



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together

# 2024

*Annual Plan*

# MOVING to WORK

# Board of Commissioners



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together



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# Our Mission

The Housing Authority of the County of San Bernardino empowers all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

# Our Vision

The Housing Authority of the County of San Bernardino is committed to creating a world in which all people have a stable and enriched quality of life.

# Our Core Values

## *Respect*

We believe that all people should have a stable and enriched quality of life and should be afforded the opportunity to not only survive, but to thrive in environments that are sensitive to and encourage respect and empathy for individual circumstances.

## *Safety*

We believe that all residents deserve a safe and secure living environment that is crime- and distraction-free and where families can feel good about raising their children and seniors can enjoy a high quality of life.

## *Integrity*

We believe that there is a strong, mutually reinforcing connection between the integrity of our staff/programs and the success of our clients. Integrity-building within our organization is key to fulfilling our mission statement.

## *Service*

We believe that, in order to be successful, we must serve the public by being effective stewards of its financial resources and by developing a customer service business model based on benchmarks and measurements.

## *Innovation*

We believe that improvement is the outcome of purposeful, collaborative effort that leverages talent, research, and technology to create solutions and enhance our potential to serve the community.

# HACSB Leadership Team



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together



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<b>I. INTRODUCTION.....</b>	<b>1</b>
WHO WE ARE.....	1
<i>Our Vision</i> .....	1
<i>Our Mission</i> .....	1
<i>Our Core Values</i> .....	1
THE MOVING TO WORK DESIGNATION.....	1
CONTENTS OF THIS PLAN .....	2
LONG-TERM GOALS.....	3
SHORT-TERM GOALS .....	3
<b>II. OPERATING INFORMATION .....</b>	<b>5</b>
AGENCY OVERVIEW .....	5
A. HOUSING STOCK INFORMATION .....	6
B. LEASING INFORMATION .....	12
C. WAITING LIST INFORMATION .....	14
<b>III. PROPOSED ACTIVITIES .....</b>	<b>16</b>
<i>Activity 30: Valencia Grove Phase II, Affordable Rent Strategy</i> .....	16
<b>IV. APPROVED ACTIVITIES.....</b>	<b>20</b>
A. IMPLEMENTED ACTIVITIES .....	20
<i>Activity 1: Single-Fund Budget</i> .....	20
<i>Activity 4: Biennial and Triennial Recertifications</i> .....	21
<i>Activity 5: Simplified Income Determination</i> .....	24
<i>Activity 8: Local Policies for Portability</i> .....	27
<i>Activity 10: Minimum Rent</i> .....	29
<i>Activity 11: Local Project-Based Voucher Program</i> .....	31
<i>Activity 12: Local Payment Standards and Alternative Flat Rents</i> .....	36
<i>Activity 13: Local Inspection Policies</i> .....	39
<i>Activity 14: Local Asset Management Program</i> .....	42
<i>Activity 18: Property Management Innovation</i> .....	43
<i>Activity 20: Term-Limited Lease Assistance</i> .....	45
<i>Activity 22: Streamlined Lease Assistance</i> .....	51
<i>Activity 23: No Child Left Unsheltered</i> .....	56
<i>Activity 24: Transition for Over-Income Public Housing and Housing Choice Voucher Families</i> .....	60
<i>Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing</i> .....	63
<i>Activity 26: Local Disaster Short-Term Rental Assistance Program</i> .....	65



Activity 27: Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents .....	68
Activity 28: Leasing Success Strategies .....	72
Activity 29: Moving On Strategy .....	74
B. NOT YET IMPLEMENTED ACTIVITIES .....	76
C. ACTIVITIES ON HOLD .....	77
Activity 3: Alternate Assessment Programs .....	77
D. CLOSED OUT ACTIVITIES .....	78
Activity 2: Strategic Investment Policies .....	78
Activity 6: Elimination of Assets .....	78
Activity 7: Controlled Program Moves .....	79
Activity 9: Elimination of Earned Income Disallowance .....	79
Activity 15: Pilot Work Requirement .....	80
Activity 16: Operating Subsidy for Vista del Sol .....	80
Activity 17: Local Income Inclusions .....	81
Activity 19: Local Family Self-Sufficiency Program .....	81
Activity 21: Utility Allowance Reform .....	82
<b>V. SOURCES AND USES OF MTW FUNDS .....</b>	<b>83</b>
A. ESTIMATED SOURCES AND USES OF MTW FUNDS .....	83
B. LOCAL ASSET MANAGEMENT PLAN .....	87
C. RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION .....	88
<b>VI. ADMINISTRATIVE .....</b>	<b>89</b>
A. BOARD RESOLUTION AND CERTIFICATION OF COMPLIANCE .....	89
B. DOCUMENTATION OF PUBLIC PROCESS .....	95
C. PLANNED AND ONGOING EVALUATIONS .....	97
D. LOBBYING DISCLOSURES .....	99
<b>APPENDICES .....</b>	<b>102</b>
APPENDIX A. ANNUAL STATEMENT/PERFORMANCE AND EVALUATION REPORT (FORM HUD-50075.1) .....	102
APPENDIX B. LOCAL ASSET MANAGEMENT PLAN (LAMP) .....	106
APPENDIX C. NON-MOVING TO WORK INFORMATION .....	111
APPENDIX D. FACT SHEETS .....	115
APPENDIX E. SUMMARY OF HACSB MOVING TO WORK ACTIVITIES .....	120

# I. Introduction

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## Who We Are

As the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 24,000 people, most of whom are seniors, individuals with disabilities, veterans, and children. Since 1941, we have helped low-income households attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). More than 10,400 households are served through housing assistance payments made to landlords on behalf of the families or reside in units owned and managed by HACSB. These programs provide a critical safety net for families in San Bernardino County.

Our service to the community is built upon our Vision, Mission, and Core Values. These principles direct our efforts and guide our interactions with every customer.

### Our Vision

HACSB is committed to creating a world in which all people have a stable and enriched quality of life.

### Our Mission

HACSB empowers all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

### Our Core Values

Respect  
Safety  
Integrity  
Service  
Innovation

## The Moving to Work Designation

Moving to Work (MTW) is a national demonstration program for housing authorities. Contrary to its name, the Moving to Work demonstration is not a work requirement program. Instead, the intent of the MTW demonstration is to provide policy and regulatory flexibility to housing agencies to design and test affordable housing strategies and related policies. MTW-designated agencies are required to develop local policies and programs targeting at least one of the three MTW Statutory Objectives:

1. Reduce program costs and increase cost efficiency

2. Encourage assisted families to pursue economic self-sufficiency

3. Increase housing choice for low-income families

Roughly 2% of housing authorities across the country are designated as MTW agencies. The lessons learned by these agencies can and do influence national housing policy to improve housing programs and services for all households.

As a testament to our high performance, HACSB was designated by Congress in 2008 as a MTW agency. The MTW designation allows HACSB to waive some HUD program regulations in order to target the three MTW Statutory Objectives. Since receiving the MTW designation, HACSB has developed and received approval for 29 MTW activities.

## Contents of This Plan

This Annual Moving to Work Plan provides detailed information on the planned use of MTW flexibilities during HACSB's fiscal year. Information is organized into the following sections following the format required by HUD as outlined in the current approved Form HUD-50900:

- *Section I: Introduction* provides information about HACSB's short-term and long-term goals and accomplishments.
- *Section II: General Housing Authority Operating Information* provides an overview of the agency's housing portfolio, leasing rates, and wait list information.
- *Section III: Proposed MTW Activities* contains proposed new MTW activities and/or proposed changes to previously approved MTW activities. Previously approved activities are included in this section if there is proposed modification that requires new MTW authorization, while minor modifications to previously approved activities are included in Section IV. This section includes the new proposed activity #30 – Valencia Grove, Phase II – Affordable Rent Strategy.
- *Section IV: Approved MTW Activities* provides information on previously approved uses of MTW authority, including minor modifications not requiring new MTW authorization. This section also includes information about closed out activities, including the closing of activity #19 - Local Family Self-Sufficiency program through this Annual MTW Plan.
- *Section V: Sources and Uses of MTW Funds* describes the agency's projected MTW revenues and expenditures for the fiscal year, planned use of the MTW single-fund flexibility, and information about HACSB's local asset management program (LAMP) and participation in the Rental Assistance Demonstration (RAD) program.
- *Section VI: Administrative* provides required administrative information, including information about the approval process for this Plan.



## Long-Term Goals

In 2022 HACSB began the process of updating its long-term goals through a strategic planning process. Through this process, HACSB identified five Aspirational Statements which reflect the direction of the agency and align with the statutory objectives of the MTW designation and guide our work. HACSB's Aspirational Statements are:

### Aspirational Statement #1

To ensure our agency's culture empowers and values our team through effective communication, learning opportunities, work life balance, professional development, and a shared passion for the mission.

### Aspirational Statement #2

To be known as a trusted provider of safe, dignified, and desirable homes and environments that enrich and add value to the community.

### Aspirational Statement #3

To pursue continued financial stability, monitoring, and accountability as stewards of limited funding.

### Aspirational Statement #4

To utilize research and technology to drive innovative programming and operational processes which allow us to be more responsive and result in the advancement of the families we serve.

### Aspirational Statement #5

To create, build and utilize partnerships that provide opportunities and create a meaningful difference in the lives of the families that we serve, maximizing our resources by mobilizing the talents of our community partners.

The flexibilities provided through our MTW designation assist in our efforts to achieve our long-term goals, and our strategic plan aligns with the statutory objectives of the MTW program.

## Short-Term Goals

Our short-term goals are designed to help us achieve progress toward achieving and sustaining our long-term goals:

**Goal 1 - *Operational efficiency through innovation*** – Maximizing HACSB's economic viability and sustainability through the following strategies:

- Research, implement and maintain technology to improve service delivery and enhance external communication.
- Use software systems to enhance, streamline, and increase productivity.
- Use Moving to Work flexibilities and research-informed policy decisions to drive and expand innovation.

- The work environment is collaborative, diverse, equitable, and inclusive, and offers opportunities for interaction.
- Identify, reorganize, and implement financial processes to assist in monitoring HACSB's major programs and portfolio.

In addition to implementing non-MTW activities to address this goal, we have implemented twelve MTW activities that address this goal.

***Goal 2 – Develop economically independent clients*** – *Facilitating opportunities for families and individuals to become self-sufficient and financially independent to transition from dependency on housing subsidy through the following strategies:*

- Create an internal partnership management structure that supports, strengthens, and evaluates partnerships to improve program outcomes.
- Work alongside customers and staff to identify resource needs, gaps, and priorities to focus our pursuit of partnerships that most effectively address our customers' needs.

In addition to implementing non-MTW activities to address this goal, we have implemented nine MTW activities that address this goal.

***Goal 3 – Ensure freedom of housing choice*** – *Providing quality affordable housing opportunities in mixed-income communities with access to excellent quality of life through the following strategies:*

- Create a Road Map for real estate developments.
- Develop and implement an internal Repair and Replacement plan that assesses and prioritizes the needs of all properties and establish a finance plan to fund these needs.
- Ensure that leasing efforts align with voucher/funding utilization for all rental assistance programs.

In addition to implementing the above non-MTW activities to address this goal, we have developed or implemented eight MTW activities that address this goal.

## II. Operating Information

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This section provides an overview of the Housing Authority of the County of San Bernardino's (HACSB) housing portfolio, leasing, and waiting list information.

### Agency Overview

HACSB provides rental assistance to more than 10,400 households throughout the County of San Bernardino through HUD-funded programs including the Housing Choice Voucher Program, special programs such as the Continuum of Care (formerly known as Shelter Plus Care), Veterans Administration Supportive Housing (VASH) vouchers, Mainstream, Emergency Housing Vouchers (EHV), and our HACSB-owned affordable rental communities. We provide households a stepping stone through difficult economic times and, in conjunction with community partners, assist them on their path to economic independence.

In May 2021 HACSB was allocated funding for up to 455 new vouchers under the Emergency Housing Voucher (EHV) program. This new rental assistance program, which was created through the American Rescue Plan Act (ARPA) of 2021, helps households locate rental housing and provides financial assistance to make their rent affordable. ARPA authorizes the EHV program and related funding through September 30, 2030, for up to 70,000 Emergency Housing Vouchers to be administered by Housing Authorities across the country. Housing authorities are not permitted to re-issue Emergency Housing Vouchers after September 30, 2023. EHV is a referral-based program, and eligible households must be referred to HACSB either through the San Bernardino County Coordinated Entry System (CES) or by a victim services provider (VSP) who is not a member of the County's Continuum of Care (COC). EHV is a special program and generally not subject to a MTW agency's local MTW activities. However, HUD permits MTW agencies to request approval from HUD's Office of Housing Voucher Programs to apply approved MTW activities to EHV's they administer. HACSB requested and was granted waiver authority to apply certain local MTW activities to the EHV program. More information about the applicability of HACSB MTW activities to the EHV program is included in Section IV – Approved Activities.

HACSB launched the EHV program in San Bernardino County on October 4, 2021, and received 1,388 EHV referrals through November 7, 2022. HACSB's EHV wait list is closed and no longer taking referrals. As July 4, 2023, 432 EHV vouchers have been leased, and expect all 455 vouchers to be leased by September 30, 2023. More information about EHV is available on HACSB's website at <https://hacsb.com/emergency-housing-vouchers/>.

## A. Housing Stock Information

### i. Planned New Public Housing Units

HACSB does not plan to add any new Public Housing units in FY 2023-2024.

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

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

Since HACSB has completed the full RAD conversion of 252 units at its Public Housing community formerly known as Waterman Gardens, it plans to submit a HUD 52860 application for the remaining excess land.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER		NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
-	-	0	
-Total Public Housing Units to be Removed in the Plan Year		0	

### iii. Planned New Project-Based Vouchers

HACSB does not plan to allocate new project-based vouchers in FY 2023-2024.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
-	0	-	-
<b>Planned Total Vouchers to be Newly Project-Based</b>	<b>0</b>		

### iv. Planned Existing Project-Based Vouchers

This table shows the project-based vouchers, including Rental Assistance Demonstration (RAD) project-based vouchers, anticipated to be in place at the end of FYE 2024. This table includes project-based vouchers that have been awarded (committed) or are leased/issued.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
Andalusia	17	Leased/Issued	No	Family Community, Existing Development
Arrowhead Woods	51	Leased/Issued	No	Senior Community, Existing Development
Barstow (AMP 7)	217	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Bloomington (Related Phase I)	11	Leased/Issued	No	Family & Senior Community, New Development
Bloomington (Related Phase II)	20	Leased/Issued	No	Family Community, New Development
Bloomington (Related Phase III)	20	Leased/Issued	No	Family Community, New Development
Colton/Chino (AMP 6)	174	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Day Creek Villas, Rancho Cucamonga	8	Leased/Issued	No	Senior Community, New Development
Desert Haven (Queens Motel), Victorville	31	Leased/Issued	No	Chronically Homeless, Existing Development
Desert Village	46	Leased/Issued	No	Senior Community, Existing Development

Golden Apartments, San Bernardino	38	Leased/Issued	No	Chronically Homeless, Existing Development
Grandview Towers	40	Leased/Issued	No	Senior Community, Existing Development
Horizons at Yucaipa	50	Leased/Issued	No	Senior Community, New Development
Ivy at College Park, Chino	8	Leased/Issued	No	Family Community, New Development
Los Olivos, Upland	98	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Las Terrazas Apartments, Colton	9	Leased/Issued	No	Family Community, Existing Development
Maplewood Homes	296	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Meadowbrook	47	Leased/Issued	No	Senior Community, Existing Development
Mentone Clusters	33	Leased/Issued	No	Family Community, Existing Development
NCLU- Scattered Sites (HACSB)	26	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites (Housing Partners I, Inc. – “HPI”)	10	Leased/Issued	No	Project-Based Voucher Program
NCLU- Scattered Sites (Summit Place)	4	Leased/Issued	No	Project-Based Voucher Program
Redlands/Highland (AMP 5)	87	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Redwood Terrace	68	Leased/Issued	No	Senior Community, Existing Development
Rialto Metrolink, Rialto	8	Committed	No	Family Community, New Development
Robert O Townsend	47	Leased/Issued	No	Senior Community, Existing Development
Rosena Fountains, Fontana	8	Leased/Issued	No	Family Community, New Development
Scattered Site Units	229	Leased/Issued	No	Family Community, Existing Development (HPI)
Scattered Site Units	79	Leased/Issued	No	Family Community, Existing Development (HPI)
Scattered Sites (AMP 2)	97	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Scattered Sites (AMP 3)	34	Leased/Issued	Yes	RAD Conversion, Existing Public Housing Community
Sunrise Vista	79	Leased/Issued	No	Family Community, Existing Development



Sunset Pointe	70	Leased/Issued	No	Family Community, Existing Development
Valencia Grove, Redlands (Phase I)	85	Leased/Issued	No	Family Community, New Development
Valencia Grove, Redlands (Phase II)	8	Committed	No	Family Community, New Development
Veterans' Housing, Loma Linda	36	Committed	No	Veterans' Housing, New Development
Victorville National CORE site – 17951 Dante St., Victorville	12	Leased/Issued	No	Family Community, Existing Development
Vista del Sol	53	Leased/Issued	No	Senior Community, Existing Development
Waterman Gardens Phase 1 - Valencia Vista	75	Leased/Issued	Yes	Family Community, New Development
Waterman Gardens Phase 2 - Olive Meadow	61	Leased/Issued	Yes	Family Community, New Development
Waterman Gardens Phase 3 – Crestview Terrace	116	Leased/Issued	Yes	Family Community, Existing Development
Yucaipa Crest	45	Leased/Issued	No	Senior Community, Existing Development
<b>Total</b>	<b>2,551</b>			

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

Valencia Grove, Redlands - The groundbreaking of Phase II of rental housing (104 units) began in January 2023, with construction targeted to be completed in the third quarter of 2024. The third and final phase of development remains to complete the transition of the entire former Redlands-Lugonia Public Housing site (now known as Valencia Grove) from its original 115 housing units to a total of 238 units. Uncertain economic conditions, including rising interest rates, have delayed implementation of the third phase. HACSB development staff, in collaboration with affiliate nonprofit Housing Partners I, Inc., is evaluating different financing scenarios and continuing negotiations with a fee developer as well as Habitat for Humanity, who has expressed an interest in participating in the development as a minor partner. Phase III at Valencia Grove will consist of the construction of 39 detached single-family homes for sale to buyers at or below 120% of the Area Median Income. Groundbreaking of this phase is optimistically projected for the end of CY 2023. More information will be provided as it is available.

## vi. General Description of All Planned Capital Expenditures

2020 marked the conclusion of our original portfolio RAD conversion strategy (and subsequent physical rehabilitation) for the entirety of HACSB's Affordable (Public) Housing portfolio. We received approval from HUD in December 2014 to convert our entire Public Housing portfolio under the RAD program, wherein existing Public Housing subsidies are converted to rental assistance (vouchers). The initial phase closed at the end of April

2016, converting 552 units in four different Asset Management Projects (AMPs). Capital funding was utilized to complete work identified under the RAD Physical Needs Assessments, and that work was 100% complete as of January 2018.

The second phase of the RAD portfolio transaction included conversion of 354 remaining units in three different AMPs. The RAD conversion transaction for the second phase closed in September 2018, whereupon rehabilitation work identified under the RAD Physical Needs Assessments commenced with a then targeted completion by the end of 2019. Subsequently, staff re-analyzed the physical renovations planned for Barstow Public Housing sites (AMP 170) and implemented changes to the project to achieve a higher level of physical rehabilitation along with other measures to ensure long-term viability of the site(s). The COVID-19 pandemic caused physical rehabilitation work funded by the Capital Fund to be extended into 2023 with completion expected early in the year. This was required because the bidding process had to be repeated multiple times to achieve a higher response level to ensure the most competitive pricing.

Construction of the initial on-site phase (62 units) of the Waterman Gardens revitalization project (the second RAD conversion project) broke ground in May 2016 and was completed and occupied as of September 2017. The new community, now called Arrowhead Grove, will eventually include over 400 mixed-income housing units as well as commercial/community facilities intended to provide employment and training opportunities supporting HACSB's MTW initiatives. Housing affordability remains the primary focus for the development as well as revitalization of the broader neighborhood, as evidenced by the initial RAD application which supported the development of the 75-unit Valencia Vista (AKA Val-9) Apartments on an adjacent site (completed and occupied in 2016). HACSB and its developer partner planned and implemented a mix of RAD and project-based voucher units with substantial funding secured through Low Income Housing Tax Credits. The existing 252 ACC units are being replaced on a one-for-one basis (transitioned to RAD project-based vouchers) over the course of the multiple-phase redevelopment. The second on-site phase (184 units) received allocations of low-income housing tax credits and tax-exempt bonds along with a \$20 million dollar infusion of state of California Affordable Housing and Sustainable Communities (AHSC) program funds by the end of 2018. The very complex financial transaction included the RAD closing, HACSB's issuance of \$55 million in tax exempt bonds, a tax credit closing funding nearly \$15 million in equity, and approximately \$10 million in state and local funding to bring construction sources to approximately \$80 million. This funding enabled construction to start in October 2019 for the final phase of the RAD conversion project at Waterman Gardens. A phased occupancy of units commenced in May 2021 and overall construction was completed in August 2021 with full occupancy achieved by November 2021.

In 2022 we continued pre-construction work (finalizing preparation of the site for construction and securing building permits and financing documents), for the second phase of construction (104 family rental units) at the Redlands-Lugonia site (AMP 150, sites 01, 8, & 9), with an eye on commencing construction in early 2023.

As summarized above, the majority of HACSB's original Public Housing units converted under RAD at the end of September 2018. The last site remaining for conversion after that was the 98-unit Los Olivos site which was acquired by HACSB through the transfer of the Upland Housing Authority's Public Housing and Housing Choice Voucher programs. This site was anticipated to close under RAD in August 2019. However, staff paused the transaction to thoroughly analyze the potential benefit of transitioning the site through Section 22 Streamlined Voluntary Conversion pursuant

to HUD PIH Notice 2019-05. Ultimately, it was determined that it is in the best interest of HACSB and the Upland residents to convert under the normal RAD process. The conversion process was completed as of May 2022. Utilizing Capital Fund, in 2022 HACSB continued to complete capital improvements identified under the site's Physical Needs Assessments to ensure that the units will continue to meet the needs of residents over the long term. Such work includes building systems renovations, Section 504-unit accessibility, and miscellaneous dwelling interior and exterior improvements.

**FY 2023/2024:**

Capital Fund available for physical improvements at Public Housing sites has been substantially reduced due to the conversion of subsidy for the entirety of HACSB's original Public Housing portfolio to vouchers under the RAD program. Any remaining allocation of Capital Funds will be utilized in 2023 to complete the work identified in the Physical Needs Assessment(s) for both the Barstow and Upland sites already converted under RAD.

While Capital Fund is no longer available, HACSB's major Public Housing redevelopment efforts continue in Redlands (AMP 150, sites 19-01, 8 & 9) where the second phase of new construction will add 104 units of affordable housing to the site to complement the 85 units completed in 2016. Construction of that project commenced in January 2023. We are utilizing an innovative financing structure to support this development, including a variable rate taxable bond issue leveraged with HACSB and Housing Partners I, Inc. (HPI) equity secured through the refinancing of various portfolio properties. The financing structure provides us with a more flexible rent revenue stream with which we intend to fund future housing development.

## B. Leasing Information

### i. Planned Number of Households Served

The following table presents projected voucher utilization for MTW vouchers and Public Housing occupancy for HACSB's single remaining Public Housing unit at the end of FY 2024. In FY 2022 all but one of HACSB's remaining Public Housing units converted to project-based voucher units through the HUD RAD program, and this change is reflected in the number of Public Housing units anticipated to be leased during the fiscal year.

Housing Assistance Payment (HAP) expenses have risen over the previous several years and are expected to increase further in FYE 2024. Due to a higher-than-expected inflation factor applied to Calendar Year 2021, 2022 and 2023 funding, HACSB had undertaken enhanced leasing efforts in FYE 2021, 2022 and 2023.

The MTW Public Housing units anticipated to be leased include one single-family home in AMP 180 comprising twelve unit-months. A total of 1 family is expected to be served through Public Housing during FY 2024.

HACSB does not have any local non-traditional MTW funded programs.

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	12	1
MTW Housing Choice Voucher (HCV) Utilized	118,560	9,880
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
<b>Planned Total Households Served</b>	<b>118,572</b>	<b>9,881</b>

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
Tenant-Based	N/A	0	0
Property-Based	N/A	0	0
Homeownership	N/A	0	0

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None.
MTW Housing Choice Voucher	Vacancy rates and lack of housing inventory throughout the county remains low. HACSB continues to provide households with the maximum allowable search time and necessary extensions for verified extenuating circumstances. Additionally, HACSB has implemented a landlord incentive program to encourage participation by landlords to make available additional units to households. Additionally, HACSB has implemented housing navigation services as authorized via our MTW Activity 28. We are seeing incremental improvement in our utilization numbers and will continue to use these tools to maximize utilization as funding allows.
Local, Non-Traditional	N/A.

## C. Waiting List Information

HACSB's wait list strategies vary to match the needs of different communities and housing programs. Applicants may be, and often are, on multiple wait lists at the same time. This duplication is described in the following tables.

HACSB anticipates that community need for affordable housing will remain high in FYE 2024. The following table shows the projected number of households on wait lists for Public Housing units and vouchers as of the beginning of FYE 2024. HACSB does not currently envision organizational or policy changes to wait lists.

### Housing Choice Vouchers

HACSB maintains a single tenant-based voucher (TBV) wait list with the exception of the Emergency Housing Voucher program, for which HACSB maintained a program-specific wait list from January 7, 2022, to November 7, 2022. The TBV wait list was most recently opened for 24 days in June 2022; 26,170 applications were received. The opening was conducted through our online wait list portal, and a call center was available to assist customers with their questions, take applications over the phone, and to respond to requests for reasonable accommodations. The wait list is now closed. However, HACSB has accepted Family Unification Program referrals to the wait list since 2021. We do not anticipate opening the TBV wait list in FYE 2024.

Separate site-specific wait lists are maintained for each project-based voucher (PBV) property and are opened and closed according to the needs of each site.

In November 2022, HACSB closed the wait list for Yucaipa Terrace PBV due to the PBV program contract ending and the property converting to the State Housing and Community Development (HCD) program. All applicants were removed from the Yucaipa Terrace wait list and mailed a notification letter with the option to contact the property if interested in the new program.

In February 2023, HACSB opened a the new PBV waiting list for Rialto Metrolink South, a new development that includes eight PBV units. HACSB began pulling applicants from this waiting list in April 2023.

### Public Housing and Rental Assistance Demonstration Units

Site-specific wait lists are offered by bedroom size for all HACSB Public Housing/RAD communities. All wait lists under this program are maintained centrally to maximize efficiencies and promote housing choice.

HACSB's application for conversion of a large portion of its portfolio under the Rental Assistance Demonstration (RAD) program was approved in December 2014, and the process of converting all sites (with the exception of one single-family home) was completed in calendar year 2022. As a result, HACSB moved all applications on the wait lists for the converted Public Housing sites to site-based RAD PBV wait lists. The applications retain



their original date and time of application and are subject to the preferences that apply to the PBV wait lists. Applicants were notified of the change and offered the opportunity to opt out of placement on the HACSB PBV wait lists.

HACSB does not maintain a wait list for its single remaining Public Housing unit. Applications will be accepted at turnover for that unit.

### i. Waiting List Information Anticipated

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
Public Housing	Centrally managed, site-specific, by bedroom size	0	Closed	All waiting lists closed and moved to RAD PBV
Rental Assistance Demonstration Sites - PBV	Centrally managed, site-specific, by bedroom size	40,366	Closed	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	31,315	Closed	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	25,890	Closed	No

DESCRIPTION OF DUPLICATION OF APPLICANTS ACROSS WAITING LISTS
34% of applications are duplicates, representing families who have applied to two or more waiting lists. There are 64,397 unduplicated households on HACSB's waiting lists.

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

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Rental Assistance Demonstration Sites – PBV	Possible review and update of all RAD waiting lists for active and interested applicants.
Housing Choice Voucher – Tenant-Based	In April 2023, HACSB began selecting applicants from the 2022 TBV waiting list.

## III. Proposed Activities

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### Activity 30: Valencia Grove Phase II, Affordable Rent Strategy

#### a. Activity Description

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

Constructed in 1943, the original Public Housing community located in the city of Redlands was the first affordable housing community built by HACSB after its formation in 1941. The original site consisted of 115 Public Housing units. Despite several upgrades throughout the years, the site was in need of infrastructure improvements. In partnership with HUD, HACSB, and its developer partner, Housing Partners I, Inc. (HPI), began the process of revitalizing the community in three phases in 2010. Phase I was completed and fully occupied in 2016. Phase II will include 104 affordable rental units, and Phase III is planned to include 39 single-family townhomes available to first-time homebuyers. When completed, the fully redeveloped community will include 238 units. The 104 units of Phase II will be affordable multifamily rental units, including eight 4-bedroom project-based voucher (PBV) units. The rent structure will be established using the Low-Income Housing Tax Credit (LIHTC) rent schedule for individuals with incomes at or below 80% of Area Median Income (AMI). This will ensure the rents for the community are affordable to low-income households.

Through this activity, HACSB will approve a higher contract rent for PBV units and TBV units than for other affordable non-voucher units at Valencia Grove Phase II. This modification will increase rent revenue for the development without impact to tenants. Of the 104 affordable multifamily unit development, the contract rent for the eight 4-bedroom PBV units will be set at \$3,625 for applicants with incomes under 50% of the Area Median Income (AMI), as established in HACSB's Agreement to Enter into Housing Assistance Payments Contract Agreement (AHAP) for the site. For any tenant-based voucher units, the contract rent will be lower of the reasonable rent (based on existing rent reasonableness determination procedures) or HACSB's Local Payment Standard (LPS). For all other affordable non-voucher units at the development, the contract rent will be established using the LIHTC rent schedule for individuals with incomes at or below 80% of the AMI, minus the utility allowance.

#### b. Activity Metrics Information

In accordance with HUD form 50900, HACSB will report on this activity using the following metrics:

- HC #1: Additional Units of Housing Made Available

## c. Cost Implications

This activity will not have a direct impact to the tenant. This activity will increase the rental revenue for Valencia Grove, Phase II, by allowing HACSB to approve higher contract rent for project-based and tenant-based voucher units than for the other affordable non-voucher units within the development. This will contribute to the long-term sustainability of the development. As mentioned above, the rent will not exceed HACSB's Local Payment Standard or rent reasonableness, of which the Housing Assistance Payment (HAP) costs for TBV and PBV units at this property are not expected to vary from similar units in the surrounding area. Additionally, this activity will only apply to eight PBV units and a small amount of TBV units that additional costs will be minimal. The simple example below illustrates how approving a higher contract rent for PBV units would generate additional rent revenue with no direct impact to the tenant:

Affordable Non-Voucher 4-bedroom Unit at Valencia Grove Phase II		PBV 4-bedroom Unit at Valencia Grove Phase II	
Contract Rent (LIHTC)	\$2,042	Contract Rent (rent reasonableness)	\$3,625
		Tenant Portion*	\$531
		Housing Assistance Payment (HAP)	\$3,094

\*The tenant portion will be calculated utilizing HACSB's MTW activity #22 – Streamlined Lease Assistance (SLA) program, of which the tenant's rent share is the greatest of 30% of their gross income, the minimum rent, or baseline rent. In the example above, the current average tenant rent portion for a project-based voucher 4-bedroom unit is \$531.

## d. Need Justification for MTW Flexibility

This activity will increase the rental revenue for the site, allowing HACSB to recover funds invested into the redevelopment of Valencia Grove Phase II, ensuring that those funds are available for HACSB to continue its efforts to develop additional affordable housing in San Bernardino County. HACSB requests authority to waive the following statutes and regulations to undertake this proposed activity:

- Attachment C, D(2)b – Rent Policies and Term Limits – Waiving 24 CFR 983 Subpart E – Housing Assistance Payments Contract
- Attachment C, D(2)c – Rent Policies and Term Limits – Waiving 24 CFR 982.507(d)– Rent to owner: Reasonable rent.
- Other statutes and regulations waived under previously approved and currently active HACSB MTW activities.

These authorizations will permit HACSB to approve contract rents for project-based voucher units and tenant based-voucher units at Valencia Grove, Phase II that exceed the contract rent for other unassisted units within the development.

## e. Rent Reform/Term Limit Information

### i. Impact Analysis

1. How the activity will impact household/tenant rent share?

This activity will have no impact on household/tenant rent share. The 104 affordable multifamily unit development, Valencia Grove Phase II, will include eight 4-bedroom PBV units with an approved contract rent of \$3,625 for applicants with incomes under 50% of the Area Median Income (AMI), as established in HACSB's Agreement to Enter into Housing Assistance Payments Contract Agreement (AHAP) for the property. For any tenant-based voucher units leased, the contract rent will be lower of the reasonable rent (based on existing rent reasonableness determination procedures) or HACSB's Local Payment Standard (LPS). For all other affordable unassisted units at the development, the contract rent will be based on the LIHTC rent for the 80% income level minus utility allowance in effect at the time the development begins leasing. The tenant's portion will be calculated utilizing HACSB's MTW Activity #22 – Streamlined Lease Assistance, under which the tenant's rent share is the greatest of 30% of their gross income, the minimum rent, or baseline rent.

2. A description of how the MTW PHA will implement and track rent reform activity and how that process will enable the identification of any unintended consequences/impacts.

This activity will be implemented when construction of Valencia Grove, Phase II is completed, and new households begin to lease at the site. Implementation is anticipated to take place in Fall 2024. In addition to the HUD Standard Metrics required for this activity, HACSB will internally monitor a variety of performance indicators, including but not limited to HAP costs and leasing rates. This information will be reviewed to determine whether the activity is meeting its objective of increasing housing choice for eligible low-income families while HACSB recovers funds invested in the redevelopment of Valencia Grove, Phase II.

3. A numerical analysis detailing the unintended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)

Approval of this activity will not have an impact on household/tenant rent share.

4. A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded.

Please refer to section iii, below.

**ii. Hardship Case Criteria**

Not applicable. This activity will not impact the tenant rent portion; therefore, a hardship case criteria does not apply for the implementation of this activity.

**iii. Description of Annual Reevaluation**

HACSB will annually review the performance of this activity to determine if the activity is meeting its objective of increasing rental revenue so that HACSB may continue its efforts to develop additional affordable housing in San Bernardino County and increase housing choice for eligible low-income families.

**iv. Transition Period**

Not applicable. This activity will only apply to newly developed units at Valencia Grove, Phase II; therefore, there is no impact for existing customers.

## IV. Approved Activities

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### A. Implemented Activities

#### Activity 1: Single-Fund Budget

The flexibility granted under this activity is included in the statutory authorizations granted to MTW agencies. In accordance with HUD guidance, information related to this activity is included in Section V: Administrative.



## Activity 4: Biennial and Triennial Recertifications

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial approval as a pilot program for elderly and disabled households in the Public Housing and Housing Choice Voucher programs with no other adult members and no earned income.
- FY 2012: Modified to expand the scope of the activity to apply to all families in both programs. The expanded initiative was implemented in 2012 with approximately half the households assigned to a biennial schedule. The remaining households were assigned to the biennial schedule in 2013.
- FY 2014: The first complete cycle of biennial certifications was completed in 2014.
- FY 2019: Modified to add triennial recertifications for elderly-only fixed-income households. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021 through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

Current regulations require annual income recertifications for most participants of the Public Housing and Housing Choice Voucher programs. This MTW activity allows HACSB to conduct recertifications of MTW, EHV and VASH households biennially or triennially. Elderly-only fixed-income households are recertified triennially; all other families are recertified biennially. Triennial recertifications for elderly-only fixed-income households began in September of 2019, with triennial recertifications for VASH households beginning in May 2020. EHV participants can request interim recertifications, should the household experience an income reduction.

#### Biennial/Triennial Recertification Process

- HACSB will perform a full recertification to examine household income and composition once every three years for elderly-only fixed-income household, and once every two years for all other households. No PHA-initiated updates will take place during the years between full recertifications.

- An elderly-only fixed-income household is defined as having no members under the age of 57 AND having at least 90 percent of its income from fixed sources.
- This activity modifies the recertification schedule only. Households will continue to be subject to the interim reporting requirements, calculation of income and rent, and other components of their assigned program type (Term-Limited Lease Assistance, Streamlined Lease Assistance, etc.)

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations for this activity:

- HACSB will extend the validity of a family’s most recently completed biennial or triennial recertification by one year. The due date of the family’s next biennial or triennial recertification will be one year from the original due date, and future recertifications will follow the biennial/triennial schedule (taking place two/three years from the date of the extended recertification).

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status

- SS# 4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics CE #5, SS #1, SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual MTW Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. As a result, HACSB does not anticipate that these metrics will reflect an increase in tenant rent share, household income, positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

## v. Planned Significant Changes

None.

## Activity 5: Simplified Income Determination

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial approval as “Local Verification Policies”. Implemented on October 1, 2009.
- FY 2019: Modified to rename this activity and merge the functions of the following previously approved activities:
  - Activity 5 – Local Verification Policies (the original name of this activity)
  - Activity 6 – Elimination of Assets: Originally approved in our FY 2009 Annual MTW Plan and implemented on October 1, 2009. This component was closed out as a separate activity in FY 2019.
  - Activity 9 – Elimination of Earned Income Disallowance: Approved via FY 2009 Initial Annual MTW Plan and effective October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs. This component was closed out as a separate activity in FY 2019.
  - Activity 17 – Local Income Inclusions: Originally approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. The activity was modified through HACSB’s FY 2015 Annual MTW Plan. This component was closed out as a separate activity in FY 2019.
- Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. All components of this activity except the elimination of the Earned Income Disallowance apply to VASH households.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes. This activity applies to EHV customers, with the exception of the exclusion of Earned Income Disallowance.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity includes four components: local verification policies, elimination of assets, elimination of the Earned Income Disallowance, and local policies for income inclusions and exclusions. All components of the activity, except the elimination of the Earned Income Disallowance component, apply to EHV and VASH households. For all MTW households, HACSB uses anticipated income (based on current information) to calculate the household’s annual income during eligibility and recertification for purposes of determining tenant rent and total tenant payment (TTP), where applicable, to be received by the family during the 12-month period following admission or recertification.

This activity has simplified the process for our households and the housing staff, reducing staff time spent on verifications, calculation of assets, processing the Earned Income Disallowance, and related agency costs.

### Verification Policies

The verification standard used by HACSB was modified in FY 2011 to establish the following local verification hierarchy:

1. Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) is the highest standard of verification.
2. Documents provided by the household and observed to be satisfactory to verify income are the second tier of verification.
3. Third-party written verification is requested as the third tier of verification if additional verification is necessary.
4. Third-party oral verification is permitted as the lowest ranking type of income verification.

Applicant verifications may not be more than 120 days old (from the date received) at the time of orientation. For participants, verifications remain valid for six months (180 days) from the date received.

### Elimination of Assets

Assets are fully excluded from the calculation of annual income for the purpose of determining the tenant rent portion. Asset information is verified at initial eligibility for the purpose of determining income eligibility for assistance. Thereafter, information related to assets is not collected or verified and income from assets is not considered as part of the income/rent calculation formula or ongoing program participation.

### Elimination of Earned Income Disallowance

HACSB has eliminated the HUD Mandatory Earned Income Disallowance (EID) from the calculation of total tenant payment. This component does not apply to VASH program participants.

### Local Income Inclusions and Exclusions

HACSB has established local policies to include or exclude certain income sources that are currently excluded or included under regulation. The modifications to the rent calculation are:

- Foster care income is fully included;
- Sanctioned Temporary Assistance to Needy Families (TANF) income, whether due to non-compliance with self-sufficiency requirements, fraud or any other sanction reasons authorized by CALWORKS, except term limits, is fully included;
- Adoption assistance payment income is fully included (effective at each household's first biennial recertification effective on or after October 1, 2015);
- Earned income of full-time students other than the Head of Household, spouse, and co-head of household is fully excluded (effective at each family's first biennial recertification effective on or after October 1, 2015); and
- Student Financial Assistance is fully excluded.

### iii. Planned Non-Significant Changes

None.

#### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution
- CE #5: Increase in Tenant Rent Share

#### v. Planned Significant Changes

None.



## Activity 8: Local Policies for Portability

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The initial implementation of this activity began on October 1, 2009.
- FY 2010: Modified to add a work requirement for portability. The work requirement was implemented on August 1, 2010.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater cost effectiveness in federal expenditures.

Through this activity, HACSB applies the requirements of its ongoing MTW activities to inbound portability participants.

This activity has resulted in significant staff time savings, achieving a reduction in staff hours to process ports-in each year since implementation. All benchmarks for this activity have been fully or partially met since FY 2010.

#### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations change for this activity:

- HACSB temporarily suspended acceptance of Housing Choice Voucher Program ports-in from other housing authorities. HACSB maintained a contact list of the households who expressed interest in porting to San Bernardino County during the temporary suspension and those households were notified when the suspension was lifted effective December 1, 2020.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### **iii. Planned Non-Significant Changes**

None.

### **iv. Planned Changes to Metrics/Data Collection**

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

### **v. Planned Significant Changes**

None.

## Activity 10: Minimum Rent

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The activity was implemented on October 1, 2009, for recertifications of currently served households and on January 1, 2010, for all new families.
- FY 2019: A non-significant modification was made to require households paying the minimum rent to participate in supportive services offered by HACSB. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.
- FY 2023: Modification to reduce or postpone the minimum rent for HACSB developments or programs serving extremely vulnerable populations.

### ii. Description/Update

This activity addresses the MTW statutory objectives to reduce costs and achieve greater effectiveness in federal expenditures, and to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

This activity allows HACSB to increase the minimum rent to \$125 from the current regulatory maximum of \$50 per month for all households in both the Public Housing and Housing Choice Voucher Programs. The activity applies to MTW, EHV and VASH households.

This activity allows HACSB to apply a minimum rent that differs from the regulatory minimum rent.

The minimum rent may be reduced or postponed for HACSB developments or programs serving extremely vulnerable populations. For example, HACSB reduced the minimum rent for all households residing at the Desert Haven and Golden Apartments permanent supportive housing sites for homeless and chronically homeless individuals and families to \$0. The household will pay the applicable Streamlined Lease Assistance (MTW Activity 22) rent, with a minimum rent of \$0. This waiver may be short-term or permanent and will be specified in HACSB's Administrative Plan.

#### Supportive Services Requirement

This activity also permits HACSB to require career-able (non-elderly and non-disabled) households paying the minimum rent to participate in services offered through HACSB's Family Empowerment Services (FES) team. The Head of Household will be required to sign an individual training and services

plan (ITSP) with the primary objective of increasing the household's earned income. This component was approved in HACSB's FY 2019 Annual MTW Plan. However, implementation of this requirement is on hold due to staffing and structural changes within the FES team.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #5: Increase in Tenant Rent Share
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #8: Households Transitioned to Self-Sufficiency

Standard metrics SS #3, SS #4, and SS #8 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to achieve agency cost and staff time savings. HACSB does not anticipate that these metrics will reflect an increase in positive outcomes in employment status, households removed from TANF, or households transitioned to self-sufficiency as a direct result of this activity.

### v. Planned Significant Changes

None.

## Activity 11: Local Project-Based Voucher Program

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2010: Clarified components of the activity through FY 2010 Annual MTW Plan, Amendment 3. Implemented September 2010.
- FY 2015: Modification proposed through our FY 2015 Plan, Amendment 1B, but not approved by HUD. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 MTW Plan.
- FY 2018: Modification to expand unit types eligible for project-based vouchers and add a work and/or supportive services requirement.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes. A modification to allow HACSB to apply alternative occupancy standards in special circumstances was included in our FY 2019 Annual MTW Plan, Amendment 1.
- FY 2022: Modification to allow all project-based voucher (PBV) units included under a single contract to be grouped as a single building for the purpose of determining the number of inspections to be performed.
- FY 2023: Modification to allow all PBV units to remain on the PBV contract even if the unit is not leased or no housing assistance payment (HAP) is made for more than 180 days.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

HACSB has implemented a local Project-Based Voucher (PBV) program to increase the availability of quality housing units. The expansion of our housing authority and/or our affiliate nonprofit owned housing stock will allow us to continue to reinvest net income into the acquisition of additional affordable housing units. The flexibilities included under this activity are:

- Project-based assistance at properties owned by HACSB or an affiliate of HACSB that are not Public Housing.
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest that meet existing Housing Quality Standards, or any standards developed by HACSB through a MTW activity, and that are owned by non-profit and for-profit housing entities.
- Alternate standards for determining the location of existing, newly constructed, or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement.
- Up to 100% percent of units in any development may be project-based.

- Up to 30% (including RAD-PBV units) of HACSB's total MTW baseline number of units may be allocated for PBV.
- PBV will be allocated to all Public Housing units approved for disposition other than 27 Shelter Plus Care units to be rehabilitated in conjunction with the County Department of Behavioral Health (308 PBV units).
- Households residing in PBV units will not have automatic priority to receive tenant-based vouchers after one year, but instead will have such a priority after two years (this component does not apply to RAD PBV households).
- A local PBV HAP contract which modifies the terms and conditions of the HAP contract, including the ability to execute PBV HAP contracts for groupings of non-contiguous scattered-site properties and to contract for a total number of units by bedroom size within a development rather than for specific units.
- HACSB will project-base assistance at properties owned by HACSB or HACSB affiliate that are not Public Housing without a competitive process.
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest, and that are owned by non-profit and/or for-profit housing entities. Such units must meet existing Housing Quality Standards (HQS) or HACSB-local HQS.
- Alternate standards for determining the location of existing newly constructed or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement.
- An over-housed household residing in a Public Housing unit that is disposed of and converted to a project-based voucher may remain in its unit and HACSB will subsidize the household based on the size of the unit, not the qualifying voucher size.
- HACSB may require an under-housed household residing in a Public Housing unit that is disposed of and converted to a project-based voucher to move with a voucher for the number of bedrooms for which the household qualifies.
- For a unit other than former Public Housing units, HACSB may designate the unit as a PBV unit and allow an in-place household for which the unit is wrong-sized to remain in occupancy for up to one year, if the owner agrees to accept a PBV contract rent that does not exceed the HACSB subsidy standard for the household for the initial term of the lease.
- Initial contract rent for units owned by HACSB as defined in the PBV regulations may be determined using an HACSB market study that will consider local rental submarkets, in lieu of the requirement to use an independent entity with rents based on an appraisal by a state-certified appraiser. This flexibility is applied to the first two phases of the Waterman Gardens public housing revitalization project, where single-fund flexibility is utilized to increase RAD contract rents to match local market rent levels, thereby allowing us to generate more private debt and equity necessary for new construction. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three).

- The rents for Rental Assistance Demonstration (RAD) units will equal the maximum specified under the RAD Notice. This component does not apply to the third and final phase of the Waterman Gardens RAD conversion and redevelopment (please see Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments for more information about the rent and subsidy calculations applicable to phase three).
- HACSB may project-base vouchers for unit types which are not allowable under traditional regulatory PBV. The types of housing which may be assisted through PBV include the following:
  - Shared housing (up to one person per bedroom);
  - Units on the grounds of a penal, reformatory, medical, mental health, or similar public or private institution;
  - Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care;
  - Manufactured homes;
  - Transitional housing;
  - Single-room occupancy;
  - Congregate housing;
  - Other housing types as needed.
- Where appropriate, HACSB will partner with universities, state and local government, and other stakeholders to develop housing and service delivery programs which leverage HACSB and partner resources. Where appropriate and feasible, programs will include both housing and related health care, education, job preparedness, and/or other necessary supportive services for individuals assisted through the programs.
  - To ensure that assisted households receiving on-site supportive services through an HACSB partner continue to reside at the location where the services are provided, HACSB may not provide a tenant-based voucher upon completion of the initial two-year term of assistance. Assisted households will be notified at move-in whether they will be eligible to receive a tenant-based voucher.
- HACSB will allow all PBV units included under a single contract to be grouped as a single building for the purpose of determining the number of inspections to be performed. Currently, regulations require that 20% of the units in each building in a project be inspected annually or biennially. For scattered site projects and those that include multiple buildings on one site, the inspection requirement results in HACSB inspecting more than 20% of the total units under PBV contract. For example, a PBV contract that includes ten duplex buildings (20 total PBV units) would currently require one inspection per duplex (ten inspections). Under this modification, HACSB would instead inspect 20% of the 20 total units (4 inspections).
- HACSB may allow all PBV units to remain on the PBV contract even if the unit is not leased or no housing assistance payment (HAP) is made for more than 180 days. During the term of the HAP contract, HACSB will not temporarily remove units from the contract that are vacant for over 120 days or in which no HAP has been paid for 180 days. Unit substitutions may occur when possible. HACSB may permanently remove units during the term of the HAP contract if the owner has failed to make good faith efforts to fill vacancies or is in violation of Housing Quality Standards. Regulations currently require units to be removed from the PBV contract if no HAP has been paid for more than 180 days. This modification will allow an increase in accessibility to housing for some of our most vulnerable population, such as No Child Left Unsheltered



(NCLU) customers, by allowing HACSB to keep units under PBV contract that will in turn allow rapid housing options for these customers, rather than removing and re-adding units numerous times through a time-consuming process and the PBV unit remaining vacant during that process.

#### Rent Reasonableness, HAP, and Vacancy Payments (Shared Housing Units)

HACSB will use its Local Payment Standard (LPS) to determine rent reasonableness and maximum HAP. If a shared housing unit is not fully occupied, HACSB will pay the full HAP for the unit for up to sixty days. After sixty days, the HAP will be prorated to reflect the percentage of occupied bedrooms.

#### Additional Requirements

Our approved FY 2018 Annual MTW Plan included the addition of a requirement for the PBV project developer/manager to administer a work requirement and/or supportive services program for some new project-based voucher contract awards. This component has not yet been implemented for any PBV site, but HACSB anticipates that it will be used for future PBV awards.

The work and/or supportive services requirement will apply only if the number of PBV units exceeds a reasonable number or percentage of the total units in the development. The requirement will not apply to developments where conflicting regulation or law exists. HACSB intends to apply this proposed modification only to new PBV awards. A work requirement and/or supportive services requirement would not be applied to existing PBV contracts unless agreed upon by the owner.

When a PBV award includes a work requirement, the work requirement will apply only to non-elderly and non-disabled households residing in PBV units. Adult household members will be required to participate in work-related activities for a minimum of fifteen hours per week. Work-related activities shall include activities removing barriers to gainful employment, activities leading to gainful employment, and employment. HACSB will require the developer/manager to provide supportive services to these households. Supportive services may include, but are not limited to, job skills/employment coaching and job search services, life skills classes, and other services designed to help households meet the work requirement.

For some PBV awards, HACSB may include a supportive services requirement only. Supportive services may include, but are not limited to, educational and employment services, life skills classes, assistance accessing community resources, and other services.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

- HC #4: Displacement Prevention
- Local Metric: Units of Project-Based Voucher Assistance Added to the HACSB Portfolio

#### v. Planned Significant Changes

None.

## Activity 12: Local Payment Standards and Alternative Flat Rents

### i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2011: Implemented on July 1, 2011, for all new lease ups and recertifications.
- FY 2012: Modified to use the maximum subsidy as determined through HACSB's annual market rent study as the guideline in determining the contract rent for voucher units.
- FY 2015: Modification proposed but not approved via Amendment 1B to our FY 2015 Plan. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 Annual MTW Plan.
- FY 2017: Modified to apply Local Payment Standards as the maximum flat rent for Public Housing units.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.
- FY 2023: Authorization to conduct mid-year revisions to the Local Payment Standard (LPS) amounts, if necessary.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

The activity applies to MTW, EHV, and VASH households.

This MTW activity allows HACSB to conduct a market assessment to identify submarket areas and develop Local Payment Standards (LPS) for those submarket areas in lieu of the HUD-prescribed Fair Market Rents (FMR). HACSB may conduct mid-year revisions to the Local Payment Standard (LPS) amounts if internal analysis of rental market conditions indicates that a mid-year revision is necessary to support leasing goals. The LPS reflect the diverse rental submarkets that exist across the geographically vast and diverse San Bernardino County.

Our FY 2017 Annual MTW Plan expanded the use of LPS to replace the HUD-published FMRs as the indicator for establishing flat rents in the HACSB public housing portfolio. The annually established Local Payment Standards by submarket and bedroom size are used to determine the maximum

flat rent that can be charged to Public Housing residents. The actual flat rent may fall below the LPS based on a comparison of like units in the same area consistent with standard industry rent comparable practices. If an annual review of the Local Payment Standards indicates an increase or decrease of more than 10% from the current rate, the Public Housing flat rent will be re-assessed. The new flat rents will be applied in accordance with the rent increase process as detailed in our Admissions and Continued Occupancy Policy and related Codes of Federal regulation that govern our Public Housing program.

Since implementation, this activity has shown a significant improvement in the number of households able to move to areas of opportunity. We have met or exceeded the benchmarks for our local metric, which measures the number of households residing in the two submarkets with the highest poverty and minority concentration. This change reflects an increase in the number of households that have relocated out of these submarkets into other areas of greater opportunity. HACSB anticipates that the number of households relocating to areas of greater opportunity will continue as a result of this activity.

To eliminate barriers for EHV participants, we will use a combination of HACSB Local Payment Standards and Payment Standards for traditional regulatory assistance for EHV participants. HACSB will group nine Local Payment Standard submarkets into three regions. Generally, payment standards for EHV are set between 90 – 120% of FMRs. However, if any of the MTW payment standards within the region exceed 120% of FMR, we will apply the highest MTW submarket payment standard to the entire region.

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took the steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations change for this activity:

- The 2020 annual review and update to the Local Payment Standards was delayed due to the limited availability of a third-party consultant to perform the market assessment. Additionally, the availability of market data for vacant units was limited by the extremely low vacancy rates, which ranged from two to four percent in different areas of the County.

- On January 20, 2022, HACSB received authorization for a temporary waiver through Notice PIH 2021-34 to increase payment standards up to 120% of HUD published FMR to support HACSB's leasing efforts. Temporary Local Payment Standards were implemented using this waiver authority effective March 9, 2022, and expired December 1, 2022.

Emergency operations have ended, and normal operations have resumed. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will continue to report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #8: Households Transitioned to Self-Sufficiency
- HC #5: Increase in Resident Mobility
- Local Metric: Average HAP Cost
- Local Metric: Households Able to Move from Areas of Poverty and/or Minority Concentration.

### v. Planned Significant Changes

None.

## Activity 13: Local Inspection Policies

### i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval. Implemented on May 1, 2011.
- FY 2015: Modified to expand biennial inspections to all MTW units.
- FY 2016 and FY 2017: Expanded biennial inspections implemented across all MTW units.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity allowed HACSB to develop and implement local inspection standards for the Housing Choice Voucher (HCV) program that have increased operational efficiencies and ensured better housing options for low-income households. All MTW, VASH, and EHV units are inspected biennially through this activity.

In FY 2013, HACSB completely outsourced our HCV inspections. This change resulted in additional staff time and cost savings. We continue to perform quality checks of our portfolio for accuracy, inspection standards, and customer satisfaction. We anticipate that the cost and time savings will continue in future years.

A modification to this activity was approved via our FY 2015 Annual MTW Plan. The percentage of units that met our quality standards to qualify for biennial inspections was well above the expected outcome. As a result, the property rating system used to determine the frequency of inspections for each unit was eliminated. Assisted units that were previously inspected annually were moved to a biennial inspection schedule, with 50% of those units inspected in FY 2016 and the remaining 50% inspected in FY 2017. No change was made to HACSB's enhanced local inspection standards.

#### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement temporary change(s) to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations changes for this activity:

- HACSB extended the validity of a household’s most recently completed biennial HQS inspection by one year. The due date of the household’s next biennial HQS inspection was reset to one year from the original due date.
- HACSB deferred in-person initial HQS inspections. While this modification was in place, HACSB accepted self-certification by the household and property owner/manager that the unit met all HQS requirements in order to allow the household to move in without delay. In some circumstances, HACSB required photographs to accompany the self-certification for some HQS components.
- Inspections were resumed effective March 15, 2021, and HACSB will conduct an in-person HQS inspection to confirm that units meets HQS requirements. Deferred initial HQS inspections are prioritized for processing. In the event the unit does not pass the in-person HQS inspection, HACSB will follow the same policies and procedures applicable to failed biennial inspections.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution

Standard metrics CE #2 and CE #3 were added in HACSB’s 2015 Annual Plan per HUD’s request. The objective of the activity is to achieve agency cost savings. As a result, HACSB does not anticipate that these metrics will reflect a decrease in error rates related to this task or an increase in staff time savings as a direct result of this activity.



## v. Planned Significant Changes

None.

## Activity 14: Local Asset Management Program

### i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

The First Amendment to the Standard MTW agreement executed on May 21, 2009, allowed HACSB to design and implement a local asset management program. As per our FY 2012 MTW Annual Plan and in accordance with the federal Office of Management and Budget (OMB) Circular A-87, we elected to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. Detailed information is provided in the appendices to this Plan.

HACSB intends to sunset use of the Local Asset Management Program (LAMP) after the Los Olivos Public Housing site is converted through the HUD Rental Assistance Demonstration (RAD) program.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None.

### v. Planned Significant Changes

None.

## Activity 18: Property Management Innovation

### i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures.

This activity allowed HACSB to develop a property management innovation program that reflects private sector property management principles. This activity applies to all Public Housing units, including units converted under the Rental Assistance Demonstration (RAD) program. The objective is to implement policies used in the private sector to decrease management costs, improve the quality of our units, and assist our tenants in becoming familiar with private sector property management principles. All residents signed a new lease which incorporated all the changes proposed in the activity. The lease reflected the following changes approved through our FY 2011 plan:

- a. 3-Day Notice to Pay or Quit (previous policy was 14 days). This component was eliminated due to the RAD conversion of our Public Housing portfolio.
- b. NSF fees of \$25.00 for first and \$35 for additional items (previous policy was \$25.00).
- c. Late fees increased from \$20 to \$50.
- d. Security deposits equal to one month's market rent (current security deposit charged is \$500.00)
- e. Implement a holding deposit of \$200.00.
- f. Agency will choose lower of flat rent or 30% income rent for residents.
- g. Grievance Process – Previous two step process was replaced with a single on-site settlement conference with staff for timely and effective resolutions to issues. This component was eliminated due to the RAD conversion of our Public Housing portfolio.

The activity has resulted in cost savings and administrative efficiencies gained from the streamlined grievance process as well as the reduction in arbitration costs.

#### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations change for this activity:

- HACSB will use remote meeting options whenever possible for actions within this activity which require a meeting between HACSB employees and assisted households, such as the modified grievance process (settlement conference).

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings

### v. Planned Significant Changes

None.

## Activity 20: Term-Limited Lease Assistance

### i. Plan Year Approved, Implemented, Amended

- FY 2011: Initial approval. Implemented on January 1, 2012. Note: This activity was originally proposed as activity 21 under the title “Term Limits”. It was renumbered as activity 20 with our FY 2012 Plan.
- FY 2013: Renamed from “Term Limits” to “Five-Year Lease Assistance.”
- FY 2015: Modified to include potential termination from the program for noncompliance with the household’s Supportive Services Agreement.
- FY 2016: Modified to include an intake hardship exemption for extremely low-income and Triage Step 3 households and to expand the end-of-term hardship exemption. This modification was not implemented.
- FY 2017: Modified to include income-based subsidy calculation for new households joining the program, requirement for families to lease a unit with no more than one bedroom more or less than their voucher size, a post-assistance tracking survey process, approval to implement incentives for families to move to areas of opportunity, and expanded applicability to include career-able ports-in, project-based households exercising mobility, and non-legacy RAD households exercising mobility.
- FY 2018: Modified to include right-size unit restriction, limitation on the approvable amount of rent increases, and a limitation on the amount of subsidy paid on behalf of over-housed households. Title changed to Term-Limited Lease Assistance.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

### ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

The goal of this activity is to enable the households we serve to focus on self-sufficiency efforts while we assist them with their housing needs for a limited term. Households served through this activity are provided with up to five years of housing assistance and supportive services, with the possibility for extension through a hardship exception that may provide up to two years of additional assistance.

This activity applies to new non-elderly and non-disabled households admitted to the Housing Choice Voucher program from HACSB’s waiting list, porting in from another jurisdiction, or exercising mobility from HACSB project-based voucher sites. Currently assisted households who are selected from the wait list during their term of participation in the program may continue their current term of participation but will not be provided a new or extended term of assistance. In such circumstances, the application will be removed from the wait list.

The activity is now in its twelfth year. Since implementation, HACSB has partnered with Loma Linda University to conduct a longitudinal study to monitor the families served through this activity, tracking their goals and accomplishments. The study has included more than 2,300 households to date and reports positive outcomes, including:

- Earned income for households in the program increases by an average of 45.5% during their five-year term of assistance, and the number of households with earned income nearly doubles from 48% at the start of the five-year term to 86% by the fifth year;
- Full-time employment increased by 25%;
- Households' assistance income tends to decrease in the second year of the program, but is quickly replaced by increased earned income.

We will continue to work with our Loma Linda University partners to evaluate the households' progress and challenges as well as residual impacts the program has on families after they exit housing assistance.

#### Subsidy Calculation:

**Households participating in the activity before November 1, 2017:** the housing subsidy is set at 50% of the applicable payment standard for the unit selected by the household.

**Households joining the activity on or after November 1, 2017:** the subsidy calculation mirrors the Streamlined Fixed Assistance Program for New Non-Elderly/Non-Disabled Households. Under that calculation, the household's rent share is the greatest of 30% of their gross income, the minimum rent, or baseline rent, for the duration of assistance.

#### Subsidy Limitation:

This component has not been implemented as of May 2023. HACSB is authorized to apply a subsidy limitation to households participating in the TLA activity. To encourage households to select units that are appropriately sized and most likely to be affordable to the household when coupled with the rental subsidy, HACSB will apply a subsidy limitation to over-housed households. Over-housed households are those who have voluntarily selected and leased a unit that is larger than their voucher size. For example, a household with a two-bedroom voucher who has chosen to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the applicable HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the household, which results in a greater household rent share than if the household had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount. Through this activity, HACSB will limit the maximum subsidy for over-housed households to the average subsidy rate for households that are not over-housed with the same size voucher.

HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households. We continue to monitor and balance program costs with leasing success to determine if implementation of this component will be needed.

### Supportive Services:

During the term of assistance, HACSB also provides supportive services to the household through its Family Empowerment Services (FES) department (formerly known as Career Development Initiatives). Households are required to meet with their FES caseworker at least annually to review their action plan and progress. Services provided to households through the FES team include:

- Needs assessment at intake to identify barriers and areas of need, such as education, job training, childcare, transportation, and other areas;
- Development of an individualized action plan to overcome barriers and needs as identified;
- Access to other resources designed to provide the household with meaningful support and tools to enhance the household's chances for success.

### Mobility:

For households who initially leased under this activity prior to September 21, 2015, and who port to another jurisdiction during the term of assistance, the term limit will continue to apply unless the household is absorbed by the receiving agency. For households who initially lease under this program on or after September 21, 2015, the administration of the voucher will be in accordance with the receiving PHA's policies in accordance with the Federal Register notice published September 21, 2015.

### Hardship Exemptions:

HACSB recognizes that the expiration of assistance may present a hardship for some households, and has developed hardship exemptions in four categories:

- **Completion of Self-Sufficiency Activity:** to allow the household to complete an educational, job training, or other approved self-sufficiency activity.
- **Unforeseen and Involuntary Loss of Income**
- **Near-Elderly Household:** if the head of household will reach age 62 no later than six (6) months after the end of term or any applicable extension, the household may request a transfer to HACSB's Streamlined Lease Assistance for Elderly/Disabled Families.
- **Other Reasons:** this category allows HACSB to approve an extension of assistance for rare or unusual circumstances, such as PHA error.

To be eligible for a hardship exemption, the household must have complied with all requirements of the program, including the Supportive Services Agreement. Any approved extension shall not exceed two years and shall be approved in increments of six or twelve months as determined by HACSB.

### Total Term:

The total term of assistance under the program, including any approved hardship exemption, shall not exceed seven years. Note: This total term limit may be exceeded for households whose end of term was scheduled to take place between April 1, 2020, and September 30, 2020, and who received an automatic six-month extension of assistance through HACSB's emergency operations in response to the COVID-19 pandemic.



#### Unit Size Limitation:

HACSB may require households admitted to or moving to a new unit under the Term-Limited Assistance (TLA) Program to select a unit whose number of bedrooms is not greater than their voucher size. For example, a household with a two-bedroom voucher may not lease a three-bedroom or larger unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed households are also more costly to house than households in right-sized units. HACSB implemented this requirement in July 2021, but has withdrawn the requirement due to scarcity of available housing units. We continue to monitor and balance program costs with leasing success to determine if re-implementation of the requirement is needed. We anticipate that we will re-implement the requirement in the future.

#### Incentive to Move to Areas of High Opportunity:

HACSB may provide incentive to household in the term-limited lease assistance program to move to areas of high opportunity, as identified by HACSB. This component has not been implemented as of May 2023. We continue to monitor and balance program costs with leasing success to determine if implementation of this component is appropriate.

#### Post-Assistance Tracking Incentive:

HACSB has partnered with Loma Linda University (LLU) to evaluate Term-Limited Lease Assistance households at exit and annually for two years after assistance has concluded. Information is collected through a questionnaire that is returned directly to LLU. Although participation in the survey is voluntary, a monetary incentive is provided for households completing the survey. Households receive the incentive payment only upon completion of each survey. Feedback obtained through the exit study helps HACSB to understand the household perspective and experience in the TLA program. The majority of households participating in the study reported a positive experience in the program and that participating was a resource to them on their pathway to self-sufficiency. Benefits noted by the households include the ability to save money, to stabilize their housing situation, and to experience social mobility. Households also provide helpful suggestions for improving the program, including increasing household accountability and supports available to households.

#### Rent Increase Limitation:

Through its 2018 Annual MTW Plan HACSB was granted authorization to limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example: if the average value of approved rent increases is 10% of the previous contract rent, this modification would permit HACSB to cap the amount of any proposed rent increase to less than 10% of the previous contract rent. This modification provides HACSB with a mechanism to slow the HAP cost increases resulting from continued rent increases. However, this component has not yet been implemented in part due to continued scarcity of available housing units. HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households, and we continue to monitor leasing success and program costs to determine if implementation of this component is appropriate.

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. As a result, HACSB implemented the emergency operations changes for this activity:

- To the extent possible, HACSB will conduct annual meetings between TLA participants and their FES caseworker by telephone or using virtual meeting technology. If this is not possible, HACSB will defer the annual meetings until it is safe, feasible, and practical to conduct them in accordance with normal procedures;
- The end of term (EOT) for any TLA participant with an EOT scheduled to occur between April 1, 2020, and September 30, 2020, was delayed by six months.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #5: Households Assisted by Services that Increase Self-Sufficiency
- SS #8: Households Transitioned to Self-Sufficiency

## v. Planned Significant Changes

None.

## Activity 22: Streamlined Lease Assistance

### i. Plan Year Approved, Implemented, Amended

- FY 2013: Initial approval.
- FY 2015: Implemented February 1, 2015.
- FY 2016: Modified to add “Streamlined Fixed Lease Assistance for New Non-Elderly/Non-Disabled Households”.
- FY 2017: Modified to add a unit size limitation for tenant-based voucher programs.
- FY 2018: Modified the rent tiers for career-able families currently participating in the Streamlined Tiered Lease Assistance program from 21/24/27/30% to 30/33/36%.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

### ii. Description/Update

This activity addresses the MTW statutory objective to reduce costs and achieve greater effectiveness in federal expenditures and the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

Through this activity, HACSB has implemented an alternative subsidy/rent schedule for households participating in the Housing Choice Voucher and Public Housing programs. The activity applies to:

- Public Housing: all current and new households;
- Housing Choice Voucher: all current and new households, except those admitted to the Term-Limited Lease Assistance Program before November 1, 2017.

The rent for households in the Streamlined Lease Assistance (SLA) program is calculated based on a percentage of gross annual income. A minimum rent and baseline rent also apply. The rent percentages were established based on analysis that included deductions and allowances permitted under traditional program regulations, and therefore no deductions or allowances are applied to the calculated rent amount. Households participate in either fixed assistance or tiered assistance, based upon family type. Interim recertifications for changes in household income are not performed except under the hardship exemption procedures for this activity.

#### Fixed Assistance Program for Elderly/Disabled Households:

**Households admitted prior to January 1, 2019:** The household’s rent share Total Tenant Payment (TTP) is the greatest of 24% of their gross income, the minimum rent, or baseline rent.

This rent calculation will be applied for Moving On Strategy households (activity #29) when that activity is implemented. No other households are being, or are anticipated to be, enrolled under this rent calculation.

**Households admitted on or after January 1, 2019:** The household’s rent share TTP is the greatest of 30% of their gross income, the minimum rent, or baseline rent. This component was implemented for new households briefed on or after January 1, 2019.

**Tiered Assistance Program for Non-Elderly/Non-Disabled Households:**

This component utilizes a tiered schedule to calculate the household rent share (TTP). Families enter at Tier 1 and move to the next tier at each subsequent biennial recertification.

Tier 1: The household’s rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent.

Tier 2: The household’s rent share (TTP) is the greatest of 33% of their gross income, the HACSB minimum rent, or baseline rent.

Tier 3: The household’s rent share (TTP) is the greatest of 36% of their gross income, the HACSB minimum rent, or baseline rent.

The baseline rent for each household is the set at their highest household rent share during participation in this activity. Future rent amounts may never fall below the baseline rent without a hardship exemption. For example:

<u>At Admission</u>		<u>First Biennial Recertification</u>	
Household Monthly Gross Income:	\$1,000	Household Monthly Gross Income:	\$900
Tier 2 Calculated Rent (30%):	\$300 ← Household Rent Share	Tier 2 Calculated Rent (33%):	\$297
HACSB Minimum Rent:	\$125	HACSB Minimum Rent:	\$125
Baseline Rent:	N/A	Baseline Rent (Highest Prev. Rent):	\$300 ← household Rent Share

If the calculated rent amount exceeds the ceiling rent for Public Housing or the contract rent for Housing Choice Voucher households, the lesser of the calculated TTP or rent amount is applied as the household’s rent share.

This component previously utilized four rent tiers which set the household’s rent share at 21%/24%/27%/30% of gross income, the minimum rent, or baseline rent. The rent tier structure was changed to the current three-tier structure through our FY 2018 Annual MTW Plan. Beginning February 1, 2018, all households were moved from their current tier to the new Tier 1 (30%) and received an automatic six-month hardship exemption which delayed any change in their rent portion. All households in the program at the time of the revision and those admitted since that time have remained at the 30% rent tier. HACSB intends to implement the additional rent tiers of 33% and 36% only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households. We continue to monitor program costs and households rent burden to determine if implementation of the additional rent tiers is appropriate.

#### Unit Size Limitation (Tenant-Based Voucher Programs Only):

HACSB may require households admitted to or moving to a new unit under the Term-Limited Assistance (TLA) Program to select a unit whose number of bedrooms is not greater than their voucher size. For example, a household with a two-bedroom voucher may not lease a three-bedroom or larger unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed households are also more costly to house than households in right-sized units. HACSB implemented this requirement in July 2021, but has withdrawn the requirement due to scarcity of available housing units. We continue to monitor and balance program costs with leasing success to determine if re-implementation of the requirement is needed. We anticipate that we will re-implement the requirement in the future.

#### Subsidy Limitation:

This component is on hold and has not been implemented as of May 2023. HACSB is authorized to apply a subsidy limitation to households participating in the SLA activity. To encourage households to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB intends to implement a subsidy limitation for over-housed households. These are households that have voluntarily selected and leased a unit that is larger than their voucher size. For example, a household with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the household, which results in a greater family rent share than if the household had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount of HACSB's Local Payment Standard. Through this component, HACSB will limit the maximum subsidy for over-housed households to the average subsidy rate for households that are not over-housed with the same size voucher.

HACSB intends to implement this flexibility only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households. We continue to monitor and balance program costs with leasing success to determine if implementation of this component will be needed.

#### Rent Increase Limitation (voucher programs only):

This component is on hold and has not been implemented as of May 2023. HACSB is authorized to limit the value of approvable rent increases to an amount less than the average value of previously approved rent increases. For example, the average value of rent increases approved in FY 2016 was 10% of the previous contract rent. Through this activity HACSB would cap the rent increase at a value less than 10% of the previous contract rent.

HACSB intends to implement this component only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households, and we continue to monitor leasing success and program costs to determine if implementation of this component is appropriate.

### Hardship Exemptions:

HACSB recognizes that under some circumstances, households may experience a hardship that makes it challenging to pay the applicable rent under the Streamlined Lease Assistance Program and has developed permanent and temporary hardship exemptions.

#### Permanent Hardship Exemptions:

- Death of a household member with income;
- Any income-earning member of the assisted household no longer remains in the unit;
- An elderly or disabled household member experiences a permanent and complete loss of income;
- Unforeseen and involuntary permanent loss of income for a household member under the age of 18.

#### Temporary Hardship Exemptions:

- Unforeseen involuntary loss of employment; or unforeseen complete loss of income due to a major illness as determined by a medical professional.
- Significant medical expenses over \$2,500 for single medical even for Streamlined Fixed households only.
- Unforeseen involuntary permanent loss of income for an adult household member is attending high school.

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary changes to this activity (“emergency operations”) to ensure continuity of operations to the extent possible and practical.

These and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic, which is ongoing at the time of this writing. The pandemic has created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), “stay-at-home” Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB has taken steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. As a result, HACSB implemented the following emergency operations changes for this activity:

- SLA households experiencing a significant loss of income due to the current crisis may be approved for a hardship exemption. This new hardship exemption category will follow the application, review, and approval policies and procedures currently in place for other hardship categories;



- Processing of interim recertifications (to the extent that HACSB processes interim recertifications for households served through the Moving To Work demonstration), with the exception of interims processed for an approved hardship exemption, will be deferred to the earliest practical and feasible date.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #1: Agency Cost Savings
- CE #2: Staff Time Savings
- CE #3: Decrease in Error Rate of Task Execution
- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS #7: Increase in Tenant Rent Share
- SS #8: Households Transitioned to Self-Sufficiency

### v. Planned Significant Changes

None.

## Activity 23: No Child Left Unsheltered

### i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial Approval through HACSB's FY 2014 Annual MTW Plan. Implemented on April 1, 2015.
- FY 2015: Modified to expand program eligibility criteria.
- FY 2018: Modified to add twenty tenant-based vouchers for the foster care component.
- FY 2019: Modified through HACSB's FY 2019 Annual MTW Plan, Amendment 1, to add an automatic transition to HACSB's TLA or SLA activity after two years of participation in NCLU for families newly participating in the activity.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.

### ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

The No Child Left Unsheltered (NCLU) initiative aims to end homelessness of unsheltered families with children in San Bernardino County, with special attention to the education and well-being of the children and overall stabilization of the family. NCLU will provide housing assistance through the Housing Choice Voucher program or Affordable Housing program coupled with supportive services.

Through this activity, HACSB has set aside forty (40) project-based vouchers and twenty (20) tenant-based vouchers to be made available to eligible low-income unsheltered households, including:

- Families with children (under 18 years of age) who are unsheltered at the time of application but do not otherwise meet HUD's definition of chronically homeless.
- Young adults participating in the San Bernardino County Department of Children and Family Services Foster Care Aftercare program.

HACSB has partnered with a variety of local community service providers, including the school system, to identify families, particularly those with school-age children, who are unsheltered. Families are referred to NCLU through the county-wide Coordinated Entry System (CES). Referred families may be admitted as a special admission or placed onto a waiting list with a preference specifically for this program. Participating families receive supportive services through HACSB partners, including the San Bernardino County Department of Behavioral Health (DBH).

#### Family Rent Portion and Rental Subsidy Calculation

The family rent portion and rental subsidy are calculated using the Streamlined Lease Assistance (activity 22) methodology.

### Transition to Other HACSB Housing Programs

Our FY 2019 Annual MTW Plan, Amendment 1, included a modification to this activity to automatically transition eligible families to another HACSB housing program after two years of participation in NCLU. Career-able households will transition to the Term-Limited Lease Assistance (TLA) program and elderly/disabled households will transition to Streamlined Lease Assistance (SLA). This modification applies to new NCLU families admitted on or after October 1, 2019. Implementation of the transition has been temporarily delayed due to the staffing impacts of the COVID-19 pandemic, and HACSB anticipates transitioning households subject to the two-year transition between October 2021 and September 2022 no sooner than their third year of participation in the NCLU program.

### Foster Care Component

Through our FY 2018 Annual MTW Plan, we modified this activity to add twenty (20) units to allow participation by young adults participating in the Department of Children and Family Services Foster Care Aftercare program. Services will target low-income young adults age 18-21 in the Aftercare program who are in need of housing support to transition to stable independent living. Individuals in the Aftercare program receive only limited services through the Foster Care program and are ineligible for housing support through the Foster Care program. Assistance under this component will be subject to the availability of funds. To be eligible for housing support through this component of the NCLU program, the household must:

- Be referred by the San Bernardino County department of Children and Family Services; and
- Be a low-income family as defined by HUD; and
- Meet HACSB's criminal history background screening requirements; and
- Be an active participant in the Aftercare program.

HACSB anticipates that the individuals served through this program will be primarily single individuals but may also include families with one or more dependent children.

Through this component, HACSB will provide each eligible family up to three years of housing support through the Housing Choice Voucher program. The term of support will coincide with the family's enrollment in the Aftercare program. Additionally, the family will be required to engage in supportive services through HACSB's Family Empowerment Services (FES) department and to complete an Individual Training and Services Plan. To ensure that services provided by the Foster Care program and HACSB's FES department continue to be accessed during the term of assistance, the family may not exercise portability or mobility.

The family may request an extension of assistance of up to one year beyond their participation in the Foster Care Aftercare program. HACSB will apply the same hardship eligibility criteria and approval procedures as established for the Term-Limited Lease Assistance program.

HACSB is currently focusing on leasing households in this demographic category into the Family Unification program. While households are not being enrolled into this component at this time, we will keep the component active for future use.

### PBV Unit Designation

In March 2015, the HACSB Housing Commission and Board of Governors approved the award of the 40 project-based voucher units reserved for this activity to units within the HACSB-owned and HACSB-affiliated non-profit housing stock. These contracts were awarded through a non-competitive process authorized under HACSB's Local Project-Based Voucher program (activity #11). Families housed through this activity typically have significant challenges in locating housing through the traditional tenant-based voucher program. This award gives HACSB, as the property owner, the ability to house NCLU families more quickly and with more flexibility than in the traditional tenant-based voucher program.

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), "stay-at-home" Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. As a result, HACSB implemented the following emergency operations change for this activity:

- Supportive services provided to NCLU families may be reduced and/or deferred based on the availability and ability of HACSB staff and partners to provide those services.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- CE #4: Increase in Resources Leveraged
- SS #8: Households Transitioned to Self-Sufficiency
- HC #3: Decrease in Wait List Time

- HC #7: Households Assisted by Services that Increase Housing Choice
- Local Metric: Households Housed through This Activity

#### v. Planned Significant Changes

None.

## Activity 24: Transition for Over-Income Public Housing and Housing Choice Voucher Families

### i. Plan Year Approved, Implemented, Amended

- FY 2014: Initial approval. Implemented on April 1, 2015.
- FY 2015: Modified to exclude current participants of our Family Self-Sufficiency program.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Modified to exclude Term-Limited Lease Assistance participants.

### ii. Description/Update

This activity addresses the MTW statutory objective to give incentives to families with children whose head of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient.

In an effort to create more housing opportunities for families on our Public Housing and Housing Choice Voucher waiting lists, and in recognition of certain households attaining self-sufficiency, HACSB implemented this activity to transition households who have an annual income which exceeds 80% of area median income (“over-income”) off of housing assistance. This activity applies to the Public Housing program, Tenant-Based Housing Choice Voucher program, and Project-Based Voucher program.

Through this activity, over-income households will be given a six-month transition period. After the six-month transition period, households will transition to receiving no housing assistance from HACSB. Public Housing and Project-Based Voucher households will be required to move, and HCV households will have the option of remaining with their current landlord with no assistance or locating alternate housing.

Elderly/disabled households and participants of the Family Self-Sufficiency (FSS) and Homeownership programs are exempt from this activity. The transition period begins for existing households identified as over-income on April 1, 2015, and at interim or recertification for households that become over-income after April 1, 2015. TLA participant households are also exempted from this activity. TLA households have a similar anticipated self-sufficiency trajectory to families participating in the HACSB Homeownership program and Family Self-Sufficiency programs.

If, during the six-month transition period, an over-income household’s income falls below 80% of the AMI, then the household will no longer be considered over-income and will not transition off the program.

Households in the six-month transition period may also qualify for a hardship exemption from this activity for no-fault loss of income and/or death of a household member with income if the change in income results in the household's income falling below 80% of AMI. If a hardship exemption is approved for such situations, the household will be removed from the six-month transition period and will not transition off the program.

This activity was implemented effective April 1, 2015. At implementation, 89 currently assisted households were identified as "over-income" and given notice of the six-month transition period. Ultimately, 49 of those families were removed from the transition either due to a hardship or because they were determined to no longer be over-income. This activity is ongoing and we will report further outcomes via our FY 2023 Annual MTW Report.

### Notices to Over-Income Households

HACSB issues a total of four notices to over-income households under this activity:

- Thirty (30) days prior to the beginning of the six-month transition period HACSB will issue the household a Notice of Transition along with a summary of Frequently Asked Questions (FAQ) about the transition.
- At least ninety (90) days prior to the end of the transition period HACSB will issue a reminder notice to the household.
- Sixty (60) days prior to the end of the transition period HACSB will issue a reminder notice to the household, including a 60-Day Notice to Quit.
- Thirty (30) days prior to the end of the transition period HACSB will issue a final reminder notice to the household.

### Emergency Operations

In the event of a local disaster, emergency, or other situation which affects the health and/or safety of HACSB customers, employees, and/or the general public, HACSB may implement the following temporary change to this activity ("emergency operations") to ensure continuity of operations to the extent possible and practical.

This and other emergency operations modifications were developed and implemented in early spring 2020 in response to the coronavirus/COVID-19 pandemic. The pandemic created a need for social distancing and other precautions to protect against the spread of the disease. In compliance with the recommendations of the Center for Disease Control (CDC), "stay-at-home" Executive Orders issued by California Governor Newsom, and other guidance from local, state, and federal agencies, HACSB took steps to reduce contact between individuals, including reducing the number of employees in the office through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations change for this activity:

- HACSB delayed by six months the termination of assistance for any household whose six-month transition period was scheduled to end between April 1 and September 30, 2020.

Emergency operations have ended and have returned to normal operations. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None.

### v. Planned Significant Changes

None.



## Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing

### i. Plan Year Approved, Implemented, Amended

- FY 2016: Initial approval.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

This activity allows HACSB to apply an amended definition of elderly for the project-based vouchers at the Horizons at Yucaipa Affordable Senior Housing development in order to meet both the City of Yucaipa's requirements for affordable senior housing as well as the age requirement for the special needs population to be served by units financed under the Mental Health Stabilization Act (MHSA). For purposes of this property, there are two definitions of an elderly (senior) individual.

The Horizons at Yucaipa Affordable Senior Housing development is a two-phase, 77-unit new construction development in the City of Yucaipa. Phase I of the development is 50 units on approximately 4.2 acres of vacant land and includes 49 project-based vouchers and one manager's unit. Phase II will include 27 units and will also be developed for seniors at least 55 years of age. The Phase II building will incorporate into the Phase I building so amenities can be shared and costs reduced. The development will be 100% affordable housing financed through a combination of the following funding sources:

- 4% Low Income Housing Tax Credits
- Tax Exempt Bond funding
- County HOME
- County Mental Health Services Act funding (MHSA)
- Fee deferrals from the City of Yucaipa
- Permanent debt

Phase I contains 50 units. 10 of the 50 units in Phase I are reserved as Mental Health Services Act (MHSA) units and carry an age restriction of 60 years old. The property will operate as affordable housing for seniors. For the 10 MHSA units, an elderly (senior) individual shall be defined as one who is 60 years of age or older in order to meet the MHSA requirements. For the remaining PBV units, an elderly (senior) individual shall be defined as one who is 55 years of age or older in order to meet the City of Yucaipa's senior housing requirements.

In 2015 HPI broke ground on the Horizons at Yucaipa development, and construction of Phase I was completed in the spring of 2017. The phase achieved full lease-up and full occupancy by May 2017. HPI is currently looking at financing options to begin construction of phase II, 27 additional senior units, at the end of 2024.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- HC #4: Displacement Prevention
- HC #5: Increase in Resident Mobility
- Local Metric: Additional Units of Housing Made Available (same as Standard Metric HC #1)
- Local Metric: Seniors 55 to 60 Years of Age Housed through This Activity

### v. Planned Significant Changes

None.

## Activity 26: Local Disaster Short-Term Rental Assistance Program

### i. Plan Year Approved, Implemented, Amended

- FY 2017: Initial approval through FY 2017 Annual MTW Plan, Amendment 1.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

In August 2016 the massive Blue Cut Fire burned more than 36,000 acres in the Cajon pass area of San Bernardino County. The fire caused the complete shutdown of the Interstate 15 freeway and railroad lines, mandatory evacuations of an estimated 82,000 persons in at least six cities, and destroyed 105 homes and 216 minor structures. In the immediate aftermath, approximately seventy households displaced by the fire needed temporary assistance to stabilize their housing situation. The Blue Cut Fire illustrated the need for HACSB to have a mechanism in place to provide temporary housing assistance to families in the event of certain local disasters. This activity is designed to meet that need.

This activity is a short-term rental assistance program to provide temporary housing choice voucher assistance to households displaced as the result of a local disaster. Except as noted below, HACSB's policies and Moving to Work activities for the Housing Choice Voucher Program shall apply to the Local Disaster Short-Term Rental Assistance Program.

This activity has been fully incorporated into HACSB's policies and procedures. However, HACSB will only house households through this activity in the event of a locally declared disaster.

#### Determination of Local Disaster

A local disaster is an event that occurs within the County of San Bernardino and may include a natural disaster such as an earthquake, fire, flood, or storm, an act of terrorism, or other event as determined by HACSB. The qualification of a local disaster will be declared by HACSB through a resolution of its governing board.

#### Wait List

HACSB will maintain a separate wait list for this activity. The wait list will be opened only when a local disaster is declared through a resolution of HACSB's governing board and only to individuals displaced as a direct result of the local disaster.

This program is not a set-aside and no vouchers will be reserved for this activity.

### Eligibility

Assistance in this program will be limited to households displaced as the direct result of a local disaster. Households assisted through this activity will be subject to eligibility screening. At a minimum, each household must qualify as low-income (having gross annual income at or below the HUD-published Area Median Income adjusted for family size) and pass HACSB's criminal history background screening.

### Term of Assistance

The term of assistance shall be determined by HACSB based upon the nature of the disaster at the time the local disaster is declared. In general, HACSB anticipates the term of assistance shall be six (6) to twelve (12) months. If appropriate, HACSB may provide a hardship extension. In any case, the total term of assistance shall not exceed twenty-four (24) months.

### Subsidy Calculation and Reexamination

The rental subsidy and tenant rent portions shall be determined using the formulas established through HACSB's MTW Activity 22: Streamlined Lease Assistance Program. No reexamination of income will be conducted during the term of assistance, regardless of the length of the term.

### Leveraging of Resources

HACSB will attempt to engage community partners to provide additional funding, housing stabilization services, and related supportive services to the households assisted through this activity.

### HAP Contract and Lease

The terms of the lease and HAP Contract shall be the same as the term of the Local Disaster Short-Term Rental Assistance.

### Portability

Households assisted through this activity may not exercise portability to another jurisdiction unless the receiving PHA will absorb the household.

### Subject to Availability

Assistance provided through this activity shall be subject to the availability of funding as determined by HACSB.

## iii. Planned Non-Significant Changes

None.

## iv. Planned Changes to Metrics/Data Collection

None. In accordance with HUD Form 50900, HACSB will report on this activity using the following metrics:

- HC #3: Decrease in Wait List Time
- Local Metric: Number of Households Served through the Activity

## v. Planned Significant Changes

None.

## Activity 27: Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents

### i. Plan Year Approved, Implemented, Amended

- FY 2019: Initial approval through FY 2019 Annual MTW Plan, Amendment 2.
- FY 2020: Modified to include a type two subsidy and income band TTP calculation through FY 2020 Annual MTW Plan, Amendment 3.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

Through this activity, HACSB is authorized to change the total tenant portion (TTP) calculation to create one that is based upon income bands, applying a flat TTP within each income band instead of basing the calculation of TTP on gross or adjusted income. Additionally, HACSB is authorized to modify the housing authority subsidy calculation as specified below. The activity applies to:

- 116 RAD-PBV units at the Waterman Gardens Phase III development, Crestview Terrace, excluding any RAD household exercising right of first return to those units. These units use the HACSB Subsidy and Income Band TTP Calculation – Type One.
- Eight PBV units located at the Daycreek Villas community in Rancho Cucamonga, California. These units use the HACSB Subsidy and Income Band TTP Calculation – Type Two.
- Future PBV units on a case-by-case basis. These units may use either the Type One or Type Two HACSB Subsidy and Income Band TTP Calculation.

#### Implementation Update – Crestview Terrace

This third and final RAD conversion phase at the Waterman Gardens site in San Bernardino (AMP 120, site 19-02) added 182 family rental units to complete the one-for-one replacement of the original 252 Public Housing units formerly located there while also adding market rate units to create a mixed-income community. The development utilizes Demolition/Disposition Transition Fund (DDTF) leveraged with City and County of San Bernardino HOME funds, state of California Affordable Housing and Sustainable Communities funds, private healthcare organization (Dignity Health) funds, and 4% Low Income Housing Tax Credits (LIHTC) coupled with tax-exempt private activity bonds. The unit breakdown is:

- 116 RAD project-based voucher (PBV) units with tax credits.
- 31 tax credit affordable units.
- 35 market rate units with no RAD, PBV, or tax credits.

The following table contains the breakdown of the 147 affordable units by size and tax-credit income bracket:

30% AMI TARGET		50% AMI TARGET		60% AMI TARGET		TOTAL
UNIT SIZE	NUMBER OF UNITS	UNIT SIZE	NUMBER OF UNITS	UNIT SIZE	NUMBER OF UNITS	
1 Bedroom	6	1 Bedroom	6	1 Bedroom	10	22
2 Bedroom	21	2 Bedroom	21	2 Bedroom	39	81
3 Bedroom	9	3 Bedroom	9	3 Bedroom	14	32
4 Bedroom	1	4 Bedroom	2	4 Bedroom	7	10
5 Bedroom	2	5 Bedroom	0	5 Bedroom	0	2
<b>Total</b>	<b>39</b>	<b>Total</b>	<b>38</b>	<b>Total</b>	<b>70</b>	<b>147</b>

#### HACSB Subsidy and Income Band TTP Calculation – Type One

Through this activity, the TTP and contract rents for the Crestview Terrace 116 RAD-PBV tax credit units are set as follows:

- TTP (tenant rent) will be set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will be set below 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. At this time, the contract rents are anticipated to be set at 91.247% of 110% of the FMR. Contract rents may be increased through an increase to the TCAC-published Tax Credit rents.
- The Housing Assistance Payment (HAP) subsidy will be the difference between the contract rent and the TTP. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard RAD-PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

Through these modifications, HACSB is able to apply a simplified rent and subsidy structure without changing the total amount of subsidy provided to support the development.

#### HACSB Subsidy and Income Band TTP Calculation – Type Two

The eight PBV units located at the Daycreek Villas community in Rancho Cucamonga, which began occupancy in the fall of 2020, utilizes this Type Two calculation.

The TTP and HAP subsidy are set as follows:



- TTP (tenant rent) is set at the applicable tax credit rent based on the unit size and target AMI for the unit.
- Contract rents will equal the TTP plus the fixed HAP subsidy, and shall not exceed 110% of the HUD-published Fair Market Rent (FMR) based on bedroom size. Contract rents may be increased through an increase to the TCAC-published Tax Credit rents.
- The Housing Assistance Payment (HAP) subsidy is fixed at \$700. Payment of the HAP subsidy shall be subject to the availability of federal funding. The HAP contract will otherwise be the same as a standard PBV HAP contract.
- The contract rent will not be permitted to exceed 110% of the FMR.

### Hardship Case Criteria

HACSB recognizes that under some circumstances, households may experience a hardship that makes it challenging to pay the applicable rent under this activity. Hardship exemption criteria have been developed for households whose rent burden exceeds 40% while participating in this program.

To be eligible for a hardship exemption, the household must:

1. Have a rent burden greater than 40%. Rent burden is calculated as the household's monthly rent portion (the applicable tax credit rent) divided by the household's gross monthly income; and
2. Request a hardship exemption in writing in accordance with HACSB's policies; and
3. Be in compliance with HACSB's policies, program rules, and regulations.

A hardship exemption may be approved for the following reasons:

1. The household experiences a death of a household member with income;
2. Any income-earning member of the assisted household no longer remains in the unit;
3. An elderly or disabled household experiences a permanent loss of income;
4. Unforeseen and involuntary permanent loss of income for a household member under the age of 18;
5. Unforeseen involuntary loss of employment or unforeseen loss of income due to major illness as determined by a medical professional; or
6. Unforeseen involuntary permanent loss of income for an adult household member who is attending high school.

If a hardship exemption has been approved, HACSB will reduce the household's TTP to 40% of gross income for a period of six months. During the hardship exemption period, HACSB will continue to pay the HAP subsidy plus the difference between the household's reduced TTP and the tax credit rent ("Hardship HAP" – the difference between 40% of the household's gross income and the applicable tax credit rent). At the end of the hardship exemption period, the household's TTP will return to the tax credit rent and the HACSB subsidy will return to the previous HAP subsidy. For example:

A 3-person household is residing in a 2-bedroom 50% tax credit unit. They pay the tax credit rent of \$758 per month. Their income is \$27,315 per year and their rent burden is 33.3%. HACSB pays a HAP subsidy of \$564 per month based on the subsidy and income band calculation.

A 17-year-old member of the household experiences an unforeseen and involuntary permanent loss of income. The household's new income is \$21,000 per year. Their rent burden under the base income band TTP calculation is now 43.3%.

HACSB approves a hardship exemption for the household based upon the unforeseen and involuntary permanent loss of income for a family member under the age of 18. For six months, the household's TTP will be set at 40% of their gross income, or \$700. During the hardship exemption period HACSB will continue to pay to the owner the HAP subsidy of \$564 per month, plus the difference between the TTP and the tax credit rent, or \$58.

At the end of the hardship exemption period, the household's TTP will return to the tax credit rent. The HACSB subsidy will return to \$564.

No more than one hardship exemption per household may be approved within a 12-month period. Approval will be subject to the availability of funds.

**Crestview Terrace Units:** HACSB will apply MTW funding flexibility to create a "Tenant Rent Burden Protection Fund" from which the Hardship HAP will be paid. HACSB and its developer partner will both contribute to this fund to ensure the availability of hardship exemptions for rent-burdened households.

**All Other Units:** Hardship HAP shall be paid using MTW Block Grant funds in the same manner as HAP.

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with the HUD form 50900, HACSB will report on this activity using the following metrics:

- HC #1: Additional Units of Housing Made Available

### v. Planned Significant Changes

None.

## Activity 28: Leasing Success Strategies

### i. Plan Year Approved, Implemented, Amended

- FY 2022: Initial approval through FY 2022 Annual MTW Plan.
- FY 2022, Amendment 1: Reproposed activity to include housing navigation services and other supportive services.

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for eligible low-income families.

Through this activity, HACSB implements strategies designed to increase the leasing success rate of households participating in HACSB MTW voucher programs. All components of this activity are subject to availability of funding.

#### Signing Bonus

HACSB provides a one-time \$1,000 signing bonus for each new HAP Contract signed after the program goes into effect. HACSB has established the following criteria for the incentive:

- The assisted unit must be located in HACSB's service area which is the entire County of San Bernardino excluding the City of Needles.
- Voucher holder must be a new program participant or existing program participant who is new to the rental property.
- Executed lease and contract with all required addendums will be required before the signing bonus will be made.

The following properties are not eligible for the signing bonus:

- Tax credit properties
- Units under a project-based voucher (PBV) HAP contract
- HACSB and HACSB affiliate owned units

The following situations do not qualify for a signing bonus:

- An existing program participant is signing a new lease to remain in their current subsidized unit.
- An existing voucher participant is moving from one unit to another in the same apartment complex, such as a tenant moving from upstairs to downstairs.

#### Housing Navigation and Other Supportive Services

HACSB uses MTW single-fund flexibility to fund housing navigation and other supportive services to tenant-based voucher program customers to support leasing success. This strategy is a temporary service and is anticipated to be in place for no more than 1-2 years to support leasing efforts

during this extremely challenging time. Housing navigation and supportive services will be offered only to households newly entering HACSB's tenant-based voucher program (initial tenancy); some exceptions may be made to offer housing navigation and supportive services to existing (currently assisted/previously leased) families for extenuating circumstances, such as situations covered by the Violence Against Women Act (VAWA) or when an assisted household experiences homelessness after vacating their previous unit. Housing navigation and supportive services will be made available to each household for the duration of the household's voucher search and will end when the household successfully leases a unit. All services are voluntary; HACSB will offer the services at the time of voucher issuance, but the household is not required to accept or participate in any or all services. Housing navigation and supportive services offered include the following: available unit identification, landlord-tenant connection and negotiation, coordination and case management with referral partners, financial assistance, tenant damage mitigation fund and/or a tenant education program, and transportation services (if applicable).

### iii. Planned Non-Significant Changes

None.

### iv. Planned Changes to Metrics/Data Collection

None. In accordance with the HUD form 50900, HACSB will report on this activity using the following metrics:

- **Local Metric: Average Number of Days from Voucher Issuance to Lease Start**  
HACSB will compare the baseline (pre-implementation) and post-implementation number of days from voucher issuance to lease start to help determine if the activity is shortening the search time for voucher holders.
- **Local Metric: Successful Lease Rate**  
HACSB will compare the baseline (pre-implementation) and post-implementation percentages of voucher holders who successfully lease a unit to help determine if the activity is improving voucher holders' ability to lease a unit.

### v. Planned Significant Changes

None.

## Activity 29: Moving On Strategy

- i. Plan Year Approved, Implemented, Amended FY 2023: Initial approval through FY 2023 MTW Annual Plan

### ii. Description/Update

This activity addresses the MTW statutory objective to increase housing choices for low-income families.

This activity was developed in alignment with HUD's encouragement of housing agencies and communities to explore strategies to promote the transition of households in permanent supportive housing (PSH) programs who no longer need or want the intensive services of those programs into housing assistance programs that do not include those services, such as the Housing Choice Voucher and Public Housing programs. Through this activity, HACSB allows households participating in the Continuum of Care (CoC) programs administered by HACSB to voluntarily transfer into HACSB's tenant-based MTW voucher program. Households are evaluated for readiness to transition from the CoC program, which includes supportive services such as case management, employment assistance and job training, housing search and counseling services, life skills training, mental health services, outpatient health services, and other services provided by the San Bernardino County Department of Behavioral Health (DBH), into tenant-based MTW housing assistance without those services. This activity allows HACSB to ensure housing stability while also providing households the opportunity to take their next step toward housing independence. Additionally, HACSB will be able to serve new chronically homeless households in need of the supportive services and housing assistance offered through the CoC program as other households voluntarily transition into the tenant-based MTW voucher program.

#### Household Selection and Transition

Households participating in the CoC program are evaluated by DBH using the Supportive Service Level of Care Assessment (LCA) developed by DBH. The LCA evaluates housing, mental health, and physical health domains to determine readiness to transition. Households identified by DBH as ready to transition are referred to HACSB for the Moving On program. HACSB reviews the household's potential post-transition rent burden and confirms the household's readiness to transition using the transition assessment developed in partnership with Loma Linda University. The transition assessment is based upon the self-sufficiency matrix and evaluates life skills, income, education, and other domains. Once HACSB confirms readiness, the household will be invited to voluntarily transition to the HACSB tenant-based MTW voucher program.

Transition from the CoC program into HACSB's tenant-based MTW voucher program is voluntary. Invited households may elect to remain in the CoC program without penalty. Households who elect to voluntarily transition will be formally exited as participants of the CoC program and admitted into HACSB's tenant-based MTW voucher program as a special admission under Moving On. Once admitted to HACSB's tenant-based MTW voucher program, DBH will provide aftercare services to participants for at least 24 months following the transition from the CoC program. As outlined in the each of Memorandum of Understanding for the CoC programs with DBH, aftercare services may include, but are not limited to, a variety of supports

around health care engagement, medication assistance, connection to social services, independent living skills coaching, housing stabilization, and assistance with housing program compliance.

### **Rent and Subsidy Determination**

The housing assistance subsidy calculation for Moving On households mirrors the Streamlined Fixed Assistance Program for Elderly/Disabled Households as established through HACSB's MTW Activity 22 - Streamlined Lease Assistance (SLA), except that the household's rent share (TTP) is the greatest of 24% (not 30%) of their gross income, the minimum rent, or baseline rent. All other components of the SLA activity apply to Moving On households.

### **Other Applicable MTW Activities**

All other active HACSB MTW activities applicable to tenant-based voucher households also apply to Moving On families, except:

- 20 - Term-Limited Lease Assistance; and
- 23 - No Child Left Unsheltered.

### **iii. Planned Non-Significant Changes**

None.

### **iv. Planned Changes to Metrics/Data Collection**

None. In accordance with the HUD form 50900, HACSB will report on this activity using the following metrics:

- SS #1: Increase in Household Income
- SS #3: Increase in Positive Outcomes in Employment Status
- SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)
- SS #6: Reducing Per Unit Subsidy Costs for Participating Households
- SS#7: Increase in Tenant Rent Share
- SS#8: Households Transitioned to Self-Sufficiency

### **v. Planned Significant Changes**

None.

## B. Not Yet Implemented Activities

HACSB does not have any activities that are approved and not yet implemented.



## C. Activities on Hold

### Activity 3: Alternate Assessment Programs

#### i. Description

This activity was approved through HACSB's FY 2009 Annual MTW Plan and has not yet been implemented. The activity was placed on hold via HACSB's FY 2010 Annual MTW Plan.

The activity allows HACSB to opt out of the HUD SEMAP and PHAS scoring systems and establish its own program assessment systems designed to measure the quality and timeliness of work performed under the MTW Agreement.

HACSB formally opted out of the PHAS and SEMAP on December 8, 2010 and will continue to retain its high performer status until a new MTW-wide successor system is adopted, at which time HACSB can be fully scored under that system.

#### ii. Reactivation Plan Update

At HUD's 2009 Annual MTW Conference we learned that there was an effort to establish an MTW-wide successor to the Section Eight Management Assessment Program (SEMAP) and Public Housing Assessment Program (PHAS) systems currently in place. Rather than develop its own assessment system, HACSB determined that it would instead place this activity on hold until the MTW-wide assessment system is implemented.

The MTW-wide assessment system is still in development. An update on the assessment system was provided at the MTW Conferences in 2019 and 2021, and testing by current MTW agencies is ongoing. The exact date for implementation of the MTW-wide assessment system is not yet known. The system will need to be approved by HUD prior to implementation, and a target date has not yet been set. This activity remains on hold pending approval and implementation of that system.

#### iii. Planned Non-Significant Changes

None.

## D. Closed Out Activities

### Activity 2: Strategic Investment Policies

#### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved through our FY 2009 Initial Annual MTW Plan and implemented in November 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

#### ii. Reason(s) for Close-Out

This activity was closed out in response to HUD's comments regarding the HACSB FY 2019 Annual MTW Plan, wherein HUD stated that Notice PIH 2011-67 (Implementation of New Cash Management Requirements for the Housing Choice Voucher Program) effectively nullifies the activity and requested that the activity be moved to the Closed Out Activities section of HACSB's Annual MTW Plan.

### Activity 6: Elimination of Assets

#### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2009 Annual MTW Plan and was implemented on October 1, 2009. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

#### ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (this activity), 9 (Elimination of Earned Income Disallowance), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

## Activity 7: Controlled Program Moves

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2009 Annual MTW Plan and implemented on February 1, 2010. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

### ii. Reason(s) for Close-Out

This activity resulted in a significant decrease in agency costs and staff time spent related to processing voluntary moves. In FY 2017, both costs and time spent reflected approximately a 64% decrease over the baselines. The staff time spent per move was 42% lower in FY 2017 than the baseline value. However, because the total number of moves did not decrease as much as was anticipated, the benchmarks for staff time and cost savings were not reached.

As with all of our MTW activities, HACSB performed internal monitoring of aspects of the Controlled Program Moves activity beyond what was reported through our annual MTW reports. We found that, while this activity resulted in cost and time savings related directly to a reduction in the number of moves processed annually, it also resulted in additional administrative burden in other areas. For example, we identified an increase in the number of moves requested as a reasonable accommodation and/or under the provisions of the Violence Against Women Act (VAWA) after implementation of this activity. Additionally, the two-year lease requirement caused other challenges, especially for families nearing the end of their participation in the Term-Limited Lease Assistance Program. As a result, we eliminated the two-year lease requirement and closed out this activity through our FY 2019 Annual MTW Report.

## Activity 9: Elimination of Earned Income Disallowance

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was initially included in HACSB's FY 2009 Initial Annual MTW Plan and became effective on October 1, 2009, for participants in the Housing Choice Voucher and Public Housing programs. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

### ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (this activity), and 17 (Local Income Inclusions) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

## Activity 15: Pilot Work Requirement

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in the FY 2010 Annual MTW Plan. The work requirement was implemented on January 1, 2013, for the Maplewood Homes Public Housing community, and expanded to include all inbound portability families effective August 1, 2010. The work requirement at Maplewood Homes was ended in FY 2016 as a result of the RAD conversion of that site. The work requirement for portability families was ended and this activity was closed out through HACSB's FY 2019 Annual MTW Plan.

### ii. Reason(s) for Close-Out

This activity was closed out as a result of internal analysis which identified certain challenges in administering the work requirement, as well as advantages of ending the requirement. Ending the work requirement will reduce administrative burden, streamline HACSB's processes, and increase housing choice for families who desire to exercise portability to San Bernardino County. Additionally, ending the work requirement will empower families to make decisions about their housing and employment that are best for their unique family circumstances.

## Activity 16: Operating Subsidy for Vista del Sol

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved through the second amendment to our FY 2010 Annual MTW Plan and implemented on April 23, 2010. This activity was closed out via HACSB's FY12 Annual MTW Plan.

### ii. Reason(s) for Close-Out

On September 15, 2010, HACSB executed a Project-based Voucher contract, and no longer needs the operating subsidy.

## Activity 17: Local Income Inclusions

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2011 Annual MTW Plan and implemented on May 1, 2011. This activity was modified through HACSB's FY 2015 Annual MTW Plan. The activity was closed out through HACSB's FY 2019 Annual MTW Plan.

### ii. Reason(s) for Close-Out

This activity was closed out due to the merge of activities 5 (Local Verification Policies), 6 (Elimination of Assets), 9 (Elimination of Earned Income Disallowance), and 17 (this activity) through HACSB's FY 2019 Annual MTW Plan. This activity is now closed out as a separate activity. However, the modifications originally included through this activity are now incorporated into activity 5, which was re-titled "Simplified Income Determination" through HACSB's FY 2019 Annual MTW Plan.

## Activity 19: Local Family Self-Sufficiency Program

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2011 MTW Annual Plan and implemented on July 1, 2012. This activity will close out through this 2024 MTW Annual Plan.

### ii. Reason(s) for Close-Out

This activity allowed HACSB to develop a local pilot Family Self-Sufficiency (FSS) program that allowed program participants who were eligible to receive the balance of their escrow account at the end of their FSS contract if they voluntarily terminated their assistance from the Housing Choice Voucher or Public Housing program due to self-sufficiency efforts. Families were also allowed to withdraw a portion of their FSS escrow savings balance during participation in the Local FSS program for certain self-sufficiency-related activities. However, this program experienced low enrollment year after year as interested participants opted to instead enroll in HACSB's traditional FSS program. HACSB plans to develop and propose a revised Local FSS MTW activity in the future.

## Activity 21: Utility Allowance Reform

### i. Plan Year Approved, Implemented, Amended, and Closed Out

This activity was approved in our FY 2012 Annual MTW Plan; it was never implemented. This activity was never implemented.

### ii. Reason(s) for Close-Out

This activity allowed HACSB to develop a flat utility allowance schedule for the Housing Choice Voucher Program based on the consumption methodology versus the traditional engineering methodology. However, subsequent development of other programs—namely, our Term-Limited Lease Assistance Program and the Streamlined Lease Assistance Programs – eliminate the need for a utility allowance. These programs are designed to incorporate the cost of utilities into the subsidy amount without the need to apply a utility allowance separately. As a result, the utility allowance schedule is no longer necessary.

HACSB will continue to monitor the success of the Streamlined Lease Assistance and Term-Limited Lease Assistance programs but at this time, the Agency has postponed utility allowance reform indefinitely.

## V. Sources and Uses of MTW Funds

### A. Estimated Sources and Uses of MTW Funds

The following tables reflect anticipated MTW funding and expenses based upon information available to HACSB at the time of this writing. Additional information may be made available after this Plan is posted for public comment and the values reported below may change when this Plan is presented to the HACSB Housing Commission for approval and/or when the Plan is submitted to HUD for approval.

#### i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	6,564
70600	HUD PHA Operating Grants	139,372,217
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	12,860,084
71100+72000	Interest Income	220,434
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	378,000
<b>70000</b>	<b>TOTAL REVENUE</b>	<b>152,837,299</b>



## ii. Estimated Uses 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	9,485,218
91300+91310+92000	Management Fee Expense	2,487,182
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	2,150,530
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	120,015
93500+93700	Labor	-
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	817,368
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total insurance Premiums	153,322
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	710
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	14,500
97300+97350	Housing Assistance Payments + HAP Portability-In	137,608,454
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
<b>90000</b>	<b>TOTAL REVENUE</b>	<b>152,837,299</b>

DESCRIPTION OF VARIANCE BETWEEN ESTIMATED TOTAL REVENUE AND ESTIMATED TOTAL EXPENSE
N/A.

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

#### DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

1. HACSB's Local FSS activity (#19) is funded using single fund flexibility with savings achieved through other MTW activities.
2. HACSB's Family Empowerment Services department (FES) and its services, which are not a separate MTW activity, are funded using single fund flexibility. This department was previously called Career Development Initiatives (CDI).
3. HACSB's post-assistance tracking survey for Term-Limited Lease Assistance families, implemented in FY 2018, includes a financial incentive for survey participants which is funded through the single fund flexibility.
4. HACSB is authorized to use Section 9 (Public Housing) funds defined as Public Housing operating reserves, Capital Fund Grants, Replacement Housing Factor Funds, and Demolition and Disposition Transitional Funds at former Public Housing properties that have been converted to Project-Based Voucher (PBV) properties through the Rental Assistance Demonstration. This authorization applies to accumulated reserves, including MTW reserves, and any future allocation of the funds specified in this authorization. The funds will be used for capital needs rehabilitation, operating expenses, and redevelopment costs.
5. In December 2014 HACSB was approved for conversion of its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program. As units are converted the existing Public Housing funding is converted to voucher funding. The converted funding is subject to the single-fund flexibility authorized under the second amended MTW Agreement between HACSB and HUD, which allows HACSB to combine Public Housing Operating Funds, Public Housing Capital Funds, and voucher program funds, for the purposes specified in the MTW Agreement.
6. Single-fund flexibility may be utilized to support expenses for RAD-converted developments, including, but not limited to, mandated reserve contributions.
7. Single-fund flexibility is crucial to HACSB's affordable housing development efforts. By leveraging multiple internal sources (Capital Fund, RHF, Voucher funding), HACSB maximizes funding from private sources and therefore is able to develop a greater number of housing units. For example, within the Waterman Gardens public housing revitalization project, single-fund flexibility is utilized to increase RAD contract rents to match local market rent levels, thereby allowing us to generate more private debt and equity necessary for new construction.
8. HACSB will utilize single-fund flexibility to support the acquisition of rental housing properties, in conjunction with commitment of project-based vouchers (PBV) to the site.
  - a. In FY 2024, HACSB intends to acquire a 60-unit rental housing development using single-fund flexibility. MTW funds will support approximately 48.2% of the cost. HACSB will commit 29 PBV units to the site to support the remaining cost. The building is occupied as of May 2023 and HACSB does not yet know whether households residing at the property are income-eligible for PBV assistance. If fewer

than 29 households are eligible, HACSB will add PBV units to the contract as households leave the property through attrition until a total of 29 PBV units is reached.

9. HACSB will utilize single-fund flexibility to establish a retirement trust fund. Doing so will decrease the current unfunded liability and reduce future expenses.
10. In FYE 2024 HACSB anticipates beginning construction of a community resource center (CRC) in the city of San Bernardino. The CRC will provide customers access to HACSB services, including assistance with housing-related needs, self-sufficiency resources, and other services offered by community partners. HACSB will use single-fund flexibility to support the development of the CRC.
11. HACSB's Activity 28: Leasing Success Strategies is funded through single-fund flexibility.

## B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

No.

ii. Is the MTW PHA implementing a local asset management plan (LAMP)?

Yes.

iii. Has the MTW PHA provided a LAMP in the appendix?

Yes.

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.

No changes to the LAMP are anticipated during the Plan Year.

## C. Rental Assistance Demonstration (RAD) Participation

### i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
HACSB has converted its entire Public Housing portfolio under the RAD program in accordance with HUD approvals. Our last Public Housing development (Los Olivos, Upland) was converted to RAD as of June 1, 2022. All units save one single family home have been converted to RAD project-based vouchers (PBV).

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.

No. RAD Significant Amendments were included with prior MTW Plans.

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.

HACSB is not submitting a RAD Significant Amendment through this MTW Plan.

## VI. Administrative

---

### A. Board Resolution and Certification of Compliance

The following items are (or will be, upon approval by the HACSB Board of Commissioners) included with this Plan:

1. Resolution of the HACSB Board of Commissioners adopting this Annual MTW Plan and the Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan
2. Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan (from Form HUD 50900)

## **HOUSING AUTHORITY RESOLUTION NO. 2023-176**

### **A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO'S ANNUAL MOVING TO WORK PLAN FOR FISCAL YEAR 2023-2024**

#### **RECITALS**

**WHEREAS**, the Housing Authority of the County of San Bernardino (HACSB) is a duly formed housing authority of the State of California, and is vested with the responsibilities set forth in Division 24, Part 2, Article 4 (Sections 34310-34334) of the California Health and Safety Code, which includes providing low and moderate income housing within its jurisdiction; and

**WHEREAS**, HACSB entered into a Moving to Work (MTW) contract with the United States Department of Housing and Urban Development (HUD) effective March 14, 2008, which governs the regulations of the administration of the Housing Choice Voucher and Public Housing programs; and

**WHEREAS**, as a MTW agency, the HACSB is required to and has prepared an Annual MTW Plan which describes its operations and activities as an MTW agency; and

**WHEREAS**, the HACSB desires to develop a new MTW activity and modify certain previously approved MTW activities; and

**WHEREAS**, the HACSB has developed its Fiscal Year 2023-2024 Annual MTW Plan, to include the proposed modifications to those MTW activities and in accordance with HUD requirements.

#### **OPERATIVE PROVISIONS**

#### **NOW, THEREFORE, THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO DOES RESOLVE AS FOLLOWS:**

Section 1. The Board of Commissioners finds that all of the facts set forth in the Recitals are true and correct and are incorporated herein by reference.

Section 2. The Board of Commissioners hereby approves the proposed Fiscal Year 2023-2024 HACSB Annual MTW Plan, on July 11, 2023.

Section 3. A complete copy of the 2023-2024 Annual MTW Plan can be found at <https://hacsb.com/moving-to-work/>.

Section 4. The Board of Commissioners hereby approves the HUD-required Certifications of Compliance with Regulations form authorizing HACSB to submit the proposed Fiscal Year 2023-2024 Annual MTW Plan to HUD and certifies that HACSB has complied or will comply with requirements related to the submission and implementation of the Plan.

Section 5. This resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the Board of Commissioners of the Housing Authority of the County of San Bernardino, by the following vote:

AYES:

NOES:

ABSENT:

STATE OF CALIFORNIA                     )  
   )  
COUNTY OF SAN BERNARDINO        )       ss.

I, Maria Razo Secretary of the Board of Commissioners of the Housing Authority of the County of San Bernardino, hereby certify the foregoing to be a full, true and correct copy of the record of the action taken by the Board of Commissioners, by vote of the members present, as the same appears in the Official Minutes of said Board at its meeting of Tuesday, July 11, 2023

Maria Razo  
Secretary



## CERTIFICATIONS OF COMPLIANCE

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

#### **Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (10/01/2023), hereinafter referred to as "the Plan", 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 Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (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 Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan 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 Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (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 75.

- (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 and implementing regulations at 49 CFR Part 24.
- (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 24 CFR 85.20 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 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan 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 Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the County of San Bernardino

CA019

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

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

Maria Razo

Board Secretary

**NAME OF AUTHORIZED OFFICIAL****TITLE**

DocuSigned by:  
  
 3D2843B57CA34F3...

**SIGNATURE**

7/12/2023

**DATE**

**\* Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

## B. Documentation of Public Process

This section includes a detailed timeline of the public process for this Annual Moving to Work (MTW) Plan and a summary transcript of any public comment(s) received during the public process. A copy of the Notice of Public Hearing for this Annual MTW Plan is included.

The Housing Authority of the County of San Bernardino (HACSB) held two public hearings for the Fiscal Year 2023-2024 Annual MTW Plan at the Housing Authority's Housing Program Office at 672 S. Waterman Ave., San Bernardino, CA 92408 on Wednesday, May 31, 2023, at 10:00 a.m., and Thursday June 8, 2023, at 1:00 p.m.

### **Housing Authority Attendees**

- Renee Kangas, Senior Management Analyst
- Ronald Kennedy Jr., Management Analyst
- Patricia Simpson, Management Analyst

### **Purpose of the Public Hearing**

The purpose of the hearing was to provide interested parties with an opportunity to present questions and/or comments regarding HACSB's Fiscal Year 2023-2024 Annual Moving to Work Plan before submission to the Housing Authority's Board of Commissioners and HUD for approval.

The proposed Plan is available for public viewing for 30 days beginning May 23, 2023. The plan was advertised in seven local newspapers, on the HACSB website, and copies were available at all HACSB offices located throughout the county.

### **Call for Public Comments**

On Wednesday, May 31, 2023, the public hearing convened at 10:00 a.m., with Renee Kangas, Sr. Management Analyst, presiding. No members of the public attended, and no public comments were received. The public hearing ended at 10:30 a.m.

On Thursday, June 8, 2023, the public hearing convened at 1:00 p.m., with Renee Kangas, Sr. Management Analyst, presiding. No members of the public attended, and no public comments were received. The public hearing ended at 1:30 p.m.

### SUMMARY OF PUBLIC PROCESS

DATE	ACTION
May 23, 2023	Public comment period opened. This Annual MTW Plan was posted on the HACSB website and made available for review at all HACSB offices.
May 23, 2023, through June 22, 2023	A Notice of Public Hearing regarding this Annual MTW Plan, including the dates/times of public hearing(s) and the public comment period, was published in the following local newspapers: <ol style="list-style-type: none"> <li>1. San Bernardino County Sun</li> <li>2. Black Voice</li> <li>3. El Chicano</li> <li>4. Inland Valley Daily Bulletin</li> <li>5. Precinct Reporter</li> <li>6. Daily Press</li> <li>7. The Press Enterprise</li> </ol>
May 31, 2023, and June 8, 2022	Public hearings held in-person.
June 22, 2023	Public comment period closed.
July 11, 2023	Presentation of this Annual MTW Plan to the HACSB Board of Commissioners for recommended approval.

### SUMMARY OF PUBLIC COMMENTS

DATE RECEIVED FORMAT RECEIVED FROM	COMMENT AND/OR NOTES
-	No comments received.

## C. Planned and Ongoing Evaluations

HACSB has contracted with Loma Linda University (LLU) for third-party evaluation of several MTW initiatives and families served through our MTW programs. This section provides a brief summary of those evaluations.

1. **Term-Limited Lease Assistance Program (Activity 20):** The LLU longitudinal study of this initiative began in 2012 and is ongoing. The study follows participating families through their progress from initial lease-up through their end of term, tracking their goals and accomplishments. In FY 2017, HACSB implemented an additional component to monitor the self-sufficiency related progress of families for up to two years after commencement of housing assistance through a voluntary survey process. The evaluation of current and post-assistance families in this activity will continue in FY 2023, and information gained through the study will continue to be used to adapt and develop the activity. In FY 2023 the study was updated to incorporate the assessment and outcome measurements of the Self-Sufficiency Matrix (SSM). This tool will be utilized for several evaluations being conducted by LLU of HACSB MTW activities and allow for comparison of measurements and outcomes of the various studies.
2. **No Child Left Unsheltered (Activity 23):** A longitudinal study of this activity began in 2015 to identify its effects on participating families. The evaluation is ongoing, and focuses on family safety and stability, physical and mental health of adults and children, school attendance of children, employment, income, education advancement, self-sufficiency activities, financial choices, use of resources, and other effects on children. The reports and recommendations provided by LLU based upon the evaluation have informed HACSB's policy decisions regarding the NCLU activity, especially the enhancements and modifications made through HACSB's FY 2019 MTW Annual Plan. The reports indicated that the activity has had strong positive effects on the mental health and well-being of children participating in the program. The evaluation will continue in FY 2024.
3. **Permanent Supportive Housing:** HACSB has partnered with LLU for evaluation of our two permanent supportive housing (PSH) developments for homeless and chronically homeless individuals and families: Golden Apartments in San Bernardino and Desert Haven Apartments in Victorville. Families in these two developments are served through MTW project-based vouchers. Golden Apartments opened in early 2020, and LLU has provided a baseline/benchmark report of the first families to reside there. The LLU report utilized the Self-Sufficiency Matrix (SSM) assessment tool and HACSB administrative data to assess residents' needs in eighteen domains, including education, employment, housing, health care, mental health, transportation, family relations, substance abuse, and others. The study found that residents' areas of highest need were related to physiological needs and safety, such as food and housing, and mental/physical healthcare and employment. The study also found that the supportive services provided to residents through community partners to augment the housing assistance and help ensure a successful transition to stable, long-term housing, has been vital to the success of the development. The report provided recommendations to HACSB, including: continuing to focus on meeting residents' basic needs; continuing to provide access to mental health and substance abuse services and evaluating whether additional supports in these areas are needed; and focusing on the overall stabilization of the Golden Apartments and Desert Haven Apartments residents and communities before expanding PSH efforts so that lessons learned from these two sites may be applied to future developments. Evaluation will continue for these two sites.

4. **Emergency Housing Voucher (EHV) Program:** HACSB is working with LLU to evaluate outcomes of the Emergency Housing Voucher program administered by HACSB. The evaluation will seek to identify factors that influence a EHV customer's success in 1) locating suitable housing and becoming housed, and 2) remaining stably housed. A preliminary report of the first customers to join the HACSB EHV program was prepared in 2022 and identified common barriers of EHV customers searching for housing. Future evaluation will review these barriers and other factors influencing leasing success as well as factors influencing housing stability for EHV customers.
5. **Other Activities:** HACSB also intends to partner with LLU for evaluations of future MTW activities that are in development, such as the Moving On Strategy. More information about these evaluations will be included as they are developed.

## D. Lobbying Disclosures

Copies of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071) are (or will be, upon approval by the HACSB Board of Commissioners) included here.



# 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

<b>1. Type of Federal Action:</b> <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		<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____	
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  <b>Congressional District, if known:</b> 8, 27, 31, 35, 39			<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  <b>Congressional District, if known:</b>		
<b>6. Federal Department/Agency:</b> U.S. Department of Housing and Urban Development			<b>7. Federal Program Name/Description:</b> Moving to Work CFDA Number, if applicable: _____		
<b>8. Federal Action Number, if known:</b>			<b>9. Award Amount, if known:</b> \$		
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI): Potomac Partners DC 700 Pennsylvania Ave SE, Suite 320 Washington, DC 20003			<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI): Alcalde, Rick; Feliz, Dan		
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Maria Razo</u> Print Name: <u>Maria Razo</u> Title: <u>Executive Director</u> Telephone No.: <u>(909) 332-6305</u> Date: <u>7/11/2023</u>		
<b>Federal Use Only:</b>			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

# Certification of Payments to Influence Federal Transactions

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

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

Applicant Name

Housing Authority of the County of San Bernardino

Program/Activity Receiving Federal Grant Funding

Moving to Work

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

Maria Razo

Title

Executive Director

Signature

*Maria Razo*

Date (mm/dd/yyyy)

*7/11/2023*

# Appendices

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## Appendix A. Annual Statement/Performance and Evaluation Report (Form HUD-50075.1)

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0157  
Expires 11/30/2023

"Public reporting burden for this collection of information is estimated to average 2.2 hours. This includes the time for collecting, reviewing, and reporting the data. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

PHA Name  <b>HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO</b>	Grant Type and Number Capital Fund Program Grant No: CA16P019501-23 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: <b>2023</b>
--	---	--

Type of Grant

- ☒ Original Annual Statement   
 ☐ Reserve for Disasters/Emergencies  
☐ Performance and Evaluation Report for Period Ending:

- ☐ Revised Annual Statement (revision no:  
☐ Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) <sup>3</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)				
5	1480 General Capital Activity				
6	1492 Moving to Work Demonstration	\$208,976.00			
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0157  
Expires 11/30/2023

<b>Part I: Summary</b>					
PHA Name: HOUSING AUTHORITY OF THE COUNTY OF SAN BERNARDINO		Grant Type and Number Capital Fund Program Grant No: CA16P019501-23 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: FFY of Grant Approval: <b>2022</b>	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1 <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
		Original	Revised <sup>2</sup>	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	\$590,910.00			
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				
Signature of Executive Director <i>Flana Razo</i>		Date <i>7/11/2023</i>		Signature of Public Housing Director _____ Date _____	

\* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0157  
**Expires 11/30/2023**

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

<sup>2</sup> To be completed for the Performance and Evaluation Report.

## Appendix B. Local Asset Management Plan (LAMP)

The First Amendment to the Standard MTW agreement executed on May 21, 2009, allowed HACSB to design and implement a Local Asset Management Program (LAMP). The LAMP describes how HACSB is implementing property-based management, budgeting, accounting and financial management, and any deviations from HUD's asset management requirements. In our FY 2010 MTW Annual Plan, we first described our LAMP and amended it through our FY 2010 MTW Plan – Amendment 3 approved on September 15, 2010. Prior to our designation as a MTW agency, HACSB developed a comprehensive 30-year strategic plan in 2008 that has served as a guiding map in achieving our mission, vision, and goals. Some of the goals of our plan include helping our participants achieve self-sufficiency, providing timely housing assistance to needy families, increasing housing options, and strengthening our agency, our residents and our community. As good stewards of taxpayer's dollars, we pride ourselves in achieving administrative efficiency while providing the best quality service to the families that we serve. We feel that the indirect cost rate methodology will best serve our mission, versus the previously used fee-for-service methodology. In accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), we elected to establish a cost allocation methodology to allocate direct and indirect costs and establish an indirect cost rate. The cost allocation plan along with the indirect cost rate is described in detail below and we agree to justify the indirect cost rate established.

HACSB performed a detailed examination of our agency structure, including our Central Office Cost Center (COCC) structure, and confirmed how intertwined our Central Office was to the agency as a whole. The work done by various departments resulted in agency-wide solutions and our combined efforts help us achieve our goals. This reinforces the need for an indirect cost rate methodology that allows the flexibility to combine resources and achieve inter-department solutions that represent a simple unified solution for the families that we serve and our agency. We hope that our collective efforts at various levels provide the best services, the best support, and the best housing choices for our families. This has led to a centralized effort in many services like information services, community affairs, administrative services, waiting list, and development. Details on some of our departments are provided below.

**Information Technology (IT)** – Formerly referred to as Information Services, our centralized IT department is responsible for the network and server administration, database and software administration, telecommunications and software and report developments for the entire agency. This is done with a dedicated team of four individuals that support 301 agency computers in 41 locations throughout our county. They respond to an average of 180 help desk tickets per month that result in around 20 site visits per month.

**Policy and Public Relations** – Our centralized Policy and Public Relations department is responsible for outreach and education efforts to partners, stakeholders, elected representatives, and HUD. This team also coordinates our Moving to Work efforts, including planning and reporting, communication with HUD teams, and analysis and evaluation efforts. The Policy and Public Relations team oversees all research efforts under our partnership with Loma Linda University for third-party evaluation of various HACSB programs and services. The partnership, which has been in place since 2010, has included a longitudinal evaluation of our Term-Limited Lease Assistance and No Child Left Unsheltered activities, needs assessments

to help identify areas of need and appropriate supportive services, and evaluations of our first two permanent-supportive housing sites for homeless and chronically individuals and families. Additionally, the Policy and Public Relations team coordinates the processes for submission of items to our Board of Commissioners for review and approval.

**Administrative Services** – The Administrative Services department assists other offices by providing oversight on matters pertaining to the agency’s compliance with state and federal requirements. As an example, this department works to ensure compliance with annual filings of Statement of Economic Interests, the Brown Act, Public Records Requests, the Fair Housing Act, and Americans with Disabilities Act (ADA).

**Development** – Our centralized Real Estate Development team is responsible for all Real Estate acquisition, rehabilitation, redevelopment, and new construction projects. Our dedicated project managers often eliminate the costs associated with outside development and/or construction management consultants. The staff is continuously available to HACSB’s in-house property management teams as a technical, as well as planning and implementation resource for non-routine maintenance and emergency rehabilitation projects. The Department also assists property management in the completion of all Physical Needs Assessments and due diligence reports for the entire portfolio of HACSB residential developments. This department also either directly oversees or assists in all of the Capital Fund improvement and rehabilitation projects within the public housing or RAD converted housing portfolios and administers all grant funding and debt financing that can be associated. The development team led the implementation of HACSB’s first Permanent Supportive Housing sites for homeless and chronically homeless individuals and families. They also continue overseeing the ongoing major revitalization of HACSB’s oldest public housing sites in Redlands (Formerly Redlands-Lugonia, now known as Valencia Grove) and San Bernardino (formerly Waterman Gardens, now known as Arrowhead Grove). Finally, Development administers a very successful homeownership program that has helped over 262 low-income families overcome barriers and achieve homeownership. The Homeownership program utilizes a variety of methods to aid participants on their path to homeownership, including Section 32 (converted public housing), Section 8 Homeownership, and a Community Land Trust.

**Procurement** - Our centralized procurement department is responsible for agency-wide contracts. Centralized duties include the oversight of the contract needs of our housing sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with procurement staff to define scopes of work, and ensuring the work is done properly.

#### **Local Asset Management Implementation**

**Leadership** - Our local asset management program is led by a team consisting of representatives from the following departments: housing services, development, affordable housing, finance, administrative services, human resources, information technology, procurement, and policy and public relations.

**Project-based Management** - We expect all our programs, regardless of funding source, to be accountable for project-based management, budgeting, and financial reporting.



HACSB has been operating under project-based budgeting and accounting practices since 2006. We have developed systems and reports to facilitate the onsite management and analysis of budgets, expenses, rent collection and receivables, and purchasing. In accordance with HUD Asset Management guidance, HACSB decentralized its maintenance program in 2008 and each AMP was assigned maintenance personnel, depending on the size and maintenance requirements of the properties in the AMP. HACSB has a decentralized purchasing model for the acquisition of goods. Sites staff use a simple purchasing system that enables them to be able to purchase goods directly from their pool of vendors while still enabling management staff to track spending habits. While the acquisition of goods is decentralized, the agency has adopted a hybrid approach to the acquisition of its services. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with procurement staff to define scopes of work, and ensuring the work is done properly.

**Cost Allocation Approach** - Under OMB Circular A-87, there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, HACSB has identified all of its direct costs and segregated all its costs into pools, as either a direct or an indirect cost pool.

**Direct Costs** – OMB “Omni Circular” defines direct costs as follows: Direct costs are those that can be identified specifically with a particular final cost objective. HACSB’s direct costs include, but are not limited to:

- Contract costs readily identifiable with delivering housing assistance to low-income families
- Housing Assistance Payments, including utility allowances, for vouchers
- Utilities
- Insurance
- Property-based audits
- Staff training
- Interest expense
- Information technology fees
- Portability administrative fees
- Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities
- Operating costs directly attributable to operating HACSB-owned properties
- Fleet management fees
- Maintenance services for unit or property repairs or maintenance

- Maintenance services include, but are not limited to, landscaping, pest control, decorating and unit turnover
- Community Services department costs directly attributable to tenant services
- Gap financing real estate transactions
- Acquisition costs
- Demolition, relocation and leasing incentive fees in repositioning HACSB-owned real estate
- Homeownership activities for low-income families
- Leasing incentive fees
- Certain legal expenses
- Professional services at or on behalf of properties or a portfolio, including security services
- Extraordinary site work
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families
- Any cost identified for which a grant award is made. Such costs will be determined as HACSB receives grants

**Indirect Costs** – OMB “Omni Circular” defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. HACSB’s indirect costs include, but are not limited to:

- Executive
- Communications
- Certain legal expenses
- Development
- Finance
- Purchasing
- Human Resources
- Housing Finance and Asset Management
- Administration staff and related expenses of the Housing Operations and Rental Assistance Departments that cannot be identified to a specific cost objective.

**Indirect Services Fees** - HACSB has established Indirect Services Fees based on anticipated indirect costs for the fiscal year. Any indirect costs incurred by HACSB in support of its projects and programs will be incurred by the Central Office Cost Center (COCC) and charged out to the programs in the form of a fee. The three fees are:

- Asset Management Fees

- Management Fees
- Bookkeeping Fees

**Asset Management Fees** – This fee was described in Plan Year 2010 and was modified through our third amendment to the FY 2010 MTW Annual Plan. The Asset Management Fee uses our fungibility to transfer funds among AMPS and allows us to charge an asset management fee, regardless of whether a project has excess cash. The COCC will continue to charge the Asset Management to the AMPS at the HUD’s determined rate of \$10 per ACC unit.

**Management Fees** – The COCC will continue to charge the Management Fee at the HUD’s determined rate of \$93.58 per units leased to the AMPS and 20% of Administrative Fees for Housing Choice Voucher program.

**Bookkeeping Fees** - The COCC will continue to charge the Bookkeeping Fee at the HUD’s determined rate of \$7.50 per unit leased to the AMPS and the Housing Choice Voucher program.

Per the requirements of OMB “Omni Circular”, the indirect services fees are determined in a reasonable and consistent manner based on total units and/or leased vouchers. The fees are calculated as a per-housing-unit or per-leased-voucher per month charged to each program. HACSB will annually review all of its indirect service fees charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis.

**Differences between HUD Asset Management and HACSB LAMP** - Under the First Amendment, HACSB is allowed to define costs differently than the standard definitions published in HUD’s Financial Management Guidebook pertaining to the implementation of 24 CFR 990. HACSB is required to describe in this MTW Annual Plan differences between our Local Asset Management Program and HUD’s asset management program. Below are the three key differences:

- HACSB determined to implement an indirect service fee that is much more comprehensive than HUD’s asset management system. HUD’s asset management system and fee for service is limited in focusing only on a fee for service at the Low Income Public Housing (LIPH) property level. HACSB’s LAMP is much broader and includes local housing and other activities not found in traditional HUD programs. HACSB’s LAMP addresses the entire HACSB operation.
- HUD’s rules are restrictive regarding cash flow between projects, programs, and business activities. HACSB intends to use its MTW resources and regulatory flexibility to move its MTW funds and project cash flow among projects without limitation and to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- HACSB charges an Asset Management Fee to all AMPS regardless of excess cash by each AMP by the use of our fungibility.

**FDS Reporting** – HACSB will continue to report on the HUD’s established deadlines following the same format as previous years using the Asset Management with COCC/ elimination.

## Appendix C. Non-Moving to Work Information

### Special Purpose Programs

In addition to the MTW Voucher Program, HACSB administers other non-Moving to Work affordable housing programs such as Housing Opportunities for Persons with AIDS (HOPWA), Veteran's Affairs Supportive Housing (VASH), Emergency Housing Voucher (EHV) Program and Continuum of Care.

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED <i>AS OF MARCH 2023</i>
Housing Opportunities for Persons with AIDS (HOPWA)	HACSB has partnered with Foothill Aids Project to offer tenant-based and project-based rental assistance and supportive services to persons diagnosed with HIV/AIDS. The Foothill AIDS Project assesses the applicant's duration of participation in their case management program and facilitates location of suitable housing to meet their clients' needs.	55
Veteran's Affairs Supportive Housing (VASH)	HACSB and Veterans Administration Medical Center have partnered to provide tenant-based and project-based vouchers and supportive services to eligible homeless veterans with severe psychiatric or substance abuse disorders. The program goals include promoting Veteran recovery and independence to sustain permanent housing.	445
Master Leasing Program	This program is funded through the State of California Mental Health Services Act and serves mentally ill or developmentally disabled families with emergency shelter housing. Case management and comprehensive supportive services are provided for program participants.	11
Emergency Housing Voucher (EHV) Program	The EHV program is a federal rental assistance program serving low-income households across the country. EHV helps individuals and families locate rental housing and provides financial assistance to make their rent affordable. HACSB is authorized to serve up to 455 households in this program.	390* <i>*As of 5/22/23</i>

### Continuum of Care Programs

The Continuum of Care Program (formerly Shelter Plus Care) provides rental assistance for hard-to-serve chronically homeless persons with disabilities in connection with supportive services funded from sources outside the program.

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED AS OF MARCH 2023
Laurelbrook Estates	This program assists individuals or families who are chronically homeless and is a Continuum of Care project-based voucher subsidy tied to designated scattered sites throughout the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health.	26
Project Gateway	HACSB formed a partnership with Ontario Housing Authority, Mercy House Living Centers Inc., and the San Bernardino County Department of Behavioral Health (DBH) to provide permanent housing in conjunction with long-term supportive services including mental health care, employment, self-sufficiency etc. to individuals and families who are chronically homeless in our community.	12
Cornerstone	This program was initially implemented in 2012 and provides rental assistance for hard to serve chronically homeless individuals and families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). As of March 1, 2023, three existing tenant-based Continuum of Care programs (New Horizons, Whispering Pines and Stepping Stones) have all been consolidated into the Cornerstone Program. This is an ongoing program, and all turnover vouchers focus on providing housing to chronically homeless households. HACSB provides the housing services based on eligible referrals from the CES and the DBH, matches housing funds by providing supportive services.	226
Lantern Woods	This program was implemented in 2012 and is a Continuum of Care project-based voucher subsidy tied to designated sites in the County of San Bernardino. The supportive services are offered through the DBH for chronically homeless individuals and families.	15

## HACSB Scholarship Program

Since 1991, the Housing Authority has been proud to assist eligible participants in achieving their higher educational goals through scholarships. To date, HACSB has awarded 316 students with \$230,500 in scholarships. Current participants/residents in Housing Choice Voucher programs, Public Housing programs, or other HACSB affordable housing communities are eligible to apply. Students need to be accepted by or currently attending a four-year college/university, community college, or technical/vocational school. Students attending a four-year college or university receive a \$1,500 scholarship while community college and technical/vocational school students receive a \$750 scholarship. The Housing Authority uses non-public funds to support this program promoting educational success. During the spring of 2023 HACSB began accepting applications for the HACSB Scholarship Program and anticipates awarding scholarships to several current participants/residents from our various programs in the summer of 2023.

## Knowledge & Education for Your Success (KEYS)

KEYS is a 501(c)(3) nonprofit corporation created in 2009 by HACSB to consolidate HACSB's array of supportive services, centralize strategic community partnership development, and to provide additional support and services for economically disadvantaged families and children. The development of KEYS created a unique opportunity to utilize non-traditional, non-Public Housing Authority funding sources to bring additional resources not only to the clients that HACSB serves, but to be able to spread resources to those in need, not directly served by HACSB, subsequently assisting HACSB in achieving our mission of empowering all individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

The mission of KEYS is to empower low-income individuals and families in San Bernardino County and to unlock their potential for success. KEYS is committed to a community where individuals and families can lead meaningful and empowered lives and pass that legacy to future generations.

Over the past fiscal year, KEYS has focused on some of the county's families in greatest need. Since January 2015, in partnership with HACSB and the San Bernardino County Transitional Assistance Department (TAD), KEYS has administered the Housing Support Program (HSP), a Rapid Rehousing program based on national best practices to rapidly transition eligible homeless families with children back into permanent housing. The Housing Support program was followed by the launch of two additional Rapid Rehousing programs called Keys for Success (KFS) and Keys for Life (KFL) through the U.S. Department of Housing and Urban Development's Continuum of Care aimed at serving homeless individuals and families that need housing and intensive case management up to 24 months. KEYS has utilized its experience with the Supportive Services for Veterans and their Families (SSVF) program and housing navigation to rapidly identify and secure permanent housing for families in the KFS and KFL programs. As part of the ongoing support of the families (up to 24 months) and to help ensure family stabilization KEYS utilizes its Family Strengthening casework model to ensure resources and tools are in place for the family to maintain their housing over time and increase economic independence.

KEYS continues to focus on a collective impact strategy which aligns with a county wide approach.

Together, KEYS, HACSB, and our many community partners are working diligently to change the trajectory for families living in poverty and provide a safe and unique environment to help them thrive and become self-sufficient.

## Other Affordable Rental Housing

**Affiliate Non-Profit** – Housing Partners I, Inc. (HPI, Inc.) was created in 1991 to develop, own, and manage affordable housing as an affiliate non-profit of HACSB. HPI, Inc.'s designation as a Community Housing Development Organization (CHDO) allows it to apply for and receive HOME funds from the County of San Bernardino, Department of Community Development and Housing and other cities for the acquisition, development and rehabilitation of housing units. With over 30 years of housing development experience behind it, HPI, Inc. provides HACSB the means to leverage a variety of public and private funding sources to continue to increase the supply of affordable housing throughout the county of San Bernardino.

In 2017 HPI completed the Horizons at Yucaipa development, a new construction affordable senior project that provides 50 units of affordable senior housing. HPI also acquired a 25-unit development in the City of Loma Linda for homeless and affordable Veteran Housing, providing much-needed supportive services to Veterans living on site. In 2018 HPI completed Loma Linda Veteran's Village, a project in partnership with Meta Housing that provides 87 affordable housing units for veterans and their families. In 2018 HPI and HACSB began construction on two Permanent Supportive Housing projects to provide 68 units of affordable housing, with onsite services, to homeless individuals within the County of San Bernardino. The first site, Golden Apartments, opened in early 2020 and has provided affordable housing coupled with supportive services for residents. The second project, Desert Haven apartments, opened in September of 2021 with both developments now fully leased and operational. In January 2023, HPI, in partnership with HACSB, broke ground on Valencia Grove Phase II, a 104-unit affordable housing development which is part of the three phased redevelopment of Valencia Grove, a former public housing site. Construction on Valencia Grove Phase II is scheduled for completion in 18-months, with lease up and stabilization in Fall of 2024.

HPI Property Acquisitions LLC is an HPI, Inc. controlled entity that owns 241 units throughout the County of San Bernardino. HPI Inc. and its affiliates own a total of 1,343 units.

## Appendix D. Fact Sheets

This section includes a sample of HACSB Fact Sheets which we developed to help us communicate with our customers about the variety of housing programs and services we administer. These Fact Sheets are one tool we use to help educate our team, participants, residents, landlords, and community about who we are as an agency, and our work toward our mission.

HACSB Fact Sheets are posted online at <http://hacsb.com/publications/>.



# WHO WE ARE



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together

As one of the most progressive housing authorities in the country and the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 24,000 people, most of whom are seniors, individuals with disabilities, veterans, and children.

## OUR MISSION

HACSB empowers all individuals and households in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

## OUR VISION

HACSB is committed to creating a world in which all people have a stable and enriched quality of life.



### Moving to Work

In 2008, Congress designated HACSB as a Moving to Work public housing agency. As a testament to our high performance, this designation allows HACSB to waive some Department of Housing and Urban Development (HUD) requirements, permitting us to target the statutory requirements of the Moving to Work Demonstration:

1) Increase cost efficiency; 2) Promote self-sufficiency; and 3) Increase housing choice.



### Housing Families

We help low-income households attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). More than 10,400 families are served through housing assistance payments made to landlords on behalf of the families or by leasing housing owned and managed by HACSB. These programs provide a critical safety net for households in San Bernardino County, where they would need to earn over three times the minimum wage to afford rent for a two-bedroom apartment.

## Housing Authority of the County of San Bernardino, by the numbers:



**88,359**

applications on various waiting lists



**4,107**

seniors 62 years & older housed



**1.1%**

**24,299**

residents/participants housed, making up 1.1% of the county's population



**262**

clients who have become new homeowners since 2000



**5,880**

individuals with disabilities housed



**2,254**

homeless individuals & families served



**10,462**

families housed



**316**

scholarship recipients since 1991

[hacsb.com](http://hacsb.com)



# MOVING TO WORK DESIGNATION



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together

## HACSB MOVING TO WORK

In 2008, Congress designated the Housing Authority of the County of San Bernardino (HACSB) as a Moving to Work (MTW) public housing agency. This designation allows HACSB to waive some HUD program regulations in order to target the statutory requirements of the Moving to Work Designation:

- 1) Increase cost efficiency;
- 2) Promote self-sufficiency;
- 3) Increase housing choice.

### WHAT IS IT?

Also known as America's Housing Policy Lab, MTW is a national demonstration program for public housing authorities to design and test affordable housing strategies. Lessons learned by MTW agencies can influence national housing policy to improve programs and services for all families. MTW agencies can waive some program regulations to design innovative initiatives which target at least one of the three statutory objectives of the MTW demonstration. Using MTW flexibilities, we have executed 29 innovative initiatives based on the three statutory objectives of the MTW demonstration:



ANNIVERSARY

## CELEBRATING 15 YEARS!!

In 2023, HACSB proudly celebrates its 15-year anniversary as an MTW Agency. Reaching this milestone would not be possible without the support and collaboration of the Department of Housing and Urban Development, HACSB's dedicated staff, Board of Commissioners and numerous partners.

Some cumulative outcomes of  
our MTW initiatives include:

- \$2.09 million in administrative cost savings attained through our biennial and triennial recertifications initiative
- 1,273 households who transitioned out of assisted housing to self-sufficiency



Save taxpayer dollars  
through efficient work



Help our families achieve  
economic independence



Ensure a family's freedom  
of housing choice



## SPOTLIGHT ON SUCCESS: PARTICIPANT PROFILE

After almost 10 months of searching for a home to fit their needs, Ms. A. and her family moved into their new home at the end of 2022. Ms. A. transitioned from the HACSB Term-Limited Lease Assistance Program and is one of the almost 300 participants who have become homeowners through HACSB's Homeownership Assistance Program. HACSB's Homeownership Assistance Program provides guidance and resources to help participants become homeowners. When asked what advice she would offer to other participants considering HACSB's Homeownership Program, Ms. A. shared: "If you can dream it, you can do it." Congratulations to Ms. A. and her family on their new home!

# MOVING TO WORK ACHIEVEMENTS

We are proud to report the results from some of our  
Moving to Work initiatives during FYE 2022:



## **Saving Taxpayer Dollars**

Saved \$241,661 through streamlining the  
income and rent process.



## **Ensuring Housing Choice**

1,765 families leased units that would have been  
out of reach under traditional program regulations.  
Leasing in areas of opportunity increased by 15%.



## **Assisting Families to Achieve Self-Sufficiency**

Using savings through other MTW initiatives,  
HACSB has created two full-time positions to  
work with Term-Limited Lease Assistance families,  
coaching them to set and achieve their  
self-sufficiency goals.



## **Partnerships**

On the average, HACSB partners with over 196  
local agencies to help support the goals of its MTW  
program participants.

For over 13 years, HACSB has also partnered with  
Loma Linda University to conduct in depth research  
and analysis of its MTW initiatives and programs to  
guide the future development of our policy  
decisions.

## **Promoting Economic Independence**

-50% ————— 0 ————— 50%



18% decrease in the number of  
families receiving assistance income

64% average increase in earned  
income among families served



Housing Authority of the  
County of San Bernardino  
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[hacsb.com](https://hacsb.com)



# EMERGENCY HOUSING VOUCHER PROGRAM



Housing Authority of the  
County of San Bernardino  
Building Opportunities Together

## Testing New Methods for Addressing Homelessness

Emergency Housing Voucher Program Collaboration,  
Research and Evaluation

The Housing Authority of the County of San Bernardino (HACSB) was awarded funding for up to 455 vouchers through the Emergency Housing Voucher (EHV) Program to provide emergency housing. The EHV program is the first voucher program to include funding for supportive services such as housing navigation, security deposits, application fees and more. In reality, these funds generally are only enough to pay for the security deposit. In order to provide additional supportive services, HACSB partnered with the County of San Bernardino and was awarded Emergency Solutions Grant (ESG) funding. These ESG dollars were used to provide housing navigation services to EHV customers. EHV customers with housing navigation support were 65% more likely to successfully lease than customers in other programs without housing navigation support

HACSB has also partnered with Loma Linda University (LLU) to research and evaluate the factors which influence an individual's ability to successfully lease with EHV assistance along with their ability to remain stably housed. The first wave of evaluation identified the following primary barriers to successfully leasing:

1. *Tenant preference (location, amenities, etc.)*
2. *Inability to maintain contact between housing navigation services provider and customer*
3. *Financial barriers (stable income and/or employment, security deposit, etc.)*
4. *Physical limitations (first-floor accommodations, etc.)*
5. *Legal barriers*

HACSB continues to work with LLU for evaluation of the EHV program. The next wave of research will also evaluate the factors that influence an EHV household's ability to remain stably housed.

“ I am very thankful to have  
a roof over my head.”  
- HACSB EHV participant.

## EMERGENCY HOUSING VOUCHER PROGRAM FAST FACTS

**Total Voucher Funding Allocated:**

**Total Vouchers Utilized:**

**Units Leased:**

**Actively Searching:**



## EMERGENCY HOUSING VOUCHER PROGRAM: TIMELINE



<https://hacsb.com/types-of-affordable-housing/>



## Appendix E. Summary of HACSB Moving to Work Activities

NO.	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
1	Single Fund Budget	Cost Effectiveness	FY 2009	Implemented
2	Strategic Investment Policies	Cost Effectiveness	FY 2009	Closed Out
3	Alternate Assessment Program	Cost Effectiveness	FY 2009	On Hold
4	Biennial and Triennial Recertifications	Cost Effectiveness	FY 2009	Implemented
5	Simplified Income Determination	Cost Effectiveness	FY 2009	Implemented
6	Elimination of Assets	Cost Effectiveness	FY 2009	Closed Out
7	Controlled Program Moves	Cost Effectiveness	FY 2009	Closed Out
8	Local Policies for Portability	Economic Self-Sufficiency	FY 2009	Implemented
9	Elimination of Earned Income Disallowance	Economic Self-Sufficiency	FY 2009	Closed Out
10	Minimum Rent	Economic Self-Sufficiency	FY 2009	Implemented
11	Local Project-Based Voucher Program	Expanding Housing Opportunities	FY 2009	Implemented
12	Local Payment Standards	Expanding Housing Opportunities	FY 2009	Implemented
13	Local Inspection Standards	Cost Effectiveness	FY 2010	Implemented
14	Local Asset Management Program	Cost Effectiveness	FY 2010	Implemented
15	Pilot Work Requirement	Economic Self-Sufficiency	FY 2010	Closed Out
16	Operating Subsidy for Vista del Sol	Expanding Housing Opportunities	FY 2010	Closed Out
17	Local Income Inclusion	Economic Self-Sufficiency	FY 2011	Closed Out
18	Property Management Innovation	Cost Effectiveness	FY 2011	Implemented
19	Local FSS program	Economic Self-Sufficiency	FY 2011	Closed Out
20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented



<b>25</b>	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
<b>26</b>	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Implemented
<b>27</b>	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented
<b>28</b>	Leasing Success Strategies	Expanding Housing Opportunities	FY 2022 Amendment 1	Implemented
<b>29</b>	Moving On Strategy	Expanding Housing Opportunities	FY 2023	Implemented
<b>30</b>	Valencia Grove Phase II, Affordable Rent Strategy	Expanding Housing Opportunities	FY 2024	Proposed