Several more projects are expected to complete construction throughout FY2024.

Operational Excellence

Goal 4. Maximize agency fiscal health, efficiency and effectiveness by streamlining processes, adopting technology and embracing innovation

As the Housing Authority, the County, and the broader community adopt a new normal SCCHA intends to keep moving the needle on the technology that makes our jobs easier. There is a planned software conversion in FY2024 that will streamline staff processes and make it easier for residents to get quick answers to their questions.

SCCHA is pursuing strategies within FY2024 and beyond that will set the foundation for the Agency to fulfill its MTW and non-MTW long-term goals.

Department Updates

Housing Programs

- Collaborated with all staff to redesign the HCV department with an intense focus on customer service
- Issued 924 Emergency Housing Vouchers
- Leased up hundreds of new Project-Based Voucher units.

Human Resources

- Expanded teleworking for all employees
- Communicated all COVID-related policy and process changes to staff
- Designing a training and coaching program for supervisors

Procurement

- Audited existing procurement files
- Working to update policies and procedures
- Moved the department toward paperless filing

Information Technology & Facilities

- Designed and implanted an Agency-wide intranet
- Created a digital floor map with employee photos
- Implemented an emergency notification system

Finance

- Continued the record of on-time reporting

- Helping align the budget process to Agency strategy and goals
- Will work with other departments to support the software conversion

Innovation & Impact

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

Real Estate – Asset Management

- Upgrading the 20 units at San Pedro Gardens
- Renegotiated ground lease at DeRose Gardens
- Provided over 900 goodie bags to SCCHA-owned communities for National Night Out

Real Estate - Development

- Approximately \$42 million in MTW funds were used to purchase land for the developments below. Development and financing efforts are ongoing at all these sites.
 - Bellarmino Place Family Housing (115 units)
 - Alvarado Park Senior Housing (89 units)
 - Pavilion – Project Homekey (41 units for transition aged youth)
 - Surestay – Project Homekey project, originally proposed by the City of San Jose, purchased by SCCHA in FY2023. This project includes the eventual purchase of two adjacent sites, an EZ-8 Motel, and a Denny’s restaurant.
 - East Santa Clara site will be the home to the following 4 affordable housing developments.
 - Hawthorn Apartments (107 units)
 - Trillium Apartments (94 units)
 - Sage Apartments (135 units)
 - Elderberry Apartments (135 units)
 -

PBV Pipeline

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

This group of projects also includes those awarded PBVs through SCCHA’s 2020 RFP, which was directed at 2-and 3-bedroom units to increase much needed affordable housing for low-income families in our County. SCCHA’s PBV pipeline will increase the local affordable housing stock by 2,352 units, 649 of those supported by PBVs, once all units are constructed.

In FY2024 SCCHA plans to work with local developers in strategizing future PBV awards.

New Proposed Activities for FY2024

In FY2024 and beyond SCCHA intends to more closely align the MTW Plan with the strategic goals of the agency. Serving residents and prioritizing the needs of the local community will be the guiding focus of the proposed initiatives.

SCCHA is proposing eight new activities and one re-proposal, details of which are found in Section III of this plan. Staff identified focus areas to address the most pressing needs of the community. The focus areas, and descriptions, are listed below with the names of the proposed activities. Some of the initiatives fall into more than one category but for the sake of simplicity they're limited to one of the focus areas.

Social Justice

Initiatives will focus on promoting equity and inclusion amongst all populations served by SCCHA.

- 2024-01: Digital Inclusion
- 2024-03: Short Term Bridge Loan

Education

Initiatives will focus on academic achievement of Santa Clara County children and families.

- 2024-02: Rental Assistance for Student Parents Obtaining Post-Secondary Education

Health & Wellness

Initiatives will focus on establishing partnerships with agencies and non-profits in the health space to improve health related outcomes.

- 2020-2: Interim Housing (re-proposal)

Economic Mobility

Initiatives will focus on developing programs that improve outcomes for working families.

Increasing Capacity

Initiatives will focus on agency efficiencies, in support of resident focused areas.

- 2024-04: Streamline Offer of New Lease Process
- 2024-05: Buena Vista Mobile Home Park

Full details of the proposed activities can be found in Section III of this MTW Plan.

Overview of SCCHA’s MTW Activities

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

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

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

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

* Activities Not Yet Implemented

** Activities on Hold

II. General SCCHA Operating Information

A. HOUSING STOCK INFORMATION

i. Planned New Public Housing Units

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

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

Total Public Housing Units to be Added in the Plan Year 0

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

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

N/A

ii. Planned Public Housing Units to be Removed

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

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

Total Public Housing Units to be Removed in the Plan Year

0

iii. Planned New Project Based Vouchers

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

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
777 West San Carlos	16	No	New construction project consisting of both family and special needs units. Of the 154 total units, 16 family units will be supported by PBVs.
961 Meridian	38	No	New construction family and veterans project. 38 family units will be supported with MTW PBVs, while 35 units for veterans will be supported with HUD-VASH PBVs.
Alum Rock (Charities)	26	No	New construction family project consisting of 60 total units. 26 family units will be supported with MTW PBVs.
Alvarado	40	No	New construction senior project consisting of 90 total units. 40 senior units will be supported with PBVs.
The Charles (formerly Charities Keyes)	44	No	New construction project consisting of 99 total units. 44 family units will be supported with PBVs.
Dupont	35	No	New construction project consisting of 141 total units. 35 family units will be supported with PBVs.
EAH Blossom Hill	6	No	New construction project consisting of 84 total units. 6 family units will be supported with PBVs.
Hawthorn	48	No	New construction project consisting of 103 total units. 26 family units and 22 chronically homeless units will be supported with PBVs.
Magnolias	23	No	New construction project consisting of 66 total units. 16 MTW PBV units are set aside for chronically homeless families and 7 units are for veterans supported by HUD-VASH PBVs.
Mitchell Park	25	No	New construction project consisting of 50 total units. 25 MTW PBV units will be set aside for families with special needs.
Mountain View Lot 12	25	No	New construction project consisting of 120 total units. 25 MTW PBV units are for large families.
Pavilion Inn	21	No	Rehabilitation project consisting of 43 units. 21 MTW PBV units are set aside for families with special needs.
Residence Inn	85	No	Rehabilitation project consisting of 100 total units. PBVs will support 50 families and 35 units for those with special needs.
Sonora Court	30	No	New construction family project consisting of 177 total units. 30 family units will be supported with PBVs.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Tamien Station	33	No	New construction project consisting of 134 total units. 33 family units will be supported with MTW PBVs.
Parkmoor Apartments	41	No	New construction project with 79 total units. 20 of the PBVs will be for chronically homeless families and 21 PBVs will be for low-income families

536 Planned Total Vouchers to be Newly Project-Based

iv. Planned Existing Project Based Vouchers

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

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
2275 Ellena Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
2287 Pasetta Dr	1	Leased/Issued	No	Family project consisting of 4 units (4 2-bedroom). One PBV unit.
Mariposa Place (formerly 750 West San Carlos)	40	Committed	No	New construction family project consisting of 80 total units. 40 PBVs will support the project, directed towards those with special needs.
The Algarve	36	Committed	No	91 affordable units, 46 supported by PBVs - 36 for chronically homeless individuals and families, and 10 for HUD-VASH
Agrihood Senior Apartments	54	Committed	No	New construction senior project consisting of 165 total units. 109 of the units will be affordable, and of those 54 will be supported with PBVs for seniors.
Anne Way Residence	4	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Auzerais	64	Committed	No	Family project consisting of 128 total units. 64 PBVs will support the project, directed toward the homeless and those with special needs.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Bascom	11	Committed	No	Family project consisting of 90 total units. 11 will be supported with MTW PBVs and 5 with HUD-VASH PBVs.
Bellarmino	53	Committed	No	New construction family project consisting of 116 total units. 29 family units and 24 permanent supportive housing units will be supported with PBVs.
Blossom Hill Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Calabazas	80	Leased/Issued	No	New construction family project consisting of 136 units. 80 PBVs will support the project, directed toward the homeless and those with special needs.
Carroll Inn	20	Leased/Issued	No	Family project consisting of 121 Studio units. PBV units are for disabled persons.
Casa De Novo	27	Leased/Issued	No	Family project consisting of 56 units. 27 units provide long-term supportive housing, 29 units operate as a hotel offering temporary supportive housing. PBV units are for chronically homeless families.
Casa Feliz Studios	6	Leased/Issued	No	Family project consisting of 60 studio units. PBV units are for chronically homeless families.
Charities Blossom Hill	49	Leased/Issued	No	Senior project consisting of 147 total units. 49 PBVs will support the project for seniors with special needs.
Connell Apartments	5	Leased/Issued	No	Family project consisting of 28 units (1 studio, 17 1-bedroom, and 10 2-bedroom). PBV units (2-Bedroom) are for families.
Corde Terra Senior Apartments	199	Leased/Issued	No	Senior project consisting of 199 1-bedroom units. PBV units are for persons aged 55 years and over.
Corinthian House	6	Leased/Issued	No	Senior project consisting of 102 units (62 studios and 40 1-bedroom). PBV units (1-bedroom) are for persons aged 62 years and over.
Country Hills	37	Leased/Issued	No	Family project consisting of 152 units (40 studio, 64 1-bedroom,

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				and 48 2-bedroom). PBV units (8 studio, 16 1-bedroom, and 13 2-Bedroom) are for families.
Crescent Terrace	20	Leased/Issued	No	Senior project consisting of 48 1-bedroom units. PBV units are for persons aged 62 years and over.
Crest Avenue Apartments	4	Leased/Issued	Yes	RAD conversion of former Mod Rehab project with four 2-bedroom units.
Crossings on Monterey	20	Leased/Issued	No	Family, new construction project, consisting of 39 units (6, 1-bedroom, 18, 2-bedroom and 15, 3-bedroom). PBV units are for chronically homeless families.
Curtner SRO's	6	Leased/Issued	No	Senior project consisting of 6 SRO units. PBV units are for persons aged 62 years and over.
Cypress Gardens Senior Apartments	124	Leased/Issued	No	Senior project consisting of 124 units (111 1-bedroom and 13 2-bedroom). PBV units are for persons aged 55 years and over.
Dent Avenue Apartments	4	Leased/Issued	No	Family project consisting of 24 units (6 studio, 12 1-bedroom, and 5 2-bedroom). PBV units (2 SRO and 2 2-bedroom) are for families.
Donner Lofts – CHDR	20	Leased/Issued	No	Family project consisting of 101 units (92 studio and 9 1-bedroom). PBV units are for chronically homeless families.
Eagle Park	16	Leased/Issued	No	14 Studio and 2 1-bedroom units. PBVs are for the chronically homeless and those with special needs.
Edwina Benner Plaza	23	Leased/Issued	No	Family new construction project consisting of 66 total units. 23 PBVs for families and those with special needs.
Eklund Gardens I Apartments	10	Leased/Issued	No	Family project consisting of 10 2-bedroom units. PBV units are for families.
Eklund Gardens II Apartments	6	Leased/Issued	No	Family project consisting of 6 3-bedroom units. PBV units are for families.
Emerson North	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Emerson South	1	Leased/Issued	No	Family project consisting of 6 studio units. PBV unit is for families.
Fair Oaks Senior Plaza	93	Leased/Issued	No	Senior project consisting of 124 units (11 1-bedroom and 14 2-bedroom). PBV units (80 1-bedroom and 13 2-bedroom) are for persons aged 62 years and over.
Fairlands SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Ferne	1	Leased/Issued	No	Family project consisting of 16 2-bedroom units. PBV unit is for families.
Fuji Towers	104	Leased/Issued	No	Senior project consisting of 124 units (72 studio and 68 1-bedroom). PBV units (53 studio and 51 1-bedroom) are for persons aged 62 years and over.
Gallup & Mesa	23	Leased/Issued	No	New construction family project consisting of 45 total units. 23 PBVs will support the project, directed toward the homeless and those with special needs.
Gish Apartments	6	Leased/Issued	No	Family project consisting of 35 units (9 studio, 14 2-bedroom, and 12 3-bedroom units). PBV units (3 studio and 3 2-bedroom) are for disabled families.
Hillview	132	Leased/Issued	No	132 total units, with 100 supported by Mainstream Program PBVs and 32 PBV units for the chronically homeless.
Homestead SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.
Iamesi Village (North San Pedro Apartments)	60	Leased/Issued	No	Family and veteran's new construction project, with 135 total units. 60 PBVs will be dedicated to the chronically homeless and 49 for HUD-VASH.
Immanuel-Sobrato	97	Leased/Issued	No	106 total units for the chronically homeless, 97 supported with PBVs
Julian Gardens	9	Leased/Issued	No	Family, new construction project, consisting of 9 3-bedroom units. PBV units are for families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Kifer Senior	33	Leased/Issued	No	New construction project consisting of 80 total units. 33 MTW PBVs will support units for the chronically homeless and 8 HUD-VASH PBVs will support units for veterans.
Kings Crossing Apartments	25	Leased/Issued	No	Family project consisting of 94 units (34 1-bedroom, 34 2-bedroom, and 26 3-bedroom units). PBV units (9 1-bedroom, 12 2-bedroom, and 4 3-bedroom) are for chronically homeless families.
Klee/Offenbach SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
La Avenida	7	Committed	No	New construction project consisting of 100 total units. 7 units for the chronically homeless will be supported with MTW PBVs and 25 units for veterans will be supported by HUD-VASH PBVs.
Laurel Grove Family Apartments	81	Leased/Issued	No	Family, new construction project, consisting of 82 units (14 1-bedroom, 43 2-bedroom, and 25 3-bedroom units). PBV units are for families and to be identified special needs and/or chronically homeless families.
Leigh Avenue Senior Apartments	63	Leased/Issued	No	New construction senior project, 100% PBVs for seniors.
Lenzen Gardens Senior Apartments	93	Leased/Issued	No	Senior project consisting of 94 units (89 1-bedroom and 5 2-bedroom). PBV units (89 1-bedroom and 4 2-bedroom) are for persons aged 62 years and over.
Llewellyn Residence	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Lucretia Gardens	16	Leased/Issued	No	Family project consisting of 16 3-bedroom units. PBV units are for families.
Markham Plaza I (Tully Gardens)	20	Leased/Issued	No	152-unit family project with 10 SRO PBV units for disabled families and 10 PBV units for chronically homeless families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Maryce Freelen Place	18	Leased/Issued	No	Family project consisting of 74 units (24 1-bedroom, 26 2-bedroom, and 24 3-bedroom units). PBV units (2 1-bedroom, 6 2-bedroom, and 10 3-bedroom units) are for families.
Met South	10	Leased/Issued	No	Family, new construction project, consisting of 31 units (9 studios, 8 1-bedroom, 5 2-bedroom, and 9 3-bedroom). PBV units are for seniors and large families.
Miramar Apartments	16	Leased/Issued	No	Family project consisting of 16 units (8 1-bedroom and 8 2-bedroom). PBV units are for families.
Monroe Street	8	Committed	No	Family project consisting of 65 total units. 8 family units will be supported with PBVs.
Monticelli Apartments	23	Leased/Issued	No	Family and Senior project consisting of 52 units (25 1-bedroom and 27 3-bedroom). 14 1-bedroom PBV units are for persons aged 62 and over, and 9 3-bedroom PBV units are for families.
Monterey Gateway	37	Leased/Issued	No	Senior, new construction project, consisting of 75 units (64, 1-bedroom and 11, 2-bedroom). PBV units are for chronically homeless and homeless seniors.
Moulton Plaza	8	Leased/Issued	No	Family project consisting of 66 units (30 1-bedroom, 26 2-bedroom, and 10 3-bedroom). PBV units (2 2-bedroom, and 6 3-bedroom) are for families.
Onizuka Crossing - CHDR	13	Leased/Issued	No	Family, new construction project, consisting of 58 units (27 1-bedroom, 11 2-bedroom, and 20 3-bedroom). PBV units (13 1-bedroom) are for chronically homeless families.
Opportunity Center	55	Leased/Issued	No	Family project consisting of 88 units (70 studios, 12 1-bedroom, and 6 2-bedroom). PBV units (48 studio, 3 1-bedroom, and 4 2-bedroom) are for chronically homeless families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Orchard Ranch (Palomino)	18	Leased/Issued	No	Family, new construction project, consisting of 18 total units. PBV units are for large families, those with special needs, and chronically homeless families.
Orchard Ranch (Overo)	8	Leased/Issued	No	Family, new construction project, consisting of 8 units. PBVs are for those at risk of homelessness.
Orchard Ranch (Tobiano)	14	Leased/Issued	No	Family, new construction project, consisting of 14 total units. PBVs units are for large families, families at risk of homelessness, and chronically homeless families.
Page Street	27	Leased/Issued	No	New construction family project consisting of 81 total units. 27 PBVs will support the project, directed toward the homeless and those with special needs.
Park Avenue Senior Housing	99	Leased/Issued	No	Senior, new construction, 94 1-bedroom, 5 2-bedroom. PBV units are for persons aged 55 years and over.
Parkside Studios	7	Leased/Issued	No	Family project consisting of 59 units (58 studios and 1 1-bedroom). PBV units (7 studios) are for chronically homeless families.
Parkview Senior Apartments	24	Leased/Issued	No	Senior project consisting of 140 1-bedroom units. PBV (24 1-bedroom) units are for persons aged 55 years and over.
Poco Way Apartments	10	Leased/Issued	No	Family project consisting of 130 units (14 1-bedroom, 54 2-bedroom, 54 3-bedroom and 8 3-bedroom units). PBV units (3 1-bedroom, 3 2-bedroom, and 4 3-bedroom) are for families.
Pollard SRO's	5	Leased/Issued	No	Senior project consisting of 5 SRO units. PBV units are for persons aged 60 years and over.
Quetzal Gardens	32	Leased/Issued	No	Family, new construction project, consisting of 70 total units. 32 PBVs dedicated to large families, those with special needs, and the chronically homeless.
Renascent Place	160	Leased/Issued	No	Family, new construction project, consisting of 160 units. PBV units

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				are for chronically homeless families.
Rincon Gardens Senior Apartments	198	Leased/Issued	No	Senior project consisting of 200 units (190 1-bedroom and 10 2-bedroom). PBV units (189 1-bedroom and 9 2-bedroom) are for persons aged 55 years and over.
Roosevelt Park	20	Committed	No	New construction project consisting of 80 total units. 20 family units will be supported with PBVs.
Royal Oak Village	22	Committed	No	Family project consisting of 73 total units. 22 PBVs will support large families.
San Antonio Place	30	Leased/Issued	No	Family project consisting of 120 units (118 studio, 1 1-bedroom, and 1 2-bedroom). 30 studio PBV units are for families.
San Veron Park Apartments	6	Leased/Issued	No	Family project consisting of 32 units (10 2-bedroom, 15 3-bedroom, and 7 4-bedroom). PBV units (3 2-bedroom, 2 3-bedroom, and 1 4-bedroom) are for families.
Sango Court	40	Committed	No	Family project consisting of 101 total units. 40 MTW PBVs will support the project, directed toward the homeless and those with special needs. 7 HUD-VASH PBVs will also support the project.
Santa Familia	13	Leased/Issued	No	Family project consisting of 79 units (30 1-bedroom, 23 2-bedroom, and 26 3-bedroom). PBV units (4 1-bedroom, 4 2-bedroom, and 5 3-bedroom) are for families.
Second Street Studios	134	Leased/Issued	No	Family, new construction project, consisting of 135 units (128 studios, 6 1-bedroom, and 1 2-bedroom units). PBV units are for chronically homeless families.
Shorebreeze	20	Leased/Issued	No	Family, new construction project, consisting of 61 total units. 20 PBVs for those at risk of homelessness.
Sobrato Apartments	40	Leased/Issued	No	Existing project with 40 PBVs for chronically homeless families.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Stevenson House	10	Leased/Issued	No	Senior project consisting of 120 studio and 1-bedroom units. PBV units (6 studio and 4 1-bedroom) are for persons aged 62 years and over.
Sunnyvale Block 15	22	Committed	No	New construction project consisting of 90 total units. 22 family units will be supported with PBVs.
Sunset Gardens Senior Apartments	74	Leased/Issued	No	Senior project consisting of 75 units (70 1-bedroom and 5 2-bedroom). PBV units (70 1-bedroom and 4 2-bedroom) are for persons aged 55 years and over.
Timberwood Apartments	20	Leased/Issued	No	Family project consisting of 286 units (84 studios, 164 1-bedroom, and 38 2-bedroom). PBV units (6 studio, 6 1-bedroom, and 8 2-bedroom) are for families.
Tyrella Gardens Apartments	11	Leased/Issued	No	Family project consisting of 56 units (12 1-bedroom, 32 2-bedroom, and 12 3-bedroom). PBV units (4 1-bedroom, 6 2-bedroom, and 3 3-bedroom) are for families.
Vela Apartments (Alum Rock Family Housing)	29	Leased/Issued	No	New construction family project consisting of 87 total units. 29 PBVs will support the project, directed towards the homeless and those with special needs.
Ventura	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units is for families.
Ventura Apartments	1	Leased/Issued	No	Family project consisting of 12 1- and 2-bedroom units. One 2-bedroom PBV units is for families.
Veranda	6	Leased/Issued	No	Senior, new construction project, consisting of 19 units. 6 studio PBV units are for persons aged 55 years and over.
Village at Willow Glen	20	Leased/Issued	No	Senior project consisting of 133 units. PBV units (17 1-bedroom and 3 2-bedroom) are for persons aged 55 years and over.
Villas at Fourth Street	93	Leased/Issued	No	New construction permanent supportive housing project with

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
				93 PBVs for the chronically homeless.
Villas on the Park	83	Leased/Issued	No	Family project consisting of 83 units. PBVs are for the chronically homeless.
Waldo	3	Leased/Issued	No	Family project consisting of six 1- and 2-bedroom units. Three 1-bedroom PBV units are for families.
Westwood Ambassador	10	Leased/Issued	Yes	10 PBVs units for former Mod Rehab project.
Wheeler Manor	10	Leased/Issued	No	Senior project consisting of 111 1-bedroom units. PBV units (10 1-bedroom) are for persons aged 62 years and over.
Wolfe SRO's	4	Leased/Issued	No	Senior project consisting of 4 SRO units. PBV units are for persons aged 60 years and over.

3,347

Planned Total Existing Project-Based Vouchers

v. Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

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

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

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

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

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

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

Development and financing efforts continue at Alvarado Park Senior Housing (89 units) and Bellarmino Place Family Housing (115 units) and on the four affordable housing developments at the East Santa Clara site, which will be four developments totaling 471 units. One of those sites, Hawthorn will be using MTW funds for planning and pre-development work in FY2024.

Pavilion Inn, a project Homekey site located at 1280 N. 4th St., San Jose, will use \$8.7M in MTW funds for rehabilitation work. The site will eventually add 42 units of affordable housing for transition aged youth.

The site at Autumn/Montgomery will use MTW funds in FY2024 for predevelopment and due diligence activities.

As part of the SureStay Hotel project, located at 1488 N. 1st St, San Jose, SCCHA plans to spend MTW funds, up to \$19M to acquire adjacent parcels – a Denny’s restaurant located at 1490 N. 1st St and a former EZ-8 Motel located at 1550 N. 1st St. SCCHA is exploring a possible purchase of an additional site, identified as Airport Inn at 1440 N. First St., San Jose. There are not currently MTW funds committed to Airport Inn, but it is included here in case that changes in FY2024

Approximately \$5M of MTW funds will be used for the rehabilitation of 20 units at San Pedro Gardens Apartments.

MTW funds will be used for the capital repairs and rehabilitation of three newly acquired properties, Jardines Paloma Blanca, Girasol Housing, and Las Golondrinas Apartments, totaling 152 units.

B. LEASING INFORMATION

i. Planned Number of Households Served

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	48	4
MTW Housing Choice Vouchers (HCV) Utilized	219,588	18,299
Local, Non-Traditional: Tenant-Based^	4,320	360
Local, Non-Traditional: Property-Based^	10,920	910
Local, Non-Traditional: Homeownership^	0	0
Planned Total Households Served	234,876	19,573

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
Tenant-Based	Interim Housing - Activity 2020-2	4,320	360
Property-Based	Create Affordable Housing Preservation Fund for SCCHA and Affiliate-Owned Properties/Activity 2012-4	10,920	910

Homeownership	N/A	0	0
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- * “Planned Number of Unit Months Occupied/Leased” is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.
- ** “Planned Number of Households to be Served” is calculated by dividing the “Planned Number of Unit Months Occupied/Leased” by the number of months in the Plan Year.
- ^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None
MTW Housing Choice Voucher	The Santa Clara County rental market continues to have a low vacancy rate, which leads to difficulties in leasing Housing Choice Vouchers. HCV holders who are looking for housing continue to face extremely high rents and a competitive rental environment. SCCHA increased its voucher payment standards in FY2022 and again in FY2023 for SRO through three-bedroom units and continued landlord recruitment and retention efforts. SCCHA works with a community partner to assist voucher holders in their housing search. SCCHA is also continuing to encourage the expansion of affordable housing supply through the use of Project-Based Vouchers in partnership with the City of San José and the County of Santa Clara. SCCHA anticipates that approximately 387 MTW PBV units will finish construction in FY2024.
Local, Non-Traditional	None

C. WAITING LIST INFORMATION

i. Waiting List Information Anticipated

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The “Description” column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Federal MTW Public Housing Units	Site Based	685	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific*	32,977*	Open	Yes
Project-Based, Local, Non-Traditional MTW Housing Assistance Program	Site Based	2,400	Partially Open	Yes

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

Please describe any duplication of applicants across waiting lists:

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

ii. Planned Changes to Waiting List in the Plan Year

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Federal MTW Housing Choice Voucher Program	There are no planned changes to the waiting/interest list.

III. Proposed MTW Activities (HUD Approval Requested)

This section describes one re-proposal and eight new MTW activities that SCCHA proposes to implement in FY2024.

2020-2: INTERIM HOUSING

(Re-Proposed FY2024)

Activity Description

In the FY2020 Moving to Work Plan, HUD approved this local, non-traditional activity allowing SCCHA to create a local rent subsidy program assisting special needs populations. As approved, the activity is limited to a single property with specific partners. Operating assistance is provided for short-term, temporary housing on behalf of individuals and families who are referred to SCCHA for project-based, permanent supportive housing vouchers while they wait for the permanent unit to be ready. Residents in interim housing are not charged rent. This activity has been successful in providing shelter and making connections to case management services prior to the intended permanent unit being ready for occupancy.

SCCHA would now like to expand this model outside the narrow parameters originally approved and provide assistance to other interim or short-term housing sites where the residents aren't necessarily voucher recipients. Despite the thousands of permanent supportive units that have been built in Santa Clara County since 2017, there are still roughly 10,000 homeless individuals sleeping outside, as of the most recent point-in-time count data available. Community based organizations have joined with local municipalities to fill the gap of permanent housing with short-term housing, shelters, and supportive services. The goal of the interim sites is for case manager to aid residents in locating and transitioning to permanent housing. This can take weeks or months and there is not an upper limit on the stay in the interim site. These short-term sites have been invaluable, especially as the County has faced increasingly colder and rainier winters and hotter summers. The emergency sites have restrooms, showers, hot meals, and access to services that can help connect individuals to permanent housing. SCCHA would like to be a part of this solution and use Moving to Work funds to help cover some of the operating costs that go along with short term-temporary housing.

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

Relation to Statutory Objectives

This activity addresses the statutory objective of increasing housing choices for low-income families by providing stability to clients approved for Permanent Supportive Housing when construction or other extenuating circumstances delay availability of the new unit.

Anticipated Impact of the Activity

SCCHA anticipates this activity will stabilize clients prior to moving into their permanent housing and provide case managers regular and consistent access to clients.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing the changes to this activity immediately upon approval.

Proposed Baseline, Benchmarks, Metrics and Data Collection

Benchmarks were updated to reflect the increase of families this activity will impact. Data related to this activity will be collected and retrieved at least annually from the Agency’s electronic database. As this activity is implemented, SCCHA may revise the activity’s metrics and further quantify and refine its performance baselines and benchmarks.

Activity 2020-2: Interim Housing (Re-proposed)				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for chronically homeless or homeless with disability households at or below 80% AMI as a result of the activity (increase).	0	30	30	TBD
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	0	100	100	TBD
HC #7: Households Assisted by Services that Increase Housing Choice				
Number of households receiving services aimed to increase housing choice (increase).	0	100	100	N/A

Cost Implications

This activity will involve a cost to SCCHA in the form of operating costs provided to the interim housing sites

Authorization for the Activity

The proposed activity is authorized as a local, non-traditional activity in the First Amendment to SCCHA’s MTW Agreement with HUD, which amends Attachment D, “Use of MTW Funds,” executed on April 30, 2010. This authorization is needed to allow SCCHA to use HCV funding for temporary, interim housing.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2020 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

ACTIVITY 2024-01: DIGITAL INCLUSION *(Proposed Activity)*

Activity Description

There is a documented, well-researched gap or “digital divide” separating low-income households from access to technology and broadband internet. This digital divide disproportionately affects low-income households by creating barriers to employment and education among other important opportunities. Responses to a resident survey indicate about 40% of SCCHA’s residents need support to meaningfully access the internet. To increase digital access, SCCHA proposes implementation of a local, non-traditional supportive services program to provide income-qualifying residents with devices and digital training. SCCHA continues to explore innovative ways to increase digital access for low-income* residents.

SCCHA will implement a one-year pilot program with a community partner to provide devices and training to community members who are at 80% AMI or below. In the first six months, SCCHA will provide 500 tablets to community members at digital literacy workshops currently held at libraries and community centers. SCCHA will also provide information on how to sign up for the Affordable Connectivity Program for those who still need affordable internet connection. In the second six months, SCCHA will continue to support community members at large as well as bring digital literacy training to up to ten SCCHA owned properties and provide up to 500 additional tablets to community members at 80% AMI or below. SCCHA will hire a Digital Inclusion Coordinator to conduct this pilot along with the support of admin staff. This pilot is planned for one year, but this activity may continue if funding permits.

In implementing this digital inclusion activity, SCCHA will waive HUD inspection requirements outlined in PIH Notice 2011-45. HUD inspection requirements place an undue burden on residents and SCCHA to comply and track, when the support provided through this activity does not relate to the rental unit. Waiving these requirements will encourage residents to seek the much-needed support provided by this activity.

Relation to Statutory Objectives

This activity supports the statutory objective of promoting participants’ economic self-sufficiency.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity in FY2024.

Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2024-01 Digital Inclusion				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
<i>SS #5: Households Assisted by Services that Increase Self Sufficiency</i>				
Number of households receiving services aimed to increase self-sufficiency (increase).	0	3,529	3,529	TBD

*Defined by 3(b)(2) of the 1937 Act

Cost Implications

SCCHA anticipates that the proposed activity will increase costs in the provision of digital access and literacy services.

Authorization for the Activity

This proposed activity is authorized in SCCHA’s First Amendment to Moving to Work Agreement, Attachment D – Use of Funds, and consistent with PIH Notice 2011-45.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2024 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

2024-02: RENTAL ASSISTANCE FOR STUDENT PARENTS OBTAINING POST-SECONDARY EDUCATION (Proposed Activity)

Activity Description

Heads of households with children often face multiple barriers to furthering their education and obtaining employment that will provide their families with adequate income to become self-sufficient. Low-income parents may be discouraged from pursuing a degree or certification due to competing priorities such as stable housing and childcare. SCCHA is proposing a local, non-

traditional activity that will secure funds for a service organization to provide housing, academic and career coaching, and childcare to low-income families while they complete their post-secondary education program.

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

The activity’s dual-generation education support model will empower low-income families to complete their educational goals while their children receive care that supports their cognitive, social, and emotional development, thus leading families to financial stability and self-reliance.

Relation to Statutory Objectives

This activity supports the statutory objective to increase housing choices for low-income families and to promote participants’ economic self-sufficiency through supporting heads of households who are participating in post-secondary educational programs.

Anticipated Schedule for Achieving the Stated Objectives

Upon approval, SCCHA will begin program development and select a service provider. SCCHA anticipates that the pilot will be implemented in 2024.

Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2024-02				
Rental Assistance for Post-Secondary Education Students with Children				
Unit of Measurement	Baseline	Benchmark*	Projected Outcome*	Benchmark Achieved?
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for households at or below 80% AMI because of the activity	0	TBD	TBD	TBD
HC #5: Increase in Resident Mobility				
Number of households able to move to a better unit and/or neighborhood of opportunity because of the activity (increase).	0	TBD	TBD	TBD
SS #5: Households Assisted by Services that Increase Self-Sufficiency				

Number of households receiving services aimed to increase self-sufficiency (increase).	0	TBD	TBD	TBD
SS #8: Households Transitioned to Self Sufficiency**				
Number of households transitioned to self-sufficiency (increase).	0	TBD	TBD	TBD
*Benchmarks and Projected Outcomes will be updated after program launch **Self-sufficiency is defined as a participant exiting the program for any other reason than terminating of subsidy/participation.				

Cost Implications

SCCHA anticipates that there will be no cost implications related to the implementation of the proposed activity. Support services will be provided by a third-party agency.

Authorization for the Activity

The proposed activity includes components that are authorized in SCCHA’s Moving to Work Agreement, Attachment C, Paragraphs B.1, B.2, D.2.d, and D.4 and waives certain provisions of Sections 8 and 9 of the 1937 Act and 24 CFR 982 and 990, Sections 13 and 35 of the 1937 Act and 24 CFR 941 Subpart F, Sections 8(o)(7) and 8(o)(13)(F)-(G) of the 1937 Act and 24 CFR 982 Subpart L and 983 Subpart E, and Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 CFR 982 Subpart E, 982.305, and 983 Subpart F as well as the First Amendment to SCCHA’s MTW Agreement with HUD, which amends Attachment D, “Use of MTW Funds.” The proposed activity will provide self-sufficiency and supportive services as a local non-traditional activity that are permissible as stated in PIH Notice 2011-45. These authorizations are needed for a local non-traditional activity to prioritize vouchers for post-secondary education students and to provide temporary housing for the duration of their education.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2024 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

2024-03: SHORT TERM BRIDGE LOAN *(Proposed Activity)*

Activity Description

According to the National Low Income Housing Coalition, Santa Clara County needs a total of 54,148 new affordable rental homes, including a 40,550 at or below extremely low income simply to meet existing need.

To support the effort of increasing the housing stock, SCCHA will use its MTW funds and its development experience to support affordable housing development in Santa Clara County. In this activity, SCCHA will seek and pursue opportunities to support the development of new rental housing units and the acquisition of land for affordable housing, by making short term loans to affordable housing development partners.

These short-term loans provide flexible financing for the development of affordable multifamily rental and supportive housing throughout Santa Clara County. These loans can be used for predevelopment, acquisition, construction/rehab and bridge financing by nonprofit organizations, or limited partnerships and single asset entities with nonprofit sponsors. The loans may range from \$1 million to \$10 million and will be within the HUD Total Development Cost and Housnig Cost Cap Limits, or an alternative Total Development Cost methodology, as agreed upon with HUD.

All projects funded by SCCHA under this program will include recordation of an affordability restriction on the property. The period of affordability under SCCHA’s recorded land use restriction for these short-term loans will depend on the amount of the loan. Loans up to \$1 million will require a three-year period of affordability; loans more than \$1 million but less than \$5 million will require a five-year period of affordability; and loans more than \$5 million (and for no more than \$10 million) will require a ten-year period of affordability.

The full repayment of the principal of these short-term loans is intended to be made prior to occupancy of the completed project but may be extend to no later than the end of the period of affordability at the sole discretion of SCCHA. The payment of the interest accrued on all short-term loans will be deferred and due no later than the end of the period of affordability. Upon the payment of both the principal and interest, the period of affordability will end and SCCHA will terminate its land use restriction. Once repaid, the funds will be used for an MTW eligible purpose.

SCCHA will meet its inspection responsibility on the units developed or rehabilitated using these short-term loans by using alternative inspection protocol(s) being conducted on the property during the period of affordability. SCCHA will further retain the right to conduct a Housing Quality Standards (HQS) inspection during the period of affordability if SCCHA has reason to believe a unit no longer meets the HQS standard.

In order to encourage long-term affordability of the units assisted by these short-term loans, the application process for these short-term loans will prioritize projects that will ensure affordable housing for tenants at or below 80 percent of the Area Median Income (AMI) for at least 30 years via recorded use agreements or covenants.

SCCHA will ensure reasonable parameters based on underlying project and sponsor profile and conduct due diligence to ensure sustainability of this activity. This activity will enable SCCHA to jumpstart the creation and preservation of desperately needed low-income rental housing units across the county.

Relation to Statutory Objectives

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

Anticipated Schedule for Achieving the Stated Objectives

SCCHA plans to implement this activity in FY2024.

Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2024-03 Short Term Bridge Loan				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC#1: Additional Units of Housing Made Available				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	60	60	TBD
HC#2: Units of Housing Preserved				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	0	30	30	TBD

Cost Implications

SCCHA anticipates that there will be costs associated with this activity.

Authorization for the Short-Term Bridge Loan

This proposed activity is authorized in SCCHA’s Moving to Work Agreement, Attachment D – Use of Funds; and consistent with PIH Notice 2011-45.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2024 MTW Annual Plan. SCCHA will obtain approval from its Board of

Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

2024-04: STREAMLINE OFFER OF NEW LEASE PROCESS *(Proposed Activity)*

Activity Description

Pursuant to 24 CFR 982.308, SCCHA is required to execute a new HAP contract when there are changes in lease requirements governing utility or appliance responsibilities or the term of the lease. SCCHA refers to this process as an Offer of New Lease. The process to update these two changes can be lengthy and burdensome for the owner, tenant, and SCCHA, thus creating delays in rent increase payments and confusion on HAP contract effective dates.

SCCHA proposes to streamline its Offer of New Lease process by waiving the requirement to execute a new HAP contract due to lease changes. Staff will continue to update files and communicate changes to all parties involved. This activity will alleviate staff time and costs associated with the completion of a HAP contract, tenancy addendum, and lease.

SCCHA recruited a consultant in 2020 to evaluate best practices for owner recruitment and retention. Based on the feedback from owners, it was recommended to streamline HCV processes to ensure timely payments and communication of rent and lease changes for the owner and tenant. The effect of streamlining the process not only improves response and completion times for Offer of New Leases, but they also reduce staff time and agency costs.

Relation to Statutory Objectives

The proposed activity supports the statutory objective of achieving greater cost effectiveness in federal expenditures by eliminating the administrative burden placed on SCCHA staff to execute new HAP contracts due to changes in utility or appliance responsibilities or the term of the lease.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity upon approval.

Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2024-04 STREAMLINE OFFER OF NEW LEASE PROCESS				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
CE #1: Agency Cost Savings				

Total cost of task in dollars (decrease).	\$23,494	\$11,747	\$17,620	TBD
CE #2: Staff Time Savings				
Total time to complete the task in staff hours (decrease).	720	360	540	TBD

Cost Implications

SCCHA anticipates that the proposed activity will not have any cost implications for the agency.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Paragraph D (2)(b) of SCCHA’s MTW Agreement with HUD and waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24.CFR 982.308, 982.451 and 983 Subpart E as necessary to implement the Agency’s Annual MTW Plan. This authorization is needed to modify the content of contract rental agreements to streamline the Offer of New Lease process.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2024 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

2024-05: BUENA VISTA MOBILE HOME PARK *(Proposed Activity)*

Activity Description

In 2017 SCCHA, with local partners, purchased the Buena Vista Mobile Home Park in Palo Alto, one of the highest cost cities in Santa Clara County, to preserve affordable housing and prevent the imminent displacement of residents. Since then, SCCHA has made substantial investments to improve the infrastructure and quality of life for the residents of Buena Vista. As the Housing Authority now works to redevelop the Buena Vista Mobile Home Park, SCCHA requests the following MTW flexibilities: to provide Housing Choice Vouchers to residents who are permanently relocated; to create a direct referral program that allows residents who currently reside at the park to receive a project-based voucher upon move-in to their new permanent unit onsite; and to provide project-based housing assistance to mobile home units.

The first step in the extensive development work is the safe temporary relocation of tenants so the site-work can begin. SCCHA is currently analyzing different redevelopment scenarios and phasing plans and intends to avoid triggering permanent relocation (relocation for more than 12 months) for all households. However, permanent relocation for some households might be

unavoidable. To this end, SCCHA would like to institute a direct referral program to offer a Housing Choice Voucher to eligible Buena Vista residents. This option provides more stability for Buena Vista’s very low-income residents than other options, such as permanent relocation with no rental subsidy.

Additionally, when construction is complete, SCCHA plans to directly refer to the newly constructed PBV units, any families who were current residents at the time redevelopment began. This is an important piece of the plan as the development plans may require the temporary relocation of the long-term residents and allowing those who are eligible to return will prevent permanent displacement.

The final piece of this activity uses SCCHA’s MTW authority to project-base manufactured housing, an otherwise prohibited unit type under the PBV program. SCCHA would apply the rules and statutory requirements of the manufactured home program in the HCV program, found at 24 CFR 982.620 -.624, to eligible families. The waiver from activity 2019-3, waiving the requirement to re-determine reasonableness for manufactured home spaces annually would also apply.

SCCHA will apply existing MTW Activities to this proposed initiative, where appropriate, including but not limited to, activity 2011-02, which allows SCCHA to simplify the requirements regarding third party inspections and rent requirements.

Relation to Statutory Objectives

This activity supports the statutory objective of expanding participants’ housing choices.

Anticipated Schedule for Achieving the Stated Objectives

SCCHA anticipates implementing this activity upon approval and using the flexibility as necessary.

Proposed Baseline, Benchmarks, Metrics and Data Collection

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

Activity 2024-05 Buena Vista Mobile Home Park				
Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #1: Additional Units of Housing Made Available				
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	75	25	100	TBD

Unit of Measurement	Baseline	Benchmark	Projected Outcome	Benchmark Achieved?
HC #2: Units of Housing Preserved				
Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase). If units reach a specific type of household, give that type in this box.	75	25	100	TBD

Cost Implications

SCCHA anticipates that the proposed activity will increase costs related to the direct referral vouchers and the costs of construction.

Authorization for the Activity

The proposed activity is authorized in Attachment C, Section (D)(1)(f) of SCCHA’s MTW Agreement with HUD and waives certain provisions of Sections 8(o)(7) and 8(o)(13) of the 1937 Act and 24 CFR 983.53(a)(5), 982.451 and 983 Subpart, and Attachment C Section (F)(7)(d) which waives certain provisions of Section 8(o)(8) of the 1937 Act and 24 C.F.R. 982 Subpart I, and Attachment C, Section (D)(4), which waives certain provisions of Sections 8(o)(6), 8(o)(13)(J) and 8(o)(16) of the 1937 Act and 24 C.F.R. 982 Subpart E, 982.305 and 983 Subpart F as necessary to implement the Agency’s Annual MTW Plan. These authorizations are needed to allow PBV assistance for manufactured housing space rent, and provide a direct referral program.

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

This activity does not qualify as a Rent Reform Initiative.

This activity was made available for public review and included as a proposed activity in the public hearing held for the FY2024 MTW Annual Plan. SCCHA will obtain approval from its Board of Commissioners prior to the activity’s implementation. The impact of this activity will be evaluated annually in SCCHA’s MTW Report.

IV. Approved MTW Activities (HUD Approval Previously Granted)

To date, SCCHA has had 60 activities approved by HUD. Of these, fifteen were closed out in previous years. SCCHA anticipates closing out activities 2020-5 and 2010-2 in the FY2023 MTW Annual Report.

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

Implemented Activities

ACTIVITY 2009-1: REDUCED FREQUENCY OF TENANT REEXAMINATIONS

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

DESCRIPTION OF MTW ACTIVITY

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

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

SCCHA does not anticipate any significant changes to this activity.

ACTIVITY 2009-2: EXPEDITING INITIAL ELIGIBILITY INCOME VERIFICATION PROCESS

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

Extending the documentation timeframe continues to provide administrative relief, both to applicants and to SCCHA. SCCHA will continue to use this activity in FY2024.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This activity, first implemented in 2010, allows SCCHA to utilize the owner-provided Tenant Income Certification (TIC) form required under the Low-Income Housing Tax Credit (LIHTC) Program as its sole method for verification of the family’s income and assets when filling PBV vacancies for tax credit units.

Prior to implementation, households selected to fill a PBV unit that utilized tax credits had to complete initial eligibility calculations under both the Federal LIHTC regulations (Section 42 of the IRS Code) and the Section 8 PBV regulations (24 CFR 5.657, 5.659).

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows SCCHA to project-base more than 25% of the units in housing projects that make supportive services available. Although services must be made available and families must be made aware of and encouraged to participate in these services, families do not need to participate in the supportive services. This MTW activity increases housing choices for low-income families by making the units more attractive to families who do not want or need supportive services.

UPDATE ON MTW ACTIVITY

The activity continues to reduce SCCHA’s administrative burden by removing the required compliance monitoring for families living in the “excepted” units (i.e. units above the 25% cap).

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2009-14: PAYMENT STANDARD CHANGES BETWEEN REGULAR REEXAMINATIONS

PLAN YEAR APPROVED: FY2009 IMPLEMENTED: FY2010 AMENDED: FY2014

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

This MTW activity allows the Agency to select SCCHA-owned housing for project-based assistance without a competitive process, saving both staff time and other costs that would be related to a competitive process. As a result of this activity, SCCHA is able to cost-effectively and efficiently ensure that these project-based units are available.

UPDATE ON MTW ACTIVITY

SCCHA last utilized this activity in early 2022 to allocate PBVs to the Bellarmino and Alvarado projects, both in San Jose. SCCHA tentatively plans to utilize this activity in FY2024 to allocate PBVs to the Hawthorn, Trillium, Sage, and Elderberry projects, also in San Jose.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

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

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

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

UPDATE ON MTW ACTIVITY

SCCHA continues to realize the ongoing benefits associated with reduced costs and administrative streamlining related to this activity.

PLANNED NON-SIGNIFICANT CHANGES

Section III –MTW Activities | Implemented

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

The activity does not apply to families:

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

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2012 IMPLEMENTED: FY2012 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

SCCHA’s development activities will expand in FY2024. Development and financing efforts continue at Alvarado Park Senior Housing (89 units) and Bellarmino Place Family Housing (115 units). The two developments were purchased with \$12M in MTW funds. Development and financing will also continue on the four affordable housing developments at the East Santa Clara site. Approximately \$30M in MTW funds were used purchase the land for what will be four developments totaling 471 units. One of those sites, Hawthorn will be using MTW funds for planning and pre-development work in FY2024. Funds are also committed, and may be spent in FY2024 at the other three projects in the amounts of: \$5M at Primrose, \$5M at Mayberry, and \$5M at Sage Family Apartments.

Pavilion Inn, a Project Homekey site located at 1280 N. 4th St., San Jose, will use \$8.7M in MTW funds for rehabilitation work. The site will eventually add 42 units of affordable housing for transition aged youth.

SCCHA was awarded the right to develop a site at Autumn/Montgomery, by the City of San Jose, which will eventually be part of a transit-oriented development site. This site is located at 255 Autumn St., 240/260 Montgomery St. and will include hundreds of units of affordable housing. MTW funds will be used in FY2024 for predevelopment and due diligence activities.

In FY2023 SCCHA spent \$500,000 on predevelopment and due diligence for the SureStay Hotel located at 1488 N. 1st St, San Jose. As part of this project SCCHA plans to spend additional MTW funds, up to \$19M to acquire adjacent parcels – a Denny’s restaurant located at 1490 N. First St. and a former EZ-8 Motel located at 1550 N. 1st St. SCCHA is exploring a possible purchase of an additional site, Airport Inn at 1440 N. First St., San Jose. There are not currently MTW funds committed to this site, but it is included here in case that changes in FY2024.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2012 IMPLEMENTED: FY2012 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

Section III –MTW Activities | Implemented

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

UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity to preserve the long-term stability and viability of existing SCCHA owned and affiliate owned housing. SCCHA plans to use approximately \$5 million in MTW funds for the rehabilitation of 20 units at San Pedro Gardens Apartments during FY2024. SCCHA is also planning to use approximately \$12M in MTW funds to complete upgrades at the Jardines, Paloma Blanca, Girasol Housing, and Las Golondrinas Apartments, associated with the acquisition from HUD. The Buena Vista Mobile Home Park will also be using funds in FY2024 for pre-development activities.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2013 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

SCCHA plans to modify the range for calculation of Total Tenant Payment (TTP) to between 28 and 35 percent of the participant family’s gross monthly income. This will give SCCHA further flexibility to adjust tenant rent share in response to changing economic conditions and the agency’s fiscal health.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

PLAN YEAR APPROVED: FY2015 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

ACTIVITY 2015-3: MODIFIED ELDERLY DEFINITION FOR PBV

PLAN YEAR APPROVED: FY2015 IMPLEMENTED: FY2015 AMENDED: N/A

DESCRIPTION OF MTW ACTIVITY

HUD currently defines elderly to be persons aged 62 year or older and elderly families to those whose head, spouse or co-head are 62 years of age or older. This activity modifies the age, for the Project-Based Voucher (PBV) program, at which a person or family is considered elderly from persons aged 62 or older to persons aged 55 or older to align with the definition used by several affordable housing developments in the area. Therefore, PBV sites which define elderly as 55 years of age and older are considered an elderly property.

UPDATE ON MTW ACTIVITY

This change in the definition allows SCCHA to refer a larger pool of applicants (any family with Head of Household or Spouse aged 55 and older) from its PBV waiting list to fill vacancies in these units and will allow the Agency to project-base 100% of the units in a project with aged 55 or older limitations (project is not subject to the 25% PBV per project cap). SCCHA increased the number of available units for households who otherwise would not have qualified under the property’s definition of elderly.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

ACTIVITY 2016-2: STREAMLINING OF PBV SELECTION REQUIREMENTS

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

DESCRIPTION OF MTW ACTIVITY

This activity enables SCCHA to select Project-Based Voucher proposals without conducting a competitive selection process where: 1) the proposed project was previously selected for award through any form of

open public solicitation or invitation process conducted by a Federal, State, or local government entity, where a proposal is selected subject to funding availability; and 2) the proposed project was selected by the other government entity within the last fifteen years. This activity also eliminates the regulatory requirement that the previous selection process not consider rental assistance for the proposed project and allows proposers to include PBV assistance in their calculations.

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

ACTIVITY 2017-1: PHASING IN THE SUBSIDY STANDARD CHANGE

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

ACTIVITY 2017-2: SPECIAL NEEDS POPULATION DIRECT REFERRAL PROGRAM

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

Re-proposed again in FY2019, Activity 2017-3 expanded the initiatives SCCHA offers landlords to increase and maintain rental units available for Section 8 families. Offering a one-time bonus payment for new landlords between \$500 and \$2,500—based on a program-wide contract rent average, bonus payments provide new owners with an incentive to participate in the HCV program.

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

UPDATE ON MTW ACTIVITY

SCCHA originally implemented the use of loyalty bonus payments in March 2017 before seeking to streamline the process of administering the payments in FY2018. The expansion of the initiative in FY2019 offering one-time bonus payments to new owners who rent to a Section 8 tenant was implemented in January 2019. The loyalty bonus payment and new landlord bonus payment are both currently set at a

flat \$1,500 amount.

SCCHA is updating Activity 2017-3 to add a landlord assurance fund to its MTW landlord initiatives. It will reimburse property owners for certain HCV tenant-caused physical damage costs, beyond normal wear and tear that exceed the security deposit amount, up to \$2,500. At a minimum, claims must be made timely, include documentation of damage incurred and provide verification that the claim took place during an assisted family’s tenancy, to be considered for reimbursement. Through this activity update, SCCHA hopes to provide additional incentives to attract new owners to the HCV program and increase the number of rental units available for Section 8 families.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

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

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

DESCRIPTION OF MTW ACTIVITY

This activity allows SCCHA to eliminate the HUD requirement that a PHA annually re-determine that the current rent to owner is a reasonable rent for rent charged for a manufactured home space. SCCHA continues to perform a full rent reasonableness review at the time of a new contract, owner requested rent changes, tenant request, or when deemed necessary by SCCHA staff.

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2019-4: STREAMLINING THE LEASE UP PROCESS

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

DESCRIPTION OF MTW ACTIVITY

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

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2020-1: PBV PROGRAM CAP

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2020-2: INTERIM HOUSING

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

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

This activity is being re-proposed in this Plan for FY2024.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2020-3: OVER HOUSED/UNDER HOUSED PBV HOUSEHOLDS

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

DESCRIPTION OF MTW ACTIVITY

This activity modifies SCCHA’s subsidy standards for the Project-Based Voucher program such that if a family is over-housed or under housed but not in violation of Housing Quality Standards space standards, the family may remain in the wrong sized unit if the rental market vacancy rate is below five percent until (1) an appropriate sized unit becomes available at the project; or (2) the family requests a tenant-based voucher, whichever occurs first.

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2020-4: RENT TO OWNERS & RENT REASONABLENESS

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

DESCRIPTION OF MTW ACTIVITY

HUD regulations require that during an assisted tenancy, the rent paid to owner not exceed the reasonable rent as determined by the Public Housing Authority (in comparison with comparable units in the current rental market). Occasionally, upon an owner’s request for a rent adjustment of a specific amount (which can be done annually), the reasonable rent for the unit according to rental comparisons of similar units will not only **not** support the increased rent amount the owner is requesting but will be lower than the current approved rent for the unit. In these situations, HUD regulations require that SCCHA reduce the approved contract rent to reflect the current reasonable rent.

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

UPDATE ON MTW ACTIVITY

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

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2021-1: IMPOSE LIMITS ON PBV TO HCV CONVERSION

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

DESCRIPTION OF MTW ACTIVITY

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

UPDATE ON MTW ACTIVITY

SCCHA will continue to use this activity.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

There are no planned significant changes to this activity.

2021-2: MINIMUM RENT HARDSHIP EXEMPTION

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

DESCRIPTION OF MTW ACTIVITY

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

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

UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

2022-3: MAINSTREAM TURNOVER VOUCHER ISSUANCE FLEXIBILITY

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

DESCRIPTION OF MTW ACTIVITY

This activity waives the PIH Notice 2020-01 requirements to issue turnover vouchers to wait list applicants and allows SCCHA to issue turnover vouchers to applicants who have been directly referred by SCCHA’s partner agency. The 2017, 2018, and 2019 Mainstream Voucher Program Funding Opportunities encourage PHAs to partner with local Continuum of Care agencies for direct referrals and to create a preference for homeless or at-risk of homelessness Mainstream

participants. In cases where eligible direct referral applicants who meet the preference for homelessness, at-risk of homelessness, institutionalized, or at-risk of institutionalization are unavailable, SCCHA plans to continue to utilize the interest/waiting list to fill Mainstream Program turnover vouchers.

UPDATE ON MTW ACTIVITY

SCCHA continues to use this activity.

PLANNED NON-SIGNIFICANT CHANGES

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

PLANNED CHANGES TO METRICS/DATA COLLECTION

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

PLANNED SIGNIFICANT CHANGES

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

Activities Not Yet Implemented

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

PLAN YEAR APPROVED: FY2017

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

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

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

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

2019-1: GRADUATION BONUS

PLAN YEAR APPROVED: FY2019

PLAN YEAR AMENDED: FY2022

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

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

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

2022-1: HOMEOWNERSHIP AND ASSET LIMIT FOR ELIGIBILITY

PLAN YEAR APPROVED: FY2022

This activity makes the following applicants ineligible for SCCHA’s Section 8 program:

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

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

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

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

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

PLAN YEAR APPROVED: FY2022

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

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

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

2022-4: MODIFIED PBV CONTRACT RENTS

PLAN YEAR APPROVED: FY2022

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

units).

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

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

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

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

Activities On Hold

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

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

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

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

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

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

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

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

ACTIVITY 2014-3: FREEZE ON CONTRACT RENT INCREASES

Implemented in FY2014, this activity imposed a freeze on any owner requested rent increases for one-year effective September 2013 through August 2014. Effective September 1, 2014, SCCHA lifted the freeze and accepted owner requested rent increases again. This activity helped reduce

costs by controlling increases to Housing Assistance Payments (HAP) while reducing labor costs but had negative effects on owner retention. Currently, there are no plans to re-implement this activity. Subsequent freezes on owner requested rent increases are subject to SCCHA's Board of Commissioners' approval and are limited to a one-year term.

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

ACTIVITY 2020-5: ELIMINATE THE 40% OF INCOME CAP AT INITIAL LEASING

This activity was proposed in a technical amendment to the FY2020 MTW Annual Plan shortly after Santa Clara County imposed Shelter-in-Place orders in response to the COVID-19 pandemic and was implemented immediately upon approval. This activity waived the requirements of 24 CFR 982.508 and allowed families to rent a unit above 40% of their income, providing a larger pool of units for them to select from. The activity was re-proposed in the FY2022 MTW Annual Plan in order to extend its expiration date, but was not utilized past the original technical amendment expiration date.

There are no changes to the activity's metrics, baselines, or benchmarks. SCCHA plans to close out this activity in the FY2023 MTW Annual Report.

Closed Out Activities

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

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<p>2010-1 Eliminating 100% Excluded Income from the Income Calculation Process</p>	<p>With the publication of PIH Notice 2013-4, issued January 28, 2013, the verification and calculation of 100% excluded income is no longer required. Therefore, SCCHA eliminated this activity in FY2013. This activity saved labor time and costs.</p>	<p>This activity was closed out in FY2013</p>
<p>2012-1 Create Standard Utility Allowance Schedule</p>	<p>SCCHA utilizes MTW Activity 2014-4, which simplifies the rent calculation method and eliminates utility allowances. Because of Activity 2014-4, MTW Activity 2012-1 is no longer necessary and was closed out prior to implementation.</p>	<p>This activity was closed out in FY2013</p>
<p>2014-1a & 2014-1b Focus Forward Program (and amendments)</p>	<p>After reviewing the outcomes of time-limited voucher programs, SCCHA determined this pilot program did not meet the needs of the local community and close it out prior to implementation.</p>	<p>This activity was closed out in FY2022</p>
<p>2014-2 Eliminate Requirement to Re-Determine Rent Reasonableness when HUD decreased Fair Market Rent</p>	<p>This activity was closed out prior to being implemented because HUD regulations made this activity moot.</p>	<p>This activity was closed out in FY2022</p>
<p>2015-1 Using UPCS or Local Inspection Standards to Determine Housing Quality Standards</p>	<p>On June 25, 2014, HUD published in the Federal Register that, effective July 1, 2014, “A PHA may comply with the biennial inspection requirement through reliance upon an inspection conducted for another housing assistance program. If a PHA relies on an alternative inspection to fulfill the biennial inspection requirement for a particular unit, then the PHA must identify the alternative standard in its administrative plan.” Therefore, this activity was closed without implementation because HUD’s directive superseded this activity.</p>	<p>This activity was closed out in FY2015</p>
<p>2016-1 Restriction on Head of Household Changes</p>	<p>This activity was intended to be implemented when the Focus Forward Program (Activity 2014-1a/1b) was implemented. Activity 2014 1a/1b was not implemented and was closed in FY2022.</p>	<p>This activity was closed out in FY2022</p>
<p>2018-1 Strengthening Partnerships through Capacity Building</p>	<p>This activity was intended to be implemented when the Focus Forward Program (Activity 2014-1a/1b) was implemented. Activity 2014 1a/1b was not implemented and was closed in FY2022.</p>	<p>This activity was closed out in FY2022</p>

ACTIVITY	WHY THE ACTIVITY WAS CLOSED	YEAR CLOSED
<p>2020-6 Reduced Frequency of Periodic Inspections (Not Implemented/On-Hold)</p>	<p>This activity was proposed in a technical amendment to the FY 2020 MTW Annual Plan shortly after Santa Clara County imposed Shelter in Place orders in response the COVID-19 pandemic and was implemented immediately upon Plan approval. On April 13, 2020, SCCHA adopted COVID-19 waiver HQS-5 and resumed performance of biennial HQS inspections. Families who are uncomfortable allowing the performance of an inspection could cancel biennial HQS inspections and have the inspection rescheduled to a later date removing the need to move to a three-year regular HQS inspection cycle as proposed by this activity. Under HUD COVID-19 Waiver HQS-5 SCCHA must inspect units with delayed inspections by June 30, 2022. SCCHA will continue to allow families to cancel scheduled biennial HQS inspections until December 21, 2021. Because of HQS-5 SCCHA did not re-propose this activity in a subsequent MTW Annual Plan.</p>	<p>This activity was closed out in FY2021</p>

V. Planned Application of MTW Funds

The information reported in Section V. serves as a placeholder until the FY2024 budget is approved by the SCCHA Board of Commissioners. At the time the FY2024 budget is approved (June 2024) SCCHA will update Section V. and re-submit the Plan to HUD.

A. PLANNED APPLICATION OF MTW FUNDS

i. Estimated Sources of MTW Funds

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

Note 1: Source in Analysis

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

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

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

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

ii. Estimated Application of MTW Funds

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

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

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

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

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

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

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

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

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

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

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

Note 2 - Source Out Analysis

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

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

91810 - Allocated Overhead - \$0:

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

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

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

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

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

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

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

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

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

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

iii. Description of Planned Application of MTW Single Fund Flexibility

PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

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

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

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

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

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

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

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

B. LOCAL ASSET MANAGEMENT PLAN

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

C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
N/A

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

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

N/A

VI. Administrative

A. BOARD RESOLUTION ADOPTING THE FY2024 ANNUAL MTW PLAN AND CERTIFICATIONS OF COMPLIANCE

The SCCHA Board Resolution adopting the FY2024 MTW Annual Plan and the Certifications of Compliance from the County of Santa Clara and the City of San José are attached as **Appendix One** to this Plan.

B. CERTIFICATION OF PAYMENTS

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

C. DISCLOSURE OF LOBBYING ACTIVITIES

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

D. DOCUMENTATION OF THE PUBLIC PROCESS FOR THE FY2023 ANNUAL MTW PLAN

SCCHA’s FY2024 MTW Annual Plan was made available for public review from March 30 through March 31, 2023. The public hearing for the plan was held on March 16, 2023. There were 4 members of the public and the comments are listed below.

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

In FY2024, SCCHA will continue to refine its approach to data gathering and monitoring of MTW activities and their impacts on stated goals and objectives. SCCHA is planning a full-scale study and evaluation of its MTW activities.

Public Comments

Individual or Organization	Comment	SCCHA Response
Surinder B	How does SCCHA monitor staff responsiveness to clients? Responsiveness helps strengthen SCCHA’s relationship with the community. I would like to know more details and speak to someone about my experience with SCCHA.	SCCHA’s operations team works directly with clients. We have internal performance standards used to monitor responsiveness. Provided email address commenter can contact to share more details and get more information.
Surinder B	I would like to express my appreciation for SCCHA staff and their dedication. Performance and practices vary so much from agency to agency. Are there	HUD monitors all public housing authorities, as public housing authorities are funded by HUD. SCCHA is not aware of other entities

	<p>entities out there that monitor or provide ratings of different public housing authorities?</p>	<p>that monitor public housing authorities. SCCHA also submits to HUD an MTW Report annually to share results from its MTW initiatives and the agency's accomplishments over the report year. SCCHA also monitors its own performance internally and looks for ways to improve its programs and operations.</p>
<p>Surinder B</p>	<p>How does City Council review the MTW Plan? Santa Clara County includes other cities too, so why is the San Jose the only city that reviews and approves the MTW Plan?</p>	<p>A memo requesting approval of the MTW Plan will go to City Council at the April 11 council meeting. Because SCCHA also administers vouchers for the Housing Authority of the City of San Jose, SCCHA asks for the city to review and approve the MTW Plan.</p>

Appendix One: Resolution No. 23-17

RESOLUTION NO. 23- 17

**RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE
SANTA CLARA COUNTY HOUSING AUTHORITY APPROVING SUBMISSION OF THE
FY2024 MOVING TO WORK (MTW) ANNUAL PLAN TO US DEPARTMENT OF HUD**

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

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

WHEREAS, currently in its fifteenth year in the MTW Program, SCCHA has drafted its FY2024 Moving to Work Annual Plan, solicited public comment and conducted a public hearing on the Plan; and

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

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

1. Certifies the statements in the attached Certifications of Compliance with Regulations; and
2. Approves the Fiscal Year 2024 Moving to Work Annual Plan for SCCHA and the Housing Authority of the City of San José; and
3. Authorizes SCCHA to submit the Annual Plan to the U.S. Department of Housing and Urban Development on behalf of both agencies.


PASSED AND ADOPTED by the Board of Commissioners of the Santa Clara County Housing Authority, State of California, on April 6, 2023, held at 505 W. Julian Street, City of San Jose, State of California, upon motion from Commissioner William Anderson and seconded by Commissioner Denis O'neal with the following vote:

AYES: Chair Jennifer Loving, Vice chair Denis O'neal, Commissioner William Anderson, Commissioner Adrienne Lawton, Commissioner Marilyn Russell, Commissioner Fricka Mendietta

NAYS: None

ABSTAIN: None

ABSENT: None

By: 
Jennifer Loving, Chair

ATTEST: 
Claudia Bautista, Clerk of the Board

APPROVED AS TO FORM:

Adrian R. Guerra, General Counsel

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

The undersigned, Claudia Bautista, Clerk of the Applicant, does hereby attest and certify that the foregoing Resolution, being Resolution No. 23-17, has not been altered, amended, or repealed and was duly passed, approved and adopted by the Board of Commissioners of the Santa Clara County Housing Authority at a meeting held on 6th day of April 2023, and that the same was passed by the following vote:

AYES: Chair Jennifer Coing, Vice Chair Denis O'neal, Commissioner William Anderson,
Commissioner Adrienne Lawton, Commissioner Marlynn Russell, Commissioner Erika Mendietta

NOES: None

ABSTAIN: None

ABSENT: None

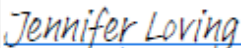
Executed this 6th day of April, 2023.



Claudia Bautista
Clerk of the Board

MTW CERTIFICATIONS OF COMPLIANCE
<p>U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT OFFICE OF PUBLIC AND INDIAN HOUSING</p> <p>Certifications of Compliance with Regulations: Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan</p>
<p>Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:</p> <ol style="list-style-type: none"> (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment. (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement. (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD). (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws. (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located. (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan. (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions. (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146. (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing. (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped. (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135. (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F. (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment. (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

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

<u>Housing Authority of the City of San Jose</u>	CA056
<i>MTW PHA NAME</i>	<i>MTW PHA NUMBER/HA CODE</i>
<i>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).</i>	
Jennifer Loving	Chair, Board of Commissioners
<i>NAME OF AUTHORIZED OFFICIAL</i>	<i>TITLE</i>
 <small>Jennifer Loving (Apr 7, 2023 10:01 PDT)</small>	04/07/2023
<i>SIGNATURE</i>	<i>DATE</i>
<small>* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</small>	

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

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

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

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

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

<u>Santa Clara County Housing Authority</u>	<u>CA059</u>
<i>MTW PHA NAME</i>	<i>MTW PHA NUMBER/HA CODE</i>
<i>I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).</i>	
<u>Jennifer Loving</u>	<u>Chair, Board of Commissioners</u>
<i>NAME OF AUTHORIZED OFFICIAL</i>	<i>TITLE</i>
<u>Jennifer Loving</u> <small>Jennifer Loving (Apr 7, 2023 11:01 PDT)</small>	<u>04/07/2023</u>
<i>SIGNATURE</i>	<i>DATE</i>
<small>* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.</small>	

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County of Santa Clara

Office of Supportive Housing

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



April 6, 2023

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

RE: FY2024 Moving to Work Plan Certification of Compliance

Dear Mr. Prince:

I hereby certify that the Santa Clara County Housing Authority's Fiscal Year 2024 Moving to Work (MTW) Plan as drafted is consistent with the direction of the Urban County of Santa Clara 2020-2025 Consolidated Plan, which includes an Analysis of Impediments to Fair Housing Choice.

The Housing Authority's FY2024 MTW Plan activities and objectives are consistent with the five-year goals of the Urban County of Santa Clara 2020-2025 Consolidated Plan in the efforts to:

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

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

Sincerely,

DocuSigned by:

Consuelo Hernandez

782319C0D832A4C

Consuelo Hernandez, AICP

Director, County of Santa Clara Office of Supportive Housing

Board of Supervisors: Sylvia Arenas, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian
County Executive: Jeffrey V. Smith



Department of Housing

April 13, 2023

RE: Fiscal Year 2024 Moving to Work Plan Certificate of Compliance

To the Santa Clara County Housing Authority:

I/we hereby certify that the Santa Clara County Housing Authority's Moving to Work (MTW) Plan for Fiscal Year (FY) 2024 is, as drafted, consistent with the direction of the City of San José's 2020-2025 Consolidated Plan, which was approved by the City Council in August 2020.

The Housing Authority's FY2024 MTW Plan activities and objectives are consistent with the five-year goal of the City of San José's 2020-2025 Consolidated Plan in the efforts to:

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

A handwritten signature in blue ink, appearing to read "Jacky Morales-Ferrand".

Jacky Morales-Ferrand
Director, Housing Department

Appendix Two: Certifications of Payments (HUD 50071)

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

**Certification of Payments
to Influence Federal Transactions**

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

Applicant Name _____

CA059 Santa Clara County Housing Authority

Program/Activity Receiving Federal Grant Funding _____

Section 8 Housing Choice Voucher Program

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

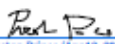
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection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

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

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

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

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

Name of Authorized Official Preston Prince	Title Executive Director
Signature  <small>Preston Prince (Apr 12, 2023 13:16 EDT)</small>	Date (mm/dd/yyyy) 4/12/2023

Previous edition is obsolete

form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

**Certification of Payments
to Influence Federal Transactions**

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

OMB Approval No. 2577-0157 (Exp. 03/31/2020)

Applicant Name

CA056 Housing Authority of the City of San Jose

Program/Activity Receiving Federal Grant Funding

Section 8 Housing Choice Voucher Program

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

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

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

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

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

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

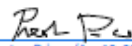
Name of Authorized Official

Preston Prince

Title

Executive Director

Signature


Preston Prince (Apr 12, 2023 13:16 EDT)

Date (mm/dd/yyyy)

4/12/2023

Previous edition is obsolete


form HUD 50071 (01/14)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

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

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
 (See reverse for public burden disclosure.)

Approved by OMB
 0348-0046


1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input checked="" type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance N/A	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award N/A	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____ N/A
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Housing Authority of the City of San Jose 505 W. Julian St San Jose, CA 95110 Congressional District, if known: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	7. Federal Program Name/Description: N/A CFDA Number, if applicable: _____	
8. Federal Action Number, if known: N/A	9. Award Amount, if known: \$ N/A	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Fennel Consulting LLC 101 Constitution Ave, N.W. Suite 800 Washington, D.C. 20001	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Fennel, Melody Preston, Michael	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  Print Name: Preston Prince Title: Executive Director Telephone No.: (408) 993-2903 Date: 4/12/2023	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

DISCLOSURE OF LOBBYING ACTIVITIES

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

Approved by OMB
0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance N/A	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award N/A	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____ N/A
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Santa Clara County Housing Authority 505 W. Julian St San Jose, CA 95110 Congressional District, if known: 4c		5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known:
6. Federal Department/Agency: U.S. Department of Housing and Urban Development	7. Federal Program Name/Description: N/A CFDA Number, if applicable: _____	
8. Federal Action Number, if known: N/A	9. Award Amount, if known: \$ N/A	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Fennel Consulting LLC 101 Constitution Ave, N.W. Suite 800 Washington, D.C. 20001	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): Fennel, Melody Preston, Michael	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature:  <small>Preston Prince (Apr 12, 2023 13:36 EDT)</small> Print Name: <u>Preston Prince</u> Title: <u>Executive Director</u> Telephone No.: <u>(408) 993-2903</u> Date: <u>4/12/2023</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)